


September 1, 2020 Stipulation  
Attachment F  
**PP v. CMP**

 **Mueller, Gregory (Vol. 01) - 04/12/2019**

1 CLIP (RUNNING 00:34:30.247)

 **Mueller Direct**

**MUELLER DIRECT** **63 SEGMENTS (RUNNING 00:34:30.247)**



**1. PAGE 8:12 TO 8:13 (RUNNING 00:00:02.183)**

12 Q Good morning, Mr. Mueller.  
13 A Good morning.

**2. PAGE 17:24 TO 18:01 (RUNNING 00:00:04.481)**

24 Q Okay, and your -- remind me. Your title  
25 is what at CRC?  
00018:01 A I'm president.

**3. PAGE 19:06 TO 19:09 (RUNNING 00:00:12.379)**

06 Q Okay. So you're currently president of  
07 CRC, and it sounds like you have been for at least  
08 19 years, maybe more.  
09 A I think that's pretty accurate.

**4. PAGE 35:17 TO 35:21 (RUNNING 00:00:22.460)**

17 Q Okay. Is -- are you or CRC presently  
18 engaged by Mr. Daleiden?  
19 A We, we are, we are assisting him in  
20 litigation support, if that's what you're asking,  
21 in terms of communications and media.

**5. PAGE 38:12 TO 38:14 (RUNNING 00:00:07.596)**

12 Q Have you been doing work on let's just  
13 say at least a quarterly basis for Mr. Daleiden or  
14 CMP since 2015?

**6. PAGE 38:17 TO 38:23 (RUNNING 00:00:15.662)**

17 THE WITNESS: I would say  
18 quarterly. It's, it's more of a hit-or,  
19 hit-or-miss relationship. When there are  
20 inflection points, we try to help them out  
21 with either communication support of some  
22 kind.  
23 BY MR. KAMRAS:

**7. PAGE 38:24 TO 39:05 (RUNNING 00:00:21.633)**

24 Q What, what do you mean by "inflection  
25 points"?  
00039:01 A I would say with the, with the various  
02 litigation, there is -- again, we, we're a PR  
03 firm, so we do litigation communications work on  
04 occasion, and he falls into that category on  
05 occasion due to some of these lawsuits.

**8. PAGE 42:08 TO 42:21 (RUNNING 00:00:29.233)**

08 Q -- which is I wanted to know: In the  
09 period of time that you, that CRC has been  
10 providing services to Mr. Daleiden and CMP,  
11 spanning to 2015 --  
12 A Okay.  
13 Q -- do you know whether your services,  
14 CRC's services, have been paid for by a third

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15 party?  
16 A Am I aware of that?  
17 Q Yes.  
18 A Yes.  
19 Q Okay, and do you know who or what third  
20 parties?  
21 A If I recall, Students For Life.

**9. PAGE 48:09 TO 48:14 (RUNNING 00:00:16.228)**

09 Q Okay, and CRC was involved in the  
10 process by which those tapes were released and,  
11 and the media campaign associated with the release  
12 of those tapes?  
13 A Yeah, our job was to basically help get  
14 publicity for them.

**10. PAGE 60:04 TO 60:25 (RUNNING 00:01:17.881)**

04 Q And so what did you do between  
05 graduating from college and 1989?  
06 A Oh, boy. I came to Washington, and I  
07 worked in the mail office of the United States  
08 Senate, pitching mail at 4:30 in the morning. I  
09 did some fundraising work for different potential  
10 candidates, some -- mostly volunteer work for  
11 those first three months after I graduated, and  
12 then, then after that, I think I was a file clerk  
13 in a law firm.  
14 Q I'm sorry.  
15 A They talked me out of going to law  
16 school.  
17 And then after that, I think I joined  
18 another -- I think I joined a think tank, and then  
19 I went to another PR firm before we founded or CRC  
20 was founded.  
21 I think that covers it, to my best  
22 recollection.  
23 Q What think tank?  
24 A It was, it was called the National  
25 Conservative Foundation back then.

**11. PAGE 61:12 TO 61:13 (RUNNING 00:00:13.327)**

12 Q It's a media watchdog group that watches  
13 for liberal bias; is that correct?

**12. PAGE 61:16 TO 61:19 (RUNNING 00:00:09.554)**

16 THE WITNESS: Well, it does a lot  
17 of things. One of the things it does is  
18 documents liberal media bias, and it does  
19 analysis, studies.

**13. PAGE 65:13 TO 65:24 (RUNNING 00:00:50.593)**

13 Q Okay. So in, in 2015, you were, as  
14 we've established, you were president of CRC.  
15 What was -- what were your responsibilities as  
16 president?  
17 A Well, generally to play the role of the  
18 strategist and consultant for our clients, engage  
19 in media outreach, media relationships, if you  
20 will, do some, some writing, and then I oversee  
21 some of the higher level staff, but I oversee  
22 staff.  
23 I think that probably hits most of the  
24 highlights.

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14. PAGE 66:05 TO 66:06 (RUNNING 00:00:04.410)

05 Q And what does it mean to help plan  
06 publicity efforts?

15. PAGE 66:09 TO 66:15 (RUNNING 00:00:20.004)

09 THE WITNESS: It's usually general  
10 press materials in terms of, you know, how do  
11 you roll something out to get news attention.  
12 How do you -- press releases or statements  
13 that are going to be published, to get that  
14 information out to the public through the  
15 press.

16. PAGE 72:07 TO 72:16 (RUNNING 00:00:39.717)

07 Q Okay. How did you first become aware of  
08 Mr. Daleiden?  
09 A I think I first met David when he was  
10 working for Live Action. I don't fully recall,  
11 but I think that's when I first -- actually, I  
12 don't even know if I physically met him. He was  
13 on conference calls.  
14 Q And what is Live Action?  
15 A It's a pro-life group, best I could  
16 describe it.

17. PAGE 73:06 TO 73:07 (RUNNING 00:00:05.805)

06 Q Was CRC engaged by Live Action?  
07 A Yes.

18. PAGE 80:25 TO 81:21 (RUNNING 00:01:20.283)

25 Q Okay. So the, the undercover videos  
00081:01 that Mr. Daleiden filmed were released in July of  
02 2015.  
03 Do you recall that?  
04 A I don't recall the exact date, but I  
05 think that in that time frame is correct.  
06 Q So with that -- and we'll date it with  
07 more specificity later, but with that frame in  
08 mind, can you tell me whether this call that you  
09 were describing when Mr. Daleiden reached out to  
10 you to solicit CRC's services, did that occur in  
11 2015 or was it even before 2015?  
12 A I'm not 100 percent sure, but I'm fairly  
13 confident that he called us within the same year,  
14 calendar year as he was planning to release the  
15 videos. In other words, I don't think we -- I  
16 don't think -- I think when he reached out to us,  
17 it was in, it was in a -- I think it was in a --  
18 I'm not fully confident about this, so I don't  
19 recall specifically, but I think it was -- there  
20 wasn't a lot of time between the time he called us  
21 and the time he was releasing these videos.

19. PAGE 89:25 TO 90:04 (RUNNING 00:00:10.932)

25 When you had that first call and he  
00090:01 described these videos as "undercover" videos, was  
02 it your impression that the Planned Parenthood  
03 providers were aware of the fact that they were  
04 being filmed?

20. PAGE 90:08 TO 90:12 (RUNNING 00:00:13.251)

08 THE WITNESS: I mean I, I was  
09 assuming, which is an assumption, that when

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10 somebody says they're going undercover, that  
11 the person that they're interviewing is not  
12 aware that they are being interviewed.

21. PAGE 91:22 TO 91:25 (RUNNING 00:00:18.681)

22 Q Okay, so -- and were you aware -- either  
23 on that first call or at any later point, did  
24 Mr. Daleiden describe to you how he was able to  
25 get access to these conferences?

22. PAGE 92:03 TO 92:06 (RUNNING 00:00:10.443)

03 THE WITNESS: I don't recall any  
04 discussion about how he went about it. Most  
05 of our discussions were about how we would  
06 get publicity once he published the videos.

23. PAGE 92:19 TO 92:23 (RUNNING 00:00:18.260)

19 Q Did -- again, on that first phone call  
20 or at any other time, did Mr. Daleiden discuss  
21 with you having procured a false driver's license  
22 in order to gain access to either conferences or  
23 Planned Parenthood facilities?

24. PAGE 93:01 TO 93:04 (RUNNING 00:00:13.675)

00093:01 THE WITNESS: I don't recall him --  
02 I don't recall him ever informing me of that.  
03 Most of our conversations were about media,  
04 strategy to get publicity for the videos.

25. PAGE 105:05 TO 105:15 (RUNNING 00:00:29.769)

05 Q Yeah, so let's take the first video.  
06 That first video; do you recall the first video  
07 that was released on July 14, 2015, involved  
08 Dr. Nucatola of Planned Parenthood? Do you recall  
09 that?  
10 A I recall the video.  
11 Q Okay, and you recall that at least  
12 portions of that video were from a lunch that  
13 Dr. Nucatola had with Mr. Daleiden when he was  
14 posing undercover, correct?  
15 A Yes, I'm aware of that.

26. PAGE 105:23 TO 105:25 (RUNNING 00:00:11.759)

23 There was a -- the video that was  
24 released on July 14, 2015, by CMP was not the  
25 video of the entire lunch, correct?

27. PAGE 106:03 TO 106:22 (RUNNING 00:01:01.593)

03 THE WITNESS: I'm aware that the  
04 videos -- there's raw footage, and then  
05 there's the videos that were published for,  
06 for public interest purposes.

07 BY MR. KAMRAS:

08 Q Okay. Did you -- prior to the release  
09 of any of the videos, whether on July 14 or  
10 otherwise, did you watch, as you put it, the "raw  
11 footage" from which the released videos were  
12 taken?

13 A I watched, I watched, I watched the  
14 videos that he was producing. I don't, I don't  
15 recall if I watched all the hours of the videos.

16 Q Okay, and when you say "the videos that  
17 he was producing," just so we're clear, you're

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18 referring to the videos that typically ran a  
19 number of minutes, correct?  
20 A Yeah.  
21 Q They would be maybe five minutes or  
22 maybe even as long as ten minutes long, correct?

28. PAGE 107:01 TO 107:09 (RUNNING 00:00:22.123)

00107:01 THE WITNESS: So the videos I  
02 reviewed were what he was planning to release  
03 to the public, and then our job was to help  
04 him get attention for those. These videos  
05 were very similar to how you put a news  
06 segment together, but frankly they were  
07 longer than your average news segment that  
08 you see on the nightly news or on cable TV.  
09 Those are the videos I, I mostly focused on.

29. PAGE 107:11 TO 107:16 (RUNNING 00:00:26.481)

11 Q Okay, and you don't recall having viewed  
12 the, as you put it, the "raw footage" from which  
13 it was taken -- from which these produced videos  
14 were taken?  
15 A I don't recall looking at hours and  
16 hours of video, the raw, the raw video.

30. PAGE 107:17 TO 108:25 (RUNNING 00:01:48.986)

17 Q Still focusing on the period of time  
18 before the first video was released on July 14,  
19 2015, did Mr. Daleiden, whether on that first call  
20 or thereafter, describe to you what he hoped to  
21 accomplish by releasing these videos to the  
22 public?  
23 A I don't recall. On that first call --  
24 my best recollection of that first call and much  
25 of the planning that we were involved in was about  
00108:01 the strategy to get the videos out through the  
02 media to the public. That was generally what most  
03 of our conversations were about.  
04 Q Okay, but you understood that, as with  
05 most clients, he had some reason for releasing  
06 these videos, right?  
07 A Sure. I think he was trying to get the  
08 truth out about what he found.  
09 Q Okay, so that's -- I want to know what  
10 he told you about, if anything, about what his  
11 purpose was in releasing the videos.  
12 A This is on the first call or just  
13 generally?  
14 Q At any time prior to the release of the  
15 first video.  
16 A Okay. I don't recall we had very much  
17 of a conversation about what he was trying to  
18 accomplish. It seemed to me to be pretty obvious.  
19 He was -- he had video of what was being, was  
20 happening at these events, what they were talking  
21 about, and he wanted to release that to the  
22 public, and, and -- but I don't recall him  
23 specifically saying here's our end game or here's  
24 our objective. I don't, I don't recall that. It  
25 may have happened, but I don't recall it.

31. PAGE 116:06 TO 116:08 (RUNNING 00:00:07.705)

06 Q But you understand that that was his  
07 intent, right? His intent was to create negative  
08 public relations for Planned Parenthood?

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32. PAGE 116:11 TO 116:17 (RUNNING 00:00:12.608)

11 THE WITNESS: My understanding of  
12 his intent -- and you'd have to ask him these  
13 questions, and I'm sure you, you will -- was  
14 he was simply trying to get this information  
15 out to the public. He was trying to get the  
16 truth out to the public based on what his  
17 investigations had found.

33. PAGE 121:12 TO 121:25 (RUNNING 00:00:47.285)

12 What he says in this goal statement or  
13 statement of goal is -- you're right. He  
14 references illegality, but what he says is "to  
15 leverage evidence of Planned Parenthood's illegal  
16 supply of fetal tissue to maximum negative  
17 impact -- legal, political and professional,  
18 public -- on Planned Parenthood."  
19 And so I want to understand whether  
20 Mr. Daleiden expressed to you an intent and  
21 expectation that by releasing these videos, having  
22 filmed, produced and released these videos, that  
23 he could leverage, make use of what he claimed was  
24 evidence of illegal conduct in order to inflict  
25 maximum negative impact on Planned Parenthood?

34. PAGE 122:03 TO 122:16 (RUNNING 00:00:35.155)

03 THE WITNESS: I don't recall  
04 specifically him putting it quite that way,  
05 but I, I recall conversations, although again  
06 most of our conversations were about  
07 publicity efforts, but I do recall  
08 conversations in which he was talking about  
09 that there were potentially illegal acts, in  
10 his view, that was going on, or illegal  
11 activity that was going on here, and that  
12 this might have an impact on taxpayer funding  
13 of the organization, that therefore these  
14 videos would be of interest to the public who  
15 are paying the taxes for that, that  
16 organization.

35. PAGE 130:07 TO 132:01 (RUNNING 00:02:26.820)

07 Were you or CRC involved in helping to  
08 coordinate messaging with AUL, NRLC, and SBA  
09 concerning the release of the videos that  
10 Mr. Daleiden had filmed and produced?

11 A I mean -- do you mean was I talking to  
12 these organizations on how they should message  
13 once they came out?

14 Q Well, start there, sure.

15 A So again, our role in here in terms of  
16 what they hired our PR firm to do was to provide a  
17 media strategy to get the videos out once they  
18 were published, and then that usually included a  
19 press release that would go out to all the groups  
20 so they could engage with that content and get  
21 messages out as they saw fit to their audiences.  
22 That's generally what we did.

23 Q And did you have conversations with AUL,  
24 NRLC, and SBA about what those press releases  
25 should say or what the messaging about the videos  
00131:01 should be?

02 A I don't recall -- I -- to the best of my  
03 knowledge, we didn't write any of their press

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04 releases for them.

05 In terms of us suggesting how they might  
06 communicate or what was on the videos, that was  
07 sort of in the press releases already. All we did  
08 was push them out, if you will, to different, some  
09 of these different enterprises.

10 By the way, not all these enterprises.  
11 I don't know that -- I don't recall some of these  
12 enterprises being on list distributions when we  
13 released videos, myself. Some of them were, but  
14 I'd have to go back and look. I don't recall all  
15 these organizations being on those distributions,  
16 but the idea, the general question I think you're  
17 asking is, did we assist in the messaging of, of  
18 what was on these videos. Yes. That was part of  
19 our role.

20 Q And how did you assist in that  
21 messaging?

22 A Basically when the videos were coming  
23 out, the press releases would go out, and then we  
24 would communicate what was on the videos.

25 Basically the content again was already there.

00132:01 You didn't have to do very much messaging.

36. PAGE 132:02 TO 132:13 (RUNNING 00:00:45.049)

02 Q When you say you would, you, CRC, would  
03 communicate the content of the videos, communicate  
04 to whom? Just to make sure I understand.

05 A So when the press releases were written,  
06 we would send out emails to media and  
07 organizations, alerting them to what was the  
08 content of the videos, and then there would be a  
09 statement from Mr. Daleiden in those. He mostly  
10 wrote his own stuff and his own statements. He  
11 would consult with me, "is this the best way to  
12 say this," or something like that.

13 Q Okay. Why don't we turn to Exhibit 304.

37. PAGE 132:24 TO 135:06 (RUNNING 00:02:34.487)

24 Q I wanted to talk about this, because you  
25 had referenced distribution lists --

00133:01 A Yes.

02 Q -- and organizations that were on the  
03 distribution lists, and you'll see that this is --  
04 this, which is Exhibit 304, is an email dated  
05 July 13, 2015.

06 Do you see that?

07 A Yes, I do.

08 Q Okay, and so that's the day before the  
09 first video was to be released, correct?

10 A I don't recall the exact date of when  
11 the first video, but --

12 Q Well, look down at the bottom of this  
13 email, and you'll see --

14 A So there's the -- okay, so there's the  
15 embargo. Got it. Got it.

16 Q Let me -- so we're not talking over each  
17 other, if you look down at the bottom of the  
18 email, you'll see that there's an "embargoed press  
19 release concerning the release of a video  
20 concerning Planned Parenthood," right?

21 Do you see that?

22 A That's correct.

23 Q Okay, and it's embargoed until 8:00 a.m.  
24 on July 14, 2015, correct?

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25 A Correct.  
00134:01 Q Okay, and this email is dated the day  
02 before, July 13.  
03 Do you see that?  
04 A Yes, I do.  
05 Q Okay, and there are quite a number of  
06 people who are identified on the "to" list.  
07 Do you see that?  
08 A Yes, I do.  
09 Q Okay, and is this one of -- you had  
10 mentioned that you recall there being like  
11 distribution lists in which or through which the  
12 videos would be circulated or press releases would  
13 be circulated, and is this an example of such a  
14 distribution list?  
15 A I mean are you asking me if the  
16 information that we sent out when we release  
17 videos, did it go to this list every time?  
18 Q This list or a, you know, similar list.  
19 A It would, it would be a similar list,  
20 not this exact list.  
21 Q Okay, and, and this list includes --  
22 you'll see that the email that Mr. Daleiden writes  
23 is -- the greeting is "Dear Pro-Life Leaders."  
24 Do you see that?  
25 A Yes, yes. I'm sorry. Yes.  
00135:01 Q You do? Okay, and the, the people to  
02 whom this list -- excuse me -- this email was sent  
03 include people from Americans United for Life,  
04 right?  
05 You see Charmaine Yoest there?  
06 A Yes, I do see Charmaine's name there.

38. PAGE 136:03 TO 136:06 (RUNNING 00:00:07.694)

03 Q Okay. There's Reverend Pavone from --  
04 the national director of Priests for Life.  
05 Do you see that?  
06 A Yes, I see his name.

39. PAGE 136:11 TO 136:17 (RUNNING 00:00:12.765)

11 Q Okay. There's Cheryl Sullenger from  
12 Operation Rescue, correct?  
13 A She's on here, yeah.  
14 Q Okay. Shawn Carney from 40 Days For  
15 Life.  
16 Do you see him?  
17 A I do see him.

40. PAGE 137:24 TO 138:16 (RUNNING 00:00:39.985)

24 Q Yeah, you had previously mentioned that,  
25 for example, prior to the release of a video, you  
00138:01 would circulate the -- a press release, that you  
02 would circulate the video, that there was some  
03 discussion about messaging with other pro-life  
04 organizations.  
05 Do you recall that testimony?  
06 A Yes, yes, yes. So, so if there were --  
07 so information before a video, this video, went  
08 out, obviously reached these people.  
09 Q Okay, and so I was just confirming that  
10 prior to the release of the video, there was,  
11 there was some coordination along the lines that  
12 you had just described with --  
13 A True.  
14 Q -- these or other pro-life



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15 organizations.  
16 A Accurate.

41. PAGE 146:11 TO 146:12 (RUNNING 00:00:07.265)

11 MR. KAMRAS: Okay. I'm going to  
12 mark as next in order, which is Exhibit 321.

42. PAGE 146:16 TO 146:17 (RUNNING 00:00:19.609)

16 Q This is an email string which is dated  
17 July 15, 2015, Bates-stamped CM20708 through 717.

43. PAGE 146:25 TO 147:23 (RUNNING 00:01:08.838)

25 Q Okay, and you'll see that this is  
00147:01 July 15, the day after the videos -- the first,  
02 excuse me, of the videos was released, and there's  
03 an email roughly in the middle of the page from  
04 Autumn Christensen --  
05 A Yes.  
06 Q -- at 12:52 p.m. Do you see that?  
07 A Yes, I see it.  
08 Q Okay. Do you know who Autumn  
09 Christensen is?  
10 A Yes.  
11 Q Who is Autumn?  
12 A Autumn is, is a pro-life sort of  
13 activist, but she worked on Capitol Hill for a  
14 while. I think during this period she was on  
15 Capitol Hill.  
16 Q Is -- Autumn worked with the Pro-Life  
17 Caucus; is that correct?  
18 A I think that's correct, yes.  
19 Q Okay, and the Pro-Life Caucus, if I  
20 understand correctly from Mr. Robbio yesterday, is  
21 a caucus of members of Congress who are pro-life;  
22 is that correct?  
23 A That's correct.

44. PAGE 150:14 TO 151:04 (RUNNING 00:00:59.929)

14 Q All right, and so was -- were you or CRC  
15 involved in working with members of Congress or,  
16 or other politicians prior to the release of this  
17 first video on July 14?  
18 A Most of our work was all publicity and  
19 media, so we, we're not, we're not a lobbyist, so  
20 we don't normally do work with anybody on the Hill  
21 in that regard in terms of lobbying or anything  
22 like that. Work product that we're involved with  
23 might find its way up to the Hill through others  
24 or we might send it out.  
25 Q You know, obviously I was communicating  
00151:01 with Autumn as, as -- I forget what her title was  
02 at the Pro-Life Caucus, but most of the work we do  
03 is more publicity driven, not trying to work  
04 legislation or anything like that.

45. PAGE 151:05 TO 151:13 (RUNNING 00:00:26.121)

05 Q Okay, but you, you did understand that  
06 the communications or the, the literature or other  
07 material that you provided to Ms. Christensen  
08 would end up with at least some members of the  
09 Pro-Life Caucus?  
10 A I don't know what she did with them when  
11 she got them, but I would assume that she would  
12 share certain bits of information with the members

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13 of her caucus.

46. PAGE 151:25 TO 152:21 (RUNNING 00:01:16.854)

25 Q And on -- and you said that most of your  
00152:01 work was with respect to media, and so what work  
02 did you or CRC do prior to the release of the  
03 first video to -- or with media in order to  
04 prepare them for the release of the media --  
05 excuse me -- of the videos?

06 A So our basic work before the -- you're  
07 asking what was the work that you would do before  
08 the video would be released?

09 Q Yeah, yeah.

10 A Okay. So our work would mostly be  
11 involved with -- David largely wrote the press  
12 releases, because he was the one that was most  
13 familiar with what the videos were, the content of  
14 them. We mostly would discuss how we were going  
15 to then get the videos out to the public and which  
16 media outlets, or would you specifically pick one  
17 or two journalists to give them to first, what's  
18 known in our industry as an "exclusive," or did we  
19 think we should just let them out and, and, and  
20 have the media react to them however they saw fit  
21 from a news standpoint.

47. PAGE 166:06 TO 166:07 (RUNNING 00:00:09.741)

06 Q Okay. Why would it be a problem if any  
07 of what Mr. Daleiden said had been wrong?

48. PAGE 166:11 TO 166:23 (RUNNING 00:00:33.559)

11 THE WITNESS: Okay. First of all,  
12 as a public relations professional, we have  
13 an obligation to make sure that information  
14 that's going out is, is based on some level  
15 of evidence, and we were very careful, if I  
16 recall, during this, to stick to what was  
17 found in his investigation on those videos,  
18 the things he found in his investigation  
19 based on those videos.

20 So I was always trying to be  
21 careful, the best of my recollection at the  
22 time, to be -- not to have any of this be  
23 speculative.

49. PAGE 167:11 TO 167:19 (RUNNING 00:00:26.860)

11 Q But we discussed earlier that you did  
12 not view the raw footage of the videos prior to  
13 the produced versions of the videos being  
14 released, correct?

15 A The best of my recollection, I did not  
16 sit through hours and hours of whatever video, raw  
17 video he had. I was mostly focused on him saying  
18 here is the stuff I'm going to publish, what do  
19 you think, and I give him my opinion.

50. PAGE 169:08 TO 170:01 (RUNNING 00:01:00.817)

08 Q All right, and just to be clear, what  
09 you, what you had that you were looking at was the  
10 produced versions of the videos that were going to  
11 be released publicly?

12 A That, that's my recollection, okay? I,  
13 I don't recall seeing a lot of footage beyond  
14 that, but I probably saw some.

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15 Q Okay.  
16 A One point I will make on that, though.  
17 All of the video footage -- most of the video  
18 footage that he got was published up afterwards.  
19 So in other words, they would go out with a five-  
20 to seven-, ten-minute video, whatever he was -- on  
21 any of these different sequences, and then after  
22 that was published, he would put, if I recall, the  
23 rest of the raw video largely up on the website,  
24 which, I might add, is more than a lot of news  
25 organizations do after they interview for 30  
00170:01 minutes.

51. PAGE 172:06 TO 172:14 (RUNNING 00:00:24.370)

06 Q I'm asking if --  
07 A -- as a PR professional?  
08 Q -- at the time, at the time when you  
09 were actually engaged in this project, what was  
10 your expectation about whether people were going  
11 to be more like -- once videos were released,  
12 whether people were going to be more likely to  
13 view the short produced versions of the videos or  
14 the long unedited versions of the videos.

52. PAGE 172:17 TO 174:04 (RUNNING 00:01:35.455)

17 THE WITNESS: So I think our -- my  
18 approach, my understanding of this was that  
19 we were trying to produce it very similar to  
20 how the news business goes about producing a  
21 report.  
22 You get, you get a lot of footage  
23 in your investigation. You can't use all of  
24 it, because you have to disseminate it in a  
25 reasonable way for the public to capture, and  
00173:01 that was basically what was done. It's very  
02 similar to how you would produce a short -- a  
03 longer form segment on a news program. So  
04 that was basically the expectations.  
05 Obviously, people are going to tend  
06 to review something in a shorter form than  
07 they are a longer form, but I think David was  
08 very adamant about always, I think, pretty  
09 sure, putting up information, the whole video  
10 so people could see that, journalists could  
11 look at it, and the public could see it, but  
12 the idea that you would shorten a video to,  
13 to get it out, just similar like the news  
14 media does when they do their reporting, was  
15 certainly the way, the way he went about it.  
16 BY MR. KAMRAS:  
17 Q Okay, and I appreciate that explanation,  
18 but what I heard in the middle of all that  
19 explanation was an agreement that people were more  
20 likely to view the short videos than the long  
21 unedited versions.  
22 A I think it's an accurate statement that  
23 people are going to see something in a shorter  
24 form than a longer form, and that might then pique  
25 their interest to go look at the longer form.  
00174:01 Q Okay, and, and that was your expectation  
02 at the time that these videos were released,  
03 correct?  
04 A I think that's a fair assessment.

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53. PAGE 224:16 TO 224:18 (RUNNING 00:00:12.207)

16 MR. KAMRAS: Okay. We're going to  
17 mark as next Exhibit 326, and this one I  
18 actually don't have another copy of.

54. PAGE 224:24 TO 225:12 (RUNNING 00:00:52.545)

24 Q All right. So this document which has  
25 been marked as Exhibit 326 is a two-page exchange  
00225:01 which is Bates-stamped CM07386 through 87, and it  
02 is dated in early May of 2015.  
03 Do you see that?  
04 A I do.  
05 Q Okay, and it begins with, on May 1, with  
06 Kellyanne Conway emailing Mr. Daleiden.  
07 Do you see that?  
08 A I, I do.  
09 Q And she says, "Dear Mr. Daleiden, thank  
10 you for contacting us with respect to your focus  
11 group needs," right?  
12 A I do see that, yes.

55. PAGE 227:14 TO 227:15 (RUNNING 00:00:07.864)

14 Q Okay. So now I'll have you look at what  
15 was previously marked as Exhibit 316.

56. PAGE 242:04 TO 242:06 (RUNNING 00:00:10.013)

04 Q So isn't that a yes, that you expected  
05 that the videos would generate negative publicity  
06 and reaction towards Planned Parenthood?

57. PAGE 242:15 TO 243:16 (RUNNING 00:01:14.746)

15 THE WITNESS: Our goal in the, in  
16 this whole thing was to take David's  
17 investigation, what he found, which pretty  
18 much is on those videos, and, and take it to  
19 the public and, and, and encourage the public  
20 to see what's happening with money that  
21 they're, as taxpayers, funding an  
22 organization, and that organization is  
23 engaging in -- and that, in our view, was in  
24 the public interest, and the fact that we  
25 would hopefully get members of Congress or  
00243:01 elected officials or policymakers to consider  
02 that information in the things they do daily  
03 as representatives was absolutely one of the  
04 goals.  
05 BY MR. KAMRAS:  
06 Q Okay, and I understand you, you keep  
07 talking about the goals, and what I actually asked  
08 you about was your expectation.  
09 And so isn't it true that your  
10 expectation is that in bringing this  
11 information -- that is, the videos -- to light,  
12 and in particular in doing so in swing states and  
13 key markets, as you put it, and targeting  
14 vulnerable Democrats, that you expected that these  
15 videos were going to generate negative publicity  
16 and attention for Planned Parenthood?

58. PAGE 243:21 TO 243:24 (RUNNING 00:00:07.093)

21 THE WITNESS: I don't think I  
22 expected that if people saw these, they would  
23 be excited about what was happening in

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24 Planned Parenthood clinics.

**59. PAGE 265:02 TO 265:03 (RUNNING 00:00:12.016)**

02 MR. KAMRAS: And I'm going to mark  
03 as next in line, which is Exhibit 330.

**60. PAGE 265:07 TO 266:03 (RUNNING 00:00:55.686)**

07 Q This is an article from the Judicial  
08 Crisis Network, or I should say it's a post from  
09 the Judicial Crisis Network.

10 Are you familiar with the Judicial  
11 Crisis Network?

12 A Yes, I am.

13 Q Okay. What is it?

14 A It is a judicial activist 501(c)(4)  
15 organization that gets involved in judicial  
16 issues.

17 Q And in -- you'll see that this is  
18 actually a press release, I guess, and it's dated  
19 January 9, 2017, and the contact for the press  
20 release is Peter Robbio.

21 Do you see that?

22 A Yes.

23 Q Okay, and do you know whether  
24 Mr. Robbio, in fact, worked on the campaign for  
25 the Judicial Crisis Network?

00266:01 A Yes. Peter was, was one of our  
02 executives that worked on -- comes in and out of  
03 the JCN operation.

**61. PAGE 269:07 TO 269:12 (RUNNING 00:00:17.820)**

07 Q Do you, do you consider yourself a,  
08 either a high-level GOP or a conservative campaign  
09 professional?

10 A I would say part of my 30-year career,  
11 it has involved working on conservative campaigns,  
12 so it's probably an accurate reflection.

**62. PAGE 277:09 TO 277:12 (RUNNING 00:00:10.261)**

09 Q In the third paragraph, it begins, "CRC  
10 Public Relations is a staple of the conservative  
11 public affairs ecosystem."

12 Do you agree with that statement?

**63. PAGE 277:17 TO 277:20 (RUNNING 00:00:11.643)**

17 THE WITNESS: "Is a staple of the  
18 conservative public affairs ecosystem." I  
19 mean we're a public relations firm that works  
20 with conservative groups and organizations.

**TOTAL: 1 CLIP FROM 1 DEPOSITION (RUNNING 00:34:30.247)**