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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION

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STATE OF MISSOURI, et al., )  
)  
Plaintiff, )  
)  
vs. )  
)  
JOSEPH R. BIDEN, JUNIOR, et )  
al., )  
)  
Defendants. )  
)

Case No.  
3:22-cv-01213  
-TAD-KDM

---o0o---

TUESDAY, NOVEMBER 29, 2022  
ZOOM VIDEOTAPED DEPOSITION OF ELVIS CHAN

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REPORTER: BALINDA DUNLAP, CSR 10710, RPR, CRR, RMR

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A P P E A R A N C E S

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A P P E A R A N C E S

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1 REMOTE VIA ZOOM, CALIFORNIA, NOVEMBER 29, 2022

2 ---o0o---

3 BE IT REMEMBERED that on Tuesday, the 29th  
4 day of November 2022, commencing at the hour of  
5 9:07 a.m. thereof, remotely via Zoom, California,  
6 before me, Balinda Dunlap, a Certified Shorthand  
7 Reporter in and for the County of San Francisco,  
8 State of California, remotely appeared:

9 THE VIDEOGRAPHER: Okay. Good morning,  
10 everyone. We are on the record. Today's date is  
11 November 28 -- I'm sorry, 29th, 2022. The time is  
12 9:07 a.m.

13 This is the video-recorded deposition of  
14 Elvis Chan in the matter of State of Missouri  
15 versus Joseph R. Biden, filed in U.S. District  
16 Court for the Western District of Louisiana, Monroe  
17 Division.

18 This deposition is being held at the U.S.  
19 Attorney's Office, Northern District of California,  
20 in San Francisco.

21 The reporter's name is Balinda Dunlap. My  
22 name is Ruslan Gurzhiy. I am the legal  
23 videographer. We are here with Lexitas Legal.

24 Will the attorneys present please  
25 introduce themselves and the parties they

1 represent.

2 MR. SAUER: John Sauer on behalf of the  
3 Missouri Attorney General's Office and State of  
4 Missouri. I am joined by my colleagues Ken Capps  
5 and Todd Scott, as well as John Burns and Jenin  
6 Younes on behalf of private plaintiffs.

7 MR. SUR: I am Indraneel; my last name is  
8 Sur, S-u-r. I'm at the Phoenix Department of  
9 Justice, Civil Division, Federal Programs Branch,  
10 representing the defendants in this matter.

11 (Discussion off the record.)

12 THE VIDEOGRAPHER: Okay. Any feedback  
13 now? Okay. Somebody hold this. Please continue.

14 MR. SUR: I am Indraneel; my last name is  
15 Sur, S-u-r. I am at the United States Department  
16 of Justice, Civil Division, Federal Programs  
17 Branch; and we are representing the defendants  
18 today, and some of my colleagues are as well.

19 MR. BERGER: Okay. I am just announcing  
20 myself. I don't know if I am out of order, though.  
21 Berger, Lawrence Berger. I represent Elvis Chan.

22 (Discussion off the record.)

23 //

24 //

25 //

1 ELVIS CHAN  
2 called as a witness by the Plaintiff,  
3 having been sworn to tell the truth, the whole  
4 truth, and nothing but the truth, was examined and  
5 testified as follows:

6 EXAMINATION BY MR. SAUER

7 Q. Would you please state your name for the  
8 record.

9 A. My name is Elvis Chan, E-l-v-i-s, C-h-a-n.

10 Q. And what's your occupation, sir?

11 A. My title is the Assistant Special Agent in  
12 Charge of the Cyber Branch for San Francisco  
13 Division of the Federal Bureau of Investigation.

14 Q. How long have you worked for the San  
15 Francisco Division of the FBI?

16 A. I have worked for the FBI for over 17  
17 years.

18 Q. Have you been in San Francisco the whole  
19 time?

20 A. Minus three years at headquarters.

21 Q. Was that in Washington, D.C.?

22 A. Yes. From 2011 to 2014.

23 Q. Have you ever given a deposition before?

24 A. No, I have not.

25 Q. Is this your first deposition?



1 A. Yes. This is my first civil deposition.

2 Q. How about criminal depositions?

3 A. I have not given criminal depositions  
4 before.

5 Q. Can I just go over a few kind of common  
6 ground rules with you?

7 First of all, as I'm asking the questions  
8 today, can you listen carefully to the question  
9 that I'm asking and answer the question that I ask?  
10 Can you do that?

11 A. Yes.

12 Q. And if you don't understand the question,  
13 could you please ask me for clarification instead  
14 of guessing at what my meaning might be in  
15 responding to a question that you're not sure is  
16 what I'm asking? Can you do that?

17 A. Yes.

18 Q. And can you and I be careful not to  
19 interrupt each other, just because that makes the  
20 record unclear and life difficult for the court  
21 reporter?

22 A. Yes.

23 Q. Also, could you be careful to respond with  
24 actual oral responses, not with head-shakes and  
25 "huh-uhs" and "uh-huhs" and things like that, just

1 so that the record's clear? For example, "yes" and  
2 "no," not "uh-huh" and not nodding or shaking the  
3 heads; can you do that?

4 A. Yes.

5 Q. And in addition, let's both -- I think we  
6 both are fast talkers, especially me. Can we both  
7 make an effort to talk slowly enough today so that  
8 the court reporter has a chance to take down what  
9 we're saying?

10 A. Yes.

11 Q. Can you describe your educational  
12 background?

13 A. I graduated from the University of  
14 Washington with a bachelor of science degree in  
15 chemical engineering and chemistry, and then I  
16 graduated from the Naval Postgraduate School with a  
17 master of arts in homeland security studies.

18 Q. When did you graduate from the Naval  
19 Postgraduate School?

20 A. Last year, 2021, in September.

21 Q. Oh, and you got a -- did you say you got  
22 an MA there?

23 A. Yes.

24 Q. Did you do a thesis in connection with  
25 that -- that degree?

1 A. Yes, I did.

2 Q. What was the title of the thesis?

3 A. "Fighting Bears and Trolls:" Russian  
4 disinformation against the 2020 elections and the  
5 social media companies and U.S. government  
6 countermeasures.

7 Q. I am showing you a document previously  
8 marked as Exhibit 1. Is this, in fact, a copy of  
9 that thesis?

10 (Reporter marked Exhibit No. 1 for  
11 identification.)

12 THE WITNESS: Yes, that is a copy of that  
13 thesis.

14 Q. BY MR. SAUER: Okay. You are listed as  
15 the sole author there on the first page?

16 A. That is correct.

17 Q. Okay. And again, as you've noted earlier,  
18 this is, I think, dated just over a year ago,  
19 September of 2021, correct?

20 A. That is correct.

21 Q. Can I just -- can you kind of generally  
22 characterize what this thesis is about? You know,  
23 what's the topic? What are you investigating,  
24 researching or defending?

25 MR. SUR: Objection; compound.

1           **Q.    BY MR. SAUER:  You may answer.**

2           A.    Okay.  So my thesis, the synopsis of it is  
3    I examined Russian malign-influence activities,  
4    specifically on social media platforms, ahead of  
5    and during the 2020 elections.  And then I examined  
6    the actions taken by three social media companies;  
7    specifically Google; Meta, which was previously  
8    Facebook; and Twitter; and then I also examined the  
9    U.S. government's countermeasures against Russian  
10   actions.

11           **Q.    When you say "Google," do they operate**  
12   **YouTube?**

13           A.    Yes, they do.

14           **Q.    So your reference to Google would**  
15   **encompass YouTube; investigating, you know, these**  
16   **kinds of issues on YouTube as well?**

17           A.    That is correct.  And if I may add, when I  
18   reference Meta or Facebook, I mean all of the  
19   Meta-associated products, which include Facebook,  
20   Instagram and WhatsApp.

21           **Q.    Would that include Nextdoor too?**

22           A.    It would not include Nextdoor.

23           **Q.    Is that is not a Meta app?**

24           A.    It is not a Meta-owned company.

25           **Q.    Okay.  You referred to, I think, Russian**

1 **malign-influence activities. Can you describe what**  
2 **-- what does that mean?**

3 A. So there are -- in my thesis, there are --  
4 there's a description of two types of Russian  
5 malign-influence activities. I am specifically  
6 talking about online activities.

7 The first type of activity is what is  
8 known generally as a hack-and-dump activity. I  
9 think the best example I would have of that is the  
10 hack of the Democratic National Committee and the  
11 DCCC, the Democratic Congressional Campaign  
12 Committee, in 2016; hacking of their servers; and  
13 then the leaking or dumping of their information on  
14 the Internet over the course of the 2016 election  
15 season. That is one type of Russian malign  
16 influence, but I do not focus on that in the  
17 thesis. I do reference it.

18 The second type of Russian malign  
19 influence that I discuss in the thesis itself is on  
20 the social media platforms and on fake news  
21 websites that the Russians have created.

22 **Q. And is there a connection between those?**  
23 **Like, the fake news sites, do those get, you know,**  
24 **boosted up to social media platforms by the**  
25 **Russians?**

1           A.     Yes. From my thesis, I was able to  
2 determine that the social media platforms were used  
3 to direct viewers from the social media platforms  
4 to the fake news sites being controlled by Russian  
5 state-sponsored actors.

6           **Q.     And those viewers, I take it, would**  
7 **include American citizens who were being**  
8 **principally targeted by these activities?**

9           MR. SUR: Objection; vague.

10          **Q.     BY MR. SAUER: Were they --**

11          A.     I am not sure, but it would be -- I'm not  
12 sure of who the viewers would be, but whoever would  
13 look at the fake Russian accounts and click on the  
14 link or be directed to the website. But I do not  
15 know who the specific users are.

16          **Q.     Does your thesis have evidence that people**  
17 **actually did that? In other words, that people**  
18 **actually clicked through and accessed the Russian**  
19 **fake news sites?**

20          MR. SUR: Objection; compound.

21          THE WITNESS: So my thesis -- my thesis  
22 was based on the report of both the social media  
23 companies as well as third parties, such as  
24 Graphika. So I relied on their analysis of the  
25 direct data.

1           **Q. BY MR. SAUER: Did their analysis indicate**  
2           **that there had been, in fact, that kind of**  
3           **engagement of viewers of the social media accounts**  
4           **to go through to the fake news sites?**

5           A. From both the social media company  
6           standpoint, the answer is yes; but in general, I  
7           was told that it was a, quote/quote, low  
8           engagement, from what they could tell.

9                   And then from the third-party reports,  
10           they did not characterize it as much. They said  
11           that they believed that viewers could be directed,  
12           but they did not say who the amount were or the  
13           percentage of any of those viewers.

14           **Q. And did your research indicate a higher**  
15           **level of engagement with the kind of fake social**  
16           **media accounts operated by the Russians than the**  
17           **fake news websites?**

18           A. Yes. In general, yes.

19           **Q. Let me ask this: You referred a minute**  
20           **ago to U.S. government countermeasures, I believe.**  
21           **Can you describe, just generally, what sort of U.S.**  
22           **government countermeasures do you discuss in the**  
23           **thesis?**

24           A. So there were three U.S. government  
25           countermeasures that I discussed in the thesis.

1 Number one was an initiative that the FBI took  
2 called the Protected Voices Initiative. That was  
3 actually focused on hack-and-dump operations. And  
4 the Protected Voices Initiative was cybersecurity  
5 briefings and awareness training provided for all  
6 the national-level political committees, such as  
7 the RNC, the DNC, the RSCC, the DCCC. Briefings  
8 were provided by our Washington field office.

9 And then briefings were also provided to  
10 the vast majority of the presidential candidates  
11 for the 2020 election season. I think there were  
12 approximately two dozen of those presidential  
13 candidates that were provided -- them and their  
14 senior staff were provided cybersecurity briefings.  
15 That was one of the measures that was taken.

16 A second measure that was taken was the  
17 information sharing with the private sector  
18 companies, where we shared both strategic-level  
19 information as well as tactical information.

20 And then the third -- the third measure I  
21 think I mentioned in the thesis was that -- the  
22 CISA Act, the formation of the Cybersecurity and  
23 Information Security Agency in 2018 and their  
24 ability to provide state, county and local election  
25 officials with both grants, federal grants to



1 improve their infrastructure as well as with  
2 cybersecurity training.

3 Q. Okay. That was -- you said a lot there,  
4 and I just want to ask you a few follow-up  
5 questions to kind of unpack it.

6 I think you said the second U.S.  
7 government countermeasure was information sharing;  
8 is that right?

9 A. That's correct.

10 Q. What is a --

11 A. I might have the order incorrect. I  
12 haven't looked in my thesis since over a year, but  
13 yeah.

14 Q. Well, let me ask you this: Information  
15 sharing, you know, is that information sharing  
16 between federal agencies and social media  
17 platforms?

18 A. That is information sharing between the  
19 FBI and the -- in the thesis I focus on the three  
20 social media companies.

21 Q. So -- so specifically your thesis focuses  
22 on information sharing between the FBI and  
23 basically Facebook, Google and Twitter, right?

24 A. That is correct.

25 Q. Yeah. Is there other information sharing

1     **that happened by other federal agencies on issues**  
2     **that relate to this?**

3             MR. SUR:  Objection; lacks foundation,  
4     vague.

5             **Q.    BY MR. SAUER:  If you know.**

6             A.    I am generally aware that other federal  
7     agencies want to do private sector engagement, but  
8     I am not familiar with the frequency of the  
9     information sharing or the type of information  
10    sharing.

11            **Q.    Do you know which other federal agencies**  
12    **do that?**

13            MR. SUR:  Objection; vague, lacks  
14    foundation.

15            THE WITNESS:  I have been -- I am aware  
16    specifically that CISA, the Cybersecurity and  
17    Infrastructure Security Agency, does information  
18    sharing in terms of elections with the social media  
19    companies.

20            **Q.    BY MR. SAUER:  To the extent you know,**  
21    **what kind of information sharing do they do?**

22            A.    All of the information that I have  
23    personally witnessed comes through what CISA has  
24    called the "industry working group."  That includes  
25    the three social media companies I mentioned.  And

1 the type of information that they have shared is  
2 generally about when the primaries for each state  
3 happen and then to highlight anything that they  
4 believe is a -- unique or different from  
5 standard -- or from what is considered normal.

6 For example, like an Iowa caucus is not a  
7 normal type of primary. Most states do not run  
8 caucuses, so they will highlight something like an  
9 Iowa caucus. They will also highlight the election  
10 methods that are used in different states, whether  
11 it be a paper ballot or an electronic device, like  
12 a touch-screen device.

13 **Q. That industry working group, do you**  
14 **personally participate in that?**

15 A. I have participated in several of them.

16 **Q. How often do they occur?**

17 A. For the year 2020, I think for the first  
18 half of the year they occurred quarterly. So I  
19 think, you know, every three months.

20 And then for the last half of the year, I  
21 want to say around the June, July time frame, it  
22 moved to monthly.

23 **Q. How about in 2022?**

24 A. In 2022 I believe they were about the  
25 same. It happened quarterly. And then I believe

1 ahead of the midterm elections they moved to  
2 monthly; except due to my conflicting schedule, I  
3 believe I was only able to attend about three of  
4 the meetings this year.

5 **Q. When you say "attend," are these all done,**  
6 **you know, by Zoom? Or are there -- is there a big**  
7 **kind of in-person meeting?**

8 A. And I have attended via videoconference,  
9 and it's not Zoom. It's typically whatever the  
10 private sector companies want to use. So I have  
11 seen Cisco Webex or BlueJeans. Those are the two I  
12 remember.

13 **Q. Do a lot of companies participate in these**  
14 **meetings?**

15 A. Yes. Several companies participate in  
16 these meetings.

17 **Q. Okay. But which ones, do you recall?**

18 A. I do -- I do recall. I don't know if  
19 that's law enforcement sensitive or not. I don't  
20 know if the companies want to be disclosed.

21 **Q. Please tell us on the record what**  
22 **companies participated.**

23 A. Meta --

24 MR. BERGER: Yeah, Elvis, is this -- is it  
25 classified or protected? How do you -- what's your

1 understanding of the classification of this  
2 information?

3 THE WITNESS: My understanding is that  
4 this is -- that this is sensitive information and  
5 that the --

6 MR. BERGER: All right. I'll direct  
7 you -- I'll direct you not to disclose it. We'll  
8 have to take it to the judge.

9 MR. SAUER: Okay. Is this a -- okay. You  
10 realize the government has already disclosed that  
11 information in interrogatories for this case.

12 (Discussion off the record.)

13 MR. SAUER: You realize this information  
14 has already been disclosed by the government in  
15 their interrogatory responses in this case.

16 And in addition to that, there is no  
17 privilege of law enforcement sensitive. There is a  
18 law enforcement investigative files privilege that  
19 is clearly inapplicable here.

20 And also, are both counsel going to  
21 instruct the witness not to answer questions here?

22 MR. BERGER: Well, if it's already been  
23 disclosed in interrogatories, why don't you ask him  
24 based on -- you know, give him the names that have  
25 already disclosed.

1 MR. SAUER: I'd like to cross-verify the  
2 information I got from the government from someone  
3 who personally participated in the meetings, and  
4 I'm entitled to do that.

5 MR. SUR: Counsel, if I may, I -- do you  
6 think it would be helpful to have a break at this  
7 point to sort this out?

8 MR. SAUER: Yeah. We can go off the  
9 record.

10 MR. SUR: Okay.

11 MR. SAUER: Okay.

12 THE VIDEOGRAPHER: Off the record -- off  
13 the record at 9:27 a.m.

14 (Whereupon a recess was taken.)

15 THE VIDEOGRAPHER: We are back on the  
16 record at 9:37 a.m.

17 MR. SAUER: So, Counsel, where are we?  
18 Are you standing on that objection?

19 MR. BERGER: I withdraw the objection. Go  
20 ahead.

21 MR. SAUER: Yeah. Thank you. As a  
22 process point, I am requesting that one attorney  
23 make the objections and represent him in this  
24 deposition, not two. Now, I have no problem if  
25 Mr. Berger wants to flag something for Mr. Sur.

1 But I understand that Mr. Sur is defending the  
2 deposition, not Mr. Berger. So if you've got an  
3 issue, I don't mind if you guys want to talk about  
4 it, but I don't want to have multiple -- multiple  
5 attorneys objecting and instructions being started.  
6 Can we proceed on that basis from now on?

7 MR. SUR: We intend to do so. There may be  
8 some exceptional circumstances that warrant a  
9 different approach, but that's how we expect to  
10 proceed.

11 MR. SAUER: I am fine to hear that. You  
12 know, if things come up that raise an issue, you  
13 know, we can -- we can raise them. But, yeah,  
14 anyway, all right. I mean, to be clear, you know,  
15 any law enforcement privilege is held by the  
16 government, not by Mr. Chan's personal capacity,  
17 and Mr. Sur is the one who is there to represent  
18 the government today.

19 **Q. So -- but anyway, okay. Mr. Chan, or**  
20 **Agent Chan, who do you recall on the social media**  
21 **platform side participating in these -- in these**  
22 **working group meetings that you have been**  
23 **testifying about from 2020 and 2022?**

24 A. The companies that I remember attending  
25 the meetings are Facebook; Microsoft; Google;

1 Twitter; Yahoo!, which may have been known as  
2 Verizon Media at the time; Wikimedia Foundation and  
3 Reddit.

4 **Q. Do you remember any others at this time?**

5 A. I think I listed seven. I -- those were,  
6 like, the regular participants that I can remember.

7 **Q. How about on the U.S. government side,  
8 what agencies were represented at these meetings?**

9 A. At these meetings, CISA is the host and  
10 facilitator for the meeting. They also invite  
11 another component of Department of Homeland  
12 Security called Intelligence and Analysis, I&A, so  
13 DHS I&A I know attends. The Office of the Director  
14 of National Intelligence, ODNI, attends. And then  
15 from the FBI there is typically a representative  
16 from the FBI's Foreign Influence Task Force, which  
17 you will hear me abbreviate as FITF regularly. And  
18 then I attend from FBI San Francisco when I am  
19 available.

20 **Q. And why are you included in particular?**

21 A. The reason that I attend these meetings is  
22 because the way the FBI works is FBI field offices  
23 are responsible for maintaining the day-to-day  
24 relationships with the companies that are  
25 headquartered in their area of responsibility,



1 which I may occasionally abbreviate to AOR. And  
2 all of the companies that have been listed, with  
3 the exception of Microsoft, are all headquartered  
4 in FBI San Francisco's territory.

5 **Q. Now, where is Microsoft headquartered?**

6 A. They are headquartered in Redmond,  
7 Washington.

8 **Q. And then on the CISA side in particular,**  
9 **what individuals participate in these meetings?**

10 A. Typically there are senior-level -- what I  
11 believe are senior-level officials. The two that I  
12 specifically remember are Matt Masterson and Brian  
13 Scully.

14 **Q. Is that Matt Masterson, did you say?**

15 A. Yeah. Yeah, Matthew Masterson and Brian  
16 Scully are the two regular attendees. And they are  
17 usually -- one or both of them -- one -- either one  
18 of them is usually emceeding the meeting.

19 **Q. So Brian Scully, do you know him**  
20 **personally?**

21 A. I know him just through work.

22 **Q. Okay. In what connection at work?**

23 A. And I only know -- I only know  
24 Mr. Masterson through work as well.

25 **Q. When you say you know him through work,**

1 **did you work together on anything other than these**  
2 **meetings?**

3 A. So we have met -- I want to say I have met  
4 in person with each of those individuals, twice in  
5 person; but they are primarily through either the  
6 preparatory calls for these meetings that they are  
7 hosting or the meetings themselves.

8 **Q. So you work with CISA in preparatory calls**  
9 **for these industry working group meetings?**

10 A. Yes.

11 **Q. And in that connection, you've met Brian**  
12 **Scully and Matt Masterson, correct?**

13 A. Yes.

14 **Q. And Brian Scully is involved in kind of**  
15 **leading or emceeding these meetings; is that right?**

16 MR. SUR: Objection; vague.

17 **Q. BY MR. SAUER: Or is he the -- is he the**  
18 **leader of the meeting when it convenes?**

19 A. For the 2020 election cycle, Mr. Masterson  
20 was the primarily -- he was primarily the  
21 facilitator. Ahead of the 2022 midterm elections,  
22 Mr. Scully has been the primary facilitator.

23 **Q. Was that because Mr. Masterson left CISA**  
24 **in the -- in the intervening time?**

25 A. Yes.

1 Q. Do you know where he works now?

2 A. Yes. I believe he works at Microsoft now.

3 Q. Do you -- do you interact with him now as  
4 a representative of a -- of a tech company?

5 MR. SUR: Objection; vague.

6 THE WITNESS: I have only interacted with  
7 him on two occasions. One was when he showed up at  
8 one of the more recent industry meetings ahead of  
9 the 2022 midterm elections. That is when I  
10 discovered that he went to Microsoft. And then I  
11 asked him to send me his new contact information  
12 during the call, and then he sent me an email and  
13 provided me with his new contact information.

14 Q. BY MR. SAUER: You work with CISA on these  
15 industry working group meetings to help prepare  
16 them, what's the nature of your involvement in  
17 preparing for these meetings? Do you kind of set  
18 the agenda or -- you know, what's your involvement?

19 MR. SUR: Objection; vague and compound  
20 and implicates the deliberative process privilege.

21 MR. SAUER: Let me rephrase the question.

22 Q. Are you involved in preparing for these  
23 meetings?

24 A. No. I participate in the preparation  
25 meetings, but I do not provide any agenda items.

1 Q. Do you remember anyone else at CISA  
2 besides Mr. Scully and Mr. Masterson who  
3 participates in these meetings?

4 A. I don't recollect any other people's names  
5 at this time.

6 Q. Were there others who participated in --  
7 but you just don't remember who they were?

8 A. Yes, that is correct.

9 Q. Okay. Let me -- do you still have Exhibit  
10 1 on the screen in front of you, your thesis?

11 A. Yes.

12 Q. Okay. Let me ask -- let's turn back to  
13 that for a little while. And if we could, I am  
14 going to scroll ahead to your abstract on Page v.  
15 Can you see that clearly, Roman numeral v.

16 MR. SUR: Roman numeral v. Okay.

17 THE WITNESS: Yes, I see it now.

18 Q. BY MR. SAUER: And can you see it also on  
19 the screen share as well as on the iPad? I want to  
20 make sure you can see the document in both places  
21 as we go forward today.

22 A. I can see the bottom half of one  
23 paragraph, and then -- wait, now -- now I see --  
24 yeah, I see the bottom paragraph of the --

25 Q. Actually, can I -- can I direct your

1 attention this sentence here in your abstract that  
2 I am highlighting? I guess, actually, for context,  
3 if you see above -- actually, just focus on that  
4 sentence. "This" -- you say, "This thesis finds  
5 that the Russians shifted their tactics from 2016  
6 to 2020," right?

7 A. Correct.

8 Q. And then you say, "Still, the U.S.  
9 government and social media companies effectively  
10 impeded their influence campaigns primarily through  
11 information sharing and account takedowns,  
12 respectively," correct?

13 A. Correct.

14 Q. What do you mean by "information sharing"  
15 here?

16 A. So "information sharing" is meant --  
17 there -- as I mentioned previously, there are two  
18 types of information that the U.S. government,  
19 specifically the FBI, shares with the social media  
20 companies. The first type of information, the  
21 strategic information, which discusses the tools,  
22 tactics or processes, shortened to be TPPs, used by  
23 the Russians.

24 The second type of information shared by  
25 the U.S. government is tactical information. And

1 when I mean tactical information, I specifically  
2 mean indicators or selectors. And both of those  
3 are a term of art within the cybersecurity  
4 industry. And indicators or selectors include IP  
5 addresses, email accounts, social media accounts,  
6 well, website domain names, and, like, file hash  
7 values.

8 **Q. Sorry. Say the last thing. What kind of**  
9 **hash values?**

10 A. File, like electronic file hash values.

11 **Q. Okay. And so, yeah, I take it the**  
12 **strategic information is kind of high-level advice**  
13 **to the social media platforms about, you know, the**  
14 **kinds of -- kinds of campaigns the Russians might**  
15 **be conducting; is that fair to say?**

16 MR. SUR: Objection; lacks foundation.

17 THE WITNESS: I would not -- I would not  
18 characterize the information we share as advice.

19 **Q. BY MR. SAUER: Okay. Then in that case it**  
20 **is sort of -- is it high-level general information**  
21 **about what FBI understands the Russians are**  
22 **engaging in when it comes to social media influence**  
23 **campaigns?**

24 MR. SUR: Objection; lacks foundation.

25 THE WITNESS: Yes.

1 Q. BY MR. SAUER: And then -- go ahead.

2 Sorry. Go ahead.

3 A. I can provide an example if that would be  
4 illustrative.

5 Q. That would be super helpful. Please do.

6 A. I had the 2020 elections, through our  
7 investigation of the Internet Research Agency, we  
8 discovered that they were trying to set up a base,  
9 as it were, or set up offices in western Africa.  
10 We shared this type of strategic information with  
11 the social media companies. They were able to use  
12 whatever detection methods they have to discover  
13 that there were Russian troll farms being set up  
14 specifically in Ghana and Nigeria.

15 Q. Okay. And so you mentioned earlier that  
16 tactical -- that would be strategic information?

17 A. That would be strategic. To summarize, an  
18 example would be we believe the Russian troll  
19 farms, specifically the Internet Research Agency,  
20 is trying to make inroads in western Africa.

21 Q. Got you. And then tactical information  
22 would be much more specific. Here are specific --  
23 I think you said IP addresses, websites, social  
24 media accounts, that are actually -- the FBI has  
25 concluded are being operated by the Russians. Is

1 that what tactical information is?

2 A. That is correct.

3 Q. So there is -- and so is there information  
4 sharing from the FBI to social media platforms  
5 providing that kind of specific tactical-level  
6 information?

7 A. Yes, there is.

8 Q. And I think your -- that then the timeline  
9 in your thesis goes on specifically with  
10 "information sharing and account takedowns." Does  
11 "account takedowns" refer to the social media  
12 platforms kind of taking down those social media  
13 accounts where the FBI identifies them as being  
14 operated by Russian actors?

15 MR. SUR: Objection; lacks foundation.

16 THE WITNESS: So the FBI shares  
17 information with the social media companies, no  
18 strings attached, so that the social media  
19 companies can protect their platforms as they deem  
20 appropriate. And from what I have observed and  
21 what they have told me when we have provided them  
22 with high confidence of Russian selectors, that  
23 they have been able to discover fake Russian  
24 accounts and take them down.

25 Q. BY MR. SAUER: So you don't control what



1     **they do, correct?**

2           A.    I do not control what they do.

3           **Q.    But you provide them with information that**  
4     **they don't have about the source of certain -- you**  
5     **called them selectors or social media accounts,**  
6     **correct?**

7           A.    Correct.

8           **Q.    And when you provide them with that**  
9     **information, they take it and they pull down those**  
10    **accounts, at least sometimes, fair to say?**

11           MR. SUR:  Objection; lacks foundation.

12           THE WITNESS:  If I can clarify, what they  
13    do is they take the information that we share, they  
14    validate it through their own means.  And then if  
15    they determine that these are accounts being  
16    operated by Russian state-sponsored actors, then  
17    they have taken them down.

18           **Q.    BY MR. SAUER:  Oh, okay.  And then -- and**  
19    **that's, I -- I take it, part of the point of your**  
20    **sharing the information with them, right?  So that**  
21    **they can assess and evaluate and then ultimately,**  
22    **if they agree with your conclusion, take them down,**  
23    **correct?**

24           A.    Correct.

25           **Q.    In other words, the purpose of the**

1 information sharing on the FBI's side is to have  
2 the inauthentic Russian accounts taken down so that  
3 they are not influencing political discourse in the  
4 United States, correct?

5 MR. SUR: Objection; lacks foundation,  
6 calls for speculation.

7 THE WITNESS: I would characterize it as  
8 the FBI provides information to these companies so  
9 that they can protect their platforms as they deem  
10 appropriate, and they can take whatever actions  
11 they deem appropriate without any suggestion or  
12 interference from the FBI.

13 Q. BY MR. SAUER: But my question's a little  
14 different, which is what -- my question is: Part  
15 of the purpose from the FBI's perspective is to  
16 give them the tools to assess and potentially take  
17 down accounts that the FBI has deemed to be  
18 inauthentic, correct?

19 MR. SUR: Objection; lacks foundation,  
20 calls for speculation.

21 Q. BY MR. SAUER: You may answer.

22 A. So I would say -- inauthentic -- so my  
23 focus is on Russian state-sponsored, -controlled  
24 accounts. And so whether the companies take them  
25 down or not, it's their own choice.

1           **Q. Right, but is it your purpose in giving**  
2 **them the information that the FBI believes or has**  
3 **concluded that they are Russian-operated accounts,**  
4 **is it your purpose to equip them to take them down**  
5 **if they end up agreeing with your assessment?**

6           MR. SUR: Objection; lacks foundation,  
7 calls for speculation.

8           THE WITNESS: My purpose is to share the  
9 information with them so that they can protect  
10 their platforms as they deem appropriate.

11           **Q. BY MR. SAUER: And one way to protect**  
12 **their platforms is to take down these accounts,**  
13 **correct?**

14           A. That is correct.

15           **Q. And, in fact, that's what you say here in**  
16 **this sentence, right? You say that, "the U.S.**  
17 **government and social media companies effectively**  
18 **impeded their influence campaigns...through**  
19 **information sharing and account takedowns," right?**

20           A. I said that. You can see -- I put  
21 "respectively" because it was the U.S. government,  
22 specifically the FBI, sharing information; and it  
23 was the social media companies doing the account  
24 takedowns.

25           **Q. Right. And the joint result of that was**

1 **effectively impeding Russian influence campaigns,**  
2 **correct?**

3 A. Correct.

4 Q. **And -- and that's FITF's goal, right? To**  
5 **effectively impede Russian influence campaigns,**  
6 **right?**

7 MR. SUR: Objection; lacks foundation,  
8 calls for speculation.

9 THE WITNESS: Yeah, FITF -- my  
10 understanding of FITF's goal is to counter malign  
11 foreign-influence campaigns.

12 Q. **BY MR. SAUER: Does that include**  
13 **effectively impeding their influence campaigns, as**  
14 **you say in your thesis?**

15 A. Yes.

16 Q. **Does that include doing so through account**  
17 **takedowns by information sharing with social media**  
18 **platforms?**

19 MR. SUR: Objection; lacks foundation,  
20 mischaracterizes the testimony.

21 THE WITNESS: Yeah, I believe you're  
22 mischaracterizing. So like I said before, the FBI  
23 shares information with no strings attached and no  
24 expectations to -- for the companies. And the  
25 companies, they can protect their own platforms.

1 MR. SAUER: I am going to jump ahead to  
2 page little Roman xvii.

3 You can see there, Indraneel, it's going  
4 to be on Page 19 of the PDF. See that?

5 MR. SUR: Yep. Yeah, we're on it.

6 Q. BY MR. SAUER: Okay. I believe this is a  
7 kind of summary section of your thesis. You talk  
8 about in this paragraph here that begins with, "The  
9 U.S. government's response," that I have  
10 highlighted; do you see that?

11 A. Yes.

12 Q. And you say, "The U.S. government's  
13 response to the Russian influence campaign appeared  
14 more robust before the 2020 elections than in the  
15 2016 or 2018 elections," correct?

16 A. Correct.

17 Q. And then in the next sentence, you say,  
18 "The most important actions taken by the U.S.  
19 government may have been the information sharing  
20 with the social media companies to expose Russia's  
21 different operations and shut down its accounts,"  
22 correct?

23 A. Correct.

24 Q. So the information sharing was done, "To  
25 expose Russia's different operations and shut down

1     **its accounts," right?**

2           A.     Correct.

3           **Q.     And then "its" refers to Russia, right?**  
4     **So (as read) "to expose Russia's different**  
5     **operations and shut down Russia's accounts,"**  
6     **correct?**

7           A.     Correct.

8           **Q.     I am going to jump ahead a few pages to**  
9     **Page xxii.**

10           MR. SAUER:   And, Indraneel, if you're  
11     following on your iPad, that's going to be Page 24  
12     of the PDF.

13           **Q.     There's a reference here in the**  
14     **acknowledgments where you refer to, "My colleagues**  
15     **back at headquarters who were in the trenches with**  
16     **me as we worked to protect the 2020 elections."**  
17     **See that?**

18           A.     Yes.

19           **Q.     Okay.   What are you talking about there**  
20     **where it says (as read), "in the trenches with you**  
21     **as you worked to protect the 2020 elections"?**

22           A.     I'm referring to my colleagues  
23     specifically at the Foreign Influence Task Force  
24     who participated in the meetings with me, who  
25     provided briefings to the companies and who

1 coordinated the information sharing.

2 **Q. And so you said you had meetings with the**  
3 **companies. What meetings did you have?**

4 A. We had -- let me be more clear. I hosted  
5 meetings, bilateral meetings between each of the  
6 companies I mentioned and the Foreign Influence  
7 Task Force.

8 And we would also bring in field offices  
9 that had investigations related to malign foreign  
10 influence by state-sponsored actors. We would also  
11 bring in field offices that had cyber  
12 investigations. And when I mean cyber  
13 investigations, I mean state-sponsored actors that  
14 the FBI was investigating that we believe were  
15 capable of hack-and-dump campaigns that we observed  
16 in the 2016 election.

17 **Q. Okay. Let me unpack that a bit.**

18 **First of all, you said there were meetings**  
19 **with social media companies, between you and social**  
20 **media companies during the 2020 election cycle,**  
21 **correct? Is that what we're talking about?**

22 A. Yes, that is correct.

23 **Q. Now, did those meetings also continue in**  
24 **the 2022 election cycle?**

25 A. Yes. They occur at roughly a quarterly

1 cadence.

2 **Q. And then do they -- does the cadence**  
3 **increase as elections get close?**

4 A. Yes, they do. And --

5 **Q. Now, does that become monthly as the**  
6 **election nears and then weekly very close to the**  
7 **elections?**

8 A. Ahead of the 2020 elections, that is  
9 correct. Ahead of the 2022 elections, we moved it  
10 from quarterly to monthly, and then we just had one  
11 meeting a week ahead of the midterm elections.

12 **Q. I'm sorry. You said you had one weekly**  
13 **meeting ahead of the midterm elections?**

14 A. Right. We had one meeting a week before  
15 the midterm elections.

16 **Q. Oh, and how long was the -- how long was**  
17 **that period of weekly meetings? Was that, like,**  
18 **the month before or the three months before?**

19 A. No. Just the week before the election  
20 itself.

21 **Q. Oh, okay. There was one weekly meeting,**  
22 **right, the week before the election?**

23 A. Yeah. There was -- yeah. So there was a  
24 monthly meeting in October; and then we had another  
25 meeting out of -- you know, out of cadence the week



1 before the election, so the end of October.

2 Q. And then are these meetings going back to  
3 quarterly now that the election has passed?

4 A. That is correct.

5 Q. And so you're -- you'll have quarterly  
6 meetings with the social media companies going  
7 forward until the 2024 election cycle gets closer?

8 A. That is what I anticipate.

9 Q. And then as that election gets closer,  
10 then you'll move to monthly and eventually weekly a  
11 couple years from now, or in the fall of 2024; is  
12 that fair to say?

13 MR. SUR: Objection; calls for  
14 speculation.

15 THE WITNESS: That is what I anticipate.

16 Q. BY MR. SAUER: Let me ask you this: What  
17 social media companies are involved in these  
18 meetings?

19 MR. SUR: Objection; vague.

20 THE WITNESS: Currently or in 2020?

21 Q. BY MR. SAUER: Well, let's start with  
22 2020. I'd like to know both. Let's start with  
23 2020, please.

24 A. So for the 2020 elections, we regularly  
25 met with Facebook, Google, Twitter, Yahoo!, Reddit

1 and LinkedIn.

2 **Q. Okay. And then who did you -- which**  
3 **social media companies did you meet with in 2022?**

4 A. The same companies; and we -- less -- not  
5 on a quarterly basis, but on a periodic basis,  
6 maybe twice this year, we also met with Apple and  
7 Wikimedia Foundation.

8 **Q. Does Apple operate social media platforms?**

9 A. They do not.

10 **Q. Then why did they get added to this -- the**  
11 **list?**

12 A. They were added because they are a cloud  
13 infrastructure company; and we believe that  
14 tactical information, specifically indicators that  
15 we shared with them related to  
16 foreign-state-sponsored actors, might pop up on  
17 any -- any screening they do on iCloud.

18 **Q. How about in the 2018 election cycle, did**  
19 **these meetings happen back then?**

20 A. Yes, they did. On a quarterly cadence.

21 **Q. And did they ever get to monthly or weekly**  
22 **back then?**

23 A. I don't recollect. They may have, but I  
24 don't recollect at this time.

25 **Q. You -- what -- let me ask this: What**

1 kinds of people are you meeting with from these  
2 social media platforms? Is this members of the  
3 trust and safety teams of these platforms?

4 MR. SUR: Objection; vague.

5 THE WITNESS: There are typically two  
6 types of people that we meet at these companies --  
7 and when I mean types, I mean roles. So as you  
8 mentioned, one role of person that we typically  
9 meet is a trust and safety or site integrity or  
10 cybersecurity. Like, so a security function person  
11 or team of people.

12 And then we meet with their attorneys too.  
13 So typically there is a security counsel or trust  
14 and safety counsel.

15 Q. BY MR. SAUER: And those trust and safety  
16 and site integrity teams, they are responsible for  
17 defending those platforms from kind of hacking  
18 attempts and things like that, right?

19 MR. SUR: Objection; vague, assumes facts  
20 not in evidence.

21 THE WITNESS: That is my understanding.

22 Q. BY MR. SAUER: And then they are also, I  
23 take it, in charge of enforcing the -- you know,  
24 the terms of service or the content modulation  
25 policies at those platforms; is that right?

1 A. That is my understanding.

2 Q. Let me ask you this: With respect to  
3 Facebook, who do you meet with on the trust and  
4 safety team?

5 A. In what context? Specifically for the  
6 FITF meetings?

7 Q. Well, let's start with those, and then  
8 I'll ask you about other contexts. Yeah, these  
9 sort of quarterly, monthly, then weekly cadence  
10 meetings we have been talking about, who attends  
11 from the kind of trust and safety or site integrity  
12 group from Facebook?

13 A. From, yeah, the trust and safety side of  
14 that house, the people that I typically meet with  
15 are Emily Vacher, Ryan Kelly, Mike Devilotski, Mike  
16 Torrey. The -- those are the senior-level  
17 officials. They are either manager- or  
18 director-level officials. And typically the --  
19 they have investigators or analysts under them, but  
20 that's kind of rotating and on an ad hoc basis --  
21 on an as-needed basis. I don't recollect the names  
22 of most of the analysts.

23 Q. Do you interact with Facebook employees in  
24 other contexts?

25 MR. SUR: Objection; vague.

1 THE WITNESS: Yeah. The majority of my  
2 interaction with Facebook is not in the  
3 disinformation or malign-foreign-influence realm.  
4 It is actually for things related to my -- to the  
5 Cyber Branch, which are specifically cyber  
6 investigations.

7 Q. BY MR. SAUER: How about Twitter? Who do  
8 you meet with at Twitter when it relates to  
9 disinformation and malign-foreign-influence  
10 operations?

11 A. The same as with Facebook. I meet with  
12 trust and safety/site integrity people, and then I  
13 meet with their security counsel.

14 Q. And then what -- what human beings at  
15 Twitter from the trust and safety/site integrity  
16 group do you meet with?

17 A. The head of site integrity until the day  
18 after the midterm elections that I met with was  
19 Yoel Roth, and his senior manager is Will Newland.  
20 But they have both told me they are no longer with  
21 the company.

22 Q. Do you have any new contacts at Twitter  
23 now?

24 A. I was provided their counterpart in the  
25 Dublin, Ireland, office; and I believe his name was

1 Aaron Roderick. I have only exchanged like two  
2 emails with him.

3 **Q. So but up until quite recently, your**  
4 **principal trust and safety contacts at Twitter were**  
5 **Yoel Roth and Will Newland?**

6 A. That is correct.

7 **Q. But they are both senior- or**  
8 **management-level officials in site integrity or**  
9 **trust and safety?**

10 A. That is my understanding.

11 **Q. Anyone else at Twitter that -- who would**  
12 **participate in meetings that relate to malign**  
13 **foreign influence or disinformation?**

14 A. Yes. On the attorney side, they regularly  
15 had several security counsels attend. And the  
16 senior official at the time of the 2020 elections  
17 was Angela Sherrer, but she is also no longer with  
18 the company.

19 **Q. Okay. And then how about Google, who do**  
20 **you -- or who do you meet with at Google about**  
21 **disinformation and malign-foreign-influence**  
22 **activities?**

23 A. On the site integrity/trust and safety  
24 side, the senior director of that group is Shane  
25 Huntley.

1 Q. Anyone else besides -- is that a  
2 Mr. Huntley?

3 A. Yeah. Mr. Shane Huntley.

4 Q. And then is there anyone else at Google  
5 who you meet with?

6 A. Yes. Up until recently, I would say  
7 earlier this year, the senior attorney that we met  
8 with was Richard Salgado, but he has since retired.

9 Q. Anyone else besides those two individuals?

10 A. Those are the two senior officials. The  
11 other officials that I would meet with regularly on  
12 the attorney side include Harold Chun and Mike  
13 Maffei.

14 Q. Sure.

15 A. But I believe both of them are senior  
16 security counsels.

17 Q. How about Yahoo!, who do you meet with on  
18 the site integrity or trust and safety side from  
19 Yahoo! as it relates to malign foreign influence  
20 and disinformation?

21 A. The head of the group that we met with --  
22 they are colloquially known as "The Paranoids" --  
23 is named Chris Kieft.

24 Q. Why are they called "The Paranoids"?

25 A. I believe it was -- I'm not sure, but I

1 believe it was a previous chief information  
2 security officer who said that it was the job of  
3 his team to be paranoid in order to protect their  
4 platform.

5 **Q. Are they paranoid in your view?**

6 MR. SUR: Objection; calls for  
7 speculation.

8 THE WITNESS: They are very good people to  
9 work with.

10 **Q. BY MR. SAUER: I'm sorry. Tell me their**  
11 **names again?**

12 A. Chris Kieft is the director of that group,  
13 and then the senior manager is Suruchi Chen.

14 **Q. Is there anyone else on the trust and**  
15 **safety/site integrity side from Yahoo! that you**  
16 **meet with?**

17 A. There are different investigators that  
18 they will have briefing different things, but I  
19 don't recollect any of their names at this time.

20 **Q. Okay. And then how about Reddit, who do**  
21 **you meet with from Reddit on the site**  
22 **integrity/trust and safety side as it relates to**  
23 **disinformation or malign foreign influence?**

24 A. His name is Tyler Otto. He is the head of  
25 data sciences at Reddit.



1           **Q.    Anyone else at Reddit who you meet with**  
2 **about those topics?**

3           A.    Yes.  The -- his senior manager is named  
4 Aylea Baldwin.

5           **Q.    Is that A-l-i-a?**

6           A.    A-y-l-e-a.

7           **Q.    All these officials you have talked about**  
8 **from these various social media platforms --**  
9 **Facebook, Google, Twitter, Yahoo!, Reddit -- these**  
10 **are all people that would have authority over**  
11 **enforcing terms of service at their respective**  
12 **platforms, correct?**

13           MR. SUR:  Objection; mischaracterizes the  
14 testimony and calls for speculation.

15           THE WITNESS:  That is my understanding.  I  
16 don't know if they have the authority, but they  
17 will at least inform the decision-makers, whoever  
18 they may be.

19           **Q.    BY MR. SAUER:  But they'd be directly**  
20 **involved in the enforcement of terms of service for**  
21 **these various platforms; is that fair to say?**

22           A.    That is my understanding.

23           **Q.    And that includes, of course, content**  
24 **modulation of content on the platforms, right?**

25           MR. SUR:  Objection; vague, calls for

1 speculation.

2 THE WITNESS: That is my understanding.

3 Q. BY MR. SAUER: Turning back to your  
4 thesis, you talk about (as read) "being in the  
5 trenches with you as you worked to protect the 2020  
6 elections." Were there any other steps you took in  
7 the trenches other than those -- these, I guess,  
8 information sharing meetings you have described  
9 with those, I think, seven platforms?

10 MR. SUR: Objection; vague.

11 THE WITNESS: Yes. One of the things that  
12 I did more frequently was San -- FBI San  
13 Francisco's territory includes 16 counties. So I  
14 provided them, the county registrar or county  
15 clerk's offices, their information security  
16 personnel, with monthly cybersecurity updates and  
17 guidance.

18 Q. BY MR. SAUER: And so that would involve  
19 advising county clerks and registrars how to fend  
20 off hacking attempts?

21 A. Yes. I would -- I would share indicators  
22 with them -- I would share the same type of  
23 information that I shared with social media  
24 companies, to a more limited extent. I would share  
25 strategic information about what we saw

1 foreign-state-sponsored actors doing.

2 And then where appropriate, we would share  
3 indicators with companies, but these were not --  
4 these would primarily be IP addresses and domain  
5 names so that they could see if they were popping  
6 up anywhere on their networks.

7 **Q. I am going to jump ahead in your thesis to**  
8 **Page 17 of the main text.**

9 MR. SAUER: And Indraneel, if you're --  
10 are you following along on your iPad?

11 MR. SUR: I am trying, yes.

12 MR. SAUER: I think this is going to be  
13 Page 41 of -- Page 41 of the -- of the PDF.

14 **Q. Agent Chan, can you see the screen share**  
15 **in front of you well? I have made it a little**  
16 **smaller to make it easier for me to read.**

17 A. Yeah. I can see the -- there's part of  
18 one paragraph and the beginning of a second  
19 paragraph.

20 **Q. Can you see there that there's -- you**  
21 **refer to "DiResta" there at the top of the page?**  
22 **Do you see what I've highlighted?**

23 A. Correct.

24 **Q. Who is DiResta?**

25 A. Renée DiResta is a researcher at the

1 Stanford Internet Observatory.

2 Q. And -- and so do you know her personally?

3 A. I have engaged with her on phone calls.

4 Q. What were the nature of those phone calls?

5 A. The nature of these phone calls were  
6 actually related to threats being directed at her  
7 as well as about Russian disinformation.

8 Q. Okay. And you -- threats being directed  
9 at her, you mean someone had personally made  
10 threats at her, and you were, as an FBI agent,  
11 relating them back with her; is that fair to say?

12 A. That is -- that is correct. And the  
13 threats would be --

14 Q. And were the threats -- I don't want to --

15 A. The threats were --

16 Q. Go ahead. Sorry. I didn't mean to  
17 interrupt you.

18 A. The threats were of an online nature that  
19 were -- that she was concerned may be  
20 state-sponsored in nature.

21 Q. Oh, okay. Okay. And that -- what -- and  
22 then what was the second thing that you said that  
23 you were engaged with her on?

24 A. A lot of conversations about Russian  
25 disinformation.

1           **Q.    Yeah.  What did you say to each other**  
2           **about Russian disinformation?**

3           A.    I was mostly listening, but -- and I would  
4           ask her for her thoughts about what she was seeing  
5           from the Internet Observatory.

6           **Q.    Did you have these conversations in**  
7           **connection with writing your thesis, or was it in**  
8           **connection with your work as an FBI agent in the**  
9           **field?**

10          A.    It was connected to my work as an FBI  
11          agent in the field.

12          **Q.    When did you talk to Renée DiResta?**

13          A.    I want to say maybe in 2019.

14          **Q.    Would that be the only time?**

15          A.    Yeah.  I can only recollect two phone  
16          calls that I had with -- with her.

17          **Q.    And those would have been in 2019?**

18          A.    Yes.

19          **Q.    Do you know why you called her?**

20          A.    She called me on the first call to --

21          **Q.    Why did she call you?**

22          A.    To -- she had been given my contact  
23          information by the head of the Stanford Internet  
24          Observatory, and she was concerned about Russian  
25          actors either providing her -- or -- giving her

1 online threats or potentially slotting her.

2 Q. Okay. Who is the head of the Stanford  
3 Internet Observatory?

4 A. Alex Stamos.

5 Q. Do you know Mr. Stamos?

6 A. I do.

7 Q. How do you know him?

8 A. I know him from his time as the chief  
9 security officer for Facebook.

10 Q. And was he one of the Facebook officials  
11 that you interacted with in your professional  
12 capacity as an FBI agent when he was there?

13 A. Yeah, when he was there, but he was not --  
14 he left before the 2020 election cycle.

15 Q. Was he involved in any of the meetings  
16 you've talked about where malign-foreign-influence  
17 activities were discussed?

18 A. He was involved in a few, but he left it  
19 to the people that I mentioned who reported to him.

20 Q. So when did he leave Facebook?

21 A. I can't remember, but it was ahead of the  
22 2020 election cycle.

23 Q. So -- do you think he would have left  
24 before 2020 began or during 2020?

25 A. I think he left well before 2020. I think

1 he left after the midterms, but I can't remember.

2 **Q. You mean the 2018 midterms?**

3 A. I'm sorry. Yeah. The 2018 midterm  
4 elections.

5 **Q. Okay. Have you had any discussions with**  
6 **Mr. Stamos since he left Facebook?**

7 A. Yes. But not about Russian  
8 disinformation.

9 **Q. Generally what have they been about?**

10 A. Cybersecurity and trust and safety.

11 **Q. What is trust and safety?**

12 A. Trust and safety is protecting platforms  
13 from hacking and -- yeah, I -- primarily hacking.

14 **Q. Have you had any discussions with him**  
15 **about protecting platforms from, you know,**  
16 **malign-foreign-influence activities?**

17 A. No.

18 **Q. No?**

19 A. Not since -- not since the -- you know,  
20 before the 2018 midterm elections. Not in his  
21 current capacity at the Stanford Internet  
22 Observatory.

23 **Q. Lower down on the page you see I have**  
24 **highlighted a reference to Professor Kate Starbird.**  
25 **Do you see that?**

1 A. Yes.

2 Q. Do you know Kate Starbird?

3 A. I do not know her personally.

4 Q. Have you ever talked to her to your  
5 recollection?

6 A. I have never talked to her.

7 Q. Okay. So you're -- you only -- you only  
8 reference her research in your thesis, but you have  
9 never talked to her?

10 A. That is correct.

11 Q. Are you familiar with the Stanford  
12 Internet Observatory and the University of  
13 Washington teaming up on something called the  
14 "Election Integrity Partnership"?

15 A. I am generally aware of that.

16 Q. Okay. What do you know about the Election  
17 Integrity Partnership? What is it, if you know?

18 MR. SUR: Objection; vague.

19 THE WITNESS: My knowledge is just  
20 general. So I knew they partnered on election  
21 integrity and I knew that there was research  
22 involved, but that's the extent of my knowledge.

23 Q. BY MR. SAUER: How do you know that?

24 A. I think I read it somewhere in a news  
25 article.



1           **Q.    Have you ever talked to anyone involved in**  
2           **the Election Integrity Partnership?**

3           A.    Not that I'm aware of.

4           **Q.    Did you have any involvement in it?**

5           A.    No.  I would have known.  So no, not that  
6           I'm aware of.

7           **Q.    How about any other federal agencies, are**  
8           **you aware of them being involved or working with**  
9           **the Election Integrity Partnership?**

10          A.    I am not aware of any other federal  
11          agencies.

12          **Q.    And then would that include the FBI?  Do**  
13          **you know if the FBI has had or if it is involved in**  
14          **any way with the Election Integrity Partnership?**

15          A.    I do not have any knowledge of that.  
16          However, I know that my colleagues at FBI  
17          headquarters regularly meet with researchers much  
18          more frequently than I do.

19          **Q.    So is it possible that your colleagues at**  
20          **FBI headquarters meet with Alex Stamos?**

21                 MR. SUR:  Objection; calls for  
22          speculation.

23          **Q.    BY MR. SAUER:  If you know.**

24          A.    Not to my knowledge, because since Alex  
25          Stamos is at Stanford and Stanford is located in

1 FBI San Francisco's territory, it is common  
2 courtesy to ask the field office to broker the  
3 meeting or to at least make them aware that they  
4 are coming into the territory. So I am not aware  
5 of any of them meeting with Alex Stamos.

6 **Q. What researchers out there in California**  
7 **are you aware that they have met with other than**  
8 **Mr. Stamos?**

9 A. I am aware that they have at least had  
10 discussions with a researcher at University of  
11 California at Berkeley, Professor Hany Farid.

12 **Q. How do you spell that?**

13 A. H-a-n-i [verbatim]; and I believe his last  
14 name is F-a-r-e-e-d, but it could be F-a-r-i-d. I  
15 am not sure.

16 **Q. Any other researchers you are aware of**  
17 **them meeting with?**

18 A. That's the only one in my territory that I  
19 am aware of them meeting with.

20 **Q. How about Kate Starbird, do you know if**  
21 **they've ever met with her at FBI headquarters?**

22 A. I am not aware.

23 **Q. I want to jump ahead in your thesis to**  
24 **Page 25.**

25 MR. SAUER: And, Indraneel, it is Page 49

1 in the PDF.

2 Q. Earlier, Agent Chan, you testified that  
3 there is kind of two kinds of Russian influence  
4 operations that you discussed in the thesis. I  
5 think you referred to hack-and-dump operations,  
6 right?

7 A. That's correct.

8 Q. And that's a -- a reference to hackers  
9 reaching into a computer network, stealing data and  
10 then kind of publicizing it, right?

11 A. Yeah, that's correct.

12 Q. And then here you also refer to "attempted  
13 hacks on the" -- "the actual voting systems," but  
14 you say that that's not the focus of your thesis,  
15 right?

16 A. Yeah, that is correct.

17 Q. Then here, I think in this next paragraph,  
18 where you refer to "Online social media influence  
19 campaigns," that's what's your thesis actually  
20 focuses on in this document, right?

21 A. That is correct.

22 Q. Okay. At a high level, can you describe  
23 what sorts of online social media influence  
24 campaigns have been conducted by the Russians?

25 A. So broadly speaking, they have -- they --

1 and when I mean "they," I mean the Internet  
2 Research Agency and other Russian state-sponsored  
3 actors -- have news -- have created fake social  
4 media accounts, and they have either generated  
5 disinformation themselves or they have amplified  
6 existing content from current users of the social  
7 media platforms.

8 **Q. So they generate their own disinformation.**  
9 **What does that entail?**

10 A. So they make their own content.

11 **Q. Okay. So can you -- can you give us a**  
12 **specific example of what that might look like?**

13 A. Like -- like they -- they will make their  
14 own Facebook postings. They will -- they will copy  
15 other people's Facebook postings. And they will --  
16 I mean, when I say "content," they try to find what  
17 are the hot-button or current issues in the news  
18 around the time frame they're looking at, and then  
19 they will try to either generate content --

20 **Q. Okay.**

21 A. -- themselves related to that or they will  
22 amplify existing content.

23 **Q. Okay. So they might -- we'll say -- or**  
24 **suppose there's a hot-button issue, and they will**  
25 **create some inflammatory Facebook post and push**

1 that out into social media, that's one thing they  
2 do?

3 A. Yes.

4 Q. And I take it the goal there is they are  
5 trying to get ordinary, real people on social  
6 media, including Americans, to kind of interact  
7 with or engage with that content, right?

8 MR. SUR: Objection; vague, calls for  
9 speculation.

10 THE WITNESS: That is my understanding, is  
11 that in general the Russian government and the  
12 Internet Research Agency want to sow discord in the  
13 American online environment.

14 Q. BY MR. SAUER: So the goal there is to  
15 have -- they post messages that they anticipate  
16 will be divisive and try and get Americans to  
17 engage with them, right?

18 A. Yeah. That is my understanding.

19 Q. And "engagement," I take it, can mean  
20 multiple things on a social media platform. That  
21 might mean reading the post. That would be a form  
22 of engagement, right?

23 A. Yes, sir. Yeah. The -- so the  
24 companies -- I use the companies' definition. And  
25 when they say "engagement," they do -- they mean

1 different things as well. Like you said, viewing  
2 is one of the types of engagement. And they will  
3 let us know, "Hey, Elvis. You shared this IP  
4 address with us. We found these accounts, and they  
5 had low-level engagement."

6 And when I ask, "What is low-level  
7 engagement?" they will typically characterize it  
8 as, "Oh, there was, you know, a dozen views."

9 **Q. Right. Whereas high-level engagement**  
10 **might be a million views, right?**

11 A. Yes.

12 **Q. Okay. Or 100,000 views might be a**  
13 **high-level engagement, fair to say?**

14 A. Yeah. Yeah, that's fair.

15 **Q. And then, you know, liking or disliking a**  
16 **post is another kind of engagement; is that fair to**  
17 **say?**

18 A. For the Facebook and Instagram platforms  
19 specifically.

20 **Q. Yeah. Or -- and then doesn't Twitter have**  
21 **a kind of function that you can kind of express**  
22 **approval or disapproval in that way?**

23 A. Yeah. I believe so.

24 **Q. Is that -- do you know what that's called?**

25 A. I can't remember the name for it.

1 Q. And it's the equivalent of liking  
2 something on Facebook. You could, you know, like a  
3 tweet, essentially; is that fair to say?

4 MR. SUR: Objection; vague.

5 THE WITNESS: I would assess them as being  
6 similar.

7 Q. BY MR. SAUER: Yeah. And then there's --  
8 again, and obviously reposting it is another form  
9 of engagement, right?

10 A. That is correct.

11 Q. And also there's reposting it with  
12 commentary as well, right?

13 A. That is correct.

14 Q. And I take it these are all forms of  
15 engagement that these social media influence  
16 campaigns that you are referring to in your thesis  
17 are kind of designed -- at least they are trying to  
18 get people to do that, at least regular, you know,  
19 kind of not real users, not bots; the Russians are  
20 trying to get people to engage on their divisive  
21 content, right?

22 MR. SUR: Objection; calls for  
23 speculation.

24 THE WITNESS: Yeah. So it is my opinion  
25 that, you know, based on what I know, that that is

1 what the Russians -- Russians are attempting to do.

2 Q. BY MR. SAUER: I take it from your thesis  
3 that they have met with mixed success in these  
4 efforts, right? In some of their efforts they were  
5 highly effective in getting high levels of those  
6 kinds of engagements, whereas others it would --  
7 kind of fizzled; is that fair to say?

8 A. Yes. I would say it was hit and miss.

9 Q. And I think you -- in your thesis you talk  
10 about how in 2016 they had high, high levels of  
11 success, right, because there were essentially no  
12 countermeasures taken by social media platforms?

13 A. That is correct.

14 Q. And I think you cite examples of  
15 situations where there are Russian-originated  
16 content with hundreds of thousands or -- I think  
17 you talk about millions of Americans interacting  
18 with it, you know, liking it, disliking it,  
19 reposting it and all that; is that fair to say?

20 MR. SUR: Objection; compound.

21 THE WITNESS: That is for the 2016  
22 election cycle.

23 Q. BY MR. SAUER: And then I take it maybe  
24 there was -- there was some engagement in the 2018  
25 and 2020 election cycles, but probably not quite as



1 much as in 2016, right?

2 A. That is correct.

3 Q. How would you kind of characterize the  
4 levels of engagement? You know, the various forms  
5 of engagement I have talked about -- reading it,  
6 liking it or disliking it, reposting it or  
7 reposting it with commentary -- how do those levels  
8 of engagement in general with the kind of Russian  
9 malign content, what levels were those at in 2016  
10 and 2018?

11 MR. SUR: Objection; compound.

12 THE WITNESS: Well, on Page 35 I give one  
13 example where you can see how IRA controlled  
14 accounts and the numbers of users they reached.  
15 And so -- on Page 35, you see that table, right?

16 So those are the types of numbers. And  
17 then after that, you know, when we compare to 2020,  
18 it's less.

19 Q. BY MR. SAUER: Okay. It is not --

20 A. But those are the numbers that were, you  
21 know, provided. I think these -- I think that I  
22 footnoted that it's from -- it's from the special  
23 counsel's report.

24 Q. I got you. That's from Robert Mueller's  
25 report?

1 A. That is correct.

2 Q. That indicates that there were really a  
3 very high level of number of users reached from  
4 Facebook, 126 million users reached by 2016 Russian  
5 messages, fair to say?

6 A. Yes.

7 Q. And I take it that, you know, some subset  
8 of those people are reading it, or at least  
9 clicking on it to read it; is that fair to say?

10 A. Yeah. So the "Number of Users Reached,"  
11 my interpretation is that is views.

12 Q. Got you.

13 A. Unique views, yeah.

14 Q. Some of them, but we just don't know how  
15 many, but some of them would have liked it or  
16 disliked it, fair to say?

17 A. Yeah, I have no idea how many would have  
18 liked it or disliked it.

19 Q. And then some of them -- some may have  
20 reposted it, right?

21 A. They may have, but I don't know.

22 Q. And then that Twitter figure shows -- what  
23 is it -- about 1.4 million Twitter users were  
24 reached by these activities in 2016?

25 A. Yes, that is correct.

1 Q. Let's -- I am going to flip back to Page  
2 29. You've got this kind of graphic picture of --  
3 of Hillary Clinton with a black kind of "X" painted  
4 on her face. Do you see that?

5 A. Yes.

6 Q. And I take it this is an example of  
7 something that was -- it is actually  
8 Russian-originated content kind of masquerading as  
9 something posted by an American, right?

10 A. Yeah. That is an example.

11 Q. And this is the sort of thing that  
12 might -- is this the sort of thing that would have  
13 resulted in engagements by users?

14 MR. SUR: Objection; vague, calls for  
15 speculation.

16 THE WITNESS: Well, from this one, there  
17 appeared to be 763 reactions.

18 Q. BY MR. SAUER: Do you know what  
19 "reactions" mean? Is that liking or disliking, or  
20 is that something else?

21 A. I am not -- I am not familiar.

22 Q. Okay. So that might mean -- might mean  
23 liking or disliking, but it might also mean  
24 reposting?

25 A. Yeah. I don't know.

1           **Q.**    So at least 763 people for this example  
2    **did something more than just reading it, right, or**  
3    **viewing it?**

4           MR. SUR:  Objection; calls for  
5    speculation.

6           THE WITNESS:  Yeah.  I don't know what a  
7    reaction means.  It could just mean viewing it, but  
8    it could mean taking some further action.

9           **Q.**    **BY MR. SAUER:  And the next step, 76**  
10   **people commented on this, right?**

11          A.    Yes.

12          **Q.**    **And then those comments are people who**  
13   **presumably said something, whether they agree or**  
14   **disagree or just want to say something about this**  
15   **kind of political ad, fair to say?**

16          MR. SUR:  Objection; calls for  
17    speculation.

18          THE WITNESS:  Yeah.  I don't know what the  
19    nature of the comments are, but your  
20    characterization is probable.

21          **Q.**    **BY MR. SAUER:  The accounts -- I suppose**  
22   **you have talked about account takedowns earlier.**  
23   **If this account that posted this ad is taken down,**  
24   **do all those comments get taken down with it?**

25          MR. SUR:  Objection; calls for

1 speculation.

2 THE WITNESS: I don't know.

3 Q. BY MR. SAUER: Oh, so you think that the  
4 comments may stay up with the account gone?

5 A. I -- to be honest with you, I do not use  
6 any social media.

7 Q. I see. So you don't know if -- you don't  
8 know if the comments kind of remain floating out on  
9 Twitter when the underlying picture of Hillary  
10 Clinton with black paint on her face is taken down?

11 A. I do not know.

12 Q. Turning to the next page of your thesis,  
13 Page 30, here in this Subsection a you talk about  
14 "The IRA's Social Media Activities," right?

15 A. Correct.

16 Q. Okay. And the "IRA" is the "Internet  
17 Research Agency," right?

18 A. In this context, correct.

19 Q. Right. Not in the Ireland separatist  
20 context.

21 Just generally speaking, can you describe  
22 what the IRA is in this context?

23 MR. SUR: Objection; vague.

24 THE WITNESS: So in this paragraph I  
25 describe the three lines of activities that I

1 observed the IRA doing in terms of malign-influence  
2 campaigns.

3 Q. BY MR. SAUER: Okay. And the first one  
4 you say is they "made and maintained fake user  
5 accounts and pages on social media platforms that  
6 covered a range of political issues," right?

7 A. That is correct.

8 Q. And that's a bit like what we have already  
9 been talking about, where they're -- I take it they  
10 are creating fake accounts and pages and trying to  
11 gather American viewers to review and engage with  
12 their content, right?

13 MR. SUR: Objection; vague, calls for  
14 speculation.

15 THE WITNESS: That is my assessment, yeah.

16 Q. BY MR. SAUER: And it says, "For these  
17 accounts and pages, the IRA employees generated  
18 organic content to ingratiate themselves with  
19 online communities and amplify or steer the themes  
20 discussed in those communities," correct?

21 A. Yes, that is what I wrote.

22 Q. And they were trying to influence online  
23 conversations involving real American citizens,  
24 right?

25 A. That was my assessment and is my

1 assessment.

2 Q. All right. So that, I take it, would  
3 involve the kind of active engagement that we  
4 talked about a minute ago: not just reading what  
5 they say, but maybe reposting it, commenting on it,  
6 you know, and having a higher level of engagement  
7 than just viewing it, right?

8 MR. SUR: Objection; compound and calls  
9 for speculation.

10 THE WITNESS: That would be my  
11 understanding.

12 Q. BY MR. SAUER: You go on to say,  
13 "Second" -- and this ties back to something I think  
14 you foreshadowed a minute ago -- "IRA employees  
15 used social media bots, i.e., computer programs  
16 which control social media accounts, to amplify  
17 existing content," right?

18 A. That is correct.

19 Q. What is it to "amplify existing content"?

20 A. It is to do the things that you had  
21 mentioned. Depending on what the social media  
22 platform were, they include things like liking it  
23 or reposting it.

24 Q. So social media bots, those are kind of  
25 fake accounts, right, that don't have real human

1 **beings behind them; is that what that means?**

2 A. Yes. They are controlled by computer  
3 programs.

4 Q. And so -- and -- and sometimes they will  
5 have, like, a fake picture so it looks like a real  
6 human being; but actually it is just a computer  
7 program, right?

8 A. That is correct.

9 Q. And so the social media -- I take it the  
10 IRA-generated social media bots to go out there,  
11 find the divisive messages that the IRA wanted to  
12 sort of amplify, and have them engage with those  
13 posts, correct?

14 MR. SUR: Objection; compound, calls for  
15 speculation.

16 THE WITNESS: I wouldn't say they  
17 generated the bots. In general, people rent bots.

18 Q. BY MR. SAUER: That's interesting. How do  
19 you rent a bot?

20 A. In the cybersecurity industry, there is a  
21 role called a bot herder, so someone who develops  
22 malicious software and finds unprotected devices  
23 and infects them with malicious software, also  
24 known as malware; and then they will advertise on  
25 the dark web that, you know, you can rent a botnet



1 for -- you know, a botnet of a certain size for a  
2 certain amount of money.

3 And that is what I am assessing the  
4 Internet Research Agency did.

5 **Q. Got you. Okay. So do you know for sure**  
6 **whether they generated their own or bought them on**  
7 **the dark web or rented them?**

8 A. So I'm not -- I'm not sure how they  
9 acquired them. I was just -- I didn't feel  
10 comfortable saying they generated their own.  
11 Somehow they were able to get control of a botnet  
12 and then use them to amplify.

13 **Q. And then "amplify," I take it that means**  
14 **things like liking and reposting and taking steps**  
15 **like that that make it -- is that fair to say?**  
16 **It's liking, reposting, stuff like that; is that**  
17 **right?**

18 MR. SUR: Objection; vague, calls for  
19 speculation.

20 THE WITNESS: Yeah. That would be my  
21 assessment.

22 **Q. BY MR. SAUER: Okay. And so I take it the**  
23 **Russian bots go out there and they find the**  
24 **divisive messages that the Russians want to push,**  
25 **and then they amplify them by having fake user**

1 **accounts like them or retweet them or repost them**  
2 **on Facebook, fair to say?**

3 A. I don't think the bots do that themselves.  
4 The bots don't have any intelligence. I would -- I  
5 believe that a human being, an actual Internet  
6 Research employee would find divisive content or --  
7 yeah, divisive content or users who had lots of  
8 followers and then deploy the bots to amplify those  
9 users' messages or content.

10 **Q. And part of this, I take it, is the bots,**  
11 **the fake accounts, having their own followers,**  
12 **trying to collect their own real followers, right?**

13 A. In my experience, the bots typically don't  
14 care how many followers they have. Their primary  
15 job is to amplify other content.

16 **Q. I got you. So in other words, suppose --**  
17 **and when you say "other content," this is content**  
18 **that wasn't originated by Russians or the IRA but**  
19 **is generated by American citizens with views that**  
20 **the IRA likes or wants to push, right?**

21 MR. SUR: Objection; vague, calls for  
22 speculation, assumes facts not in evidence.

23 THE WITNESS: By "other content," I mean  
24 content not generated by the bots.

25 **Q. BY MR. SAUER: And that's because the --**

1           A.     Because bots -- yeah. Bots will generate  
2 their own content, but they're -- it is usually  
3 nonsense talk or just, like, random images. The --  
4 that's what I meant by "other."

5           **Q.     Right. And then -- I think that -- and**  
6 **that's what you referred to in the previous**  
7 **sentence as "organic content," right?**

8           A.     Yeah. "Organic content," I mean that it  
9 is actually generated by Internet Research Agency  
10 employees.

11          **Q.     Oh, okay. So "existing content" in this**  
12 **sentence that I have highlighted is different than**  
13 **"organic content." "Existing content" is stuff**  
14 **that is already out there on the social media**  
15 **platforms; is it fair to say?**

16          A.     That is correct.

17          **Q.     That would be stuff that can be posted by**  
18 **other users or come from any other source, but it**  
19 **is just stuff --**

20          A.     Yeah.

21          **Q.     -- that they like and they want to push**  
22 **those messages, right?**

23                 MR. SUR: Objection; vague, compound.

24                 THE WITNESS: Yes. I mean not generated  
25 by the Internet Research Agency. That is what I

1 mean by "other content."

2 Q. BY MR. SAUER: If a bot that's operated by  
3 the Internet Research Agency were to repost, like,  
4 a -- an American citizen's tweets or Facebook page  
5 and then that bot account were taken down or shut  
6 off, would that reposting or amplification of that  
7 message then go away?

8 MR. SUR: Objection; compound and  
9 hypothetical.

10 Q. BY MR. SAUER: If you know.

11 A. I don't know.

12 Q. Now, then suppose there's John Smith, who  
13 is an American citizen who posts an aggressive,  
14 pro-Second Amendment message. And the Russian bot  
15 identifies that as something to amplify and  
16 retweets it, and then the Russian bot account is  
17 shut down. There's an account takedown. Does that  
18 retweeting of John Smith's pro-Second Amendment  
19 message go away from Twitter if there's no account  
20 there anymore to retweet it?

21 MR. SUR: Objection; hypothetical, calls  
22 for speculation, assumes facts not in evidence.

23 Q. BY MR. SAUER: If you know.

24 A. Yeah. I don't know. I don't know what  
25 happens to the retweet.

1 MR. SUR: Counsel, if I may, are we at a  
2 near or natural breaking point? We have been in  
3 this session for now approaching one hour and a  
4 little bit past that. Why don't we take a break  
5 if --

6 MR. SAUER: Yeah. That's -- now is as  
7 good a time as any.

8 MR. SUR: Thank you.

9 THE VIDEOGRAPHER: Off the record -- off  
10 the record at 10:45 a.m.

11 (Whereupon a recess was taken.)

12 THE VIDEOGRAPHER: Back on record at 10:58  
13 a.m.

14 Q. BY MR. SAUER: Agent Chan, sticking to  
15 Page 30 of your thesis, I want to direct your  
16 attention to this next sentence, where you say (as  
17 read), "Third, IRA employees covertly purchased  
18 online advertisements from social media companies  
19 to enhance their organic content and drive online  
20 traffic to the sites controlled by them," right?

21 A. Yeah. That is what I wrote.

22 Q. Yeah. And you agree with it, right?

23 A. Yes. You will see the footnote that it  
24 was by Professor Howard, but I agree with it.

25 Q. Okay. And then so the idea is the -- that

1 they would purchase ads that would drive traffic by  
2 real people to their -- their sites, basically  
3 their accounts and their websites as well, right?

4 A. Yes. This is in the 2016 election  
5 contest.

6 Q. Okay. So why do you say -- did something  
7 different happen in 2018 and 2020?

8 A. Yes. From my meetings with the companies,  
9 they shared with me that they had changed their  
10 policies to do more intensive validation of people  
11 trying to purchase political advertisements.

12 Q. And so it was harder for them to buy ads  
13 basically in the later election cycles?

14 A. That is my understanding.

15 Q. But either way, the purpose here is for  
16 them to be driving or achieving engagement by real  
17 users, right?

18 MR. SUR: Objection; vague, calls for  
19 speculation.

20 THE WITNESS: Yes. I believe the purpose  
21 was for the Internet Research Agency, who are  
22 comprised of Russian citizens, to drive engagement.

23 Q. BY MR. SAUER: Got you. And if you skip  
24 ahead a couple more pages, to Page 32, do you see  
25 these ads that you've identified in your thesis in

1 **Figure 3 and Figure 4?**

2 A. Yes, I see those ads.

3 Q. Okay. And these are, I take it -- you  
4 talk about how they have, like, left-wing content  
5 that's actually designed to -- to depress voter  
6 turnout among minority communities, right?

7 A. This was what the research that I reviewed  
8 said.

9 Q. Yeah. And you look at Figure 3 -- well,  
10 let me ask you this. You talk about the research  
11 you reviewed. You also are personally involved in  
12 this, quote, in the trenches, right?

13 MR. SUR: Objection; vague, misstates the  
14 record.

15 THE WITNESS: Can you clarify that  
16 question?

17 Q. BY MR. SAUER: Let me ask this: Is the  
18 research -- you said this is what your research  
19 indicated. Is the research in your thesis  
20 consistent with your experience as an FBI agent who  
21 deals with disinformation and  
22 malign-foreign-influence campaigns?

23 A. So the research, to include this reporting  
24 from the House Permanent Select Committee on  
25 Intelligence as well as what was conveyed to me by

1 the social media companies, was this content. I  
2 would otherwise not know because -- I mentioned to  
3 you I do not go on any social media platforms  
4 myself.

5 **Q. So but your understanding, for example, is**  
6 **Figure 3 is Russian-originated content. Your**  
7 **understanding of that is based on information**  
8 **obtained from the social media platforms or from**  
9 **other federal government officials, correct?**

10 A. Yeah. This information is specifically  
11 from the HPSCI report that I cited in the footnote.

12 **Q. Got you. And just looking at this, for**  
13 **example, in Figure 3 on the right, there's a Black**  
14 **Matters ad, correct?**

15 A. Yeah. "Figure 3. Facebook Political Ads  
16 Targeting Black voters."

17 **Q. And that one indicates that 223,799 people**  
18 **had liked it, right, on Facebook?**

19 A. Yes. That is what the image on the right  
20 says.

21 **Q. And so that would be a high level of**  
22 **engagement based on what you said earlier, right?**

23 A. I would not consider 223 views as being  
24 high.

25 **Q. Oh, is it 223,799?**



1           A.    No.  This one, the -- I see "223," and  
2   then I see a slash, "99 people like this."

3           Q.    Oh, is that what that means?  I thought  
4   that was a "7."  So you say -- what is -- do you  
5   know -- how do you read that?  What does that mean?

6           A.    Yeah.  I read that as 223 viewed it and 99  
7   of those 223 like it.  That is how I interpret  
8   this.

9           Q.    So that would be a low level of  
10   engagement, correct?

11          A.    That is how I would personally  
12   characterize it.

13          Q.    And then below there, in Figure 4 there's  
14   a Secured Borders ad on the left with a "No  
15   Invaders Allowed" sign in front of the border.  Do  
16   you see that one?

17          A.    Yes.

18          Q.    In that one, it looks like 134,943 people  
19   liked that, correct?

20          A.    Yes.

21          Q.    And if that ad were taken down because it  
22   was identified to be part of a  
23   malign-foreign-influence campaign, all those likes  
24   would disappear from Facebook as well, correct?

25               MR. SUR:  Objection; calls for

1 speculation, assumes facts not in evidence.

2 THE WITNESS: Yeah. I do not know what  
3 happens to the likes if the ad disappears, but I  
4 know that the ad disappears.

5 Q. BY MR. SAUER: Right. You think that  
6 likes may stay out there, floating in -- floating  
7 in the social media platform, not addressing  
8 anything that's still there?

9 A. I don't know.

10 Q. Let me ask this: A like is a way of  
11 expressing --

12 A. I don't know what happens.

13 Q. A like is a way of expressing approval of  
14 something, right? It's basically saying "I agree  
15 with this" or "I like it," right?

16 A. Yes. But I don't -- what I'm saying to  
17 you, Mr. Sauer, is I don't know what happens to  
18 those likes.

19 Q. The -- but you know that the ad  
20 disappears?

21 A. Well, for example, if you're -- if you're  
22 a -- if you're a user --

23 (Discussion off the record.)

24 MR. SUR: Sorry. We are having difficulty  
25 hearing you, Mr. Sauer. It may be a connection

1 problem.

2 (Discussion off the record.)

3 MR. SAUER: Can you hear me now?

4 MR. SUR: Yeah, that's better.

5 **Q. BY MR. SAUER: Okay. Go ahead, Mr. Chan.**

6 MR. SUR: Okay.

7 THE WITNESS: So I don't know what  
8 happens. So, for example, if you were a user and  
9 you like this ad, I don't know, does it stay on  
10 your account? Or I don't know if it disappears  
11 from your account. I don't know what happens on  
12 the ad itself. So I don't know. I don't know  
13 the -- I don't know the mechanics of how online  
14 advertisements for these platforms work.

15 **Q. BY MR. SAUER: If you look at the ad to**  
16 **the right of that, the pro-Second Amendment ad that**  
17 **says "Defend the 2nd"?**

18 A. Yeah.

19 **Q. And do you see at the bottom it says,**  
20 **"96,678 people like this"?**

21 A. Yes.

22 **Q. Would that be a high level of engagement?**

23 A. I would characterize that as high.

24 **Q. And it's your testimony that you don't**  
25 **know what happens if that ad is pulled down to all**

1     **those likes?**

2           A.     And then --

3           **Q.     Do you think it is going to continue to be**  
4     **in people's individual feeds?**

5           A.     Yeah, I do not know what happens to the  
6     likes.

7           **Q.     Jumping ahead a couple pages, I think this**  
8     **is the page that you referred to earlier. You**  
9     **talked about how there was a very high level of**  
10    **engagement by the IRA in -- in 2016, right?**

11          A.     Yes. Where it says, "The sheer magnitude  
12    of the IRA's social media campaign," that sentence?

13          **Q.     Correct, yeah.**

14          A.     Yeah, yes, that is what I wrote.

15          MR. SUR: To clarify for the record, this  
16    is on Page 34 of the thesis?

17          MR. SAUER: Yeah. That would be Page 58  
18    of the PDF. Indraneel, do you see where we are?

19          MR. SUR: Yes, yeah.

20          **Q.     BY MR. SAUER: It's the bottom paragraph**  
21    **there. "The sheer magnitude of the IRA's social**  
22    **media campaign targeting the United States was**  
23    **unparalleled in the digital age," right, Mr. Chan?**

24          A.     That was my characterization of it.

25          **Q.     And it -- the research indicated that the**

1 IRA had uploaded a thousand videos on YouTube. Do  
2 you know what the level of engagement for those  
3 videos was?

4 A. I don't. And you can see from the  
5 citation that I am citing research done by Renée  
6 DiResta and her team.

7 Q. Got you. And that research indicates that  
8 the IRA had, quote, reached a significant number of  
9 American users: 59 percent on Facebook, 19 percent  
10 on Instagram and two percent on Twitter, right?

11 A. That is what Renée DiResta and her team  
12 found.

13 Q. So 59 percent. And this isn't just sort  
14 of bots, she found that specifically as to American  
15 users, in other words, real social media platform  
16 human beings, real people using social media  
17 platforms in America, right?

18 A. That is what I recollect. And this is in  
19 the context of the 2016 elections.

20 Q. Correct. And that -- that's 59 percent of  
21 Americans on Facebook were reached in some way, had  
22 some level of engagement with -- with  
23 IRA-originated content; fair to say?

24 A. That is her calculation.

25 Q. And you cite it as a reputable source in

1 your thesis, right?

2 A. Yes, I do.

3 Q. And do you know how much of that is --  
4 obviously we talked earlier how there's different  
5 kinds of engagement, like reading, liking,  
6 reposting, reposting with commentary, commenting.  
7 Do you know how much of that is -- that reaching of  
8 American users breaks down into those various  
9 categories?

10 A. I do not. I was not able to find that  
11 level of detail.

12 Q. Okay. Next page. You've referred to  
13 Table 1 before on Page 35 that points out that 126  
14 million --

15 A. Yeah.

16 Q. -- American Facebook users were reached in  
17 some way by content, right?

18 A. Yes, yeah. I was able to extract that  
19 from the report.

20 Q. Right below that you refer again to "the  
21 second line of effort," where they (as read)  
22 "amplified real user accounts whose identities,  
23 behavior, and content aligned with their strategic  
24 goals," right?

25 A. So yes. You can see I cited the Mueller

1 report. That's special counsel's report.

2 Q. And then you go on to cite a Clemson  
3 University study indicating that over 100,000 real  
4 people had their postings amplified by  
5 IRA-controlled social media bots, right?

6 A. Yes, that is correct.

7 Q. And you don't know what happens to those  
8 amplifications when the bots are detected and shut  
9 down?

10 A. I do not.

11 Q. I think in the thesis you talk generally  
12 about how there was virtually no reaction by the  
13 social media platforms in the 2016 election cycle  
14 to this Russian activity; is that right?

15 A. That is correct.

16 Q. But that changed, I take it, in the 2018  
17 and 2020 election cycles, at least to some degree?

18 A. That is correct, yes.

19 Q. How did it change?

20 A. Well, what I was told -- what I was told  
21 by the companies was that they used both technology  
22 as well as human beings to moderate or protect  
23 their platforms.

24 Q. Okay. And then can you break down that  
25 for me? On the technological side, what did they

1 **tell you they did?**

2 A. So they tell me that they used a different  
3 detection method. The shorthand for that is  
4 algorithms. But they will not get into any of the  
5 details about the algorithms. And we have probed  
6 them to ask for details, but it has never been  
7 shared with us.

8 **Q. What -- you say you probed them to ask**  
9 **about the details. What did you ask?**

10 A. I can't remember exactly, but we would  
11 ask, for example, "What are the parameters that you  
12 use to develop the algorithm? Or what are the  
13 factors that you use?" And they would not share  
14 any of that information with us.

15 **Q. Why did you want to know that? Did you**  
16 **want to know -- did you want to ascertain if the**  
17 **algorithms were effective? Or why would you ask**  
18 **them a question like that?**

19 A. The reason that I would ask that question  
20 is so that we could make sure that we were sharing  
21 the most effective and actionable type of  
22 information with them.

23 **Q. Explain that to me. What -- if you know**  
24 **how their algorithm operates, how does that help**  
25 **you share actionable information?**



1           A.     So, for example, if a platform doesn't  
2     need a telephone number for an account, then  
3     providing them with Russian telephone numbers would  
4     not be useful. Or if providing them with an email  
5     account is not something that the platform saves,  
6     then that would not be useful. So those are two  
7     examples.

8           **Q.     Uh-huh. But they just tell you, "We use**  
9     **algorithms to detect kind of Russian-originated**  
10    **content," but they tell you nothing about how the**  
11    **algorithms operate?**

12          A.     That is correct.

13          **Q.     When did these conversations occur?**  
14    **Did -- where you're asking them about their**  
15    **algorithms and they are declining to provide**  
16    **information. Did they occur in those weekly,**  
17    **monthly and quarterly meetings we talked about**  
18    **earlier?**

19          A.     I would characterize it as occurring early  
20    in those quarterly meetings in the 2017 time frame;  
21    and after we asked the different companies and  
22    found that none of them were willing to share in  
23    those earlier meetings, we stopped asking.

24          **Q.     And then you mentioned human -- I think**  
25    **you mentioned human beings involved in their -- in**

1 **their activities. Tell us, what did they tell you**  
2 **about that?**

3 A. In general, what the companies tell us is  
4 the technology or the algorithms will flag specific  
5 content, and certain content that looks like spam  
6 is, I believe, taken down.

7 However, if something is flagged that  
8 requires a higher level of decision-making, that is  
9 when it is sent to a content moderator.

10 **Q. So a human being, a content moderator**  
11 **would be looking at, like, an account that was**  
12 **flagged by an algorithm as potentially involving**  
13 **malign, inauthentic activity and take a closer look**  
14 **at it?**

15 A. That is correct.

16 **Q. Did you discuss with them what standards**  
17 **their content modulators use to -- to figure that**  
18 **out, you know, how do they make their judgment**  
19 **calls?**

20 MR. SUR: Objection; compound.

21 THE WITNESS: So in response to your  
22 question, we would just broadly ask them what their  
23 terms of service or community standards were.

24 **Q. BY MR. SAUER: So how do you know that**  
25 **they have human beings involved in enforcing the --**

1 reviewing and enforcing the terms of service with  
2 respect to particular content?

3 A. Through the discussions that we had at the  
4 meetings.

5 Q. And what you have been saying, is this  
6 true of all the -- all the platforms?

7 A. I do not know. I am specifically thinking  
8 of two platforms that use human being content  
9 moderators.

10 Q. Which two are those?

11 A. I am specifically thinking of Facebook and  
12 YouTube.

13 Q. How about Twitter?

14 A. I don't know if they use human -- I have  
15 never -- I don't recollect discussing that with  
16 them.

17 Q. How about the others? You mentioned, I  
18 think, Yahoo! and Reddit, Instagram. Do they use  
19 human content moderators?

20 A. I don't recollect discussing that with  
21 them.

22 Q. You mentioned their terms of service. You  
23 know, did you ever discuss with them what their  
24 terms of service are or should be? Did you ever  
25 make recommendations that they change terms of

1 **service to make them more effective in addressing**  
2 **malign-foreign-influence activities?**

3 MR. SUR: Objection; compound and vague.

4 THE WITNESS: I will answer the last part  
5 of your compound question, which is no, we never  
6 told the companies to modify their terms of service  
7 or community standards.

8 **Q. BY MR. SAUER: Do you know how they**  
9 **developed their terms of service or community**  
10 **standards?**

11 A. Only from what they discussed with me in  
12 those meetings.

13 **Q. What did they say to you in those**  
14 **meetings?**

15 A. So --

16 MR. SUR: Objection; vague.

17 THE WITNESS: So in those meetings, we  
18 would not discuss them. We would ask them, "What  
19 are your terms of service related to detecting  
20 Russian troll accounts?"

21 And then they would share with us that  
22 the -- the two terms that come up regularly are  
23 "coordinated," which I interpret to mean across  
24 many accounts, and "inauthentic," which means the  
25 user is pretending to be someone they are not.

1           And so those were the two primary  
2 terms-of-service violations that I remember being  
3 discussed.

4           **Q. BY MR. SAUER: What does "coordinated"**  
5 **mean?**

6           A. Like, as I mentioned before, it was  
7 activities across multiple accounts, the -- similar  
8 activities across multiple accounts.

9           **Q. How does that violate terms of service?**

10          A. So in the cybersecurity context, you will  
11 have a botnet that will push ads, for example,  
12 Canadian pharmacy ads, to hundreds and thousands of  
13 users. That is coordinated behavior. That is  
14 illegal. Because if you wanted to push ads on a  
15 platform, typically you have to purchase online  
16 advertising.

17          **Q. Okay. Got you. And then what was the**  
18 **second category you mentioned of provisions of**  
19 **terms of service that these activities would**  
20 **violate?**

21          A. Inauthentic.

22          **Q. Yeah. And what is -- what is inauthentic?**

23          A. Inauthentic is a user pretending to be  
24 someone they are not.

25          **Q. And I take it that you got that in these**

1 Russian malign-foreign-influence activities, right?

2 A. Yes.

3 Q. We have been talking about Russia  
4 principally because that's your thesis, but do  
5 other countries try and do these kinds of  
6 disinformation malign operations on social media  
7 platforms as well?

8 MR. SUR: Objection; vague.

9 THE WITNESS: Yes.

10 Q. BY MR. SAUER: What countries are involved  
11 in them?

12 A. The two countries that we focus on are  
13 China and Iran, outside of Russia.

14 Q. Are there any others?

15 A. Not to --

16 MR. SUR: Objection; Counsel, we're at the  
17 law enforcement privilege.

18 MR. SAUER: I am going to withdraw the  
19 question. I don't concede the privilege applies,  
20 but I will withdraw the question if you guys --  
21 yeah.

22 Q. Just generally speaking, you mentioned,  
23 say, Iran and China and, frankly, they are also  
24 referred to in your publicly-available thesis. Are  
25 the sorts of activities that they engage in similar

1 to what Russia does, you know, in the -- the way of  
2 generating fake accounts, generating inauthentic  
3 content and trying to get Americans to interact  
4 with it?

5 MR. SUR: Objection; vague and compound.

6 THE WITNESS: In my experience, the  
7 Chinese state-sponsored activity and the Iranian  
8 state-sponsored activity share similarities to the  
9 Russian state-sponsored activities.

10 Q. BY MR. SAUER: We were talking -- moving  
11 back to what we were talking about a minute ago,  
12 you talked about how there are two general  
13 categories of content-modulation policies --  
14 coordinated activity and inauthentic activity --  
15 that get cited most frequently to remove this  
16 content; is that right?

17 A. In my personal experience, yes.

18 Q. And your personal experience is based on  
19 these meetings and conversations with  
20 representatives of the social media platforms,  
21 correct?

22 A. That is correct. You broke up on me, but  
23 I believe that is correct.

24 Q. I'm -- I'm sorry. Again, you can't hear.  
25 I am hearing you fine. Can you hear me okay?

1           A.     Now I can.

2           Q.     Okay.  Let me ask you this:  Do they --  
3     when you have these information exchanges, you  
4     provide the social media platforms with tactical  
5     information, which includes -- you know, identifies  
6     specific accounts and user -- or not users, but  
7     specific accounts and URLs that you have concluded  
8     are Russian-originated, right?

9           A.     Can you repeat the question?  You have  
10    been breaking up on me.

11           MR. SAUER:  Should we go off the record?

12           THE VIDEOGRAPHER:  Off the record at 11:22  
13    a.m.

14                     (Whereupon a recess was taken.)

15           THE VIDEOGRAPHER:  We are back on record  
16    at 11:27 a.m.

17           Q.     BY MR. SAUER:  Agent Chan, circling back  
18     to where we were a moment ago, I wanted to ask you,  
19     when you have these information sharing sessions  
20     with various social media platforms, you testified  
21     earlier that you give them tactical information,  
22     right?

23           A.     Yes.

24           Q.     Yeah.  And tactical information includes  
25     identifying specific social media accounts and URLs



1 and things of that nature, right?

2 A. Yes.

3 Q. Yeah. How often has that happened? I  
4 know in your thesis you refer to four  
5 publicly-available instances where there was that  
6 kind of information sharing. How often does it  
7 happen that the FBI will give a list of specific  
8 tactical information for the social media platforms  
9 to consider?

10 MR. SUR: I am going to object on the  
11 basis of the law enforcement privilege. And you  
12 can answer without -- insofar as you can without  
13 disclosing any particular investigation.

14 Q. BY MR. SAUER: Yeah, I don't want to know  
15 any particular URL, but just generally how often  
16 does that happen?

17 A. I would say in general it happens between,  
18 I don't know, one to five times per month.

19 Q. Okay. And then how many --

20 A. From different investigations.

21 Q. Oh, got you. Okay. And then how -- and  
22 does this actually occur at these meetings we've  
23 talked about, or are there separate communications  
24 where you pick up the phone and call the site  
25 integrity people and tell them, "Here are some bad

1 **URLs"?**

2 A. So --

3 MR. SUR: Objection; mischaracterizes the  
4 record, compound.

5 **Q. BY MR. SAUER: If you know.**

6 A. From my understanding of your question, we  
7 will typically share information either right  
8 before or after one of our quarterly meetings.  
9 That is pretty standard. Otherwise we will just  
10 share information from different investigations as  
11 deemed appropriate by the field offices running the  
12 investigations and FBI headquarters.

13 **Q. So -- so it would be both, I take it,**  
14 **there would be -- in every quarterly meeting you**  
15 **might identify -- or you do identify tactical**  
16 **information about foreign-originated URLs and user**  
17 **accounts, correct?**

18 A. I don't know if it happens at every single  
19 quarterly meeting, but I would say most of them.

20 **Q. And then -- and then apart from the**  
21 **quarterly meetings, I think you said one to five**  
22 **times a month there would be a communication of**  
23 **that nature through another channel, right?**

24 A. Correct. What I would typically do is  
25 send an email to the recipients at the companies

1 and inform them that I would be using a secure file  
2 transfer application within the FBI that is called  
3 Teleporter. And then the reason I would send them  
4 a heads-up email is because the Teleporter email  
5 with a link looks like spam, so I don't want them  
6 to think it's spam.

7 **Q. Okay. And that Teleporter email, if they**  
8 **open it, contains tactical information for them to**  
9 **consider, right?**

10 A. The Teleporter email contains a link for  
11 them to securely download the files from the FBI.

12 **Q. And the files contain tactical information**  
13 **that identifies malign foreign-originated URLs and**  
14 **social media accounts and things like that, right?**

15 A. Yeah, different types of indicators.

16 **Q. When you say "different types of**  
17 **indicators," indicators, I think you said earlier,**  
18 **refer to those specific URLs and social media**  
19 **accounts, right?**

20 A. Yeah. Those are two of them, but they  
21 also apply to IP addresses, email accounts. You  
22 had just mentioned two of the types of indicators,  
23 but I wanted to reiterate that there are a broad  
24 range of indicators that we share.

25 **Q. Does that Teleporter communication explain**

1 and -- provide an explanation of the FBI's basis  
2 for thinking that those are bad accounts or bad  
3 indicators?

4 A. In general it will typically provide a  
5 very short summary, maybe a sentence or two, that  
6 will say, "We assess that these accounts are being  
7 controlled by the Internet Research Agency," and  
8 then provide a list of accounts, or "We assess this  
9 IP address is being used exclusively by the  
10 Internet Research Agency from this time period to  
11 that time period." That is a typical type of  
12 information sharing.

13 Q. Typically how many accounts or URLs or  
14 other indicators would be identified in a  
15 communication like this?

16 A. It varies from one account or one selector  
17 to many, like a whole spreadsheet full of them.

18 Q. Can you estimate -- for example, in 2022,  
19 can you estimate how many specific indicators have  
20 been flagged for social media companies?

21 A. I can't really estimate that number. I  
22 can estimate that during 2020 I shared information  
23 with the companies between one to five or one to  
24 six times per month.

25 Q. And you -- and they -- and there could be

1 anywhere from one to a very large number, a whole  
2 spreadsheet full of indicators that you'd be  
3 flagging, fair to say?

4 A. That is fair. And when I say "large,"  
5 maybe hundreds, but not thousands. I don't ever  
6 recollect anything in the thousands, but maybe  
7 hundreds.

8 Q. And then -- and that happened one to five  
9 times a month in 2020, correct?

10 A. Yes.

11 Q. How about in 2022, did it also happen that  
12 frequently?

13 A. In my recollection, maybe one to four  
14 times a month.

15 Q. And then there would be a similar range of  
16 the number of indicators flagged in each incident?

17 A. I would say for the 2022 cycle, that we  
18 would not have in the hundreds. At the most it  
19 would be in the -- in the tens, in the dozens.

20 Q. And do you send these out to all the  
21 social media platforms? I think you mentioned  
22 seven or eight that you regularly meet with. And  
23 do they all get these Teleporter communications  
24 flagging bad indicators for them?

25 A. I would --

1 MR. SUR: Objection; mischaracterizes the  
2 record, vague.

3 THE WITNESS: I would say in general that  
4 the companies I mentioned to you before would  
5 receive these.

6 However, there would be some occasions  
7 that it would be company-specific information that  
8 we would not share across all the companies that I  
9 previously mentioned.

10 Q. BY MR. SAUER: So sometimes it would  
11 relate to all of them; sometimes it might be just a  
12 Facebook issue or a Twitter issue or something like  
13 that, fair to say?

14 A. I would say most of the time we would  
15 share with that list of companies, and a few of the  
16 times we would share with just one company or two  
17 companies.

18 Q. Okay. Do you ask them to kind of report  
19 back to you on whether they take any action on  
20 those?

21 MR. SUR: Objection; vague.

22 THE WITNESS: The typical language we  
23 would use is, "We would appreciate any information  
24 you're able to share back with us about this  
25 information and if you were to take any actions

1 based on this information."

2 **Q. BY MR. SAUER: And do they typically**  
3 **comply with that request?**

4 MR. SUR: Objection; vague.

5 THE WITNESS: I would say sometimes.  
6 Some -- I would say at every quarterly meeting we  
7 try to follow up to ask if information we shared  
8 has been relevant if we have not received a  
9 response yet.

10 However, the companies either say they  
11 don't have anything additional to share or they do  
12 not find anything based on the information we  
13 shared.

14 **Q. BY MR. SAUER: So sometimes they'll report**  
15 **back and say, "Hey, thanks for providing this**  
16 **information. We've taken down some of the**  
17 **accounts," or something like that? That happens**  
18 **sometimes, you say?**

19 A. That is correct. And when it happens,  
20 we -- I will document it, and the reason for that  
21 is because that helps us fine-tune the information  
22 that we're sharing.

23 **Q. Uh-huh. And then I take it sometimes they**  
24 **just -- they don't tell you what they did with it,**  
25 **right?**

1           A.     That is correct.

2           **Q.     But then every -- I take it at every**  
3           **quarterly or monthly meeting, you usually follow up**  
4           **and ask them, "Hey, did you take any actions on**  
5           **these reports we made," right?**

6           A.     We try to at quarterly meetings.

7           **Q.     Right. And I take it they don't always**  
8           **answer that question, fair to say?**

9           A.     They will always respond, but they will  
10          say, "Sorry. We don't have anything to share."

11          **Q.     Okay. And do you know why they are**  
12          **reluctant to tell you whether they took things down**  
13          **or not?**

14                 MR. SUR:  Objection; vague, calls for  
15          speculation, mischaracterizes the record.

16                 THE WITNESS:  I don't know why -- I focus  
17          on when they do let us know about actions that  
18          they've taken.

19          **Q.     BY MR. SAUER:  When you say you focus on**  
20          **that, what do you do with that information?**

21          A.     I document it, and then I relay it back to  
22          the field office, where it gets logged where that  
23          information came from.

24          **Q.     Do essentially all these communications**  
25          **kind of pass through you because you are the**



1 relevant field officer in San Francisco, where  
2 these companies are located?

3 A. I would say I'm one of the primary people  
4 with pass-through information. However, we have  
5 agents on the different cyber squads and our  
6 private sector-engagement squad who also relay  
7 information to the companies.

8 Q. Who are those agents who relay this kind  
9 of information about a sort of problematic content  
10 on their platforms to social media?

11 (Discussion off the record.)

12 (Reporter read back as requested.)

13 THE WITNESS: So the question is: Who are  
14 these agents who do that? I would say for that  
15 sort of information it is not specifically about,  
16 quote, problematic content. It is specifically  
17 about cyber investigations, which are different  
18 from malign-influence investigations.

19 Q. BY MR. SAUER: Let me rephrase the  
20 question. Focusing on disinformation and  
21 malign-foreign-influence operations, are there any  
22 other FBI officials besides yourself who are  
23 involved in communicating those kinds of concerns  
24 to social media platforms outside the context of  
25 the quarterly meetings you've talked about?

1           A.     Yes.  I have squad supervisors who are  
2     GS-14-level employees who share information to the  
3     companies as well.

4           MR. SUR:  I'm sorry to interrupt.  The  
5     videographer is suggesting that we go off the  
6     record for technical reasons.

7           THE VIDEOGRAPHER:  We're off the record at  
8     11:40 a.m.

9                     (Whereupon a recess was taken.)

10          THE VIDEOGRAPHER:  Back on the record at  
11     11:43 a.m.

12          **Q.     BY MR. SAUER:  Mr. Chan, I think you were**  
13     **saying you have two GS-14 officials who also**  
14     **communicate with social media platforms about**  
15     **disinformation, correct?**

16          A.     That is correct.

17          **Q.     Are those people who report to you in the**  
18     **San Francisco office?**

19          A.     They report to me directly.

20          **Q.     Other than those individuals, are there**  
21     **any other FBI officials who, to your knowledge,**  
22     **communicate with social media platforms about**  
23     **disinformation?**

24          A.     Yes.  The agents on those two supervisors'  
25     squads.

1 Q. And -- I'm sorry. What are the two  
2 supervisors' squads? Are they located in San  
3 Francisco?

4 A. Yes, they are. They are located in the  
5 San Francisco field office.

6 Q. Are those agents that also report to you  
7 as the ASAC?

8 A. That is correct. They report to the  
9 supervisors, who report directly to me.

10 Q. And those supervisors are the GS-14s that  
11 you just talked about, right?

12 A. That is correct.

13 Q. How about outside the San Francisco field  
14 office, are you aware of -- well, just a second.  
15 How many agents are we talking about there in total  
16 who engage in these communications with social  
17 media platforms about disinformation from the San  
18 Francisco field office?

19 A. I would say the two supervisors that I  
20 already mentioned and four agents on one squad and  
21 another agent on another squad.

22 Q. What kinds of communications do they have?  
23 Do they just send the Teleporter links, or do they  
24 get on the phone and talk to social media  
25 platforms? What's the nature of their

1 **communication?**

2 A. So both of the things that you said. So  
3 they will give them a heads-up if they need to  
4 relay information through Teleporter; and both of  
5 those squads have active investigations where they  
6 share unclassified, strategic-level information  
7 with the companies.

8 **Q. So they would share both strategic and**  
9 **tactical information?**

10 A. That is correct.

11 **Q. And then would they be involved in**  
12 **following up to find out if their -- the tactical**  
13 **information was acted on?**

14 A. Yes, they would.

15 **Q. So and that might apply to you, the two**  
16 **GS-14s and the six field agents on the two squads**  
17 **you referred to?**

18 A. Yes, that is correct.

19 **Q. Okay. Then how about outside the San**  
20 **Francisco field office? Are you aware of any other**  
21 **agents who -- are you aware of any other FBI**  
22 **officials who communicate with social media**  
23 **platforms about disinformation?**

24 A. So I am only aware of the FBI officials or  
25 employees who we invite to provide briefings at the

1 quarterly meetings.

2 Q. Okay. So that includes people who -- at  
3 FITF in Washington, D.C.?

4 A. That's correct.

5 Q. Is Laura Dehmlow -- she's the head of  
6 FITF, right?

7 A. Currently she's the section chief and head  
8 of the FITF.

9 Q. And does she come to all of those  
10 meetings?

11 A. I would say in the 2020 election cycle she  
12 had not been promoted yet and she was the unit  
13 chief for the China unit, and I would say she  
14 attended most of those quarterly meetings.

15 Since she has been promoted to be the head  
16 of the FITF, she has not attended as frequently. I  
17 believe she's only attended one set of meetings  
18 this year.

19 Q. What level of people do attend? You know,  
20 what sorts of people attend those meetings?

21 A. So Laura Dehmlow would be the  
22 highest-ranking FBI official to attend. She is the  
23 SES level. I would be the second-highest-level  
24 attendee, as a GS-15. And then everyone else would  
25 be below my grade, ranging from GS-14s to perhaps

1 GS-10 agents.

2 **Q. How long do these meetings last typically?**

3 A. We like to keep a tight agenda, and so it  
4 will typically last one hour.

5 **Q. And about how many people would attend on  
6 the FBI side -- or do attend on the FBI side?**

7 A. I would say from the Foreign Influence  
8 Task Force, between three to ten. However,  
9 typically only one to two people from each of the  
10 three units speaks. And then we would usually have  
11 one field office comprised of two  
12 representatives -- between one to three field  
13 offices attend. So one to two representatives from  
14 each of those field offices.

15 **Q. So I can't do that math in my head, but it  
16 is north of ten frequently?**

17 A. Yeah. If you do the math, it could be as  
18 high as a dozen.

19 **Q. And then how many people typically attend  
20 on the social media platform side?**

21 A. I would say a similar amount. For the --  
22 I'm sorry. I would say for the three larger  
23 companies -- specifically Google/YouTube, Facebook  
24 and Twitter -- it would be equal numbers or higher  
25 numbers than the FBI.

1 Q. When you provide tactical information to  
2 the social media platforms -- in other words, lists  
3 of social media accounts, URLs and other things of  
4 that nature -- how do you verify that those  
5 actually are inauthentic accounts and not actual  
6 real accounts by real people?

7 MR. SUR: Objection; implicates the law  
8 enforcement privilege.

9 I will ask that the witness answer only in  
10 generalities without disclosing the details of any  
11 particular investigation.

12 THE WITNESS: Understood.

13 So there are -- the FBI, as the lead law  
14 enforcement agency and domestic security agency for  
15 the federal government has two types of  
16 authorities. One, which you're very familiar with,  
17 Title 18 criminal authorities and all that  
18 entails -- subpoenas, search warrants, 2703(d)  
19 orders -- is one way that we acquire information  
20 for investigations.

21 On the national security side, we have  
22 Title 50 authorities and then the authorities from  
23 the Foreign Intelligence Surveillance Act, from  
24 the -- from the PATRIOT Act, from Executive Order  
25 12333 that allows us to gather national security

1 intelligence.

2 And so broadly we are able to use both  
3 types of techniques to gather the intelligence that  
4 we need to -- and then there is a -- in the case of  
5 the national security side, there is a  
6 declassification process that has to take place  
7 before we are allowed to share information with the  
8 social media companies.

9 **Q. BY MR. SAUER: Let me ask you this: You**  
10 **had cited an example earlier where, for example, a**  
11 **Teleporter message was sent with a spreadsheet with**  
12 **hundreds of accounts back in 2020. Do you remember**  
13 **talking about that?**

14 A. Yes.

15 **Q. How sure are you that every single one of**  
16 **those accounts is actually an inauthentic kind of**  
17 **Russian-originated account as opposed to, you know,**  
18 **actually a real account of somebody who's got a**  
19 **Facebook or Twitter or YouTube account?**

20 MR. SUR: Objection; compound.

21 THE WITNESS: Within the U.S. intelligence  
22 committee, as you're familiar, there are different  
23 levels of confidence in terms of the information  
24 that, you know, we are reviewing in a product. And  
25 we only share information that we have high



1 confidence that is attributed to a foreign-state  
2 actor.

3 **Q. BY MR. SAUER: Is "high confidence" always**  
4 **correct or usually correct, in your experience?**

5 A. In my experience, it has always been  
6 correct.

7 **Q. So anything for the --**

8 A. For the selectors that we are providing.  
9 I do not remember an instance where we have  
10 provided selectors where any of the social media  
11 companies have said, "Elvis, this is actually  
12 U.S.-person information."

13 **Q. So you are not aware of ever getting**  
14 **feedback from them where they said you guys**  
15 **accidentally identified real users?**

16 A. That is correct.

17 **Q. Do they always tell you -- let me ask you**  
18 **this: How many of the ones that you flag do they**  
19 **take down?**

20 A. I couldn't even estimate that number.

21 **Q. How about as a percentage?**

22 A. I couldn't even estimate. And let me --  
23 let me tell you part of the reason is because we  
24 may share, for example, one account with them, but  
25 then they may find ten connected accounts and take

1 all of them down. And they don't always tell us  
2 when -- you know, how many accounts were taken  
3 down. Sometimes they will tell us. Sometimes they  
4 will tell us, "Thank you, Elvis. We were able to  
5 detect this information and took all of the  
6 accounts down." And when we ask for the specifics,  
7 they don't necessarily tell us all the time.

8 **Q. Right. Okay. But it sounds like**  
9 **sometimes your reports lead to more takedowns than**  
10 **the accounts you have -- you flagged, fair to say?**

11 A. That is correct.

12 **Q. How confident are you that they are not,**  
13 **you know, kind of making mistakes in taking down**  
14 **real user accounts?**

15 MR. SUR: Objection; calls for  
16 speculation, lacks foundation.

17 THE WITNESS: So this is just my personal  
18 opinion, obviously not based on being able to see  
19 any of their data. In my experience, they take  
20 account takedowns very seriously because this  
21 affects their bottom line.

22 So no social media company wants to take  
23 down a large number of accounts, because one of the  
24 things they base their ad sales on is how many  
25 users are on their platform. So in my opinion,

1 they take it very seriously. And I would say that  
2 to the best of their ability, they are very careful  
3 before doing account takedowns.

4 Q. BY MR. SAUER: I think that ties back into  
5 something you said earlier, which was in 2016 they  
6 really didn't do any account takedowns, fair to  
7 say?

8 A. That is correct.

9 Q. And it -- and I take it they may have had  
10 a -- I -- we may be speculating here, if you know.  
11 Do you know if that was because they have a  
12 financial incentive to leave those accounts up  
13 because it increases their ad revenues?

14 MR. SUR: Objection; calls for  
15 speculation.

16 THE WITNESS: I wouldn't even begin to  
17 speculate. I don't know why.

18 Q. BY MR. SAUER: Let me ask you this: Why  
19 did things change, in your view? I take it in 2018  
20 and 2020 there were many more account takedowns,  
21 right?

22 A. So there are two parts to your question.  
23 Why do I think they did it? I can provide you with  
24 my personal opinion.

25 Q. Okay.

1           A.    My -- I believe pressure from Congress,  
2           specifically HPSCI and SSCI, may have had a part of  
3           it.

4                    And then also because I believe that they  
5           felt that this may have damaged their brands, but  
6           that is my personal opinion.

7           **Q.    Okay.  Well, let me ask you this:  When**  
8           **you say "pressure from Congress" and you mentioned**  
9           **HPSCI and SSCI, what are HPSCI and SSCI?  Are**  
10          **those -- are those committees?**

11          A.    I'm sorry.  HPSCI is the -- the House  
12          Permanent Select Committee on Intelligence.  And  
13          SSCI is the Senate Select Committee on  
14          Intelligence.

15          **Q.    Starting with the House Permanent Select**  
16          **Committee on Intelligence, what kind of pressure**  
17          **did they put on the social media platforms to, you**  
18          **know, engage more aggressively in account**  
19          **takedowns?**

20          A.    They compelled -- I don't know if they  
21          compelled.  They requested the CEOs for the  
22          companies that I mentioned, the -- to testify in  
23          front of their committee.

24          **Q.    And so they kind of brought in Mark**  
25          **Zuckerberg and Jack Dorsey and Sundar Pichai and**

1 had them testify in front of Congress?

2 A. That is correct.

3 Q. And that happened -- that happened once or  
4 it happened multiple times?

5 A. To my knowledge, that happened more than  
6 once.

7 Q. And you believe that that -- that that  
8 kind of scrutiny and public pressure from Congress,  
9 in your view, motivated them to be more aggressive  
10 in the account takedowns?

11 MR. SUR: Objection; lacks foundation,  
12 calls for speculation.

13 THE WITNESS: That is just my personal  
14 opinion.

15 Q. BY MR. SAUER: Yeah. What is the basis  
16 for your opinion? Has anyone at a social media  
17 platform ever made a comment to you that would  
18 reflect that -- that view?

19 A. I would say yes. And the types of  
20 comments that I have received are that staffers  
21 from both of those committees have visited with  
22 those companies. And while they would not reveal  
23 the types of discussions that they had with these  
24 House and Senate staffers, they would indicate that  
25 they had to prepare very thoroughly for these types

1 of meetings and that it was -- they indicated that  
2 it felt like a lot of pressure.

3 **Q. "They" is representatives of social media**  
4 **platforms?**

5 A. Yeah. The social media companies that  
6 were visited.

7 **Q. What -- what social media companies were**  
8 **visited by these HPSCI and SSCI staffers?**

9 A. To my knowledge, it was the three  
10 companies that I've mentioned, which include  
11 Facebook, Google and Twitter.

12 **Q. And Facebook, Google and -- Facebook,**  
13 **Google and Twitter employees all told you that they**  
14 **experienced these visits from congressional**  
15 **staffers as exercising a lot of pressure on them?**

16 A. That was how I interpreted their comments.

17 **Q. And then you infer from that that their**  
18 **changes in takedown policies resulted from that**  
19 **kind of pressure from Congress?**

20 A. That is my personal opinion.

21 If I can add, I think some of -- some of  
22 what was discussed -- I'm interpreting what -- some  
23 of what was discussed. But what the -- the  
24 staffers would come and talk to us either before or  
25 after they met with those three companies. And so

1 what was discussed with us was legislation that  
2 they were thinking about doing, and them asking for  
3 our opinion.

4 **Q. Uh-huh. When you say "legislation that**  
5 **they were thinking about doing," what do you mean?**

6 A. Legislation that either HPSCI or SSCI was  
7 thinking about doing.

8 **Q. So HPSCI and SSCI, these committees on**  
9 **intelligence, their staffers would be communicating**  
10 **to the social media platforms Facebook, Twitter and**  
11 **Google or YouTube that they intended to try and**  
12 **pass legislation?**

13 A. So I inferred that because that is what  
14 they discussed with me personally.

15 **Q. That is what they, the social media**  
16 **platforms, discussed with you, correct?**

17 A. No, no. That is what HPSCI and SSCI  
18 discussed with me when they were coming to these  
19 meetings.

20 **Q. Oh, did you -- were you in on these**  
21 **meetings? Like, were you included in the meetings**  
22 **with the congressional staffers?**

23 A. So I and FBI San Francisco personnel would  
24 meet with the congressional staffers, typically  
25 before they met or after they met with the social

1 media companies. And the reason for that is  
2 because they wanted an FBI opinion about what they  
3 had heard from the social media companies.

4 **Q. I got you. What did they -- first of all,**  
5 **when did these meetings occur? Was this in 2017,**  
6 **2018, 2019, 2020? What time frame?**

7 A. I can't recollect, but I do -- they felt  
8 like an annual occurrence after -- after 2017.

9 **Q. And the congressional staffers would tell**  
10 **you in advance, "We're going to meet with the**  
11 **social media companies and -- and tell them about**  
12 **legislation we want to advance," correct?**

13 A. No.

14 **Q. I'm sorry.**

15 A. What they would say -- what they would say  
16 is they would tell us, "We plan to meet with these  
17 three companies, and what have you been doing with  
18 these three companies?"

19 And then we would share, like, the cases  
20 or -- that we would be working on, but we would be  
21 in a classified setting. So we would be able to  
22 speak more freely about the types of investigations  
23 that were the most prominent or the most active on  
24 our side, that they were either -- their -- their  
25 platforms were impacted at some point. That is --



1 would be the nature of our discussion with the  
2 staffers.

3 But I would not meet with the staffers and  
4 the social media companies. The staffers had  
5 separate meetings with each of the companies.

6 **Q. Okay. And then after those meetings, the**  
7 **staffers would come to you and ask your opinion**  
8 **about potential legislation?**

9 A. That is correct.

10 **Q. What sort of legislation?**

11 MR. SUR: I am going to object. The  
12 deliberative process privilege extends not just to  
13 the executive branch, but all sorts of executive  
14 communications within the government.

15 So if you can answer at a level of  
16 generality that avoids disclosing the  
17 particularities of any deliberations. If you -- if  
18 you cannot, then I instruct you not to answer.

19 THE WITNESS: I cannot discuss it in  
20 general terms.

21 **Q. BY MR. SAUER: Okay. Well, let me ask you**  
22 **this just generally. Did the legislation relate to**  
23 **Section 230 of the Communications Decency Act?**

24 MR. SUR: I am going to stand by the same  
25 objection on the grounds of deliberative process

1 privilege.

2 MR. SAUER: The deliberative process  
3 privilege does not apply, quote, when there is any  
4 reason to believe that government misconduct has  
5 occurred. The judge by ordering this deposition  
6 has already concluded there's potential First  
7 Amendment violations in this case that need to be  
8 explored, so the privilege does not apply.

9 MR. SUR: We are at the -- at the pleading  
10 stage on the First Amendment violations, and the  
11 judge has not ruled on any particular privilege  
12 question. So I will continue to assert and ask  
13 that the witness not answer the question on the  
14 grounds of the deliberative process privilege.

15 Q. BY MR. SAUER: Let me ask you this: The  
16 social media platforms talk to you -- people on the  
17 social media platforms talk to you as well, right?

18 A. Yes. I talk with the social media  
19 platform personnel regularly.

20 Q. And I think you'd said earlier that they  
21 had kind of just made statements to you that  
22 indicated that they felt that these meetings, these  
23 annual meetings with congressional staffers put a  
24 lot of pressure on them, right?

25 A. That was my interpretation of their

1 comments. I don't recollect any of them using the  
2 specific word "pressure," but that was how I  
3 interpreted our conversations.

4 **Q. What congressional staffers were involved**  
5 **in these meetings?**

6 A. They would be senior-level staffers. I'm  
7 sorry. I can't remember any of their names. But  
8 typically it would be -- the delegation would  
9 include a senior-level staffer, I think a  
10 director-level; and then one of their attorneys,  
11 like the committee counsel or a senior counsel for  
12 the committee; and then there would be one to two  
13 other, like, line-level staffers.

14 **Q. So there would be maybe three to five**  
15 **staffers total who would come to the meetings?**

16 A. That is correct.

17 **Q. Do you know who at the three social media**  
18 **platforms you referred to attended the meetings?**

19 A. So I was told by the staffers that they  
20 met with Facebook, Google and Twitter.

21 **Q. But then you actually talked to some**  
22 **people from Facebook, Google and Twitter who were**  
23 **at those meetings, right?**

24 A. Yes.

25 **Q. Who were they for Facebook, for starters?**

1           A.     For Facebook, I would typically talk to  
2     Steven Siegel.  He's a -- a director on their  
3     attorney side.

4           **Q.     Anyone else at Facebook that was involved**  
5     **in the meetings with congressional staffers?**

6           A.     He would be the one that I would talk to  
7     about that.

8           **Q.     And he -- for some --**

9           A.     That's what I recollect.

10          **Q.     And specifically he was involved in those**  
11     **meetings, right?**

12          A.     He led me to believe that he was involved  
13     in those meetings.  Probably not just him.

14          **Q.     How about -- how about Twitter, what -- do**  
15     **you know who at Twitter was involved in those**  
16     **meetings?**

17          A.     I would have discussions with Yoel Roth or  
18     Angela Sherrer.

19          **Q.     How do you spell "Angela Sherrer"?**

20          A.     Angela, common spelling; Sherrer,  
21     S-h-e-r-r-e-r.

22          **Q.     Anyone else?**

23          A.     She is no longer -- she's no longer -- or  
24     neither of them are at Twitter anymore.

25          **Q.     Okay.  There's some turnover there?**

1 A. Yes.

2 **Q. Anyone else at Twitter?**

3 A. Those would be the two senior officials  
4 that I am aware of.

5 **Q. How about Google?**

6 A. I would say in my experience it would be  
7 Richard Salgado.

8 **Q. Anyone else besides Richard Salgado?**

9 A. I believe on some occasions Shane Huntley  
10 would attend.

11 **Q. Anyone else at Google?**

12 A. I can't recollect at this time, but those  
13 would be the two most senior officials attending  
14 those types of meetings.

15 **Q. Let me ask you this: Connecting these two**  
16 **things, did you observe that after those meetings**  
17 **where the congressional staffers came out and met**  
18 **with Facebook, Twitter and YouTube; that Facebook,**  
19 **Twitter and YouTube changed their practices and**  
20 **became more active in account takedowns?**

21 A. No. I would not connect those two events.  
22 What I would say is after 2016 -- at the end of  
23 2016 and the beginning of 2017, after those initial  
24 congressional hearings, and even prior to those  
25 congressional hearings, in my experience, the

1 companies did not seem to be aware of the  
2 activities going on on other platforms. But after  
3 they became aware, they became much more active in  
4 trying to combat it.

5 Q. I am going to pull up your thesis again,  
6 and hopefully it won't cause audio problems. Can  
7 you see that?

8 A. Can you let us know what page you're on?

9 Q. Yeah. This is on Page 42. See down  
10 there, that's Page 42? And then that would be Page  
11 66 of the PDF.

12 A. Okay. I can see one whole paragraph and  
13 parts of two paragraphs.

14 Q. Can you see here at the top of the page  
15 where you refer to the "Internet Research Agency's  
16 influence campaign in 2016"?

17 A. Yes.

18 Q. And then you say that the "companies  
19 allowed the IRA free rein to achieve the relevant  
20 elements of the Kartapolov Framework" in 2016,  
21 right?

22 A. Yeah. That is how I characterize that.

23 Q. And that's a reference to, you know, "free  
24 rein," that is engaging in no takedown activity at  
25 all, but letting the Russian inauthentic content be

1 freely disseminated on their platforms, right?

2 A. That is correct.

3 Q. And then you go on to say, "However, later  
4 on, intense pressure from U.S. lawmakers and the  
5 media would eventually force the social media  
6 companies to examine what had taken place on their  
7 platforms and strive to ensure it did not happen in  
8 the future," right?

9 A. Yeah. I wrote that. And you can see that  
10 the footnote says I am referencing the HPSCI  
11 "Report on Russian Active Measures."

12 Q. So you're actually referencing HPSCI, the  
13 congressional committee that sent these staffers  
14 out to have these meetings that we just talked  
15 about, right?

16 A. That's correct.

17 Q. Do you still agree with that statement  
18 that (as read) "intense pressure from U.S.  
19 lawmakers and the media forced the social media  
20 companies to examine what had taken place and  
21 strive to ensure it did not happen in the future"?

22 A. Yes. I wrote that statement, and I agree  
23 with it.

24 Q. That's a consistent approach with the  
25 Footnote 185 that cites the congressional reports

1 as well as what you said earlier about, you know,  
2 calling the tech CEOs in to testify in front of  
3 Congress and these meetings out here in San  
4 Francisco, right?

5 A. Yes. That is my personal opinion.

6 Q. Okay. I want to jump ahead to Page 46 of  
7 your thesis. Can you still hear me?

8 A. Yes.

9 Q. Okay. Do you see here on Page 46, Page 70  
10 of the PDF?

11 A. "Facebook stated it took a series of  
12 measures"?

13 Q. All right.

14 (Discussion off the record.)

15 THE WITNESS: I read the first sentence of  
16 the second paragraph.

17 Q. BY MR. SAUER: Right. If I could direct  
18 your -- can you hear me now?

19 A. Yes.

20 Q. Directing your attention higher up, at the  
21 very top of the page, you say, "Facebook and  
22 Twitter appeared to be the most detailed in sharing  
23 their changes and the most public about account  
24 takedowns," right?

25 A. That is correct.



1 Q. And "their changes," what are those? Is  
2 that a reference to substantive actions and policy  
3 changes to address malign foreign influence?

4 A. Yes.

5 Q. And your footnotes there I think refers to  
6 changes that they actually made to their  
7 content-modulation policies, right, their terms of  
8 service?

9 A. That is correct. Whenever --

10 (Discussion off the record.)

11 THE WITNESS: Okay. Can you -- can you  
12 scroll back to the sentence you were on, Mr. Sauer?

13 Oh, I wanted to clarify that the  
14 substantive actions refers to, like, the  
15 technology-detection methods, right? That is one  
16 of the substantive actions.

17 And then, as you mentioned, yeah, the  
18 policy changes specifically to their terms of  
19 service or community standards.

20 (Discussion off the record.)

21 THE WITNESS: -- and community -- or  
22 community standards.

23 Q. BY MR. SAUER: Got you. So the policy  
24 changes are changes -- the substantive changes are  
25 their using algorithms to detect inauthentic

1 **content, right?**

2 A. Correct. That is -- that is what I'm  
3 referring to.

4 Q. And then these -- the policy changes are  
5 actually changing their terms of service to make  
6 things -- to clarify that certain things actually  
7 violate their policies and can be taken down,  
8 right?

9 A. Correct.

10 Q. So those are kind of more robust or more  
11 aggressive content-modulation policies that they  
12 have adopted in this time frame, right?

13 A. Yes.

14 Q. And you go on to say in the next page,  
15 "Facebook and Twitter appeared to be the most  
16 detailed in sharing their changes and the most  
17 public about account takedowns," right?

18 A. That is correct.

19 Q. And the changes they shared were they  
20 shared that they had both -- well, include the  
21 policy changes, the changes to their terms of  
22 service, right?

23 A. Yes. They were very public in blog posts  
24 about the terms-of-service changes --

25 (Discussion off the record.)

1 THE WITNESS: -- is their term for it --  
2 (Discussion off the record.)

3 THE WITNESS: And providing reports of  
4 account takedowns of foreign malign influence.

5 Q. BY MR. SAUER: So in addition to notifying  
6 the FBI that they had taken stuff down, they would  
7 provide a public report saying, "Hey, we took down  
8 all the -- a certain number of accounts in the last  
9 quarter"; is that what they would do?

10 A. Yes, yes.

11 Q. Okay. And you go on to say, "A possible  
12 reason could be that Facebook and Twitter faced  
13 more Congressional scrutiny than Google as their  
14 senior executives testified before Congress on  
15 three separate occasions before the midterm  
16 elections" --

17 A. Uh-huh.

18 Q. -- is that right?

19 A. Yes. I do cite a news article. I --  
20 however, I do share the opinion of that article.

21 Q. And that's consistent with what we just  
22 talked about a moment ago, which is that one way  
23 that these social media platforms experience  
24 pressure was Mark Zuckerberg and Jack Dorsey had to  
25 go testify in front of Congress multiple times.

1     **And you infer from that that may have led to their**  
2     **changing their terms of service to be more robust**  
3     **and to prevent certain kinds of content from being**  
4     **posted; fair to say?**

5             MR. SUR:  Objection; mischaracterizes the  
6     record.

7             THE WITNESS:  My personal opinion is that,  
8     yeah, the -- my personal opinion is that political  
9     pressure from Congress was a contributing factor.

10            **Q.  BY MR. SAUER:  On the next page, Page 47,**  
11     **you talk about there were a significant number of**  
12     **takedowns, right?  "In 2018, Twitter announced the**  
13     **takedown of 3,613 IRA-associated accounts."**

14            A.  Yeah.  I see that at the bottom of the  
15     first paragraph on that page.

16            **Q.  Do you have any way of knowing if all of**  
17     **those were actually IRA-associated or some of them**  
18     **might have been authentic accounts?**

19            A.  Well, I only know what Twitter has told  
20     us.

21            **Q.  Jumping ahead in your thesis to -- a**  
22     **couple pages, to Page 49, you talk about how**  
23     **something "provided politicians with the occasion**  
24     **to exert pressure on the companies to make**  
25     **constructive changes to their platforms," right?**

1 A. Yeah, that was my assessment.

2 Q. Yeah. And in other words, this is, again,  
3 another way of saying something we have been  
4 talking about, that politicians, including members  
5 of Congress, pressured the social media companies  
6 to make changes to their platforms to address  
7 malign foreign influence, correct?

8 A. That is correct.

9 Q. And you described it as "constructive  
10 changes." So by and large you approve of the  
11 policy changes and substantive actions that were  
12 taken after 2016, correct?

13 MR. SUR: Objection; lacks foundation.

14 THE WITNESS: The reason I said it was  
15 constructive was that it appeared the social media  
16 companies were able to detect and counter  
17 foreign-malign-influence operations on their  
18 platforms, which I believe was constructive.

19 Q. BY MR. SAUER: And do you think it's  
20 constructive that they are better equipped to  
21 engage in account takedowns?

22 A. That is correct. As compared to 2016 and  
23 prior.

24 Q. And you think it is a positive development  
25 between 2016 and 2018 that zero accounts were taken

1 down during the 2016 cycle but 3,613 Twitter  
2 accounts were taken down in the 2018 cycle,  
3 correct?

4 A. Yeah. The higher number is better than  
5 zero, in my estimation.

6 Q. Because by and large you believe that  
7 malign-foreign-influence accounts should be taken  
8 down from Twitter, Facebook, YouTube and so forth?

9 A. Yes, that is my belief.

10 Q. In the next paragraph of the thesis, you  
11 talk about the Global Engagement Center. What  
12 exactly is that?

13 A. So as I mentioned, it -- legislation  
14 established the Global Engagement Center within the  
15 State Department. And based on my understanding  
16 and review of reporting about the GEC, they were  
17 primarily focused originally on countering foreign  
18 terrorist organizations' propaganda.

19 Q. Do you -- and then did their mission  
20 change to address malign foreign influence?

21 A. I -- yeah. I would say it has now -- in  
22 my experience, it is now including malign foreign  
23 influence as well.

24 Q. When you say your experience, do you  
25 interact with the Global Engagement Center in your

1 **professional role?**

2 A. Yeah, I -- the -- yes. Ahead of the 2020  
3 elections, I engaged with a regional representative  
4 who was based here in San Francisco.

5 **Q. Who was that?**

6 A. His name was Sam Stewart.

7 **Q. Uh-huh. Was that Samaradun Kay Stewart?**

8 A. Yeah. Yeah, that's his full name.

9 **Q. What were your interactions with him?**

10 A. I would have periodic phone calls with  
11 him. He would meet with the social media companies  
12 separately from me. And from what he told me, it  
13 seemed like he primarily met with policy  
14 individuals. I -- I rarely, if ever, meet with  
15 policy individuals.

16 As I mentioned to you before, I typically  
17 meet with the trust and safety individuals and then  
18 their associated attorneys.

19 **Q. Did he discuss with you the nature of the**  
20 **meetings he had with the policy individuals at**  
21 **social media platforms?**

22 A. I would say only broadly. He discussed  
23 different initiatives that they have.

24 **Q. Would the social media platforms --**

25 A. And these initiatives include different

1 types of software made by vendors that they would  
2 pilot to see if they could detect malign foreign  
3 influence on social media platforms. And then he  
4 would also share information from State Department  
5 employees who were at embassies, you know, boots on  
6 the ground type of information from the embassies  
7 we have around the world.

8 That is the type of information that he  
9 would share with me and let me know that that was  
10 the type of information that he was sharing with  
11 the companies.

12 **Q. That first piece of it is kind of**  
13 **interesting because it sounds like that connects to**  
14 **what you said earlier about the substantive actions**  
15 **taken by the social media platforms. They adopted**  
16 **computer programs or algorithms to try and detect**  
17 **inauthentic foreign activity, correct?**

18 A. Yes. In my estimation, they use that type  
19 of technology to detect and either knock down or  
20 flag malign-foreign-influence activity.

21 **Q. It sounds like Mr. Stewart was, based on**  
22 **your description, kind of offering them access to**  
23 **the sorts of tools they might be able to use to**  
24 **detect it, correct?**

25 MR. SUR: Objection; calls for



1 speculation, mischaracterizes the record.

2 THE WITNESS: So I don't know what outside  
3 vendors any of the companies, any of the social  
4 media companies use.

5 I do know that the -- Sam Stewart from the  
6 Global Engagement Center, he -- he would provide  
7 webinars to me from these different types of  
8 vendors, and then the vendors would just come in  
9 and share results that they have.

10 Q. BY MR. SAUER: When you say "results," are  
11 these vendors who prepare computer programs to  
12 detect, you know, inauthentic activity on social  
13 media platforms?

14 A. That is my understanding.

15 Q. And you -- I take it you participated in  
16 some of his presentations, or you --

17 A. I would say I went to two of those  
18 webinars just to see what they were like.

19 However, based on my viewing of those two  
20 webinars, I did not think it was useful from a law  
21 enforcement standpoint.

22 Q. And would it be more useful -- in other  
23 words, a more useful audience would have been the  
24 social media platforms who might use such programs?

25 MR. SUR: Objection; vague.

1 THE WITNESS: I believe that is why Sam  
2 Stewart would share that type of information. But  
3 the reason I did not find it useful was because, as  
4 a law enforcement agency and a domestic security  
5 service, I am focused on the malign foreign actors  
6 themselves and their activities. And what these  
7 companies and applications did was just look at  
8 the -- look at the content and activities from a  
9 surface level.

10 So I would be concerned that that sort of  
11 application might accidentally pick up U.S. people  
12 information, and so that is not something that I  
13 think would be useful or relevant to the FBI.

14 Q. BY MR. SAUER: And so your concern -- your  
15 concern was that the GEC's kind of computer  
16 programs that they were making available to social  
17 media companies might be overinclusive and  
18 misidentify authentic accounts as inauthentic  
19 activity?

20 MR. SUR: Objection; lacks foundation,  
21 calls for speculation, and mischaracterizes the  
22 record.

23 THE WITNESS: So if I may -- if I may  
24 respond to your question. So the State Department  
25 is primarily a foreign-focus agency. And so in

1 their estimation -- I believe that in their  
2 estimation their tools would be deployed overseas,  
3 where I believe they do not have the same type of  
4 legal training that I do specifically about First  
5 Amendment protections. And so, you know, they are  
6 overseas in embassies and their analysts are  
7 overseas in embassies, and so they don't have the  
8 same sorts of concerns that I would working at the  
9 FBI is what I -- is my personal opinion.

10 **Q. BY MR. SAUER: Okay. And those concerns**  
11 **specifically is that it would raise a First**  
12 **Amendment concern if somebody's -- a real user's**  
13 **account got accidentally taken down because the**  
14 **State Department provided a computer program that**  
15 **was overinclusive?**

16 MR. SUR: Objection; mischaracterizes the  
17 record and calls for a legal conclusion.

18 **Q. BY MR. SAUER: But if -- yeah, if that**  
19 **concern --**

20 A. So I don't think the State Department was  
21 providing these programs to the companies. I think  
22 the State Department was just providing a venue  
23 where different vendors could show off their  
24 products. I don't think they endorsed or did not  
25 endorse these products, but they provided -- and it

1 wasn't just for the social media companies.

2           They would invite all sorts of audiences,  
3 to include researchers, employees from State  
4 Department counterparts, so typically Ministry of  
5 Foreign Affairs. They would provide -- these were  
6 open to the general public, but I believe the  
7 audience that they were going for were State  
8 Department-equivalent personnel, social media  
9 companies and researchers.

10           MR. SAUER: Do you want to go off the  
11 record?

12           THE WITNESS: That's just based on what --

13           THE VIDEOGRAPHER: Off the record at  
14 12:27.

15                           (Whereupon the noon recess was  
16 taken.)

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1 REMOTE VIA ZOOM, CALIFORNIA, NOVEMBER 29, 2022

2 AFTERNOON SESSION

3 ---o0o---

4 THE VIDEOGRAPHER: We are back on the  
5 record at 1:20 p.m.

6 Q. BY MR. SAUER: Agent Chan, I just want to  
7 direct your attention back to your thesis, Exhibit  
8 1, for a few more questions. Let me know if you  
9 have difficulty hearing me.

10 Here I am on Page 61 of your thesis, which  
11 is Page 85 of the pdf. In here you discuss the  
12 case of PeaceData, which was a website, right?

13 A. Yes, that is correct.

14 Q. What exactly was PeaceData? Was that a  
15 Russian-originated website?

16 A. Yes. For the 2020 election cycle, that  
17 was a website created by the Internet Research  
18 Agency.

19 Q. And it was intended to sow kind of  
20 disinformation and discord among kind of  
21 left-leaning voters in the United States, right?

22 A. Yes.

23 Q. And then here in this sentence that I am  
24 highlighting you say "Third, Reuters broke a story  
25 about the IRA posing as PeaceData staff to hire

1     **unwitting freelance journalists, including**  
2     **Americans, to write articles for the site," right?**

3           A.     That is correct, and I cite the articles.

4           **Q.     Right. And then you go on to say that**  
5     **"The Carnegie Endowment" "determined that at least**  
6     **20 freelance journalists," which includes**  
7     **Americans, "had been duped into writing articles**  
8     **for the PeaceData outlet," right?**

9           A.     That is correct.

10          **Q.     Those articles were posted on that**  
11     **website, right?**

12          A.     That is correct.

13          **Q.     Then that website, I take it, got taken**  
14     **down as a result of the revelation that it was a**  
15     **Russian mis- -- or Russian-originated site, right?**

16          A.     I do not believe it was taken down. I  
17     believe it was just discredited. It may -- I  
18     haven't checked it, but it was up for a while.

19          **Q.     And this is one of those sites that you**  
20     **described as achieving fairly low engagement**  
21     **earlier in the deposition; is that right?**

22          A.     Right. That is correct.

23          **Q.     Was the FBI involved in the investigation**  
24     **of the PeaceData?**

25                 MR. SUR:   Objection; vague.

1 THE WITNESS: So the FBI shared  
2 information with the companies that it believed the  
3 Internet Research Agency was standing up. Two  
4 websites. One was PeaceData, and the other was  
5 called NAEBBC, which is an abbreviation for Newsroom  
6 for American- and European-Based Citizens. So they  
7 were supposed to be complementary news websites.  
8 But we did tip the social media companies to both  
9 of those sites.

10 Q. BY MR. SAUER: Did the social media  
11 companies, to your knowledge, act on that  
12 information and take actions to restrict social  
13 media postings about those -- bombing those sites?

14 A. What they conveyed to me is that they  
15 identified accounts that were foreign-associated,  
16 so Internet Research Agency-associated, that were  
17 directing users on those platforms to the PeaceData  
18 website as well as the NAEBBC website.

19 Q. So they identified. Did they take actions  
20 against those accounts?

21 A. I believe they did.

22 Q. Okay. So this is a situation where the --  
23 in the 2020 election cycle the tactics have evolved  
24 and the Russians have now created a website, hired  
25 Americans to write for the website and post

1 articles on it, and then are using fake accounts to  
2 direct ordinary users to the content on that  
3 website; is that right?

4 MR. SUR: Objection; assumes facts not in  
5 evidence.

6 THE WITNESS: Yeah, so you have summarized  
7 one of the shifts that I noticed in my thesis.

8 Q. BY MR. SAUER: Got you. And the FBI was  
9 the organization that flagged this for social media  
10 companies as -- the PeaceData site as a  
11 Russian-originating site, correct?

12 A. Yes, that is my recollection.

13 Q. Okay. So in that you talked about the  
14 NAEBC site, right? That's N-A-E-B-C, right?

15 A. Correct.

16 Q. And that was a more right-wing site that  
17 the Russians originated?

18 A. Correct.

19 Q. And just turning two pages ahead in your  
20 thesis to Page 63, you have a sentence here about  
21 the NAEBC site that begins "Lastly, Graphika  
22 determined that the IRA used various social media  
23 accounts to engage with real users and convince  
24 them to post on the NAEBC site, which met with some  
25 success," correct?



1           A.    Yes, I wrote that, and I was citing the  
2    Graphika team report.

3           **Q.    So it's your understanding that the NAEBC**  
4    **site also included content drafted and written by**  
5    **real users that had posted on that site?**

6           A.    Yes, based on the Graphika report.

7           **Q.    So it is a bit like the PeaceData site**  
8    **where they had hired freelance journalists,**  
9    **including Americans, to post on the site. Here**  
10   **they induced social media users to post their own**  
11   **thoughts on that site, right?**

12          A.    That is correct, but we do not know the  
13    nationality of the users because it wasn't  
14    mentioned in the source that I used.

15          **Q.    You don't know today whether those were**  
16    **Americans or foreigners who were posting on that**  
17    **NAEBC site, right?**

18          A.    I do not.

19          **Q.    But the NAEBC site was designed by the**  
20    **Russians for Americans to read, right, or Americans**  
21    **and Europeans; is that right?**

22          A.    That is my assessment.

23          **Q.    In fact, NAEBC stands for Newsroom for**  
24    **American- and European-Based Citizens, right?**

25          A.    That is correct.

1 Q. Higher on this page you describe these  
2 people who posted on the site as unwitting  
3 co-optees. Do you see that?

4 A. I do see that.

5 Q. So you have a situation where there's a  
6 kind of, you know, intermingling or blending of the  
7 inauthentic Russian content with essentially  
8 authentic user-generated content, right?

9 MR. SUR: Objection; vague and ambiguous.

10 THE WITNESS: Yes, I characterize those  
11 individuals as unwitting co-optees.

12 Q. BY MR. SAUER: And the FBI flagged the  
13 NAEBC site for social media platforms as a kind of  
14 Russian-originated source as well, right?

15 A. That is correct.

16 Q. Did you also flag social media accounts  
17 that were engaged in directing people -- or  
18 directing people to those sites, both PeaceData and  
19 NAEBC, to the social media platforms?

20 MR. SUR: Objection; vague and ambiguous.

21 THE WITNESS: No, not to my recollection.  
22 From my recollection, we provided those two  
23 websites to include the URLs and then the companies  
24 were able to discover Russian-controlled accounts  
25 that were used to try to redirect users to those

1 websites.

2 Q. BY MR. SAUER: And the social media  
3 companies told you that they had found them. Did  
4 they say they had taken action against those  
5 accounts?

6 A. Yes, they said that they had taken down  
7 those accounts.

8 Q. Jumping ahead to Page 70 of your thesis,  
9 which is Page 94 of the PDF, Table 5 here you have  
10 a summary of Facebook takedowns from 2020, right?

11 A. Yes.

12 Q. And you have a grand total of 825 accounts  
13 taken down from Facebook and Instagram pages -- or  
14 platforms, right?

15 A. That is correct.

16 Q. So I think part of your thesis points out  
17 that Facebook was much, much more active in the  
18 2020 election cycle in removing  
19 malign-foreign-influence accounts than it had been  
20 in 2016, right?

21 A. That is my assessment.

22 Q. And in your thesis, you only cite the four  
23 publicly cited in media reports instances where the  
24 FBI had flagged stuff to Facebook and other social  
25 media platforms, right?

1           A.     That is correct. Because that was -- I  
2 was writing the thesis for me personally, and I was  
3 not representing -- you know, if you look at the  
4 caveat in the first place, I was representing my  
5 personal views and not necessarily the views of the  
6 FBI regarding the thesis.

7           **Q.     But in your capacity as an FBI agent,**  
8 **you're aware of a lot more than four instances**  
9 **where the FBI had flagged accounts, right?**

10          A.     You are correct.

11          **Q.     In fact, I think you said it was one to**  
12 **five instances per month in 2018 election cycle --**  
13 **sorry, one to five instances per month during the**  
14 **2020 cycle and one to four instances per month in**  
15 **the 2022 cycle, correct?**

16          A.     That is correct. And the reason for that  
17 is because that information is not publicly  
18 available. So I could not use it in my thesis.

19          **Q.     Understood. And of those 825 accounts**  
20 **from Facebook, do you have any idea, ballpark, how**  
21 **many of those were the results of takedowns --**  
22 **sorry. How many of those takedowns were the result**  
23 **of information provided by the FBI?**

24          A.     Unfortunately I do not. I would love to  
25 have that statistic, but I do not have that.

1 Q. You kind of asked them for that and they  
2 haven't told you, right?

3 A. That is correct.

4 Q. Okay. But it's some subset of those  
5 because you have been told on multiple occasions  
6 that they have acted on information that you  
7 provided, right?

8 A. That is my assumption.

9 Q. Next page you talk about in 2019, Twitter  
10 announced two takedowns of 422 accounts which made  
11 929,000 tweets, right?

12 A. That's correct.

13 Q. Can you look at the figure on that page?  
14 Looks like the topics relate to the 2018 midterms,  
15 MAGA, ReleaseTheMemo and other subjects; is that  
16 right?

17 A. That is correct.

18 Q. ReleaseTheMemo is some -- some sort --  
19 some trend that's designed to appear -- to appeal  
20 to conservative voters, right?

21 A. Honestly, I can't remember.

22 Q. In any event, do you know how many of  
23 these 422 accounts and 929,000 tweets that were  
24 removed were the result of FBI information?

25 A. I do not.

1 Q. It is some subset of those, but they  
2 haven't given you the precise numbers; is that fair  
3 to say?

4 A. That is -- that would be my assumption.

5 Q. And then the next page, again, there's a  
6 reference to Twitter announcing four sets of  
7 takedowns with 1,233 accounts as well. Same  
8 question: I take it that some of those are due to  
9 the FBI, but you don't know how many?

10 MR. SUR: Objection; calls for  
11 speculation.

12 THE WITNESS: I would assume that some  
13 subset of that amount was due to information we  
14 provided, but I do not know the exact number.

15 Q. BY MR. SAUER: And at some level you know  
16 that some are because Twitter's told you on at  
17 least some occasions, "Yes, we acted on your  
18 information and took down problematic accounts,"  
19 right?

20 A. That is correct.

21 Q. Let's jump ahead to Page 76 of your  
22 thesis. You have a discussion of some meetings  
23 here at the bottom of the page. You see where I  
24 am? On September -- you talk about how the U.S.  
25 government was more engaged ahead of the 2020

1 **elections, right?**

2 A. I said the government appeared to be more  
3 engaged with social media companies.

4 **Q. In fact, based on your actual experience,**  
5 **were you more engaged?**

6 A. I would personally characterize it as  
7 being more engaged. However, I cannot discuss that  
8 in a thesis.

9 **Q. Got you. This next sentence you say**  
10 **"September 4th, 2019, Facebook hosted an election**  
11 **security meeting with FBI, DHS and ODNI," right?**

12 A. That's correct.

13 **Q. Were you at that meeting?**

14 A. I was at that meeting.

15 **Q. Who else was at that meeting from the FBI?**

16 A. I specifically remember two attorneys  
17 being at that meeting, but they are both GS-14  
18 attorneys.

19 **Q. Don't tell me their names. Anyone else**  
20 **from the FBI?**

21 A. No. I believe I -- yeah, I was the only  
22 non-FBI -- I'm trying to remember if any FITF  
23 employees came. Actually, yes, I believe one  
24 employee from FITF came, but I am not completely  
25 sure.

1 Q. Do you know who it was?

2 A. Yeah, he's another GS-15. It would be the  
3 unit chief for the Russian unit.

4 Q. How about from DHS, were those CISA  
5 individuals?

6 A. I definitely remember Matt Masterson being  
7 there, but I do not remember if Brian Scully was  
8 there. Oh, I also remember the director of CISA,  
9 Mr. Krebs, was there as well.

10 Q. So Krebs, Masterson and possibly Scully  
11 were at that meeting?

12 A. Krebs and Masterson for sure, and I can't  
13 remember if Scully was there.

14 Q. Okay. What was discussed at this meeting?

15 A. It was just an overall meeting to discuss  
16 election security, and I think in my opinion,  
17 Facebook held the meeting because they wanted all  
18 of the relevant federal government components in  
19 the same room to share what the federal government  
20 agencies intended to do to ensure the safety of the  
21 2020 elections.

22 Q. Okay. And you go on to the next page to  
23 say, "The other companies attending the meeting  
24 included Google, Microsoft, and Twitter," right?

25 A. Yeah. And you can see from the footnote



1 those were the only companies who were mentioned in  
2 the article.

3 Q. Were there other companies there, since  
4 you attended the meeting?

5 A. Yes, there were other companies there.

6 Q. Which ones?

7 A. I specifically remember Yahoo! was there.

8 Q. Any others?

9 A. Not from my recollection.

10 Q. Were the individuals from the social media  
11 platforms at these -- at this meeting, were these  
12 people from the site integrity or trust and safety  
13 teams?

14 A. Yes.

15 Q. So those are the people on the social  
16 media side who have responsibility for enforcing  
17 content-modulation decisions and enforcing terms of  
18 service?

19 A. That is --

20 MR. SUR: Objection; calls for  
21 speculation, lacks foundation.

22 THE WITNESS: That is my understanding.

23 Q. BY MR. SAUER: Did you -- what was -- was  
24 content modulation discussed at all? Was  
25 disinformation discussed at this meeting?

1 MR. SUR: Objection; vague and ambiguous.

2 THE WITNESS: From my recollection, the  
3 social media companies were focused on discussing  
4 disinformation, and the FBI was really focused on  
5 the actors who were involved, specifically the  
6 Internet Research Agency.

7 Q. BY MR. SAUER: So this was an information  
8 where disinformation was discussed and removing  
9 disinformation from platforms?

10 A. So the social media companies discussed  
11 that. We, the FBI, did not discuss that.

12 Q. What did CISA discuss at this meeting,  
13 Mr. Krebs and Mr. Masterson or Mr. Scully, if he  
14 was there?

15 A. From my recollection, CISA just discussed  
16 what their role was and is in securing election  
17 infrastructure and supporting election officials.

18 Q. Did they talk about disinformation?

19 A. I do not remember them talking about  
20 disinformation.

21 Q. How about ODNI, did they talk about  
22 removing disinformation?

23 A. No, they did not. ODNI, from my  
24 recollection, provided an unclassified overview of  
25 three specific nation states that they were

1 concerned might try to conduct malign-influence  
2 campaigns against the U.S. elections in 2020.  
3 These include Russia, China and Iran.

4 Q. You go on to say, "In August 2020, the New  
5 York Times broke a story revealing that the private  
6 sector companies working with the U.S. government  
7 had expanded to include the Wikimedia Foundation,  
8 Verizon Media, Reddit, Pinterest, and LinkedIn,"  
9 correct?

10 A. That is correct.

11 Q. So let me ask you this: Were there other  
12 meetings, other than this one on September 4th,  
13 2019, with these other companies?

14 A. I don't remember another -- oh, outside of  
15 the CISA-hosted industry group meetings, I don't  
16 remember another meeting that had all of the  
17 companies together.

18 Q. Okay. So the CISA-hosted meetings, that's  
19 the -- I think we talked about at the very  
20 beginning of the deposition, the industry -- what  
21 does CISA call, the industry-what meeting?

22 A. I can't remember, but yes, those were the  
23 meetings I was -- those were the meetings I was  
24 referring to.

25 Q. So you believe this -- you believe this

1 New York Times story that refers to Wikimedia,  
2 Reddit and Pinterest and so forth is a reference to  
3 the CISA-hosted industry meeting that you just  
4 testified about earlier, correct?

5 A. That is only my assumption.

6 Q. Okay. Those meetings you attended some  
7 but not all of them, I think you said?

8 A. Yes, that is correct.

9 Q. Was disinformation discussed at those  
10 meetings, the CISA-led industry meetings that  
11 included all these social media platforms?

12 A. Yes, from -- the disinformation content  
13 was shared by the social media companies. They  
14 would provide a strategic overview of the type of  
15 disinformation they were seeing on their respective  
16 platforms.

17 Q. And then what did the government say in  
18 those meetings?

19 MR. SUR: Objection; vague and ambiguous.

20 THE WITNESS: As I mentioned before, CISA  
21 primarily discussed actual election logistics to  
22 include the dates of State primaries, the methods  
23 for which ballots were cast.

24 The FBI, we just provided strategic,  
25 unclassified overviews of the activities that we

1 saw the Internet Research Agency doing.

2 ODNI, to my recollection, did not provide  
3 any substantive overviews at most of the meetings  
4 except for to provide general assessments about  
5 nation-state-level threats.

6 Q. BY MR. SAUER: I am going to jump ahead to  
7 Page 94 of your thesis, and that's on Page 118 of  
8 the PDF.

9 A. So where --

10 Q. Up here at the top.

11 A. Part B, "Recommendations."

12 Q. Right above it.

13 A. Okay.

14 Q. At the top you say, "Many factors are at  
15 play when trying to measure the effects of Russia's  
16 influence operations," right?

17 A. Yes.

18 Q. You say, "First-order effects include real  
19 users interacting with inauthentic content," right?

20 A. Yes.

21 Q. Interacting with inauthentic content, that  
22 includes reading it, liking it, commenting on it,  
23 potentially reposting it and reposting it with a  
24 commentary, correct?

25 A. Yes.

1 Q. Those are all first-order effects of  
2 Russia's influence operations, right?

3 A. That is how I define "first-order  
4 effects."

5 Q. Got you. "Russian-bot amplification of  
6 diverse organic content is what you list in that  
7 list, right?"

8 A. Yeah, I also define that as a "first-order  
9 effect."

10 Q. And that refers to the Russian bots  
11 basically being used to amplify, that is like or  
12 repost or retweet, content that other users have  
13 already posted, right?

14 A. That is correct.

15 Q. And then a third first-order effect you  
16 identify is "IRA-controlled accounts communicating  
17 directly with real users," right?

18 A. That's correct.

19 Q. They would be directing messages to those  
20 users, and those users would be responding to these  
21 inauthentic accounts, right?

22 A. Correct.

23 Q. Jumping ahead to Page 99, you make a  
24 recommendation here for "the U.S. government to  
25 establish a National Counter Information Operations

1 Center as an interagency fusion center and focal  
2 point for countering disinformation campaigns,"  
3 right?

4 A. That is a personal recommendation that I  
5 made. If you look at the footnote, this was one of  
6 the recommendations of the U.S. Cyberspace  
7 Solarium.

8 Q. Okay. So you kind of agree with what they  
9 had recommended, right?

10 A. That is my personal stance, not  
11 necessarily the stance of the FBI.

12 Q. You go on to say, "In April 2021" -- you  
13 talk about how that commission, the one whose  
14 recommendation you agree with, envisioned a center  
15 that would allow the relevant U.S. government  
16 elements to work alongside social media companies  
17 to combat disinformation, right?

18 A. That is correct. But I'm also citing a  
19 report.

20 Q. And combatting disinformation here would  
21 include the sort of stuff we're talking about  
22 already today, which is flagging inauthentic  
23 accounts and having them removed, right?

24 MR. SUR: Objection; vague and ambiguous,  
25 mischaracterizes the record.

1 THE WITNESS: Yeah. So my intent was --  
2 and what the commission also envisioned was closer  
3 to realtime sharing of information. So right now,  
4 you know, we are limited by the declassification  
5 process, the approval process for us to be able to  
6 get information in a form that can be shared with  
7 the social media companies.

8 However, if some of the social media  
9 company employees were to carry security  
10 clearances, they could be discussed at least on an  
11 informal basis at a high level, a higher  
12 classification.

13 Q. BY MR. SAUER: And I take it that  
14 communication could happen much more quickly under  
15 this recommendation, right?

16 A. Yes.

17 Q. And that could, therefore, result in  
18 quicker action being taken by the social media  
19 platforms against inauthentic activity on their  
20 platforms?

21 MR. SUR: Objection; calls for  
22 speculation.

23 THE WITNESS: Yes, that would be my  
24 opinion.

25 Q. BY MR. SAUER: And the next sentence you



1 say, "In April of 2021, the" ODNI announced "it was  
2 establishing 'the Foreign Malign Influence  
3 Center'." Do you know anything about that Foreign  
4 Malign Influence Center other than the public  
5 report that you cite?

6 A. Unfortunately I do not.

7 Q. So you don't know if they have something  
8 like you're recommending already in place where  
9 people with security clearances on the government  
10 side and the social media side can convey  
11 information to each other more quickly?

12 A. So I am not aware of any such sent -- of  
13 any such center being housed at ODNI at this point.

14 Q. Jump ahead -- or I'll jump ahead to Page  
15 104. Here toward the end you commented that  
16 "although the focus of this thesis was Russian  
17 disinformation campaigns, domestic disinformation  
18 operations also featured prominently ahead of the  
19 2020 elections," correct?

20 A. Can you tell me what you highlighted  
21 again?

22 Q. Oh, sorry. Here I am. "Although the  
23 focus of this thesis was Russian disinformation  
24 campaigns, domestic disinformation operations also  
25 featured prominently ahead of the 2020 elections."

1           A.     Yes, I wrote that, and I was citing a  
2     report from the Atlantic Council.

3           **Q.     Did you have any involvement in looking**  
4     **for domestic disinformation campaigns in the 2020**  
5     **election cycle?**

6           MR. SUR:   Objection; vague,  
7     mischaracterizes the record.

8           THE WITNESS:   In the context of the FITF  
9     meetings, no.

10          **Q.     BY MR. SAUER:   All right.   How about in**  
11     **any other context?**

12          A.     During FBI San Francisco's 2020 election  
13     command post, which I believe was held from the  
14     Friday before the election through election night,  
15     that Tuesday at midnight, information would be  
16     provided by other field offices and FBI  
17     headquarters about disinformation, specifically  
18     about the time, place or manner of elections in  
19     various states.

20                 These were passed to FBI San Francisco's  
21     command post, which I mentioned to you before I was  
22     the daytime shift commander, and we would relay  
23     this information to the social media platforms  
24     where these accounts were detected.

25                 So I do not believe we were able to

1 determine whether the accounts that were posting  
2 time, place or manner of election disinformation,  
3 whether they were American or foreign.

4 **Q. But you received reports, I take it, from**  
5 **all over the country about disinformation about**  
6 **time, place and manner of voting, right?**

7 A. That is -- we received them from multiple  
8 field offices, and I can't remember. But I  
9 remember many field offices, probably around ten to  
10 12 field offices, relayed this type of information  
11 to us.

12 And because DOJ had informed us that this  
13 type of information was criminal in nature, that it  
14 did not matter where the -- who was the source of  
15 the information, but that it was criminal in nature  
16 and that it should be flagged to the social media  
17 companies. And then the respective field offices  
18 were expected to follow up with a legal process to  
19 get additional information on the origin and nature  
20 of these communications.

21 **Q. So the Department of Justice advised you**  
22 **that it's criminal and there's no First Amendment**  
23 **right to post false information about time, place**  
24 **and manner of voting?**

25 MR. SUR: Objection on the grounds of

1 attorney-client privilege --

2 MR. SAUER: He just testified --

3 MR. SUR: -- and work product issues.

4 MR. SAUER: That's waived. He just told  
5 him what -- he just described what DOJ said, and  
6 I'm asking for specificity.

7 MR. SUR: I am putting the objection on  
8 the record.

9 **Q. BY MR. SAUER: You may answer.**

10 A. That was my understanding.

11 **Q. And did you, in fact, relay -- let me ask**  
12 **you this. You say manner of voting. Were some of**  
13 **these reports related to voting by mail, which was**  
14 **a hot topic back then?**

15 A. From my recollection, some of them did  
16 include voting by mail. Specifically what I can  
17 remember is erroneous information about when  
18 mail-in ballots could be postmarked because it is  
19 different in different jurisdictions.

20 So I would be relying on the local field  
21 office to know what were the election laws in their  
22 territory and to only flag information for us.

23 Actually, let me provide additional  
24 context. DOJ public integrity attorneys were at  
25 the FBI's election command post and headquarters.

1 So I believe that all of those were reviewed before  
2 they got sent to FBI San Francisco.

3 Q. So those reports would come to FBI San  
4 Francisco when you were the day commander at this  
5 command post, and then FBI San Francisco would  
6 relay them to the various social media platforms  
7 where the problematic posts had been made, right?

8 A. That is correct.

9 Q. And then the point there was to alert the  
10 social media platforms and see if they could be  
11 taken down, right?

12 A. It was to alert the social media companies  
13 to see if they violated their terms of service.

14 Q. And if they did, then they would be taken  
15 down?

16 A. If they did, they would follow their own  
17 policies, which may include taking down accounts.

18 Q. How about taking down posts as opposed to  
19 the entire account?

20 A. I think it depends on how they interpreted  
21 it and what the content was and what the account  
22 was.

23 Q. Do you know what the -- do you know  
24 whether some of those posts that you relayed to  
25 them were acted on by their content modulators?

1 MR. SUR: Objection; vague and ambiguous.

2 THE WITNESS: So from my recollection, we  
3 would receive some responses from the social media  
4 companies. I remember in some cases they would  
5 relay that they had taken down the posts. In other  
6 cases, they would say that this did not violate  
7 their terms of service.

8 Q. BY MR. SAUER: What sort of posts were  
9 flagged by you that they concluded did not violate  
10 their terms of service?

11 A. I can't remember off the top of my head.

12 Q. I mean, I take it they would all have a  
13 policy against just posting about the wrong time  
14 that the poles opened, right? Or the wrong date to  
15 mail your ballot?

16 A. That would be my assumption, but I do  
17 remember, but I can't remember the specifics as to  
18 why. But I do remember them saying that certain  
19 information we shared with them did not result in  
20 any actions on their part, but I can't remember the  
21 details of those. They were not frequent, but I do  
22 remember that they occurred.

23 Q. In most cases when you flagged something,  
24 it was taken down?

25 A. In most cases -- let me rephrase that.

1           In some cases when we shared information  
2 they would provide a response to us that they had  
3 taken them down.

4           **Q. Got you. Same as the -- go ahead.**

5           A. I would not say it was 100 percent success  
6 rate. If I had to characterize it, I would say it  
7 was like a 50 percent success rate. But that's  
8 just from my recollection.

9           **Q. And the success rate would be the number  
10 of times it got taken down based on the number of  
11 instances you reported?**

12          A. The success rate would be that some action  
13 had been taken because it was a terms-of-service  
14 violation.

15          **Q. Got you. Did this command post, this kind  
16 of activity of relaying these reports of  
17 election-related disinformation, did that occur  
18 through these election command posts in 2022 as  
19 well as 2020?**

20          A. Yes. So to restate, the election command  
21 post from 2020, from my recollection, occurred the  
22 Friday before the election through Tuesday at  
23 midnight. Then for the midterm elections, we only  
24 stood at the command post, I believe, from 8:00  
25 a.m. to 10:00 p.m. of election day.

1           **Q.    So why was it operating longer in 2020?**

2           A.    Based on our experience in the 2018  
3           midterms, where there was a very low volume of  
4           information that needed to be coordinated, we  
5           assessed that we could do with an actual command  
6           post on Tuesday with people on call on Monday and  
7           on Wednesday who, if needed to, could report and  
8           activate a command post. This is specifically for  
9           FBI San Francisco.

10          **Q.    And this command post was chosen to be --**  
11          **I mean, it addresses nationwide election-related**  
12          **information, right?**

13          A.    So every field office, every FBI field  
14          office was mandated by headquarters to stand at a  
15          command post at least on election day.

16                And FBI San Francisco was responsible for  
17          relaying any time, place or manner disinformation  
18          or malign-foreign-influence information to the  
19          social media companies as well as accepting any  
20          referrals from the social media companies.

21          **Q.    So FBI San Francisco had the special job**  
22          **of referring concerns to social media companies?**

23                MR. SUR:  Objection; vague and ambiguous.

24                THE WITNESS:  Yes, and the reason for that  
25          is because the majority of the social media



1 companies are headquartered in FBI San Francisco's  
2 territory.

3 Q. BY MR. SAUER: I am going to move to a  
4 different exhibit, I'm sure you'll be happy to  
5 hear.

6 A. Well, I spent a lot of time on my thesis.

7 Q. Both researching it and testifying about  
8 it today.

9 Let me -- I am showing you an exhibit --

10 MR. SUR: Hang on a second.

11 (Reporter marked Exhibit No. 6 for  
12 identification.)

13 Q. BY MR. SAUER: I am showing you -- can you  
14 see this exhibit --

15 A. Yes.

16 Q. -- defendants' amended objections and  
17 responses on interrogatories?

18 MR. SUR: Counsel, to clarify, this is  
19 Exhibit 6; is that right?

20 MR. SAUER: Yeah. We had to go out of  
21 order, so I am jumping to Exhibit 6 because they  
22 were pre-marked. I just emailed you this one, but  
23 it ought to look familiar.

24 Q. I just want to jump down to Page 37 of  
25 these interrogatory responses. Down here at the

1 bottom of the page under "DHS," do you see this  
2 here, it begins with a bullet point?

3 A. I see a sentence starting with "A  
4 recurring meeting usually entitled USG-industry  
5 meeting."

6 Q. Yes, yeah, that paragraphs states "A  
7 recurring meeting usually entitled USG-industry  
8 meeting, which has generally had a monthly cadence,  
9 and is between government agencies and private  
10 industry." Do you see that description?

11 A. Yes.

12 Q. The CISA-organized meeting that we have  
13 talked about multiple times already, is that  
14 usually entitled USG-industry meeting?

15 A. Based on my recollection, yes.

16 Q. So this interrogatory response appears to  
17 be referring to meetings that we have already  
18 talked about today?

19 A. That is correct, the CISA-facilitated  
20 meeting.

21 Q. It says, "Government participants have  
22 included CISA's Election Security and Resilience  
23 team, DHS's Office of Intelligence and Analysis,  
24 the FBI's foreign influence task force."

25 MR. SUR: Objection; misstates

1 information.

2 Q. BY MR. SAUER: I am asking you if this is  
3 what it says?

4 A. This is what it says, and I remember  
5 sharing with you from my memory those were the  
6 participants. I forgot to mention DOJ National  
7 Security Division, but I do remember that they  
8 sometimes have participants.

9 Q. I take it you participated in some of  
10 these meetings but not all of them?

11 A. That is correct.

12 Q. When did these meetings happen, what  
13 years? Here it just says these monthly cadence  
14 meetings occurred. When did they actually happen?

15 MR. SUR: Objection; lacks foundation.

16 THE WITNESS: I can't remember exactly,  
17 but I believe they started happening before the  
18 2020 election, but I can't remember how far before  
19 the 2020 election.

20 Q. BY MR. SAUER: So they were -- they -- I  
21 guess CISA organized these meetings, I think you  
22 said earlier?

23 A. That is correct, and I was just an  
24 attendee.

25 Q. CISA organized the meetings gearing up

1     **toward the 2020 election; is that right?**

2           A.     For these USG-industry meetings, yes.

3           **Q.     Were hack-and-dump operations discussed at**  
4     **these meetings, or hack-and-leak operations?**

5           A.     Yes, they were.

6           **Q.     Tell me what was discussed about them at**  
7     **these meetings?**

8           A.     The context of hack and dump is what was  
9     the FBI and CISA doing to prevent hack-and-dump  
10    operations.  So from the FBI side, I think we  
11    already -- I already relayed to you that we had the  
12    protective voices initiative.  I can't remember the  
13    specifics, but CISA also discussed its  
14    cybersecurity awareness efforts as well as grants  
15    efforts with the state-, county- and local-level  
16    election officials.

17          **Q.     Did anyone at these meetings tell the**  
18    **industry participants to expect a Russian**  
19    **hack-and-dump operation or hack-and-leak operation**  
20    **shortly before the 2020 election cycle?**

21           MR. SUR:  Objection; lacks foundation.

22           THE WITNESS:  From my recollection, I  
23    remember that the FBI warned -- that I or someone  
24    from the FBI warned the social media companies  
25    about the potential for a 2016-style DNC

1    hack-and-dump operation.

2           **Q.    BY MR. SAUER:  What exactly did you say to**  
3    **the social media companies about that?**

4           A.    Essentially what I just told you.

5           **Q.    You said that there might be a Russian**  
6    **hack-and-dump operation?**

7           A.    So what I said was although we have not  
8    seen any computer intrusions into national-level  
9    political committees or election officials or  
10   presidential candidates at this time, we ask you to  
11   remain vigilant about the potential for  
12   hack-and-dump operations, or something to that  
13   effect.

14          **Q.    Did you specifically refer to the 2016**  
15    **hack-and-dump operation that targeted the DCCC and**  
16    **the DNC?**

17          A.    I believe I did.

18          **Q.    Did you provide any basis to the social**  
19    **media platforms for thinking that such an operation**  
20    **might be coming?**

21          A.    The basis was -- my basis was it had  
22    happened once, and it could happen again.

23          **Q.    Did you have any other specific**  
24    **information other than it had happened four years**  
25    **earlier?**

1 MR. SUR: Objection in so far as the  
2 answer calls for the law enforcement privileged  
3 information.

4 You can answer, if you can, without  
5 divulging the law enforcement privilege as to any  
6 particular investigation.

7 THE WITNESS: Through our investigations,  
8 we did not see any similar competing intrusions to  
9 what had happened in 2016.

10 So although from our standpoint we had not  
11 seen anything, we specifically, in an abundance of  
12 caution, warned the companies in case they saw  
13 something that we did not.

14 **Q. BY MR. SAUER: So did you ask the**  
15 **companies if they had seen any attempts at**  
16 **intrusions or unauthorized access?**

17 A. This is something that we -- that I  
18 regularly ask the companies in the course of our  
19 meetings.

20 **Q. Did you ask them in these meetings?**

21 A. Not at every meeting, but I believe I  
22 asked them at some meetings.

23 **Q. And did you repeatedly warn them at these**  
24 **meetings that you anticipated there might be**  
25 **hack-and-dump operations, Russian-initiated**

1 **hack-and-dump operations?**

2 MR. SUR: Objection; vague, assumes facts  
3 not on the record.

4 THE WITNESS: So repeatedly I would say --  
5 can you -- can you ask your question like -- what  
6 do you mean by "repeatedly"? Like 100 times, five  
7 times?

8 **Q. BY MR. SAUER: Well, did you do it more**  
9 **than once?**

10 A. I did it more -- yes. I warned the  
11 companies about a potential for hack-and-dump  
12 operations from the Russians and the Iranians on  
13 more than one occasion, although I cannot recollect  
14 how many times.

15 **Q. Did anybody else at the FBI talk about**  
16 **hack-and-dump Russian operations?**

17 A. From my recollection, other senior  
18 officials, to include Section Chief Dehmlow, likely  
19 mentioned the possibility of hack-and-dump  
20 operations.

21 **Q. Do you remember Section Chief Dehmlow**  
22 **mentioning it?**

23 A. I said that I believe she mentioned it on  
24 at least one occasion.

25 **Q. What did she say?**

1 A. Essentially what I said. We all said  
2 essentially the same thing.

3 Q. We --

4 A. Which was --

5 Q. Go ahead. Which was?

6 A. Which was -- which was because the Russian  
7 government had hacked a political organization in  
8 2016, that if they were able to do so again for the  
9 2020 cycle, they would likely do it.

10 Q. So you had -- you told the social media  
11 companies that a hack-and-dump operation was  
12 likely?

13 MR. SUR: Objection; misstates the record.

14 THE WITNESS: Let me recharacterize it. I  
15 said potentially as opposed to likely.

16 Q. BY MR. SAUER: Okay. Did Ms. Dehmlow say  
17 likely?

18 A. Not to my recollection. I think she said  
19 potentially as well.

20 Q. You said we all --

21 A. We all, meaning myself and Ms. Dehmlow.

22 Q. Were there any other FBI agents at the  
23 meeting -- at these meetings?

24 A. There were.

25 Q. Who?



1 A. They were GS-14 or under grade employees.

2 Q. From the San Francisco office or  
3 elsewhere?

4 A. Both.

5 Q. Both, okay.

6 A. During -- I'm sorry, let me be more  
7 precise. During the quarterly meetings, there were  
8 multiple FBI agents, as I previously mentioned,  
9 from both the FBI San Francisco field office as  
10 well as other field offices at these meetings.

11 Q. Okay. I think we are talking about two  
12 different sets of meetings because we started  
13 talking about the USG-industry meetings, right,  
14 organized by CISA, correct?

15 A. Oh, okay. You are correct.

16 Q. But then there were also the monthly --  
17 there's quarterly and then monthly and then weekly  
18 meetings between FBI and social media platforms,  
19 right?

20 A. That's correct.

21 Q. And which of those sets of meetings were  
22 the potentiality for Russian hack-and-dump  
23 operations discussed?

24 A. At the FBI-led meetings with FITF and the  
25 social media companies.

1           **Q.    Okay.  How about at these USG-industry**  
2 **meetings that were organized by CISA, were**  
3 **hack-and-dump operations discussed then?**

4           A.    I would say less frequently, but what was  
5 discussed was the potential for Russian  
6 hack-and-dump-style operations.

7           **Q.    Okay.  And who -- was that raised by FBI**  
8 **or was that raised by others or both?**

9           A.    I can't recollect, but I would say I know  
10 at least the FBI mentioned this, specifically in  
11 the context of the 2016 DNC hack.

12           **Q.    So the FBI, would it be you and**  
13 **Ms. Dehmlow, right?**

14           A.    Among others.

15           **Q.    So others would have raised that as well**  
16 **at these USG-industry meetings?**

17           A.    Others from the FBI attended those  
18 meetings.

19           **Q.    Did those others raise the issue of**  
20 **Russian hack-and-dump operations?**

21           A.    I can't recollect.

22           **Q.    Do you know whether they did or didn't?**

23           A.    I know that I did.

24           MR. SAUER:  Later, Mr. Sur, I am going to  
25 ask for the identities of those participants.  I

1 can ask him now on the record under oath, or you  
2 can agree to give them to me in a private -- in a  
3 private communication. Can we agree to do that?

4 MR. SUR: Just -- just to be clear, are  
5 you looking for below the SES level?

6 MR. SAUER: Yes. I want the identities of  
7 every FBI official who was at the USG-industry  
8 meetings referred to in this interrogatory response  
9 in 2020.

10 MR. SUR: Okay. I will discuss it with  
11 the clients obviously.

12 MR. SAUER: All right. Then I am asking  
13 him now on the record.

14 **Q. Who was there? Name the FBI officials who**  
15 **were there regardless of their levels?**

16 MR. SUR: Well, I'm sorry, when you say  
17 regardless of the level, can you -- can we provide  
18 you part of the name on the record and part of the  
19 name off the record?

20 MR. SAUER: If you're willing to give me  
21 the information, which you did not just agree to, I  
22 don't have to ask him on the record. We need the  
23 information. You don't want it on the record.  
24 Will you agree to give it to me? You said, "I have  
25 to discuss it with my clients." I can't reconvene

1 this deposition. I need the information. You can  
2 agree to give it to me. I am going to ask him now  
3 because it is not subject to a protective order.

4 MR. SUR: Okay. If anything, Counsel, a  
5 break would be appropriate.

6 MR. SAUER: Okay.

7 MR. SUR: So I can -- I'm sorry?

8 MR. SAUER: We can go off the record.

9 MR. SUR: Okay.

10 THE VIDEOGRAPHER: Off the record at 2:11  
11 p.m.

12 (Whereupon a recess was taken.)

13 THE VIDEOGRAPHER: Back on the record at  
14 2:34 p.m.

15 **Q. BY MR. SAUER: Back on the record,**  
16 **Mr. Chan, after some discussions off the record.**

17 **You testified earlier that at these 2020**  
18 **meetings between the FBI and social media platforms**  
19 **where the risk of a Russian hack-and-leak operation**  
20 **was discussed, they were attended by you and**  
21 **Ms. Dehmlow, right?**

22 A. That is correct, on some occasions. I  
23 don't think either of us has attended all of the  
24 meetings with the CISA-hosted USG-industry  
25 meetings.

1 Q. And then there were also the quarterly,  
2 monthly, weekly cadence meetings involving just  
3 FITF and the social media platforms, right?

4 A. That is correct, and other FBI field  
5 offices to include FBI San Francisco.

6 Q. And the risk of hack-and-leak operations  
7 were raised at both sets of meetings, both at  
8 CISA-organized USG-industry meetings and the  
9 FITF-organized direct meetings between the FBI and  
10 social media platforms, right?

11 A. Yes.

12 Q. Okay. As to the first set of meetings,  
13 the CISA-organized USG-industry meetings, other FBI  
14 officials besides you and Ms. Dehmlow attended when  
15 Russian hack-and-leak operations were discussed,  
16 right?

17 A. That is correct.

18 Q. Who?

19 A. So from my recollection, and I don't know  
20 who attended which meetings, but I remember being  
21 in meetings with the following people: Brady  
22 Olson, William Cone, Judy Chock and Luke Giannini.

23 Q. Can you say the last name again?

24 A. Giannini.

25 Q. Spell it, please.

1           A.    I am not sure, but I believe it is  
2   G-i-a-n-n-i-n-i.

3           **Q.    And then the second name was William**  
4   **Cohen, is that C-o-h-e-n?**

5           A.    Cone, C-o-n-e.

6           **Q.    Like the -- like the shake?**

7           A.    Like an ice cream.

8           **Q.    Any other FBI officials at that set of**  
9   **meetings where Russian hack-and-leak operations**  
10 **were discussed with social media platforms in 2020?**

11          A.    Those are the only people I can remember.

12          **Q.    Okay.  Then talk about the other set of**  
13 **meetings, the FITF FBI meetings with social media**  
14 **platforms in -- with the quarterly, then monthly,**  
15 **then weekly cadence, what FBI officials attended**  
16 **those meetings where Russian hack-and-leak**  
17 **operations were discussed?**

18          A.    So it's the exact same set of names that I  
19   recollect.

20          **Q.    Did anyone --**

21          A.    I cannot remember what days -- or, you  
22   know, which meetings that they attended because  
23   William Cone and Wayne Brady both work in the same  
24   unit, and I can't remember if they both attended or  
25   if one attended or another.  So I can't remember

1 when. I do remember that at some point these  
2 individuals have attended the FBI bilateral  
3 meetings with the social media companies.

4 **Q. And you said the names are Brady Olson; is**  
5 **that correct?**

6 A. Yes.

7 **Q. Okay.**

8 A. Olson.

9 **Q. Is that O-l-s-o-n?**

10 A. Maybe, or it might be s-e-n. I can't  
11 remember. It's one of those spellings.

12 **Q. William Cone; is that right?**

13 A. Yes.

14 **Q. Judy Chock; is that right?**

15 A. C-o -- I'm sorry, C-h-o-c-k.

16 **Q. And then someone Giannini, right? What**  
17 **was that person's first name?**

18 A. Luke.

19 **Q. Luke?**

20 A. Luke.

21 **Q. Is that L-u-k-e?**

22 A. I think his full name might be Lucas,  
23 L-u-c-a-s, but I refer to him as Luke.

24 **Q. Are all those people from FITF in**  
25 **Washington, D.C.?**

1 A. Yes.

2 Q. Okay. What are their -- what are their  
3 titles, do you know?

4 A. I do know. So I believe -- oh, the first  
5 four are unit chiefs, and then Luke is an assistant  
6 section chief.

7 Q. What are they unit chiefs of? Are they  
8 chiefs of like the Russian unit or --

9 A. Yeah, correct.

10 Q. Which one is the section chief, did you  
11 say?

12 A. Assistant section chief.

13 Q. So that's --

14 A. Excuse me?

15 Q. Is that the number two person under  
16 Ms. Dehmlow?

17 A. Yes.

18 Q. Okay.

19 (Discussion off the record.)

20 THE WITNESS: Yes, Mr. Luke Giannini is  
21 the assistant section chief at the Foreign  
22 Influence Task Force.

23 Q. BY MR. SAUER: So at FITF, these meetings  
24 include, in addition to you, the number one person  
25 at FITF, Laura Dehmlow; the number two person at



1 **FITF, Mr. Giannini; and then at least three section**  
2 **chiefs at FITF, correct?**

3 A. No, that's not correct. Ms. Dehmlow is a  
4 section chief.

5 **Q. Okay.**

6 A. Mr. Giannini is an assistant section  
7 chief, and then the other individuals are unit  
8 chiefs.

9 **Q. Got you. Did -- did anyone other than you**  
10 **or Ms. Dehmlow discuss the possibility or prospect**  
11 **of Russian hack-and-leak operations at these**  
12 **meetings from the FBI?**

13 A. I can't recollect if others have said it,  
14 but I know that that is something that I would say  
15 regularly.

16 **Q. You said that regularly in these meetings?**

17 A. Yes. Not every meeting, but some  
18 meetings.

19 **Q. And does that apply both to the**  
20 **USG-industry meetings that had many participants?**

21 A. I would say for the bilateral FITF  
22 meetings, I would have said that because those  
23 would have been one of the types of  
24 malign-influence campaigns that I would have been  
25 focused on.

1           For the DHS USG meetings, I was more of an  
2 attendee and not as active as a speaking  
3 participant.

4           **Q. Did anyone else at those meetings, the**  
5 **USG-industry meetings organized by CISA, address**  
6 **the risk or prospect of Russian hack-and-leak**  
7 **operations?**

8           A. I believe they did, but I can't remember  
9 who would have said it.

10          **Q. Would it have been anyone at the FBI?**

11          A. It may have been.

12          **Q. Which one of these people is the head of**  
13 **the Russia unit?**

14          A. Mr. Olson and then after him, Mr. Cone.

15          **Q. Did Mr. Olson or Mr. Cone ever address the**  
16 **risk of a Russian hack-and-leak operation?**

17          A. I don't recollect.

18          **Q. How about Ms. Dehmlow?**

19          A. I don't specifically recollect, but I  
20 believe that is something she would have mentioned.

21          **Q. Do you think she raised it at some point**  
22 **in these meetings?**

23          A. Yes.

24          **Q. What did she say about it to your**  
25 **recollection?**

1           A.     It would have been that the FBI is  
2     concerned about the potential for hack-and-leak or  
3     hack-and-dump operations from foreign  
4     state-sponsored actors, something to that effect.

5           **Q.     Did you discuss within FITF that risk**  
6     **before you raised it with the social media**  
7     **platforms?**

8           MR. SUR:   Objection; an internal  
9     deliberation of that sort would be subject to the  
10    deliberative process privilege, attorney-client  
11    privilege and other privileges.

12          **Q.     BY MR. SAUER:   Did anyone at any time**  
13    **discuss that prospect with you or did you raise it**  
14    **on your own?**

15          MR. SUR:   Same objection.

16          You can answer insofar as it doesn't  
17    involve internal discussions within FITF or  
18    discussions with counsel.

19          THE WITNESS:  I would say in general the  
20    FBI had internal meetings or discussions or at the  
21    very least emails, coordination before the  
22    CISA-hosted meetings.

23          **Q.     BY MR. SAUER:   So there would be internal**  
24    **discussion within the FBI before the CISA-hosted**  
25    **meetings?**

1           A.     Yes, about what agenda items would be  
2     discussed during the meeting.

3           **Q.     In the course of those discussions, did**  
4     **anyone suggest to you that you should raise the**  
5     **risk of a Russian hack-and-leak operation?**

6           MR. SUR:  Objection; as I said before, it  
7     calls for internal deliberations which would be  
8     covered by the deliberative process privilege, by  
9     the attorney-client privilege and other privileges,  
10    including law enforcement.

11          THE WITNESS:  Yeah, I will reiterate in  
12    general, we would have internal discussions about  
13    what would be discussed in the CISA-hosted meeting.

14          **Q.     BY MR. SAUER:  More specifically, did**  
15    **anyone suggest that -- let me ask you this:  You**  
16    **raised it at these meetings, right?**

17          A.     I know that I have raised it at the  
18    meetings.

19          **Q.     Did you do that on your own accord or did**  
20    **anyone else suggest to you that it should be**  
21    **raised?**

22          MR. SUR:  Objection; as before, it's  
23    covered by multiple privileges, and I am going to  
24    instruct the witness not to answer on grounds of  
25    deliberative process privilege, attorney-client

1 privilege, law enforcement privilege, among others.

2 Q. BY MR. SAUER: Are you declining to answer  
3 the question, sir?

4 A. I am reiterating that I recollect  
5 mentioning the potential for hack-and-dump  
6 operations during the CISA-hosted USG-industry  
7 meetings.

8 Q. Did you do that solely on your own accord?

9 MR. SUR: Same objection as before.

10 MR. SAUER: That doesn't ask for any  
11 communications. Did he do it solely on his own  
12 accord? Are you instructing him not to answer that  
13 question?

14 THE WITNESS: I cannot recollect.

15 Q. BY MR. SAUER: Okay. I think we are going  
16 to make a record on this.

17 I am asking you, did anyone within the FBI  
18 discuss or suggest with you that you should raise  
19 the prospect of Russian hack-and-leak operations  
20 with social media platforms in 2020?

21 A. I do not recollect. In the context of the  
22 USG-industry CISA-held meetings, I do not  
23 recollect.

24 Q. How about in the context of the bilateral  
25 FITF social media platform meetings, in that

1 **context did anyone suggest it to you?**

2 A. So in that context, depending on what was  
3 being briefed, without getting into the specific  
4 investigations, certain -- as I mentioned  
5 previously, certain nation state actors the FBI  
6 deemed as potentially being capable of conducting  
7 hack-and-leak operations.

8 So at the beginning of the meetings, I  
9 would preface and say something to the effect of  
10 "We are going to provide you a briefing on this  
11 group because they have the potential to conduct  
12 hack-and-leak operations like the Russians did in  
13 2016."

14 **Q. Did anyone suggest to you that you should**  
15 **raise that concern to the social media platforms at**  
16 **any time?**

17 A. In the context of the FITF meetings with  
18 the companies, I flagged that concern because I was  
19 generally responsible in coordination with FITF for  
20 coming up with the agenda for those meetings with  
21 the social media companies.

22 **Q. So are you saying -- what's your answer to**  
23 **my question did anyone -- anyone suggest to you in**  
24 **the context of the FITF social media company**  
25 **meetings that you should raise the concern about a**

1 **Russian hack-and-leak operation?**

2 A. I do not recollect. However, I would have  
3 flagged that comment on my own for the reasons I  
4 just stated to you.

5 **Q. So it is something that you would have**  
6 **done on your own, but someone might have also**  
7 **suggested to you to do it; is that fair to say?**

8 A. They may have, but I don't recollect at  
9 this time.

10 **Q. Returning to the -- returning to the**  
11 **USG-industry CISA-organized meetings, do you recall**  
12 **anyone discussing with you at any time the prospect**  
13 **of Russian hack-and-leak operations in connection**  
14 **with those meetings?**

15 A. Who do you mean?

16 **Q. Anybody. Did anybody on earth talk to you**  
17 **about raising Russian hack-and-leak operations at**  
18 **those meetings?**

19 A. Do you mean from the social media  
20 companies or from the government side? Because in  
21 either case, I don't recollect.

22 **Q. Okay. How about anyone outside the**  
23 **government, did anyone outside the government**  
24 **discuss the prospect of Russian hack-and-leak**  
25 **operations with you?**

1           A.    I do remember during the CISA-hosted  
2           USG-industry meetings that the social media  
3           companies would ask the FBI if they were aware of  
4           any hack-and-leak operations, and I remember that  
5           we would say ahead of the 2020 elections that we  
6           were not aware of any hack-and-leak operations, but  
7           that there was always the potential for there to be  
8           hack-and-leak operations.

9           **Q.    Did the FBI tell the social media**  
10          **companies that there would be a specific risk of a**  
11          **hack-and-leak operation shortly before the election**  
12          **in 2020?**

13          A.    I believe that we did mention that as a  
14          possibility shortly before the election, perhaps in  
15          the August or October time frame.

16          **Q.    So you mentioned that there -- you**  
17          **mentioned that there was a risk that a**  
18          **hack-and-leak operation could happen in October?**

19          A.    So to be specific, what we mentioned was  
20          that there was the general risk of hack-and-leak  
21          operations, especially before the election.

22                  However, we were not aware of any  
23          hack-and-leak operations that were forthcoming or  
24          impending.

25          **Q.    Were you involved in the investigation of**



1 **the 2016 DNC hack-and-leak operation?**

2 MR. SUR: Objection; vague.

3 THE WITNESS: What do you mean by  
4 "involved"?

5 **Q. BY MR. SAUER: Well, did you have any --**  
6 **were you in any way involved in that investigation?**

7 A. Yes.

8 **Q. What was your involvement?**

9 A. I was the supervisor for a squad that had  
10 an investigation associated with the hack of the  
11 DNC and DCCC.

12 **Q. And what was your role in that**  
13 **investigation? What did your squad do?**

14 A. I was the supervisor for the squad that  
15 ran one of the investigations associated with the  
16 2016 DNC hack.

17 **Q. What did your squad do in that**  
18 **investigation?**

19 MR. SUR: I am going to object on the law  
20 enforcement privilege grounds. If you can answer  
21 the question without discussing any particular  
22 investigation or files or contents, you can answer.

23 MR. SAUER: Before you say that, I am  
24 going to read some case law into the record. The  
25 investigative -- the law enforcement privilege

1 states, quote, investigative files with ongoing  
2 privilege investigation. That's from Coughlin  
3 against Lee, 946 F.2d 1152, 1159, Fifth Circuit  
4 1991. The privilege, quote, is bounded by  
5 relevance and time constraints and it lapses either  
6 at the close of an investigation or at a reasonable  
7 time thereafter based on the particularized  
8 assessment of documents.

9 We are talking about an investigation that  
10 happened six years ago. Is it your position that  
11 you can assert law enforcement privilege with  
12 respect to that? Is my first question.

13 Second one -- I'm not finished yet.  
14 Second one is the documents relating to emails  
15 relating to his involvement in this investigation  
16 are publicly filed in the docket of the case United  
17 States against Sussmann. So there's been a waiver  
18 of that by those being publicly filed, in any  
19 event. So now I am going to repeat the question.

20 **Q. What did your squad do when it came to the**  
21 **investigation of the DNC hack-and-leak operation?**

22 A. Can I confer with my counsel before I  
23 answer this question?

24 **Q. I want an answer to the question.**

25 MR. SUR: Yeah, so let me just clarify.

1 The objection based on law enforcement privilege, I  
2 understand your position about the public  
3 disclosure. But since you're not limiting your  
4 question to what was in the public record, there  
5 are cases that describe the application of the law  
6 enforcement privilege to techniques that have  
7 future application, including future  
8 investigations.

9 So I don't think that the mere fact that  
10 your question is about a past investigation will  
11 overcome the law enforcement privilege concern.

12 MR. SAUER: Well, why doesn't he answer  
13 the question in general terms, and then we'll get  
14 into specifics about law enforcement techniques? I  
15 am not really concerned about those. Can he say it  
16 in general terms?

17 THE WITNESS: Based on the case law you  
18 cited, the information I have would be protected  
19 under the first. Because this is an existing and  
20 pending -- and active investigation.

21 **Q. BY MR. SAUER: So you're saying that the**  
22 **2016 DNC server leak investigation is an active**  
23 **criminal investigation?**

24 A. What I am saying is that the investigation  
25 of the individuals associated with the DNC hack of

1 2016 is an existing and active investigation.

2 **Q. I thought they were being indicted on**  
3 **other charges later. Are you saying that there's**  
4 **still an active and pending criminal investigation**  
5 **of the 2016 DNC hack?**

6 A. I am not saying there is a pending  
7 investigation of the 2016 hack itself. However,  
8 there is active investigations on the individuals  
9 involved with the 2016 hack. That case has not  
10 been adjudicated. The individuals have been  
11 indicted. They have not been arrested. They have  
12 not been going through the judicial process. This  
13 is an active investigation.

14 (Reporter marked Exhibit No. 23 for  
15 identification.)

16 **Q. BY MR. SAUER: I am showing you a**  
17 **collective exhibit that we have pre-marked as**  
18 **Exhibit 23. Do you see this document?**

19 A. Yes.

20 **Q. These are some of your emails that are**  
21 **publicly filed in the case the United States versus**  
22 **Sussmann. Do you recognize them?**

23 MR. SUR: I'm sorry, may I ask, Counsel,  
24 have you sent this to us?

25 MR. SAUER: Let me email it to you right

1 now. Obviously it wasn't -- we are getting a bit  
2 out of order here.

3 **Q. Looking at this email, does this refresh**  
4 **your recollection about what your involvement was**  
5 **during that investigation?**

6 MR. SUR: Counsel, may I ask that I  
7 receive the email first so I can pull it up on the  
8 iPad so Mr. Chan can see the exhibit that you are  
9 talking about?

10 MR. SAUER: Can you see it on the screen  
11 share? The emails were sent to you.

12 MR. SUR: Okay. We have this PDF. May I  
13 ask which page you're on?

14 MR. SAUER: Start on the top page.

15 **Q. Do you see that, the one on the screen**  
16 **share?**

17 A. 8:32 a.m. October 4th, yes, I see this  
18 email.

19 **Q. And you are being copied on emails lower**  
20 **down from Michael Sussmann at Perkins Coie; is that**  
21 **fair to say?**

22 A. Yes, I have been cc'd. The email is to  
23 another DOJ official.

24 **Q. And then you forward that along to other**  
25 **FBI officials, Patricia Rich and Delynn Hammell.**

1 Do you see that?

2 A. Yes, I see that.

3 Q. Do you know why Mr. Sussmann was copying  
4 you on an email about sharing information on a  
5 rolling basis?

6 A. Because I was involved with -- I oversaw  
7 the squad that was responsible for one of the  
8 investigations of the 2016 hack of the DNC, and  
9 Mr. Sussmann was their legal representative.

10 Q. Which squad did you oversee?

11 A. I oversaw the Russian cyber squad at FBI  
12 San Francisco.

13 Q. And the Russian cyber squad was  
14 involved -- was it involved in trying to analyze  
15 the DNC server to see how it had been hacked?

16 A. Yes, that is correct.

17 Q. And you oversaw that effort?

18 A. Yes. I managed the squad responsible for  
19 one of the investigations of the DNC hack.

20 Q. What did that squad -- did that squad  
21 investigate the server?

22 A. We did a triage investigation of the  
23 server and then sent it back to headquarters to do  
24 a more complete investigation of the server.

25 Q. What's a triage investigation?

1           A.     Triage in cyber -- cybersecurity context  
2     is to try to extract indicators. As I mentioned  
3     before, indicators can be email accounts, IP  
4     addresses, other types of electronic indicia that  
5     we could serve legal process in order to move our  
6     investigation forward.

7           **Q.     Did you find any indicia of that when you**  
8     **investigated the server?**

9           A.     I believe we did, but I can't recollect  
10    the specific selectors that we discovered.

11          **Q.     Subsequent to -- subsequent to the 2016**  
12    **investigation, did you have further communications**  
13    **with anyone involved in that investigation about**  
14    **the possibility of a recurrence in 2020?**

15          A.     Can you repeat that question?

16          **Q.     Subsequent to the 2016 investigation of**  
17    **the hack of the DNC server, did you have any**  
18    **communications with anyone involved in that**  
19    **investigation about the possibility that a**  
20    **hack-and-leak operation could occur before the 2020**  
21    **election?**

22                 MR. SUR: Objection; vague. I also object  
23    on the grounds of law enforcement privilege.

24                 You can answer to the extent it doesn't  
25    implicate any particular investigation.

1 THE WITNESS: Yeah, so I do not remember  
2 discussing the potential for a 2020 election with  
3 any of the FBI personnel because they had moved on  
4 to different roles.

5 Q. BY MR. SAUER: How about people outside  
6 the FBI?

7 A. Well, Sean Newell, who is the email  
8 recipient on this, is a deputy chief at DOJ  
9 National Security Division. He would have been one  
10 of the senior officials I would have consulted  
11 with.

12 Q. Consulted with about what?

13 A. About potential Russian interference in  
14 the 2020 elections.

15 Q. Did you consult with Sean Newell about the  
16 potential for a Russian hack-and-leak operation?

17 MR. SUR: I am going to renew the  
18 objection based on the law enforcement privilege  
19 and ask that you not answer insofar as that would  
20 disclose the contents of any individual  
21 investigation.

22 THE WITNESS: My recollection was that  
23 being the deputy chief at DOJ NSD, Sean Newell  
24 would have overview of multiple FBI investigations  
25 and would have a broader perspective than my



1 perspective from the field office.

2 So I would regularly just ask him in  
3 general how things were going and if they were  
4 seeing anything that would be impactful to us at  
5 FBI San Francisco.

6 **Q. BY MR. SAUER: So you -- did these**  
7 **conversations with Sean Newell occur in the lead-up**  
8 **to the 2020 election?**

9 A. I don't remember having many conversations  
10 with Mr. Newell during the lead-up to the 2020  
11 elections.

12 **Q. When did the conversations with Mr. Newell**  
13 **occur?**

14 A. They would have -- I can't recollect  
15 specifically. I regularly have conversations with  
16 Mr. Newell outside of the context of Russian  
17 disinformation campaigns targeted at the 2020  
18 elections. Because Mr. Newell, as a deputy chief,  
19 oversaw all of DOJ's national security cyber  
20 investigations.

21 **Q. Did Mr. Newell ever tell you that he**  
22 **expected there might be a Russian hack-and-leak**  
23 **operation before the 2020 election?**

24 MR. SUR: Objection on the grounds of law  
25 enforcement privilege, also attorney-client

1 privilege, given the functions of Mr. Newell in  
2 this context. I will ask that the witness answer  
3 only without referring to attorney-client  
4 communications. For everything in this context you  
5 can't, so...

6 THE WITNESS: What I can broadly say is  
7 that we discussed national security cyber  
8 investigations in general, sometimes about Russian  
9 matters, sometimes about other nation state  
10 threats.

11 Q. BY MR. SAUER: Let me ask the question  
12 more specifically. Prior to the 2020 election  
13 cycle, did anyone suggest to you that there would  
14 be -- or that there might be a Russian  
15 hack-and-leak operation prior to the 2020 election?

16 MR. SUR: So I am going to object on the  
17 grounds of law enforcement privilege and  
18 attorney-client and all other privileges.

19 You can answer insofar as it doesn't  
20 disclose the contents of any particular  
21 investigation.

22 Q. BY MR. SAUER: Okay. I want an answer,  
23 and I want to know whether you're withholding  
24 information in response to your client's  
25 instruction. He keeps instructing you

1 conditionally, and then you keep providing vague  
2 responses.

3 I want to know are you, in fact,  
4 withholding information from me in response to my  
5 question as a result of that instruction. Did  
6 anyone discuss that with you?

7 A. I am not --

8 Q. That is not going to get into the content  
9 of any -- content of any communications. I just  
10 want to know did anyone discuss with you the  
11 prospect of a Russian hack-and-leak operation  
12 before the 2020 election?

13 A. So no, I do not recollect. The reason for  
14 that is I don't recollect any specific person  
15 discussing that with me.

16 However, based on both my experience as  
17 well as my knowledge of active investigations, I  
18 would have believed -- as my own assessment, I  
19 believe that there was the potential for  
20 hack-and-leak operations ahead of the 2020  
21 elections.

22 I believe that there was the potential for  
23 hack-and-leak operations ahead of the 2022  
24 election, and I believe that there is the potential  
25 for Russian hack-and-leak operations ahead of the

1 2024 elections.

2 Q. In particular, you relayed that belief to  
3 the social media platforms on multiple occasions in  
4 two sets of meetings in 2020, correct?

5 A. That is correct.

6 Q. And that includes the USG-industry  
7 meetings organized by CISA, correct?

8 A. Yes, I believe so.

9 Q. And it includes the FITF organized  
10 meetings with the individual social media  
11 platforms, correct?

12 A. Yes.

13 Q. Did any -- did the social media platforms  
14 respond to that, your communications that indicate  
15 that they were taking any steps with respect to any  
16 Russian hack-and-leak operations?

17 MR. SUR: Objection; vague.

18 THE WITNESS: So in general, I believe  
19 that the companies were actively looking for  
20 hack-and-leak operations, and I don't know the  
21 types of technology that they use, but I believe  
22 they use -- they tried to use detection methods  
23 that would find whatever hacked materials were put  
24 or uploaded onto their platforms.

25 Q. BY MR. SAUER: Did they ever tell you that

1     **they were taking any action with respect to any**  
2     **content posted on social media because of a concern**  
3     **about a hack-and-leak operation?**

4           A.     So from my recollection, I remember -- I  
5     can't remember which social media companies, but  
6     some social media companies adjusted or updated  
7     their terms of service or their community standards  
8     to say that they would not post any hacked  
9     materials. I believe the reason would be due to  
10    privacy issues of the victim. But I can't  
11    recollect which company said that.

12           **Q.     When did those updates occur, do you**  
13    **recall, before the 2020 election?**

14           A.     Before the 2020 elections, but I can't  
15    remember when. I believe -- I believe the impetus  
16    was in case there was a 2016-style hack-and-leak  
17    operation.

18           **Q.     So is that -- was that a concern that you**  
19    **raised to them specifically that there might be a**  
20    **recurrence of a 2016 style hack-and-leak operation?**

21           A.     So I have raised that concern, but I  
22    believe independently they had similar concerns.

23           **Q.     And in the same time frame that you were**  
24    **raising that concern, some of them updated their**  
25    **terms of service to prohibit the posting of hacked**

1 **materials?**

2 A. I believe so.

3 **Q. Did you ever discuss updating their terms**  
4 **of service with them or suggested it to them?**

5 A. I never suggested it to them. The only  
6 context we would bring up terms of service is that  
7 we wanted to know if they had changed their terms  
8 of service or modified it, and we wanted to know  
9 what they had changed.

10 **Q. Did they advise you that they had changed**  
11 **it to reflect the ability to pull down content that**  
12 **results from hack operations?**

13 A. Yes.

14 **Q. And that occurred at some time after you**  
15 **had raised these concerns with them?**

16 A. Some time after 2016, but before 2020. So  
17 unfortunately I can't remember when they would have  
18 updated it, but I do remember learning about their  
19 terms of service updates.

20 **Q. During 2020 do you recall anyone at the**  
21 **FBI discussing with you the prospect of a**  
22 **hack-and-leak operation?**

23 A. I believe that we internally discussed the  
24 potential for hack-and-leak operations, and so I  
25 regularly was in communication with the cyber

1 division of the FBI as well as with the Foreign  
2 Influence Task Force to see if they had heard of  
3 anything that I had not heard of.

4 So I would say that the people that I  
5 communicate with, everyone was vigilant, but no  
6 one -- I believe that in general people at the FBI  
7 were concerned about the potential for  
8 hack-and-leak operations, but that we had not seen  
9 any investigations that led in that direction or  
10 that would lead us in that direction.

11 **Q. Who are the people at the cybersecurity**  
12 **division that you referred to?**

13 A. So cyber division -- I can't even remember  
14 the individuals now. And the reason for that is  
15 they tend to rotate -- they rotate out every 18  
16 months.

17 **Q. How about FITF, who are the individuals at**  
18 **FITF that discussed the concern with you?**

19 A. So it was the three individuals that I  
20 mentioned to you -- I'm sorry, the four individuals  
21 that I have mentioned to you. Specifically,  
22 Ms. Dehmlow, Mr. Olson, Mr. Cone and then  
23 Mr. Giannini.

24 **Q. And did all of those people express to you**  
25 **a concern about the possibility of a Russian**

1 **hack-and-leak operation?**

2 MR. SUR: Objection; mischaracterizes his  
3 testimony.

4 THE WITNESS: From my recollection, we all  
5 shared the same concern for the potential for there  
6 to be a hack-and-leak operation.

7 **Q. BY MR. SAUER: Did you have any basis for**  
8 **that other than the fact that one had occurred in**  
9 **2016?**

10 A. My basis for that was the hack-and-dump  
11 operation in 2016 as well as our knowledge of the  
12 skills of the Russian hackers who were involved.

13 **Q. Any other basis besides that?**

14 A. No. Those were the two primary reasons  
15 driving our concern.

16 **Q. In 2020 did you ever discuss the**  
17 **possible -- or did anyone discuss with you the**  
18 **possibility of a Russian hack-and-leak operation**  
19 **before the 2020 election from outside the FBI other**  
20 **than legal counsel?**

21 A. I believe that the companies would  
22 regularly ask if the FBI was aware of any  
23 hack-and-leak operations ahead of the 2020  
24 elections. We were not aware of any hack-and-leak  
25 operations.



1           However, as I mentioned, we would provide  
2           briefings about nation state groups that  
3           potentially had the capability of conducting  
4           hack-and-leak operations.

5           **Q.    Okay.  Other than the social media**  
6           **platforms, anybody else discuss that with you?**

7           A.    Not to my recollection.  Up.  Not to my  
8           recollection.

9           **Q.    You said "up"?**

10          A.    "Up" because we had already mentioned the  
11          FBI employees.  We mentioned the social media  
12          companies.  The reason I said "up" is because  
13          technically Microsoft is not a social media  
14          company.

15          **Q.    Did Microsoft discuss it with you?**

16          A.    During the -- they discussed their concern  
17          during the CISA-hosted USG-industry meetings.

18          **Q.    What did they say?**

19          A.    I think -- I can't recall exactly, but  
20          they shared the same sentiment about being  
21          concerned for a potential Russian hack-and-leak  
22          operation.

23          **Q.    Who said that?**

24          A.    The individual from Microsoft, his first  
25          name is Jan, J-a-n, but I can't remember his last

1 -- I can't remember how to -- his last name, or  
2 even how to spell it.

3 **Q. Antonaros, something like that?**

4 A. Maybe. I definitely remember his first  
5 name was Jan, and he had a last name that I am not  
6 familiar with.

7 **Q. Does it begin with an A-n-t?**

8 A. That doesn't sound familiar. It feels  
9 like it was a Scandinavian name, like Stevrud or  
10 something. I don't remember why, but for some  
11 reason I thought it sounded Scandinavian.

12 **Q. Did any other social media platform**  
13 **discuss these things in the USG-industry meetings?**

14 MR. SUR: Objection; vague.

15 **Q. BY MR. SAUER: Did any other social media**  
16 **platforms discuss the prospect of having these**  
17 **operations, or hack-and-dump operations in the**  
18 **USG-industry meetings?**

19 A. I would say not to my recollection because  
20 the primary individuals who spoke from the social  
21 media companies were the three companies that I  
22 previously referred to you, which is Facebook,  
23 Google and Twitter and then Microsoft. Those were,  
24 from my recollection, the four companies that spoke  
25 the most frequently. If individuals or

1 representatives from the other companies spoke, I  
2 don't recall what they said.

3 **Q. Did Facebook, Twitter or YouTube/Google**  
4 **representatives address this issue at all of the**  
5 **prospect of hack-and-leak operations?**

6 A. So during the CISA USG-industry meetings,  
7 I believe that those companies regularly flagged  
8 this as a concern at each meeting, or at least at  
9 most meetings they would ask if the U.S. government  
10 had any information about potential hack-and-leak  
11 operations.

12 **Q. How about other government agencies**  
13 **outside the FBI at these meetings, the USG-industry**  
14 **meetings, did any of them discuss the risk or**  
15 **prospect of Russian hack-and-leak or hack-and-dump**  
16 **operations?**

17 A. So from my recollection, CISA would  
18 discuss it from the standpoint of cybersecurity.  
19 Namely if an organization or individual has good  
20 cybersecurity, that will minimize the risk of being  
21 hacked. So that was their standpoint. So they  
22 were focused on cybersecurity and infrastructure  
23 protection.

24 **Q. Who is "they"? What individuals were**  
25 **saying this?**

1           A.     So as I mentioned to you before, the only  
2 individuals I remember who regularly spoke at these  
3 meetings were Mr. Masterson and Mr. Scully.

4           **Q.     And those individuals discussed how to**  
5 **defend against hacking operations?**

6           A.     Yes.

7           **Q.     Did they specifically say that they**  
8 **anticipated or there was a risk that there might be**  
9 **Russian hack-and-leak operations before the 2020**  
10 **election?**

11          A.     I don't specifically recall, but that  
12 sounds like something that they would have the  
13 general -- they would have the same concern or  
14 similar concern that I have.

15          **Q.     They might -- you believe they expressed**  
16 **that concern in these meetings?**

17          A.     I do not recall any specific situations  
18 where they did, but that, I believe, is something  
19 that they may have discussed.

20          **Q.     And that would include both Mr. Masterson**  
21 **and Mr. Scully, to your recollection?**

22          A.     Yes.

23          **Q.     Were you aware in 2020 that the FBI had**  
24 **Hunter Biden's laptop in its possession?**

25                 MR. SUR:  Objection; lacks foundation,

1 calls for speculation.

2 Q. BY MR. SAUER: Did you know it at the  
3 time?

4 A. I was only aware when news media outlets  
5 posted it, or published it.

6 Q. Was Hunter Biden referred to in these  
7 meetings in any way?

8 A. Hunter Biden was not -- in my  
9 recollection, Hunter Biden was not referred to in  
10 any of the CISA USG-industry meetings.

11 Q. How about the FITF social media company  
12 meetings?

13 A. From my recollection, one meeting with  
14 Facebook after the regular agenda had been  
15 completed, one of the Facebook analysts asked if  
16 the FBI had any information they could share about  
17 the Hunter Biden investigation.

18 To that I recall Ms. Dehmlow saying that  
19 the FBI had no comment.

20 Q. Would that have been before or after the  
21 big -- the big news story broke on October 14th of  
22 2020?

23 MR. SUR: Objection; lacks foundation.

24 THE WITNESS: I am not certain, but I  
25 believe that it would have had to have been after

1 the news story broke because I don't know if it was  
2 publicly known then.

3 Q. BY MR. SAUER: Do you know that in 20- --  
4 so you remember sometime in 2020 a Facebook analyst  
5 asked the FBI to comment on the status of the  
6 Hunter Biden investigation?

7 A. That's correct.

8 Q. And you believe that this occurred after  
9 there had been, you know, a New York Post article  
10 about the contents of the laptop that you referred  
11 to -- I think you referred to earlier you finding  
12 out about it that way, right?

13 A. Yeah, I only found out through news media.  
14 I have no internal knowledge of that investigation,  
15 and yeah, I believe that it was brought up after  
16 the news story had broke.

17 Q. And so the -- what did the Facebook  
18 analyst ask Ms. Dehmlow? Did they ask, you know,  
19 "Hey, we have the story. Can you confirm it," or  
20 what did they ask?

21 A. Yeah, they just -- I can't remember the  
22 exact question, but I believe the investigator  
23 asked if the FBI could provide any information  
24 about the Hunter Biden investigation.

25 Q. Did they refer to the laptop in particular

1     **that had been the subject of the news stories?**

2           A.    I can't recall.

3           **Q.    And what did Ms. Dehmlow respond?**

4           A.    She said no comment.  She said something  
5   to the effect that the FBI has no comment on this.

6           **Q.    Did she indicate why the FBI declined to**  
7   **comment?**

8           A.    Yes.  It was because -- at the time I do  
9   not believe that we had confirmed that it was an  
10   active -- we had -- at the time we had not  
11   confirmed that the FBI was actually investigating  
12   Hunter Biden.  So she did not have the authority to  
13   say anything or to comment about it.

14          **Q.    Did she know at the time that the FBI had**  
15   **the laptop and that the contents had not been**  
16   **hacked?**

17                 MR. SUR:  Objection; calls for speculation  
18   and gets into law enforcement privilege.

19          **Q.    BY MR. SAUER:  To your knowledge?**

20          A.    I have no idea.  I never asked her, and  
21   she never told me.

22          **Q.    Did Hunter Biden come up with any other**  
23   **social media platforms during 2020?**

24          A.    Not to my knowledge.

25          **Q.    Do you recall any mention of Hunter Biden**

1 at any meetings with any social media platforms?

2 A. No. It stood out because that Facebook  
3 meeting was the only one where an individual from  
4 one of the companies even asked about it.

5 Q. You're confident that Hunter Biden did not  
6 come up at any other meetings between federal  
7 government officials and social media platforms in  
8 2020?

9 A. I was confident that I was not a party to  
10 any meeting with social media companies where  
11 Hunter Biden was discussed outside of the one  
12 incident that I told you about.

13 Q. That was the one where it was a FITE  
14 Facebook meeting where the analyst asked  
15 Ms. Dehmlow and she refused to comment, correct?

16 A. That is correct. That is correct.

17 MR. SAUER: I am going to show you a new  
18 exhibit, Exhibit 8.

19 Counsel, I just emailed it to you, too. I  
20 will put it up on screen share, and it will be  
21 familiar to you.

22 (Reporter marked Exhibit No. 8 for  
23 identification.)

24 Q. BY MR. SAUER: Do you see this document  
25 here?



1 A. It says the "Declaration of Yoel Roth."

2 **Q. Do you know Yoel Roth?**

3 A. Yes. I mentioned to you -- mentioned him  
4 to you previously. He was the head of site  
5 integrity at Twitter.

6 **Q. And it says that's a trust and safety  
7 department, correct?**

8 A. Well, it says it is a site integrity team  
9 which assesses content posted to Twitter to  
10 determine whether it violates the company's  
11 policies. So in general, that would be construed  
12 as a trust and safety role.

13 **Q. So in other words, he is -- has  
14 responsibility for content modulation at Twitter,  
15 or he at least did at the time of this declaration?**

16 A. Yes, I believe so.

17 **Q. In fact, your committee worked with him in  
18 that role, which he had until very, very recently,  
19 right? Just a couple weeks ago, right?**

20 A. Until the day after the election.

21 **Q. I am going to direct your attention to  
22 Paragraph 10 in this declaration. You see where it  
23 says in Paragraph 10, "Since 2018, I have had  
24 regular meetings with the" ODNI, "the Department of  
25 Homeland Security, the FBI and industry peers**

1 **regarding election security"? Do you see that?**

2 A. Yeah, Paragraph 11?

3 **Q. Paragraph 10.**

4 A. I'm sorry, Paragraph 10. Yes, I see that.

5 **Q. Do you know what regular meetings he's**  
6 **referring to in that paragraph? Is that the**  
7 **CISA-organized USG-industry meetings or is there**  
8 **other meetings as well?**

9 A. I am not sure, but from my interpretation  
10 of this document, it would be in the context of the  
11 CISA-hosted USG-industry meeting. Because I never  
12 hosted a meeting with those U.S. government  
13 components.

14 **Q. So let me ask you this: Are you aware of**  
15 **any meetings involving Twitter with ODNI, DHS and**  
16 **the FBI and other social media platforms?**

17 A. Only in the context of the CISA-hosted  
18 USG-industry meetings.

19 **Q. So the only meetings that you're aware of**  
20 **that this Paragraph 10 could be referring to are**  
21 **those USG-industry meetings that we have been**  
22 **talking about organized by CISA?**

23 A. That is my belief.

24 **Q. Paragraph 11, "During these weekly**  
25 **meetings, the federal law enforcement agencies**

1     communicated that they expected 'hack-and-leak  
2     operations' by state actors might occur in the  
3     period shortly before the 2020 presidential  
4     election, likely in October." Do you see that?

5           A.     Yes.

6           Q.     Is that consistent with your recollection  
7     that the communications at the 2020 USG-industry  
8     meetings organized by CISA, that state actors, I  
9     take it he means foreign governments, might  
10    perpetrate hack-and-leak operations in a period  
11    shortly before the 2020 presidential election?

12          A.     Yeah, so the weekly meetings would have  
13    occurred like very shortly before. Like we did  
14    not switch to a weekly cadence until maybe six  
15    weeks from the election, around then, maybe six or  
16    eight weeks. It was a very short weekly meeting.

17                 I do believe -- as I mentioned previously,  
18    I don't remember who. I do remember myself  
19    mentioning a concern for that, but it was mentioned  
20    that there was the potential for hack-and-leak  
21    operations.

22          Q.     And so that first sentence you agree with  
23    basically that people did say that to Twitter in  
24    these meetings, that foreign state actors might do  
25    a hack-and-leak operation in the period shortly

1 **before the 2020 presidential election; is that fair**  
2 **to say?**

3 A. Yes. During the CISA USG-industry  
4 meetings.

5 Q. You're saying those obtained a weekly  
6 cadence in the six to eight weeks before that  
7 actual election in 2020?

8 A. Yes.

9 Q. Okay. In those meetings, I take it likely  
10 in October, was that relayed to Twitter and the  
11 other industry participants?

12 A. I can't remember specifically, but it  
13 would have made sense for the meetings to  
14 definitely have occurred on a weekly basis in  
15 October ahead of the elections in November.

16 Q. And did the federal officials in those  
17 meetings convey that they expected that  
18 hack-and-leak operations might occur shortly before  
19 the election, likely in October?

20 A. So I wouldn't have used the word  
21 "expected." I would have used the word "concern"  
22 about potential hack-and-leak operations. The  
23 reason I say that is because we were not aware of  
24 any hack-and-leak operations that were pending.

25 Q. Okay. He goes on to say in the next --

1 let me ask you this: Did you express that concern  
2 would be, quote, likely in October?

3 A. I would say possible in October.

4 Q. He refers to the federal law enforcement  
5 agencies, plural, in that sentence. Do you see  
6 that?

7 A. Yes.

8 Q. And other federal law enforcement agencies  
9 other than the FBI also convey an expectation or  
10 concern that Russian hack-and-leak operations would  
11 occur shortly before the 2020 election?

12 A. Not to my -- not to my knowledge.

13 Q. So the only agency you recall conveying  
14 that information is the FBI?

15 A. The only federal law enforcement agency I  
16 remember conveying our concern was the FBI.

17 Q. How about any other agency?

18 A. As I mentioned, I believe CISA would have  
19 had the same concern as the FBI.

20 Q. And that was relayed through Mr. Masterson  
21 and Mr. Scully, I think you said, correct?

22 A. Correct.

23 Q. Any other agencies or federal officials  
24 raise those concerns other than you, Ms. Dehmlow,  
25 Mr. Masterson and Mr. Scully?

1           A.    I believe that the senior election  
2           official from ODNI would also have flagged that as  
3           a concern.  Because that was a concern across the  
4           entire U.S. government.

5           **Q.    Who is that?**

6           A.    At the time the senior election official  
7           was Shelby Pierson.

8           **Q.    What did Mr. -- is that Mr. or Ms.?**

9           A.    Ms., Ms. Pierson.

10          **Q.    What did Ms. Pierson say about that**  
11          **concern for the social media platforms in these**  
12          **meetings?**

13          A.    I don't recall what she exactly said, but  
14          the sentiment would have been similar to what I  
15          already conveyed, which is that I was concerned  
16          about the potential for hack-and-leak operations.  
17          However, we were not aware of any pending  
18          hack-and-leak operations.  I believe she would have  
19          shared the same sentiment.

20          **Q.    Do you remember anything specific about**  
21          **what she said?**

22          A.    I don't.

23          **Q.    Mr. Roth in the affidavit goes on to say,**  
24          **"I was told in these meetings that the intelligence**  
25          **community expected that individuals associated with**

1 political campaigns would be subject to hacking  
2 attacks and that material obtained through those  
3 hacking attacks would likely be disseminated over  
4 social media platforms, including Twitter." Do you  
5 see that?

6 A. Yes.

7 Q. Do you remember that occurring, that --  
8 people in the intelligence community relaying that  
9 they expected attacks on individuals associated  
10 with political campaigns and that the material  
11 obtained would be disseminated over Twitter?

12 A. So my recollection is different from  
13 Mr. Roth's. Not that the intelligence community  
14 expected that individuals associated with political  
15 campaigns would be subject to hacking attacks, but  
16 that there was the potential for individuals  
17 associated with political campaigns.

18 The reason I say that is because I and the  
19 individuals I work with at FITF, we were not aware  
20 of any successful hacks into any political  
21 organizations or campaigns at the same time of  
22 these meetings.

23 Q. How about in the intelligence community?  
24 You know, I take it that may refer to ODNI --

25 A. Yeah.

1           **Q.    -- is Mr. Roth accurately describing what**  
2           **they said in these meetings?**

3           MR. SUR:  Objection; calls for  
4           speculation.

5           THE WITNESS:  Yeah, I don't know what  
6           Mr. Roth meant or meant, but what I'm letting you  
7           know is that from my recollection -- I don't  
8           believe we would have worded it so strongly to say  
9           that we expected there to be hacks.  I would have  
10          worded it to say that there was the potential for  
11          hacks, and I believe that is how anyone from our  
12          side would have framed the comment.

13          And the reason I believe that is because I  
14          and the FBI, for that matter the U.S. intelligence  
15          community, was not aware of any successful hacks  
16          against political organizations or political  
17          campaigns.

18          **Q.    BY MR. SAUER:  You don't think that**  
19          **intelligence officials described it in the way that**  
20          **Mr. Roth does here in this sentence in the**  
21          **affidavit?**

22          A.    Yeah, I would not have -- I do not believe  
23          that the intelligence community would have expected  
24          it.  I said that they would have been concerned  
25          about the potential for it.



1           **Q.    How about the second half of the sentence**  
2           **here where he says that he was told in these**  
3           **meetings that material obtained through those**  
4           **foreign hacking attacks would likely be**  
5           **disseminated over social media platforms, including**  
6           **Twitter, do you recall that being discussed in the**  
7           **meetings?**

8           A.    Yeah, so if you're going to break it up  
9           into two parts like that, if there were a  
10          successful hack, that is what the intelligence  
11          community and I both think would happen.

12          **Q.    Did you relay that to them, that if there**  
13          **were a successful hack, they would likely relay the**  
14          **hacked materials over social media platforms**  
15          **including Twitter?**

16          A.    I don't remember if I relayed that, but I  
17          do agree with Mr. Roth's statement, that if there  
18          was a hack, that that would be a method to  
19          disseminate the information.

20          **Q.    And that particular concern was relayed to**  
21          **social media platforms in these meetings?**

22          A.    Yes, you are correct.

23          **Q.    He goes on to say, "These expectations of**  
24          **these hack-and-leak operations were discussed**  
25          **throughout 2020." Do you see that?**

1           A.     Yes.

2           **Q.     What -- was that, in fact, true that all**  
3           **throughout 2020 there were discussions of these**  
4           **concerns about hack-and-leak operations?**

5           A.     So I would not have used the word  
6           "expectation." As I characterized it to you  
7           before, we regularly discuss the potential for  
8           nation state actors to conduct hack-and-leak  
9           operations. And we provided briefings on the  
10          specific nation state actors that we believe who  
11          were potentially capable of conducting these types  
12          of operations.

13          **Q.     That would include Russia, I presume?**

14          A.     Yes.

15          **Q.     And you -- so in the briefings you**  
16          **provided to them, you brief them on your**  
17          **understanding that Russia was capable of conducting**  
18          **those hack-and-leak operations?**

19          A.     Yes.

20          **Q.     Do you brief them on your concerns that**  
21          **those might occur in the 2020 election cycle in**  
22          **connection with those briefings as well, correct?**

23          A.     Yeah, from my recollection, "might" is a  
24          more appropriate word than "expected."

25          **Q.     So you feel like you said "might," and**

1 **Mr. Roth feels like he was told they were**  
2 **"expected"; is that fair to say?**

3 A. Well, he wrote that -- well, in this  
4 deposition he provided, he said "expected," but I  
5 don't remember the language being so strong from --  
6 from me or from any FBI officials.

7 Q. I want to direct your sentence to the next  
8 page -- sentence. He says, "I also learned in  
9 these meetings that there were rumors" of a  
10 hack-and-leak -- "that a hack-and-leak operation  
11 would involve Hunter Biden," right, you see that?

12 A. Yes.

13 Q. Do you remember -- what's he referring to  
14 there, to your recollection?

15 A. So from my recollection, the social media  
16 companies, who include Twitter, would regularly ask  
17 us, "Hey, what kind of content do you think the  
18 nation state actors, the Russians would post," and  
19 then they would provide examples. Like, "Would it  
20 be X" or "Would it be Y" or "Would it be Z." And  
21 then we -- I and then the other FBI officials would  
22 say, "We believe that the Russians will take  
23 advantage of any hot-button issue."

24 And we -- I do not remember us  
25 specifically saying "Hunter Biden" in any meeting

1 with Twitter.

2 Q. Mr. Roth says in his sworn declaration he  
3 learned in these meetings, and I take it we are  
4 still talking about these weekly meetings, USG  
5 industry CISA-organized meetings, he learned in  
6 these meetings that there were rumors that a  
7 hack-and-leak operation would involve Hunter Biden,  
8 right? That's what he said in his sworn  
9 declaration, right?

10 A. Yes, I see that's what he said.

11 Q. And do you have any reason to doubt the  
12 veracity of what he said?

13 A. I would interpret what he said  
14 differently.

15 Q. How would you interpret what he said when  
16 he says he learned that there were rumors that a  
17 hack-and-leak operation would involve Hunter Biden?  
18 What do you think he's referring to?

19 MR. SUR: Objection; calls for  
20 speculation.

21 THE WITNESS: Yeah, in my estimation, we  
22 never discussed Hunter Biden specifically with  
23 Twitter. And so the way I read that is that there  
24 are hack-and-leak operations, and then at the  
25 time -- at the time I believe he flagged one of the

1 potential current events that were happening ahead  
2 of the elections.

3 **Q. BY MR. SAUER: You believe that he, Yoel**  
4 **Roth, flagged Hunter Biden in one of these**  
5 **meetings?**

6 A. No. I believe -- I don't believe he  
7 flagged it during one of the meetings. I just  
8 think that -- so I don't know. I cannot read his  
9 mind, but my assessment is because I don't remember  
10 discussing Hunter Biden at any of the meetings with  
11 Twitter, that we didn't discuss it.

12 So this would have been something that he  
13 would have just thought of as a hot-button issue on  
14 his own that happened in October.

15 **Q. So you think that where he says he learned**  
16 **in the meetings that there were rumors that a**  
17 **hack-and-leak operation would involve Hunter Biden,**  
18 **you don't recall any basis for that actually being**  
19 **discussed in the meetings?**

20 A. That is correct.

21 **Q. Paragraph 12 goes on to say that "On**  
22 **October 14, 2020, I learned from media coverage**  
23 **that the New York Post had posted the articles to**  
24 **its website that morning containing emails and**  
25 **other personal materials found on a hard drive that**

1 allegedly belonged to Hunter Biden." Do you see  
2 that?

3 A. Yes, Paragraph 12.

4 Q. There's that reference to those articles  
5 that you referred to earlier, correct?

6 A. Correct.

7 Q. It's your testimony that those news  
8 articles are the first time that you became aware  
9 that -- you became aware of Hunter Biden's laptop  
10 in any connection?

11 A. Yes. I don't remember if it was a New  
12 York Post article or if it was another media  
13 outlet, but it was on multiple media outlets, and I  
14 can't remember which article I read.

15 Q. And before that day, October 14th, 2020,  
16 were you aware -- were you aware of Hunter Biden --  
17 had anyone ever mentioned Hunter Biden's laptop to  
18 you?

19 A. No.

20 Q. The next paragraph Mr. Roth says, "The  
21 site integrity team preliminarily determined that  
22 the information in the articles," the New York Post  
23 articles, "could have been obtained through  
24 hacking, based on, among other things, the type of  
25 material, the sourcing described in the articles,

1 and the information security community's initial  
2 reactions." Do you see that?

3 A. Yes.

4 Q. Do you know what he's referring to in that  
5 last bit where he talks about the information  
6 security community's initial reactions?

7 MR. SUR: Objection; calls for  
8 speculation.

9 THE WITNESS: I do not know.

10 Q. BY MR. SAUER: Do you know -- what is the  
11 information security community?

12 A. So I don't know specifically that  
13 reference that he's using, but there is -- you  
14 know, I -- my assessment is that he's talking  
15 broadly about the American information security  
16 industry, but I don't know.

17 Q. Does that include the FBI?

18 MR. SUR: Objection; calls for  
19 speculation.

20 THE WITNESS: So I don't know. However, I  
21 do not believe that involves the FBI. To me when I  
22 read that, this is the first time I am reading that  
23 paragraph, it sounds like he is talking about the  
24 private sector information security community.

25 Q. BY MR. SAUER: He goes on to talk about

1 how Twitter ended up essentially blocking the  
2 articles from being shared on its platform and  
3 suspending the New York Post's Twitter accounts.

4 Generally without getting into the  
5 details, are you generally familiar with the fact  
6 that Twitter took steps to reduce the distribution  
7 of the Hunter Biden laptop story on its platforms?

8 A. Yeah, yeah, the extent of the information  
9 that I learned was exactly what you just described.  
10 I have no other knowledge of that.

11 Q. Okay. So right here at Paragraph 17 he  
12 says, "The Site Integrity Team blocked Twitter  
13 users from sharing links over Twitter to the  
14 applicable New York Post articles and prevented  
15 users who had previously sent tweets sharing those  
16 articles from sending new tweets until they deleted  
17 the tweets violating Twitter's policies," correct?

18 A. So that is what he wrote, but I am not  
19 aware of the specific details of the actions that  
20 they took until you just read that paragraph to me  
21 today.

22 Q. Do you know if anyone at Twitter reached  
23 out to anyone at the FBI to check or verify  
24 anything about the Hunter Biden story?

25 A. I am not aware of any communications



1 between Yoel Roth and the FBI about this topic.

2 **Q. Are you aware of any communications**  
3 **between anyone at Twitter and anyone in the federal**  
4 **government about the decision to suppress content**  
5 **relating to the Hunter Biden laptop story once the**  
6 **story had broken?**

7 MR. SUR: Objection; lacks foundation.

8 THE WITNESS: I am not aware of Mr. Roth's  
9 discussions with any other federal agency. As I  
10 mentioned, I am not aware of any discussions with  
11 any FBI employees about this topic as well. But I  
12 only know who I know. So I don't -- he may have  
13 had these conversations, but I was not aware of it.

14 **Q. BY MR. SAUER: You mentioned Mr. Roth.**  
15 **How about anyone else at Twitter, did anyone else**  
16 **at Twitter reach out, to your knowledge, to anyone**  
17 **else in the federal government?**

18 A. So I can only answer for the FBI. To my  
19 knowledge, I am not aware of any Twitter employee  
20 reaching out to any FBI employee regarding this  
21 topic.

22 **Q. How about Facebook, other than that**  
23 **meeting you referred to where an analyst asked the**  
24 **FBI to comment on the Hunter Biden investigation,**  
25 **are you aware of any communications between anyone**

1 at Facebook and anyone at the FBI related to the  
2 Hunter Biden laptop story?

3 A. No.

4 Q. How about any other social media platform?

5 A. No.

6 Q. How about Apple or Microsoft?

7 A. No.

8 MR. SUR: Counselor, if you have concluded  
9 with this exhibit, may I ask or may I suggest that  
10 a break would be appropriate? We have been in this  
11 session now I think for an hour and eight minutes.

12 MR. SAUER: I'm okay with that. Want to  
13 go off the record?

14 THE VIDEOGRAPHER: Off the record at 3:43  
15 p.m.

16 (Whereupon a recess was taken.)

17 THE VIDEOGRAPHER: Back on the record at  
18 3:57 p.m.

19 Q. BY MR. SAUER: Do you know Peter Strzok,  
20 S-t-r-z-o-k?

21 A. Yes, I do.

22 Q. How do you know him?

23 A. I know that he was a deputy assistant  
24 director at counterintelligence division, and the  
25 capacity that I worked with him in was related to

1 the Yahoo! hack, which also occurred in 2016, and  
2 our office did the investigation for that hack.

3 **Q. What was the Yahoo! hack?**

4 A. At the time the Yahoo! hack was the  
5 largest data breach in American history where 500  
6 million Yahoo! users' credentials were stolen by  
7 Russian intelligence service officers.

8 **Q. You worked on that investigation with**  
9 **Peter Strzok?**

10 A. So I oversaw the squad that ran the  
11 investigation. So I oversaw the investigation.  
12 Mr. Strzok consulted with me because he was  
13 concerned -- he had counterintelligence concerns  
14 about the investigation.

15 **Q. What were those concerns generally**  
16 **speaking? I am not going to ask specifics.**

17 A. Broadly speaking, U.S. government  
18 employees, U.S. current government employees as  
19 well as other government officials had used Yahoo!  
20 and still use Yahoo!, and he was concerned that  
21 Russian intelligence officers would be able to  
22 figure out the personal Yahoo! -- Yahoo! and AOL  
23 accounts for current and former U.S. government  
24 officials.

25 **Q. Did you have multiple interactions with**

1 **him during the course of that investigation?**

2 A. I would say regular -- like maybe once a  
3 month maybe.

4 **Q. Over the course of how long?**

5 A. Over the course of about six months.

6 **Q. Would these be phone calls or did you have  
7 any in-person meetings with him?**

8 A. These would be via classified Skype or  
9 Link, if you're familiar with that Microsoft  
10 product.

11 **Q. So they'd be videoconferences that were in  
12 a secured link?**

13 A. They would be voice conference -- there  
14 was video capability, but the FBI culture is not to  
15 use videoconference.

16 **Q. Have you talked to him since then?**

17 A. I have not. Yeah, I only spoke to him in  
18 the context of the Yahoo! investigation. So -- and  
19 he was interested, you know, in the extent of the  
20 damage, you know, like our intrusion investigation  
21 to determine if we could tell if Russians were  
22 aware which accounts belong to which U.S.  
23 government officials.

24 **Q. These interactions with him occurred in  
25 the year 2016; is that right?**

1           A.     Yeah, I would say spanning between 2015 to  
2     2016.

3           **Q.     So this would have been the same time**  
4     **frame that he's involved in the Crossfire Hurricane**  
5     **investigation?**

6           A.     I do not know when that investigation took  
7     place exactly, but I would say that I had  
8     engagement with him in the late 2015 to early 2016  
9     time frame.

10          **Q.     Do you know anyone associated with the**  
11     **Crossfire Hurricane investigation?**

12          A.     No, not to my knowledge.

13          **Q.     How about Lisa Page?**

14          A.     So Lisa Page is an attorney, an FBI  
15     attorney for the Office of General Counsel. She  
16     was on many of the calls. I don't know if she was  
17     on all of the calls, but she was on at least some  
18     of the, like, once-a-month calls that I had with  
19     Mr. Strzok.

20          **Q.     She was on -- so you would talk to**  
21     **Mr. Strzok and Ms. Page at the same time as the**  
22     **Yahoo! investigation?**

23          A.     Yes. My understanding was that she was --  
24     I don't know this for a fact, but my understanding  
25     was that she was a senior attorney in the

1 counterintelligence division and that she would be  
2 privy to the types -- she would need to know about  
3 the types of communications I had with Mr. Strzok  
4 about the extent of the damage.

5 **Q. Did you have any communications with**  
6 **Ms. Page after 2016?**

7 A. Yes, but not while she was working at the  
8 FBI.

9 **Q. What communications were those?**

10 A. She currently works for a private sector  
11 company, and I have regular communications focused  
12 on cybersecurity matters with her current company.

13 **Q. What company is that?**

14 A. The company is Twilio.

15 **Q. And you know her now and communicate with**  
16 **her in her work at Twilio?**

17 A. Yes.

18 **Q. And do those communications relate to**  
19 **hacking?**

20 A. Cybersecurity in general and potential  
21 hacks against the Twilio platform.

22 **Q. Have you communicated with her recently?**

23 MR. SUR: Objection; vague.

24 THE WITNESS: I would say the last time I  
25 communicated with her was maybe -- I can't recall

1 exactly, but maybe two months ago.

2 Q. BY MR. SAUER: How often do you talk to  
3 her?

4 A. Maybe on a quarterly basis.

5 Q. Have you ever discussed with Mr. Strzok or  
6 Ms. Page the prospect of a Russian hack-and-leak  
7 operation?

8 A. No. The only investigation that I ever  
9 discussed with either of them was the Yahoo! hack  
10 investigation.

11 Q. Do you know anyone else associated with  
12 the Crossfire Hurricane investigation?

13 A. No. But I do want to add during those  
14 meetings that I had with Mr. Strzok, Mr. Jim Baker,  
15 who was our general counsel at the time, would  
16 attend some of those meetings as well.

17 Q. Mr. Baker would attend those meetings that  
18 you had with Mr. Strzok about the Yahoo! hack?

19 A. Yes. At least some of them.

20 Q. Who else would attend those meetings?

21 A. Just the three of them. It would be the  
22 three of them getting a status update from -- they  
23 would be getting a case update from me.

24 Q. A case update about the Yahoo!  
25 investigation?

1 A. Correct.

2 Q. Did you ever discuss any hacking issues  
3 with Mr. Baker?

4 A. Not outside the context of the Yahoo!  
5 hack.

6 Q. Do you believe that Russian  
7 malign-foreign-influence activities affected the  
8 outcome of the 2016 presidential election?

9 MR. SUR: Objection; calls for  
10 speculation.

11 THE WITNESS: Quite honestly, I don't know  
12 if they had an impact.

13 Q. BY MR. SAUER: In your thesis you talk  
14 about how -- I think on multiple occasions you talk  
15 about how that election was decided by about 78,000  
16 votes in three key swing states; is that right?

17 A. That is correct. So I wanted to highlight  
18 that there was the potential, but unfortunately if  
19 you read my thesis, I could not conclus -- I could  
20 not conclusively say whether it had an impact, but  
21 it potentially could have an impact.

22 Q. So your thesis was -- the conclusion was  
23 that potentially Russian malign-foreign-influence  
24 operations may have affected the 2016 presidential  
25 election?



1           A.    Yes, but that we would never know  
2 conclusively.

3           **Q.    I think you also cited statistics**  
4 **suggesting that something like 59 percent of all**  
5 **Facebook users had been reached by Russian malign**  
6 **social media content during that election cycle?**

7           A.    Yeah, I cited that from one of the  
8 reports, that is correct.

9           MR. SAUER: I am going to show you a new  
10 exhibit. Just give me a second to email it to your  
11 counsel.

12                         (Reporter marked Exhibit No. 9 for  
13                                 identification.)

14           **Q.    BY MR. SAUER: Can you see this exhibit**  
15 **that I have labeled Exhibit 9 that I posted on the**  
16 **screen share?**

17           A.    I see it on there, but I don't see it on  
18 counsel's iPad yet.

19           **Q.    Just as a preliminary matter, you see that**  
20 **it is dated October 28, 2020, and it states, "Tech**  
21 **CEOs Senate Testimony Transcript October 28"?**

22           A.    Yes, I see that.

23           **Q.    And you refer in your thesis to the fact**  
24 **that tech CEOs were called in to testify before**  
25 **Congress shortly before the 2020 election, correct?**

1           A.    Yes, correct.

2           **Q.    I think you refer to this as one of the**  
3           **instances where pressure was put on them to take**  
4           **more aggressive action to -- to keep malign foreign**  
5           **influence off their platforms, right?**

6           A.    Yes, that was my assessment.

7           MR. SAUER:  I am going to jump ahead to  
8           Page 56 of this document.  So Indraneel, I don't  
9           know if you're following in the PDF.

10          MR. SUR:  It hasn't arrived yet,  
11          unfortunately.

12          **Q.    BY MR. SAUER:  If you look here at Page**  
13          **56, there's a question posed to Mark Zuckerberg who**  
14          **is the CEO of Meta or Facebook, correct?**

15          A.    Can you highlight the question that you  
16          want me to look at?

17          **Q.    I actually -- probably just look at what**  
18          **he said.  I don't think the question is that**  
19          **relevant.**

20          MR. SUR:  If I may interrupt, the email  
21          just arrived, so we'll have it on the screen in a  
22          few seconds here.

23          MR. SAUER:  Great.

24          **Q.    Can you see there --**

25          MR. SUR:  May I ask which page?

1 MR. SAUER: Page 56 of the PDF.

2 Q. Do you see there in the middle of the page  
3 it indicates that Mark Zuckerberg is the one  
4 speaking?

5 A. I see that at 2:34:35.

6 Q. That's the place. Thanks. In that answer  
7 he says along the lines of what you mentioned  
8 earlier, "one of the threats the FBI has alerted  
9 our companies and the public to, was the  
10 possibility of a hack and leak operation in the  
11 days or weeks leading up to this election,"  
12 correct?

13 A. Yeah, I am reading that.

14 Q. Okay. And then Mr. Zuckerberg went on to  
15 say, "So you had both the public testimony from the  
16 FBI and in private meetings alerts that were given  
17 to at least our company, I assume the others as  
18 well, that suggested that we be on high alert and  
19 sensitivity that if a trove of documents appeared  
20 that we should view that with suspicion, that it  
21 might be part of a foreign manipulation attempt."  
22 Do you see that?

23 A. I do see that.

24 Q. This testimony is occurring two weeks  
25 after the Hunter Biden stories in the New York

1 **Post, correct, October 28, 2020?**

2 A. Yes, that's what it was dated.

3 **Q. Okay. Let's go through his account there.**  
4 **Mr. Zuckerberg said "one of the threats that the**  
5 **FBI has alerted our companies and the public to,**  
6 **was the possibility of a hack-and-leak operations**  
7 **in the days" and/"or weeks leading up to this**  
8 **election," correct?**

9 A. Correct.

10 **Q. Yeah, and he says the FBI has alerted the**  
11 **public to that. Do you recall the FBI doing so?**

12 A. I believe that we much more frequently  
13 than in the 2016 context -- context, "we," meaning  
14 the FBI and CISA, would put out advisories about  
15 concerns that we had about the elections. These  
16 would be public advisories.

17 **Q. Would these include public advisories**  
18 **saying there might be a hack-and-leak operation**  
19 **shortly before the 2020 election?**

20 A. I can't recollect. I know there are  
21 public advisories, and if you show them to me I  
22 would be able to read them and refresh my memory,  
23 but I don't recollect at this time.

24 **Q. Do you know whether such public advisories**  
25 **were made, as Mr. Zuckerberg says, relating to**

1 quote, the possibility of a hack-and-leak operation  
2 in the days or weeks leading up to this election?

3 A. I can't remember any specific advisories  
4 at this time.

5 Q. Were you involved in preparing public  
6 advisories?

7 A. No.

8 Q. Did you ever suggest that the FBI should  
9 issue a public advisory about a hack-and-leak  
10 operation?

11 A. No, not specifically. What I did tell our  
12 cyber intelligence section was that we, the FBI,  
13 should try to be as transparent as possible ahead  
14 of the 2020 elections.

15 Q. In the next sentence Mr. Zuckerberg says,  
16 "So you had both the public testimony from the FBI  
17 and in private meetings alerts that were given to  
18 at least our company, I assume the others as well,  
19 that suggested we be on high alert and  
20 sensitivity." Do you see that?

21 A. Yes, I see that statement.

22 Q. So do you know what he's referring to  
23 about the public testimony from the FBI?

24 MR. SUR: Objection; calls for  
25 speculation.

1 THE WITNESS: I don't know about the  
2 public testimony. I could assume it is from  
3 direct -- the director, Christopher Wray, or  
4 another senior official, but I am not aware of what  
5 testimony he's talking about.

6 Q. BY MR. SAUER: How about "in private  
7 meetings alerts that were given to at least our  
8 company, I assume others as well," do you know what  
9 private meetings alerts he's referring to?

10 MR. SUR: Objection; calls for  
11 speculation.

12 THE WITNESS: I don't know what private  
13 meetings he meant, but as I've discussed with you,  
14 I've hosted several meetings with Facebook ahead of  
15 the 2020 elections. So these may be these private  
16 meetings.

17 Q. BY MR. SAUER: You hosted several private  
18 meetings with Facebook where the concern about a  
19 hack-and-leak operation was raised?

20 A. Yes.

21 Q. Are you aware of any other private  
22 meetings between the FBI and Facebook?

23 A. I am not aware of any besides the ones  
24 I've hosted.

25 Q. Is it possible that others occurred that

1     **didn't involve you?**

2           A.     That is possible, but I am not aware of  
3     them.

4           **Q.     And he describes those private meetings**  
5     **alerts as "suggested that we be on high alert and**  
6     **sensitivity that if a trove of documents appeared**  
7     **that we should view that with suspicion, that it**  
8     **might be part of a foreign manipulation attempt."**  
9     **Do you see that?**

10          A.     Yes.

11          **Q.     Was that discussed in your alerts, that if**  
12     **a trove of documents appear, that that should be**  
13     **something viewed with suspicion?**

14          A.     I don't remember that exact framing of our  
15     discussions with them.

16          **Q.     Do you remember saying -- I know you**  
17     **talked about, "Hey, there could be another**  
18     **hack-and-leak operation." Do you remember saying**  
19     **something like "If you get a whole bunch of**  
20     **documents that suddenly appear, that's something**  
21     **that should be viewed with suspicion"?**

22          A.     No, I don't remember any of us saying  
23     that. I think -- I don't remember this for a fact,  
24     but I think what we would have said is we would  
25     have asked "If you receive a whole -- if you see a

1 trove of potentially hacked materials, what are you  
2 going to do about it?" Which would be our way of  
3 asking them how their terms of service would handle  
4 a situation like that.

5 **Q. Do you recall asking them how they would**  
6 **handle it if potentially hacked materials appeared,**  
7 **correct?**

8 A. Yes.

9 **Q. And what did they say?**

10 A. So I believe that they would describe what  
11 their policies were for validating the information  
12 and handling the information in general. I can't  
13 remember what specific company said exactly what,  
14 but in general, I remember the social media  
15 companies having terms-of-service policies to  
16 handle this sort of situation.

17 **Q. Which social media companies did you ask**  
18 **that of, Twitter, Facebook and YouTube?**

19 A. Yes, I believe we would have asked them  
20 that, but I can't recollect when that would have  
21 happened, but I believe we would have asked them  
22 that at some point.

23 **Q. So you would have cautioned them that**  
24 **there might be a hack-and-leak operation and ask**  
25 **them how their terms of service would address it,**



1     **fair to say?**

2           A.     That is fair to say.

3           **Q.     Okay.  You specifically asked them how**  
4     **their terms of service would address it?  You**  
5     **wanted to know whether and to what extent the**  
6     **material would be taken down or blocked if it**  
7     **appeared, correct?**

8           A.     Yeah, we wanted to know what actions they  
9     would take to include the two actions that you  
10    described.

11          **Q.     Why did you want to know that?  Why did**  
12    **you want to know whether or not the various social**  
13    **media platforms would take down hacked materials if**  
14    **they appeared?**

15          A.     So this is just my personal opinion about  
16    why we wanted to know was because I think  
17    internally we wanted to know what actions that we  
18    would need to take, whether we would need to take a  
19    legal remedy such as like a seizure warrant or  
20    something.  I can't ever recollect discussing this  
21    because it never came up.

22                 In my assessment, why I would be concerned  
23    was -- if there's hacked materials and they stay  
24    up, then -- and if the companies do not believe  
25    they violate their terms of service, what actions

1 could the FBI take.

2 So I mean, these are all hypotheticals.

3 **Q. And the idea would be the FBI could pursue**  
4 **a seizure warrant to have -- basically take -- take**  
5 **the materials down through legal process if the**  
6 **social media platforms wouldn't do it themselves?**

7 A. So that was one hypothetical solution.

8 **Q. And that was one that occurred to you?**

9 A. Yeah, that was one that occurred to me. I  
10 don't remember discussing it with anyone else.

11 **Q. The -- who -- who of the FBI asked them,**  
12 **the social media platforms, "How are your hacking**  
13 **materials policies addressing this?"**

14 A. I would say we take turns asking. When I  
15 say "we," I mean either myself or the members of  
16 the Foreign Influence Task Force I already  
17 mentioned to you. Wherever it seemed like an  
18 organic follow-up question, we would ask "How would  
19 your terms of service apply to this situation or  
20 that situation?" Just so that we would understand  
21 what types of actions that they would take.

22 **Q. I take it their answers would inform**  
23 **potential further actions by the FBI, such as**  
24 **potentially pursuing a seizure warrant to remove**  
25 **hacked materials?**

1           A.    I think we were -- we were dealing in  
2    hypotheticals, so there was no concrete plan.  In  
3    my mind, that would be one way to take down  
4    information.

5           And the reason I say that is because in a  
6    different situation where the FBI became aware of  
7    Iranian fake news sites, we did pursue a seizure  
8    warrant and got an IIFA/FARA-based search or  
9    seizure warrant to take down over 70 Iranian fake  
10   news websites.

11          **Q.    Did they take down hacked materials?**

12          A.    I don't know the specifics.  I oversaw the  
13   squad that executed the seizure warrant.

14          **Q.    Do you recall, did Ms. Dehmlow ever**  
15   **discuss what actions might be taken if there was a**  
16   **hack-and-leak operation before the 2020 election to**  
17   **take down materials?**

18          A.    No.

19          **Q.    Do you recall discussing that with the**  
20   **FBI -- or anyone at the FBI, that is if we knew**  
21   **there was a hack-and-leak operation, how do we get**  
22   **the materials down?**

23          MR. SUR:  Objection; calls for  
24   deliberative process privilege of internal  
25   discussions within the FBI.

1 THE WITNESS: Yeah, we did have internal  
2 discussions. As I mentioned, the only -- one of  
3 the solutions was potentially to see if we have  
4 enough probable cause to execute a seizure warrant.

5 Another solution was to ask the company to  
6 consensually take down the information even if it  
7 did not violate their terms of service. So those  
8 were the two hypothetical solutions that I  
9 remember.

10 Q. BY MR. SAUER: Right. That second  
11 hypothetical solution about asking them to take it  
12 down even if it didn't violate their terms of  
13 service, did you pursue that with respect to the  
14 Hunter Biden laptop story?

15 A. No.

16 Q. Did you contact any social media platforms  
17 and say, "Hey, can you take this stuff down because  
18 it looks hacked"?

19 A. No.

20 Q. When the social media platforms answer,  
21 did Facebook and Twitter indicate that they would  
22 remove hacked materials under their terms of  
23 service when you asked them?

24 A. From my recollection, I think both of  
25 those companies said that they would remove hacked

1 materials if they were able to validate that it was  
2 hacked. I don't remember -- I don't remember the  
3 qualifiers that they used to determine whether they  
4 were hacked materials or not.

5 **Q. When did they tell you that, roughly?**

6 A. I can't remember, but it was ahead of the  
7 2020 elections.

8 **Q. That would have been before that Hunter**  
9 **Biden laptop story broke?**

10 A. I don't remember. It would have been --  
11 it might have happened in October. It could have  
12 happened before. I think it may have happened  
13 before then, but I can't remember.

14 **Q. They made that representation to you, both**  
15 **Twitter and Facebook, in these FITF Facebook**  
16 **preelection meetings -- sorry. Let me rephrase**  
17 **that.**

18 **Did they make that representation to you**  
19 **in the FITF-organized meetings with Facebook and**  
20 **then Twitter?**

21 A. I can't remember the specifics, but  
22 generally speaking, the companies provided us with  
23 overview of what their terms of service was and how  
24 hacked materials could be categorized within these  
25 terms of service and then just the types of actions

1 that they would potentially take.

2 **Q. I think you said a minute ago that the**  
3 **kinds of actions they would potentially take**  
4 **included taking the materials down?**

5 A. Yeah, that was -- that was a potential  
6 action. I think it had to reach a -- you know, it  
7 had -- they had an internal validation process and  
8 it had to clear internal hurdles before they would  
9 take that certain type of content down. But I  
10 can't remember the specifics of what the internal  
11 hurdles were.

12 **Q. That information was conveyed to a group**  
13 **of FBI officials that had included you and**  
14 **Ms. Dehmow as well as Mr. Olson, Mr. Cone,**  
15 **Ms. Chock and Mr. Giannini?**

16 A. Yeah, I don't know if all of these people  
17 were present during any of those meetings where  
18 they were discussed, but in general, I would say  
19 that at least some subset of them would have been  
20 present.

21 **Q. Okay. And then did you guys relay that**  
22 **information to anyone, "Here's what Facebook and**  
23 **Twitter will do if they find and receive hacked**  
24 **materials on their platforms"?**

25 A. So I did not relay it to anyone else,

1 outside of my internal discussions with them. I do  
2 not know if they relayed it to anyone else.

3 **Q. Do you know -- you don't know if it was**  
4 **relayed to anyone else by anyone?**

5 A. I do not. I am only privy to what I  
6 discussed with them.

7 **Q. Do you remember anything else -- turning**  
8 **back to the screen share, and you see**  
9 **Mr. Zuckerberg's testimony, he talks about the**  
10 **information received "suggested that we be on high**  
11 **alert and sensitivity." Is that a fair**  
12 **characterization of the communications from the FBI**  
13 **to Facebook that you were involved in?**

14 A. So I would not have framed it like  
15 Mr. Zuckerberg did. As I mentioned, his language  
16 seems stronger than how I would have framed it, or  
17 how I believe FBI officials would have framed it.

18 We would have said something to the effect  
19 of "We are concerned about potential hack-and-leak  
20 operations ahead of the 2020 elections and that one  
21 of the methods that we would use is to disseminate  
22 the hacked materials on the social media  
23 platforms."

24 So I don't know if I -- we would have said  
25 that we should view that with suspicion. Instead

1 of "foreign manipulation attempt," I would have  
2 said "foreign malign influence."

3 Q. Did you, in fact, tell them that if a  
4 trove of document appears, it should be viewed with  
5 suspicion?

6 A. No. That's what I'm saying, is I don't  
7 think we would have said that language.

8 Q. Did you tell him that if a trove of  
9 documents appeared, it may be part of a foreign  
10 manipulation attempt?

11 A. I would -- we would not have used that  
12 language. As I said before, what we would have  
13 told them and what I recollect saying is that we --  
14 that I was concerned about a potential  
15 hack-and-leak operation, especially right before  
16 the election, and that one of the channels for  
17 disseminating that hacked information would be via  
18 the social media platforms.

19 Q. Do you know Timothy Thibault or Thibault,  
20 T-h-i-b-a-u-l-t?

21 (Discussion off the record.)

22 THE WITNESS: I am not familiar with that  
23 name.

24 Q. BY MR. SAUER: Do you know Brian Auten,  
25 A-u-t-e-n?



1           A.     Yes.  I believe he was a supervisory  
2 intelligence analyst in the -- in the special  
3 counsel's office.  That's how I know him.

4           **Q.     So he's an FBI official?**

5           A.     Yeah, he is supervisory intelligence  
6 analyst, I believe is his title.

7           **Q.     What's a supervisory intelligence analyst?**

8           A.     A frontline supervisor position for  
9 analysts within the FBI.

10          **Q.     Do you know -- how do you know him?**

11          A.     I only know him in passing because I  
12 have -- I had engaged with the special counsel's  
13 office -- specifically Robert Mueller's special  
14 counsel's office.  I know there are multiple  
15 special counsel's office, but specifically Robert  
16 Mueller's.  I believe that he was part of the  
17 special counsel's office team.

18          **Q.     What was your engagement with Robert  
19 Mueller's special counsel's office?**

20          A.     So as I previously mentioned, we -- my  
21 squad ran one of the investigations associated with  
22 the hack of the DNC in 2016.  The special counsel's  
23 office consolidated all investigations that had to  
24 do with any Russian interference in the 2016  
25 elections.  So we, specifically my squad and I, had

1 to hand off that portion of the investigation to  
2 the special counsel's office.

3 **Q. So they took over your investigation of**  
4 **the DNC hack?**

5 A. Yes, they took over that portion of the  
6 investigation.

7 **Q. What other portions were there?**

8 A. The other portion is the continuing active  
9 investigation against the individuals for our  
10 computer intrusions besides the 2016 DNC hack.

11 **Q. So it involves the same malign actors but**  
12 **not the same hacking attempt?**

13 A. Correct, yeah, that is a correct  
14 assessment.

15 MR. SAUER: I am going to email you and  
16 your counsel a set of new exhibits.

17 Indraneel, can you tell me when you get  
18 these?

19 MR. SUR: I will.

20 MR. SAUER: Has that email come yet?

21 MR. SUR: Still waiting.

22 MR. SAUER: While you're waiting, I am  
23 going to go ahead and share, just to keep things  
24 moving, Exhibit 13 with you.

25 (Reporter marked Exhibit No. 13 for

1 identification.)

2 Q. BY MR. SAUER: Do you see that now, sir,  
3 Exhibit 13?

4 A. Yeah, I see the title is "Audio  
5 Transcription of Recording in re: State of  
6 Missouri, et al., versus Joseph R. Biden, Junior."

7 Q. It goes on "File: FBI on Election-There's  
8 Going to be a Lot of Noise," right?

9 MR. SUR: I'm sorry, we still don't have  
10 the email. So is this Exhibit 13?

11 MR. SAUER: Yeah. We may have the court  
12 reporter make a transcription of his publicly  
13 record -- public interviews, the audio of his  
14 public interviews.

15 Q. So Mr. -- Agent Chan, on October 28, 2020,  
16 did you give an interview to someone called Tom  
17 Field relating to the upcoming election?

18 A. I believe I did. I give a lot of  
19 interviews, but yeah, I am looking at the  
20 transcript of this one. Tom Field is associated  
21 with a media outlet called ISMG.

22 Q. Interestingly the date of this is October  
23 28, 2020, the same date as the tech CEOs  
24 congressional testimony we just talked about,  
25 right?

1           A.     Okay.  Yeah, I didn't remember when the  
2     tech CEOs testified, but you have refreshed my  
3     memory.

4           **Q.     This would be less than a week before the**  
5     **October 2020 election, right?**

6           A.     Yes.

7           **Q.     And you told him there's going to be a lot**  
8     **of noise.  Do you know what you were talking about**  
9     **there?**

10          A.     Can you tell me what page you're on?

11          **Q.     That title "FBI on Election-There's Going**  
12     **to be a Lot of Noise," did you say that to him?**

13          A.     What line is that?  What page?

14          **Q.     I am highlighting it.  It is the all caps**  
15     **title on Lines 10 and 11 on Page 1, "FBI on**  
16     **Election-There's Going to be a Lot of Noise."**

17          A.     So I don't recall making that title.

18          **Q.     Do you remember making that statement,**  
19     **that there's going to be a lot of noise?**

20          A.     Is it in the transcript anywhere?

21          **Q.     I am just asking do you remember that?**

22          A.     I don't remember it.  That's why I'm  
23     asking if it is in the transcript anywhere.

24          **Q.     Fair enough.  If you don't remember, you**  
25     **don't remember.**

1 A. Yeah.

2 Q. Go down to Page 9 of the transcript,  
3 there's a paragraph here starting on Line 3 at Page  
4 9 where you say, "So I am going to ask -- I'm  
5 probably going to say the same thing that I said  
6 the last time, but if you see something, say  
7 something; right? So if you are seeing any types  
8 of cyber attacks against your companies, let your  
9 local FBI office know; right?"

10 A. Yes, I see that.

11 Q. Is that -- do you recall saying that to  
12 Tom Field?

13 A. I don't specifically remember, but it  
14 appears to be a transcript of an interview I had  
15 with him. That seems like something I would say.

16 Q. And then you go to say, "If you're seeing  
17 something related to the election on your social  
18 media platform, all of them have portals where you  
19 can report that sort of information," correct?

20 A. Yes.

21 Q. So there you are encouraging the listeners  
22 of the podcast if they see something inaccurate on  
23 their social media platform, to go and report it  
24 directly to the social media platform, correct?

25 A. That is correct.

1 Q. Then you go on to say, "They are being  
2 very aggressive in trying to take down any  
3 disinformation or misinformation," right?

4 A. Yes.

5 Q. And I take it the context here you're  
6 talking about disinformation and misinformation  
7 related to the election, right?

8 A. Yes.

9 Q. So you're encouraging the listeners of  
10 this podcast to report to social media companies  
11 any election-related speech that they see that they  
12 think is disinformation or misinformation so that  
13 the social media platforms can take it down, right?

14 A. So that the social media platforms can  
15 review it and determine if it violates their terms  
16 of service.

17 Q. And it was your view at that time that the  
18 social media platforms were being, quote, very  
19 aggressive in trying to take down any  
20 disinformation or misinformation relating to  
21 elections, right?

22 A. Yes.

23 Q. And you go on to say "if they see anything  
24 on election day or before election day, you can  
25 always report it to FBI.gov or justice.gov, and you

1 know, there's a little button you can click to  
2 submit a complaint," correct?

3 A. Yes.

4 Q. So you're encouraging the listeners to  
5 report any disinformation or misinformation to  
6 FBI.gov or justice.gov, correct?

7 A. That is correct.

8 Q. FBI.gov is the FBI's website, right?

9 A. Yes.

10 Q. Justice.gov, is that the Department of  
11 Justice's website?

12 A. That is correct.

13 Q. Federal Department of Justice, right?

14 A. Yes, the U.S. Department of Justice.

15 Q. What happens to disinformation complaints  
16 that get submitted to FBI.gov relating to election  
17 misinformation or disinformation?

18 A. I believe that all these tips are reviewed  
19 by an intake analyst, either an FBI employee or an  
20 FBI contractor. And then I believe they have  
21 certain levels of predication where they would keep  
22 sending it higher -- higher up the chain.

23 Q. What do you mean by certain levels of  
24 predication where they would keep sending you  
25 higher up the chain?

1           A.     So I would say if something is a vague  
2     threat about -- for example, a common type of  
3     threat is "I hate Politician X." And then someone  
4     sends in a complaint like "I believe this user  
5     wants to kill Politician X," but you know, what  
6     that person said was a vague statement with no  
7     threat in it.

8                     So that is a -- that is like one type of  
9     example. So in that situation, that type of  
10    complaint would be filed away.

11                    In another situation, for example, a  
12    threat-to-life situation, "I want to kill  
13    Politician X, and I know where he lives."

14                    So then that would be they would -- the  
15    analyst would try to figure out what field office  
16    does Politician X reside in and then forward that  
17    information to the appropriate field office to  
18    conduct an initial assessment.

19                    So that would be an example of how we  
20    would handle two types of complaints.

21           **Q.     Those are complaints about threats. In**  
22    **this context you're referring to disinformation and**  
23    **misinformation, correct?**

24           A.     Yes.

25           **Q.     So if somebody reports not a threat to a**



1 public official but a disinformation -- someone  
2 reports disinformation or misinformation on social  
3 media to FBI.gov, how would that be processed?

4 A. So that would also be reviewed by the  
5 analyst, and then it would be the same situation.

6 So if I can give you a hypothetical  
7 example, "Political Party A vote on Tuesday.  
8 Political party B vote on Wednesday." So if  
9 someone submitted something like that, that would  
10 probably be flagged. Like an analyst would say,  
11 "Oh, this is involving the time, place or manner of  
12 an actual election. I need to send this up to  
13 someone who is more authoritative that can review  
14 this information."

15 So they may actually kick this out to the  
16 field office depending on if they can figure out  
17 where the account holder is from.

18 Q. What if -- okay. So if that -- sorry, say  
19 it again. They send it out to the field office?

20 A. In this hypothetical situation, let's say  
21 a social media account user somehow identifies  
22 themselves as being from the state of Missouri, you  
23 know, like it is a handle. And then they say or  
24 they portray themselves as being from St. Louis,  
25 Missouri and they say, "If you are affiliated with

1 Party A, you vote on Tuesday. If you're affiliated  
2 with Party B, you vote on Wednesday."

3 So that information would be reviewed by  
4 the analyst that does the intake, and that would  
5 likely revolve -- result in a lead being sent to  
6 the St. Louis field office to work with the U.S.  
7 Attorney's Office to see if, you know, they should  
8 serve a subpoena to get the additional information  
9 or if it, you know, if it rises to the level of an  
10 election requirement.

11 **Q. Does the FBI also report -- does anyone on**  
12 **that chain in the FBI report it to the social media**  
13 **platform to be assessed under their**  
14 **content-modulation policies?**

15 A. So that would only -- that -- that type of  
16 process that I'm aware of only happened during the  
17 election command post that I mentioned to you  
18 previously.

19 **Q. So if somebody went to FBI.gov and said,**  
20 **"Hey, you know, someone's saying in Missouri**  
21 **Republicans vote on Tuesday, Democrats vote on**  
22 **Wednesday," that would be referred to the Missouri**  
23 **field office for an investigation?**

24 A. Yeah, that would be referred to the St.  
25 Louis field office for investigation. And then

1 like, the investigators in the St. Louis office  
2 along with the U.S. Attorney's Office would  
3 determine if that is something that should be sent  
4 to FBI headquarters. And then that would be sent  
5 to FBI headquarters and there would be an FBI OGC  
6 attorney as well as a DOJ public integrity attorney  
7 along with, you know, another FBI official. They  
8 would all look at it and say, "Yes, we believe that  
9 this should be sent to FBI San Francisco."

10 So by the time it's reached us, there's  
11 already been what I will characterize as an FBI  
12 headquarter stamp of approval.

13 **Q. And the FBI San Francisco then would relay**  
14 **those to social media platforms as you've discussed**  
15 **earlier --**

16 A. Yes.

17 **Q. -- in your testimony, correct?**

18 A. Yes, correct.

19 **Q. And there the idea is that the social**  
20 **media platforms will assess those in connection**  
21 **with their terms of service, assess them for**  
22 **compliance with their terms of service, correct?**

23 A. That is correct.

24 **Q. What if somebody posts something like**  
25 **"Voting by mail is unreliable, and your ballot**

1 **probably won't get there so don't vote that way"?**

2 MR. SUR: Objection; incomplete

3 hypothetical.

4 **Q. BY MR. SAUER: What would happen to a**  
5 **report like that to FBI.gov?**

6 A. So I think that would also be reviewed by  
7 the attorneys. When I mean "the attorneys," I mean  
8 specifically the FBI headquarters attorney as well  
9 as a DOJ public integrity attorney, and they will  
10 determine whether it will get sent to San Francisco  
11 or not.

12 **Q. And would something like that, in your**  
13 **experience, get sent to San Francisco?**

14 A. In my experience, something vague like  
15 that would not get sent to San Francisco.

16 **Q. How about something specific like "Voting**  
17 **by mail is rife with fraud and it involves tons of**  
18 **people cheating and therefore, it should be**  
19 **abolished," how about that?**

20 MR. SUR: Objection; hypothetical.

21 THE WITNESS: Honestly, I have never saw  
22 that type of complaint being submitted to us  
23 through the command post. As I mentioned to you  
24 previously, it was, from my recollection, time,  
25 place or manner disinformation or misinformation.

1           **Q. BY MR. SAUER: What do you remember**  
2           **specifically about those being referred to you?**  
3           **What kind of things do you remember specifically --**

4           A. The example I gave you where if you are  
5 registered with Party A, you vote on Tuesday; if  
6 you're registered with Party B, you vote on  
7 Wednesday. So that was a frequent one.

8                   Another one was, depending on what state,  
9 some states where it has to arrive at the polling  
10 location on election day, whereas other states  
11 allow it -- the ballot -- the mail-in ballot to be  
12 postmarked by election day. So I remember I would  
13 look, and I was like, "Oh, like, huh, I don't  
14 understand this one." And then maybe I would  
15 follow up with the field office and they say,  
16 "Elvis, in our state it has to arrive at the  
17 polling location by a certain date."

18                   So that would be the type of different  
19 information that we would provide to the social  
20 media companies.

21           **Q. And I take it you testified earlier that**  
22           **posting the wrong information about that, the date**  
23           **that your ballot has to arrive, is criminal on --**  
24           **in the government's view; is that right?**

25           A. It is a potential violation of federal

1 election laws.

2 **Q. What federal election statute does it**  
3 **violate?**

4 MR. SUR: Objection; calls for legal  
5 conclusion.

6 THE WITNESS: I am not an attorney, but  
7 you hear me saying the words "time, place or manner  
8 disinformation." So just based on my law  
9 enforcement training where the attorneys tell me  
10 that anything that is related to false information  
11 about the time, place or manner of an election or  
12 about the voting process, that that is a potential  
13 election crime.

14 **Q. BY MR. SAUER: You refer to the social**  
15 **media platforms being very aggressive in trying to**  
16 **take down any disinformation or misinformation.**  
17 **What were you talking about?**

18 A. I was saying in contrast to 2016 when they  
19 took no actions.

20 **Q. What did they do to be very aggressive?**

21 A. So as I mentioned to you previously, they  
22 developed technologies to be able to detect  
23 foreign-malign-influence operations, and they also  
24 add just their policies to be able to handle  
25 foreign-malign-influence operations.

1 MR. SAUER: I am going to show you Exhibit  
2 15. Indraneel, I sent you an email.

3 MR. SUR: Okay. 15.

4 (Reporter marked Exhibit No. 15 for  
5 identification.)

6 Q. BY MR. SAUER: Agent Chan, can you see  
7 this on the screen share?

8 A. Yes, the title "Preparing for Retaliatory  
9 Attacks from Russia."

10 Q. On June 29, 2022?

11 A. Yes.

12 Q. Again, this is a court reporter-created  
13 transcript of your podcast or interview with Anna  
14 Delaney on that date. Do you see that?

15 A. Yeah, on June 29th, 2022.

16 Q. Who is Anna Delaney?

17 A. She is now the -- now that I am looking at  
18 the transcript, she is a reporter with ISMG.

19 Q. Do you remember giving this interview last  
20 June?

21 A. I believe this was in the context of the  
22 RSA conference, but I can't remember specifically.

23 As I mentioned, I did a lot of public  
24 speaking, and I get interviewed frequently by media  
25 outlets.

1 Q. Going down to Page 8 of this transcript,  
2 starting on Page 7 you see that Ms. Delaney asks  
3 about the midterm elections 2022 and she asked you  
4 what the FBI is doing to prepare, right? "What's  
5 the FBI doing to prepare," you see that at the  
6 bottom of the page?

7 A. Okay. I see that question.

8 Q. And you respond to that, "The good news  
9 is, post 2020, we've never stopped," right?

10 A. Yes, I said that.

11 Q. You say that you were -- "As soon as  
12 November 3rd happened in 2020, we just pretty much  
13 rolled into preparing for 2022," correct?

14 A. Yes.

15 Q. And you say -- a little lower down you  
16 say, "From FBI San Francisco's standpoint, we are  
17 also really engaged with the technology companies  
18 out here and represented here at the RSA  
19 conference." There you go.

20 A. Yeah, so yeah, it was at the RSA  
21 conference.

22 Q. "So making sure that, you know, any  
23 vulnerabilities we think advanced persistent  
24 threats would be using" and so forth, right?

25 A. Yes.



1 Q. I think what you're talking about there is  
2 potential hacking attempts and working with the  
3 social media companies to defend against hacking  
4 attempts; is that right?

5 A. I wouldn't say because I mention  
6 technology companies, against all types of  
7 companies, even non-social media companies.

8 Q. Got you. You say, "We're also working  
9 with the social media companies to make sure that  
10 any foreign disinformation that's coming out that,  
11 you know, like, if we can identify them, we can  
12 share that information with them so they can knock  
13 down accounts, knock down disinformation content,"  
14 correct?

15 A. Yes, I said that.

16 Q. And do you agree with that statement, that  
17 you were working with social media companies in the  
18 2022 election cycle to make sure that foreign  
19 disinformation would be identified and you could  
20 share that information with them so they can knock  
21 down accounts and knock down disinformation  
22 content?

23 A. Yeah, so looking at that sentence and from  
24 my recollection, the FBI part of it is the  
25 information sharing portion, and then the social

1 media company portion is to decide if it violates  
2 their terms of service. And if it does violate  
3 their terms of service, one of the actions they  
4 could take is to knock down accounts or to knock  
5 down content.

6 **Q. And the purpose of the information sharing**  
7 **is the get them to assess it; and potentially if it**  
8 **violates the terms of service, to knock down**  
9 **content, correct, right?**

10 MR. SUR: Objection; mischaracterizes the  
11 document, calls for speculation.

12 THE WITNESS: Our -- my purpose was to  
13 share information with them so that they could  
14 protect their platforms as they deemed appropriate.  
15 I did highlight two of the actions that they could  
16 potentially take, which include knocking down  
17 accounts or knocking down misinformation content.

18 **Q. BY MR. SAUER: And you're aware that they**  
19 **do both of those things in response to your reports**  
20 **of disinformation on their platforms?**

21 A. I am aware of that because of the feedback  
22 they have provided me on several occasions.

23 **Q. Do you know Jen Easterly?**

24 A. I do know Jen Easterly.

25 **Q. How do you know Jen Easterly?**

1           A.    I actually met her at this conference for  
2   the first time.

3           **Q.    Had you been aware of her before that?**

4           A.    I was aware when she was nominated and  
5   confirmed for her role as the director of CISA.

6           **Q.    Were you aware that she's a Star Trek fan?**

7           A.    I am aware that she's a Star Trek fan.

8           **Q.    How do you know that?**

9           A.    From reading news articles about her,  
10   specifically at the Black Hat and DEF CON  
11   conference which had happened previously.

12          **Q.    What is the Black Hat and DEF CON  
13   conference?**

14          A.    That -- those are two conferences which  
15   are back to back in Las Vegas sometime in the  
16   summer, and they are -- next to the RSA  
17   conference -- the leading cybersecurity conferences  
18   in the American industry.

19          **Q.    Did you have any -- have you had any  
20   communications with Jen Easterly about  
21   disinformation on social media?**

22          A.    No, I have not had -- the one time I met  
23   her in person was at the RSA conference.  And  
24   primarily what I recollect us talking about was  
25   that I wanted her to have additional CISA

1 personnel, specifically to embed with FBI San  
2 Francisco cyber task force.

3 **Q. Did she agree to that?**

4 A. She said that she would work on it.

5 **Q. Did it happen?**

6 A. I was told by the CISA official, the  
7 regional CISA officials that I work with that there  
8 are funded bullets to hire people, but they are --  
9 I believe they are still going through the hiring  
10 process.

11 **Q. Who are the regional CISA officials that**  
12 **you work with?**

13 A. There are two regional CISA officials that  
14 I work with. One individual is based in  
15 Sacramento. His name is Mario Garcia. And then  
16 the second individual is based in the Los Angeles  
17 area. His name is Joseph Oregon.

18 **Q. How do you -- what do you do to work with**  
19 **them?**

20 A. So primarily when I work with them, it is  
21 on cybersecurity matters. So we coordinate  
22 regularly with CISA on any cyber attacks against  
23 critical infrastructure companies.

24 For example, a ransomware attack or a data  
25 breach against an energy company or -- yeah,

1 specifically an example I can give you is the  
2 ransomware attack against the Colonial Pipeline  
3 Company.

4 **Q. Do you work with CISA on any**  
5 **disinformation issues?**

6 A. I do not work with those two individuals  
7 on disinformation issues.

8 **Q. Do you work with anyone else at CISA on**  
9 **any disinformation issues?**

10 A. Only as we have discussed in the CISA-led  
11 USG-industry working group meetings.

12 **Q. I am going to open up Exhibit 6 again and**  
13 **share it with you. These are the amended**  
14 **interrogatory responses. Can you see them on the**  
15 **screen share now?**

16 A. Which exhibit is that?

17 MR. SUR: This is 6. This is on the first  
18 page.

19 THE WITNESS: Okay.

20 **Q. BY MR. SAUER: I am going to scroll back**  
21 **down to Page 38.**

22 A. Okay.

23 **Q. We talked a bit about this USG-industry**  
24 **meeting that's identified here, correct?**

25 A. You're on the first bullet on that page,

1 is that what you're referring to?

2 **Q. The first bullet on Page 37.**

3 A. Okay. "A recurring meeting usually  
4 entitled USG-industry meeting," yes.

5 **Q. Okay. We talked about -- I think we**  
6 **talked about the participants in this meeting in**  
7 **detail, and the CISA participants you mentioned are**  
8 **Matt Masterson and Brian Scully?**

9 A. That's correct.

10 **Q. How about DHS's Office of Intelligence and**  
11 **Analysis, who participated from there?**

12 A. I can't remember. I believe whoever was  
13 the head of that organization -- someone from I&A  
14 showed up, but I don't remember the names.

15 **Q. What does I&A do? What is it?**

16 A. So from my knowledge of I&A, they are the  
17 intelligence community agency, or at least one of  
18 them, within the Department of Homeland Security.  
19 What I -- the products that I have seen from them  
20 are all-source products, which means I have seen  
21 them take, you know, intelligence reports from  
22 different government agencies and provide more  
23 strategic overview types of products. That is what  
24 I have personally seen from I&A.

25 **Q. Let's scroll down to this next bullet**

1 point where it talks about a CISA cybersecurity  
2 advisory meeting. Do you know anything about those  
3 meetings between CISA and social media platforms?

4 A. I have never heard of the CISA  
5 cybersecurity advisory committee meetings. I have  
6 never heard of that organization within CISA.

7 Q. How about "ASD-HKS Tech Policy Paper  
8 Series," do you know anything about those meetings?

9 A. No, I don't even know what the acronym  
10 stands for.

11 Q. How about "DHS/Microsoft Disinformation  
12 Follow Up"?

13 A. I have no idea what that is in reference  
14 to.

15 Q. Let's scroll down to the CISA response.  
16 See there's an additional response under the  
17 heading here "CISA"; do you see that?

18 A. Yes.

19 Q. And that's CISA, C-I-S-A, in all caps?

20 A. Yes.

21 Q. It looks like it is identical to the  
22 bullet point above that we discussed.

23 There's a reference here in the second  
24 bullet point to "A recurring meeting to prepare for  
25 and set the agenda for the USG-industry meeting,

1 and participants have generally included CISA and  
2 Facebook." Do you see that?

3 A. I see that.

4 Q. That is a meeting to prepare for the  
5 meeting that we talked about in detail; is that  
6 right?

7 A. I see that.

8 Q. Were you aware that there were such  
9 meetings?

10 A. I was not aware that there was a separate  
11 preparatory meeting between CISA and Facebook ahead  
12 of the broader USG-industry meeting. I was only  
13 aware of the USG side, you know, where they would  
14 convene us to ask us, specifically the FBI and the  
15 other federal components, what agenda topics we  
16 wanted to talk about.

17 Q. So you participated in your own  
18 preparatory meeting with CISA that did not involve  
19 social media platforms, correct?

20 A. That is correct.

21 Q. During the course of those preparatory  
22 meetings, CISA would ask the FBI, you, Elvis Chan,  
23 what topics it might be useful to discuss at the  
24 USG-industry meeting?

25 A. Yes. They would ask the FBI, and I was a



1 part of the contingent.

2 **Q. Who was on that contingent?**

3 A. It would typically be Laura -- the  
4 individuals that I mentioned from FITF, Laura  
5 Dehmlow, Luke Giannini, Bill Cone, Brady Olson,  
6 Judy Chock. It would not necessarily be all of  
7 them, but it would be a subset of them or at least  
8 one of them. Sometimes the FBI would not have any  
9 agenda items for the CISA-hosted meetings.

10 **Q. Anyone else from FBI participate in those**  
11 **meetings?**

12 A. I can't recollect anyone else.

13 **Q. How about who from CISA would participate**  
14 **in those meetings?**

15 A. As I mentioned to you, the two people I  
16 remember are Mr. Masterson and Mr. Scully.

17 **Q. The same two who had run the USG-industry**  
18 **meeting, the big meeting, right?**

19 A. They were the two ranking officials that I  
20 was aware of from CISA.

21 **Q. Would those preparatory meetings be just**  
22 **Mr. Scully and Mr. Masterson and FBI, or would**  
23 **other agencies be involved with them?**

24 A. From my recollection, the ODNI, I&A, they  
25 would be involved in them as well. So we may have

1 the preparatory call or we may just have a  
2 coordination email. I remember both of those  
3 methods happening.

4 **Q. In either the email or the preparatory**  
5 **call, did anyone ever discuss raising hack-and-leak**  
6 **operations or the risk of hack-and-leak operations**  
7 **in a USG-industry meeting?**

8 MR. SUR: Objection; falls within the  
9 deliberative process privilege for interagency  
10 discussions and recommendations.

11 THE WITNESS: Yeah, I don't recollect that  
12 being a specific topic of discussion.

13 In my recollection, or in my opinion, this  
14 would be just a general topic of continued  
15 interest.

16 **Q. BY MR. SAUER: What else was discussed in**  
17 **those preparatory meetings, to your recollection?**

18 MR. SUR: Objection; deliberative process  
19 privilege covers interagency advice and  
20 recommendations before a decision is made. So I am  
21 going to -- you can respond if you can without  
22 describing the specifics of any proposals or  
23 recommendations.

24 THE WITNESS: All I can remember are the  
25 actual agenda items. So as I mentioned to you

1 previously, CISA would talk about state, county,  
2 local election processes and infrastructure and  
3 cybersecurity.

4 ODNI, when they spoke, substantively would  
5 discuss an unclassified description or overview of  
6 potential nation-state threats.

7 And then the FBI would discuss any  
8 unclassified information or concerns that we had  
9 related to malign-foreign-influence disinformation  
10 campaigns.

11 **Q. BY MR. SAUER: Would that include the kind**  
12 **of strategic and tactical information you testified**  
13 **about earlier?**

14 A. No. It would be a very condensed or, I'm  
15 sorry, more general version of strategic  
16 information that we would share with the specific  
17 companies, and we would never share tactical  
18 information at the CISA-hosted meetings.

19 **Q. That would only be on the kind of one**  
20 **or -- sort of one-on-one meeting, not really**  
21 **one-on-one, but FBI meeting with a specific social**  
22 **media platform, correct?**

23 A. Yes, that is -- that is correct. And the  
24 reason for that is because we would be providing  
25 law enforcement sensitive information in some

1 instances to the companies.

2 Q. Next bullet point refers to a CISA  
3 Cybersecurity Advisory Committee meetings on  
4 certain dates in 2021 and 2022. Do you know what  
5 those meetings are about?

6 A. I do not.

7 Q. Below that, "CISA CSAC, protecting  
8 critical infrastructure from misinformation and  
9 disinformation subcommittee meetings"?

10 A. I have no idea what those are.

11 Q. How about this next bullet point,  
12 "Meetings convened by the Election Infrastructure  
13 Subsector Government Coordinating Council  
14 (EIS-GCC)," do you know what the EIS-GCC is?

15 A. I do not know what that organization is.

16 Q. How about the Election Infrastructure  
17 Subsector Government Coordinating Council Joint MDM  
18 Working Group?

19 A. I do not know what that is.

20 Q. Do you know what the Joint MDM Working  
21 Group is?

22 A. I do not know what that is.

23 Q. Slipping back, it had to be recurring  
24 USG-industry meetings, I can't remember if you said  
25 this earlier, these continued throughout 2022,

1 correct?

2 A. Yeah, they are continuing.

3 Q. And they are planned to continue through  
4 2024, right?

5 A. I don't know that for a fact, but I would  
6 assume so.

7 Q. And disinformation concerns are discussed  
8 at these meetings on a regular basis?

9 A. I would say from the companies -- so as I  
10 mentioned to you previously, the federal agencies  
11 discuss the topics that they discuss, and then the  
12 social media companies, they -- they provide an  
13 overview of the content, which is what I would  
14 categorize the disinformation as.

15 For example, CISA would talk about the  
16 state election process and different states have  
17 different dates for primaries, and, you know, the  
18 ODNI would provide threat actor -- nation-state  
19 threat actor updates, and then the FBI would  
20 provide a broad overview of what we were seeing  
21 from, like, Russian and state-sponsored actors.

22 Q. And then the social media platforms, would  
23 they report on what sorts of disinformation they  
24 were seeing on posts on their platforms?

25 A. Yes, that is correct. And from my

1 recollection, this primarily came from the three  
2 social media companies, Google, Facebook and  
3 Twitter.

4 **Q. So in these USG-industry meetings, Google,**  
5 **Facebook and Twitter would report on what sorts of**  
6 **election-related disinformation they are seeing on**  
7 **their platforms?**

8 A. I would say they would discuss what broad  
9 types of disinformation they received, whether it  
10 was election related or not. And the example I  
11 want to flag for you is from my thesis where, for  
12 example, you saw like the postings about like Black  
13 Lives Matters or about 2nd Amendment rights, they  
14 would -- they would highlight the current topics  
15 that they saw the Russians were either amplifying  
16 information about or sowing disinformation about.

17 **Q. And would you take anything -- let me ask**  
18 **you this: If they provided that information, would**  
19 **there be a back-and-forth with the FBI or another**  
20 **federal agency about how that jibes with the**  
21 **information the FBI was seeing in its**  
22 **investigations?**

23 A. We would not discuss that during the  
24 CISA-hosted USG-industry meetings.

25 **Q. Would you take what the social media**

1 **platforms had reported, that information, and take**  
2 **further action based on that generally?**

3 A. In general -- in general what the social  
4 media companies provided at the CISA-industry USG  
5 working group meetings was just broad, strategic  
6 trends that they were seeing. So there was no  
7 actionable information from there.

8 The actionable information shared with the  
9 FBI was one-on-one from the companies with FBI San  
10 Francisco either during the FITF meetings or  
11 outside of the FITF meetings just during the  
12 regular course of work.

13 MR. SAUER: Why don't we go off the  
14 record.

15 THE VIDEOGRAPHER: Off the record at 5:04  
16 p.m.

17 (Whereupon a recess was taken.)

18 THE VIDEOGRAPHER: We are back on the  
19 record at 5:15 p.m.

20 (Reporter marked Exhibit No. 2 for  
21 identification.)

22 Q. BY MR. SAUER: Mr. Chan, I am going to  
23 show you Exhibit 2, which I emailed to your counsel  
24 earlier today. This is the read-through version on  
25 the screen of the LinkedIn emails.

1           **Mr. Chan, have you actually reviewed this**  
2           **collection of emails?**

3           A.    I have not.

4           **Q.    Okay. Are you aware that you're on 121**  
5           **pages of emails with the social media platform**  
6           **LinkedIn setting up meetings in 2020 and 2022, as**  
7           **you talked about today?**

8           A.    So I don't know the exact number, but I  
9           believe that sounds about right.

10          **Q.    And that would be -- what you did with**  
11          **LinkedIn, you also would have done with about six**  
12          **or seven other social media platforms as well,**  
13          **scheduling monthly -- sorry, quarterly then monthly**  
14          **then weekly meetings that led up to the elections,**  
15          **right?**

16          A.    That's correct, they would be similar  
17          types of correspondence.

18          **Q.    On the first page here you talk about**  
19          **"Increased cadence touch point before election"**  
20          **when you're sending an invite to them. Why did you**  
21          **increase cadence before the election?**

22          A.    This was actually at the company's  
23          request. We said, "Do you think a quarterly  
24          cadence is enough or should we go to a more  
25          frequent cadence?" I would say -- I can't remember



1 which companies, but I would characterize most of  
2 the companies as wanting at least a weekly cadence  
3 just to have a touch point on the calendar in case  
4 they or we wanted to talk about something.

5 **Q. Typically did you actually meet with them**  
6 **on a weekly basis in the two months or so before**  
7 **the election?**

8 A. I think generally we had a meeting, but  
9 like I don't remember, like, the substance. You  
10 know, if during this message thread I may have, you  
11 know, put an agenda item or two, then we would have  
12 had substance. But I can't remember just from  
13 looking at these emails. I would have documented  
14 any substantive meetings that we had with LinkedIn  
15 or any of the other companies.

16 **Q. When you say "documented," did you write**  
17 **up a report of it?**

18 A. Yes. So the system of record for the FBI  
19 is called Sentinel. It is a file management  
20 system, and I would have and I did document every  
21 substantive interaction that I had with social  
22 media companies, or actually any organization, for  
23 that matter.

24 **Q. Would you have written Sentinel reports**  
25 **for all of the FITF social media platform meetings?**

1           A.    Based on my recollection, I wrote almost  
2   all of them, but maybe not all of them.  And the  
3   reason I say that is malign foreign influence is  
4   just one of the issues that I have to deal with in  
5   my role.  The majority of my role is dealing with  
6   cyber investigations.  So maybe on a couple of  
7   occasions I may have asked someone else to write  
8   the meeting summary on my behalf.

9           **Q.    But there would be a Sentinel report for**  
10   **every meeting that you had with a social media**  
11   **platform that discussed this information and/or**  
12   **malign foreign influence?**

13          A.    Yes.  There would be -- in FBI parlance,  
14   they are called electronic communications, ECs.

15          **Q.    So ECs exist that record your**  
16   **contemporaneous recollection of all of these**  
17   **meetings we have been talking about?**

18          A.    That is correct.

19          **Q.    And do those ECs exist with respect to the**  
20   **USG-industry meetings?**

21          A.    I would say that I documented all the  
22   meetings that I attended at those CISA USG-industry  
23   meetings.

24          **Q.    So you -- would you have documented what**  
25   **discussions that were related to foreign hacking**

1     **attempts?**

2           A.    I think in general, my practice for that  
3     was I would take the agenda from the email provided  
4     by CISA, and then I would cut and paste that or I  
5     would just retype that into my meeting summary.

6           **Q.    So your meeting summary would just be the**  
7     **agenda that you were given?**

8           A.    Yes.  I would say in the vast majority, if  
9     not all, of the communications.  And the reason for  
10    that is because they were just very broad overviews  
11    or, you know, trends that were being discussed.

12          **Q.    Whereas you'd have more specific detail in**  
13    **your ECs with respect to the FITF social media**  
14    **platform bilateral sync meetings?**

15          A.    That is correct.  I believe the reason for  
16    that is because the companies felt more comfortable  
17    or more forthcoming in a bilateral setting as  
18    opposed to in a group setting because these  
19    companies are all competitors at the end of the  
20    day.  That is just my personal opinion.

21          **Q.    On the third page of this document, where**  
22    **are those -- by the way, where are those ECs**  
23    **stored, or they are all housed by the FBI?**

24          A.    Yeah.  As I mentioned, they are in an  
25    application called Sentinel.  They would be

1 stored -- so as I mentioned, Sentinel is a case  
2 file management system. So they would be  
3 documented to the appropriate case file.

4 Q. And then -- and those reports still exist,  
5 correct?

6 A. Yes.

7 Q. The third page of this document there's a  
8 response to you from someone at LinkedIn whose  
9 identity is redacted, but they are identified as  
10 "Director of Threat Prevention LinkedIn Trust &  
11 Safety."

12 (Discussion off the record.)

13 Q. BY MR. SAUER: Third page of this  
14 document, now do you see it on the screen share?  
15 You are communicating with --

16 A. Is it the one -- is it the one dated  
17 September 29, 2020, 11:17 a.m.?

18 Q. Yes. No, 11:39 a.m., third page of the  
19 document. Just if you look at the -- can you see  
20 it on the screen share? I am highlighting it.

21 A. Yeah, it looks like the email was sent  
22 Tuesday, September 29, 2020, 11:17 a.m.

23 Q. Yeah, yeah, you're right. I'm sorry. I  
24 was looking at the top.

25 My only question is: Is this consistent

1 with what you testified earlier, that in these  
2 bilateral meetings between FITF and the social  
3 media platforms, the people that you would be  
4 meeting with would be trust and safety and site  
5 integrity people, correct?

6 A. Yes. Yeah, it would be typically director  
7 level and then their direct reports and, you know,  
8 people from the organizations.

9 Q. I am going to jump ahead to this page  
10 which is labeled LinkedIn 86. It is the seventh  
11 page of the PDF. Here in your email you see dated  
12 Tuesday, November 17, 2020, which is right after  
13 the 2020 election, you tell LinkedIn folks that you  
14 want to have a, quote, Post Election Hot Wash.  
15 What on earth does that mean, "hot wash"?

16 MR. SUR: I am sorry to interrupt. Can I  
17 ask for you to repeat what page you are on? This  
18 is a large document.

19 MR. SAUER: Seventh page of the PDF.

20 MR. SUR: Seventh page of the PDF.

21 MR. SAUER: It's got Bates No. 86 at the  
22 bottom.

23 MR. SUR: Okay. Okay. Mr. Chan, if you  
24 want to read the document.

25 THE WITNESS: Is this a document dated

1 Tuesday, November 17th, 2020, 12:16:09 p.m.?

2 Q. BY MR. SAUER: Yeah. And you say --

3 A. If you could bear with me while I read my  
4 email.

5 Q. Sure.

6 A. Oh, yeah, so you said the second agenda  
7 item was "Post Election Hot Wash"?

8 Q. Yeah. What does that mean?

9 A. So sorry. That is a law enforcement term.  
10 A hot wash -- so after the FBI -- when we conduct a  
11 search operation or execute an arrest operation,  
12 after we're done with the operation, then we have a  
13 meeting as closely thereafter the operation as we  
14 can to discuss what we thought went well, what we  
15 thought needs improvement, what we think needs to  
16 change for next time.

17 So a hot wash is similar to an  
18 after-action meeting.

19 Q. Did you discuss with all the social media  
20 platforms what went well, what didn't go well and  
21 what we need to do differently next time?

22 A. Yes. From my recollection, we had hot  
23 wash meetings with all of the social media  
24 companies that I previously listed.

25 Q. And what did -- what did you all think

1     **went well and think didn't go well?**

2           A.     So based on my recollection, this is  
3     specifically during the election command post that  
4     this hot wash occurred.  So after the election  
5     command post.  So my recollection was the hot wash  
6     was specifically about the election command post.

7           And for that context, what the companies  
8     said worked well was that -- I don't know if I  
9     mentioned this yet, but we used two separate  
10    communication channels to communicate with the  
11    social media companies at the election command  
12    post.  One was called Signal -- I don't know if  
13    you're familiar with that communication  
14    application.  It's an encrypted chat app.

15           And then the second method is via the  
16    Teleporter application, which I referenced before  
17    is the FBI's secure file transfer application.

18           So as I mentioned before, the companies  
19    liked knowing that they were getting information in  
20    realtime from the FBI and that they were getting  
21    the same information as all of the other companies  
22    on the Signal chat app.  That was one of the things  
23    I was highlighting as good.

24           Another thing that was highlighted as good  
25    by the companies who received information from us

1 is we would send information about malign foreign  
2 influence to specific companies as we became aware  
3 of it, and then they would review it and determine  
4 if they needed to take action.

5 So the companies who did receive  
6 one-to-one Teleporter information from us also  
7 liked that.

8 So those were the two things that I  
9 remember that people liked in general.

10 **Q. What did they not like?**

11 A. So I think that -- so I don't remember the  
12 social media companies telling us there wasn't  
13 anything that they did not like. What I do  
14 remember was I can't remember who, perhaps it was  
15 me, just so you're aware, for the Signal channel,  
16 it was one-way communication. It was the FBI,  
17 specifically the FBI San Francisco command post,  
18 disseminating information to the companies.

19 If the companies needed to relay  
20 information back to the FBI, they would contact the  
21 FBI San Francisco election command post either by  
22 telephone or by email and request a Teleporter  
23 link, and then they would share information back to  
24 us in that fashion.

25 **Q. You think that was a cumbersome process?**



1           A.     It was not realtime. I mean, at the end  
2     of the day, I don't remember any specific instance  
3     where the delay caused any harm to anything, but I  
4     think what my preference would have been was for --  
5     if they needed to, to set up direct Signal channels  
6     only with the FBI so that they could get realtime  
7     information as well.

8                     But the social media companies -- or  
9     actually all of the companies who were on the  
10    receiving end, they -- I was told that they all had  
11    an internal discussion and their preference was to  
12    only use Signal for FBI broadcasts.

13           **Q.     You mentioned Signal and Teleporter as two**  
14    **channels of communication between the FBI and the**  
15    **social media companies. Are there any others?**

16           A.     No. So, I mean -- let me rephrase that.  
17    The only other commun- -- the only other situations  
18    where we relayed information to the companies was  
19    during those quarterly or monthly or weekly FITF  
20    meetings with the social media companies. So that,  
21    I guess, would be a third method of relaying  
22    information.

23           **Q.     Is Signal a self-deleting app? Is it an**  
24    **app where your messages disappear after they are**  
25    **read?**

1           A.     So yes, in general, Signal is a  
2 self-deleting app. But based on guidance from FBI  
3 headquarters, we had to turn that functionality off  
4 because we needed to save all of that information.  
5 So we did. We took screen shots of all of the  
6 information on the Signal channel. We burned it to  
7 DVDs, and then we have saved it as evidence.

8           **Q.     So all the -- all the communications on**  
9 **Signal between FBI and social media platforms from**  
10 **2022 and 2020 are saved on -- on DVDs or CDs?**

11          A.     No. Only the information -- only the  
12 Signal information from the 2020 FBI San Francisco  
13 command post was saved. And the reason for that  
14 was both the social media companies as well as the  
15 FBI assessed that there would not require the need  
16 for the Signal channel because we did not  
17 anticipate a large amount of information being  
18 disseminated from the FBI for the 2022 midterm  
19 elections.

20          **Q.     Did you not use Signal at all in 2022?**

21          A.     No. It was primarily through Teleporter.

22          **Q.     You did use Teleporter for the 2022**  
23 **elections to report misinformation concerns to**  
24 **social media platforms?**

25          A.     That is correct.

1 Q. And then you used both version -- or both  
2 channels in 2020?

3 A. That's correct.

4 Q. And the Teleporter communication still  
5 exists as well; is that right?

6 A. Yes, they currently exist.

7 Q. On this same page you talk about "what we  
8 need to do differently for next time." What did  
9 you -- what did you all decide you need to do  
10 differently next time?

11 MR. SUR: Objection; calls for  
12 speculation.

13 THE WITNESS: Honestly, I wrote that down,  
14 but I don't remember any things that the companies  
15 wanted to do differently.

16 Q. BY MR. SAUER: I take it one thing you did  
17 do differently was you stopped using Signal, right?

18 A. Well, that was for the 2022 elections only  
19 because both the companies and the FBI assessed  
20 that there would not be the same volume of  
21 information that happened in the 2020 cycle. I  
22 believe that differentiation is, you know, between  
23 a general elections versus a midterm election.

24 MR. SAUER: I am going to jump ahead to  
25 the page marked LinkedIn 146. And Indraneel, it is

1 the tenth page of the PDF.

2 MR. SUR: Tenth page of the PDF.

3 Q. BY MR. SAUER: If you go up there on the  
4 ninth page, Agent Chan, you see that Tuesday, July  
5 14th, 2020, 11:02 a.m. there's an email from you to  
6 the LinkedIn team?

7 MR. SUR: I apologize. I am not seeing  
8 the date. Is the date at the bottom of the  
9 previous page?

10 MR. SAUER: The date's at the bottom of  
11 Page 9 if you look at the file share.

12 THE WITNESS: Did you say July 14, 2020,  
13 11:02 a.m.?

14 Q. BY MR. SAUER: I said that.

15 A. Okay.

16 Q. If you scroll down, you are talking about  
17 having the next round of FITF bilateral meetings  
18 with LinkedIn scheduled. Do you see that?

19 A. Correct.

20 Q. And then at the bottom you say, "Planning  
21 for U.S. elections: FBI posture, your posture, and  
22 the information sharing" channel and "channels and  
23 methods," correct?

24 A. Yes.

25 Q. What did you mean by "FBI posture and your

1 **posture"?**

2 A. The FBI posture was what the FBI San  
3 Francisco command post would look like, when it  
4 would be active, who it would be staffed by. And  
5 then the FITF personnel would describe what the FBI  
6 headquarters command post would look like. That's  
7 what was meant by "FBI posture."

8 **Q. This is planning --**

9 A. And then your --

10 **Q. Go ahead.**

11 A. And then "Your posture," that's when we  
12 asked the companies how they expected to have  
13 personnel.

14 Just so you're aware, I think in general,  
15 like FBI -- so FBI headquarters, they just ran 24  
16 hours a day for their command post, I believe from  
17 Friday to Tuesday. FBI San Francisco ran from, I  
18 believe, 8:00 o'clock in the morning to perhaps  
19 10:00 o'clock at night every day except the  
20 election, when we ran until midnight.

21 So asking about your posture would be  
22 asking the companies when they intended to have  
23 personnel on what days monitoring their platform  
24 for any threats that they saw.

25 **Q. And what did you say about information**

1 **sharing channels and methods?**

2 A. So I think that is when we wanted to  
3 confirm if Signal and Teleporter would be the  
4 accepted communication channels.

5 **Q. Anything else?**

6 A. Not that I'm aware of.

7 **Q. Were the tech companies okay with using**  
8 **Signal and Teleporter?**

9 A. So the tech companies were the ones who  
10 suggested Signal as the real -- the, quote/unquote,  
11 realtime communication platform.

12 **Q. And the FBI continued to use Teleporter as**  
13 **well?**

14 A. Yes. Because that is our secure file  
15 transfer system, and I believe that the companies  
16 were comfortable using that system.

17 **Q. Jump ahead to LinkedIn 163.**

18 **(Discussion off the record.)**

19 MR. SUR: May I ask what the SES heading  
20 is?

21 MR. SAUER: This is the twenty-first page  
22 of the PDF.

23 **Q. Agent Chan, you see there on the file**  
24 **share this is an email from you to the LinkedIn**  
25 **team dated October 19th, 2020?**

1 MR. SUR: Yes, let's just give him a  
2 moment to see it on the screen.

3 THE WITNESS: Yes, I see that email.

4 Q. BY MR. SAUER: In this email you say  
5 "LinkedIn folks," says, "Subject: Additional  
6 information," correct?

7 A. Yes.

8 Q. There's a gentleman here who you've copied  
9 from -- right there with the initials AF from the  
10 FBI. Do you see that?

11 A. Yes, I do.

12 Q. Who is he?

13 A. He is a member of the Foreign Influence  
14 Task Force, specifically the global unit.

15 Q. What does "CID" stand for next to his  
16 name?

17 A. Criminal Investigative Division. That's a  
18 headquarters component.

19 Q. You refer to someone by a nickname here  
20 and in the body of the email. Is that the same  
21 individual with the initials AF?

22 A. That is correct.

23 Q. You say, "LinkedIn folks, please see  
24 additional information from FITF-Global Unit. I  
25 have cc'd" that guy "in case you have any

1       **questions. Thanks."**

2               **Do you have any idea what the initial**  
3       **information was you are sending here?**

4               A.    I have -- I have no idea. I can't  
5       remember. I sent so much -- you know, it happens  
6       so regularly, I couldn't even speculate.

7               **Q.    It says -- it looks like you cut and**  
8       **pasted some texts saying, "Named U.S. political**  
9       **party: Republicans. Named U.S. presidential**  
10       **candidate: Biden. The U.S. President: Trump."**  
11       **Do you have any idea what that's referring to?**

12              A.    I don't. I can provide you with my  
13       speculation.

14              **Q.    Go ahead.**

15              A.    I believe that link -- I believe that we  
16       may not have named with specificity the U.S.  
17       political party, the U.S. presidential candidate or  
18       the U.S. president, and that LinkedIn may have  
19       asked for clarifying information.

20              **Q.    About what, clarifying --**

21              A.    About the information that was shared.

22              **Q.    Here there's a reference here to**  
23       **"Information Sharing 5," right?**

24              A.    Yes.

25              **Q.    What's that mean?**



1           A.     So to me that would mean I had probably  
2     shared -- I don't know this for a fact, but from my  
3     own speculation, I would believe that at some point  
4     in October I shared five separate documents with --  
5     at least five separate documents with LinkedIn, and  
6     that one of the documents was named "Information  
7     Sharing 5," and that within that document we have  
8     information about a U.S. political party, a U.S.  
9     presidential candidate and a U.S. president.

10           **Q.     What kind of information about the U.S.**  
11     **political party, presidential candidate, president**  
12     **would you have shared with LinkedIn?**

13           A.     I have -- I have no idea. I can't  
14     recollect, unfortunately, without looking at the  
15     actual document.

16           **Q.     Would it be disinformation related?**

17           A.     My guess would be it would be  
18     disinformation related. And because it's coming  
19     from the global unit, it would be disinformation  
20     information not related to Russia or China.  
21     Because global unit handles Iran and other  
22     countries.

23           **Q.     This would be a potentially**  
24     **malign-foreign-influence-type activity from**  
25     **countries other than Russia or China?**

1           A.     Without seeing the actual document or  
2 remembering at this time, that would be my best  
3 assessment.

4           **Q.     Let me jump ahead to a page marked**  
5 **LinkedIn 168. This is the twenty-sixth page of the**  
6 **PDF. Are you with me?**

7           MR. SUR: Yes. Mr. Chan needs a moment to  
8 review the document.

9           THE WITNESS: Is this a document sent on  
10 11/19/2020 9:07:16 a.m.?

11          **Q.     BY MR. SAUER: Correct. In this email you**  
12 **say, "LinkedIn folks, heads up I'll be sending you**  
13 **a Teleporter link with new indicators, which are**  
14 **not election related." Do you know what that**  
15 **means?**

16          A.     I can't remember, but I would surmise that  
17 it meant it was not related to the election that  
18 just occurred earlier in the month.

19          **Q.     And then indicators I think you testified**  
20 **earlier refers to URLs or specific accounts or**  
21 **things of that nature, right?**

22          A.     Yes. It would be different indicia of  
23 that nature.

24          **Q.     So do you flag disinformation/**  
25 **misinformation from malign foreign actors to social**

1 **media platforms that doesn't relate to elections?**

2 A. I don't know why I -- I can't remember why  
3 I flagged that as not being election related. I  
4 think the only -- I don't recall exactly, but I  
5 would surmise that I would have flagged it as  
6 election -- like, if it was election related, I  
7 believe that all of the companies, including  
8 LinkedIn, would have acted on it quickly.

9 You know, everyone was very tired from  
10 working very long hours and very long shifts during  
11 the election command posts.

12 So that would be the only reason -- or  
13 that would be a reason why I believe I would have  
14 flagged it as not election related so that they  
15 wouldn't have to, you know -- like, if they were  
16 taking the day off or taking time off because it  
17 was near Thanksgiving time frame.

18 **Q. What -- what malign-foreign-influence**  
19 **activities do you flag for social media companies**  
20 **that aren't related to elections? What sort of**  
21 **content do you flag?**

22 A. So in general, it would be -- in general,  
23 it would be from our cyber investigations, or from  
24 state-sponsored actors that were -- that we would  
25 not believe were associated with hack-and-dump

1 campaigns. That would be one type of nonelection  
2 related.

3 **Q. Are there others?**

4 A. Off the top of my head, that's the one  
5 that's sticking out to me. That would be a likely  
6 type of information. It would be related to a  
7 cyber investigation that was not necessarily  
8 related to any disinformation, specifically any  
9 malign foreign influence.

10 MR. SAUER: I don't have any further  
11 questions.

12 (Discussion off the record.)

13 EXAMINATION BY MR. SUR

14 **Q. Mr. Chan, you testified earlier today**  
15 **about the 2020 Hunter Biden laptop story in the**  
16 **questioning with Mr. Sauer. Do you remember the**  
17 **question that came from a Facebook analyst at one**  
18 **of the meetings in 2020?**

19 A. Yes.

20 **Q. Okay. And what was that question, to your**  
21 **recollection?**

22 A. To my recollection, the question was,  
23 "What can you share about the Hunter Biden case?"

24 **Q. And at that meeting you were there with**  
25 **other FBI officials; is that right?**

1           A.    Yes, with Foreign Influence Task Force  
2 officials.

3           **Q.    Okay.  And who were they again?**

4           A.    I specifically remember Laura Dehmlow was  
5 present because she was the official who said that  
6 the FBI had no comment.

7           **Q.    Okay.  Did she --**

8                               **(Discussion off the record.)**

9           **Q.    BY MR. SUR:  So picking up there, did**  
10 **Ms. Dehmlow say anything else?**

11          A.    Not in response to the Hunter Biden  
12 question.

13                       MR. SUR:  That's all I have.

14                       MR. SAUER:  Nothing further.

15                               (Discussion off the record.)

16                       THE VIDEOGRAPHER:  Okay.  This concludes  
17 today's deposition of Elvis Chan.  We are off the  
18 record at 5:47 p.m.

19                               (Whereupon the proceedings were  
20 concluded at 5:47 p.m.)

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I am not a relative or employee or attorney or counsel of any of the parties, nor am I a relative or employee of such attorney or counsel, nor am I financially interested in this action. (Fed. R. Civ. P. 28).

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/ / /

1 of the testimony given by the witness. (Fed. R. Civ. P.  
2 30(f)(1)).

3 Before completion of the deposition, review of  
4 the transcript [ ] was [ ] was not requested. If  
5 requested, any changes made by the deponent (and  
6 provided to the reporter) during the period allowed, are  
7 appended hereto. (Fed. R. Civ. P. 30(e)).

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LEXITAS LEGAL

December 5, 2022

DEPARTMENT OF JUSTICE  
1100 L Street Northwest  
Washington, D.C. 29530  
INDRANEEL SUR, ESQ.

IN RE: STATE OF MISSOURI, et al. v. JOSEPH R.  
BIDEN, JUNIOR, et al.

Dear Mr. Sur,

Please find enclosed your copies of the deposition of  
ELVIS CHAN taken on November 29, 2022 in the  
above-referenced case. Also enclosed is the original  
signature page and errata sheets.

Please have the witness read your copy of the  
transcript, indicate any changes and/or corrections  
desired on the errata sheets, and sign the signature  
page before a notary public.

Please return the errata sheets and notarized  
signature page within 30 days to our office at 711 N  
11th Street, St. Louis, MO 63101 for filing.

Sincerely,

LEXITAS LEGAL



1 ERRATA SHEET

2 Witness Name: ELVIS CHAN

3 Case Name: STATE OF MISSOURI, et al. v. JOSEPH R. BIDEN, JUNIOR, et al.

4 Date Taken: NOVEMBER 29, 2022

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6 Page # \_\_\_\_\_ Line # \_\_\_\_\_

7 Should read: \_\_\_\_\_

8 Reason for change: \_\_\_\_\_

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18 Page # \_\_\_\_\_ Line # \_\_\_\_\_

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22 Page # \_\_\_\_\_ Line # \_\_\_\_\_

23 Should read: \_\_\_\_\_

24 Reason for change: \_\_\_\_\_

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26 Witness Signature: \_\_\_\_\_

1 STATE OF \_\_\_\_\_ )

2 COUNTY OF \_\_\_\_\_ )

3

4 I, ELVIS CHAN, do hereby certify:

5 That I have read the foregoing deposition;

6 That I have made such changes in form

7 and/or substance to the within deposition as might

8 be necessary to render the same true and correct;

9 That having made such changes thereon, I

10 hereby subscribe my name to the deposition.

11 I declare under penalty of perjury that the

12 foregoing is true and correct.

13 Executed this \_\_\_\_\_ day of \_\_\_\_\_,

14 20\_\_\_\_, at \_\_\_\_\_.

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ELVIS CHAN

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NOTARY PUBLIC

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23 My Commission Expires:

24 135954

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