

Videotaped Deposition of

Brett Morrow

July 07, 2023

Alliance of LA County Parents

vs.

County of LA Dept. of Public Health



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Brett Morrow

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

IN RE MATTER OF:)
)
ALLIANCE OF LOS ANGELES COUNTY)
PARENTS, an unincorporated)
association,)
)
Petitioner and Plaintiff,)
)
vs.)
)
COUNTY OF LOS ANGELES COUNTY)
DEPARTMENT OF PUBLIC HEALTH;)
MUNTU DAVIS, in his official)
capacity as Health Officer for)
the County of Los Angeles;)
BARBARA FERRER, in her)
official capacity as Director)
of the County of Los Angeles)
Department of Public Health;)
and DOES 1 through 25,)
inclusive,)
)
Respondents and Defendants.)
_____)

CASE NO. 22STCP02772

VIDEOTAPED DEPOSITION OF BRETT MORROW

HERMOSA BEACH, CALIFORNIA

Friday, July 7, 2023

Stenographically Reported by:
HEATHER J. BAUTISTA, CSR, CRR, RPR, CLR
Realtime Systems Administrator
California CSR License #11600
Oregon CSR License #21-0005
Washington License #21009491
Nevada CCR License #980
Texas CSR License #10725
Job No.: 10123094

1 VIDEOTAPED DEPOSITION of BRETT MORROW, taken
2 before Heather J. Bautista, CSR No. 11600, a Certified
3 Shorthand Reporter for the state of California, with
4 principal office in the county of Santa Clara,
5 commencing on Friday, July 7, 2023, 10:05 a.m., at 515
6 Pier Avenue, Hermosa Beach, California 90254.

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23 Senior Deputy County Counsel

24 ALSO PRESENT: Alan Hernandez, Videographer
25 Roxanne Hoge

Brett Morrow

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Friday, July 7, 2023

10:05 a.m.

--oOo--

THE VIDEOGRAPHER: We are on the record.
Today's date is July 7th, 2023. The time is 10:05 a.m.
Pacific Time. My name is Alan Hernandez. I represent
Aptus. I'm not financially interested in this action,
nor am I a relative or employee of any of the attorneys
or any of the parties. This video deposition is taken
at offices of Baker, Burton & Lundy located at 515 Pier
Avenue, Hermosa Beach, California 90254.

The name of the case is Alliance of the Los
Angeles County Parents versus County of Los Angeles
filed in the Superior Court of the State of California
for the County of Los Angeles. The case number is
22STCP02772.

This is the videotaped deposition of Brett
Morrow, and this deposition was noticed by Plaintiff's
attorney. Will all attorneys present please identify
yourselves and state who you represent for the record,
please.

MS. HAMILL: Good morning. Julie Hamill
appearing on behalf of Plaintiff and Petitioner,
Alliance of Los Angeles County Parents.

MR. McPHILLIPS: Blaine McPhillips, Senior

Brett Morrow

1 Deputy County Counsel representing County of Los Angeles
2 Department of Public Health.

3 MR. RAYGOR: Kent Raygor, Sheppard Mullin,
4 representing the defendants County of Los Angeles
5 Department of Public Health, Muntu Davis, M.D., and
6 Dr. Barbara Ferrer.

7 THE VIDEOGRAPHER: The court reporter today is
8 Heather J. Bautista representing Aptus. Will the
9 reporter please swear in the witness, and we can begin.

10 THE STENOGRAPHER: Good morning. My name is
11 Heather Bautista, and I am a certified stenographer
12 licensed by the State of California. My license number
13 is 11600.

14 This deposition and any transcript produced
15 therefrom will be handled pursuant to California Code of
16 Civil Procedure Section 2025.

17 As the deposition officer, I will be retaining
18 my duties and responsibilities under the Code.

19 Please raise your right hand so I can swear you
20 in.

21 BRETT MORROW,
22 having been first duly sworn, was examined and testified
23 as follows:

24 THE WITNESS: I do.

25 THE STENOGRAPHER: Thank you.

Brett Morrow

1 Please state your full name for the record.

2 THE WITNESS: Brett Morrow.

3 THE STENOGRAPHER: Thank you.

4 Counsel, you can begin.

5 MS. HAMILL: Thank you.

6 DIRECT EXAMINATION

7 BY MS. HAMILL:

8 Q. Good morning.

9 A. Good morning.

10 Q. Can you tell me, Mr. Morrow, what your current
11 occupation is.

12 A. I'm the chief communications officer for the
13 Department of Public Health in Los Angeles County.

14 Q. And how long have you held that position?

15 A. Officially a little over a year. I think it
16 was May 2022; May or April 2022.

17 Q. Did you start working with the County of Los
18 Angeles prior to May of 2022?

19 A. Correct, yes.

20 Q. In what capacity?

21 A. I was a contractor.

22 Q. A contractor.

23 A. Correct.

24 Q. And who was your employer at that time?

25 A. I think the name was SuperbTech.

Brett Morrow

1 Q. SuperbTech?

2 A. Correct, yes.

3 Q. Can you spell that for us, please.

4 A. S-u-p-e-r-b-t-e-c-h.

5 Q. S-u-b (sic)--

6 A. Like superb, and then tech, T-e-c-h.

7 Q. SuperbTech.

8 A. Correct, yes.

9 Q. And when did you begin working as a contractor
10 for L.A. County?

11 A. I believe that was November of 2019.

12 Q. November 2019.

13 A. Correct.

14 Q. Prior to November 2019, did you do any work for
15 the County of Los Angeles?

16 A. No.

17 Q. Okay.

18 Have you ever been deposed before?

19 A. No. First time.

20 Q. I'll go easy on you.

21 So you're under oath. Even though this
22 deposition is taking place in a law office, the
23 testimony you give today requires you to testify
24 truthfully under penalty of perjury. Do you understand
25 what that means?

Brett Morrow

1 A. Yes.

2 Q. I will try to make my questions as clear as
3 possible. But if, for any reason, you don't understand
4 a question, please ask me to clarify. If you do answer
5 a question, the assumption will be, and the record will
6 reflect, that you understood the question. Don't guess
7 or speculate. I'm entitled to your best estimate, but I
8 do not want you to guess or speculate.

9 MS. HAMILL: Good morning.

10 MS. HOGE: Good morning.

11 MS. HAMILL: This is Roxanne Hoge.

12 Q. (By Ms. Hamill) So I'm entitled to your best
13 estimates, but I do not want you to guess or speculate.
14 So if I were to ask you to estimate the length of this
15 room, you could do that, because you're sitting in this
16 room.

17 A. Um-hum.

18 Q. But if I were to ask you to estimate the length
19 of my patio table, you would have to guess or speculate,
20 because you've never been to my house, you have not seen
21 my patio table, nor do you know if one exists.

22 Only one person can speak at a time, so even if
23 you think you know what my question will be, please
24 allow me to finish before you begin your answer. The
25 court reporter can only write down what one person is

1 saying at a time, so let's try to go easy on her and not
2 speak over one another.

3 A. Understood.

4 Q. Use words and not gestures. Use "yes" or "no"
5 instead of "uh-huh," "huh-uh," or shake or a nod of the
6 head. Ask for a break if you need one at any time
7 during the deposition.

8 Your attorney may object to some of my
9 questions. If that happens, please pause and wait for
10 the objection before you answer. Unless your attorney
11 instructs you not to answer a specific question, you are
12 obligated to answer it, regardless of the objection. Do
13 you understand?

14 A. Yes.

15 Q. Okay.

16 Everything we say here will be taken down by
17 the court reporter. After the deposition is over, the
18 reporter will transcribe what we've said. If I ask you
19 the same questions later at trial that I've asked you
20 today and your answers change, I will be able to comment
21 on the differences, and one of the reasons will be to
22 question your truthfulness.

23 Is there any reason why you might be unable to
24 provide your best testimony today?

25 A. No.

Brett Morrow

1 **Q. Okay.**

2 MR. RAYGOR: Julie, could you answer the
3 question about whether Ms. Hoge is a member of Alliance
4 pursuant to the criteria in Paragraph 18 of your First
5 Amended Petition.

6 MS. HAMILL: You are more than welcome to take
7 Ms. Hoge's deposition, and you are more than welcome to
8 propound discovery specific to Ms. Hoge. I'm not going
9 to provide that information today.

10 For our purposes, why don't we act as if she is
11 a member of the public who I've invited to sit in on
12 this deposition, and if you have good cause or reason
13 why she should be excluded -- for example, if she is
14 presenting a threat or if she is causing some sort of
15 harm to your client -- then I'm happy to discuss that.
16 And then your recourse would be to seek a protective
17 order to exclude her from this deposition.

18 MR. RAYGOR: I understand. I'm just going by
19 what the judge said during the June 26th hearing; that
20 members of the public are not welcome to -- or entitled
21 to attend a deposition, just as you could walking in off
22 the street. So if she is a member, as a member that as
23 you've specified in Paragraph 18 of your First Amended
24 Petition, which was stated under penalty of perjury, if
25 she meets those conditions, fine; she can attend. But

Brett Morrow

1 if not, then she's not entitled to attend. I'm not
2 going to kick her out, but I would like an answer to
3 that question. It's pretty straightforward.

4 MS. HAMILL: Okay.

5 I'm not going to answer the question. Again,
6 you can engage in your own discovery. I'm going to
7 proceed -- I'm going to proceed with the deposition. If
8 you would like to move for protective order to exclude
9 her, you may do that.

10 MR. RAYGOR: You know, we do have discovery
11 outstanding to you that you haven't responded to to
12 identify your members, and in particular I thought that
13 you had agreed to identify the members with authority,
14 and the founding members of which --

15 MS. HAMILL: If you're finished, I would like
16 to proceed with my deposition of Mr. Morrow.

17 MR. RAYGOR: I'm not quite finished. Almost.

18 But you haven't yet responded to that, provided
19 that information; so yes, we'll let the Court decide
20 whether or not it was proper to have her attend today.

21 MS. HAMILL: Okay.

22 **Q. (By Ms. Hamill) Did you review any documents**
23 **in preparation for your deposition today?**

24 A. A few, yes.

25 **Q. Which documents did you review?**

1 A. I refreshed my memory on the e-mails that were
2 provided, and I perused --

3 (Stenographer clarification.)

4 THE WITNESS: -- Dr. Ferrer's transcript.

5 MR. RAYGOR: If you just keep your voice up a
6 little bit. You kind of drop off at the end of
7 sentences.

8 THE WITNESS: I apologize. I'll do my best.

9 MR. RAYGOR: She will --

10 THE WITNESS: Kick me under the table.

11 **Q. (By Ms. Hamill) Okay.**

12 **So you said you reviewed some of the e-mails**
13 **that were produced?**

14 A. Yes.

15 **Q. You reviewed the transcript of Barbara Ferrer's**
16 **deposition?**

17 A. Correct.

18 **Q. Is there anything else that you reviewed?**

19 A. Probably the video, as well, which was --
20 (Stenographer clarification.)

21 THE WITNESS: The video, as well, of her
22 deposition too.

23 **Q. (By Ms. Hamill) The video of the deposition of**
24 **Barbara Ferrer.**

25 A. Correct, yes.

Brett Morrow

1 Q. Okay.

2 Anything else that you can think of that you
3 reviewed in preparation --

4 A. No, not that I can recall.

5 MR. RAYGOR: Again, sorry. Wait till she
6 finishes the question. You're kind of jumping over it,
7 and it makes it really hard for the court reporter to
8 take down who's talking if people talk at the same time.
9 It's very hard.

10 THE WITNESS: I'm sorry. I will do my best.

11 MS. HAMILL: It will get easier, I promise, as
12 the day goes on.

13 I'm going to have marked as Exhibit No. 1 the
14 Alliance of Los Angeles County Parents Amended Notice of
15 Taking Deposition of Brett Morrow and Demand to Produce
16 Documents at Deposition.

17 (Exhibit 1 marked for identification.)

18 MR. RAYGOR: You're going to be given the
19 exhibits by the court reporter. Just hold on to them.
20 At the end of the day, we'll give them back to the court
21 reporter who will keep them with the transcript. I'll
22 have a copy that we can look at later if you need to.

23 THE WITNESS: I understand.

24 Q. (By Ms. Hamill) Have you seen this document
25 before?

Brett Morrow

1 A. Yes, I believe so.

2 Q. And --

3 A. Yes.

4 Q. -- I will direct your attention to Page 1,
5 where it says Request for Production of Documents down
6 at Line 23, and that begins with Number 1 and continues
7 all the way through Page 4 to Number 25. These are all
8 requests for production of documents. Did you review
9 these requests?

10 A. Yes.

11 Q. And did you conduct a search for all of the
12 documents requested?

13 A. Yes, I did.

14 Q. And I'm going to assume that all of those
15 documents have been provided prior to today; is that
16 correct?

17 MR. RAYGOR: Objection. Calls for speculation
18 as to what you assumed or whether that's correct.

19 Q. (By Ms. Hamill) You may answer.

20 A. Yes.

21 MS. HAMILL: Okay.

22 And, Counsel, are you bringing -- have you
23 provided any other documents today that are responsive
24 to these requests?

25 MR. RAYGOR: My name is not "Counsel"; it's

Brett Morrow

1 "Kent" or "Mr. Raygor"; whichever you prefer. But I
2 have not brought any additional documents to produce
3 today.

4 MS. HAMILL: Okay.

5 Q. (By Ms. Hamill) And your counsel did provide a
6 privilege log on Wednesday, I believe, July 5th.

7 Have you reviewed that privilege log?

8 A. Yes.

9 Q. Okay. All right.

10 We will get back to this later. Thank you very
11 much.

12 So I want to get back to your current role.
13 You are currently the communications chief for the
14 County of Los Angeles Department of Public Health;
15 correct?

16 MR. RAYGOR: Asked and answered.

17 THE WITNESS: Chief Communications Officer --

18 Q. (By Ms. Hamill) Chief Communications --

19 A. Communications --

20 (Unreportable cross-talk.)

21 (Stenographer clarification.)

22 THE WITNESS: Correct.

23 MR. RAYGOR: Again, try not to talk over each
24 other.

25 Q. (By Ms. Hamill) And when you were a contractor

1 with SuperbTech, did you have a title with the County of
2 Los Angeles?

3 A. I did, yes.

4 Q. What was your title?

5 A. Director of Communications.

6 Q. Director of Communications --

7 MR. RAYGOR: Asked and answered.

8 Q. (By Ms. Hamill) -- for the Los Angeles County
9 Department of Public Health.

10 MR. RAYGOR: Asked and answered.

11 THE WITNESS: Yes.

12 Q. (By Ms. Hamill) Okay.

13 So I just want to be very clear. From May 2022
14 to the present, your role is as an employee of the
15 County as Chief Communications Officer; and from
16 November 2019 to May 2022, you were a contractor with
17 SuperbTech, and your title was Director of
18 Communications.

19 A. Correct. A contractor with Department of
20 Public Health.

21 Q. Got it. Thank you very much.

22 So how did you first become the Director of
23 Communications for Public Health for L.A. County in
24 2019?

25 A. I had responded to a job listing.

Brett Morrow

1 Q. And the job listing was through the County of
2 Los Angeles?

3 A. I believe so, yes.

4 Q. And did you apply as an individual, or did you
5 apply through SuperbTech?

6 MR. RAYGOR: Objection. Compound.

7 THE WITNESS: I applied as an individual.

8 Q. (By Ms. Hamill) As an individual. In 2019?

9 A. Yes.

10 Q. And so when you were hired on, the County hired
11 you through the contractor SuperbTech?

12 A. Correct.

13 Q. Okay.

14 And so SuperbTech is a contractor for L.A.
15 County.

16 MR. RAYGOR: Objection. Vague as to time.

17 THE WITNESS: I'm not quite sure how that
18 works, but I believe so, yeah. It's -- we were able to
19 bring me on as a contractor through SuperbTech, yes.

20 Q. (By Ms. Hamill) Okay.

21 I'm just trying to -- it's a unique employment
22 relationship, and so I'm trying to understand the
23 dynamics. So it sounds -- and correct me if I'm wrong.

24 Sounds like in November of 2019, you applied to
25 a job listing for communications director for L.A.

1 County Department of Public Health, and you were hired,
2 but not as an employee; as a contractor through
3 SuperbTech.

4 A. Correct.

5 Q. Okay. Thank you.

6 And were you recruited by anyone to that
7 position in 2019?

8 A. I was not.

9 Q. Were you referred by anyone in 2019?

10 A. No.

11 Q. Did anyone provide you with references or
12 letters of recommendation for that position in 2019?

13 A. I don't recall.

14 Q. Did you interview for that job in 2019?

15 A. I did, yes.

16 Q. With whom did you interview?

17 A. There were many interviews. I can't remember
18 all of the names, but Dr. Ferrer. There were several
19 other people. I believe Megan McClaire was in one.
20 Noel Barakat was in one. Stella Fogleman was in
21 another -- or they may have been in the same, as well.
22 I think that's all I can remember for now.

23 Q. Were any of the members of the Board of
24 Supervisors part of those interviews?

25 A. No.

Brett Morrow

1 Q. Did you have a personal relationship with
2 anyone at the County of Los Angeles prior to getting
3 this role in 2019?

4 A. I had a friend who had worked in a Board
5 office.

6 Q. A friend who worked in a board of supervisor
7 office?

8 A. Correct, yes.

9 Q. Which supervisor?

10 A. Janice Hahn.

11 Q. And who is the friend?

12 A. Elizabeth Odendahl.

13 Q. Can you spell the last name, please.

14 A. I'll try. I believe it's O-d -- there may be
15 an H in there -- e-n-h-a-l [sic].

16 Q. Thank you.

17 And were you employed prior to November 2019?

18 A. I was, yes.

19 Q. What was your job?

20 A. I was the Director of Communications for
21 Ticketmaster.

22 Q. For Ticketmaster.

23 A. Correct.

24 Q. And how long did you hold that position?

25 A. A little over two years.

Brett Morrow

1 Q. So approximately 2017 to 2019?

2 A. I believe September 2017 until November 2019.

3 Q. And were you employed prior to 2017 anywhere
4 else?

5 A. I was.

6 Q. Where were you employed prior to your job at
7 Ticketmaster?

8 A. The United States House of Representatives.

9 Q. What was your position?

10 A. Director of Communications, and I held other
11 additional titles for different positions that I held
12 while working for the House.

13 Q. So you were the Director of Communications for
14 the United States House of Representatives?

15 A. I apologize. To clarify, worked for a member
16 of the United States House of Representatives; not
17 specifically the House itself.

18 Q. Which member?

19 A. I worked for several. Just previously to -- to
20 working for Ticketmaster, I worked for Representative
21 Keith Ellison from Minneapolis, Minnesota.

22 Q. And prior to Mr. Ellison?

23 A. Mark Takano from Riverside, California.

24 Q. And prior to Mr. Takano?

25 A. Adam Schiff from Glendale and Pasadena,

Brett Morrow

1 California.

2 **Q. How long did you work for Mr. Schiff?**

3 A. Well, I worked his campaign in 2010, so that
4 was maybe several months in the lead-up to the campaign.
5 And then I began working as an intern in his D.C. office
6 in August, and then worked there for a couple of months.
7 At one time, he had brought me on as an official
8 employee, I think, in September or October.

9 **Q. Of 2010?**

10 A. I'm sorry, 2012.

11 **Q. 2012.**

12 A. 2012. So I worked his campaign in 2010, and
13 then in 2012 -- August of 2012, approximately, he
14 brought me out to D.C. to work as an intern and
15 eventually got hired on several months later.

16 **Q. Okay.**

17 **And how long did you work in his office in**
18 **D.C.?**

19 A. A few months.

20 **Q. A few months.**

21 A. A few months; correct.

22 **Q. And so immediately following your role at**
23 **Mr. Schiff's office, you then worked for Mr. Takano's**
24 **office?**

25 A. Correct. Mr. Takano had been elected in

Brett Morrow

1 November of 2012, so then I helped start his office, as
2 he was --

3 (Stenographer clarification.)

4 THE WITNESS: A freshman member at the time.

5 **Q. (By Ms. Hamill) And how long did you work for**
6 **Mr. Takano?**

7 A. So that would be January of 2013 until, I want
8 to say, August or September of 2015, so a little more
9 than two and a half years.

10 **Q. And then you moved to Mr. Ellison's office?**

11 A. Correct.

12 **Q. And how long did you work for Mr. Ellison's**
13 **office?**

14 A. Around two years as well.

15 **Q. I just missed you in D.C. I was in D.C. until**
16 **2010. Okay. Let's see.**

17 **Were you involved in any committee work for any**
18 **of the congressmen's offices that you just mentioned?**

19 A. No. They have committee staff who staffs the
20 committee work and all the legislation. I worked in the
21 personal offices.

22 **Q. In the personal offices.**

23 A. Correct.

24 **Q. As communications director.**

25 A. Correct.

Brett Morrow

1 **Q. And what were your duties as communications**
2 **director for these congressmen?**

3 A. Develop communication strategies, you write
4 press releases, staff media interviews, book or pitch
5 media interviews, develop social media posts, take
6 photography, do graphic design. You're basically a
7 one-man show, so it's -- you do a little bit of
8 everything.

9 **Q. Did you do any crisis or reputation management?**

10 A. I would say yes, yes.

11 **Q. And what did that involve?**

12 A. Specifically crisis or reputation management?

13 **Q. Let's start with crisis management.**

14 A. The one that sticks out is there was a shooting
15 in one member's home district, and so there was a lot of
16 pressing media needs that happened, so it involved
17 booking Representative Ellison on media interviews,
18 meeting with community members, communicating on social
19 media, writing press releases; things of that nature.

20 **Q. So you developed relationships with the media**
21 **during this time; is that correct?**

22 A. Correct, yes.

23 **Q. And would that include traditional media, such**
24 **as local news channels?**

25 A. Yes.

Brett Morrow

1 Q. Yes? Any other type of media?

2 A. Digital media as well. Radio.

3 Q. And then what about reputation management?

4 A. A little here or there, yeah.

5 Q. And what did that entail?

6 A. If there was negative stories about one of my
7 bosses -- I should say just one boss -- that I had to
8 deal with this with, you'd think of strategies to either
9 put out, you know, the information or the message frame
10 that we wanted to put out or clarify information that
11 was out there as well.

12 Q. All right.

13 Is there a specific example you have in mind of
14 a member for whom you did this for?

15 A. Keith Ellison.

16 Q. Keith Ellison. Can you explain what happened?

17 A. He was running for the chair of the --
18 (Stenographer clarification.)

19 THE WITNESS: -- DNC. Sorry. Democratic
20 National Committee. And there were a lot of negative
21 stories about him, about parking tickets and things of
22 that nature, yeah.

23 Q. (By Ms. Hamill) Horrifying.

24 A. Yeah, and other things.

25 Q. What did you do to respond to that and to frame

Brett Morrow

1 the story?

2 A. I think the thing we did most was we did a --
3 like, a blog post from him, kind of sharing his
4 perspective on some of these items that were coming up.

5 Q. Was there anything else that you did?

6 A. I'm sure. I don't recall more.

7 Q. Did you try and have stories placed with media
8 outlets that were positive?

9 A. Yes. That's part of just general
10 communications work for a elected official.

11 Q. Did you try and kill any stories?

12 A. Not that --

13 MR. RAYGOR: Objection. Vague and ambiguous as
14 to what you mean by "kill."

15 THE WITNESS: Perhaps maybe once or twice. I'm
16 not very good at it.

17 Q. (By Ms. Hamill) And let's -- I am not in the
18 communications space, so I may misuse the terminology
19 that people in your field use. Do you understand what I
20 mean when I say "kill a story"?

21 A. Yes.

22 Q. What does that mean?

23 A. To attempt to persuade a writer that the story
24 isn't valid or that it's wrong or that it doesn't --
25 there's no benefit to the story.

Brett Morrow

1 Q. And have you ever successfully killed a story
2 in your role as communications director for any
3 employer?

4 A. Not that I can recall. It's also not something
5 I generally like to do.

6 Q. Why not?

7 A. I think we -- the press and whoever I'm working
8 for have different roles as well, so it's just something
9 I don't enjoy doing.

10 Q. Were you ever involved in any work for any of
11 these three congressmen with respect to the
12 Communications Decency Act or Section 230?

13 A. I don't know exactly what that is.

14 Q. Okay.

15 Move on from that. Did you attend college?

16 A. I did, yes.

17 Q. Where did you attend college?

18 A. I attended several colleges.

19 Q. Which ones?

20 A. I attended Fullerton Junior College; I attended
21 Cal State Fullerton; Pasadena City College; Rio Hondo
22 College; Los Angeles Valley College; and I graduated
23 from Cal State University, Los Angeles. I think that's
24 all of them.

25 Q. And what was your degree in from Cal State,

Brett Morrow

1 **Los Angeles?**

2 A. Political science, and I had a minor in
3 economics.

4 **Q. Did you pursue any advanced degrees?**

5 A. No.

6 **Q. Who is your direct supervisor at the Los**
7 **Angeles County Department of Public Health?**

8 A. Megan McClaire.

9 **Q. Megan McClaire. Has she been your direct**
10 **supervisor for the entire time that you've worked for**
11 **the County?**

12 A. No.

13 **Q. Who has -- who was your supervisor prior to**
14 **Ms. McClaire?**

15 A. Carl Kemp.

16 **Q. Carl Kemp.**

17 MR. RAYGOR: Asked and answered.

18 **Q. (By Ms. Hamill) What time period was Mr. Kemp**
19 **your supervisor?**

20 A. November of 2019 when I came on until, I
21 believe, the end of June of 2020.

22 **Q. End of June 2020.**

23 A. Correct.

24 MR. RAYGOR: Asked and answered.

25 **Q. (By Ms. Hamill) Has anyone else served as your**

Brett Morrow

1 supervisor at the County of L.A.?

2 A. No.

3 Q. And who reports to you in your role as Chief
4 Communications Officer?

5 A. The communications team.

6 Q. The communications team. How many --

7 MR. RAYGOR: Asked and answered.

8 Q. (By Ms. Hamill) How many employees are on that
9 team?

10 A. As of today, I believe it is nine. I believe
11 it's nine. Seven to ten.

12 Q. And are those approximately nine or seven to
13 ten people employees of the County, or are they
14 contractors?

15 A. Employees of the County.

16 Q. Okay.

17 And does anyone else report to you in your role
18 as Chief Communications Officer?

19 A. I'm not sure I understand the --

20 Q. Do you oversee any contractors for the County?

21 A. Oh. So there's currently one contractor who
22 we -- who I still oversee, yes.

23 Q. And who is that?

24 A. Christine Bradic.

25 Q. And what company does she work for?

Brett Morrow

1 A. Fraser Communications.

2 Q. And what is her role?

3 A. She writes talking points for Dr. Ferrer.

4 Q. Does she do anything else?

5 A. She assists in the development of our press --
6 our COVID press releases as well. And there may be
7 other things as they come up as well.

8 Q. And did you hire Ms. Bradic?

9 A. I did not.

10 Q. Were you involved in the hiring of Ms. Bradic?

11 A. I was, yes.

12 Q. When did that occur?

13 A. I want to say maybe fall of next -- I'm
14 sorry -- of last year. I don't remember the exact
15 months. I apologize.

16 Q. So approximately fall of 2022?

17 A. Correct, yeah. Maybe September or October.

18 Q. And had the County Department of Public Health
19 worked with Fraser Communications prior to that?

20 A. Yes.

21 Q. In what capacity?

22 A. They were a contracted agency with us.

23 Q. What does that mean?

24 A. They apply for contracts to assist in the
25 development of assets, materials, in our communication

Brett Morrow

1 strategies.

2 Q. In your communications strategy.

3 MR. RAYGOR: Asked and answered.

4 Q. (By Ms. Hamill) And I'm repeating these words
5 just because with the mask and with the trailing off I
6 want to make sure I'm understanding and hearing you, and
7 I also want to make sure that our court reporter is
8 hearing you.

9 MS. HAMILL: How are you doing? Okay. All
10 right.

11 Q. (By Ms. Hamill) So in your current role as
12 Chief Communications Officer, what are your goals and
13 objectives, generally?

14 A. I would say to further the mission of the
15 Department of Public Health.

16 Q. And in your opinion, what is that mission?

17 A. Typically, it's thought of as to increase or
18 improve the well-being -- the health and well-being of
19 residents in Los Angeles County.

20 Q. Is there anything else that you see as your
21 objective or goal in your position?

22 A. This is just my personal opinion, but it's also
23 to communicate to and provide information to some
24 residents who may not have access to this information or
25 be aware of certain supports or resources.

Brett Morrow

1 Q. So outreach?

2 A. Correct, yes.

3 Q. Do you do any crisis or reputation management
4 for anyone in the County Department of Public Health?

5 A. Crisis, yes. Reputation, no.

6 Q. Can you explain what you do in a context of
7 crisis management.

8 A. So in the case of COVID, it is similar to my
9 crisis -- prior crisis communications experience; you're
10 dealing with whatever the issue is -- the incidents.
11 You're writing press releases; you're trying to take
12 information from our leadership and disseminate it out
13 into the public to provide the information that the
14 residents may need through a variety of different
15 strategies and tactics, and part of that is determining
16 the best or most effective strategies or tactics for the
17 specific community or population.

18 Q. And what strategies and tactics have you
19 specifically used in L.A. County?

20 A. Press conferences, press releases, social
21 media, various others, I'm sure, but those are the
22 primary ones and the quickest ones, as well, which is
23 important in times of crisis.

24 Q. Do you see COVID as something that is still a
25 crisis today or has the crisis period dissipated, in

1 **your opinion?**

2 (Stenographer clarification.)

3 MR. RAYGOR: Objection. Lacks foundation as
4 within his expertise.

5 THE WITNESS: I'm not quite sure how to answer
6 that. I think there is a technical definition about
7 crisis or pandemic, and I don't know exactly what that
8 is or how to define that.

9 **Q. (By Ms. Hamill) I guess in the context of your**
10 **role, does COVID still require crisis communications?**

11 MR. RAYGOR: Vague and ambiguous as to
12 "crisis."

13 THE WITNESS: It's definitely less timely, I
14 would say. I think, technically, it's still -- I was
15 going to say it may still be an emergency but I don't --
16 I don't believe that's true; I think that was rescinded
17 as well, so it's less timely, I would say, than in 2020
18 when it was full-blown crisis.

19 **Q. (By Ms. Hamill) Can you please tell me the**
20 **name of your supervisor again. Mc --**

21 A. McClaire.

22 **Q. McClaire. Thank you. Okay.**

23 **So are there certain benchmarks that you have**
24 **to meet that Ms. McClaire has set for you?**

25 A. In --

Brett Morrow

1 **Q. As your supervisor.**

2 A. In terms of -- I'm not sure --

3 **Q. Of job performance. Does she sort of direct**
4 **what you need to do in your role as Chief Communications**
5 **Officer?**

6 A. There are -- yes, there are metrics for job
7 performance, yes.

8 **Q. And what are those metrics?**

9 A. I don't know all of them. Some of them may be
10 something as simple as increasing the number of press
11 releases we put out in Spanish; promoting a specific
12 number of events of -- events in each supervisorial
13 district or certain communities that don't have a lot of
14 health -- public health events in them; things of that
15 nature.

16 **Q. Okay.**

17 **So when the Department of Public Health issues**
18 **a public statement to the media, does Dr. Ferrer review**
19 **that statement before it's released?**

20 MR. RAYGOR: Objection. Calls for speculation.
21 Lacks foundation.

22 THE WITNESS: Typically, yes.

23 **Q. (By Ms. Hamill) Typically, yes?**

24 MR. RAYGOR: Asked and answered.

25 **Q. (By Ms. Hamill) In what -- in what context**

Brett Morrow

1 would she not review it?

2 A. If she's out.

3 Q. And if she is out, is there someone else who
4 would review it?

5 A. Yes.

6 Q. Who would that be?

7 A. Dr. Muntu Davis.

8 MR. RAYGOR: M-u-n-t-u.

9 Q. (By Ms. Hamill) So during the state of
10 emergency for COVID, which ended March 31st of this
11 year, did you monitor any local news outlets to see how
12 they were covering COVID?

13 MR. RAYGOR: Objection. Lacks foundation as to
14 when it ended.

15 THE WITNESS: I'm sorry. Can you repeat the
16 question.

17 Q. (By Ms. Hamill) Sure. During the state of
18 emergency for COVID, which ended March 31st, 2023, did
19 you monitor local news outlets to see how they were
20 covering COVID?

21 MR. RAYGOR: Same objection.

22 THE WITNESS: During the pandemic, yes.

23 Q. (By Ms. Hamill) Yes?

24 A. Yes.

25 Q. Which media outlets did you monitor?

Brett Morrow

1 A. I would say almost all of the local media
2 outlets and some national as well.

3 Q. Can you list the local outlets that you
4 monitored.

5 A. Sure. Los Angeles Times, Los Angeles Daily
6 News, CBS, NBC, ABC, Fox 11, Spectrum, and I'm sure
7 there are others as well. KFI, KPCC, KNX -- those are
8 the -- Telemundo, Univision. Those are the main ones.

9 Q. Do you speak Spanish?

10 A. A little bit.

11 Q. And when you were monitoring those local news
12 outlets for their COVID coverage, what did that entail
13 on your end?

14 A. Really just seeing how they were reporting on
15 it. Seeing the sentiment of the reporting.

16 Q. And what would you do if you didn't agree with
17 the reporting?

18 A. Rarely anything.

19 Q. Rarely anything.

20 MR. RAYGOR: Asked and answered.

21 Q. (By Ms. Hamill) Did you ever provide any
22 feedback to local news outlets regarding how they
23 covered COVID?

24 A. I'm sure several times, yes.

25 Q. Can you recall a specific example?

Brett Morrow

1 A. I think there was one instance -- I want to say
2 it was Los Angeles Daily News. I believe it was Ryan
3 Carter who wrote a story, and there was several quotes
4 that were being interchanged, flipping from an
5 individual and then flipping to Dr. Davis, and the
6 writing wasn't clear, so people were understanding the
7 quote from the other individual to be from Dr. Davis, so
8 I contacted him and informed him of that, and he made
9 that -- he made it more clear.

10 I think the articles eventually said, like, "He
11 said," instead of the actual name, so people were taking
12 it as Dr. Davis saying that specific quote when he
13 hadn't.

14 **Q. Okay.**

15 **And so in that instance, the L.A. Daily News**
16 **issued a correction pursuant to your guidance?**

17 MR. RAYGOR: Objection. Calls for speculation.

18 THE WITNESS: I can't remember if he just
19 changed the wording on it or actually put a correction
20 notation on it. I don't recall which, but it was
21 clarified.

22 **Q. (By Ms. Hamill) Okay.**

23 **Did you ever ask any news outlets to retract a**
24 **story?**

25 A. Not that I can recall.

1 Q. Did you ever ask any news outlets to remove a
2 story from the Internet?

3 A. Not that I can recall.

4 MS. HAMILL: I'm going to have marked as
5 Exhibit 2 an article -- an opinion article from the
6 Southern California News Group.

7 (Exhibit 2 marked for identification.)

8 Q. (By Ms. Hamill) And this article is entitled
9 "Bringing Back a Mask Mandate in Los Angeles County is
10 Unjustified," and it was published July 22, 2022.

11 Do you recall seeing this article?

12 A. I --

13 MR. RAYGOR: Whenever you're given an ar- -- a
14 document, you're entitled to read it, if you need to,
15 the whole thing.

16 Q. (By Ms. Hamill) Yes. Feel free to take your
17 time, and you don't -- if you want to take time to read
18 the entire thing before I ask you any questions, that's
19 perfectly fine with me.

20 A. I -- I remember this article, yes.

21 Q. Do you recall contacting the Southern
22 California News Group to ask them to take this story
23 offline?

24 A. I remember them -- contacting them. I don't
25 believe I -- I don't believe I asked them to take it

Brett Morrow

1 offline. I believe I asked for a correction, if I
2 remember correctly.

3 **Q. And what did you want to have corrected? Take**
4 **your time. There's no need to rush through this.**

5 A. I can't remember the specific feedback I was
6 providing or the correction I was asking for, but I
7 believe it had to do something with the information on
8 hospitalizations.

9 **Q. Can you tell me which paragraph you're**
10 **referring to. Which page?**

11 A. On the second page, it may have been in
12 Paragraph 2, 3, or 4, but I don't recall perfectly.

13 **Q. Are you concerned that this particular article**
14 **still remains online?**

15 A. Not at this time, no.

16 **Q. Not at this time. Why not?**

17 A. Because very few people read articles from more
18 than a year ago, I think, at this point.

19 MR. RAYGOR: Belated objection. Lacks
20 foundation it still remains online.

21 **Q. (By Ms. Hamill) So at the time that you**
22 **reached out to the Southern California News Group, you**
23 **had concerns, to your recollection, about the**
24 **information included in Paragraphs 2, 3, and 4 on the**
25 **second page of this document.**

1 MR. RAYGOR: Objection. Mischaracterizes his
2 testimony.

3 Q. (By Ms. Hamill) If I've mischaracterized your
4 testimony, please correct me.

5 A. I can't remember exactly what you said. I
6 apologize.

7 Q. I just want to be clear on what specifically
8 you found objectionable within this document that led
9 you to reach out to the Southern California News Group
10 to ask for correction.

11 MR. RAYGOR: Asked and answered.

12 THE WITNESS: If I recall correctly, it was the
13 paragraphs about hospitalizations.

14 Q. (By Ms. Hamill) And what specifically about
15 hospitalizations did you take issue with?

16 MR. RAYGOR: Asked and answered. Calls for
17 speculation.

18 THE WITNESS: I can't recall specifically what
19 the issue was with this article.

20 Q. (By Ms. Hamill) Is there anything that would
21 refresh your memory?

22 A. I think, unfortunately, the -- the
23 correspondence that I did have -- and I believe it was
24 with Saul Rodriguez, who's the editor for the opinion
25 section for the Los Angeles Daily News -- was a phone

Brett Morrow

1 call, and I think it was in the evening as I was picking
2 up food, so --

3 **Q. That's a very specific memory.**

4 A. It hasn't happened ever before or after.

5 **Q. What hasn't happened before?**

6 A. Having to speak to a reporter so late after
7 hours while I was picking up food, yeah, so that memory
8 sticks out.

9 **Q. And so this must have been very important to**
10 **you if you reached out after hours to a reporter while**
11 **you were picking up food.**

12 MR. RAYGOR: Objection. Vague and ambiguous as
13 to "very important."

14 THE WITNESS: I believe I reached out to him
15 before -- before the end of the day, and then he hadn't
16 replied until after hours, and then that's when we
17 discussed.

18 **Q. (By Ms. Hamill) Do you recall the context of**
19 **the conversation?**

20 A. Not specifically, but I remember us going back
21 and forth about certain issues with the reporting. If I
22 recall correctly, he understood my issues and said he
23 was going to take it back to either someone on his team
24 or the authors.

25 **Q. And do you recall any corrections being made**

Brett Morrow

1 following that phone call?

2 A. I don't recall. I believe I followed up with
3 him, and I don't think I heard back from him.

4 Q. Did you contact any of the authors? Their
5 names are listed on the last page as well as the first
6 page.

7 A. I don't believe I did.

8 MS. HAMILL: And for the record, the authors
9 are Scott Balsitis, Jeffrey Klausner, Houman Hemmati,
10 and Neeraj Sood.

11 Q. (By Ms. Hamill) In your role as Communications
12 Chief -- and I mean from 2019 to the present, so I know
13 your title has changed from Director to Communications
14 Chief -- have you ever tried to kill a story to ensure
15 that the Department of Public Health would be reflected
16 in a positive light?

17 MR. RAYGOR: Asked and answered.

18 THE WITNESS: Not that I recall.

19 Q. (By Ms. Hamill) Do you generally correspond
20 with news outlets via telephone?

21 A. No.

22 Q. What is your practice?

23 A. I'm best on e-mail.

24 Q. E-mail?

25 MR. RAYGOR: Asked and answered.

Brett Morrow

1 Q. (By Ms. Hamill) Did you ever brief Dr. Ferrer
2 on what people were saying on social media regarding the
3 health orders?

4 A. There were many health orders. Not that I
5 recall.

6 Q. Did you ever discuss with Ms. McClaire what
7 people were saying on social media regarding the health
8 orders?

9 A. Not that I recall.

10 Q. Is it Ms. McClaire or Dr. McClaire?

11 A. Ms. McClaire. I don't believe she has a Ph.D.

12 MR. RAYGOR: Ph.D.?

13 THE WITNESS: Ph.D. Sorry.

14 Q. (By Ms. Hamill) Did you ever brief any members
15 of the Board of Supervisors on what people were saying
16 about the Department of Public Health on social media?

17 A. No.

18 Q. Do you have any relationships with any of the
19 members of the Board of Supervisors?

20 MR. RAYGOR: Vague as to time.

21 THE WITNESS: No.

22 Q. (By Ms. Hamill) Do you have --

23 A. I apologize. What do you mean by
24 relationships?

25 Q. Do you speak with any of the members of the

1 Board of Supervisors at any point in time from 2019 to
2 the present?

3 A. I have spoken with several of them, yes, at
4 events that were coordinating, like -- yes.

5 Q. Which ones?

6 A. I've spoken with Supervisor Solis,
7 Supervisor Mitchell. I don't believe I've spoken to
8 the others.

9 Q. And what do you discuss with Supervisor Solis
10 and Supervisor Mitchell?

11 A. Typically, it was, "Hey, we're going to get
12 started with this event. You're going to go on this
13 specific time. Here's the speaking order of the
14 panelists or the speakers." It's logistical, mostly.

15 Q. So standard Communications Chief stuff.

16 A. Correct.

17 Q. Okay.

18 Did you discuss with anyone else in the County
19 Department of Public Health what people were saying on
20 social media about the health orders?

21 A. Not that I can recall.

22 Q. Did you discuss with anyone within the County
23 what people were saying on social media about the public
24 health orders?

25 A. Not that I can recall.

Brett Morrow

1 Q. Who runs the Department of Public Health social
2 media accounts? And to be clear, when I talk about
3 social media accounts, I'm talking about Facebook,
4 Instagram, Twitter.

5 A. The communications team.

6 Q. And those are the seven to ten people who are
7 employed by the County under your supervision.

8 A. Correct, yes.

9 Q. And does that also include Fraser
10 Communications?

11 A. Can you clarify what you mean by management, I
12 guess.

13 Q. Well, that's a good question for you. So what
14 does it mean to run a social media account for the
15 Department of Public Health?

16 A. I consider running the social media account the
17 administrative portion of it, doing the actual posting
18 of content.

19 Q. And so the posting of content on social media
20 is done by those employees within the communications
21 team?

22 A. Primarily, yes.

23 Q. Primarily. And who else is involved in running
24 the accounts?

25 A. If people were out sick or somebody wasn't able

Brett Morrow

1 to post, there may have been rare occasions where we
2 would ask someone on Fraser Communications to post for
3 us, but I think rarely.

4 **Q. Has that been the case for the entire period**
5 **from 2019 to the present?**

6 A. No. At one time, Fraser Communications was not
7 a contracted agency prior to sometime in the spring of
8 2020, so it was just internal at that time.

9 MS. HAMILL: Okay.

10 I'm going to have marked as Exhibit 3 an e-mail
11 chain. This is labeled on the bottom right as 418
12 through 420 from the production from the County
13 Department of Public Health.

14 (Exhibit 3 marked for identification.)

15 **Q. (By Ms. Hamill) And I'll give you a couple of**
16 **minutes to review this document.**

17 MR. RAYGOR: Julie, when you're done with this
18 line of questioning, can we take a break?

19 MS. HAMILL: Sure.

20 **Q. (By Ms. Hamill) Have you seen this document**
21 **before?**

22 A. I have, yes.

23 **Q. And do you recognize this document as an e-mail**
24 **chain between you, Mr. Morrow, and the team at Fraser**
25 **Communications?**

Brett Morrow

1 A. I do, yes.

2 Q. So let's start with the very first e-mail in
3 this document at the top of what is marked on the bottom
4 as 418, and this is from you to Monique Cisneros, Erica
5 Lespron, and Bushra Aljaber. Am I pronouncing that --

6 A. I'm not sure.

7 Q. Okay.

8 MR. RAYGOR: So, Julie, sorry, for
9 clarification -- when you say first, you mean first in
10 placement or first in time?

11 MS. HAMILL: First in placement.

12 Q. (By Ms. Hamill) So the very top of the page on
13 Exhibit 3, and this e-mail from you says, "Let's do it
14 for all posts. I'm over people rn. LOL."

15 What does "rn" mean.

16 A. "Right now."

17 Q. And "LOL"?

18 A. "Laugh out loud."

19 Q. What did you mean when you said you are over
20 people right now?

21 A. I think I was generally frustrated about the
22 vitriol, the anger, and just the misinformation that was
23 permeating our posts.

24 Q. Are there specific examples that you can recall
25 of vitriol, anger, or misinformation?

Brett Morrow

1 A. Not specifically, no.

2 Q. But you're generally referring to comments on
3 social media?

4 A. Yes.

5 Q. From the public?

6 A. Yeah.

7 Q. Did you run this particular e-mail by anyone
8 else before you sent it?

9 A. No.

10 Q. And I notice it was sent at 12:09 a.m.; is that
11 when you sent the e-mail?

12 A. It appears so, yes.

13 Q. Do you normally work that late at night?

14 A. At times I have, yes.

15 Q. And why did you say "LOL" in this e-mail?

16 A. I can't remember.

17 Q. And when you said "Let's do it for all posts,"
18 what did you mean?

19 A. I think there was a question about -- I was
20 responding to a question about turning off comments for
21 all social posts moving forward.

22 Q. So in this e-mail, you are telling Fraser
23 Communications to turn off public commenting for all
24 posts on your social media.

25 A. Correct, yes.

Brett Morrow

1 Q. Okay.

2 Now, I'm going to go down to the next e-mail in
3 placement, which is just below the e-mail we were just
4 discussing, and this was sent Friday, July 29th, at
5 5:01 p.m. from Monique Cisneros, and the last line of
6 her e-mail says: "Also, scheduling in advance doesn't
7 allow us to turn off commenting, so it's easier if it's
8 all or nothing."

9 So does this mean that all of the County's
10 social media posts were scheduled in advance?

11 A. I'm not sure how they or if they scheduled
12 posts in advance, so --

13 Q. So at this time, July of 2022, was Fraser
14 Communications running the social media accounts for the
15 County?

16 A. I wouldn't say they were running it. They may
17 have been posting for us content that we had approved on
18 an as-needed basis.

19 Q. But they had access to the account; correct?

20 A. Correct, yes.

21 Q. And any time they would make any changes to the
22 account, would they have to run that by you first?

23 A. If that ever occurred, yes, but I don't believe
24 they ever made any changes to the account.

25 Q. Would they ever post any content to the account

Brett Morrow

1 without getting your approval first?

2 A. No.

3 Q. Okay.

4 And going down to the next e-mail in placement
5 on this page, this was sent Friday, July 29th at
6 3:08 p.m. from you, and it says: "Let's hold so we
7 don't flood them."

8 Can you explain to me what that meant.

9 A. You don't want to do too many posts in quick
10 succession, so you can break up the reception of it or
11 how people view it, so the audience isn't cannibalized
12 by many posts in quick succession, so you want to
13 stagger them with a few hours to refresh people's feeds.

14 Q. And who is "them"?

15 A. I'm assuming the general public.

16 Q. The general public.

17 A. I'm sorry. Our followers.

18 Q. And skipping over to what's marked at the
19 bottom as 420, this is the last page of Exhibit 3. I'll
20 give you a minute to review the content on this page.

21 A. Um-hum.

22 Q. So toward the bottom, it says "RT." I assume
23 that means retweet?

24 A. Yes.

25 Q. "Retweet suggestions John Ericson (monkeypox

Brett Morrow

1 influencer)."

2 What is a monkeypox influencer?

3 A. He was a -- may still be -- a local elected --
4 I think he's on the City Council for West Hollywood, and
5 he was doing a lot of work on what is now called Mpox
6 and was instrumental in sharing different messages about
7 Mpox. I believe at the time we were setting up a
8 vaccine site there, so we wanted to help promote it.

9 **Q. And did the Department of Public Health pay**
10 **Mr. Ericson to be an influencer?**

11 A. No.

12 **Q. Did Fraser pay Mr. Ericson to be an influencer?**

13 A. Not that I'm aware of.

14 **Q. So in order to be an influencer, one doesn't**
15 **need to be paid, in your opinion?**

16 A. Not necessarily. Some do require payments,
17 some don't.

18 **Q. Did the County of Los Angeles ever pay anyone**
19 **to be an influencer in the context of COVID?**

20 A. The County never did, no. There may have been
21 instances where one of our agencies contracted out with
22 content creators.

23 **Q. Are you aware of any specific examples?**

24 A. I don't remember. We weren't very successful
25 at it. I also don't know who a lot of the influencers

Brett Morrow

1 are these days.

2 Q. And so looking to the content above the "RT"
3 suggestion, this looks like copy for an ad; is that
4 correct?

5 A. I wouldn't say it's an ad; it looks like a
6 social media post.

7 Q. Okay.

8 So this is copy for social media posts.

9 A. Correct, yes.

10 Q. And who came up with the copy?

11 A. Typically, someone from the team will write the
12 copy, and then I review it.

13 Q. So "the team" meaning the employees of the
14 County Department of Public Health.

15 A. Or Fraser Communications. Now that I'm looking
16 at this, this may have been copy specifically from a
17 previous -- I'm sorry, another agency named Team Friday.

18 Q. Team Friday?

19 A. Correct, yes.

20 Q. And what was Team Friday's role in the
21 Department of Public Health?

22 A. Developing media campaigns around COVID
23 vaccinations and other COVID work.

24 Q. Did Dr. Ferrer or any other medical doctors,
25 review this copy before it went out?

Brett Morrow

1 MR. RAYGOR: Calls for speculation.

2 THE WITNESS: I don't recall.

3 Q. (By Ms. Hamill) Was it your practice to
4 provide a copy of content for social media posts to
5 Dr. Ferrer before posting?

6 A. Depends on the content. If it's something
7 that's complex or something that is new, typically we
8 would run it by her, or the idea by her, and she would
9 give us direction and then we would execute.

10 MS. HAMILL: Okay.

11 Do you want to take a break now?

12 MR. RAYGOR: Sure, if it's okay with you.

13 MS. HAMILL: Sure.

14 THE VIDEOGRAPHER: We're off the record. The
15 time is 11:10 a.m. Pacific Time.

16 (Recess taken from 11:10 a.m. to 11:25 a.m.)

17 THE VIDEOGRAPHER: We are back on the record.
18 The time is 11:25 a.m. Pacific Time.

19 Q. (By Ms. Hamill) Thank you.

20 So looking back at Exhibit 3, and this is the
21 second page of the exhibit. The bottom right is marked
22 as 419. And I'm looking for the second to last e-mail
23 on this page from Brett Morrow on July 29th at 1:05 p.m.
24 And it says: "Yep. Let's close comments on all of
25 those, too, from here forward. Let me text John about

1 RT'ing him to get the okay." Okay.

2 So are you referring to closing comments on the
3 post described in Monique's e-mail below that we were
4 just reviewing before we went on break?

5 A. I believe so, yes.

6 Q. Is this the first time that you had ever asked
7 Fraser Communications to close comments on social media
8 posts?

9 A. I don't recall.

10 Q. Is there anything that would refresh your
11 memory?

12 A. Probably looking at our timeline.

13 Q. At your timeline?

14 A. Yeah, for our social media posts, but I don't
15 believe so.

16 Q. So you don't believe that you had ever asked
17 Fraser to close public comments on social media posts
18 prior to July 29th.

19 A. Correct.

20 Q. And why did you want to close comments on this
21 particular post?

22 A. I think I had decided to, from --

23 (Stenographer clarification.)

24 THE WITNESS: -- then forward, to close public
25 commenting.

Brett Morrow

1 Q. (By Ms. Hamill) And why?

2 A. I was generally concerned about a lot of
3 misinformation and about how our channels were being
4 used.

5 Q. When you say "how our channels were being
6 used," what do you mean specifically?

7 A. Rather -- it could be people spreading
8 falsehoods, people bullying each other, harassing one
9 another, cursing at one another.

10 Q. Had you ever used Twitter's report function to
11 report any posts like that?

12 A. I believe so, yes.

13 Q. And to your recollection, did any of the posts
14 that you reported get removed?

15 A. I don't remember.

16 Q. Do you recall specifically any falsehood with
17 particularity that you could tell me about that you had
18 concerns about?

19 A. I think one, that we were lying about our case
20 numbers.

21 Q. Do you remember any more details about it?

22 A. That they were fake. That we were
23 over-inflating them.

24 Q. Were there any other falsehoods that you can
25 remember?

Brett Morrow

1 A. About our deaths and hospitalizations, similar.

2 Q. Deaths and hospitalizations?

3 A. Correct.

4 Q. That they were over-inflated?

5 A. Correct.

6 Q. Was there anything else that you can recall?

7 A. Not that I can recall.

8 Q. And what kind of bullying and harassment do you
9 recall?

10 A. People arguing with anger, making personal
11 attacks to other people, cursing at one another, just
12 general bullying and harassment behavior.

13 Q. Were there any threats of violence?

14 A. I believe so, yes.

15 Q. Did you ever report those threats of violence
16 to law enforcement?

17 A. I don't recall.

18 Q. Have you ever contacted law enforcement in your
19 capacity as a communications director for L.A. County
20 Department of Public Health?

21 A. I have not.

22 Q. You have not?

23 A. I have not.

24 Q. Do you know what the monetary amount is on the
25 County's contract with Fraser?

Brett Morrow

1 A. I don't recall, no.

2 Q. So who, within the Department of Public Health,
3 made the decision to disable public comments on social
4 media posts?

5 A. I would say I had the idea, and then I
6 discussed with counsel and then Dr. Ferrer.

7 Q. Did you discuss it with anyone else?

8 A. Not that I can recall.

9 Q. Did you discuss it with anyone outside of the
10 County Department of Public Health?

11 A. Not that I can recall.

12 Q. Did anyone give you the idea?

13 A. No.

14 Q. And so to be clear, the decision to disable
15 public comments was made by you in conjunction with
16 County Counsel and Dr. Ferrer?

17 A. Correct.

18 Q. Were any of the supervisors involved in the
19 decision?

20 A. No.

21 Q. Have you heard from any of them or anyone in
22 their offices since that decision was made?

23 A. I have heard from them, yes.

24 Q. About this decision?

25 A. No.

Brett Morrow

1 Q. Did you talk to anyone in Congressman Schiff's
2 office about closing public comments?

3 A. No.

4 Q. Was the closure of public comments ever
5 discussed in a public meeting at the County?

6 A. Not that I'm aware of. There are public
7 meetings that I'm not aware of or I don't attend, but
8 not that I'm aware of.

9 Q. Thank you.

10 And just to be very clear, when I ask you
11 questions, I don't want you to speculate about anything
12 that you don't have personal knowledge of. So don't
13 feel like you have to reach or stretch if you don't have
14 personal knowledge of something.

15 A. Okay.

16 Q. Did you talk to Dr. Ferrer about the comments
17 on social media prior to them being disabled?

18 A. Not that I remember.

19 Q. But you did talk to her about closing public
20 comments before that decision was made?

21 A. Correct.

22 Q. And what did she say to you about it?

23 A. I'm sorry. Can you repeat the question.

24 Q. What did Dr. Ferrer say to you about the idea
25 to close public comments?

Brett Morrow

1 A. I believe she just had some follow-up questions
2 about either how it's done or what actually that means.

3 **Q. Anything else?**

4 A. Not that I can recall.

5 **Q. Were any alternatives considered to closing off
6 all public comment?**

7 MR. RAYGOR: Objection. Lacks foundation that
8 all public comments were closed off.

9 THE WITNESS: Not that I can recall.

10 **Q. (By Ms. Hamill) Have you ever attended a Board
11 of Supervisors meeting in person?**

12 A. Yes.

13 **Q. When was the last Board of Supervisors meeting
14 that you attended in person?**

15 A. It may have been within the last year or so.

16 (Stenographer clarification.)

17 THE WITNESS: Yes. I attended with Dr. Ferrer
18 and Dr. Rita Singhal. They were presenting about Mpox.

19 **Q. (By Ms. Hamill) Do you recall the time period
20 that the Board of Supervisors meetings were remote only?**

21 A. Yes.

22 **Q. What was that time period?**

23 A. I would say sometime from 2020 for maybe a few
24 years.

25 **Q. At the time that the public comments were**

Brett Morrow

1 disabled on Department of Public Health's social media,
2 were the Board of Supervisors meetings remote?

3 A. I don't remember.

4 Q. Is there anything that would refresh your
5 memory?

6 A. Not that I know of.

7 MS. HAMILL: Going to have marked as Exhibit 4
8 the press release from the County of Los Angeles dated
9 September 9th, 2022.

10 (Exhibit 4 marked for identification.)

11 Q. (By Ms. Hamill) Have you seen this document
12 before?

13 A. I don't believe so.

14 Q. Does this document refresh your recollection
15 that the Board of Supervisors meetings reopened to the
16 public on September 27th of 2022?

17 A. It does, yes.

18 Q. And the decision to disable public comments was
19 made in July of 2022; correct?

20 A. Yes.

21 Q. And so at the time that decision was made to
22 close public comments, the public could not attend Board
23 of Supervisors meetings in public; correct?

24 A. Correct, yes.

25 Q. So prior to September of 2022, how could the

Brett Morrow

1 public get in touch with the Department of Public
2 Health?

3 A. They could call us, they could e-mail us, and
4 they could send us messages on our social media account.

5 Q. Direct messages?

6 A. Correct, yes.

7 Q. And who handles the phone calls within the
8 Department of Public Health?

9 A. I don't -- I don't know specifically. There's
10 a call center staff that handles them.

11 Q. So that's not your team?

12 A. No.

13 Q. And who responds to Department of Public Health
14 e-mails?

15 A. Another department as well. I'm not certain
16 the name of that department.

17 Q. Is it like an e-mail version of a call center?

18 A. I don't know.

19 Q. Okay.

20 So those people are not on your team.

21 A. Correct.

22 Q. Who responds to the direct messages?

23 A. The communications team.

24 Q. Communications team.

25 MR. RAYGOR: Asked and answered.

Brett Morrow

1 Q. (By Ms. Hamill) Is there one designated person
2 who responds, or is the responsibility shared between
3 multiple people?

4 A. Primarily, there's one person.

5 Q. I'm sorry. Can you repeat.

6 A. Primarily, there is one person.

7 Q. Who is the one person?

8 A. Erica Lespron.

9 Q. And is Erica an employee of the County, or is
10 she an employee of Fraser?

11 A. The County.

12 Q. Did you ever hear from people who had
13 difficulty getting through to speak when Board of
14 Supervisors meetings were remote?

15 A. Not that I ever remember.

16 Q. Did you ever experience technical difficulties
17 when participating in a Board of Supervisors meeting
18 remotely?

19 MR. RAYGOR: Objection. Lacks foundation that
20 he --

21 (Stenographer clarification.)

22 MR. RAYGOR: -- ever did that.

23 THE WITNESS: I never participated in Board of
24 Supervisors meetings.

25 Q. (By Ms. Hamill) Did you ever assist Dr. Ferrer

1 in her participation in remote Board of Supervisors
2 meetings?

3 A. I did not, no.

4 Q. Did she have her own technical team to do that?

5 A. Yes.

6 Q. And what was the process your office used to
7 respond to direct messages on social media after
8 disabling public comments?

9 A. Typically, depending on the question, we would
10 just answer the question or point people to the right
11 information on our website that they needed. If it was
12 more complex, oftentimes, we would have to refer to
13 other teams to get the information for them.

14 Q. And was it your policy to respond to every
15 direct message?

16 A. I wouldn't say it's our policy, but we tried
17 our best.

18 Q. Were there direct messages that went
19 unresponded to?

20 A. I'm sure, yes.

21 Q. Do you have an idea of how many?

22 A. I don't, no.

23 Q. Do you have any idea how many direct messages
24 your office has received since July of 2022?

25 A. I don't know.

Brett Morrow

1 Q. Can you estimate -- estimate the number? Is it
2 more than 100 or less than 100?

3 A. I would say more than 100.

4 Q. More than 100.

5 A. Yes.

6 MR. RAYGOR: Asked and answered.

7 Q. (By Ms. Hamill) More than 1,000 or less than
8 1,000?

9 A. Less than 1,000.

10 Q. So somewhere between 100 and 1,000.

11 A. Yes.

12 Q. And not all of those received responses.

13 MR. RAYGOR: Asked and answered.

14 THE WITNESS: I think --

15 (Stenographer clarification.)

16 THE WITNESS: -- very -- sorry. Very few
17 didn't receive responses.

18 MS. HAMILL: I'm going to have marked as
19 Exhibit 5 printouts from the County's Twitter archive
20 that was produced in discovery showing direct messages
21 marked for identification.

22 (Exhibit 5 marked for identification.)

23 Q. (By Ms. Hamill) I'll give you a minute to look
24 through these. And just for the record, Exhibit 5, the
25 pages are labeled 136 through 142 at the bottom right.

Brett Morrow

1 So let's start at the last page of this exhibit
2 which is marked on the bottom right as 142.

3 A. Um-hum.

4 Q. And this is a direct message to the Department
5 of Public Health. Says, "Hello. I'm concerned that
6 Ms. Ferrer says she's unable to get boosted. Could you
7 please tell us why." And this message did not receive a
8 response.

9 Do you recall seeing this particular message in
10 the direct messages?

11 MR. RAYGOR: Objection. Lacks foundation it
12 did not receive a response.

13 THE WITNESS: I don't recall seeing this
14 message.

15 Q. (By Ms. Hamill) Did you personally ever review
16 the direct messages or respond to direct messages
17 yourself?

18 A. At times, yes.

19 Q. At times. I'll turn your attention to Page 141
20 of this exhibit, and this is another direct message that
21 asks, "Also, what is the official response to this?" and
22 it shares an article about titanium dioxide particles in
23 face masks.

24 Do you recall ever seeing this direct message?

25 MR. RAYGOR: Objection. Lacks foundation that

Brett Morrow

1 that's what that link discusses or addresses.

2 THE WITNESS: I don't recall seeing this
3 message.

4 Q. (By Ms. Hamill) And -- okay.

5 And turning to what is marked as Page 138, it's
6 another direct message that says: "Could you please let
7 businesses and schools know that plastic barriers are
8 outdated and unhelpful to stopping the spread of COVID?
9 Thanks."

10 Do you recall ever seeing this direct message?

11 A. I don't recall.

12 Q. And if you had been responding to direct
13 messages when this was received, would you have
14 responded to it?

15 MR. RAYGOR: Objection. Improper hypothetical.
16 Lacks foundation. Insufficient factual foundation in
17 order to allow a proper response.

18 THE WITNESS: I'm not quite sure how to answer
19 that, yeah.

20 Q. (By Ms. Hamill) It was quite a long objection.
21 If you were checking the direct messages --

22 A. Um-hum.

23 Q. -- at the time this one was received, would you
24 have ignored it, or would you have responded?

25 MR. RAYGOR: Improper and incomplete

1 hypothetical. Calls for speculation.

2 THE WITNESS: I don't know.

3 Q. (By Ms. Hamill) Is there anything particular
4 about the wording in this direct message that would lead
5 you to think it was okay to ignore it?

6 A. I don't know. I don't think so.

7 Q. Was it your practice to ignore any sort of
8 direct message?

9 A. We didn't -- never purposely ignored messages.
10 We tried to do what we can --

11 (Stenographer clarification.)

12 THE WITNESS: -- with our limited resources.

13 Q. (By Ms. Hamill) Was there ever a situation
14 where you reviewed a direct message, and it was
15 inflammatory, and you felt it didn't warrant a response?

16 A. I believe so, yes.

17 Q. Going back to the first page of this Exhibit
18 No. 5, it's marked as 136 on the bottom right. Would
19 you like me to read this out loud for you, or would you
20 like to read it to yourself?

21 A. No, you don't --

22 Q. I can ask you about it.

23 Do you recall seeing --

24 MR. RAYGOR: Can we just -- sorry. Can we just
25 finish reading.

Brett Morrow

1 MS. HAMILL: Sure.

2 MR. RAYGOR: Sorry. Go ahead.

3 Q. (By Ms. Hamill) Do you recall seeing this
4 direct message?

5 A. I don't recall.

6 Q. Is it you who responded: "Is this for a media
7 outlet?"

8 A. I don't remember.

9 Q. Okay.

10 And turning to the next page, this is a
11 continuation of the same message. L.A. Public Health
12 asks: "Is this for a media outlet?"

13 The messenger responds: "He is a freelance
14 writer for a blog site."

15 The Public Health account responds --

16 (Stenographer clarification.)

17 Q. (By Ms. Hamill) -- "Okay. Yes. Best thing
18 for him to do is to e-mail the media inbox. They are a
19 separate team and can help him. Let me grab the e-mail
20 address for you."

21 A member of the public responds, "Thanks so
22 much."

23 The County responds, "Media@ph.lacounty.gov."

24 Does this refresh your memory as to this direct
25 message?

Brett Morrow

1 A. In what way?

2 **Q. Do you recall this respondent within the County**
3 **being you?**

4 A. Oh, I don't remember if this was me or not.

5 **Q. And what is the media@ph.lacounty.gov address?**

6 A. That's --

7 (Stenographer clarification.)

8 THE WITNESS: -- our media -- our e-mail intake
9 for requests from media outlets.

10 **Q. (By Ms. Hamill) And does this go to your team?**

11 A. It does, yes.

12 MS. HAMILL: And I'm going to mark as
13 Exhibit 6 -- sorry. One of those is for Mr. Raygor.

14 Exhibit 6 is an e-mail dated August 22nd, 2022,
15 from bobhoge@gmail.com to media@ph.lacounty.gov, and if
16 you compare the content of this e-mail with the direct
17 message on the first page of Exhibit No. 5, they look to
18 be identical.

19 (Exhibit 6 marked for identification.)

20 MR. RAYGOR: Mischaracterizes the content of
21 Exhibits 5, first page, and Exhibit 6. Some parts
22 appear identical; others do not.

23 **Q. (By Ms. Hamill) Did you receive this e-mail**
24 **that's dated August 22nd?**

25 A. It wasn't sent to me.

1 Q. Who answers the media@ph.lacounty.gov address?

2 MR. RAYGOR: Asked and answered.

3 THE WITNESS: We have different team members at
4 different times who --

5 (Stenographer clarification.)

6 MR. RAYGOR: Keep your voice up.

7 THE WITNESS: I apologize.

8 -- who man the media inbox.

9 Q. (By Ms. Hamill) And those people are under
10 your supervision.

11 A. Correct.

12 Q. Do you recall ever seeing this e-mail?

13 A. I don't recall.

14 Q. Do you recall ever responding to this e-mail?

15 A. I don't recall.

16 Q. Do you recall instructing your team not to
17 respond to this e-mail?

18 A. I don't recall.

19 Q. Is there any reason that you can think of as to
20 why that e-mail wouldn't get a response?

21 MR. RAYGOR: Objection. Lacks foundation that
22 it didn't.

23 THE WITNESS: I don't know.

24 MS. HAMILL: I'm going to mark as Exhibit 7 a
25 direct message dated March 6th.

Brett Morrow

1 (Exhibit 7 marked for identification.)

2 Q. (By Ms. Hamill) Have you seen this before?

3 A. I have not, no.

4 Q. Do you recognize this as a direct message to
5 the L.A. County Department of Public Health?

6 A. I do, yes.

7 Q. From a Dr. Amir Guerami. And do you see any
8 response to this direct message?

9 A. I do not.

10 MS. HAMILL: Mark as Exhibit 8 a direct message
11 dated February 22nd.

12 (Exhibit 8 marked for identification.)

13 Q. (By Ms. Hamill) Do you recognize this document
14 as a direct message from a member of the public to the
15 Department of Public Health at L.A. County?

16 A. I do, yes.

17 Q. And do you see a response to this direct
18 message?

19 A. I do not, no.

20 Q. Did you personally review this direct message?

21 A. No.

22 MS. HAMILL: I'm going to have marked as
23 Exhibit 9 a direct message dated February 16th.

24 (Exhibit 9 marked for identification.)

25 MR. RAYGOR: And just for the record, Exhibits

Brett Morrow

1 7, 8, and 9 are from the year 2023.

2 Q. (By Ms. Hamill) Do you recognize this document
3 as a direct message from a member of the public to the
4 L.A. County Department of Public Health?

5 A. I do, yes.

6 Q. And does this message have a response?

7 A. It does not.

8 MS. HAMILL: I'm going to have marked as
9 Exhibit No. 10 a direct message dated December 16th,
10 2022.

11 (Exhibit 10 marked for identification.)

12 Q. (By Ms. Hamill) Do you recognize this document
13 as direct messages from a member of the public to the
14 L.A. County Department of Public Health?

15 A. I do, yes.

16 Q. And do you see any responses to this direct
17 message?

18 A. I do not.

19 MS. HAMILL: I'm going to have marked as
20 Exhibit 11 a direct message dated September 23, 2022.

21 (Exhibit 11 marked for identification.)

22 Q. (By Ms. Hamill) Do you recognize this document
23 as a direct message from a member of the public to the
24 L.A. County Department of Public Health?

25 A. I do, yes.

Brett Morrow

1 Q. And do you see a response here to this direct
2 message?

3 A. I do not.

4 MS. HAMILL: I'm going to mark as Exhibit
5 No. 12 a direct message dated August 22nd, 2022.

6 (Exhibit 12 marked for identification.)

7 Q. (By Ms. Hamill) Do you recognize this document
8 as a direct message from a member of the public to the
9 L.A. County Department of Public Health?

10 A. I do, yes.

11 Q. And do you see any response to this direct
12 message?

13 A. I do not, no.

14 Q. And you didn't personally review this direct
15 message when it came through, did you?

16 A. No.

17 Q. Are members of the public invited to L.A.
18 County Department of Public Health press briefings?

19 A. They're invited to view them online. We live
20 stream them, but typically the in-person are reserved
21 for media.

22 Q. Does it require a press credential?

23 A. Not formally a press credential; we don't check
24 press credentials. We typically know the reporters who
25 show up or speak with them to learn about their media

Brett Morrow

1 outlet.

2 Q. But they are not open to the general public.

3 A. No.

4 Q. Are members of the press invited to the County
5 Department of Public Health K through 12 briefings?

6 A. I don't know. I don't --

7 (Stenographer clarification.)

8 THE WITNESS: -- believe tele-briefings are
9 open to media outlets.

10 Q. (By Ms. Hamill) Is that a policy that you came
11 up with?

12 A. No.

13 Q. So would you ever tag or advise someone on your
14 team to tag someone who disagrees with Dr. Ferrer's
15 policies in the County's social media posts?

16 MR. RAYGOR: Objection. Compound.

17 THE WITNESS: I'm sorry. Can you break that
18 up, yeah, if you could.

19 Q. (By Ms. Hamill) So do you understand what I
20 mean when I say tagging someone in a social media post?

21 A. Yes.

22 Q. And it's true that currently, whoever the
23 County tags in a social media post can respond.

24 A. I don't know if that's true for all platforms,
25 but I believe for some, yes.

Brett Morrow

1 Q. For Twitter; correct?

2 A. For Twitter, yes, I believe so.

3 Q. Okay.

4 And so would you or anyone else on your team
5 tag someone in a Twitter post that disagrees with
6 Dr. Ferrer on COVID policy, for example?

7 MR. RAYGOR: Objection. Improper, incomplete
8 hypothetical. Calls for speculation.

9 THE WITNESS: I don't -- we don't really tag
10 people.

11 Q. (By Ms. Hamill) You don't tag people?

12 A. We don't necessarily, yeah. Rarely, if at all.

13 Q. Do you recall a specific instance when you did
14 tag someone in a Twitter post?

15 A. I don't recall.

16 Q. What about a Facebook post?

17 A. I don't recall.

18 Q. Instagram?

19 A. I don't recall.

20 Q. Would it be unusual for the County to tag the
21 L.A. County USC Hospital in a post?

22 A. I'm not sure what you mean by "unusual."

23 Q. Would you advise that your team not tag the
24 L.A. County USC Hospital in a social media post?

25 A. No.

1 MR. RAYGOR: Improper -- go ahead.

2 Q. (By Ms. Hamill) Would you ever invite a
3 speaker who disagrees with Dr. Ferrer to speak at a
4 press briefing on COVID?

5 MR. RAYGOR: Objection. Improper and
6 incomplete hypothetical. Calls for speculation.

7 THE WITNESS: I don't -- I don't know how to
8 answer that. I don't think so.

9 Q. (By Ms. Hamill) You don't think so.

10 MR. RAYGOR: Asked and answered.

11 THE WITNESS: I don't know how to answer that.

12 Q. (By Ms. Hamill) I'll ask it again, and then
13 see how you answer it.

14 Would you ever invite a speaker who disagrees
15 with Dr. Ferrer to speak at a press briefing on COVID?

16 MR. RAYGOR: Incomplete and improper
17 hypothetical. Calls for speculation.

18 THE WITNESS: I don't think there's a way for
19 me to know every opinion that every speaker at a press
20 briefing has, so I don't think I can answer that --

21 Q. (By Ms. Hamill) Are you --

22 A. -- truthfully.

23 Q. Are you responsible for inviting speakers to
24 participate in press briefings?

25 A. Not completely. At times, yes, I have invited

Brett Morrow

1 speakers.

2 Q. Who have you invited?

3 A. Oh, I don't remember.

4 Q. At any point, has any member of the Board of
5 Supervisors expressed concern about lack of public
6 access to the Public Health office?

7 A. I'm not sure what you mean by the Public Health
8 office.

9 Q. Your department. The Department of Public
10 Health.

11 A. No, I've never heard anything about -- like
12 that from the Board of Supervisor office.

13 Q. And does your department have any policies or
14 processes that it uses to communicate with the public?

15 A. I don't know. Not that I'm aware of.

16 Q. Do you see it as part of your job to prevent
17 bullying and harassment?

18 MR. RAYGOR: Objection. Overbroad. In the
19 world at large?

20 THE WITNESS: I see it as our job to promote
21 health and safety for people; and at times, that may
22 include bullying as well. Or harassment.

23 Q. (By Ms. Hamill) So an avoidance of bullying
24 and harassment is part of your overall mission.

25 A. I wouldn't say it's necessarily a part of our

Brett Morrow

1 overall mission. Our mission is to improve the health
2 and well-being of residents.

3 **Q. And what do you consider to be bullying?**

4 A. Name-calling, harassment, speaking angrily,
5 trying to control someone with language, intimidation.

6 **Q. Trying to control someone with language. What
7 do you mean by that?**

8 A. Trying to get people to back down from
9 speaking.

10 **Q. Can you give me an example.**

11 A. If -- if somebody shouts at another person,
12 they're trying to get someone to not speak, to
13 intimidate them.

14 **Q. And do you see it as part of your role as the
15 Chief of Communications of the Department of Public
16 Health to prevent that from happening in the public?**

17 A. Again, I would say not specifically. Our role
18 is to increase and promote and improve the well-being of
19 the residents in L.A. County, health and well-being.

20 **Q. I'm going to hand you a copy of what was marked
21 previously in the deposition of Barbara Ferrer as
22 Exhibit 6. We don't need to remark it.**

23 **Have you seen this document before?**

24 A. I have, yes.

25 **Q. And do you recognize this as an e-mail thread**

Brett Morrow

1 between you -- Brett Morrow -- and Marla Tellez and
2 Elizabeth Ford at Fox?

3 A. I do.

4 Q. And so in the middle of this document, is an
5 e-mail from you dated August 4th at 5:48 p.m. And this
6 is a statement from Public Health. It says, "Public
7 Health has zero tolerance for threats, bullying, or
8 harassment on any of our platforms and made the decision
9 to disable social media comments after receiving
10 concerns from numerous residents who were being
11 targeted. Residents who wish to share their thoughts
12 with Public Health on social media can still do so by
13 sending direct messages to our accounts."

14 Do you recall sending that statement to
15 Elizabeth Ford and Marla Tellez.

16 A. I don't remember sending it, but I see that
17 it's been -- I sent the e-mail, but yes. Generally,
18 yes.

19 Q. And does that accurately summarize why you
20 decided to disable public comment?

21 MR. RAYGOR: Objection. Mischaracterizes the
22 statement. Lacks foundation.

23 THE WITNESS: I would say it's a part of.

24 Q. (By Ms. Hamill) It's a part of. And what's
25 missing?

Brett Morrow

1 A. Misinformation.

2 Q. Is there anything else that's missing?

3 A. Not that I can think of at the moment.

4 Q. And so you mentioned receiving concerns from
5 numerous residents. How were those concerns received?

6 A. There were people who sent us direct messages
7 and e-mails.

8 Q. And what did those messages and e-mails say?

9 A. I can't remember the specifics. Just saying
10 that they were concerned that the comments were just a
11 negative space.

12 Q. Did they feel threatened?

13 A. I don't remember people saying directly that
14 they've been threatened.

15 Q. Did you ever advise any of those concerned
16 residents to report the posts?

17 A. I don't recall.

18 Q. Did you discuss this statement in Exhibit 6
19 with Dr. Ferrer before sharing it with Fox?

20 A. I don't remember.

21 Q. Did you write this statement?

22 A. I don't remember, but I believe so.

23 Q. Is this something that you would consider
24 crisis management?

25 A. No.

Brett Morrow

1 **Q. Why not?**

2 A. It's a part of COVID, so maybe it's adjacent,
3 but it wasn't really an emergency. I think it was
4 timely, yeah.

5 **Q. So how would you define misinformation?**

6 A. Say it's the spread of false information that
7 can be factually incorrect either on purpose or
8 inadvertently.

9 **Q. And how would you determine what content was**
10 **misinformation?**

11 MR. RAYGOR: Objection. Lacks foundation that
12 he has personal knowledge or it's in his skill set.

13 THE WITNESS: I would refer to our experts.

14 **Q. (By Ms. Hamill) So when you've -- you**
15 **mentioned earlier that one of the reasons for shutting**
16 **down public comments was misinformation, and so if you**
17 **wanted to determine whether or not a certain comment by**
18 **a member of the public was misinformation, would you run**
19 **it by Dr. Ferrer or another doctor first?**

20 MR. RAYGOR: Objection. Incomplete
21 hypothetical. Improper hypothetical. Calls for
22 speculation.

23 THE WITNESS: At times, depending on the piece
24 of misinformation.

25 **Q. (By Ms. Hamill) Do you recall any specific**

Brett Morrow

1 incidents of seeing misinformation in the comments?

2 A. Yes.

3 Q. Can you tell me about one.

4 A. That our case numbers were inflated.

5 Q. And so did you go and discuss the case numbers
6 with Dr. Ferrer?

7 A. No, I don't discuss case numbers with
8 Dr. Ferrer in that manner.

9 Q. But you knew it was misinformation?

10 A. Correct.

11 Q. How?

12 A. Because I rely on our experts and our
13 leadership team made up of both epidemiologists, MDs,
14 public health experts.

15 Q. And so how did you get the case numbers from
16 those experts?

17 MR. RAYGOR: Objection. Lacks foundation.

18 THE WITNESS: They are sent to us.

19 Q. (By Ms. Hamill) They're sent to you?

20 A. Yes.

21 Q. By e-mail?

22 A. Correct.

23 Q. And so if your expert said that certain case
24 numbers were a reality, and someone else in the public
25 said, "No, these are the case numbers," you would defer

1 to your experts, and everything else would be
2 misinformation; is that correct?

3 MR. RAYGOR: Objection. Mischaracterizes his
4 testimony. Lacks foundation.

5 THE WITNESS: I -- I don't know. It would
6 depend specifically what the person was referring to. I
7 can't know in a hypothetical like that.

8 Q. (By Ms. Hamill) Okay.

9 Well, you told me you remember a specific
10 instance of someone inflating -- or saying that the case
11 numbers were inflated.

12 A. Um-hum.

13 Q. And so I'm just wondering how you made the
14 determination that that was misinformation.

15 MR. RAYGOR: Asked and answered.

16 THE WITNESS: We rely on our experts and -- our
17 public health experts and our leadership team.

18 Q. (By Ms. Hamill) I mean you specifically.

19 A. Me, specifically?

20 MR. RAYGOR: Asked and answered.

21 THE WITNESS: I rely on -- yeah, I rely on our
22 Public Health experts.

23 Q. (By Ms. Hamill) And so saying anything that
24 deviated from what was coming out of Ferrer's office
25 would be considered misinformation.

Brett Morrow

1 MR. RAYGOR: Objection. Improper, incomplete
2 hypothetical. Lacks foundation. Calls for speculation.

3 THE WITNESS: I wouldn't say it necessarily
4 that way.

5 Q. (By Ms. Hamill) How would you say it?

6 A. We determine what's credible and also what
7 makes sense most for the Los Angeles -- Los Angeles
8 County, and that's what we provide to people, what's
9 determined to be credible or accurate or making the most
10 sense for our county's residents.

11 Q. Did you personally receive any training on how
12 to detect misinformation?

13 A. No.

14 Q. Did you have any concerns about limiting speech
15 when you disabled the public comments?

16 MR. RAYGOR: I caution you to the extent that
17 you had communications with counsel on that subject or
18 any subject that could require the disclosure of
19 attorney-client privileged information, and I would
20 instruct you not to answer to the extent that is what
21 you're thinking of answering.

22 MS. HAMILL: I definitely don't want to hear
23 anything that your attorney told you.

24 MR. RAYGOR: Or that you told attorneys.

25 MS. HAMILL: If you have an independent thought

1 that you then told an attorney, that is not protected by
2 attorney-client privilege. If you had a discussion with
3 your lawyer, I don't want to know what your lawyer told
4 you.

5 THE WITNESS: I think I will listen to my
6 counsel.

7 **Q. (By Ms. Hamill) So what's your response?**

8 MR. RAYGOR: So just to be clear, if your
9 response would require the disclosure of communications
10 with counsel on the subject, then I would instruct you
11 not to answer. If you can answer the question without
12 disclosing such communications, then you may go ahead
13 and do so.

14 THE WITNESS: I don't recall --
15 (Stenographer clarification.)

16 THE WITNESS: -- so I won't answer the
17 question.

18 **Q. (By Ms. Hamill) Do you believe that the**
19 **Department of Public Health has an obligation to prevent**
20 **the spread of misinformation?**

21 A. I think "obligation" is the word I'm tussling
22 with, because, really, our -- it's our mission. That's
23 our obligation, and sometimes that may include dealing
24 with misinformation.

25 **Q. And how do you accomplish that?**

Brett Morrow

1 A. Dealing with misinformation?

2 Q. Yes.

3 A. It's very complicated. Sometimes that may
4 include putting out clarifying information, engaging
5 with community partners to provide clarifying
6 information.

7 Q. Anything else?

8 A. That's all I can think of right now.

9 Q. So can you think of an example of engaging with
10 a community partner to provide clarifying information?

11 A. I think there were concerns from a church group
12 specifically about the development of the vaccines, and
13 so we provided them some clarifying information about
14 the vaccines. I don't remember the specific details,
15 though.

16 Q. And then did that church group disseminate the
17 information to their members?

18 A. I don't know.

19 Q. But you consider the church a community
20 partner?

21 A. Yes, they're a faith-based community partner.

22 Q. Do you remember what their specific concerns
23 were?

24 A. I don't remember.

25 Q. Can you remember any other examples of where

1 you engaged a community partner to provide clarifying
2 information?

3 A. I don't remember.

4 Q. Have you considered reopening public comments
5 on social media?

6 A. No.

7 Q. And that's within your control; correct?

8 A. Technically, yes. My team is the one who
9 operates the social -- you mean the functionality of
10 actually turning it on? Yes.

11 Q. And why wouldn't you consider reopening public
12 comments?

13 A. Because I remain concerned about the spread of
14 misinformation and how our channels may potentially be
15 used in inappropriate ways.

16 MS. HAMILL: I am going to attempt to get
17 through these two sets of documents, and then we'll
18 break for lunch. Does that sound good?

19 MR. RAYGOR: That's fine.

20 THE WITNESS: Sure.

21 MS. HAMILL: Okay.

22 Q. (By Ms. Hamill) Are you familiar with the alt
23 account known as @alt_lacph?

24 A. I am.

25 Q. And were you concerned about that account?

Brett Morrow

1 A. I was, yes.

2 Q. Why?

3 A. I thought it may confuse people that it was a
4 Department of Public Health's official account.

5 Q. Any other concerns?

6 A. I believe it used our logo as well.

7 Q. And did you see the content of that account's
8 posts?

9 A. Yes.

10 Q. What were the -- what was the content?

11 A. If I remember correctly, it reshared our
12 content.

13 Q. It reshared your content?

14 A. Correct.

15 Q. Did it spread any misinformation?

16 MR. RAYGOR: Vague and ambiguous. The County's
17 content spread misinformation.

18 Q. (By Ms. Hamill) Do you understand my question?

19 A. I don't, no.

20 Q. Did the alt account spread misinformation?

21 A. I don't know.

22 Q. That wasn't your concern with respect to that
23 account?

24 A. One of my concerns. It could have spread
25 misinformation.

Brett Morrow

1 Q. Were you concerned that it was allowing a forum
2 for open discussion?

3 A. No.

4 Q. Did you do anything to try and limit that
5 account's visibility on Twitter?

6 A. I had contacted Twitter with my concerns.

7 Q. How did you contact them?

8 A. I believe via e-mail.

9 Q. Did you attempt to report the account using the
10 app's functions first?

11 A. I don't remember.

12 Q. Do you understand what I'm talking about when I
13 say --

14 A. There's an embedded function to how you could
15 report things. I don't remember.

16 Q. Did you ever use the report function for any
17 other circumstance in your capacity as the Chief
18 Communications Officer?

19 A. I don't remember. I don't think so.

20 Q. And so when you contacted Twitter via e-mail,
21 what did you want them to do?

22 A. Uh, whatever their process was to consider,
23 whether or not the accounts may have been violating the
24 terms and conditions.

25 Q. So you just wanted Twitter to consider whether

1 that account was violating their policies.

2 A. Correct.

3 MS. HAMILL: I'm going to have marked as
4 Exhibit 13 an e-mail chain between Brett Morrow and
5 Twitter that is marked on the bottom right as Document
6 Nos. 1 through 6 in the County's document production.

7 (Exhibit 13 marked for identification.)

8 Q. (By Ms. Hamill) And I'll give you a couple of
9 minutes to review this document before I start asking
10 you questions. Have you seen this document before?

11 A. I have, yes.

12 Q. Do you recognize this document as an e-mail
13 thread between yourself and Twitter?

14 A. It's the government relations department at
15 Twitter, yes.

16 Q. Okay.

17 So let's go to what's marked on the bottom
18 right as Page 5, the very bottom. I believe this is the
19 first e-mail in the thread. This is from Brett Morrow
20 dated July 20th, 2022, at 1:50 p.m., and it's sent to
21 lculbertson@twitter.com with a CC to
22 boland@mail.house.gov. The subject is referral from
23 Patrick Boland, L.A. County Department of Public
24 Health/staff harassment on Twitter.

25 Who was L. Culbertson?

Brett Morrow

1 A. My understanding is she worked at Twitter in
2 the government relations department. I didn't know her.

3 **Q. In the government relations department?**

4 A. I believe so, yes.

5 **Q. And who is boland@mail.house.gov?**

6 A. That is Patrick Boland.

7 **Q. How do you know him?**

8 A. He is a friend of mine, and we worked together.

9 **Q. When did you work together?**

10 A. In 2012.

11 **Q. Did you work together in Congressman Schiff's**
12 **office?**

13 A. Briefly, yes.

14 **Q. Did you work together in any other capacity?**

15 A. No.

16 **Q. Did you meet Mr. Boland while you were working**
17 **for Mr. Schiff?**

18 A. I met him before. I was -- I'm sorry. I had
19 met Patrick in between the campaign and when I was
20 working for Adam. At the time I met Patrick, I was not
21 presently working for Congressman Schiff. I apologize.

22 **Q. So you met Mr. Boland through working with**
23 **Congressman Schiff?**

24 A. Yes.

25 **Q. Okay.**

1 And is it your understanding that
2 **Ms. Culbertson was the head of U.S. public policy for**
3 **Twitter?**

4 A. Yes, but I don't specifically remember. I
5 didn't know her.

6 **Q. How did you get her contact information?**

7 A. Patrick provided it to me.

8 MR. RAYGOR: Just a second. Is this going to
9 interfere if I put it here?

10 THE VIDEOGRAPHER: It's not even working.

11 MR. RAYGOR: Okay.

12 **Q. (By Ms. Hamill) And what did Patrick tell you**
13 **about Lauren Culbertson?**

14 A. He didn't tell me anything; he just gave me her
15 contact information and maybe told me her role.

16 **Q. And what was the context? Did you reach out to**
17 **Patrick for help?**

18 A. I believe so, yes.

19 **Q. And what did you say to Patrick when you**
20 **reached out to him?**

21 A. I don't remember. I think it was something
22 along the lines that we were concerned about certain
23 things happening on Twitter.

24 **Q. Why would you contact Mr. Boland?**

25 A. Patrick knows a lot of people.

Brett Morrow

1 Q. What kind of people does Patrick know?

2 A. He's been working in politics a lot longer than
3 I did, and government.

4 Q. And is he -- he's chief of staff for
5 Congressman Schiff; is that correct?

6 MR. RAYGOR: Objection. Vague as to time.

7 THE WITNESS: Now he is. I don't -- I can't
8 remember if he was at the time.

9 Q. (By Ms. Hamill) Do you recall what his role
10 was in July of 2022?

11 MR. RAYGOR: Asked and answered.

12 THE WITNESS: I don't.

13 Q. (By Ms. Hamill) What was his role when you
14 first met him?

15 A. He was the communications director.

16 Q. For Schiff?

17 A. Yes.

18 Q. To your knowledge, did he have any other
19 positions in Congressman Schiff's office?

20 MR. RAYGOR: At that time? Vague as to time.

21 THE WITNESS: I think at one point he had the
22 title of senior advisor, but I'm not certain.

23 Q. (By Ms. Hamill) So you have no idea how long
24 he's been chief of staff to Mr. Schiff?

25 A. I don't remember, no.

Brett Morrow

1 Q. Okay.

2 So you reached out to Mr. Boland because you
3 needed some help with Twitter, and you knew that he was
4 well connected. And Mr. Boland said, "Here, contact
5 Lauren Culbertson."

6 A. Yes.

7 Q. And did he tell you to CC him on the
8 communications?

9 A. I believe I asked him if I could.

10 Q. And I assume he approved.

11 A. Yes.

12 Q. And was it his idea, or was it your idea to
13 have the subject line in all caps: REFERRAL FROM
14 PATRICK BOLAND?

15 A. I'm sure it was my idea, since I wrote the
16 e-mail.

17 Q. And why did you feel the need to include that
18 this was a referral from Patrick Boland?

19 MR. RAYGOR: Objection. Lacks foundation that
20 he felt the need.

21 THE WITNESS: I don't know. I imagine because
22 people in their position get a lot of e-mails.

23 Q. (By Ms. Hamill) And did Patrick have a
24 personal relationship with Lauren?

25 A. I have no idea.

Brett Morrow

1 Q. But you figured if you had mentioned in all
2 caps in the subject line "REFERRAL FROM PATRICK BOLAND,"
3 your e-mail would probably get attention?

4 A. I assume so, yes.

5 Q. And going down to the body of the e-mail, on
6 this Page 5, it says: "I was referred to you by my
7 friend Patrick Boland who I used to work with in
8 Congressman Schiff's office."

9 Why did you feel the need to reference the fact
10 that you worked in Congressman Schiff's office?

11 A. I don't remember.

12 Q. Is there anything that would refresh your
13 memory?

14 A. I don't know.

15 Q. Did you have communications with Mr. Boland via
16 text or e-mail about this issue?

17 A. I don't remember.

18 Q. At the time, do you recall what Congressman
19 Schiff's role was in the committee on national security
20 in the United States House of Representatives?

21 A. I don't remember, no.

22 Q. Do you recall any of Mr. Schiff's work with
23 Section 230 reform?

24 A. I don't, no. I don't know what that is.

25 Q. I'm sorry. I misspoke. He was chairman of the

Brett Morrow

1 Permanent Select Committee on Intelligence.

2 A. I knew his committee title, yes. I don't know
3 anything about the work that he was doing.

4 Q. So you knew that he was chair of that
5 committee.

6 A. Yes. Yes.

7 Q. Okay.

8 And that makes him sound somewhat important;
9 correct?

10 MR. RAYGOR: Objection. Calls for speculation.

11 THE WITNESS: Somewhat.

12 Q. (By Ms. Hamill) Somewhat. To your knowledge,
13 did that committee ever investigate social media
14 companies?

15 A. I have no idea.

16 Q. So when you worked for Schiff's office, were
17 you ever involved in any sort of investigation of social
18 media companies?

19 A. No. I was a very junior member of the team.

20 Q. Were you aware of any investigations of social
21 media companies during your time working for Schiff?

22 A. I was not, no.

23 Q. Are you familiar with Paul Sperry?

24 A. No.

25 Q. How often have you consulted with Patrick

Brett Morrow

1 Boland regarding Department of Public Health business?

2 A. I think this may have been the only time.

3 Q. Why did you feel that this particular matter
4 that you discussed in this e-mail was important enough
5 to involve Congressman Schiff's office?

6 MR. RAYGOR: Objection. Lacks foundation that
7 it involved his office.

8 THE WITNESS: Personally, I was beginning to
9 get nervous and scared.

10 Q. (By Ms. Hamill) About what?

11 A. My personal safety and my wife's safety.

12 Q. Is there any other reason?

13 A. Generally, also, as I mentioned, the amount of
14 intimidating language and misinformation and harassment
15 happening on our channels.

16 Q. So let's move to the second sentence of this
17 e-mail: "I'm wondering if you can point me in the right
18 direction. I am the Chief Communications Officer for
19 the L.A. County Department of Public Health, and we are
20 likely going to bring back indoor masking.

21 Unfortunately, this has led to constant harassment and
22 tweets from several antimaskers who are targeting our
23 Public Health account and my personal Twitter account
24 with account flooding me with dozens of hashtags and
25 even using intimidating language by making references to

1 my pregnant wife."

2 Do you recall that being accurate in terms of
3 what you sent to Ms. Culbertson?

4 A. Yes, I see it here.

5 Q. Okay.

6 MR. RAYGOR: And just for the record, the
7 sentence concludes with a link to a Twitter post, it
8 looks like.

9 MS. HAMILL: Yes, there are hyperlinks and
10 links provided in this text.

11 Q. (By Ms. Hamill) Did you speak to anyone else
12 about these issues before reaching out to
13 Ms. Culbertson?

14 MR. RAYGOR: Can you read back the question,
15 please.

16 (Record read.)

17 MR. RAYGOR: Vague and ambiguous as to what you
18 mean by "these issues."

19 THE WITNESS: I may have told our team about
20 some of these issues or discussed with our team.

21 Q. (By Ms. Hamill) Your communications team?

22 A. Correct, yes.

23 Q. Anyone else?

24 A. I don't remember.

25 Q. Did you seek legal advice before sending this

Brett Morrow

1 e-mail? And I don't want to know what the advice was.

2 A. No, I did not.

3 Q. What action did you hope Ms. Culbertson would
4 take in response to this e-mail?

5 A. I was hoping that she would put me in contact
6 with someone on her government relations team.

7 Q. And what would you hope that her government
8 relations team would do?

9 A. Determine whether or not their terms and
10 policies were being violated.

11 Q. Did you think you were asking Ms. Culbertson to
12 do something that was a routine part of her job, or was
13 it a special favor?

14 A. I don't know what specifically her job
15 entailed, so I can't answer that.

16 Q. So in this e-mail as we've -- as I read, you
17 state that your personal Twitter account had been
18 targeted by antimaskers, included a hyperlink. Did that
19 hyperlink go to a Twitter account with the handle
20 Morrow_Brett?

21 A. It did, yes. I'm sorry. Yes, it did.

22 Q. And Morrow_Brett is your personal Twitter
23 account.

24 A. It is, yes.

25 Q. What topics do you usually tweet about from

Brett Morrow

1 **that account?**

2 A. Mostly basketball, food, movies, shoes.

3 **Q. Why did these tweets that you mention in your**
4 **e-mail to Ms. Culbertson bother you?**

5 A. I think because my wife wasn't involved in any
6 of this. And if I remember correctly, we had not really
7 shared publicly that she was pregnant, so it made me
8 feel as though people were digging for information about
9 me, and I was concerned. But additionally just
10 remaining concerned about, you know, the -- how our
11 channels were being used. Not just mine personally,
12 what I was dealing with personally, but also our
13 channels too.

14 **Q. Did the issues you've complained about in this**
15 **e-mail interfere with your personal enjoyment of**
16 **Twitter?**

17 A. Yes.

18 **Q. And this e-mail was sent from your lacounty.gov**
19 **e-mail address. That's your work e-mail address;**
20 **correct?**

21 A. Correct, yes.

22 **Q. Okay.**

23 And the signature block, which is on Page 6 of
24 this exhibit, identifies you as Chief Communications
25 Officer; correct?

Brett Morrow

1 A. Correct, yes.

2 Q. So you were acting in your capacity as an L.A.
3 County Department of Public Health employee when you
4 sent the e-mail?

5 A. Correct, yes.

6 Q. Is protecting your enjoyment of your personal
7 use of Twitter part of your job duties as an employee of
8 L.A. County?

9 A. No.

10 Q. And to your knowledge, is protecting the
11 enjoyment of the personal use of Twitter --

12 (Stenographer clarification.)

13 Q. (By Ms. Hamill) To your knowledge, is
14 protecting the enjoyment of the personal use of Twitter
15 of former employees of Congressman Schiff's office part
16 of Patrick Boland's job duties?

17 MR. RAYGOR: Can you read back the question.
18 It's kind of convoluted.

19 THE WITNESS: I'm not sure I understand either.

20 Q. (By Ms. Hamill) Is it -- in your knowledge, is
21 it part of Patrick Boland's job duties to protect your
22 personal use and enjoyment of Twitter?

23 A. I don't know what his specific job duties are,
24 but I would say no.

25 Q. Did you take screenshots or otherwise document

Brett Morrow

1 the tweets that you reference in this e-mail to
2 Ms. Culbertson?

3 A. I don't believe so.

4 Q. Did you believe any of the tweets you
5 referenced in this e-mail violated any criminal laws?

6 A. I don't know. I don't know specifics on
7 criminal law.

8 Q. Did you contact law enforcement?

9 A. I did not, no.

10 Q. And so you don't recall using the report tweet
11 function to report any of these tweets --

12 MR. RAYGOR: Asked and answered.

13 Q. (By Ms. Hamill) -- correct?

14 A. I don't remember.

15 Q. You don't remember.

16 So in this e-mail, you state that the County's
17 decision to bring back a mask mandate had led to
18 constant harassment and tweets from several antimaskers.

19 So in addition to tweets, what form did this
20 harassment take?

21 MR. RAYGOR: Just a second. Can you read back
22 the question, please.

23 (Record read.)

24 MR. RAYGOR: That's fine. Mischaracterizes the
25 e-mail. Lacks foundation as to whether there had been a

Brett Morrow

1 County decision.

2 Q. (By Ms. Hamill) Had there been a County
3 decision to bring back a mask mandate at that point?

4 A. At this time, no, I don't believe so.

5 Q. Why did you say, "We are likely going to bring
6 back indoor masking"?

7 A. If I remember correctly, the numbers at that
8 time may have still been increasing, but they were
9 possibly plateauing. At times, the -- the team will
10 also do some kind of projections as well. I'm not sure
11 how exactly that's calculated.

12 Q. Did Dr. Ferrer tell you, before you sent this
13 e-mail, that they were likely going to bring back indoor
14 masking?

15 A. Not that I remember.

16 Q. Why would you tell Twitter that you were likely
17 going to bring back indoor masking?

18 A. I don't know. I'm assuming because at that
19 time it was likely based upon the numbers --

20 (Stenographer clarification.)

21 THE WITNESS: -- and the science.

22 Q. (By Ms. Hamill) So let's go back to my
23 question.

24 A. Um-hum.

25 Q. In the e-mail, you state that the County's

1 decision to bring back a mask mandate had led to
2 constant harassment and tweets from several antimaskers.

3 In addition to tweets, what form did this
4 harassment take?

5 MR. RAYGOR: Objection. Once again, it's
6 mischaracterizing the e-mail. It doesn't state anything
7 about a County decision.

8 THE WITNESS: I'm not sure I understand the
9 question.

10 Q. (By Ms. Hamill) In addition to tweets, what
11 form did this harassment take?

12 A. I think we also received phone calls.

13 Q. At the County?

14 A. Yes.

15 Q. What did the phone calls say?

16 A. I think there were some that were just cursing
17 a lot, making personal attacks as well.

18 Q. Did you answer the phone personally?

19 A. No.

20 Q. Who usually answers the phone?

21 A. Oh, I don't know.

22 Q. But they're on your team?

23 A. Not necessarily. There are voicemails that are
24 forwarded.

25 Q. Did you listen to the voicemails?

Brett Morrow

1 A. At times, I've listened to voicemails, yeah.

2 Q. I'm just wondering how you knew about the
3 harassment that you complained about to Twitter.

4 A. I had heard a voicemail.

5 Q. You had heard a voicemail.

6 A. Specifically with regards to the phone calls,
7 correct.

8 Q. Okay.

9 And what did that voicemail say?

10 A. I don't know if I can say. Can I curse?

11 Q. Yeah.

12 A. It basically just kept saying "fuck you" over
13 and over for maybe a minute or two, and calling
14 us communists, fascists, and other kind of intimidating
15 language.

16 Q. Specifically to you or to the department, or
17 who was this directed to?

18 A. I don't remember.

19 Q. And all of this harassment was from, quote,
20 "antimaskers"?

21 MR. RAYGOR: Calls for speculation.

22 THE WITNESS: I don't know their personal
23 stances.

24 Q. (By Ms. Hamill) I'm just wondering -- you
25 characterized the harassment as coming from antimaskers

1 in this e-mail. So I'm wondering how you made that
2 determination.

3 A. I think, typically, they were saying that they
4 didn't want us to bring masks back.

5 Q. So anyone who didn't want to bring masks back
6 is an antimasker?

7 A. I wouldn't say necessarily that. Someone could
8 be pro-masks and not want it to be required.

9 Q. Is being an antimasker a bad thing, in your
10 opinion?

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

12 Q. Okay.

13 So going back to Page 5 of this exhibit, at the
14 top -- I'm going to have to turn the page to Number 4 to
15 see that this e-mail was sent Friday, July 22nd at 2:55
16 p.m., and you say "Hi, Lauren. Just wanted to follow up
17 on this. Appreciate your assistance."

18 So you hadn't gotten any response from Lauren
19 since your initial e-mail on the 20th?

20 A. Correct.

21 Q. Okay.

22 And then on the 25th -- this is on Page 4 of
23 this exhibit -- Lauren Culbertson responds: "Can you
24 please respond to him per standard process. Thanks."

25 And the next e-mail in this chain just above

1 that is from Twitter Government and Politics, which is
2 gov@twitter.com, to you, Brett Morrow, CC'ing Lauren
3 Culbertson, and it says: "Hi, Brett. Thank you for
4 reaching out. When you have a chance, could you file a
5 private information report," and it provides a link.
6 And it says: "After completing the form, please forward
7 the ticket you are issued to us: gov@twitter.com. We
8 will expedite it from there."

9 Did you follow the instructions you received in
10 this e-mail?

11 A. I don't remember.

12 Q. So going to Page 3 of this exhibit, at the
13 bottom, on July 26th at 2:54, you say: "Thank you so
14 much. A few other items have come up that require
15 urgent action. There is a lot of misinformation going
16 around L.A. County and upcoming mask requirements.
17 Opponents are spreading the following information:
18 Dr. Barbara Ferrer is a fake doctor. L.A. County is
19 lying about hospitalization numbers. CDC is not
20 recommending masks. For example" -- and then you link
21 to a John Phillips tweet -- "and masks are not effective
22 for adults or children. There are many more. I have
23 reported a few but have not heard back if action was
24 taken. Is it possible I can send links for misleading
25 info to expedite? Any other options?"

Brett Morrow

1 Do you remember writing that e-mail?

2 MR. RAYGOR: Lacks foundation that there is a
3 John Phillips tweet in here.

4 MS. HAMILL: Well, let's go up to the number --
5 the first bullet point on Page 4. CDC is not
6 recommending masks. For example,
7 [HTTPS://twitter.com/johnnydontlike](https://twitter.com/johnnydontlike).

8 Do you know that Twitter account?

9 MR. RAYGOR: First of all, mischaracterizes.
10 Those are forward slashes, not backslashes, and it
11 doesn't say Phillips; just Johnny don't like.

12 Q. (By Ms. Hamill) Are you familiar --

13 MR. RAYGOR: Lacks foundation.

14 Q. (By Ms. Hamill) Are you familiar with the
15 Johnnydontlike Twitter account?

16 A. I am, yes.

17 Q. Do you know who it belongs to?

18 A. John Phillips.

19 Q. And who is John Phillips?

20 A. I believe he's a radio broadcaster.

21 Q. And what are John Phillips' political leanings?

22 MR. RAYGOR: Objection. Calls for speculation.

23 THE WITNESS: I don't know. I don't listen to
24 him.

25 Q. (By Ms. Hamill) You don't listen to John

1 **Phillips?**

2 A. I do not.

3 MR. RAYGOR: Asked and answered.

4 **Q. (By Ms. Hamill) But do you know about his**
5 **Twitter account.**

6 A. I do, yes.

7 **Q. Why?**

8 A. I believe he's tweeted at me several times.

9 **Q. Do you follow John?**

10 A. I don't -- I don't think I do.

11 **Q. Do you recall writing this e-mail?**

12 A. Yes.

13 **Q. So you referred to the items listed in these**
14 **bullet points as requiring urgent action. Why were**
15 **these items urgent?**

16 A. I don't remember specifically, but I believe
17 there was a massive uptick in the spreading of these
18 pieces of misinformation at the time.

19 **Q. Did you believe that the tweets you referenced**
20 **presented an imminent danger to the public?**

21 MR. RAYGOR: Objection. Vague and ambiguous as
22 to what you mean by "imminent danger to the public."

23 THE WITNESS: Yeah, I don't know what you mean
24 by "imminent danger."

25 **Q. (By Ms. Hamill) Imminent danger means people**

1 are in immediate danger. There's a serious risk, and
2 people are in danger. So you stated that these require
3 urgent action, and I'm wondering why were they so
4 urgent? Were they imminently dangerous? Were people at
5 risk?

6 A. I'm not sure how to answer that. I don't know
7 how to answer -- I don't know.

8 Q. What action were you hoping Twitter would take
9 in response to this particular e-mail?

10 A. I was hoping that they would look into whether
11 or not they violated their terms and conditions.

12 Q. But you'd already reported the tweets using the
13 report function; correct?

14 A. I believe so, yes.

15 Q. Did you appeal after your reports were not
16 successful?

17 MR. RAYGOR: Objection. Lacks foundation that
18 the reports were not successful.

19 THE WITNESS: I don't think I've ever appealed.

20 Q. (By Ms. Hamill) So you reported these tweets.
21 No action was taken. You told Twitter about them and
22 asked if they could expedite. So what were you hoping
23 Twitter would do?

24 A. Expedite their process. I think, at that
25 point, it had been almost a week, so expedite their

Brett Morrow

1 process of review.

2 Q. Do you recall if any of these tweets that you
3 mentioned here ultimately were taken down or removed?

4 A. I don't -- I don't know. I don't think so.

5 Q. Did you attempt to provide correct information
6 in response to any of these tweets on Twitter?

7 MR. RAYGOR: Vague and ambiguous as to what
8 you're referring to by "these tweets."

9 THE WITNESS: I don't believe so.

10 Q. (By Ms. Hamill) Can you explain how the
11 comment that Dr. Barbara Ferrer is a fake doctor is an
12 example of misinformation that required urgent action.

13 A. I think it sought to undermine her credibility
14 as a Ph.D. and spread misinformation about her ability
15 to lead the response.

16 (Stenographer clarification.)

17 Q. (By Ms. Hamill) Can you explain how the
18 statement that L.A. County is lying about
19 hospitalization numbers is an example of misinformation
20 that requires urgent action.

21 A. It was in reference to the severity of the
22 pandemic at the time.

23 Q. And then going to the first bullet point on
24 Page 4 of this exhibit, the Phillips tweet, you said,
25 "CDC is not recommending masks. For example" -- and

Brett Morrow

1 then you link to the John Phillips tweet -- and you say
2 "which is false, based on the CDC info here." And you
3 provide a link to CDC data. "The user is using an old
4 article from March and trying to pass it off as
5 current."

6 Do you have a basis for believing that
7 Mr. Phillips was intentionally trying to deceive people?

8 A. If I remember the tweet correctly, it alluded
9 to something saying that the CDC, at that time, was not
10 recommending masks, and it was post to an article from
11 NBC news, if I remember correctly, and it had not been
12 updated since March, and so it was referencing old data,
13 if I remember correctly.

14 Q. And then the last bullet point says, "Masks are
15 not effective for adults or children." And you cite
16 that as an example of misinformation that required
17 urgent action.

18 Did you have proof at the time that masks are
19 effective for adults and children?

20 A. I rely on our public health experts to inform
21 that information -- provide that information.

22 Q. And so this statement was misinformation,
23 because it conflicted with what the Department of Public
24 Health had publicly stated.

25 A. I don't think just us, but I think many other

Brett Morrow

1 Public Health experts.

2 Q. When you reported these tweets using the
3 Twitter app, did you receive any e-mail acknowledgments
4 from Twitter that your reports were received?

5 A. I don't remember.

6 Q. Do you recall how many tweets you reported for
7 misinformation?

8 A. I don't remember.

9 Q. And so the second to last sentence of your
10 e-mail says: "Is it possible I can send links or
11 misleading info to expedite? Any other options?"

12 What other options were you hoping for?

13 A. I don't know. The process just seemed
14 cumbersome.

15 Q. The Twitter process?

16 A. Their review process, yes.

17 Q. It seemed cumbersome?

18 A. Cumbersome, and I think I -- or I think there
19 were errors, as well, with their portal or the process
20 too -- that we were receiving.

21 Q. There were errors --

22 MR. RAYGOR: Can you keep your voice up.

23 THE WITNESS: I apologize. I believe, if I
24 remember correctly, when one of those few were being
25 flagged, we were getting errors, and so we didn't know

Brett Morrow

1 if they were going through or not either.

2 Q. (By Ms. Hamill) Let's -- let's back up,
3 because I want to understand this whole process. You
4 were flagging tweets to a portal?

5 A. Or whatever the process was embedded on their
6 website. I don't know if you can technically call it a
7 portal.

8 Q. So are you talking about clicking on the three
9 little dots, and then you click "report tweet" on the
10 tweet itself? Is that what you're --

11 A. Correct, yes.

12 Q. Okay.

13 A. Sometimes I was freezing or not necessarily
14 going through. We were getting errors.

15 Q. So you were concerned that Twitter wasn't
16 receiving your reports?

17 A. I think that may have been part of it too.

18 Q. So were you ultimately hoping that Twitter
19 would take down all of these offensive tweets?

20 A. Not necessarily. I wanted them to just go
21 through their process.

22 Q. Were you satisfied with the outcome of your
23 reports to Twitter?

24 A. I don't remember.

25 Q. Do you wish Twitter handled things differently

1 with respect to these particular tweets?

2 A. I don't know how to answer that. I don't think
3 so.

4 MS. HAMILL: I'm not through this set of
5 documents that I was hoping to get through before lunch,
6 but I'm really hungry, so are we okay taking a break for
7 lunch and coming back in -- can we do 45 minutes?

8 MR. RAYGOR: I don't eat lunch, so it's up to
9 you guys.

10 MS. HAMILL: We can be shorter if you want, but
11 there are Mexican -- Mexican restaurants -- sorry.
12 Let's --

13 THE VIDEOGRAPHER: Off the record?

14 MS. HAMILL: Well, I'll go -- I'll explain the
15 options later, but do you want to have a full lunch, or
16 do you -- what's your hope? I have a lot to get
17 through, unfortunately. I'm trying to go as quickly as
18 I can. Definitely need to be done before 5:00, and will
19 be, but the shorter lunch we take, the sooner we'll be
20 done.

21 THE WITNESS: I'm fine with a short lunch,
22 yeah.

23 MS. HAMILL: Okay. All right.

24 So let's go off the record.

25 THE VIDEOGRAPHER: We're off the record. The

Brett Morrow

1 time is 12:57 a.m. -- p.m. Pacific Time.

2 (Lunch recess from 12:57 p.m. to 1:45 p.m.)

3 THE VIDEOGRAPHER: We're back on the record.

4 The time is 1:45 p.m. Pacific Time.

5 Q. (By Ms. Hamill) All right.

6 So let me direct your attention back to Exhibit
7 13, Page -- what's marked as Page 5 at the bottom right.
8 And going down to the initial e-mail from you to Lauren
9 Culbertson on July 20th. You mentioned that -- it says,
10 "With account flooding me with dozens of hashtags."

11 Is "account flooding" a term?

12 A. I'm not sure what I mean. I think there's a
13 typo in there somewhere.

14 Q. Okay.

15 A. Yeah. I'm not quite sure what that means.

16 Q. Were you being flooded with dozens of hashtags?

17 A. I'm assuming so, but I'm assuming that's also
18 applies to the Public Health Department account.

19 Q. What does that mean, exactly?

20 A. Users can insert hashtags in their tweets to --
21 I'm not quite sure how to describe it. You can click on
22 a hashtag to see a conversation happening within that
23 specific hashtag that is used.

24 Q. And so you felt that you were being targeted
25 with dozens of tweets with the same hashtag, or were

1 there dozens of different hashtags that were being used
2 to attack --

3 MR. RAYGOR: Objection. Mischaracterizes the
4 document.

5 THE WITNESS: I don't remember.

6 Q. (By Ms. Hamill) Do you recall what any of the
7 hashtags were?

8 A. No.

9 Q. So on Page 4 -- it's marked as Page 4 on the
10 bottom right of this exhibit -- the middle e-mail in
11 this thread from Twitter Government and Politics to
12 Brett Morrow on July 26th at 11:43 a.m., this
13 gov@twitter.com tells you to complete a form for a
14 private information report, and then to forward the
15 ticket to gov@twitter.com, and they will expedite it.

16 Did you file a private information report?

17 A. I don't --

18 MR. RAYGOR: Asked and answered.

19 THE WITNESS: I don't remember.

20 Q. (By Ms. Hamill) And then on what's marked as
21 Page 3 of this exhibit, there is an e-mail from Twitter
22 Government and Politics sent Tuesday, July 26th at
23 1:36 p.m. to Brett Morrow, and it says, "Please file an
24 abuse report here and send us the case number you
25 receive so we can escalate it. If you consider this to

1 be a serious threat, we recommend contacting the
2 authorities. They could request further information
3 following our guidelines for law enforcement."

4 And you've stated before that you never
5 contacted law enforcement on behalf of the County of
6 L.A.; is that -- that's still correct?

7 MR. RAYGOR: Objection. Mischaracterizes his
8 testimony. I think he stated he didn't recall if he
9 ever did.

10 THE WITNESS: I don't recall. I don't
11 remember.

12 Q. (By Ms. Hamill) You also state that you didn't
13 contact law enforcement.

14 A. I don't remember.

15 Q. So it's possible you did contact law
16 enforcement.

17 A. I don't think I did.

18 Q. Did you fill out an "abusive user" report?

19 A. I don't remember.

20 Q. And then on what is marked as Page 2, there is
21 another e-mail from gov@twitter.com to you that was sent
22 August 9th, 2022, at 9:16 a.m., and this one says:
23 "File an impersonation report. After completing the
24 form, you'll receive a confirmation e-mail with a case
25 number in the subject line. Please send us that number,

1 and we will expedite the case."

2 Did you file an impersonation report?

3 A. I believe we did.

4 Q. And what was the outcome of that?

5 A. We received a reply from Twitter, which is
6 on -- I think this is it on Page 1.

7 Q. And is this -- I'm looking at Page 1 of Exhibit
8 13.

9 A. Yes.

10 Q. There appears to be a very tiny screenshot
11 right above where it says: "Hello. We've received your
12 report."

13 Do you see that little tiny screenshot?

14 A. Um-hum.

15 Q. Do you know what that is?

16 A. No idea.

17 Q. On your end, could you please check in this
18 e-mail to see if you can pull that screenshot and
19 enlarge it so we can see what it says?

20 A. Sure.

21 Q. Okay. Thank you.

22 And then on August 10th, 2022, at 3:34 p.m.

23 Twitter Government and Politics sends an e-mail to Brett
24 Morrow saying: "Yes, thank you for the case number. We
25 will now move for further review."

Brett Morrow

1 MS. HAMILL: I'm going to mark as Exhibit 14 a
2 thread of e-mails between Mr. Morrow and Twitter.

3 (Exhibit 14 marked for identification.)

4 MR. RAYGOR: Obviously, Brett, if you do find
5 that tiny little thumbnail, you know, something that's
6 readable, send it to me, not to Ms. Hamill directly.

7 THE WITNESS: Okay.

8 Q. (By Ms. Hamill) So I'm looking on Page 12 of
9 this document. And there's another tiny little
10 thumbnail on the bottom left.

11 A. Um-hum.

12 Q. Can you do the same search and blow that up
13 and provide it to your attorney.

14 A. Sure.

15 Q. Thank you.

16 Have you seen this document before; what's been
17 marked as Exhibit 14?

18 A. I have, yes.

19 Q. And do you recognize this as being an e-mail
20 exchange between you and Twitter?

21 A. Yes.

22 Q. And it looks very similar to Exhibit 13. It
23 appears the only difference is that it has an additional
24 one, two e-mails --

25 A. Um-hum.

Brett Morrow

1 Q. -- on the first page, which is marked as Number
2 7 on the bottom right; is that correct?

3 A. Yes. Yes.

4 Q. Okay.

5 So it looks like, on Page 7 of Exhibit 14, on
6 August 10th, 2022, at 11:43, you say, "Thank you. When
7 might you have an update?"

8 And then on the same day, at 7:56 p.m., Twitter
9 responds and says, "Hello, Brett. Our team has
10 determined that the account is not compliant with our
11 policies and will look to solve this issue. Thanks."

12 And so this is referring to the "deceptive
13 identity" account; is that correct?

14 A. That's my understanding, yes.

15 Q. Did you receive any e-mails similar to this for
16 the other reports which were for abusive user and
17 private information?

18 (Stenographer clarification.)

19 THE WITNESS: I don't believe so.

20 MS. HAMILL: I'm going to mark as Exhibit 15 a
21 portion of a Twitter thread between Elex Michaelson and
22 Brett Morrow.

23 (Exhibit 15 marked for identification.)

24 MS. HAMILL: And I'll let you review this.
25 Just look up when you're finished.

Brett Morrow

1 THE WITNESS: Thank you.

2 Q. (By Ms. Hamill) Have you seen this exchange
3 before?

4 A. I have, yes.

5 Q. And is this an exchange between you on your
6 personal account and Elex Michaelson?

7 A. Yes.

8 Q. Who is Elex Michaelson?

9 A. He's a reporter.

10 Q. A reporter for?

11 A. Fox 11 News.

12 Q. Fox 11 News.

13 So did you respond to Elex's comment here from
14 your own personal account?

15 A. I did, yes.

16 Q. Why did you respond from your personal account
17 and not from the County's account?

18 A. I think it was me personally speaking. My
19 capacity engaging with media is not something we do
20 through our Public Health social media accounts,
21 typically, on a public basis, I guess you could say.

22 Q. So I want to make sure I'm understanding you.

23 A. Um-hum.

24 Q. So the Department of Public Health -- County
25 Department of Public Health does not engage with

Brett Morrow

1 **reporters on Twitter.**

2 A. There have been instances where reporters may
3 send us a message on Twitter, and then we direct them to
4 either the media inbox or something else, but not on our
5 timeline through tweets.

6 **Q. Why is that?**

7 A. Because we view as our platform is just to
8 provide information and not necessarily engage with
9 media on it.

10 **Q. So were you acting in your personal capacity or**
11 **your official capacity when you sent this tweet?**

12 A. Well, it's about work, but it is at 1:46 in the
13 morning, so I'm assuming I was at home. I'm not quite
14 sure how to answer that, but because it involves work, I
15 would say probably in my professional capacity.

16 **Q. What is your general bedtime? When do you go**
17 **to sleep?**

18 A. Whenever I'm tired and I go to sleep. It
19 varies. It varies. Whenever I'm done with work and --
20 yeah.

21 **Q. So how did you find this Twitter thread? Were**
22 **you monitoring Elex Michaelson's tweets?**

23 A. Oh, I don't remember.

24 **Q. So Elex Michaelson, in this tweet, says, "We've**
25 **invited Barbara Ferrer, Muntu Davis, and other reps from**

1 L.A. County Health on our show for months, and they
2 refuse to come on. We've been consistently asking
3 questions about the need for mask mandates to local
4 officials. I hope you watch."

5 And your response was: "Your co-anchor
6 @MarlaTellez shows up to our weekly press briefing and
7 consistently asks Dr. Ferrer questions, tough questions
8 at that. Often, first or second in line too. We talk
9 semi-regularly and now established a good working
10 relationship."

11 Why did you feel the need to send this reply to
12 Mr. Michaelson?

13 A. I didn't feel as though his criticism or his
14 framing was fair. It made it sound as though Fox 11 had
15 no access to ask us questions when, in fact, they had
16 access on a weekly basis to ask us questions.

17 Q. Did you ask him to delete that tweet?

18 A. I did not, no, but he did delete it.

19 MS. HAMILL: I'm going to have marked as
20 Exhibit 16 a Twitter thread between Dr. Klausner, Brett
21 Morrow, and Elex Michaelson.

22 (Exhibit 16 marked for identification.)

23 Q. (By Ms. Hamill) And I'll give you a minute to
24 look this over.

25 A. I remember it.

Brett Morrow

1 Q. You remember this?

2 A. Yes.

3 Q. So it looks like this thread begins with
4 Dr. Klausner quote-tweeting Phil Kerpen, who tweeted:
5 "L.A. update. As of this morning, we have no one in the
6 hospital who had pulmonary disease due to COVID. Nobody
7 in the hospital. We have 24 people who have tested
8 positive for COVID, but nobody -- nobody who had
9 COVID-19 disease as we would see in the past."

10 And that was posted on July 16th of 2022. And
11 it looks like he was sharing a video from the L.A.
12 County USC Medical Center, and that's Paul Holtom, the
13 epidemiologist.

14 Do you recall ever watching that video?

15 A. I do, yes.

16 Q. And what were your thoughts about that video?

17 MR. RAYGOR: Objection. Lacks foundation --
18 (Stenographer clarification.)

19 MR. RAYGOR: -- that it's Dr. Holtom.

20 THE WITNESS: I think -- I don't remember
21 specifically, but I think it was --

22 (Stenographer clarification.)

23 THE WITNESS: I was worried about his
24 characterization of the pandemic at the time.

25 Q. (By Ms. Hamill) And Dr. Klausner's quote tweet

Brett Morrow

1 on July 16th, 2022, says, "That's the head of infectious
2 diseases at L.A. County Hospital. Hard to understand
3 why messaging @LAPublicHealth and L.A. Times is
4 completely opposite."

5 And he tags a number of news outlets. And this
6 is what led to the exchange between you and Elex
7 Michaelson, and this shows that Elex Michaelson tweet
8 was deleted, as you mentioned before. It shows your
9 response that was present in Exhibit 15, and then your
10 follow-up, which was, "You and I have talked maybe once
11 or twice in two-plus years and most recently when CDC
12 director was in town, and I had to introduce myself.
13 Why is that, Elex?"

14 Why did you feel the need to post that tweet?

15 MR. RAYGOR: Objection. Lacks foundation that
16 the exchange between Dr. Klausner and Phil Kerpen led to
17 the exchange -- or "caused" I think you used the word --
18 exchange between Mr. Morrow and Mr. Michaelson.

19 THE WITNESS: Because I knew that this was
20 Marla's beat, and Elex was making assumptions, perhaps
21 correctly or incorrectly, that we weren't providing
22 access. I'm not sure how to say this eloquently, but I
23 think he was talking a little out of his lane because it
24 wasn't necessarily his beat.

25 Q. (By Ms. Hamill) So when the CDC director was

Brett Morrow

1 **in town, you met with Elex Michaelson?**

2 A. I wouldn't say "met with." He was there doing
3 a interview, and we chatted, and I introduced myself to
4 him and met him for the first time.

5 Q. **Prior to posting -- and just to clarify, these**
6 **tweets from you are in response to this thread that**
7 **originated with the Phil Kerpen and the Dr. Klausner**
8 **quote tweet; is that right?**

9 A. It looks as though that's the original thread,
10 but I wasn't responding to them; I was just responding
11 to Elex.

12 Q. **Prior to you posting these responses on July**
13 **16th to Mr. Michaelson, had you ever received any**
14 **replies to your personal Twitter account critical of**
15 **L.A. County Department of Public Health policy?**

16 A. I don't remember.

17 Q. **Had your personal account been tagged in any**
18 **critical tweets prior to July 16th of 2022?**

19 MR. RAYGOR: Calls for speculation.

20 THE WITNESS: I don't remember.

21 MS. HAMILL: I'm going to mark as Exhibit 17 a
22 baby announcement from Brett Morrow's Instagram account.

23 (Exhibit 17 marked for identification.)

24 Q. **(By Ms. Hamill) So in your e-mail exchange**
25 **with Twitter -- and I'm going back to Exhibit 14,**

Brett Morrow

1 Page -- what's marked as Page 12 on the bottom right --
2 you mentioned that: "The antimaskers are using
3 intimidating language by making references to my
4 pregnant wife," and you refer to a Twitter post from
5 Britches Fuzzy, and then you follow up that same day,
6 about 20 minutes later, saying, "I will also add that my
7 wife's pregnancy has never been mentioned on Twitter,
8 and both of our other social media accounts, such as
9 Instagram, are private."

10 So was it a secret that your wife was pregnant
11 on July 20th, 2022?

12 A. It wasn't a secret beyond what we had told
13 families and friends and followers on our Twitter -- on
14 our personal social media accounts.

15 MS. HAMILL: And I'll have marked as Exhibit 18
16 a baby announcement from Meesh Morrow.

17 (Exhibit 18 marked for identification.)

18 Q. (By Ms. Hamill) And so Exhibit 17 and Exhibit
19 18 are Instagram posts from your account, which is Brett
20 Morrow, and your wife's account, which is Meesh Morrow,
21 and they're dated June 18th, 2022.

22 Do you recognize these?

23 A. I do, yes.

24 Q. Okay.

25 And these accounts are currently public. Are

Brett Morrow

1 you aware of that?

2 A. They are not.

3 Q. I don't follow you on Instagram; correct?

4 A. You do not, no. I believe you're correct.

5 Q. We're not Instagram friends, but I was able to
6 get both of these documents from your Instagram, because
7 they're both public.

8 MR. RAYGOR: Objection. Lacks foundation.

9 THE WITNESS: We recently made them private --
10 or agreed to make them private.

11 Q. (By Ms. Hamill) And I understand the sensitive
12 nature of this, and I'm not going to ask any questions
13 about the pregnancy, but I do think it's important to
14 note the public nature of these announcements in June of
15 2022 and how -- I'm just not sure how to reconcile that
16 with your statements to Twitter in July that this was
17 private information.

18 MR. RAYGOR: Objection. You already noted
19 that, and there's no question pending.

20 There's nothing -- she hasn't asked you
21 anything.

22 Q. (By Ms. Hamill) So how -- how would one
23 reconcile the statements that you made in July to
24 Twitter that this information was private against the
25 public nature of the Instagram posts?

Brett Morrow

1 MR. RAYGOR: Objection. Lacks foundation that
2 it was public at that time.

3 THE WITNESS: It is possible to -- from July
4 2022 until whenever you took these screenshots to make
5 your account public and go back to private.

6 Q. (By Ms. Hamill) Do you believe that Britches
7 Fuzzy obtained the information about your wife's
8 pregnancy through some sort of nefarious avenue?

9 MR. RAYGOR: Calls for speculation.

10 THE WITNESS: I have no idea.

11 Q. (By Ms. Hamill) So was there any public
12 information about your wife's pregnancy at that point in
13 time, July of 2022?

14 A. Not from us.

15 Q. So what is your theory as to how this
16 information was obtained?

17 MR. RAYGOR: Calls for speculation.

18 THE WITNESS: I have no idea.

19 Q. (By Ms. Hamill) But you deny that your
20 Instagram accounts were public at the time?

21 A. To my recollection, yes.

22 Q. Did Patrick Boland ever tell you about certain
23 terminology to use with Twitter that would increase the
24 likelihood of a post being removed?

25 A. No.

Brett Morrow

1 MS. HAMILL: I'm going to mark as Exhibit 19
2 Brett Morrow's personal Twitter account profile.

3 (Exhibit 19 marked for identification.)

4 Q. (By Ms. Hamill) Do you recognize this?

5 A. I do, yes.

6 Q. Is this a depiction of your profile on Twitter?

7 A. It is, yes.

8 Q. And what do you mean when you say: "You still
9 rock my khakis with a cuff and a crease"?

10 A. It's a line from a song.

11 Q. What song?

12 A. I believe it's "Still D.R.E." by Dr. Dre.

13 Q. And you identify yourself in your bio as Chief
14 Communications Officer at L.A. Public Health; is that
15 correct?

16 A. Correct.

17 Q. So do you use this personal account for
18 business purposes?

19 A. Not really. Rarely.

20 Ms. HAMILL: I'll have marked as Exhibit 20 a
21 Twitter exchange between Tommy Vietor and Brett Morrow.

22 (Exhibit 20 marked for identification.)

23 Q. (By Ms. Hamill) Do you recognize this
24 document?

25 A. I do.

Brett Morrow

1 Q. Do you recall this exchange?

2 A. I recall --

3 (Stenographer clarification.)

4 THE WITNESS: I recall tweeting this, but I
5 wouldn't call it an exchange, because he didn't respond.

6 Q. (By Ms. Hamill) Who is Tommy?

7 A. He's a podcaster.

8 Q. So Tommy says, "Remarkable that not a single
9 aspect of L.A.'s COVID response is going well. Not
10 one."

11 And then you respond from your personal
12 account: "If only someone from the Department of Public
13 Health reached out to you to give you some context. Oh
14 wait, that happened, and you read the DM but didn't
15 respond or reach out."

16 What are you referring to?

17 A. I had sent Tommy a message offering to discuss
18 some of his recent criticism on his podcast.

19 Q. Had you sent that message from your personal
20 account or from the L.A. County account?

21 A. I don't remember.

22 Q. And then you follow up with: "TWO MONTHS AGO,"
23 in all caps, "I'll add." And you didn't receive any
24 further response?

25 A. I never did, no.

Brett Morrow

1 Q. So were you acting in a personal or official
2 capacity when you responded to Tommy in this tweet?

3 A. It's regarding work, so I would say official
4 capacity, but on my personal account.

5 Q. If a member of the public wanted to contact you
6 in your role as communications officer, should they
7 reach out to your personal account or to the County's
8 Twitter account?

9 A. The public doesn't really reach out to me. I
10 don't interface with the public a whole lot. Probably
11 the best would be through the official capacity. I
12 don't check my personal social media accounts very
13 often.

14 Q. Have you blocked any Twitter accounts from your
15 personal account?

16 A. Not that I remember.

17 Q. Have you ever made that personal account
18 private?

19 A. At times, yes.

20 Q. What is the e-mail address associated with the
21 Morrow_Brett Twitter account?

22 A. I believe it's my personal e-mail address.

23 Q. And what is the e-mail address associated with
24 the L.A. County Department of Public Health Twitter
25 account?

Brett Morrow

1 A. I don't remember. It may be the media inbox
2 e-mail address.

3 Q. It's not.

4 MR. RAYGOR: Don't guess.

5 THE WITNESS: I don't remember. Sorry.

6 Q. (By Ms. Hamill) Do you receive e-mails from
7 Twitter on your L.A. County Department of Public Health
8 e-mail address?

9 A. I don't --

10 (Stenographer clarification.)

11 THE WITNESS: I do not, no, n-o.

12 MS. HAMILL: All right.

13 I'm having marked as exhibit twenty- --
14 actually, I'm not -- I'm not marking this. This was
15 previously marked as Exhibit 9 to the deposition of
16 Barbara Ferrer.

17 Q. (By Ms. Hamill) When I say --

18 (Stenographer clarification.)

19 Q. (By Ms. Hamill) -- Sootheyness Wednesdays, do
20 you know what I'm referring to?

21 A. I do know what you're referring to.

22 Q. What am I referring to?

23 A. I'm not sure how to describe it, but I believe
24 that's how the LAC+USC doctors refer to their internal
25 town hall, and then it was used by other Twitter

Brett Morrow

1 followers in anticipation for the town hall.

2 **Q. Have you watched those town hall meetings?**

3 A. Not all of them.

4 **Q. How many do you think you've watched?**

5 A. A handful, maybe.

6 **Q. A handful?**

7 A. A handful, maybe; only, like, a minute or two.

8 **Q. Did you have concerns about those town hall**
9 **videos being posted in the comment section under L.A.**
10 **Department of Public Health posts?**

11 A. Not necessarily that they were being posted. I
12 think more so the framing, and what I believe to be the
13 misinterpretation of what was said at times.

14 **Q. So you were concerned about how L.A. County USC**
15 **doctors were framing the pandemic?**

16 A. No, I apologize. The people who were posting
17 the video, adding their own additional context, which I
18 felt as though misinterpreted or misrepresented the
19 frame --

20 **Q. Okay.**

21 A. -- in certain ways.

22 **Q. Okay.**

23 A. Yeah.

24 **Q. So you didn't take issue with the content of**
25 **the video itself.**

Brett Morrow

1 A. I think there were things in there that I -- I
2 would say that our experts didn't agree with. I don't
3 know how I personally -- I can't remember how I
4 personally felt.

5 **Q. So these doctors who hosted the -- or spoke**
6 **during the town halls, they are part of Health Services;**
7 **is that correct?**

8 A. Correct, yes.

9 **Q. And that is another department within the**
10 **County of Los Angeles.**

11 A. Yes.

12 **Q. And does Health Services have their own**
13 **communications director?**

14 A. They do, yes.

15 **Q. And that is not you.**

16 A. Correct.

17 **Q. Who is their communications director?**

18 A. Her name is Coral -- I'm not sure how to
19 pronounce or say her last name. Itzcalli or something
20 along those lines.

21 **Q. Do you know Coral?**

22 A. I've met her several times, yes.

23 **Q. Do you interact frequently in terms of work?**

24 A. Very rarely.

25 **Q. Very rarely.**

Brett Morrow

1 Did you ever talk to Coral or anyone in Health
2 **Services about these town hall videos?**

3 A. I believe I had an exchange with Coral about
4 it, yes.

5 Q. Do you recall the contents of that exchange?

6 A. I believe she told me that they were putting
7 out a clarifying statement.

8 Q. Did you ask her to do that?

9 A. No.

10 Q. So Coral reached out to you to tell you that
11 they were going to put out a clarifying statement?

12 A. If I remember correctly, yes.

13 Q. And there was no prompting from you or your
14 team?

15 A. No. We typically don't tell other departments
16 what to do.

17 Q. So why would Coral reach out to you to tell you
18 that?

19 MR. RAYGOR: Calls for speculation.

20 THE WITNESS: I don't know.

21 Q. **(By Ms. Hamill) You have no idea why?**

22 MR. RAYGOR: Asked and answered.

23 THE WITNESS: We both work for the County,
24 so -- and I think -- I can't explain further.

25 Q. **(By Ms. Hamill) So looking at this document**

Brett Morrow

1 that was marked as Exhibit 9 to the deposition of
2 Barbara Ferrer, was there anything in this thread that
3 concerned you in your capacity as the Chief
4 Communications Officer for the department?

5 A. I can't really read all of it. I think the
6 tweet at the bottom, from "pavement" -- I can't read the
7 numbers -- I think that that's misinterpreting the video
8 and adding additional context on top of what was said,
9 and I can't -- I can't make out the words on this other
10 one; all of them, at least.

11 Q. So the "pavement" tweet says, "I encourage
12 anyone who believes there is a COVID emergency in L.A.
13 to watch today's L.A. County USC press conference. Read
14 through this thread too."

15 So that was concerning to you.

16 A. Correct, yes.

17 Q. Did you want that tweet to be removed?

18 A. I don't remember. I don't remember.

19 Q. Did you report that tweet for misinformation?

20 A. I don't remember.

21 Q. And the tweet above -- I agree; I can't read
22 what it says, but there is a -- an image shared that
23 says, "Snowflake weepies pay Sheila's big salary.
24 Nepotism equals three years of masks."

25 Did this particular tweet concern you?

Brett Morrow

1 A. I don't remember. I don't remember necessarily
2 seeing the tweet at the time. I can't remember if it
3 concerned me at the time.

4 **Q. In your capacity as the Chief Communications**
5 **Officer, did you attempt to manage Dr. Ferrer's**
6 **reputation by getting tweets about nepotism removed?**

7 A. I don't believe so.

8 **Q. Were you concerned about her reputation?**

9 A. As our leader, I feel as though her reputation
10 is important in order for her to provide accurate
11 information to the residents, and so I feel as though
12 her credibility is important, yes.

13 **Q. Did you do anything to try and protect her**
14 **credibility or reputation?**

15 A. Not that I really remember.

16 **Q. I'm showing you what was previously marked as**
17 **Exhibit 10 to the deposition of Barbara Ferrer.**

18 (Stenographer clarification.)

19 **Q. (By Ms. Hamill) Do you recall seeing this**
20 **exchange? And I'll let you thumb through.**

21 A. Sorry. I didn't see the second page. I don't
22 recall seeing it, but --

23 (Stenographer clarification.)

24 THE WITNESS: I don't recall seeing it at the
25 time, but I'm certain it happened.

Brett Morrow

1 Q. (By Ms. Hamill) Did you report any of these
2 tweets from "Nikki will not comply" or from "storm"?

3 A. I don't believe so.

4 Q. Did you ever contact Dr. Spellberg or
5 Dr. Holtom at L.A. County USC?

6 A. Never.

7 Q. Never.

8 MS. HAMILL: I'm going to share what's been
9 marked as Exhibit 11 in the deposition of Barbara
10 Ferrer. It doesn't need to be marked.

11 Q. (By Ms. Hamill) And is this the letter that
12 you were referring to earlier that went out from Health
13 Services?

14 MR. RAYGOR: Objection. Lacks foundation that
15 it's a letter.

16 THE WITNESS: It appears so, yes.

17 Q. (By Ms. Hamill) Would you call this a letter?
18 Or if not, what would you call it?

19 A. I think it's -- it says it's a statement.

20 Q. A statement. A statement. And so this is the
21 statement that Coral was talking about when she reached
22 out to you?

23 A. She sent it to me.

24 Q. Oh, she sent it to you?

25 A. Correct, yes.

Brett Morrow

1 Q. Did she ask you for comment?

2 A. No.

3 Q. Did she ask you for any revisions or edits?

4 A. Not that I remember.

5 Q. What did you say in response?

6 MR. RAYGOR: Lacks foundation.

7 THE WITNESS: I don't think I responded, to be
8 honest. Maybe -- I probably said, "Thank you."

9 Q. (By Ms. Hamill) Do you know what prompted
10 Health Services to issue this statement?

11 A. I don't know.

12 Q. And you were not involved in drafting this
13 statement.

14 A. Not at all.

15 Q. No one from your team?

16 A. Nope.

17 Q. I'm going to show you what was already marked
18 as Exhibit 12 to the deposition of Barbara Ferrer. We
19 do not need to mark this.

20 Do you recall this exchange?

21 A. I don't, no.

22 Q. Do you recall seeing a tweet from Dr. Spellberg
23 saying: "It's the definition of COVID death. If you
24 die with a COVID-positive test, that's reported as a
25 COVID death. Since we test all admissions for COVID,

1 symptoms or not, over 90 percent of positive tests are
2 now incidental findings, not COVID dz, meaning most
3 COVID-positive deaths are not due to COVID."

4 Do you remember seeing that statement floating
5 around?

6 A. I don't.

7 Q. Is this an example of misinformation, in your
8 opinion?

9 MR. RAYGOR: Objection. Incomplete
10 hypothetical.

11 THE WITNESS: I don't really know how -- I'm
12 not a Public Health expert or a doctor, so I can't
13 really speak to the specifics about LAC+USC's testing
14 protocols or how they're reported as COVID deaths. I
15 don't want to guess.

16 Q. (By Ms. Hamill) Is this an example of the
17 allegation that COVID tests were being overinflated by
18 the County?

19 A. It seems to be more about --
20 (Stenographer clarification.)

21 THE WITNESS: -- deaths than tests, so I would
22 say no.

23 Q. (By Ms. Hamill) So would this be an example of
24 someone accusing the County of overinflating the death
25 count?

Brett Morrow

1 A. I don't think so. It doesn't look as though
2 he's referring to the County or anyone in particular or
3 making any kind of accusation.

4 **Q. Do you know who Dr. Spellberg is?**

5 A. I do now, yes.

6 **Q. Who is he?**

7 A. Chief -- he works at LAC+USC. I can't remember
8 his specific title.

9 **Q. Are you aware that he deleted that tweet?**

10 A. I am not, no.

11 **Q. You didn't ask him to delete the tweet.**

12 A. No.

13 **Q. Have you ever had any exchanges with
14 Dr. Spellberg?**

15 A. Never.

16 **Q. Have you ever talked to Coral about
17 Dr. Spellberg's tweets?**

18 A. I believe there was once, yes.

19 **Q. What was that exchange about?**

20 A. I believe he liked a tweet that was,
21 ironically, critical of him, and I wasn't sure what that
22 meant.

23 **Q. And you talked to Coral about it?**

24 A. I think I flagged it for her.

25 **Q. What does that mean?**

Brett Morrow

1 A. I just sent it -- sent it to her.

2 Q. Did you say anything to her about that when you
3 sent it to her?

4 A. I don't think so, no.

5 Q. Did you send it to her via e-mail?

6 A. I believe so, yes, if I -- if I'm remembering
7 correctly, I think I said something like, "I'm not sure
8 if he meant to like this."

9 Q. Okay.

10 A. This tweet that was, if I remember correctly,
11 negative about him.

12 Q. Was it a screenshot or a link that you sent?

13 A. I can't remember.

14 Q. Did she respond?

15 A. I don't remember.

16 Q. Are you aware of Coral monitoring
17 Dr. Spellberg's tweets?

18 A. I'm not aware.

19 Q. Were you monitoring Dr. Spellberg's tweets?

20 A. I was not, no.

21 Q. How did you see that particular tweet that you
22 flagged for Coral?

23 A. I don't remember. I don't remember.

24 Q. Do you recall Dr. Spellberg agreeing to an
25 interview with a local news station around the time of

1 this particular tweet that is identified on Exhibit 12?

2 A. Can you repeat the question again.

3 Q. Do you recall Dr. Spellberg agreeing to an
4 interview with a local news station around the time that
5 he tweeted this tweet that is on Exhibit 12?

6 A. I was not aware at the time that he had agreed
7 to do an interview with a local news station.

8 Q. So you had nothing to do with the cancellation
9 of the interview with Dr. Spellberg?

10 A. No.

11 MR. RAYGOR: Objection. Lacks foundation.

12 THE WITNESS: No. I was told by a reporter
13 after the fact.

14 Q. (By Ms. Hamill) You were told by a reporter
15 after the fact?

16 A. Yes.

17 Q. Who told you?

18 A. Marla Tellez.

19 Q. Marla Tellez told you that -- what happened?

20 A. That he had canceled his interview.

21 Q. Dr. Spellberg canceled his interview?

22 A. Correct, yes.

23 Q. But you had nothing to do with it.

24 MR. RAYGOR: Asked and answered.

25 THE WITNESS: No, none whatsoever.

Brett Morrow

1 **Q. (By Ms. Hamill) Why would Marla Tellez tell**
2 **you that?**

3 MR. RAYGOR: Calls for speculation.

4 THE WITNESS: I can't remember the context. We
5 were at a press conference and chatting after the fact.

6 **Q. (By Ms. Hamill) Do you have any idea who**
7 **convinced Dr. Spellberg to cancel the interview?**

8 A. None.

9 **Q. Did you ever review content about COVID before**
10 **it was aired by local news stations?**

11 A. I don't think so ever, no. I'm almost certain,
12 no, I never did.

13 **Q. Have you ever taken a look at the County's**
14 **Facebook page review section?**

15 A. I have, yes.

16 **Q. And do you have any opinions or thoughts about**
17 **what is in that review section?**

18 A. I think it was -- I only recently got made
19 aware that there is a review section. I don't use
20 Facebook a lot, but if I remember correctly, there are
21 businesses posting their -- promoting their business and
22 other things. I don't remember specifics.

23 **Q. Have you ever reported any of the reviews?**

24 A. No.

25 **Q. Have you ever considered closing the review**

Brett Morrow

1 section?

2 A. No. I'm not sure if that's possible or how to
3 do that.

4 Q. Who manages the Facebook account for L.A.
5 County Department of Public Health?

6 A. The Communications team.

7 Q. Your team?

8 A. Correct, yes.

9 Q. So are --

10 A. I apologize.

11 Q. Are public comments closed on Facebook?

12 A. Yes.

13 MS. HAMILL: Okay.

14 I'm going to mark as Exhibit --

15 THE WITNESS: Can I clarify one thing? I
16 apologize.

17 Q. (By Ms. Hamill) Yes. Yes.

18 A. You can't just automatically close public
19 comments as you're posting. If I'm understanding
20 correctly, you have to manually close public commentary
21 as you're posting.

22 Q. For each post?

23 A. Correct, yes.

24 Q. On Facebook.

25 A. That's my understanding, correct, yes.

Brett Morrow

1 Q. Is it the same for Twitter?

2 A. I believe so, but I think Twitter kind of
3 auto-populates it. It may remember that this is the
4 setting, as well. And I think similar for Instagram;
5 you have to do it manually for each post too.

6 Q. So Facebook and Instagram require a little
7 extra effort.

8 A. Correct, yes.

9 MS. HAMILL: Okay.

10 I believe we're at 21; is that correct? Okay.

11 I'm going to have marked as Exhibit 21 a
12 Facebook post from L.A. County Department of Public
13 Health dated August 23rd, 2022.

14 (Exhibit 21 marked for identification.)

15 Q. (By Ms. Hamill) Have you seen this before?

16 A. I'm sure I have, yes.

17 Q. And it looks like there are 41 comments below
18 this post; is that correct?

19 A. It says there are 41 comments, yes.

20 Q. Why were the comments left open on this
21 particular post?

22 A. I'm sure it was a mistake by whoever posted it.
23 Or there are some functions between Instagram and
24 Facebook where you can cross-post, add content at the
25 same time, and I think, at times, there were issues with

Brett Morrow

1 turning off the comments or not crossing over to
2 Facebook if you were cross-posting it on Instagram, and
3 I think we discovered that later.

4 MS. HAMILL: I'm going to have marked as
5 Exhibit 22 a post from Los Angeles County Department of
6 Public Health on Facebook dated August 30th, 2022.

7 (Exhibit 22 marked for identification.)

8 **Q. (By Ms. Hamill) Do you recognize this as being**
9 **a Facebook post from the L.A. County Department of**
10 **Public Health?**

11 A. Yes.

12 **Q. And are the comments open on this post?**

13 A. They appear to be, yes.

14 **Q. And why are the comments open on this post?**

15 A. I'm assuming because somebody forgot to turn
16 them off, or it was a similar situation with
17 cross-posting settings.

18 MS. HAMILL: I'm going to mark as Exhibit 23 a
19 Facebook post from Los Angeles County Department of
20 Public Health dated September 1st, 2022.

21 (Exhibit 23 marked for identification.)

22 **Q. (By Ms. Hamill) Do you recognize this as being**
23 **a Facebook post from the L.A. County Department of**
24 **Public Health?**

25 A. I do, yes.

Brett Morrow

1 Q. And are the comments open on this post?

2 A. They are.

3 Q. And would it be for the same reasons that you
4 mentioned before?

5 A. I assume so, yes.

6 Q. So it was a mistake or a cross-posting error?

7 A. Exactly, yes.

8 MS. HAMILL: I'm going to mark as Exhibit 24 a
9 Facebook post from the L.A. County Department of Public
10 Health.

11 (Exhibit 24 marked for identification.)

12 Q. (By Ms. Hamill) And this one is dated October
13 10th, 2022.

14 Do you recognize this as being a Facebook post
15 from the Los Angeles County Department of Public Health?

16 A. I do.

17 Q. And are the comments open on this post?

18 A. They are.

19 Q. And do you know why the comments are open on
20 this particular post?

21 A. I assume it's the same reasons.

22 MS. HAMILL: I'm going to mark as Exhibit 25 a
23 Facebook post from L.A. County Department of Public
24 Health dated October 13th, 2022.

25 (Exhibit 25 marked for identification.)

Brett Morrow

1 Q. (By Ms. Hamill) Do you recognize this as being
2 a Facebook post from the L.A. County Department of
3 Public Health?

4 A. I do.

5 Q. And are the comments open on this post?

6 A. It appears so.

7 Q. And why are these comments open?

8 A. I assume for the same reason.

9 MS. HAMILL: I'm going to mark as Exhibit 26 a
10 Facebook post from the L.A. County Department of Public
11 Health dated October 14th, 2022.

12 (Exhibit 26 marked for identification.)

13 Q. (By Ms. Hamill) Do you recognize this as being
14 a Facebook post from the L.A. County Department of
15 Public Health?

16 A. I do.

17 Q. And are the comments open on this post?

18 A. They are.

19 Q. For the same reasons as you mentioned before?

20 A. I'm sure.

21 MS. HAMILL: Only a few more here.

22 I'm having marked as Exhibit 27 a post -- a
23 Facebook post from the L.A. County Department of Public
24 Health dated October 19th, 2022.

25 (Exhibit 27 marked for identification.)

Brett Morrow

1 Q. (By Ms. Hamill) Do you recognize this as being
2 a Facebook post from the L.A. County Department of
3 Public Health?

4 A. I do.

5 Q. And are the comments open on this post?

6 A. They are.

7 Q. And are they open for the same reasons that you
8 mentioned before?

9 A. I assume so.

10 MS. HAMILL: I'm marking as Exhibit 28 a
11 Facebook post from the Los Angeles County Department of
12 Public Health.

13 (Exhibit 28 marked for identification.)

14 Q. (By Ms. Hamill) And this one doesn't appear to
15 have a date, because it looks like it was probably
16 posted in the original language.

17 Do you happen to know what language this is?

18 A. It appears to be Korean.

19 Q. And do you recognize this as being a Facebook
20 post from the L.A. County Department of Public Health?

21 A. I do, yes.

22 Q. And it looks -- based on the dates of the
23 comments, it looks to be about 34 weeks ago; is that
24 correct?

25 A. From when the comments are posted, yes.

Brett Morrow

1 Q. And do you know why the comments were left open
2 on this post?

3 A. I assume similar reasons.

4 MS. HAMILL: I'm having marked as Exhibit 29 a
5 Facebook post from the L.A. County Department of Public
6 Health dated October 28th, 2022.

7 (Exhibit 29 marked for identification.)

8 Q. (By Ms. Hamill) Do you recognize this as being
9 a Facebook post from the L.A. County Department of
10 Public Health?

11 A. I do, yes.

12 Q. And the comments are open on this post as well;
13 correct?

14 A. Yes.

15 Q. And do you know why the comments were left
16 open?

17 A. I assume the same reasons.

18 MS. HAMILL: I'm having marked as Exhibit No.
19 30 a screenshot from the L.A. County Department of
20 Public Health Facebook page, the review section.

21 (Exhibit 30 marked for identification.)

22 Q. (By Ms. Hamill) Do you recognize this as being
23 the Facebook page of the L.A. County Department of
24 Public Health?

25 A. I do, yes.

Brett Morrow

1 Q. And this is the top of the review section;
2 correct?

3 A. It appears so, yes.

4 Q. And the review depicted here is from Charles
5 Bird recommending the L.A. County Department of Public
6 Health -- talking about investing his last dollar with a
7 person named Mr. Donald Brian, "who proved to be the
8 most honest and trustworthy expert trader. He has been
9 helping me with my trading for a long time now and my
10 experience has been so amazing earning \$14,000 every two
11 weeks from my little start-up capital of \$600." Emogi,
12 emogi, emogi.

13 Have you seen this before?

14 A. I don't recall seeing this before. I may have
15 at one point.

16 Q. And so you personally have not gone through the
17 reviews to report them; is that correct?

18 A. To report them, no.

19 Q. But you've reviewed them?

20 A. Maybe scrolled through them quickly.

21 MS. HAMILL: Last exhibit here. I'm going to
22 have marked as Exhibit 31 reviews from the L.A. County
23 Department of Public Health Facebook page.

24 (Exhibit 31 marked for identification.)

25 Q. (By Ms. Hamill) Do you recognize this as being

Brett Morrow

1 a screenshot from the review section of the Facebook
2 page of the L.A. County Department of Public Health?

3 A. It appears so, yes.

4 Q. And the first review here from Tiffany Irving
5 is talking about an herbal doctor who cured HSV and then
6 Lebong -- Lebo -- Lebogang. I'm sorry. I cannot
7 pronounce the second tweet name -- or the second review
8 name. This one talks about herpes cures and herbal cure
9 for herpes. And then the third one is from Salvador
10 Fraias talking about herpes herbal cures again.

11 Have you seen these reviews?

12 A. I may have in quickly scrolling through them.

13 Q. But you haven't reported these to Facebook.

14 A. No.

15 Q. Do you think that it's harmful to L.A. County
16 Department of Public Health to have these reviews
17 publicly posted on its Facebook page?

18 A. I don't -- I'm not sure. I don't think --
19 there's not a lot of traffic to this page. I don't
20 think it's beneficial, but I also don't think it's a
21 crisis or an emergency as well.

22 Q. If people want to get herbal herpes cures, they
23 know where to look.

24 MR. RAYGOR: Objection. Calls for speculation.
25 Not a question.

Brett Morrow

1 Q. (By Ms. Hamill) Do you know how many reviews
2 are posted on the County Department of Public Health's
3 Facebook page?

4 A. I do not.

5 Q. According to Exhibit 30, it looks like there
6 are 172 reviews. Does that seem correct to you?

7 A. I have no idea how many there are.

8 MS. HAMILL: Let's take a quick
9 five-to-ten-minute break, and I'm going to wrap up.

10 THE WITNESS: Okay.

11 THE VIDEOGRAPHER: We're off the record. The
12 time is 2:48 p.m. Pacific Time.

13 (Recess taken from 2:48 p.m. to 3:06 p.m.)

14 THE VIDEOGRAPHER: We're back on the record.
15 The time is 3:06 p.m. Pacific Time.

16 Q. (By Ms. Hamill) So I just have a few follow-up
17 questions, and I'm going to jump around, so if you need
18 any clarification, feel free to ask.

19 So going back to your Instagram account and
20 your wife's Instagram account, do you know when those
21 accounts were made private?

22 A. I don't remember, no.

23 Q. And then going back to the issue of
24 Dr. Spellberg at L.A. County USC, are you aware of
25 anyone else at L.A. County Department of Public Health

Brett Morrow

1 contacting Spellberg or contacting Coral?

2 A. I'm not, no.

3 Q. Were you aware of anyone else of the L.A.
4 County Department of Public Health being concerned about
5 Dr. Spellberg's comments?

6 A. I'm not.

7 Q. Do you handle internal department
8 communications?

9 A. Parts of it, yes.

10 Q. What parts?

11 A. Sometimes, there are e-mails sent out to all
12 staff that I may be involved in, fliers for internal
13 events or staff meetings.

14 Q. Were you aware of an internal e-mail that was
15 sent by Liza or Lisa Frias? Do you know who that is?

16 A. I know who Lisa Frias is.

17 Q. Lisa Frias.

18 A. Lisa Frias.

19 Q. Okay.

20 Were you aware of an internal e-mail that she
21 sent out in July of 2022 to the -- she was asking for
22 volunteers to work overtime in anticipation of
23 reinstatement of the mask mandate Friday, July 29th.
24 Were you involved in the composition of that e-mail?

25 A. I was not, no.

Brett Morrow

1 Q. Did you receive that e-mail?

2 A. I did not.

3 Q. And she's the director of environmental health?

4 A. Correct.

5 Q. Is that a subdepartment of the L.A. County
6 Department of Public Health?

7 A. It is a program within our Health Protection
8 Bureau.

9 Q. Health Protection Bureau?

10 A. Correct.

11 Q. What is the Health Protection Bureau?

12 A. It involves several programs; one being
13 Environmental Health; another being Emergency
14 Preparedness Response Division; and another one, I
15 believe, Health Facilities Inspection Division.

16 Q. And was that department involved in COVID
17 response?

18 A. I would say the entire department was involved
19 in COVID response in some capacities. I can't say if
20 every employee was, but multiple programs were involved
21 in it in some capacity.

22 Q. And does Environmental Health have its own
23 communications team, or do you handle communications for
24 them as well?

25 A. At times, they had their own communications

Brett Morrow

1 support internally within Environmental Health, yes.

2 Q. Would you oversee that team?

3 A. No, not necessarily.

4 Q. Do you recall who was part of that team?

5 A. Carl Kemp.

6 Q. Carl Kemp?

7 A. Correct.

8 Q. Do you recall the length of time that Carl Kemp
9 served as their communications person?

10 A. I think he was reassigned around June 2020 to
11 Environmental Health, and I believe he left sometime
12 late last year.

13 Q. Is he in prison?

14 A. Is he in prison?

15 Q. Yes.

16 A. I don't know if he's in prison.

17 Q. Was he in prison?

18 A. I believe he -- I believe he was, yes.

19 Q. Can you think of any specific examples of
20 threats that you described in your e-mails to Twitter?

21 A. I can't remember if I was thinking of specific
22 threats at that time, but I do remember social media
23 threats saying that Dr. Ferrer should be shot.

24 Q. That was on Twitter?

25 A. I believe that was Facebook.

Brett Morrow

1 Q. Facebook?

2 A. Correct.

3 Q. Was that reported to law enforcement?

4 A. I believe so. I wasn't involved at the time,
5 though -- in the reporting of that at the time, though.

6 Q. Do you recall who was involved?

7 A. I don't.

8 Q. And I assume that posting was removed?

9 A. I don't know.

10 Q. Did you speak with or coordinate any
11 communication strategy with any other governmental
12 agency?

13 A. We would discuss what other departments were
14 doing primarily to make sure we weren't double-backing
15 or stepping on each other's toes or doing the same
16 thing, so we weren't wasting resources or oversaturating
17 specific messages but, I -- sorry.

18 Q. Go ahead.

19 A. But I wouldn't say it was incredibly organized,
20 and sometimes I would ask advice from other departments
21 as well.

22 Q. What departments are you referring to?

23 A. California Department of Public Health.

24 Q. Who's their communications person?

25 A. It's changed several times. Right now, I

Brett Morrow

1 believe it is a gentleman named Brian Mycek? "Meecek"?
2 I'm not sure how to pronounce the name.

3 **Q. Is your contact with the California Department**
4 **of Public Health the communications side, or who are**
5 **your contacts at the California Department of Public**
6 **Health?**

7 A. I'm not sure if he was on the communications
8 side or if he was in charge of the COVID response, but
9 he was my point of contact.

10 **Q. Brian?**

11 A. Yes.

12 **Q. Any other agencies aside from the California**
13 **Department of Public Health that you coordinated with?**

14 A. Other county departments as well.

15 **Q. Throughout the state?**

16 A. I'm sorry. Throughout Los Angeles County.

17 **Q. Oh.**

18 A. Not other counties throughout the state.

19 **Q. Which other departments?**

20 A. Primarily the county-wide communications.
21 (Stenographer clarification.)

22 **Q. (By Ms. Hamill) And who is in charge of**
23 **county-wide communications?**

24 A. Lennie LaGuire.

25 **Q. Have you had any contact with any intelligence**

Brett Morrow

1 agencies or law enforcement agencies at the federal
2 level?

3 MR. RAYGOR: Vague -- sorry. Vague and
4 ambiguous and not limited to the scope, and vague --
5 vague as to time.

6 THE WITNESS: What kind --
7 (Stenographer clarification.)

8 THE WITNESS: What kind of agencies are you
9 referring to?

10 Q. (By Ms. Hamill) Intelligence agencies or law
11 enforcement agencies at the federal level; so FBI, for
12 example.

13 A. No, never.

14 Q. No. Any other federal agencies?

15 A. When the CDC director was here visiting, I did
16 some coordination with her communications team for
17 events, and there was -- I don't know what department it
18 was, but it was -- there was some -- something involved
19 with the COVID response. They were -- I want to say
20 maybe it was involving military. They were setting up a
21 vaccination site, I want to say, maybe in Pomona, and I
22 had, maybe, a call or two with the point of contact
23 there, but it was just logistical coordination.

24 And I'm sorry. I can't remember the name of
25 the department.

Brett Morrow

1 Q. Did you ever reach out to Meta, which is the
2 parent company for Facebook and Instagram, to ask for
3 removal of accounts or removal of any posts?

4 A. I have previously, yes.

5 Q. You have. How did you reach out to them?

6 A. There is a point of contact for Meta that -- I
7 don't know if they're assigned to us, but they respond
8 to regional government departments, and they're our
9 point of contact.

10 Q. Who is your point of contact there?

11 A. I believe it is Zack Gregory.

12 Q. And do you communicate with Zack Gregory via
13 e-mail?

14 A. I really don't communicate with him, but when I
15 did, it was via e-mail, yes.

16 Q. When did you communicate with him?

17 A. Specifically on the removal of posts?

18 Q. Um-hum.

19 A. Years ago. I can't remember.

20 Q. 2020?

21 A. Maybe 2020, maybe 2021.

22 Q. And when you would contact Mr. Gregory about
23 removing posts and removing accounts, would he generally
24 do as you asked?

25 MR. RAYGOR: Objection. Lacks foundation about

Brett Morrow

1 removing of accounts.

2 THE WITNESS: I was just asking them to review
3 if it violated their policies. I don't remember it
4 being necessarily "remove content" every single time.

5 Q. (By Ms. Hamill) Do you recall them ever
6 removing content at your request?

7 A. I do, yes.

8 Q. Do you recall what that content was?

9 A. Yes.

10 Q. What was it?

11 A. It was the personal address of a DPH employee.
12 It was -- they were being --

13 (Stenographer clarification.)

14 THE WITNESS: -- doxxed, d-o-x-x-e-d.

15 Q. (By Ms. Hamill) Was there anything else that
16 you recall being removed at your request?

17 A. No. That was the only thing I ever contacted
18 Meta about.

19 Q. In your capacity as an employee or as a
20 contractor with the County of Los Angeles, have you ever
21 had any communications with any labor unions?

22 A. No. Maybe once. Rarely. Not -- maybe once.

23 Q. Maybe once with who?

24 A. I can't remember the specific name, but we did
25 a media briefing or a press conference with a doctor who

Brett Morrow

1 was a member of a union.

2 **Q. A physician?**

3 A. A physician, yes, correct. I believe he was an
4 emergency room physician.

5 **Q. Have you ever been in contact with anyone from**
6 **UTLA, which is United Teachers Los Angeles?**

7 A. Never.

8 **Q. And do you wear a mask at all times?**

9 A. Not at all times.

10 **Q. When do you wear a mask?**

11 A. Depending on where I'm going. If I'm indoors;
12 if I'm with people I don't necessarily know personally
13 as well, depending on certain situations.

14 MS. HAMILL: Okay.

15 I have no further questions, and I am prepared
16 to wrap this up. I don't have any preference on a
17 stipulation. Do you?

18 MR. RAYGOR: So I don't have to drag you to the
19 Aptus office, can we get the --

20 (Stenographer clarification.)

21 MR. RAYGOR: Do you mind stipulating that the
22 transcript will be sent to the witness for correction,
23 and he'll have 30 days from receipt in which to make any
24 changes or corrections that he --

25 MS. HAMILL: That's fine with me.

Brett Morrow

1 THE STENOGRAPHER: Counsel, before we go off
2 the record, would you like to order a copy of today's
3 transcript?

4 MR. RAYGOR: I would, and the video too.

5 THE VIDEOGRAPHER: Synced with the transcript?

6 MR. RAYGOR: Yes, please.

7 THE STENOGRAPHER: Thank you.

8 And, Counsel, one last thing. Per Code, the
9 30-day read and sign letter is to be sent to the
10 deponent. Should the letter be sent directly to your
11 client, or would you request the 30-day letter be sent
12 to your client through you at your office?

13 MR. RAYGOR: Can you send the transcript and
14 the letter to me, and then I'll make sure he gets it --
15 he, the witness.

16 Is that okay with you?

17 MS. HAMILL: Yes.

18 THE VIDEOGRAPHER: Can we go off the record?

19 MS. HAMILL: Yes.

20 MR. RAYGOR: Yes.

21 THE VIDEOGRAPHER: Here concludes the video
22 deposition of Brett Morrow, and we're off the record at
23 3:20 p.m. Pacific Time.

24 (Whereupon, the deposition of BRETT MORROW
25 concluded at 3:20 p.m.)

Brett Morrow

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::: CERTIFICATE OF REPORTER :::

I, HEATHER J. BAUTISTA, a Certified Shorthand Reporter, holding a valid and current license issued by the State of California, CSR No. 11600, duly authorized to administer oaths, do hereby certify:

That the witness in the foregoing deposition was administered an oath to testify to the whole truth in the within-entitled cause.

That said deposition was taken down by me in stenographic shorthand to the best of my ability at the time and place therein stated and thereafter transcribed into typewriting, by computer, under my direction and supervision.

Should the signature of the witness not be affixed to the deposition, the witness shall not have availed himself/herself of the opportunity to sign or the signature has been waived.

I further certify that I am neither counsel for, nor related to, any party in the foregoing deposition and caption named, nor in any way interested in the outcome thereof.

Dated: July 18, 2023

HEATHER J. BAUTISTA, CSR, CRR, RPR, CLR
California Certified Shorthand Reporter License #11600
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Nevada Certified Court Reporter License #980
Texas Certified Shorthand Reporter License #10725
Certified Realtime Reporter 852251
Registered Professional Reporter
Certified LiveNote Reporter
Realtime Systems Administrator

Brett Morrow

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DECLARATION UNDER PENALTY OF PERJURY

Case Name: Alliance of LA County Parents vs.
County of LA Dept. of Public Health
Date of Deposition: 07/07/2023

Job No.: 10123094

I, BRETT MORROW, hereby certify
under penalty of perjury under the laws of the State of
_____ that the foregoing is true and correct.

Executed this _____ day of
_____, 2023, at _____.

BRETT MORROW

NOTARIZATION (If Required)

State of _____
County of _____

Subscribed and sworn to (or affirmed) before me on
this _____ day of _____, 20__,
by _____, proved to me on the
basis of satisfactory evidence to be the person
who appeared before me.

Signature: _____ (Seal)

Brett Morrow

1 DEPOSITION ERRATA SHEET

2 Case Name: Alliance of LA County Parents vs.
County of LA Dept. of Public Health

3 Name of Witness: Brett Morrow
Date of Deposition: 07/07/2023
Job No.: 10123094

4 Reason Codes: 1. To clarify the record.
2. To conform to the facts.
3. To correct transcription errors.

5

6 Page _____ Line _____ Reason _____

7 From _____ to _____

8 Page _____ Line _____ Reason _____

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10 Page _____ Line _____ Reason _____

11 From _____ to _____

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13 From _____ to _____

14 Page _____ Line _____ Reason _____

15 From _____ to _____

16 Page _____ Line _____ Reason _____

17 From _____ to _____

18 Page _____ Line _____ Reason _____

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20 Page _____ Line _____ Reason _____

21 From _____ to _____

22 Page _____ Line _____ Reason _____

23 From _____ to _____

24 Page _____ Line _____ Reason _____

25 From _____ to _____

Brett Morrow

1 DEPOSITION ERRATA SHEET

2 Page _____ Line _____ Reason _____

3 From _____ to _____

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5 From _____ to _____

6 Page _____ Line _____ Reason _____

7 From _____ to _____

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12 Page _____ Line _____ Reason _____

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14 Page _____ Line _____ Reason _____

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17 From _____ to _____

18 Page _____ Line _____ Reason _____

19 From _____ to _____

20 Page _____ Line _____ Reason _____

21 From _____ to _____

22 _____ Subject to the above changes, I certify that the
transcript is true and correct

23 _____ No changes have been made. I certify that the
transcript is true and correct.

24

25

BRETT MORROW

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