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6 SELECT COMMITTEE TO INVESTIGATE THE
7 JANUARY 6TH ATTACK ON THE U.S. CAPITOL,
8 U.S. HOUSE OF REPRESENTATIVES,
9 WASHINGTON, D.C.

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13 DEPOSITION OF: DUSTIN STOCKTON

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Tuesday, December 14, 2021

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Washington, D.C.

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The deposition in the above matter was held in Room 5480, O'Neill House Office
23 Building, commencing at 10:07 a.m.

1 Appearances:

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5 For the SELECT COMMITTEE TO INVESTIGATE

6 THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

7

8 [REDACTED] INVESTIGATIVE COUNSEL

9 [REDACTED] INVESTIGATIVE COUNSEL

10 [REDACTED], CHIEF CLERK

11 [REDACTED] RESEARCHER

12 [REDACTED], STAFF ASSOCIATE

13 [REDACTED] CHIEF ADMINISTRATIVE OFFICER

14

15

16 For THE WITNESS:

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18 JOSHUA NASS

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3 [REDACTED] Today is December 14, 2021. We are here for the deposition of
4 Dustin Stockton by the House Select Committee to Investigate the January 6th Attack on
5 the United States Capitol. My name is [REDACTED] and I'm an investigative counsel
6 designated by the select committee to conduct this deposition. Also with me is
7 [REDACTED] investigative counsel, and [REDACTED], researcher for the select
8 committee.

9 We may be joined by members of the committee at various points during the
10 deposition, and I will attempt to stop and acknowledge them when they join us for the
11 record. Under House rules, members are authorized to ask questions at any point
12 during the deposition.

13 Under deposition rules in the House, neither committee members nor staff may
14 discuss the substance of your testimony today unless the committee approves the release
15 of that testimony. You and your attorney, Mr. Stockton, will have the opportunity to
16 review the transcript.

17 At this time, I'd ask that your counsel identify himself for the record.

18 Mr. Nass. Joshua Nass.

19 [REDACTED] Thank you, Mr. Nass.

20 I'd note that under House rules, Mr. Stockton, you may have your attorney
21 present, but counsel for other individuals may not be, and therefore, as you can see, are
22 not present and the same goes for attorneys from other government agencies.

23 Before we get started, I'd like to just cover a few ground rules for the deposition
24 today. First, as you can see, we have an official reporter transcribing our conversation.
25 For that reason, I'd ask that you wait until I ask the question, and I will wait until you

1 answer before I ask another question so that we're not overlapping each other.

2 Relatedly, nonverbal responses can't be noted for the record, so if the response is a yes or
3 no, something along those lines, we'd ask that you do that as opposed to nodding or
4 shaking your head.

5 For today's deposition, we'd ask that you give complete answers to the best of
6 your recollection. If you don't know an answer, just say so. If you need clarification,
7 just say so. And, finally, if you need to take a break for any reason or to speak with your
8 attorney, just say so.

9 I should note that you may not refuse to answer a question unless that refusal is
10 preserve -- is to preserve a privilege that is recognized by the select committee. If you
11 refuse to answer a question that is based on one of those privileges, the process is that
12 we can either move on and come back to it later, or we can seek a ruling from the
13 chairman of the committee on that objection. If the chairman overrules the objection,
14 you'd be required to answer.

15 And, finally, I must remind you as we do to all witnesses, that it is unlawful to
16 provide false or materially misleading testimony to Congress. Doing so could result in
17 criminal penalties under 18 United States Code section 1001.

18 Mr. Stockton, do you understand everything I have said so far?

19 The Witness. Yes, sir.

20 [REDACTED] All right. I would ask that the witness be sworn in.

21 Court Reporter. Do you solemnly declare and affirm under penalty of perjury
22 that the testimony you shall give will be the truth, the whole truth, and nothing but the
23 truth?

24 The Witness. I do, so help me God.

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EXAMINATION

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[REDACTED]

Q Before we begin, I'd also note for the record that there are some binders with exhibits that have been previously marked. They're marked for organization and identification purposes. We may go out of order, but I'll do my best to note through the record which exhibits we're looking at, and the binders were here this morning based on documents previously provided by Mr. Stockton.

First, Mr. Stockton, could you just state your full name for the record.

A Dustin Alan Stockton.

Q And if you could look at Exhibit 1, which is behind tab one. This is the subpoena issued by the Select Committee to Investigate the January 6th Attack on the United States Capitol on November 22nd. Are you the Dustin Stockton that's named in this subpoena?

A I am.

Q All right. I'd like to start by, if you flip to tab two, this is a printout of a Rolling Stone article that was published on or about October 25, 2021. And the title is, quote, "Exclusive: Jan. 6 Protest Organizers Say They Participated in 'Dozens' of Planning Meetings With Members of Congress and White House Staff," closed quote. It's not reflected from the face of the exhibit, but the public record reflects this article was written by a journalist named Hunter Walker.

Mr. Stockton, you were a source for this article. Is that right?

A Yes.

Q And the article describes two planners who previously were anonymous, who provided information. Were you one of those anonymous sources?

A Yes, I was.

Q Okay. And, in fact, I believe there was an article published last night that

1 identifies you as one of those anonymous sources, correct?

2 A Yes, that is correct.

3 Q So I'd like to talk a little bit about some of the information that's provided by
4 the sources in this article to get us started. The article provides information about
5 communications with Members of Congress. Did you communicate with Members of
6 Congress between Election Day, 2020, and January 6, 2021?

7 A Yes, I did.

8 Q Who did you communicate with?

9 A Specifically, there were many members as a result of the three different
10 rallies that we did in D.C., November, December, and January, and then also, traveling
11 around the country. Those members in the House include Madison Cawthorn, Lauren
12 Boebert, Paul Gosar, Good from Virginia, Marjorie Taylor Greene and her staff. Who
13 else spoke? There were many. Several freshmen. I would have to go back and
14 refresh my memory for an exhaustive list.

15 Q So in the article, it refers to communications regarding January 6th
16 specifically. Were you in communication with any of those members about
17 January 6th?

18 A I want to go back just briefly. We also did communicate with Marsha
19 Blackburn on the Senate side, and members of Rand Paul's staff, I believe members of
20 Ted Cruz's staff as well.

21 Q When you say, "we communicated with," who are you referring to?

22 A Specifically, myself; Jennifer Lawrence, my fiance; and Amy and Kylie Kremer
23 from Women for America First.

24 Q Some of those communications, it sounds like, had to do with November and
25 December rallies. Could you describe sort of -- we can start in general terms and maybe

1 get into some of the specifics.

2 A Sure.

3 Q Generally, what are the nature of these conversations?

4 A So it adapted through the process. Initially, it was inviting -- mostly just
5 inviting them and then coordinating with them to appear at various rallies on the bus
6 tour, and it also eventually would lead to discussions about what the process inside the
7 Capitol would be on January 6th. I believe it was --

8 Mr. Nass. May I? What he means is the legislative process.

9 [REDACTED] Okay. Well, we can get to that, yeah.

10 Mr. Nass. I just want to --

11 The Witness. No, I appreciate that. And to be specific, I believe our -- the first
12 briefing call we got was with Nick Dyer and Marjorie Taylor Greene, where they describe
13 to us what the process would look like procedurally inside the Capitol on January 6th, so
14 the -- that we needed a Senator to make an objection, and a Member of the House could
15 then second that, which would then force the body to split off into their respective
16 Chambers where there would be a debate held.

17 So specifically, beyond coordinating having them appear at the various rallies,
18 there was -- we both applied pressure and tried to persuade Members of the House and
19 Senate to participate in the objections.

20 Q So when -- you mentioned an organizing call going through what that
21 procedural process was. When was that?

22 A I would have to go back and check my records specifically. I believe it's
23 referenced in one of the text messages that I provided. It's -- I believe it's specifically in
24 the text chat between myself, Amy Kremer, and Kylie Kremer, where the text makes clear
25 that she'd just spoke to Nick Dyer from Marjorie Taylor Greene's staff, and we had a call

1 with her at 2:30. So I'd be able to find the exact date then.

2 This process happened at warp speed, planning two bus tours and three D.C.
3 rallies. I think things happened very quickly, and so I'd prefer to try to stick to the
4 records as best I can as far as specifics, because a lot of it blurs together, to be honest.

5 Q Sure. Well, and it's fine to say that you know something happened but give
6 it a relative time period if you can.

7 A I believe it was after the December rally, but well before Christmas. So my
8 guess is somewhere around the 13th to the 20th would be the -- and I know, as I was
9 going through the text messages, that's specifically referenced.

10 Q Okay. Did you, Mr. Stockton, have any direct communications yourself
11 with any of the Members that you mentioned?

12 A I had direct contact with several of them at the event, although primarily,
13 those calls were done as a group on the bus, and I believe it was usually Amy's phone that
14 we were using to communicate with.

15 Q Okay. So if I understand you correctly, you did not have any phone calls
16 directly with any Members?

17 A I don't believe my phone had any phone calls, if -- I mean, we were on the
18 bus, and we would be traveling from stop to stop, and we would be making these phone
19 calls.

20 Q I guess, I'm trying to distinguish between a group call, like a conference call
21 kind of setting, versus a one-to-one communication that you may have had with
22 Members.

23 A Yeah. No, it was -- it wouldn't be one to one. It would be particularly
24 Amy and I and Members.

25 Q Okay. Now, in those conversations that you described with you and Amy

1 Kremer and Members, are those conversations where that's the whole group for the call,
2 or is it you and Amy are participating with a bunch of other organizers having a
3 conference call with a Member?

4 A Mostly it was Amy and I. Sometimes there would be another member of
5 our team like in the room with us, but there were never like a, to my recollection, I'd have
6 to make sure, but I don't recall having, like, large conference calls with many different
7 Members. I remember it as like calling them back to back to back to back to back to
8 back individually, and then making individual arguments that we thought would be
9 persuasive to each one.

10 Q Were these calls that you were making scheduled ahead of time with the
11 Members, or were these like cold calls to Member offices?

12 A I think it was a mix, but I think mostly we were just calling directly, like cold
13 calling out of the blue, or Amy would have set those up, I think.

14 Q Now, you mentioned in general terms what Mr. Dyer from Marjorie Taylor
15 Greene's staff explained in terms of the procedure. What guidance were you being
16 given from the Member side on these calls?

17 A So the first thing that stood out in that call is it changed what our plan was.
18 We even modified the route of the bus tour at this point. So the first thing that stood
19 out was that we needed to get a Senator or multiple Senators to make the initial
20 objection, that despite the fact that I believe we started with twelve Members of the
21 House who had agreed to object, that they could not make the initial objection, and so
22 we had to get Senators to make the objection. And so our most immediate concern
23 coming from that call was to persuade members of the Senate to participate in the
24 objections.

25 Secondly, the conversation as we discussed like logistically what it would look

1 like, turned towards how we would be -- how evidence would be presented in the
2 different Chambers and what that process would look like.

3 Q Okay. And so, you -- that was -- if I understood you correctly, those were
4 the objectives coming out of the call with Nick Dyer?

5 A Yeah, and kind of directed the rest of the calls, especially with Members'
6 staffs. Because we had been touring the country, and especially focused on the
7 battleground States in the initial tour, we had provided a platform to many people who
8 were making allegations of election fraud who had provided sworn depositions or
9 statistical analysis, and we had the opportunity to make a judgment on which was
10 strongest, who came across as credible, and who didn't come across as credible. And
11 so, we would provide guidance to Members and their staffs about who those people were
12 and then also make introductions where it was appropriate.

13 Q Now, when you say battleground States, what are you referring to?

14 A Specifically Georgia, Michigan, Wisconsin, Pennsylvania, Arizona. Did I say
15 Georgia already?

16 Mr. Nass. Yes.

17 The Witness. Georgia, Michigan, Wisconsin, Pennsylvania, Arizona, Nevada to a
18 lesser degree. I'm missing one or two. It'll come to me.

19 BY

20 Q But is it -- why those States as battleground States?

21 A Because the vote totals were very close.

22 Q So there was no sense of trying to identify voter fraud in cases that had
23 clearly gone for one candidate over another?

24 A We definitely were paying attention to everything we could see, but the
25 States that I identified -- and there's a couple I'm missing. It's driving me crazy. But

1 the States that we had identified as being especially susceptible towards manipulation
2 because of the close vote totals was definitely where our primary emphasis was.

3 Q So you've gone into some detail here on a call with Mr. Dyer from
4 Representative Green's staff. Do you remember other specific phone calls you had with
5 members during this time period?

6 A I remember speaking to Dr. Gosar and Tom Van Flein from his staff. I
7 remember speaking with -- I mean, Kim Paxton. I believe Louie Gohmert was on that
8 call. I had spoken with -- I remember calls with Marsha Blackburn. She actually
9 provided a video for us before the December event, and was one of the primary people
10 that we were trying to persuade to become an objector.

11 Q Okay. Let's start with Senator Blackburn and move backward then from
12 that. When you say you were trying to persuade her, can you tell me specifically what
13 steps you were taking to try to persuade Senator Blackburn to object?

14 A So, one, we shared the energy and enthusiasm that we were witnessing as
15 we were touring. We also applied pressure in that -- actually, so there's a better
16 explanation that I remember more clearly with another Senator, which is Senator
17 Kennedy from Louisiana.

18 Q Okay.

19 A We had rerouted the tour to add Louisiana, and the call we had -- or the
20 correspondence, I think it was a call, I'd have to double-check, but it could've been -- I'm
21 almost certain it was a call. His voice is pretty memorable. What we had said to both
22 him and Senator Hawley's staff was that we were coming with a bus to their State, and
23 we could either have a rally to -- that they were the bad guy, or we could hold a thank
24 you for doing the right thing rally.

25 Q And that was, rough timeframe?

1 A Second bus tour, which would be post December 12th, I believe. I'd have
2 to double-check, but between December 12th and January 6th.

3 Q Okay. And in that, were there direct conversations that you had with
4 either Senator Kennedy or Senator Hawley?

5 A Senator Hawley, it was his staff, and, again, Amy Kremer was the one who
6 facilitated that call. And Senator Kennedy, I believe that was direct.

7 Q And so then with Senator Blackburn, was that a direct conversation with the
8 Senator, or was that with her staff?

9 A So that was direct, and that was -- I didn't speak on that call, but was
10 listening to it between Amy and Senator Blackburn.

11 Q So this raises the question for me, generally speaking, how is it that your
12 group is able to get a direct audience, or line in to speak on the phone with a United
13 States Senator?

14 A So going back to the Tea Party movement in 2010, we have been
15 instrumental in many cases as early supporters. Senator Cruz, for example, I believe Tea
16 Party Express, which both Amy and I were a part of, had made an endorsement of him
17 when he was at like 2 percent in the polls and way behind. So we've developed these
18 relationships with the principals over the course of 10 years of political activism.

19 Q Okay. And so then, though, is it you who is making direct calls and getting
20 Senators on the phone? Is it Ms. Kremer?

21 A Amy's much better at maintaining those relationships than I am. I kind
22 of -- I come in and out. I don't participate in as many of the social functions as Amy
23 does. I'm more of a logistical guy. But Amy has a rock-solid Rolodex of everyone who
24 any of our groups have ever endorsed and participated. She really does an exceptional
25 job making sure that she maintains those contacts.

1 Q Okay. So with respect to the communications with Members of the House
2 on these objections, who is it that's initiating that set of objectives you talked about?

3 A So we would speak with -- so we had the first call with Nick Dyer. And we
4 have, for Jen and I, are probably -- the Member of Congress that we are closest with is
5 Dr. Gosar and his chief of staff, Tom Van Flein. And in many instances, Tom would direct
6 us to who was looking for an introduction somewhere and help facilitate that. And
7 Amy, primarily, was handling that aspect of it.

8 As we're doing these bus tours with multiple stops a day, I was managing the
9 stage show, if you will, like the production from that side, and then would join Amy on
10 the bus for many of the calls when we were between stops. So I have a somewhat
11 disjointed participation, because I would be both emceeding the event that was happening
12 outside, and trying to duck in and help make these calls.

13 Q So let me ask this a different way: Before the election season in 2020, did
14 you know personally about this objection process that takes place on January 6th every
15 election cycle?

16 A I knew roughly of it. I remember the Democrats in 2016 blustering about it,
17 but I don't think I'd ever witnessed it before and had no idea of the like details of it until
18 the call with Nick Dyer.

19 Q Okay. So if I understand you correctly then, the first you can remember
20 hearing about there being this opportunity to object to the electoral college on
21 January 6th was through this conference call with Nick Dyer?

22 A I believe so, yes. And I want to say it was December 18th or 19th
23 specifically, because I thought that the next natural -- my personal thinking was after we
24 did the December rally we were looking at when we would come back and do another
25 event in D.C. My assumption was that we'd do it at the inauguration, which seemed to

1 be like the next major point to me. And I believe Amy broached it in one of the text
2 messages that we should do this on -- the next time we should do it is on January 6th.
3 And I think we directed Cindy Chafian to secure the permits for surrounding those days.

4 Q So who, if you recall, initiated that phone call with Nick Dyer?

5 A Amy Kremer.

6 Q Okay. So it was her reaching out and -- I'm trying to understand --

7 A I'm not sure if Nick reached out to Amy or Amy reached out to Nick. I
8 just -- and it's reflected in the text messages. I'm out doing something or another, and
9 you have to be available 2:30 for this call with Nick Dyer. So I don't know what led to
10 that initial -- I believe they had an initial conversation, but I have no idea who initiated it.

11 Q And, so, on the House side, did you participate in any attempts to persuade
12 Members of the House to object?

13 A That was -- not so much with the Members of the House, because we had
14 lots of objectors. I mean, we started with twelve and it quickly grew. And, so, it was
15 less that most of the communication was around -- like I remember specifically -- and I
16 can't remember which Member, but Matt Seely had done a presentation in Michigan that
17 was -- that we found very compelling, and we were doing our best to connect him with
18 Members of Congress so that they would be aware of what he was providing.

19 Q And who is Matt Seely?

20 A Matt Seely, I'd have to go back and refresh. He -- I believe he was an
21 election worker in Michigan. He's from Michigan and had presented -- had done a video
22 presentation that we'd found compelling, and they'd we'd invited him to speak and found
23 him to be well-spoken and credible.

24 Q So if I understand you correctly, some of the conversations you had with
25 Members of the House may have been about this objection process; some may have been

1 about just the logistics of recruiting them or asking them to come speak at the various
2 events, and we'll go back in time and talk about those.

3 A Sure.

4 Q I want to just mention the names you have mentioned, and also the names
5 in this article and then you can tell me --

6 A Where they fall in that.

7 Q -- just generally --

8 A Sure.

9 Q -- what kind of communications, and if there's other communications I
10 haven't characterized, what those communications might be?

11 So Madison Cawthorn is one you mentioned.

12 A So Madison Cawthorn spoke at the -- our Supreme Court rally in December,
13 and those communications, I believe Jen initiated through Instagram, and primarily
14 logistical.

15 Q All right. Ms. Boebert?

16 A Ms. Boebert also spoke at several of our events, so those were also logistical.

17 Q Representative Good?

18 A Representative Good spoke at both the November and December rallies, and
19 I had -- he had been -- we were running way late on time in the November rally, and I had
20 asked him to only speak for like a minute and felt kind of guilty about it, but he'd been
21 very gracious about it. So I'd communicated with him and his staff about making sure
22 that they got a really good speaking spot at the December rally.

23 Q The article also mentions Mo Brooks.

24 A Mo Brooks would be logistical, surrounding -- like we'd invited him to come
25 speak. I also believe that he was -- I don't specifically recall the conversations, but my

1 recollection is that he was more involved with the -- like the coordinating of introducing
2 people we had met along the way with other Members of Congress. He seemed like he
3 was more of a -- had more of a coordination role.

4 Q Okay.

5 A But I don't remember that -- any of the calls specifically. It's just, if I'm
6 remembering it, right, it seems like he was more involved in the objection process.

7 Q The Rolling Stone article also mentions Representative Biggs.

8 A So Representative Biggs, logistical to speak. I believe we also specifically
9 reached out to Representative Biggs to question his involvement with Stop the Steal and
10 Ali Alexander.

11 Q And when you say, "question his involvement," what do you mean by that?

12 A To be frank, what the hell are you doing working with this guy?

13 Q Okay. And we'll get into that a little bit later. You mentioned
14 Representative Gohmert as well, I think.

15 A I love Louie. Representative Gohmert, logistical. He spoke at the
16 December rally -- or the November rally. I don't know if he spoke at the December rally.
17 But he was also involved in a confrontation over control of the stage at the November
18 rally with Alex Jones, that after we filed -- after Kylie had filed a police report over an
19 incident on December 11th, I believe we'd reached back out to Congressman Gohmert
20 about his recollection of what happened on the stage in November.

21 Q And that conflict, does that relate to Alex Jones?

22 A Yes.

23 Q Okay. We'll talk about that, too. You mentioned Attorney General
24 Paxton, I think, from Texas?

25 A Yes.

1 Q What were those communications about?

2 A That was about recruiting other attorneys general to sign on to the Texas
3 lawsuit, and Pat specifically -- Pastor Gibson connected us directly to General Paxton, and
4 myself and Matt Couch and -- it was the secondary bus, right. We had the leadership
5 team bus, then we had a secondary bus at that point with, like, speakers and influencers
6 and bloggers. I remember Matt Couch and I sitting, and he was dialing attorneys
7 general directly to ask them to sign on to the Texas lawsuit by Paxton.

8 Q Now, with any of these Members, were there communications initiated by
9 them to you, or to Ms. Kremer, trying to give guidance for what you should be doing?

10 A Not to me directly, and I don't think -- I can't recall, or I don't know whether
11 or not -- who initiated what with Amy, but that we were communicating regularly with
12 lots of Members.

13 Q And I guess, I think it's clear, I'm trying to distinguish between what might be
14 seen as lobbying or trying to persuade, or trying to inform Members who otherwise aren't
15 going to hear from you if you don't reach out, versus people who you're trying to include
16 as part of your strategy decision-making process if that makes sense. Are there people
17 of the Members you've mentioned that really you would have considered like they're
18 helping to provide us guidance about what we should be doing?

19 A I recollect Mo Brooks being in that category. Tom Van Flein and Dr. Gosar
20 would definitely be in that category. Louie to a lesser extent. Congressman Gohmert
21 has always been a gem at helping us provide like procedural Roberts' rules of orders stuff
22 as far as what the legislative process looks like. So if we had questions like that, he
23 would kind of be our go-to there.

24 I would say those, if -- I guess, your question comes across somewhat as like
25 maybe who we were looking at as leaders, or people that we were looking to take

1 guidance from. I would say, specifically, Congressman Gosar. I recollect Mo Brooks to
2 a lesser extent. And on the Senate side, I would add Senator Blackburn to that list.

3 Q Okay. You also, before I forget, mentioned the staff of Senator Paul and
4 the staff of Senator Cruz. How would you characterize those communications?

5 A Senator Paul's staff was frankly incredulous that we would even bring it up,
6 and we quickly checked Senator Paul off the potential -- like the list of people that could
7 be persuaded. Senator Cruz, Amy -- I was not there for that call, but I remember Amy
8 characterizing it as -- right, because I remember her specifically using the "We endorsed
9 him at 2 percent" line, and I believe that she had been successful at getting him on board.

10 Q Let's talk about the communications with Congressman Gosar's office, and
11 you mentioned having the relationship with his -- with Tom Van Flein. That's his -- at
12 least was at the time his chief of staff, correct?

13 A I believe so, yes.

14 Q So can you describe sort of what your relationship has been like -- you
15 mentioned, I think earlier, you and your fiance, Ms. Lawrence, sort of having a closer
16 relationship with Representative Gosar. How did that relationship form?

17 A I believe the -- going back many years, I -- we had worked elections in
18 Arizona, being from Nevada. It's a neighboring State that's very competitive. We had
19 seen Dr. Gosar at many events that I was speaking at, or where we were endorsing
20 candidates.

21 I remember specifically, I asked Congressman Gosar and Congressman Gohmert at
22 one point to help my daughter with her fourth-grade video project, and they both gave
23 her interviews. And Congressman Gosar has been our best resource inside the Congress
24 for when we were doing a variety of activist campaigns.

25 Over the years, I used a program, that has since been taken offline, but called Rally

1 Congress, to help connect Members of Congress with their constituents or their
2 constituents contact their Members of Congress, and over the years have sent -- have
3 helped facilitate sending more than 5 million individual messages from constituents to
4 Members of Congress.

5 And so, Congressman Gosar and Tom would be kind of our first point of contact as
6 we would set those things up to both get an idea of what they thought was possible as far
7 as what we could really get accomplished so that we could try to tailor those campaigns
8 to be effective.

9 Q Okay. And so, then, how did that relationship come into play for the work
10 you were doing between Election Day 2020 and January 6th?

11 A So Congressman Gosar was, obviously, one of the first people that we looked
12 to to kind of direct us on where to go. We also knew that, right, he was one of the most
13 outspoken Members of Congress out of the gate. So primarily, he's somebody that we
14 looked to for guidance on legislative matters, or political matters in general, and so that's
15 kind of how, I guess, I'd characterize it.

16 Q Okay. And what particular guidance did he provide to you about what you
17 should be doing during that time period?

18 A We really didn't need too much guidance. It was more encouragement, I
19 would say. He also -- it also -- I mean, we'll just dive right into it. The call that really
20 stood out to Jen and I was, it was a call, I believe, that Tom and Dr. Gosar were calling
21 from their office, that Tom had said that they had just left the Oval Office where they
22 were talking to the President about possible pardons, and our names specifically had
23 come up and We Build the Wall, and that they would be submitting paperwork to
24 facilitate a blanket pardon for We Build the Wall.

25 Now, it was a -- I remember we spoke at -- it was somewhat confusing, because

1 neither my fiancée or I have ever been charged with anything in that matter, but it was
2 still hanging over our heads. And we were concerned about, most specifically, Brian
3 Kolfage, the triple amputee who had started the project, because when we designed that
4 project, he was not a lawyer, he was not an activist in any way.

5 And so when I put that project together and the plan together and the staff
6 together, we had built it to protect him specifically, and that the bylaws went out of the
7 way to make sure that he didn't incur any of that kind of risk. And so we were elated
8 more specifically for Brian, but also for us, that if the legal case went away, a lot of our
9 problems went away. So it was a very encouraging thing to hear.

10 Q And that was something --

11 A I also want to add that specifically he said that they were going to go to
12 other Members of the House Freedom Caucus, which I have lots of relationships with,
13 and that they would rally them to also sign a letter backing that pardon.

14 Q Okay. And do you have a ballpark recollection of when that phone
15 conversation happened?

16 A I believe it was when we were in Louisiana, so I -- I'm not 100 percent sure of
17 that. I imagine if I go through my texts, there's texts of Jen and I telling people, like,
18 Hey, I think -- like sounds like a pardon is coming for We Build the Wall. We were
19 excited about it. But I believe it was between like mid-December, after the
20 December 12th rally.

21 Q And you -- I think you said that that -- those comments made about the Oval
22 Office meeting were made by Tom Van Flein?

23 A Tom, yes, I believe so.

24 Q Okay. Did Congressman Gosar say anything specifically on that phone call
25 about the pardon?

1 A I can't remember which of them said what, but it was clear that as of, right,
2 as a team, as a staff, like as an office that that's what had happened.

3 Q Right.

4 A So --

5 Q The reason I'm asking is, I think you know --

6 A Sure.

7 Q -- that Congressman Gosar, in response to that article mentioning that, has
8 issued a denial about blanket pardons.

9 A But I will say that we had -- well, it's funny, because he tweeted about it
10 shortly thereafter. Like shortly after our conversation with him, he had put a tweet out
11 talking about a pardon for We Build the Wall. And so, that denial seemed like it was a
12 knee-jerk response to, like, how they respond to the media in general.

13 Q And I think -- I don't have this as an exhibit, but I can just tell you that part of
14 the denial, I think, from October 31st of 2021 from a bulletin issued by Congressman
15 Gosar's office, mentions this Rolling Stone article, and suggests that the blanket pardon
16 was related to January 6th events. But I understand you to be saying that the blanket
17 pardon discussion was about --

18 A We Build the Wall.

19 Q -- We Build the Wall, not about January 6th?

20 A Absolutely not.

21 Q Now, did they say anything about the relationship between this potential
22 pardon and the work you were doing at the time with this post-election dispute stuff?

23 A Not directly. I mean, again, there was a sense that we'd gotten the
24 President's attention with what we were doing, right, that he was watching, which we
25 interpreted with the -- we were in the Oval Office and your name specifically came up,

1 and then after we talked about the pardon it was keep up the great work.

2 And to us, we interpreted that to mean that we'd gotten the President's attention,
3 and he was aware of what we were doing and it wasn't hurting our case to land a pardon
4 for We Build the Wall.

5 Q Right. And certainly, it's -- I don't think, controversial to say, it's in your
6 interest to hopefully see that President Trump would remain in office if this is something
7 that could potentially happen?

8 A Absolutely. Well, there was a -- there was another meeting I've tried to
9 find. I can help produce this in the coming -- like going forward. There was a
10 conversation we had with another member of the administration late at night outside the
11 Willard, I believe, in the December rally, where Jen and I were outside smoking and a
12 member, I believe he was from the Vice President's office, I'd have to double-check, but
13 had kind of pulled us aside, showed up like a -- it was like 1:00 in the morning.

14 He had -- he explained that he was going on an overseas trip, and that the boss
15 was planning to make -- no matter how things went, was planning to make sure that
16 people were kind of taken care of, specifically in regards to We Build the Wall.

17 So there was another incident that it's -- I've been trying to find his card. I'd
18 never interacted with him before or after, but there was that secondary, and, I believe, I
19 provided the business card to Lyndon Brentnall at RMS Security to look the guy up to
20 make sure that he was legitimate.

21 Q And you don't --

22 Mr. Nass. Pardon me. Can we take a 5-minute break, please, Dustin and I?

23 [REDACTED] Sure. Let's go off the record.

1 [11:04 a.m.]

2 [REDACTED] Okay. We're back on the record now.

3 And just to -- I understand you may want to take a smoke break at some point.
4 Just to give you a sense of where we're headed in terms of the timing, I think that if
5 you're okay to hold out, next break, it might make sense if we just make it, like, a lunch
6 break.

7 The Witness. That's fine.

8 [REDACTED] It's 11:00 now. So if you think you can go till noon?

9 The Witness. I think I'll be all right.

10 [REDACTED] Okay. Perfect.

11 The Witness. Somehow I'll manage.

12 [REDACTED]

13 Q So you were just talking about an interaction you remember the night after
14 the December 12th rally.

15 A I believe it was the night after. It could've been the night before. Things
16 really bleed together --

17 Q Sure.

18 A -- at that point, dealing with not a lot of sleep. But there was specifically
19 another interaction outside the Willard from somebody who represented himself as, like,
20 a true believer but who was from the Vice President's office.

21 Q Okay. And that person gave you a business card indicating they were a
22 member of the Vice President's staff?

23 A Correct. And spoke specifically about an overseas junket that we saw
24 verified in the press.

25 Q And you said this person told you that the boss was going to make sure

1 people were taken care of. Who did you understand that to refer to?

2 A It was very broad, but, specifically for us, everything pardon-related was We
3 Build the Wall. It's really the only legal trouble that Jen and I have ever had, and we had
4 no expectation that anything criminal would happen at any other point.

5 Q And I want to be clear. I'm not asking you to get into any of the details of
6 the We Build the Wall --

7 A It's a pretty awesome project.

8 Q -- information --

9 A We actually built that thing.

10 Q I --

11 A You may not have read that in the press.

12 Q I just want to clarify for you that we are aware of what's in the public record
13 about that case, and obviously we know ultimately there were some pardons. I just
14 want to make sure that you understand the questions I'm asking really just have to do
15 with this pardon --

16 A Sure. I --

17 Q -- dynamic.

18 A I just -- I think it's important to make sure to specify that anything
19 pardon-related was backwards looking towards We Build the Wall. I think some of the
20 press has characterized some of what was in the Rolling Stone article that we were being
21 offered a pardon for what was coming, and that's just, frankly, a mischaracterization.

22 Q Sure.

23 So, specifically, when this individual from the Vice President's staff said "the boss,"
24 who did you understand that person was referring to as the boss?

25 A President Trump.

1 Q Now, did you or Ms. Lawrence make any direct requests to the White House
2 for a pardon?

3 A No.

4 Q Separate from the conversations from Representative Gosar's office, were
5 you lobbying anyone else for a pardon?

6 A No. We didn't even think that a pardon would apply to us, because we
7 hadn't been charged. So even the conversation with Tom Van Flein and Congressman
8 Gosar had left us somewhat confused because we'd never been charged with anything, so
9 how would we accept a pardon for something that we weren't accused of.

10 Q And so the question I'm asking is just trying to get to the sense of where did
11 this idea of a pardon even originate.

12 A Well, there was a violent raid that happened to us August 20th. It also
13 ended up being the primary motivator for Jen and I to do this tour. So the way the raid
14 was carried out, the fact that our political network, which included the campaign seal of
15 the winning 2016 campaign, was disrupted that way 2 months before the election, led
16 us -- that was what primarily motivated our belief that the election had been improperly
17 interfered with.

18 And so the idea of the pardon for We Build the Wall made a lot of sense to us,
19 because it -- for several reasons: the timing of it, the -- I have to be somewhat careful
20 here, but the -- the unfactual information contained in the indictment of the people who
21 were indicted in that matter, where, specifically, when I had time to go through and go
22 through the indictment, I had evidence that was exculpatory to some of the claims that
23 were made within the indictment. That fact led us to believe that that action -- so that
24 raid was actually part of the broader election interference issue that we were raising.

25 Q So I guess my question is a simpler one, which is this: When you hear from

1 Tom Van Flein and Congressman Gosar's office about this conversation, that your name
2 came up in the Oval Office, before that phone call, had you spoken with Congressman
3 Gosar's office or staff about the potential for you to be pardoned or protected or remove
4 any doubt about liability?

5 A No, we hadn't.

6 Congressman Gosar had been involved in the We Build the Wall project. We had
7 sought his advice several times going into that. He also appeared at the symposium
8 Louie put together after we completed construction. But we had never sought that out,
9 except to be -- except as generally publicly advocating that Brian, specifically, we give him
10 a pardon.

11

12 Q I'm sorry. When you say "publicly advocating," are you saying, like, on
13 social media?

14 A Social media, probably Substack. I'd have to go through and review my
15 articles.

16 But I was -- I was very passionate and felt a responsibility to protect somebody I
17 saw as a war hero, a regular citizen who had sought the advice -- who had -- we'd brought
18 on these expensive attorneys, Kris Kobach, the former AG of Kansas, Steve Bannon, the
19 former White House chief of staff -- or, I'm sorry, chief strategist. We had specifically
20 went to get him what we thought was the best people to help guide him through that
21 process. And I felt a -- because I had facilitated most of those introductions and
22 agreements, I felt a particular responsibility to try to help Brian out of the legal jeopardy
23 he was in.

24 Q Did you talk to anyone at the White House about the pardon?

25 A No.

1 Q Now, obviously, I think you know that Steve Bannon did receive a pardon for
2 the We Build the Wall conduct in January 2021. Did you discuss the possibility of a
3 pardon with Steve Bannon before he was pardoned?

4 A No. So one of the difficult things in all this, having been a -- I mean, the
5 media describes me as a longtime Bannon associate, which doesn't happen to many
6 people because he's tough to work with. Having -- when the raid happened in August
7 and the indictments were handed down, Steve and Brian and Andy and Tim were all
8 issued gag -- or orders not to speak to anybody related to We Build the Wall, and we
9 honored that all the way through the process.

10 Q So --

11 A I should say, to clarify, outside of a short greeting one time in the lobby of
12 the Willard.

13 Q So, after January 20th of 2021, did you find out why you were not selected
14 for a preemptive pardon?

15 A Not -- not conclusively.

16 Q What do you mean by that?

17 A So I assume that -- well, to be specific with your question, I assume I didn't
18 get a pardon because I wasn't charged with anything.

19 Why Steve Bannon got a pardon -- Brian Kolfage -- is something that has, frankly,
20 angered and frustrated me immensely. Steve is the one person in the group who had
21 the money and political connections to handle something like this. That he would be
22 the only one to receive it just seemed absurd on its face to me.

23 Q Before we get away from the topic, you mentioned the conversations with
24 Members of Congress about the objections that would need to be made on January 6th.
25 Why were you asked to -- or, what was your understanding of the purpose of making

1 those objections on January 6th?

2 A So there was a sense of frustration that the media had immediately come
3 out and said that "no evidence, no evidence, no evidence" before we'd really had any
4 opportunity to wrap our head around if there was evidence or not. I mean, we had bits
5 and pieces that we had seen.

6 The court cases had largely been dismissed based on procedural grounds, right?
7 Things like standing. So we felt that we hadn't had the opportunity to really present our
8 case to the American people more broadly.

9 And my understanding of this process with Members was that that was our -- that
10 everybody was -- mostly everybody was realistic about the possibility of actually
11 overturning the election this way, but we saw the objection process as being our
12 opportunity to have all the cameras on and present everything we had found that we
13 thought was compelling that made the argument of why we were so passionately running
14 around the country and holding these rallies.

15 Q What do you mean about being realistic about the potential for overturning
16 the election?

17 A I think Matt Boyle had an article in Breitbart right before that that became a
18 point of controversy for a lot of the organizers of these different factions that had sprung
19 up because of who was put on the people who would be speaking on the 6th and who
20 wasn't and the confusion surrounding that.

21 But, in that article, he very clearly expresses, like, listen, this objection is not going
22 to change the fact that Joe Biden is going to be the President. However -- and we were
23 realistic about that. But we saw it as an opportunity that, when we had this kind of
24 dramatic objection and the Senate splits off and the House splits off and we have these
25 hour or two to make the argument, that that would be our opportunity to present our

1 case to the world, even if it didn't change the result of the -- like, what was going to
2 happen, that the electors would have to be sat in accordance to standard procedure.

3 Q So, if I'm understanding you correctly, it's an opportunity to be heard on the
4 information you think should be made public, but, realistically, you did not expect to
5 change the outcome that Joe Biden would be inaugurated.

6 A Yeah. I mean, we've reached a point where persuasion doesn't seem to
7 play that much of a role in voting anymore, like, in legislative voting. Right? Things
8 seem to -- especially on these big, controversial issues, seem to be locked in. The cake's
9 baked before any of the arguments are made.

10 But we were frustrated that we'd never really had the opportunity to, like, present
11 our case. And we saw that objection process as, like, that was the moment.

12 And we actually talked about it like you would a court case, that the opening
13 statement would be the rally at the Ellipse, then different Members of Congress would
14 present different parts of the case to the public, and then there would be a closing
15 argument made at the Ellipse, where everybody was supposed to -- well, our
16 understanding, I should say -- and when I say "our," Jen and I's understanding was that
17 everyone would stay at the Ellipse until the proceeding, like, the legislative procedure at
18 the Capitol had reached its conclusion.

19 Q So you mentioned going in -- earlier, I think you said something about
20 identifying people and trying to connect them with Members or provide information
21 about allegations in the States.

22 A Yes.

23 Q Could you tell me a little bit more about what that process looked like,
24 maybe with some examples?

25 A Well, I'd say, Matt Sealy, I specifically remember that one. We had seen a

1 video presentation. We reached out to him, I believe, through Meshawn Maddock, I
2 believe, because we found it to be -- there was a lot of stuff that seemed kooky and not
3 legitimate, like, as far as the allegations of what happened, right? And so we were
4 trying to -- because we were consuming all of this and we were also giving people a
5 platform to speak on our stages at rallies in these different States, we kind of knew who
6 was credible or who came across as credible and who didn't and which evidence came
7 across as credible and which evidence came across as, frankly, ridiculous. And --

8 Q How did you make that determination between credible and not credible?

9 A Just as -- as a normal citizen, right, which is -- and also as somebody with an
10 advanced understanding of the, like, election processes, having been a long-term political
11 operative.

12 The way we would -- what would help us determine: Frankly, some people were
13 standing up and saying things that just sound, right -- you could just tell that, like, the
14 conspiracy necessary to make that happen was not realistic.

15 You were also seeing now, like, people make vastly more credible and seemingly
16 accurate statements from people who had more realistic backgrounds. They weren't as
17 partisan or they -- right? They didn't come across as just less credible.

18 And so the Matt Sealy thing -- I think there was some of this with State Senator
19 Mastriano in Pennsylvania too. We'd been following along with what he was doing.
20 There was several people who were doing statistical analysis who had prestigious
21 educations in mathematics and statistics who were also doing, like, some statistical
22 analysis that we felt was really strongly compelling. And we would connect Members
23 and their staffs with those people when we met them.

24 Q And, to clarify on that, were you receiving guidance from Members about
25 what kind of evidence to be looking for? Or was the communication, sort of, the other

1 direction; you were made aware of things and then you were trying to filter that
2 information up to Members?

3 A Amy primarily was, like, the centerpiece of those communications. And it
4 was definitely a mixture of both, which is -- I think that -- State-related, so the objectors
5 from each individual State were obviously interested in what the best stuff we had seen
6 as far as election fraud in that State.

7 There was also, right, like, with Matt Sealy or Senator Mastriano, when we would
8 listen to what they were saying or if there was something that was particularly
9 compelling, we would make sure to pass that along.

10 Q You mentioned Mr. Mastriano from Pennsylvania. Are there other State
11 elected officials other than -- you mentioned Attorney General Paxton earlier. Setting
12 those two examples aside, additional State elected representatives that you remember
13 having communications with like that?

14 A I know we -- there were a lot of them who came across our stages. Frankly,
15 the only ones -- I remember Attorney General Paxton. I remember Attorney General
16 Landry, the Louisiana attorney general who was opposed to the legal strategy. And then
17 Senator Mastriano. Matt Maddock, Michigan, have a long-term -- he's a State
18 representative in Michigan -- we have a long-term relationship with him and his wife for
19 campaigns and activism we've done in Michigan over the years. Those are the only ones
20 I remember specifically.

21 Q Okay.

22 We're going to talk about, in detail, the planning for January 6th in a little bit.
23 But, setting that aside, during this time period of traveling the country, were you in
24 communication with either the White House or the Trump campaign to get guidance or
25 coordinate your actions?

1 A So we had made a decision early on that all of that communication would be
2 filtered through Amy Kremer. You don't want to, for example, like, be contacting -- you
3 don't want five different people contacting the White House or the campaign with the
4 same information.

5 A And so we had settled early on, since Amy had the closest relationship with both
6 the Trump family and the administration, that she would be the primary filter there. But
7 there was probably dozens of examples of Amy relaying to us what she was hearing from
8 the White House and the campaign.

9 Q Were you ever present for communications with the White House or the
10 Trump campaign?

11 A The only one I specifically remember after the -- I remember Amy telling me
12 that the President was going to do a flyover for the December rally. And then I
13 remember her on the phone with Mark Meadows. And this is in front -- like, we have
14 a -- in the suite in the Willard, and everyone was sitting around a large table, and her
15 hanging up the phone and saying, "I just got off the phone with Mark Meadows, and he
16 wanted to congratulate everybody on a job well done."

17 Q So, other than those two recollections, are there any other communications
18 that you remember --

19 A I -- but --

20 Q -- being present for with the White House or the Trump campaign?

21 A Can we come back to that question? I want to mull it over. I think there
22 were. A lot of this bleeds together, like, in my recollections of what came back to me in
23 message or what I could've been on the bus for as she was talking to it.

24 A But it -- another -- I don't know if they're technically the White House or the
25 campaign, but I do remember, when we were heading to Las Vegas for Christmas, we

1 needed a place to park these buses -- or a bus. Anyway, we had a parking issue with the
2 bus. And Scott Johnston, who is a long-term volunteer and friend of Jen and I's who,
3 like, we kind of looped into this process, we needed to -- we wanted to park the bus at
4 the Trump Hotel in Las Vegas, and he called the hotel, and the hotel manager had told
5 him that the only way he'd let us do it is if a member of the Trump family personally
6 called him. And I remember Amy immediately getting on the phone with Lara Trump
7 and getting that done right away.

8 Q So the reason I ask about that is, to get back to the October 25th Rolling
9 Stone article that sort of provided the jumping-off point for us this morning, it describes I
10 think from you or Ms. Lawrence, you know, the statement that Mr. Meadows was 100
11 percent made aware of what was going on and that he's a regular figure in these really
12 tiny groups of national organizers.

13 And so what I understand you to say is, obviously, to the best of your recollection
14 right now, you don't remember having, other than the three conversations you've
15 mentioned --

16 A So -- and there's actually a ProPublica article that preceded that article that
17 we also go into detail on this on and provided the same chain of events to their
18 fact-checkers.

19 So, very specifically, we had an issue with the permits being changed temporarily
20 by Cindy Chafian that had, I see it as, kind of a butterfly effect point. When we go back,
21 I'm sure we're going to get into detail on that, because it's critical in all this.

22 But, as part of that, there had been, I call it an appeasement deal made with some
23 of the other organizing elements that, frankly, we had been working to suppress and who
24 had been attacking what we were doing relentlessly. We were -- we had chosen a tack
25 not to even acknowledge them, to the best of our ability.

1 We had had the -- in the initial November rally, there was a blowup between Kylie
2 Kremer and Ali about what could be said on the stage and what couldn't be said that had
3 split, like, that initial group up irrevocably. And so, as we were doing all this stuff, there
4 was them attacking us and us ignoring them for the most part.

5 We were asked to -- so, for January 6th, initially the plan was to use the same
6 template that we had used in November and December. Because, frankly, for
7 organizing purposes, it was -- we knew what -- we had all the -- everything put together
8 already. We had the permits and paperwork. Everything would look very similar to
9 what we did in the November and December rally -- same vendors, et cetera, et cetera.

10 When we found out just before Christmas that the President was going to speak,
11 that changed -- like, the whole plan changed completely and, frankly, got taken out of our
12 hands.

13 I should exclude -- Kylie Kremer left the bus tour, flew to D.C. to kind of join
14 the -- to represent us on what would become the January -- what would become the rally
15 at the Ellipse.

16 As part of that, I mentioned that we had reached out to Biggs about, like, what are
17 you doing? Like, why are we associating -- like, here are some of his Periscopes where
18 this guy's talking. You know, like, is this really what we want to be promoting here?

19 With the pastor -- Pastor Locke and Pastor Gibson, who were on the bus tour with
20 us, there was kind of an appeasement deal reached. And this deal was that we would
21 set up a rally on January 5th, same template -- Freedom Plaza stage, jumbotrons,
22 secur- -- the same template we'd been using, that would be split into four separate
23 sections. So you would -- initially, it was Katrina Pierson/Save America would have the
24 first 2 hours, the pastors would have the second 2 hours, Ali would have the third 2 hours,
25 and Cindy Chafian and Alex Jones would have the final 2 hours.

1 And we didn't -- I didn't like it, but I was asked to help kind of play Switzerland in
2 that, because I hadn't been engaging in any of the, like -- I hadn't really been engaging
3 much in the, like, fighting, because I was so busy putting all this stuff together. So I'd
4 been asked to, like, help facilitate that and help guide the pastors into the agreement and
5 the permitting process and politically what it looked like.

6 And part of that agreement was that all planning and promotion of anything but
7 the one rally on January 6th would stop. And we saw a tweet from Matt Couch, who's a
8 friend of mine, that was continuing to promote this event at the Capitol. And we sent
9 that around, like, one of the internal groups, and were upset by it.

10 And what we decided -- me and Amy put our heads together and decided that it
11 seemed like there was a stalemate between the two factions and the D.C. organizer
12 group. One side was, as we were being told, one side was Katrina Pierson and Kylie,
13 who were advocating for no involvement of the Ali-Alex Jones faction, and Caroline Wren,
14 who was kind of, like, advocating for their participation.

15 And that showed us -- I was upset because part of the agreement was that they
16 would drop promotion of it. And I, frankly, didn't want to work with them in the first
17 place, right? But I had agreed to kind of do this January 5th thing and help out with it on
18 the understanding that, like, all right, this is going to stop the crap and we're going to
19 come together for this one last thing and drop all this infighting.

20 And so we put our heads together, and we decided that we would go over
21 everybody's head. And we specifically talked about reaching out to Mark Meadows and
22 other people with direct regular contact with President Trump, including Mercedes
23 Schlapp and Gina Loudon. I mean, it was kind of a -- we kind of decided, like,
24 we'll full- -- and the family -- let's full-court press this. Like, let's put an end to this
25 garbage.

1 I believe I went outside to do a rally, and, shortly after that conversation, Amy
2 sends a text to the full group that both the White House and the campaign are aware of
3 the Ali and Cindy situation and it's taken care of, or it's handled. I'd have to go back to
4 look at it. But I took it to mean that, like, their participation is done. Like, the
5 stalemate is over, it has been settled and in our favor.

6 Q That's very helpful. And there's obviously a lot of detail in the explanation
7 you just gave.

8 A Absolutely.

9 Q So I'd like to pick back a couple of things, just to get clarification.

10 A Sure.

11 Q One thing you said was having raised concerns to Representative Biggs about
12 Ali Alexander. What were the concerns that you had about Ali Alexander?

13 A So he had been making unhinged public statements. I mean, from our
14 perspective, he was kind of mentally ill and was exhibiting signs of a messiah complex,
15 like, you know, technically. Like, we were genuinely concerned.

16 He had also been leveling really serious attacks against the Kremers that were
17 misogynistic. And him and Roger Stone and Alex Jones had been attacking us because
18 we -- for being too soft, that we wanted -- that we were doing Tea Party rallies and that,
19 you know, this called for far more masculine and angry action.

20 And having traveled the country and having done this for a long time, we knew
21 how high tensions were, and we were concerned, like, between the Periscopes, which
22 made it very personal, I mean, calling the Kremers fat and, you know, Miss Piggys and
23 gluttons and -- right? -- really nasty attacks. Alex Jones was calling me Satanic Santa on
24 his show.

25 We saw what they -- while we weren't engaging with them publicly, because we

1 didn't -- as I kept saying to the group, we didn't want to reach back and elevate them to
2 our level by engaging in fighting with them, we were paying close attention to what they
3 were doing. And we had real concerns about both their -- about their rhetoric, about
4 what they were doing, but then, secondarily, there were several instances where it was
5 clear -- so, after the November rally, which was kind of, like, all one, they did their, kind
6 of, own thing in December in D.C., where -- and this is kind of a tangent, but I'm just going
7 to run with it, because it's necessary to explain.

8 So I get a call from Jason Funes on the morning of December 12th before the rally
9 at Freedom Plaza was set to start. Our program was: event at Freedom Plaza starting
10 at noon that runs for, like, 3 hours; and then, an hour later, a second program starts at
11 the Supreme Court. And we move people from Freedom Plaza to the Supreme Court,
12 where we have a second stage set up.

13 I get a call from Jason, who was at the stage at the Supreme Court, telling me that
14 apparently General Flynn is going to be here in a couple minutes and he expects to speak
15 on our stage. And that was somewhat disconcerting, right, because we didn't want
16 people at the Supreme Court. Like, we had this whole program put together.

17 So I grabbed two of our security guys, and we jumped on a golf cart. And, on the
18 way, I called Patrick Byrne, who I'd met with the night before, and confirmed that,
19 indeed, General Flynn was on his way to the Supreme Court to give his first speech since
20 being pardoned, right, and didn't have the legal stuff hanging over his head.

21 And I got there, and I don't know what Jason had said to the crowd, but it was
22 kind of a volatile situation, because the Kremers were adamant that, no, we're not going
23 to let anyone use our stage in this circumstance. But I was sent to deal with it. So I get
24 there and quickly make the decision that we would allow General Flynn to speak in this
25 instance.

1 An activist, who has since passed, Alice Butler-Short, had put together a program
2 that included another Member of Congress, who I'd have to go back and -- I can't
3 remember. I think it was Connecticut or something. I didn't know him before. But
4 she had a whole program put together. And they had -- they were under the impression
5 that they had paid for the stage at the Supreme Court, and -- because they'd given money
6 to Ali. This is as it's explained to me, like, on the ground.

7 And General Flynn shows up, and me and General Flynn get into a heated
8 engagement about whether or not -- like, what's going to happen with the stage here,
9 because, as I explained, like, I'm not going to let you guys do your full program because it
10 would bleed into what we're doing at Freedom Plaza in a little bit. So I'm willing to let
11 you do this because I think what you've done warrants that, but I'm going to set -- before
12 you speak, I'm going to introduce you and I'm going to let the crowd know that, like,
13 you're not doing your full program. I will -- I will be generous and, despite, like, what
14 the Kremers are telling me right now, I will allow you guys to do, like, a truncated version
15 of your program.

16 So, you, General Flynn, can speak, and the girl can sing the national anthem, or
17 whatever patriotic song she sang, and any Members of Congress that you have can speak,
18 and then we're going to cut it off, and I'm going to get back on stage, and I'm going to
19 send everybody back to Freedom Plaza.

20 And we had kind of a brief, somewhat heated exchange over that where I
21 eventually just said, no, it's happening this way or I will cut the mikes and you guys will do
22 nothing.

23 And so there were several examples where I would find out later that people had
24 given Ali money to set up specifically a stage at the Supreme Court that never got done,
25 and so, when they saw our stage at the Supreme Court, they assumed that that was their

1 stage.

2 And then this came up in a conversation I had with Alex Jones, where he assumed
3 that the stage -- because we had two -- in November and December, we had issues with
4 Alex Jones and our stage at the Supreme Court. When he apologized to me about it on
5 January 4th or January 5th, he explained to me that he wasn't an organizer; he had paid
6 money for a stage at the Supreme Court and had assumed the stage at the Supreme
7 Court was his.

8 We also had concerns about security. So we used licensed, insured security to
9 handle, like, crowd security. I mean, these guys -- like, these guys do major concerts.
10 They work with Live Nation. They are professionals. They are not volunteers. No.
11 Lots of people wanted to volunteer to help with security stuff. We would do our best
12 to, like, give them stuff that made them feel they were involved, but that the actual
13 security was handled by people who were licensed and insured. We did not see that
14 same level of professionalism from the security that Ali was running.

15 And a specific example: In November, I remember us teasing or joking
16 about -- Ali had these four Special Forces-looking guys that we later found out was from
17 the 1st Amendment Praetorian, right, that literally would have -- like, would be on -- he
18 had four of them, and they were touching him at all times everywhere he moved around,
19 which, from a professional security standpoint, like, it was really kind of silly, right,
20 especially when I'm sure I was getting the same level of threats and intensity that he was
21 and I was running around by myself on a golf cart all over the place trying to get stuff
22 done.

23 And, in December, Cindy wanted to use the 1AP to do our security. And we had
24 hired RMS at that point to handle our security. We didn't have them in November
25 because we, frankly, were caught somewhat off guard by how big the crowds were at

1 that. December, it was clear we needed topnotch security.

2 The 1AP folks gave us a security briefing, a security briefing that, frankly, when we
3 compared it to the security briefings that we were getting from the professionals, was
4 laughable. Like, it was not to the same level. And so there was a genuine concern
5 about -- the example I used was that Hells Angels in '69 being hired, right, and put into
6 the Summer of Love, quite famously.

7 And so there were concerns about the rhetoric, right, and what they were
8 advocating for, and then there was also concerns about, like, their ability to pull off
9 something of this magnitude safely.

10 Q How would you distinguish what they were advocating for versus what your
11 group was advocating for?

12 A So their group -- Jen says it better than I do, but, as she says, these assholes
13 will run around yelling "1776," "This is the revolution." And we were running what
14 essentially we've been doing for 10 years, like, Tea Party rallies, which is, yeah, we're fired
15 up, we're passionate, but, like, we clean up after ourselves and we visit local businesses,
16 you know? And, like, we don't want to portray ourselves in a way that would weaken
17 our credibility with the public.

18 And so the primary dispute -- and they were very specific. Roger Stone and Ali
19 very specifically and in their public Parlor posts and social media posts were very specific;
20 they think, they're not allowing people on their stages who speak too harshly -- because
21 we'd just had an incident at one of our rallies where a speaker we didn't really know that
22 well, we give them a chance to get on stage, and he talked about putting a Glock to the
23 head of anyone who shows up at his door, like, to vaccinate his kids. So we kicked him
24 off the tour, right? Like, for us, it's a fine line, but you can't ramp up the tensions that
25 way.

1 And they were attacking us for being weak and unmasculine and a bunch of fat,
2 gluttonous, like, women, because it's Women for America First who we were organizing
3 under.

4 So they were pushing for a much more violent rhetoric, while what we were
5 pushing for, frankly, was, like, procedural inside the House to, like, "All right, this is our
6 chance to make our case, like, to the world. Let's make sure that, like, we put our best
7 face on this thing."

8 Q So, if I had to characterize this -- you tell me if this is a fair characterization of
9 what you've explained -- the concern about the association with Ali Alexander and Alex
10 Jones and Roger Stone stemmed, at least in part, from the fact that these were folks who
11 were ramping up the tensions in a way that might lead to violence.

12 A Absolutely.

13 Q And those communications or concerns were relayed to Mark Meadows by
14 Amy Kremer?

15 A Amy Kremer. And I believe it was more than Mark Meadows, right? I
16 don't -- she said "the White House and the" -- so we had this conversation in the back of
17 the bus that I recall vividly, because, like, I was fed up with the whole thing at this point,
18 and so was Amy. And Kylie was kind of representing us, and we -- there was lots of
19 tension between Amy and I and Kylie about, like, what kind of feedback we were getting.
20 And we literally just made the decision, like, full-court press, everybody we know who
21 could have influence over this, to put an end to it.

22 Because -- for all of these reasons. It's a bad look. It's bad, optically, to have
23 people who are running around saying the things they're saying. It's dangerous
24 logistically, because they aren't running the same level of secure, right? We haven't
25 seen the same -- seen any evidence that they have the capability of pulling off, logistically,

1 a project of that magnitude. So, when you combine that with their violent rhetoric,
2 that's a -- that's a dangerous situation.

3 Q And you also said, from your experience traveling the country, you knew
4 tensions were high among the President's supporters. Is that right?

5 A Absolutely. I had been approached several times from people who were,
6 like, "All right, well, when's the revolution starting?" And I've dealt with that as part of
7 the Tea Party movement, right, and I have a very specific, like, program of talking them
8 down. If it reaches too far, I alert law enforcement. But I always direct them to
9 community groups and self-reliance and taking care of, like, immediately there. And I
10 always, frankly, explain to them, like, it's not a winning strategy. Like, this isn't 1776.
11 We're not living in those kinds of times. That is not -- like, frankly, you're just suiciding
12 yourself, is the basic message.

13 But we could tell, like, just by the level of, like, anger when we were, like, going to
14 some of these rallies -- because we could tell that some of what Ali and Alex were putting
15 out regularly was bleeding into some of the crowds that were coming, because they
16 would challenge us on, like, why we weren't being more harsh or why we weren't
17 organizing this or that. And so, yes, we could tell that the pressure cooker was, like,
18 close to capacity.

19 Q So, recognizing all of that, why the appeasement of those folks and allowing
20 them the opportunity to speak on January 5th?

21 A So, against my objections, the conclusion was reached that, because we had
22 this stalemate, that the way to handle it so that the events in D.C. would be focused on
23 the mission and not internal conflict, it was reached that that would be the,
24 quote/unquote, "appeasement."

25 I really didn't like it. Like, we wrestled with actually just completely pulling the

1 permits or even setting up a separate stage on January 5th. Like, Pastor Gibson had
2 worked out with the Parks Department that we could even split Freedom Plaza if we had
3 to, because we really wrestled hard with that, whether we wanted to -- frankly, being at
4 same stage with those kind of people did not seem like good optics or something that we
5 wanted to do.

6 The argument that was made and relayed to us was that, if you don't, then on
7 January 6th all it's going to be is, like, them running around fighting everybody, causing
8 problems. So this is the way that we give them enough so that it's not -- that they don't
9 cause trouble on January 6th.

10 Q So who, if you know, kind of forced that appeasement compromise through?

11 A I'm not sure who forced it through. I know that it -- where it was relayed to
12 me and where I was asked to kind of jump in and manage it was from Kylie Kremer and
13 Katrina Pierson.

14 Q Okay.

15 I think that's a good stopping point.

16

BY [REDACTED]

17 Q Can I just ask -- quick followup question from earlier. I think you
18 mentioned someone named Nick Funes. Is that right?

19 A Jason Funes.

20 Q Jason Funes, excuse me. Who is he?

21 A So Jason Funes worked as -- doing advance work on the bus tour and some
22 of the D.C. rally stuff for us.

23 He was a -- he was a little unhinged, right, and had, like, a -- he would dive into
24 some of the, like, crazier conspiracy stuff and just kind of seemed all over the place. But
25 he had worked for the Department of Interior under Ryan Zinke. And I only met him the

1 night before the November rally, and he was wearing the Trump team jacket and was
2 introduced to me as a member of the campaign's advance team until just recently.

3 And so we used him for advance, although we -- I continued to take
4 responsibility -- more and more responsibility away from him the longer I worked with
5 him, because he seemed -- it seemed like he was -- suffered a little bit of mental illness
6 stuff.

7 Q And for Ali Alexander, was it your impression that he was working with
8 General Flynn with respect to any of these rallies or just taking Mr. Flynn's money?

9 A So this is a little -- it's kind of a challenging question, because I've learned a
10 lot, even in recent days, that has surprised me considerably.

11 My assumption was that everything Ali was saying was bullshit, frankly. Like, it
12 didn't surprise me that he was talking to some Members of Congress, but the idea that he
13 really was working with the -- just seemed laughable. Like, it was inconceivable to me
14 that that would -- that a guy like that would actually be working with the White House on
15 anything. Like, there's a great solemnity to the White House, and the people who work
16 there -- and they kind of have a responsibility to live up to that. And so, to me, the idea
17 that Ali was doing anything but blustering on that was inconceivable.

18 So, since, I think as things have come out post- that there has -- like, I've come to
19 find some things. I didn't think General Flynn -- the one place I had a concern is that
20 when I saw Gen- -- the encounters I had with General Flynn, he seemed to be surrounded
21 by, like, the same group of Oath Keepers, with Stewart Rhodes, that Ali was kind of
22 floating around with. But I kind of assumed that they were just doing that because they
23 were cheap.

24 But it was not -- I did not think -- I thought that -- well, not because -- I remember
25 we had -- and I believe we talked to General Flynn about why he was planning to speak at

1 Ali's event that was in conjunction with the Jericho March in December, and our
2 takeaway was that he was just kind of -- he didn't know how to navigate the different
3 political groups or whatever.

4 So, yeah, we weren't real sure whether he was directly working to -- or not. But I
5 do remember it stuck out to me that, when I would encounter General Flynn, it was the
6 same guys, like, the same volunteer guys that, like, tac'ed up, who, like, did the
7 shoulder-on-hand thing as they moved through the crowd, that I also saw with Alex Jones
8 and Ali.

9 Q And was it -- did you understand, from talking to General Flynn or other
10 conversations, that General Flynn had paid money to Ali Alexander to get on the stage --

11 A I was not --

12 Q -- for the December rally?

13 A I think I may have heard from Patrick Byrne that that was the case. I do
14 remember hearing that Ali was charging -- like, if you wanted to speak on Ali's stages, like,
15 right, he wanted money from you. Because I remember just thinking, like, how odd that
16 seemed to me and how pathetic that people would pay to get on that kind of stage.

17 But there were, frankly, so many instances of people coming to us being like,
18 "Yeah, we gave this guy Ali money, and things weren't delivered."

19 And, with the general public and the media, while we were being -- while we
20 took -- differentiating between Stop the Steal, roughly, which is kind of what Ali was
21 organizing under, and March for Trump, which is what we were organizing under, while
22 we took that differentiation very seriously, I don't think that the public or the media really
23 understood, like, the internal dynamic there, and so there was kind of a general sense
24 that, like, we're all one.

25 And so, when Ali would burn somebody -- like, Alice Butler-Short, the example,

1 one of -- and Alex Jones are the two examples that really stand out to me. Alice
2 Butler-Short, I mean, she broke down in tears with me that morning of December 12th,
3 because she had called in all her favors to have General Flynn there and to have Members
4 of Congress and her friend with a beautiful voice who was going to sing to everybody,
5 right? Like, she had really passionately put something together and felt devastated that,
6 when she got there, there was no stage set up, right? It wasn't put together. And
7 that -- right? But then I had to cut short their program so that it didn't prevent those
8 people from seeing the program that we'd worked so hard to put together at Freedom
9 Plaza.

10 Q For Ali Alexander, Alex Johnson, and Roger Stone, I believe you mentioned
11 they were ratcheting up the rhetoric, and your group did not agree with that.

12 Did you have any understanding that they, the three of them, were taking any sort
13 of direction from either the White House or the Trump campaign about the type of
14 rhetoric they should be using?

15 A Well, so we had -- in the Periscopes, right, they were claiming, oh, we just
16 talked to the White House, President Trump is on board with this and that. And, frankly,
17 like, we did not find it credible. Now, like, since, it does seem like maybe they were
18 communicating with -- maybe even more than we were.

1 [12:04 p.m.]

2

BY 

3

Q And why do you say that?

4

5

A My takeaway from the media coverage after Ali's deposition last week and the subpoenas that followed the next day, I think that Ali was actually being far more at -- my guess is that he produced -- my assumption is that he produced receipts that show that he actually was in communication with who, I guess, would be probably Dan Scavino and some others at the White House.

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Again, I'm just guessing, based on what I've put together, but having watched their reactions since, and what they've talked about publicly since, I've actually come to think that I was wrong and actually they had better access to the White House than we did.

13

14

Q And you mentioned Dan Scavino. Why do you think it's possible that like Mr. Alexander could've been talking to Dan Scavino?

15

16

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18

19

A I can't remember specifically why, and it may be in the text messages with me and Amy, or me, Amy in one of the threads that included Amy and I. I remember there was one point where we theorized, or we talked about it, because we had seen Scavino post something after Ali that like mirrored -- like the talking points mirrored each other. And I remember, I was thinking, like, What the hell is this?

20

21

Q And was this message, to the best of your recollection, something that concerned the 2020 election, or just something like completely random?

22

23

24

25

A I think it was -- it was definitely around either the election or one of the events or, right, the -- maybe even January 6th. I just remember specifically that Scavino put something out that led us to think, like, is he really endorsing like what Ali is doing here?

1 And it was subtle, like it wasn't overt, but it just happened that like we had
2 watched what Ali had done his Periscope right before, and it seemed like Scavino
3 mirrored that message, like right afterwards. And so it became, well, maybe that's one
4 of the people.

5 And then when I spoke with -- I spoke to -- I worked at Breitbart for -- both Jen
6 and I worked for Bannon at Breitbart leading up to the 2016 election. When I spoke to
7 Matt Boyle about that article that, right, it's not realistic that we're going to see Joe Biden
8 at all in this thing, right, very expressly in the first paragraph.

9 When I called Boyle about that, because it had listed January 6th speakers to
10 include Alex Jones, Ali Alexander, and Roger Stone. And I remember calling him and
11 being like, dude, listen, I'm engaged in the -- like, right, I'm on the bus. You see me at all
12 the rallies. I can tell you, those people are not -- they don't have any role on
13 January 6th.

14 And I remember him, he wouldn't -- he wouldn't tell me who, but he said, that
15 came directly from a source at the White House. And when I theorized who that could
16 be, it really -- to me, it really boiled down to Donald Trump, Jr., Dan Scavino.

17 Q And had you interacted with Don, Jr., in the context of the 2020 election?

18 A No, I -- no, I had not, no.

19 Q In terms of the rhetoric that you said, Alex Jones, Ali Alexander, and Roger
20 Stone, that you said you didn't agree with and was ratcheting up, would you include Steve
21 Bannon's rhetoric in that category too?

22 A So to a degree. Like so, I thought -- my thought when I heard Steve say the
23 heads on pikes thing, I theorized that he was purposely -- that he had come to the
24 conclusion that the effort to, right, that Joe Biden was going to be the President and that
25 he ramped up the rhetoric to do that to take himself off the field, if you will, like in a way

1 that he didn't have to concede or appease.

2 Now, that's just based on my own assumptions, but it seemed out of character a
3 little bit for Steve to cross the line like that. And he's not somebody who I've ever
4 known to make mistakes like that, right, that -- I thought that it was intentional. And
5 what I thought was is that it was a strategic play to take himself like out of the broader
6 argument so that when Joe Biden was inaugurated to be the President, it allowed him
7 basically just the take himself off the field.

8

BY [REDACTED]

9 Q But to be clear, you didn't have any conversations with Steve Bannon during
10 this time?

11 A No, no. That's completely assumption based on my part.

12

BY [REDACTED]

13 Q I want to go back a little bit towards the beginning of our conversation just
14 to clarify. You mentioned you and Amy and there was others making these calls to
15 Members of Congress, seems like primarily Senators, about putting up the pressure for
16 the objections that were going to take place on January 6th. Who else was a part of
17 those conversations, or would have had knowledge about those conversations?

18 A James Lyle, Amy Kremer's long-term partner, would often be a part of that
19 group. Probably Matt Couch to a lesser extent, not that he would sit in on them, but he
20 also has like a broad network of elected officials that -- so we would talk about who
21 would be reaching out to who in that instance.

22 I think Kylie was still on board. I'd probably point to Scott Johnston and Matt
23 McClesky because they were primarily the drivers and in the car with Amy and Kylie when
24 they were doing many of the calls. And maybe Keri Morgan, who is a sweetheart, and I
25 really hope doesn't get too sucked into all this, because like we literally -- she just reached

1 out to us, and we were like, yeah, come help and -- but she may be somebody else
2 who -- right, she was kind of working as a personal assistant to all of us, so starting -- I
3 think I picked her up at the Iowa event in Des Moines for the Iowa event. Yeah, that's
4 right.

5 And generally other people like who were on the bus tour, maybe Jeff Rainforth,
6 who was our video photographer, videographer. Who else was -- lots of people were
7 coming on and off the bus, but most of those people, at some point or another, were
8 likely engaged and were, like, Hey, does anybody know or have a connection to this
9 person, and somebody would or they wouldn't or, right.

10 So there was definitely discussion amongst the more broad group about how to
11 get to, like, Senator Kennedy, for example, like does anyone have a direct connection,
12 those kind of conversations. So that might be a way to confirm what we were talking
13 about there.

14 Q And Ms. Lawrence as well?

15 A Yes, absolutely.

16 Q And did you all have any sort of like spreadsheet or document where you
17 were kind of tracking who you were contacting or who was assigned to contact whom?

18 A I don't think so. There may have been, but I know both Amy and I tend to
19 kind of operate this stuff from memory.

20 Q And were you aware of any parallel efforts that were being conducted by the
21 White House or the Trump campaign similarly to Members of Congress or State
22 legislators during this time period?

23 A I do remember occasionally hearing back from people like that -- the Trump
24 team, and I don't know whether to distinguish White House or campaign. But the
25 Trump team had also been in touch recently, right, like that sometimes we would reach

1 out to somebody and we'd hear stuff like that. So we -- there was a sense that there
2 was a parallel organizing effort going on, and that we were trying to make sure that we
3 were running congruently.

4 Q But you weren't directly coordinating with one another in terms of, like,
5 strategy, who to contact and when?

6 A Well, we did have the sense that Amy was acting as like the liaison there,
7 that Amy -- Amy and Kylie were in regular contact to make sure that we weren't doing
8 anything that was in opposition to what they were doing.

9 Q And "they" being the Trump campaign or White House or Trump team?

10 A Yeah, Trump world, if you will.

11 Q And is it fair to say that the members -- where you were directing your
12 efforts, it was where at least the media had called Joe Biden to be the winner of that
13 State?

14 A Yeah, I think so.

15 Q Okay.

16 A I mean --

17 Q The battleground States that you referenced earlier?

18 A Yeah, like Wisconsin, Nevada, Arizona. I don't remember when in the
19 process, right. I remember some of them were very delayed, like as far as like the
20 official call. I remember some media outlets were calling some and some media outlets
21 weren't calling them, and, right, there was contention that way. So I'm -- it's hard for
22 me to be specific, but there were definitely some States that the media had called that
23 we were still looking into and that we still wanted to look into.

24 Q Were you calling in, let's say, States like Arkansas or Texas where it was, I
25 think, resoundingly like a State that Trump had won and they were not contesting?

1 A Yeah, there was some degree of that. Like we had -- so one of my best
2 teams, like one -- so when you do these bus tours, it's not possible to like micromanage
3 what happens when you get there, like it's just not feasible from the back of a bus with
4 spotty connection, driving down the highway, stopping at Love's every once in a while.

5 One of my best teams was the Iowa team. I love those guys, right, like really
6 super organized, put together. And I remember us specifically saying, Well, you know,
7 like we need to make sure that we're looking for these kind of issues. Very specifically
8 for us was around the mail-in ballot, like last-minute mail-in ballot changes due to COVID
9 emergency, right. And I do remember specifically in Iowa and Texas encouraging them
10 to look in their own State even though they had been called for President Trump.

11 Q Okay. So you do recall looking into some places where Trump had won,
12 but there were mail-in ballots?

13 A Yeah, basically the -- we thought that the opportunity to get access to the
14 information and audits would likely be easier in a place that is -- that had overwhelming
15 control by Republicans. And so, there was discussion of maybe that's the place, like,
16 maybe some of those places are the place that we can get in and get a foothold on what
17 to look for in these other places.

18 Q But in terms of your calls for like the objection purposes, were you looking in
19 States that --

20 A No.

21 Q -- Trump had won --

22 A No, those were all Biden States.

23 Q Okay. So but --

24 A And there were -- there ended up being, I believe, eight with a potential for
25 nine.

1 Q But when you were looking for, maybe, instances of potential fraud and how
2 to go about looking into how fraud could've occurred, you did look at Trump -- at places
3 he won --

4 A We --

5 Court Reporter. One at a time.

6 The Witness. Oh, sorry.

7

BY [REDACTED]

8 Q You looked at areas or locals that Trump had won because you thought it
9 might be easier to access information and learn the process?

10 A Well, we didn't look for those places necessarily to object, right. We
11 weren't looking to object in States that Trump won, right, because we wanted Trump to
12 win, like, frankly. And we prioritized States where Biden had won by a narrow margin.

13 Q Thank you for clarifying. Do you recall any phone calls to governors or
14 Secretaries of State?

15 A No. Like I assume we probably did. I actually wouldn't be surprised to
16 find out that one of them spoke at like Michigan or something, right, like that we had
17 some Secretary of State even maybe come speak. I don't remember that ever being an
18 emphasis at all.

19 Q What about any, like, poll workers for any -- in any States?

20 A Yeah, we did speak to several poll workers, especially those who had given
21 sworn affidavits in different places. The lady who got lampooned on Saturday Night Live
22 in Michigan, Mellissa, I think, Mellissa Carone, I remember speaking to her. I think
23 James Lyle was the one who had made initial contact with her. I think Matt Seely was
24 an election worker, like a poll worker.

25 I know we had some people in Georgia who came on stage and spoke about what

1 they had witnessed, and that they were willing to sign sworn affidavits to. So that there
2 definitely was a -- an emphasis on the people making allegations, but not necessarily -- I
3 think kind of -- I've heard a similar line of questioning about this stuff in regards to
4 organizing efforts since to elect and install election officials in some of these positions.
5 And to that regard, I think all of that started post like all January 6th and January 20th.

6 Q So your -- from what you recall or what you were involved with, the
7 conversations with poll workers, it was just to the extent that they had submitted sworn
8 affidavit or had talked publicly about instances of fraud that they thought that they had
9 believed?

10 A Correct.

11 Q And for the, like, the sworn affidavits, were those things -- affidavits you
12 obtained or they had already been prepared?

13 A Primarily, they'd been submitted to Sidney Powell or Lin Wood. I
14 remember them specifically, like she submitted her -- I remember reading through her
15 submission and it was like hundreds of pages long with, right, lots of different things.
16 And I remember -- I remember it specifically, because we disagreed on some of the tactics
17 in that some of what was included there had come from people that we had kind of
18 deemed when we evaluated them to be less credible.

19 Q So did you say you disagreed on tactics with Sidney Powell, Lin Wood?

20 A Yeah, so when we saw what they were doing publicly and presenting
21 publicly, and I read through the hundreds of pages of what they had submitted to the
22 court, I remember thinking that it had -- it was a mistake to include some of the people
23 that they included, because we'd met them at the stop. I think in several instances we
24 hadn't even allowed them to speak on the stage because we found them that un-credible.

25

BY [REDACTED]

1 Q If -- with respect to these election observers, witnesses, et cetera, I think
2 that the question is, to what extent were you involved in identifying people who could
3 provide that kind of information, separate from just noticing these are people who have
4 already kind of been made publicly aware, and then involving them in your rallies?

5 A Yeah. So there was no kind of outreach campaign to be like, Hey, if you're
6 a poll worker who witnessed something funky, reach out to this email or phone number
7 or whatever. For us, we were consuming all of the information that was being put out in
8 these individual places, and because our networks are very deep and were growing in
9 these, quote/unquote, "battleground States," right, we were able -- we were seeing that
10 information come in raw and then kind of making our own evaluations about it and then
11 trying to -- and then we would provide a platform if we could to what we found to be
12 more compelling.

13

BY [REDACTED]

14 Q For the phone calls that you've testified about to Members of Congress, and
15 also State legislators, did those just occur in December or do you recall if any happened in
16 November?

17 A So most -- all the way through. So, I mean, most of -- before December
18 was more logistical about who would appear at what rallies, and if we could get so-and-so
19 to come speak or not. The kind of strategic organizing didn't start until after the
20 December rally.

21 Q And that happened after you had a conversation with the chief of staff for
22 Representative Gosar, is that right?

23 A Nick Dyer was the one who really kicked that process off.

24

BY [REDACTED]

25 Q Wait, Representative Greene?

1 A Yes, correct.

2 BY [REDACTED]

3 Q Excuse me, Representative Greene. Apologize.

4 A No worries.

5 Q I misspoke.

6 A It gets -- there's a lot to process.

7 Q I think it's a good time for a break?

8 [REDACTED] Yeah, why don't we -- this is a good time for us to take a break, so
9 we'll go off the record.

1 [1:24 p.m.]

2

BY [REDACTED]

3

Q We're back on the record for the deposition of Dustin Stockton on

4

December 14th.

5

Mr. Stockton, after we've sort of covered in a lot of general but then some detail,

6

previously in big-picture sort of perspective, I'd like to kind of go back and drill in on a

7

couple of specific details sort of starting from the beginning of the scope of what we're

8

looking at.

9

First, it's correct that your involvement with January 6th started with your

10

association with the Kremers. Is that right?

11

A That is correct.

12

Q So how did you first come to be associated with Amy and Kylie Kremer?

13

A I first was associated with Amy Kremer as part of Tea Party Express in 2009,

14

2010.

15

Q Okay. If you flip to exhibit 6 in the binder, this was a text thread that you

16

produced with the title, "M4T Core Team," and the text thread starts in July of 2020.

17

Were you working with the Kremers in July of 2020?

18

A Yes.

19

Q So this is all preelection. So what, in your own words, were you doing with

20

the Kremers at that time?

21

A So, I believe that this text thread was renamed, like we purposed as part of

22

the tour. It wasn't originally M4T Core Team. During this time, I did -- I was a

23

consultant for Women for America First doing digital advertising and then just, in general,

24

like coordinating our political activism.

25

Q So safe to say that the work in the summer of 2020 didn't focus on election

1 integrity issues?

2 A No, not at all.

3 Q If you flip to page 7, there's a conversation here about a lawsuit over the
4 Black Lives Matter mural. Could you tell us what that was about?

5 A So the Kremers, through attorney Mike Yoder and Ron Coleman, had filed a
6 lawsuit against Bill DeBlazio and the city of New York for -- to be able to place a Women
7 for Trump mural of the same font, size, and lettering that was equal to the Black Lives
8 Matter.

9 Q And were you trying to help spread the message on that, or what was your
10 connection to that project?

11 A Helping fundraise for it.

12 Q And on page 7, you sent a text to this group saying, "I've got to raise money
13 by the end of the month or face some tough choices." What was that in reference to?

14 A I would -- so this was probably in relation to needing to raise money to cover
15 my expense -- my fundraising expenses, so my database management, my bulk email
16 service provider. My assumption is it's something to do with that.

17 Q Okay. So that raises the question for me, what was your financial
18 arrangement with the Kremers during this time period?

19 A I worked on a commission basis, so I would set up the fundraising apparatus,
20 and use my donor database to raise money for their various projects.

21 Q Do you remember what kind of commission you were making on the
22 donations?

23 A It often varied depending on what the project was, but anywhere from, I
24 believe, 10 percent to 50 percent, depending on which project it was.

25 Q Now, if you flip ahead to page 20 of exhibit 6, in the middle of the page, we

1 can see that there's, on this thread, no communications shown between October 27th
2 and November 4th, which is right -- which is the day after the election. So let me start
3 by asking you, what were you doing in a professional capacity around Election Day 2020?

4 A Almost nothing. So the We Build the Wall raid had made us completely
5 radioactive. We were forced to cancel. We had outfitted our RV into a mobile
6 production studio, and were planning to travel the country doing events and interviews
7 with candidates that we were supporting. The raid had made that untenable. It had
8 also prevented us from doing the normal campaign activity we would do, which would
9 include fundraising and media appearances and just general consulting. So
10 the -- leading up to the election, we were just kind of holed up.

11 Q So the first text that you send after the election is on November 4th. You
12 send to the group, "Pete Sessions is in." What is that referring to?

13 A I can't recall exact -- so I have a personal relationship with his chief of staff,
14 Kirk Bell. My guess is it was in regards to speaker lineup around the -- I can't remember
15 exactly what we were -- what the ask was, but I definitely reached out to Kirk as one of
16 the people I'd reached out to, because we -- we thought that a less firebrand member like
17 Pete Sessions would be ideal for, I can't remember exactly what we were doing.

18 Q So speaker event or a speaker lineup for what in particular?

19 A I can't remember if it -- this was the day after the election, then I -- then the
20 November rally on the 14th would be my guess.

21 Q And is that the same thing, a couple lines down you say, "We have Gosar in
22 on AZ." Is that also in reference to having him as a speaker at a rally in November?

23 A I assume, yes.

24 Q Then the very next message, it bridges from page 20 to 21 appears, to be a
25 tweet from Ali Alexander that's encouraging -- it says, "If you can be in D.C. tomorrow and

1 want to make a difference, please let me know by replying here. Do not fly in. Only if
2 you're local."

3 And then it goes on to say, "@EagleEdMartin @KylieJaneKremer @AmyKremer
4 running point on D.C. noon event tomorrow." So that's on November 4th. Do you
5 know what that was in reference to?

6 A I don't recall exactly. I remember that there had been discussion in the
7 immediate aftermath about putting, like, a large coalition together of activists and
8 influencers that when Amy approached us about participating, that was kind of part of
9 the pitch.

10 Q So that leads me to probably the most important question for this time
11 period is, what was the ask from Amy Kremer and Women for America First in the -- in
12 these immediate days after the election?

13 A Putting together a rally in D.C. in November -- like as soon as we could in
14 November.

15 Q If we go forward a couple of pages here, on page 23, there's a long block of
16 text that I won't read, but it says, "As one of your constituents, I am writing you today
17 about a matter of the utmost importance and urgency," and that text bridges on to the
18 next page. What is that text that you have sent to the group?

19 A That is my draft text of the Rally Congress letter that we were encouraging
20 people to send to the Members of Congress.

21 Q And you, I think, alluded to this earlier this morning, but could you tell us,
22 you know --

23 A What it is?

24 Q Yeah, what is Rally Congress?

25 A Well, so -- well, what it was -- unfortunately, they decided to shut down right

1 after. This was the last campaign they ever did. It was a software subscription
2 program that connected -- so people would put in their ZIP Code and the other relevant
3 information necessary to get through the Capitol messaging system.

4 So like, for example, some Members require exact addresses and phone numbers,
5 some don't. They would automate that process so that whoever it was would have to
6 fill out those specific forms. And then it would send -- there would be a sample letter,
7 which this was the draft of, that they could modify how they wanted, but would then
8 allow them to send a digital message to their specific Member of Congress.

9 Q And so, is that a piece of software that you developed or you were the
10 owner of? What was the professional --

11 A They were a vender of mine.

12 Q Okay. So this text here is a draft of what would have been information that
13 citizens could put in to Rally Congress to notify the applicable members?

14 A Correct. This would be the sample, quote/unquote, "sample letter" that
15 was provided after they got through the engagement portal, like where they enter in their
16 personal information so we know which Member of Congress to connect them to. This
17 would be the letter that is prepopulated. Ninety percent don't make any modifications.

18 Q And so, is the text already a part of a campaign that people can join in Rally
19 Congress, or is it set up so that it's just a blank form, and otherwise you're providing this
20 for people to paste into the software?

21 A Well, so -- no, so it comes prepopulated. So when you -- once you get
22 through the engagement portal, it pulls up the sample letter, and I would tailor these
23 campaigns to whatever we were working on. Our most effective one of all time was the
24 Postal Reform Act that we coordinated with Congressman Issa on. We sent nearly
25 400,000 individual messages on that, and were able to pass -- actually used it to push

1 across legislation that streamlined and cut the deficit from, I believe, \$15 billion annually
2 down to like \$6 billion annually.

3 Q Okay. Let me point you to exhibit 4. This is a text thread that you
4 produced to us, I believe it's between you and Cindy Chafian. On page one of exhibit 4,
5 the date is November 6th, and you ask Cindy, "What can I do to help you recruit State
6 coordinators?" What is that in reference to?

7 A I believe, initially, our plan was to do individual groups in each State. And I
8 think Amy had directed me to Cindy as like taking the lead on that, although I think it got
9 dropped. Like I don't think it ever materialized into an actual program.

10 Q And so when you say individual groups, was that individual groups that were
11 focused on the election?

12 A My guess is -- yes. And my guess is that it was, I believe, I'm not sure, but I
13 think maybe she had set up 50 separate Facebook groups or pages tailored to each State
14 to try to manage all these people who were reaching out to us, and try to organize them.

15 Q Okay. And to be clear, organizing around issues of election fraud following
16 the presidential election?

17 A Yes.

18 Q On page 5 of this exhibit, exhibit 4, I think in here there's a conversation
19 where you are referring to Rally Congress. You write -- there's a conversation it seems
20 about Cindy trying to push for State and local leaders, but being concerned about not
21 having enough in total. You end up saying to her regarding Rally Congress data, "Please
22 keep it secure. The only deal I have is with Amy, and I don't trust any of the people
23 attaching themselves." Can you explain what you meant by that?

24 A Yeah, so in my professional capacity, data is everything. The relationship to
25 donors and activists who will actually take the time to reach out to a Member of Congress

1 is sacrosanct.

2 At this point in the process, it was the broad coalition that included Ali as kind of,
3 like, the leader of this other group of influencers. And my experiences with Ali in the
4 past led me to believe that I did not want him having access to data that I was collecting.

5 Q What experiences did you have previously that led you to that concern?

6 A We've existed in the same space. He used to hold Blog Bash at CPAC every
7 year. He -- I would see his activist campaigns, I believe him and -- who is the crazy guy
8 and the lawyer that we talked about --

9 Mr. Nass. Lin Wood and Sidney Powell.

10 The Witness. No, no, Burk -- Burkman. Jacob Wall.

11 Mr. Nass. Oh, Jacob Wall and Jack Burkman.

12 The Witness. Right.

13 Mr. Nass. They actually -- they were here with Ali. I know I'm not sworn, but
14 I'm just -- last week when he was here.

15 The Witness. Oh, my goodness.

16 Mr. Nass. I don't know if you're aware of it.

17 The Witness. I was not.

18 Mr. Nass. No. All right.

19 The Witness. I'm sorry. But I had concerns from the very beginning about
20 working with him just because I knew them not to be honest brokers in all cases.

21 [REDACTED] Okay. So before we move to specifics for November planning, do
22 you have any questions about --

23 BY [REDACTED]

24 Q Yeah, just real quick. If we could go back to exhibit 6, which we were just
25 looking at, I just have couple questions. If you go to page 20, which we were just at.

1 Mr. Nass. Yes, we were.

2 BY [REDACTED]

3 Q So on November 4, 2020, I believe that's you. You sent a link to
4 Mission.Substack.com. Is that your website?

5 A Yes, it is.

6 Q Okay. So my question is just, you know, by the title of this, it says, "Last
7 chance, Americans: Fight on your feet or die on your knees." And, you know, before
8 our lunch break we were talking about rhetoric and, you know, violent rhetoric --

9 Mr. Nass. Can I just -- can we have a break for a few minutes just to go talk?

10 [REDACTED] Can I at least finish my question?

11 Mr. Nass. Yeah, finish your question, absolutely.

12 [REDACTED] So my question is just how, you know, this article that you sent
13 on November 4th squares with our discussion about rhetoric that you agreed with and
14 disagreed with following the election of 2020.

15 [Discussion off the record.]

16 The Witness. I'd rather I answer.

17 BY [REDACTED]

18 Q I'm just asking for you, you know, you sent an article, a link to your article,
19 and we can see the title of it.

20 A Sure. It meant -- well, I will say that my emotions at that point were also
21 much higher, and I have also found that the rhetoric used is often necessary in order to
22 bring people to avenues that are productive and helpful. Political hyperbole, I think, is a
23 universally used tool. And at this point, my own personal emotions were very high.

24 And despite this rhetoric, I believe this article, I'd have to double-check, but I know
25 very shortly after this article it starts steering people to making contacts to their

1 Members of Congress and to other productive actions. And, so, I would say that my
2 rhetoric at that point, the emotions were higher. I also didn't have a complete feel for,
3 like, what this would turn into at the time, and would subsequently tone down the
4 rhetoric kind of as we went along.

5 Q Did you find that you received like more engagement using, like, stronger,
6 more vivid language?

7 A Yes.

8 Q Okay. And I'll note, this was the day after the election?

9 A Correct.

10 Q November 4th?

11 A Yep.

12 Q Another question I just wanted to clarify, I believe you mentioned that this
13 text chain eventually became M4T Core Team. It might not have been originally named
14 that, that name. What does M4T stand for?

15 A March For Trump.

16 Q And who was part of that chat to the best of your recollection?

17 A I could pull it up if -- it would be the easiest way to do it.

18 Q Yeah, if you could just tell us, we -- I mean, we can see who actively
19 participated in the chain.

20 Mr. Nass. Well, he has it and he's happy to provide it.

21 BY [REDACTED]

22 Q Yeah, just who was part of it. Maybe not everyone participated.

23 A Oh, I might actually have to pull it on my computer.

24 Q If not, we can always ask your attorney afterward if you wanted to give the
25 names. That's fine as well.

1 A Yeah, I'd have to pull it for you.

2 Q That's fine. We can discuss later, just the names is fine.

3 Mr. Nass. Happy to provide it to you. There's no objection.

4 [REDACTED] Great. Thank you.

5

BY [REDACTED]

6 Q So, what was your role, in particular, in planning the November 14th event
7 at Freedom Plaza?

8 A Primarily in marketing, fundraising, and organizationally, like, from a
9 leadership standpoint.

10 Q So where did the money come from to pay for the November 14th event?

11 A I would have to go get the exact numbers, but my specialty in this area is
12 grassroots contributions, usually between \$40 and \$60. And I believe we raised, I'd
13 have to double-check, but in the several hundreds of thousands of dollars, like in that
14 kind of grassroots range.

15 Q But the funding was paid directly by Women for America First?

16 A Yes, so Women for America First was the recipient of the, like, fundraising
17 we were doing, and then both them and Stockton Strategies paid for separate parts of the
18 bills.

19 Q And what is Stockton Strategies?

20 A That's my consulting firm.

21 Q Were there other donors beyond the \$40 to \$60 mark sort of with, you
22 know, big name, big dollar amount sort of contributions for this time period from Women
23 for America First?

24 A Not to my knowledge at that point. The first time that, and to my
25 knowledge, to the only one that I was included in, I'm learning things all the time

1 afterwards, but my understanding, the first and really only real large contribution we
2 received was from Mike Lindell. After the November 14th rally, Kylie Kremer and I had
3 a -- had several discussions with him where he agreed to spend and contribute \$250,000
4 to cover the first bus tour.

5 Q And that was subsequent to the November 14th rally?

6 A That was after the -- I believe we first broached it with him the night after or
7 the morning the next day.

8 Q If you could go back to exhibit 4, which is the text conversation with Cindy
9 Chafian, to page 8. And I want to ask you about security for the November 14th event,
10 which if you look at page 8, it looks like there's a back and forth about where to find
11 security. In your own words, what, if anything, were the security concerns for
12 November 14th?

13 A Well, so in any instance, right, you need to have security to handle what was
14 coming. We had no idea how many people were coming. The short time period from
15 the election to the rally led us to believe that it would not be that big of a turnaround, like
16 we definitely weren't expecting as many people who showed up.

17 And I think this text thread kind of gets into what would become an ongoing thing
18 between Cindy and I, in that my experiences -- when I do rallies and have done rallies
19 around the country, we almost always go to the sheriff's office first to hire off-duty police
20 officers and look for licensed and insured firms to handle security.

21 And it's -- like when you build a house, I'm happy to do all kinds of handiwork, but
22 I won't touch electric, because there's some things that you leave to the professionals,
23 and security is one of those things. And so I -- yeah, you can see she offers -- so the
24 normal firms and guys I use were all unavailable, so you can see where I say, I'm having
25 trouble with security. All of my guys are already booked. She comes back with, I can

1 ask the volunteer guys, and I say, I'll keep chasing stuff down. Like I kind of pass that off
2 like I don't want volunteer guys, like I want pros.

3 Q At the very top of this page, you sent her a picture. Do you know what
4 that's a picture of?

5 A Yeah, so I'm actually really proud of that. So when COVID hit, my dad and I
6 were really concerned about hospitals being overrun. My dad is a career paramedic
7 firefighter, and so, he and I put our heads together and we put together a really
8 high-speed, first-aid kit to hand out to our friends and family in case they couldn't go to
9 the hospital that would cover like 95 percent of the stuff most people would visit the
10 emergency room in case the hospitals were overrun. And we actually -- I believe we
11 produced -- the first run that we did was like 4- or 500 of them.

12 Q So that's just a first-aid kit?

13 A Correct.

14 Q It doesn't have anything specifically to do with the November rally?

15 A No, it's just a really kick-ass first-aid kit.

16 Q When Cindy Chafian refers to the volunteer group, do you know what group
17 she's talking about?

18 A I didn't at that point; I now know that she was referring to the 1st
19 Amendment Praetorian.

20 Q And do you know what her connection to the 1st Amendment Praetorian
21 was?

22 A I believe it was through her husband, Scott Chafian.

23 Q On the next page here, at the top of page 9, you know, after you say, I have a
24 licensed firm, will provide us some liability protection. Then you say, I will say with an
25 emoji at the end, I have an armed crew of 3K guys with 2K AR-15s right over the

1 Virginia -- PA border if any things got really sticky. What's that comment about?

2 A So both Jennifer and I worked for Gun Owners of America for a long time,
3 and it was frankly like braggadocios fluff about knowing a bunch of the patriot groups in
4 Virginia in case, you know -- especially with Cindy and Jason Funes, there was over the
5 top talk about like, Well, what if they come in and start shooting and stuff. So that was
6 kind of my overly braggadocios like, Oh, I know the people in Virginia we could call over if
7 things got sticky.

8 Q Right. And I'm just not familiar with some of the shorthand that you might
9 be using. When you say 3K guys with 2K AR-15s, is that -- what does that mean?

10 A Like the groups -- I mean, the numbers kind of pulled out of thin air, but like
11 Gun Owners of America is headquartered in Virginia. And, so, like I know a bunch of
12 guys with a bunch of guns that we could call if things -- right, if as you're worried about
13 like, you know, the Feds are going to start shooting at us.

14 Q So 3K means 3,000 and 2K means 2,000?

15 A Correct.

16 BY [REDACTED]

17 Q Sorry, real quick. Did you say, was the concern that the Federal
18 government was going to shoot on you?

19 A Correct. Correct. I'm not saying that that was my concern, but I'm saying
20 with some of the other people who were involved, especially surrounding like the 1AP
21 guys, that their frankly paranoias around some of this stuff was often over the top.

22 BY [REDACTED]

23 Q Well, I think that raises an interesting question that I'd be interested in
24 getting your perspective on is, the distinction between what you're getting when you
25 have a licensed professional security firm versus a more volunteer, takes on the look of

1 paramilitary, you described this morning, you know, guys keeping their hands on the
2 shoulder. Why would people want the latter instead of the former?

3 A Well, so the former costs money, right. Those guys are -- good security is
4 not cheap. Volunteer security is free, and so that's part of it. Part of it, and I think this
5 also gets to some of the divide, I think there was a desire amongst some of the more
6 hard-core elements, right, to kind of project that kind of military/paramilitary sense that
7 also was from a PR standpoint, not ideal for the optics that we were trying to get across.

8 Q From your perspective, before we move on, how did the November 14th
9 event turn out?

10 A It was incredible, like vastly more people than we ever anticipated or frankly
11 were prepared for. I think we got really lucky in a lot of instances that things went as
12 well as they did. An example would be -- and this led to -- this is one of the -- kind of the
13 start of many of the things that would progress -- I finished giving my speech from the
14 stage on Freedom Plaza, felt great, like riding high. I was also managing the stage at the
15 Supreme Court.

16 I had actually just rounded up like off the Freedom Plaza in the morning,
17 something like Vietnamese volunteers and driven by them golf cart to the Supreme Court
18 to kind of like watch over our stage. And they were feverishly texting me, like, Oh, there
19 are lots of people here, like lots and lots of people here.

20 And so, I got off stage, and Jen and I began walking towards the stage at the
21 Supreme Court. And when we crested where, like the part -- is it Constitution or
22 Pennsylvania? I can't remember which street. But as you crest and you can kind of
23 see the Capitol or the Supreme Court, whatever that building is, it was
24 shoulder-to-shoulder people for like a solid mile and a half or so.

25 And our initial thought was, Oh, my God, how are we going to get to our stage?

1 And so we literally started having to, like, fight our way through the crowd to try to get to
2 the stage, because I didn't have anybody there to manage it.

3 And on the way there, I ran into one of the lines of guys who like are hands on the
4 shoulders as they kind of moved around and got actually into a shoving match with this
5 group, because I was like trying to break through their line or whatever. And they
6 started pushing, like, right, we got into a verbal altercation, and it turned out to be like
7 Alex Jones' like group around there.

8 Eventually I was able to get through and get to the stage. And at that point, it
9 was my volunteers, and we had set it up -- the speaker lineup at the Supreme Court was
10 like our highest profile speakers, and the Freedom Plaza was, like, the junior varsity, if you
11 will, like the influencers and different people. But like our top draws we had scheduled
12 to be at the Supreme Court.

13 There were so many people there that they were struggling to get, just like we
14 were, to get through the crowd to get to the stage, because we hadn't preset up like a
15 path for people to get through. So by the time I got there and Jen got there, the only
16 other high-profile person was Congressman Gohmert, who had managed to work his way
17 through the crowd to get to the stage.

18 And that same group that I had had a confrontation with before as I was working
19 my way through the crowd actually physically stormed the stage, and Alex Jones was
20 trying to get to the microphone. And I remember them pushing us off the stage,
21 including Congressman Gohmert. And I'll never forget one of them like shoved Louie,
22 and he said, you realize I'm a Member of Congress, like you don't get to put your hands
23 on me, son.

24 And I made the immediate decision, and like a quick deal with Alex that I would
25 allow him to give his speech if they would immediately leave the stage. And at that

1 point I figured, if I don't allow him to speak here, the crowd might just tear me apart at
2 this point, because on the November rally, we didn't really -- so the rules at the
3 Supreme Court, it's not permitted the same way other places are. It's first come-first
4 served, but you're also not allowed to use fencing, right. There's extra rules that made
5 security protocol a little different, that frankly we were not ready for.

6 So he gets up and kind of gives a speech, and we end up having, like, a very odd
7 program where I ramble on -- like I end up speaking for, I think, close to 2 hours total,
8 because -- while we were trying to get the rest of the people in.

1 [2:02 p.m.]

2 The Witness. So that highlight -- so, for the November rally, the overwhelming
3 number of people that we weren't prepared -- in a lot of ways, that things -- I remember
4 saying afterwards, we got really lucky. Because at one point we had seen a large group
5 of counterprotesters who I think the only reason they didn't start a conflict was just the
6 overwhelming numbers that were there.

7 But I remember, when we were debriefing afterwards, telling, like, wow, we got
8 really lucky in a lot of these cases that things went as well as they did.

9

BY [REDACTED]

10 Q You mentioned -- the phrase you had used is, you know, these people are
11 going to tear me apart, in terms of the quick decision. Why did you think that?

12 A The Alex Jones contingent, which was a regular presence in, right, November
13 and December and January, they are very intense. And I didn't have, like, a real security.
14 I had a bunch of little Vietnamese Asian people who had been holding my stage for me.

15 And even the short, like, discussion I had about allowing him to speak briefly
16 under these conditions, I was being yelled at from people in the immediate crowd. And
17 I had had the confrontation with the same people, like, 10 minutes before while I was
18 trying to work my way through the crowd. And so it was clear to me that, like, it would
19 be a bad situation to, like, cut his sound at that point.

20 Q You mentioned seeing, you know, people with their hands on the shoulders.
21 Could you identify them as being a part of a particular volunteer group?

22 A The only person I recognized was Stewart Rhodes, but I did recognize
23 Stewart as part of that group.

24 Q Okay. And so Stewart Rhodes is the leader of the Oath Keepers.

25 A Correct.

1 Q So is it fair to say these folks who were there as part of either in support of
2 or providing some security for Alex Jones were Oath Keepers?

3 A Yes. Well, I can't speak to all of them, but I made the assumption that they
4 were, because where Stewart goes, usually he's got the same group of, like, national Oath
5 Keepers with him.

6 Q Right.

7 [REDACTED] Do you have anything specific on that?

8 BY [REDACTED]

9 Q Was Alex Jones under the impression that he was going to speak on that day,
10 whether or not misguided?

11 A So I didn't find this out till later. So we have -- so that happens at the
12 November rally. In the December rally, the day before, Kylie arrives at the Willard, and
13 Alex confronts her, gets right up in her face, like, spittle, right, telling her -- calling her
14 Miss Piggy and that he is going to take over our stage the next day.

15 This time I was prepared for him, though. So Lyndon and the boys, like, we -- I
16 think we had 15, at least 15 to 20 professional security. We also had some stout
17 volunteers, like, kind of surrounding the immediate area. So, when Alex that time tried
18 to take the stage, we beat him back.

19 And the crowd was chanting, like, "We want Alex." And I remember Amy was
20 like, "Don't do it," but I went and I got the microphone, and I explained, "This guy has
21 done nothing but try to sabotage everything we've been doing. And so what kind of
22 man would I be if I allowed this man, who's done nothing but try to attack us and harm
23 us, to get up and use the stage that we paid for, the sound system that we paid for, the
24 security we provided, to speak? I'm not going to let it happen." And then I let Millie
25 Weaver, who had had a, like, big, public falling-out, like, get on the microphone and kind

1 of taunt him.

2 So that's -- so that confrontation led to him calling me Satanic Santa on his show
3 for a couple -- like, a week. It's on my resume now. I'm kinda proud of it.

4 But, before the January event, January 4th or 5th -- and I've got a picture of
5 this -- I was outside smoking, and I could tell that Alex was lingering and, like, watching
6 me, like, kind of -- like, being courteous to let me finish my phone call. And I didn't
7 really want to talk to him, so, like, I kept talking and talking and talking. And he wasn't
8 going anywhere.

9 And so I -- when I got off the phone, he came over, and he's like, "Hey, Santa!
10 Hey, Santa!" And he apologized profusely. And what he explained was that he had
11 paid a significant, like, six figures -- I believe he used "six figures" -- to Ali in both
12 November and December to set up a stage at the Supreme Court, and he was under the
13 impression that I was denying him access to his own stage, which is why he was acting the
14 way he was.

15 And I took it -- I took that as being sincere from him. And he really did apologize
16 over and over and over again. He explained that he's always been kind of a radio guy,
17 not an event production guy. And he specifically said, like, this Ali guy fucked me over.

18 But then the next -- like, then I saw them palling around again later, so who knows
19 with these guys.

20

BY [REDACTED]

21 Q And just to clarify, both of these, sort of, stage-side confrontations,
22 November and December, are on the stage at the Supreme Court?

23 A Correct.

24 Q Not at the stage at Freedom Plaza?

25 A Not at the stage at Freedom Plaza. And he did not speak in either the

1 November or December rally at the Freedom Plaza event.

2 Q Okay.

3 So then let's go on, then, to some of the things we picked out in this transition
4 between November and December.

5 If we look at exhibit 6, which is back to the M4T Core Team, at page 36, November
6 20th, the text you sent to the group says, "Whatever media hit you guys did in the last
7 hour and half is really delivering!"

8 Tell us what that means.

9 A So that means, whatever media hit they did, lots of contributions were
10 coming in. Like, I saw a noticeable uptick in the frequency of contributions coming in.

11 Q And for those of us who don't work in this world, what does -- give us a
12 sense of what an uptick in frequency might look like in this context.

13 A So, in this instance, I can't say specifically. But, generally speaking, like,
14 maybe we were getting 4 to 10 contributions an hour most hours, and a significant uptick
15 would be, like, all of a sudden there were 200 or 300.

16 Q And if you look at the bottom of the next page here, on page 37, it looks like
17 you sent a screenshot?

18 A Yeah. And so this is one of the issues I had with production. Frankly, to
19 show good faith and because of the previous things that had happened, I wanted to go
20 through and redact the individual donors' names.

21 But this is a case where I noticed a significant contribution come in. And when I
22 see somebody gives a thousand dollars straight and then a hundred bucks a month, I
23 would forward that on to Amy and the rest of the team, like, this person deserves a
24 phone call.

25 Q So you went right to what my question was going to be about this, which

1 was: In your professional work at this time, was a \$1,000 one-time contribution a
2 notable donation to the cause?

3 A Yes.

4 Q And so --

5 A Well, I won't say it was overly notable, right? We were getting quite a few.
6 But it was that he did a thou -- I remember he did a thousand dollars and a recurring
7 hundred dollars, which is a significant commitment.

8 Q And when you said earlier raising -- correct me if I'm wrong. I think you
9 had said earlier that the fundraising for Women for America First during this time period
10 generated a few hundred thousand dollars?

11 A Which time period are you referring to?

12 Q Well, let me actually just ask you: Between this
13 post-election-to-January-6th timeframe, how much, if you had to ballpark it, were they
14 raising?

15 A I believe, in grassroots contributions, I believe we brought in between
16 \$700,000 and \$800,000.

17 Q And that does not count the \$250,000 donation --

18 A That is not including the Lindell donation or any other large donations the
19 Kremers may have got without my knowledge or, you know, have shared with me.

20 Q Okay.

21 Another financial piece. If you go to page 56 of this exhibit, exhibit 6, the bottom
22 left is Amy Kremer sharing a screenshot with the group that you can't read in this but you
23 can zoom in. And if you look in the front cover of your binder, there's something that's
24 hand-labeled "exhibit 6A." This is a magnified version of that screenshot.

25 And, in it, James Lyle says to I believe Amy and Kylie, "Please push on Bannon for

1 the second 20K." Do you know what that's in reference to?

2 A So "Steve Bannon's War Room" had -- we had had Kylie reach out to get
3 them to sponsor. I believe that they had agreed to a \$25,000 sponsorship, and I believe
4 they paid \$5,000 of that up front and \$20,000 was still outstanding.

5 Q But I take it you didn't have any role in generating that donation?

6 A Unfortunately, we were still unable to contact Steve directly. However, we
7 did tell -- like, we sent Kylie to talk to Steve, who made it clear that we were a part of it,
8 and we assumed that that would be helpful.

9 Q So this donation was to help support the December 12th rally?

10 A The bus tour specifically. And, in exchange for the contribution, the "Steve
11 Bannon's War Room" logo was put on the bus.

12 Q Okay. And you believe that was a \$25,000 donation to Women for America
13 First?

14 A I do, yes. I don't know that the second \$20,000 ever got paid, but I think
15 they did pay an immediate \$5,000, and there was still, like, 20,000 outstanding, to the last
16 of my knowledge.

17 Q If we look at exhibit 3, at page 3 -- exhibit 3 is a text conversation that
18 includes you and Cindy Chafian and Amy and Kylie Kremer.

19 On December 5th, if you look in the middle of the page, Cindy Chafian writes, "I'm
20 planning to speak with Jericho March tomorrow. I need confirmation that you want me
21 to be clear that we are in no way working with Ali or stopthesteal.us at all. That if they
22 intend to proceed with that partnership we will not be incorporating their March plans on
23 our permit."

24 I think you had earlier described November as being a group effort and then
25 December it's not. Is that what this is in reference to?

1 A Yeah, so this is also around the time that we start getting red flags from
2 Cindy that she is kind of collaborating with, for lack of a better term, the enemy at that
3 point, right, which is the Ali group.

4 And a lot -- there was a lot of controversy internally about the Jericho March
5 because we had done a pretty blanket securing of permits, like, around town. So we
6 had permits for not just Freedom Plaza but we had also, I think, grabbed, like, four or
7 five -- like, we had secured the permits for several other locations so that it would be
8 more difficult for, like, groups to kind of break off and do their own thing.

9 And there was a call between me and Cindy and the Jericho March leadership,
10 like, on the bus at one point, that seemed to go really well, that we were going to try to
11 work together. And then Cindy had come back, like, shortly after that saying that they
12 had kind of, like, stopped responding to her. And eventually what we found out is that
13 they were working with Ali on some of their stuff.

14 And this is Cindy asking us if that's a deal-breaker and getting the response that,
15 yes, it's a deal-breaker.

16 Q So, when Cindy Chafian says that she's speaking with Jericho March, do you
17 know who that is?

18 A I can't remember specifically. It's the couple who's been doing it forever.

19 Q Last name Weaver, do you know?

20 A That's sounds correct to me, but it's a couple who have done it, like, for a
21 long time.

22 Q And was the concern with Ali at this point over rhetoric, or was it over, sort
23 of, the trying to take credit for stages that he didn't actually contribute to?

24 A Well, so, at this point, a lot of it's personal, because he is regularly attacking
25 us. And, more specifically -- I shouldn't say "us," because he never really fired any shots

1 at Jen and I, but he was really getting nasty with the Kremers. And, like, it was getting
2 ugly. So there was definitely a personal element to it.

3 But this is also when, like, the -- right around when Roger Stone put out the attack
4 that we weren't allowing them to speak on our stages because their language was too
5 harsh, right? So that was -- this is probably right when that was starting to bubble up.

6 Q And so, ultimately, there was no association with Jericho March or Ali
7 Alexander for December 12th.

8 A None. In fact -- and that would get to -- so they would do -- they did their
9 own separate program and stage on December 12th.

10 And to go back to the, quote/unquote, "appeasement" agreement, one of the
11 things that was a justification to make the agreement to me at that point was that the
12 difference in how the crowd looked in November versus December was significant.
13 Even though the attendance was, I think, slightly less for the December rally, but not by
14 that much, it looked significantly less because we had split the crowd. They had done
15 their own stage, I can't even remember where, and we had done the same program at
16 Freedom Plaza.

17 And there was discussion around the January stuff of not splitting the crowd so
18 that the crowd looked as massive as possible for wherever Trump was going to speak.
19 Because, frankly, he's into the biggest -- you know? So --

20 Q I understand.

21 Same question about security but specific to the December event. Do you recall
22 conversations about how you were going to deploy new security for December?

23 A Yeah, so December is where it really gets into it.

24 So Cindy is -- what's the word I'm looking for? Not "passionately," but she is
25 vociferously advocating that we use 1AP to handle security, right? "It's cheaper.

1 They're great guys. All they want us to do is some emails to help them raise a little
2 money." And we're not having it at all.

3 So we reached kind of an agreement where 1AP would act as a secondary barrier,
4 but the professionals would handle the inner barrier. And I kind of referenced this a
5 little bit earlier, in that sometimes we would let the volunteer guys kind of feel like they
6 had a role kind of on the outskirts as, like, a secondary barrier, but the professionals
7 would be the ones handling the real security.

8 And the December rally is also where we got -- I didn't -- I wasn't there for it -- but
9 Jen, my fiancée, was there for it, and I think Amy and a couple other people, received
10 their security briefing, which included, like, maps that they had just printed off. And
11 their threat assessment, compared to the real threat assessment that I had seen, just did
12 not -- like, the two were night and day as far as, like, their professionalism.

13 Q Were there any assessments at November or December about -- talking
14 about threat assessments that you saw -- assessments that referenced the potential for
15 the crowd becoming unruly in any way?

16 A The December one, the threat assessment specifically was about
17 confrontations between counterprotesters and the crowd. That was the primary threat
18 concern in the December and January threat assessments that I saw.

19 Q But nothing about members that -- members of the attending public for your
20 event themselves being the source of violence?

21 A No, not at all.

22 Q Anything else specific -- you've already covered, I think, in pretty good detail
23 the Alex Jones stuff. Anything else stand out to you specifically about the December
24 event?

25 A The General Flynn stuff was, like, very pointed, in that we had the heated

1 discussion beforehand, which felt like a very tense situation.

2 The -- I'm trying to think if there's anything else that stands out.

3 It felt real -- like, compared to November, it felt like we had done a really good job
4 at adapting, and we felt that we did a vastly superior job with security. And then also
5 that there were vastly less confrontations between the people who -- we see ourselves as
6 representing, like, the Tea Party grandmas, if you will. And, after the November rally, I
7 remember how upset we were to go home and watch -- there were a bunch of viral
8 videos of, like, Trump people walking back to their hotel and getting attacked, like, even
9 old ladies and stuff. And I remember we didn't -- the feeling in December was
10 that -- there were a bunch of Proud Boys and antifa people who had, like, clashed; like,
11 both sides were out looking for the same fight. So, like, for us, the crazies are the
12 crazies, but our job was to protect and secure, like, the patriotic Americans who were
13 answering our call to come out and have their voices heard. And December felt like we
14 did a really good job with that.

15 Q When you say "the crazies are the crazies," is that -- you're referring to --

16 A I mean on both sides. So, like, the -- there are elements, right, within the
17 Proud Boys and some of these -- some of the militia groups that are, frankly -- they're like
18 soccer hooligans. They're looking to get into -- like, they get off on battling each other.

19 And you see it play out in, you know, these events all over the country where you
20 see the leftist crazies and the right-wing crazies fight each other with their shields and all
21 the other silliness.

22 Q But it was your sense that the security you had put in place for December at
23 least was sufficient to protect the Tea Party grandmas or the people who were coming to
24 show support but not be hooligans.

25 A Yeah. We didn't see any of the confrontation with people who

1 weren't -- like, who didn't seem like went looking for fights, right, who were just trying to
2 get back to their hotels, for example. So we felt like we had vastly improved, like, across
3 the board on how that was handled in December.

4 Q It's been, you know, publicly reported and I think there's a few videos of
5 Roger Stone speaking to crowds around this time outside the Willard Hotel. Did you
6 have any interaction with Roger Stone or his circle about his presence or involvement in
7 these events?

8 A We saw Roger Stone pretty frequently. There was a -- they would meet
9 nightly. But --

10 Q Sorry. When you say "they," who do you mean?

11 A Roger Stone, Ali, and, like, their most fervent supporters would meet nightly
12 and drink outside -- right outside at the JW Marriott.

13 And our rooms at the Willard overlooked the plaza. So, if things started to get
14 rowdy -- and I don't think -- actually, I haven't sent it over yet, but one of the things Jen
15 and I will provide subsequently, we actually have Roger Stone speaking to that group
16 outside one night that Jen I think captured on one of her videos.

17 A couple times when we saw confrontations, we went down to, like -- there was
18 a -- one time in particular, there was, like, a small group of, I think, Black Lives Matter
19 activists who were trying to provoke that crowd. That crowd seemed like they were
20 going to take the bait. And I remember then Jason Funes was running around, like,
21 screaming, "Argh, we must" -- and the whole thing seemed bad. So I believe me and
22 Pastor Gibson went down and organized everybody in a prayer circle and, like, kind of
23 calmed things down that way.

24 But they would meet and drink late into the night right around then. And it was
25 not uncommon to hear Roger or Ali speak to that group.

1 Q But you didn't have any communications yourself with Roger Stone?

2 A Nothing outside of normal pleasantries, like, outside -- because of my
3 association with Steve Bannon and the controversy surrounding the congressional
4 subpoenas, right, between him and Steve, there's never been a -- I think mutually there's
5 never been an interest in interacting with each other, outside of just being polite.

6 [REDACTED] Did you have anything on December --

7

BY [REDACTED]

8 Q For 1st Amendment Praetorian, can you just speak a little bit more
9 specifically as to, like, the division of labor between them and then, you know, the
10 professional security group that you all hired?

11 A Yeah. So the professional security group handled what we would call the
12 inner perimeter, which is really, like, everything behind the fences. That's stationed at
13 every entry point, managing getting the VIPs from the Willard to whatever stage they
14 were speaking at by golf cart and different routes. They handled -- so they handled all
15 of the entry points, all of the speaker movements, VIP movements, and any conflicts that
16 broke out. I think we had one issue in December at the media pen that the security guys
17 handled. So they were doing the bulk of the event security.

18 The 1AP kind of set up a, quote/unquote, like, "secondary perimeter," I think, like,
19 outside the fences to, you know, keep confrontations from happening.

20 It was -- where it becomes relevant: In hindsight, the Supreme Court police were
21 not probably -- were probably even less staffed than the Capitol Police were at the Capitol
22 on January 6th. But we had set it up so that there were volunteers and
23 professionals -- like, in December, at the Supreme Court, there were both volunteers and
24 professionals that anyone who was trying to cause a conflict with the Supreme Court
25 police would have to get through before that conflict ever happened. Because the

1 optics of fighting law enforcement is, frankly, counter to so much of how we on the right
2 portray ourselves.

3 Q So was the concern for why you did not want to have 1AP handle the inner
4 perimeter that they would be have strong of a reaction if someone was disgruntled or
5 something?

6 A Yeah, I mean, so there was a sense of -- and I remember using the Hells
7 Angels example on occasion. But there is also just a difference between people who do
8 this professionally and people who, even if they have backgrounds as veterans or law
9 enforcement, right, who are doing it not professionally, like, as volunteers.

10 And so the concern wasn't so much that we thought that they would -- that we
11 actively thought they would cause problems, right? It wasn't so much that we thought
12 that the 1AP guys were bad actors at that point. But the concern was that -- well, and
13 they also -- you know, with professionals, they come with liability insurance and, you
14 know -- so it just -- but there was less concern that they would be over the top that way.

15 But they also looked differently, which is, the professional security guys aren't
16 wearing tac gear, right? They don't look like paramilitary. The professional security
17 guys look like professional security guys. And the optics that we were trying to project
18 was not, this is a paramilitary group looking to take over. This is a professional group
19 that you can come have -- that you could, Tea Party-style, come have a safe, productive
20 time, right, airing your grievances with people who are like-minded.

21 Q So was it a concern that, just by their gear, it would almost project a more
22 militant message than you intended?

23 A Absolutely.

24 And we knew -- and it's not that we were actively -- like, that we were
25 discouraging people who wanted to do that from coming. It was more of -- like, it

1 was -- because there were lots of people in there volunteering for me who I would fit kind
2 of into the same kind of category with patriot groups. So it's not that we were
3 discouraging them.

4 But it's what the optics look like from the stage, which is projected out to the
5 world through the cameras, and also to the people who are there. It's not necessarily a
6 bad thing to have those people to discourage, like, possible counterprotester attacks.
7 But it wasn't the image that we were trying to project.

8

BY [REDACTED]

9 Q Is it safe to say that that concern about projecting a militant message might
10 be compounded negatively if the message is also ramping up rhetoric suggesting
11 violence?

12 A Yeah, I think so. I mean, I think that there's a -- like, it's a fine line with
13 political hyperbole and rhetoric and with the language of fighting, right, that all politicians
14 use on both sides. The trick is using strong rhetoric to bring people in and then making
15 sure that you give them an outlet to vent that kind of frustration productively.

16 And, if you're projecting militant, what you're steering them to is militant. And
17 our goal was to steer them into, like, more engagement with their Members, right, their
18 elected Representatives and in their local elections and getting involved in the process.

19

BY [REDACTED]

20 Q So, at that point in December, was the strategy more like reaching out to
21 your legislators or Members of Congress?

22 A Yes. At that point, I think the Rally Congress had really taken off. We
23 were putting up big numbers. We had modified it to incorporate the -- well, I don't
24 know if we did it before or after the 12th, but at some point I modify the sample letter or
25 even create a separate Rally Congress campaign that's centered around the objections

1 and stuff.

2 But the Rally Congress was one of the primary things that we were steering people
3 towards.

4 Q Just real quick, I think you've mentioned golf carts a few times today. Can
5 you just tell us real quickly what the purpose of the golf carts were at the two rallies in
6 November and December?

7 A Yeah. So, in coordination with Metro, we had shut down huge swaths of
8 areas surrounding Freedom Plaza and --

9

BY [REDACTED]

10 Q Just to clarify, when you say "Metro," you mean the Metropolitan Police?

11 A Correct.

12 Q Not the Metro underground trains?

13 A Yes. No, the police force -- and several other parks and other agencies.

14 So we had huge areas shut down to nothing but foot traffic, right? There was no vehicle
15 traffic for, I want to say, in December, it was, like, 12 square blocks at least. And so, to
16 get around quickly, we had -- I think we had four or five golf carts in November, and I
17 think we upped that to, like, eight in December.

18 And, like, for me, personally, if I needed to go to the Supreme Court because the
19 staging guy needed an adapter or something, or Jason calls and General Flynn is going to
20 show up suddenly, we would use the golf carts to get from point to point quickly.

21 Q All right.

22 Let's start talking about the planning for January 6th.

23 A Okay.

24 Q If you go to exhibit 7, this is another text message thread that you provided
25 to us. The title of this one was "March For Trump Bus Team," which was distinct from

1 the "M4T Core Team" text.

2 A There were a lot of groups.

3 Q And you go to page 25. Page 25 -- and I should've asked you this at the
4 outset. Because these are the text messages that you produced to us, and I understand
5 that you live full-time maybe, you know, towards the West Coast -- or, I guess I wanted to
6 ask you, do you know whether the timestamps on these text messages reflect eastern
7 time or mountain time?

8 A I have no idea. Like, Jen and I spend our time -- we have a house in Florida.
9 My kids are in Reno. We have a place down in Vegas. So we're kind of bouncing
10 around a lot, so I'm not sure.

11 Q Okay. Fair enough.

12 So December 19th here, there's a text that you send to this group, "Welp, we
13 know where we need to be." And it looks like it's sent alongside a link to a tweet that,
14 you know, "President Donald Trump Calls for Protest in D.C. on January 6th."

15 Does this reflect the first time you heard about January 6th being a date to gather
16 in D.C.?

17 A In my review of the text messages, there is another text message that may
18 have just been between me and Amy that may have been the 18th, like, in the preceding
19 days, where Amy directs us to have Cindy pull the permits for the 6th that I believe came
20 before this, but shortly before this.

21 Q Well, let's go -- I think we might have that at exhibit 6 at page 59.

22 In the middle of that page, also December 19th, but this is at 3:16 a.m. --

23 A There you go.

24 Q -- Amy Kremer says, "I think we have to have Cindy pull the permits for
25 January 6th. Thoughts?"

1 What does that -- when I read that, if I hear someone say "pull the permits," my
2 first question is, does that mean to cancel permits that had already been filed?

3 A Amy there is saying, go secure the permits. Right? So go to the Parks
4 Department, pull the paperwork, secure the permits.

5 Q Okay.

6 So December 19th is -- that gets me back to the original question I asked, was,
7 does this reflect the first time you had heard about January 6th being a day to gather in
8 Washington?

9 A Yes. I think so.

10 Q Okay. Do you remember any other conversations preceding the
11 conversation with Women for America First about permits, knowing that January 6th was
12 a day that maybe you should have an event in D.C.?

13 A No. Because I remember discussing making sure we had the permits
14 around the inauguration, which the Inauguration Committee actually controls. Actually,
15 they control actually going all the way back to these two, that we had to get them
16 released from the Inauguration Committee.

17 But -- yes. But, before this, this is also right around when I believe Amy first told
18 me that she thought the President was going to speak at the January 6th event.

19 Q So was that -- immediately, was the thought that the President might speak
20 for this event?

21 A So it was right around this time on the 19th, like, shortly before Christmas.
22 I can't remember. And this was a conversation. I remember Amy excitedly telling me
23 that Trump had done the drive-by in November, he'd done the flyover in December, and
24 she was almost certain that he was going to speak in January. And my guess is it's
25 actually probably, like, the night of the 18th.

1 Q Do you know why Amy decided to hold an event on January 6th?

2 A My assumption was that she had heard from somebody that that was the
3 day.

4 Q If we go to exhibit 9, this is the text thread that you labeled "March for
5 Trump II."

6 At page 3, on December 26th, the day after Christmas, Kylie Kremer texts this
7 group, "Effective immediately, no further communications with Cindy Chafian regarding
8 anything WFAF," and goes on to explain, you know, talk to Kylie or Amy about this.

9 Tell us what happens between December 19th and December 26th from your
10 perspective.

11 A Yep. And this is one of those butterfly effect moments, in my personal
12 opinion.

13 So Cindy's role through November and December was primarily to handle the
14 permits and the bureaucracy, right? So she's providing the COVID mitigation plan, the
15 emergency escape route, right, and all the different boxes we had to check to hold a
16 march -- the first aid kits, the medics, the first aid stations, the stopping station, blah,
17 blah, blah, blah. Right? Her primary role was, like, handling that process, day in and
18 day out.

19 Around this time -- so security had noticed -- I believe it was Lyndon personally.
20 I'd have to double-check with him, but almost certain. Lyndon had noticed Cindy having
21 breakfast with Alex Jones, who we had just filed a police report for and beat back from,
22 like, attacking our stage, and -- which sounded concerning.

23 When we confronted Cindy about it, what she told us, frankly, just rang as, like,
24 yeah, that's not really what Alex Jones said.

25 Q What did she tell you?

1 A That Alex was apologetic and wanted to work together and -- like, it just -- I
2 can't remember exactly, like -- but I just -- I remember being like, yeah, that's not -- like,
3 she's not being genuine there.

4 Shortly after that, Cindy had gone to the Parks Department and changed the
5 permit from "Women for America First-Cindy Chafian" or "Cindy Chafian, Point of
6 Contact," and just removed "Women for America First" from the permit.

7 And it was around the holidays. I remember, when we found out about it, we
8 couldn't immediately get to the Parks Department to be like, she was not authorized to
9 remove the organization and give herself the permit. So it was -- I want to say it was,
10 like -- it was a long wait, maybe 4 days, before we could get to the Parks Department and
11 get the permit situation switched back to Women for America First.

12 Q Do you know how they were able to accomplish that?

13 A Yeah. So I remember specifically, like, that we were waiting for them to
14 open at 8:00 a.m. on Monday morning or Tuesday morning, whatever the day they
15 opened back up was, right, where Amy and Kylie -- maybe Kylie even went in person?
16 I'm not -- no. It was before she went to D.C.

17 Anyway, we reached out to them as soon as the office opened to explain that we
18 had had this staff-slash-volunteer go rogue and try to take the permits from us without
19 authorization from the board or anybody in the organization and we needed to rectify
20 that.

21 And, in the interim, there was a short period of time where Cindy Chafian actually
22 did technically have the permits for January 6th, right? So she was in -- in that time
23 period between when she changed them and we found out about it and we were able to
24 get Parks Department to switch them back, there was a time that she had technically her
25 name on the permits for January 6th.

1 While I don't have firsthand knowledge of exactly what the arrangement was, it is
2 my understanding that she took money from Alex Jones, like, a significant six-figure
3 payment from Alex Jones and possibly Ali to put them front and center on January 6th,
4 because they had felt slighted over the fact that they hadn't been given much of a role at
5 the December rally at all.

6 And Cindy -- so this is Kylie letting -- we'd been dealing with it before this, but this
7 is Kylie letting the rest of the group know that we've uncovered this plot by Cindy to try to
8 take the permits for her own benefit, and we'll be getting them back, don't worry, but
9 nobody associate with Cindy.

10 Q So the original permit that was submitted by Women for America First was
11 for Freedom Plaza, right?

12 A Right. Yeah. We were doing the exact -- we were -- for organizational
13 reasons and just, you know, sheer logistical reasons, we were going to use the exact same
14 model and template that we'd used at the two previous rallies.

15 Q So how did it end up being at the Ellipse on January 6th?

16 A So, when Trump -- when it was confirmed that President Trump was going to
17 speak to the rally, it was taken -- it was basically taken from us, like, the group, minus
18 Kylie, who on New Year's Eve flies I think from El Paso to D.C. to kind of represent us in
19 the new planning group, which includes Katrina Pierson, Caroline Wren, Megan
20 Mulvaney, Justin Caporale, and -- who am I forgetting?

21 Mr. Nass. You mentioned Caroline Wren.

22 The Witness. Yeah, Caroline Wren, Katrina, Megan Mulvaney, Justin Caporale,
23 Kylie --

24 [REDACTED] Was Megan Powers involved?

25 The Witness. I'm not sure.

1

BY [REDACTED]

2

Q But a group of other people are --

3

A Yeah. So, essentially, it's taken over by, like, Trump Team, as we called them on the bus, and we were kind of relegated towards the bus tour.

5

And then, shortly thereafter, I was asked to at first kind of coordinate the agreement on January 5th and then later called in to, like, bail it out, because it was, frankly, a shitshow. So they asked me to leave the bus tour early and salvage what I could for January 5th.

9

Q So let's just take a look, then, at further on, page 5 of this exhibit. In the middle of the page, Amy Kremer is I think sending a tweet showing an image of somebody with a selfie.

12

A I believe that's a video.

13

Q Oh, okay. Sending some kind of media file to the text --

14

A And that's Scott Presler.

15

Q Okay. So it's a video of Scott Presler saying something about, you know, being in January on December --

17

A Oh, it's a tweet. It continues on the second page.

18

Q So Amy is sending this post referencing Scott Presler, you know. And she says, "Not only are they doing the 5th, they are also doing the 6th too." "Interesting," Scott Johnston says. And then Kylie says, "RIGHT! Because it's all the people who aren't invited or POTUS won't be associated with."

22

And then, further down, I won't read this, but it seems like, from having read through this, there is -- I don't want to mischaracterize it, but was there some internal conflict among the folks who had been involved on the bus tour regarding how all of the organizing for January 5th and 6th was now unfolding at this time period?

25

1 A Yes.

2 Q Can you explain that to us?

3 A Yeah. So we put together the two D.C. events and these two bus tours.
4 Our team was running on fumes at that point. And there was contention even initially
5 of why we would send Kylie to D.C. to kind of, like, represent our interests, right? So
6 there was some initial with that, and then there was tons of concern about what
7 feedback we were getting from Kylie and from, kind of, the D.C. organizers about how
8 that was all shaping up.

9 And this one with Scott Presler is -- do you see the date on that, by the way?

10 Q I believe from the preceding page you see that it's December 31st.

11 A There we go.

12 So, at this point, I believe -- yeah, at this point, I'm helping the pastors negotiate
13 what I'm calling the appeasement rally. And I'm already kind of not happy about that,
14 right, which is, now you're -- so now you're saying that I'm relegated to putting this event
15 on the 5th, not the big event but the little event on the 5th, and I have to include all of
16 the most toxic personalities and -- right?

17 And this is Amy expressing the frustration -- and there's another thread
18 somewhere -- I don't know that I came across it when I was digging through this
19 stuff -- where it's a Matt Couch tweet, as well, that still has them promoting event at the
20 Capitol on the 6th. This is what preceded me and Amy having the conversation about
21 going to Meadows and Mercedes Schlapp and everybody else we could think of to, like,
22 squash what was happening. Because, to us, this was them violating the agreement
23 that we had reluctantly accepted for the appeasement thing anyway.

24 And what we kept getting back from Kylie were these, like, angry rants. And
25 these were followed up with also, like, angry phone calls, right, where it would be -- as an

1 example, we wanted to make sure that the pastors had a role on January 6th. Like, they
2 had put money up, they had provided venues and helped bringing out crowds all over the
3 country. We wanted to make sure that they had a speaking role and were concerned
4 that they weren't going to have that opportunity. And that also includes, like, Jen and I
5 and everybody else who was kind of on the bus tour side of things.

6 And we continued to get feedback that there was this internal conflict on the
7 organizing group about what the event at the Ellipse was going to look like, who was
8 going to be able to speak, et cetera, et cetera, et cetera.

9 And so there was a level of, like, confrontation over that. And then there was
10 continued confrontation over how things were going with the, quote/unquote,
11 "appeasement rally" to the point we almost blew it up completely, like, right before it
12 happened. Like, it was a last-minute decision for me to say, we'll go forward with this
13 without -- let's -- it was really close to just pulling the permits entirely, not letting anyone
14 do anything on January 5th.

15 Q So let me see if I understand this, in terms of some of the conflicts you've
16 identified.

17 There is a conflict over what you've referred to as the appeasement rally, which
18 involves, on one side, what role, if any, the pastors would have, and other folks from your
19 team --

20 A Yep.

21 Q -- because you've more or less been relegated to that on the 5th, and also --

22 A I'd like to clarify --

23 Q Sure.

24 A -- that we were assured right up until -- actually, it wasn't until Caroline
25 Wren told me the night before, like, on late the night of January 5th, that I was told that

1 none of our people were speaking except Amy and Kylie.

2 Q Okay. So that just cuts straight to a question I wanted to ask, in terms of
3 teeing up these conflicts. Why did Caroline Wren have a say in all of this?

4 A So I was only a loose acquaintance of Caroline. Like, I'd only interacted
5 with her briefly a couple times before the night of January 5th.

6 And we were having an issue -- so the night of the 5th, the, quote/unquote,
7 "appeasement rally," actually it turns out all right, right? Like, it goes pretty well overall.
8 Everybody changes the stage over when they're supposed to, and it goes off pretty much
9 without a hitch.

10 And, at this point, I am wiped out. And the Kremers are freaking out in the suite
11 because they don't have their VIP badges, like, for all of our VIPs. And we're told -- like,
12 we keep getting basically "it's in the mail"-type messages. "Oh, somebody's on their
13 way right now with them," and they keep not showing up. And so it's a -- all of our, like,
14 VIP people are angry at us because they're seeing other people with their VIP badges
15 already.

16 And it's late, maybe 11:00 p.m., midnight. And I'm walking through the lobby of
17 the Willard, and Alexandra Preate, who I know from her being a long-term -- like,
18 Bannon's long-term media gal, stops me and reintroduces me to Caroline, who I'd talked
19 to a little bit earlier. And they invite me up to their suite because they want to talk
20 about a couple things with me.

21 And so I go up to the suite, and Caroline has the stack of our, like, VIP badges right
22 there. And she proceeds to literally say, like, "Fuck Kylie Kremer. She's the worst
23 person I've ever worked with ever." And we have maybe a half-hour-or-so conversation
24 where essentially what she's trying to do is separate me from the Kremers.

25 But she tells me a lot of stuff. So she tells me that she raised --

- 1 [Coughs.]
- 2 I'm sorry. Give me a second.

1 [3:02 p.m.]

2 The Witness. So she tells me that she raised \$3 million. She's the one who
3 raised all the money and paid for everything at the Ellipse, and the Kremers paid
4 absolutely nothing, which was news to me because the Kremers had been pressuring me
5 to ramp up fundraising since like Christmas-ish, saying that like we were completely out
6 of money, and we weren't going to be able to continue unless, like, I pulled a rabbit out of
7 the hat. And I was able to go to another guy who's in my business, who was able to do a
8 rev share that was wildly successful in, like, cover stuff.

9 But it was portrayed to me that like we were spending a massive amount of
10 money on this January 6th event. And Caroline told me that she raised the \$3 million,
11 and that she parked the money with the Republican Governors Association, TPUSA, and
12 Tea Party Express.

13 And I actually clarified with her, because, like, I assumed she meant Tea Party
14 Patriots, but she clarified that it was Tea Party Express, which seemed interesting because
15 both Amy and I have our political roots there.

16 And she tells me that she's not giving -- that she's not giving the VIP badges over
17 to the Kremers to fuck them over, that's her language, because Kylie Kremer is the worst
18 human being she's ever interacted with, ever, and that -- she also says that Kylie is so
19 stupid that she actually fought to make her organization the one on the, like, headlines,
20 which is just a liability nightmare, right.

21 She's like, I don't -- these people are having, like, blowups over something no one
22 else wants anyway. And she tells me that -- so she tells me about the money. She tells
23 me about the badges. She tells me about parking the money at the different
24 organizations. And she gives me a couple of badges for Jen and I.

25 And I immediately -- and I believe I included these, so it's one of these text threads

1 that might not make sense like if you just read it outright, but I text the pastors like late at
2 night, because I had made an appeal to her to make sure that like the -- make sure the
3 pastors got in without trouble.

4 I was still processing, like, everything I had heard from her at that point. But I
5 remember when I told Jen about it, like immediately afterwards, I remember telling her
6 how sad these people are to think that in one conversation you would be able to separate
7 me from people I've been working with from a decade with anything you say.

8 And I had made -- so I made it my mission to make sure that all our VIPs got in.
9 So the next morning I got up -- like I basically didn't sleep at all.

10

BY [REDACTED]

11

Q Can I ask you one question?

12

A Yes.

13

[Discussion off the record.]

14

The Witness. Oh, super important, yep.

15

The other thing that stood out, and I'll never forget because it was just so
16 ridiculous. She said that the reason -- she goes, you want to know why I've advocated
17 so hard for Alex Jones and Ali? And I said, sure.

18

And she said that whenever she calls them or talks to them, their focus is just on
19 the mission, and they are just so selfless, like they really just -- it's always, how can we
20 help, what can we do for the -- what can we do to help President Trump. And it
21 just -- having watched Ali's Periscopes and, right, had the interactions we had, it was just
22 so ridiculous on its face. I remember like struggling to keep a straight face when she
23 said it to me.

24

And so the next morning --

25

BY [REDACTED]

1 Q So let me, before we move away --

2 A Sure.

3 Q -- while we're talking about this conversation, let me clarify a few things.

4 This is at the Willard Hotel?

5 A Correct.

6 Q On the night of January 5th?

7 A Correct.

8 Q That's after the end of the Freedom Plaza rally?

9 A Yes.

10 Q Who else is there with you?

11 A Alexandra Preate.

12 Q And did she hear all of the same things that Caroline told you?

13 A I believe so, yes. I mean, they had a big suite. It was -- right, it was
14 almost -- maybe even the same layout that we had. I think we were in the Jefferson
15 suite, right. It's big. It had two big rooms and a big dining room, and they were kind of
16 moving in and out. I remember Alexandra had a conversation with her dad about like
17 political strategy and what was happening for a little bit. So I don't know for sure that
18 she heard all of it, but I think she was present for almost all of it.

19 Q Did Caroline tell you anything about her contacts or ability to sort of have
20 persuasion with the White House?

21 A Well, I knew beforehand, I knew Caroline as, like, Kimberly Guilfoyle's, like,
22 fundraising girl. And so, I kind of -- she didn't say it because people who do high-dollar
23 fundraising like that really hoard their like contacts closely. But she was very specific
24 about how much she raised, where she sent it, and what it -- like that she -- that was the
25 money used to pay for everything at the Ellipse event.

1 Q In your professional experience, is it common for fundraisers to, in your
2 words, park money at different organizations?

3 A There is. In the 501(c)4 world, there are these organizations that because
4 of the idiotic way our nonprofit laws are designed, my personal opinion, the (c)4 groups
5 are 51/49, so 51 percent have to be nonpolitical but 49 percent can be political, and you
6 don't have to report the donors in the (c)4 structure.

7 So if you have a big donor who is willing to write you a big political check, you
8 have to have a robust enough percentage, right, to still be 51/49, to stay within the legally
9 mandated, like, percentages of activity. I think I described that pretty well, actually.

10 So there is, on the shadier side of stuff, right, an understanding that there are
11 certain groups that if you have a big political donor who wants to remain anonymous,
12 that, like, they have the extra space to take that money in and spend it politically without
13 it exposing the donor.

14 Q And you said those three organizations were --

15 A RGA, Republican Governors Association; Turning Point USA; and Tea Party
16 Express.

17 Q Did she mention anything about the Republican Attorneys General
18 Association?

19 A I actually may be wrong with the RGA. Maybe it was the -- I actually think
20 you're right, actually. I'm sorry. It was RAG -- the acronyms get mixed sometimes. I
21 think it was the Republican Attorneys General. I think I got mixed up with Republican
22 Governors Association.

23 Q So the organizations that Caroline Wren told you she parked the \$3 million
24 with was the Republican Attorneys General Association, Turning Point USA, and the Tea
25 Party Express?

1 A I can say with 100 percent confidence TPUSA and Tea Party Express. It
2 could've been RGA or, right, attorneys general, but it was something "R."

3 Q And that was, by Caroline's own telling, all the money that was being used,
4 or all of that money was going to pay for the Ellipse rally?

5 A So she didn't say all of the money is being -- but that she was paying for
6 everything at the Ellipse with that money, that she had raised all the money to cover
7 everything that happened at the Ellipse.

8 Q And so that raises another question about the -- I'm blanking -- appeasement
9 setup. You had mentioned this morning that the conflict between the different groups,
10 sort of Women for America First on one side, and you actually mentioned Caroline Wren
11 as being on the other side. But Ali Alexander and Alex Jones and Roger Stone only speak
12 at the appeasement event despite Caroline Wren having bragged about paying for all of
13 the Ellipse event.

14 A And Amy and Kylie end up speaking, which I -- she also was very not happy
15 about, like clearly had fought all the way up until, like, that night right before. And I
16 really do remember just thinking, like, did you really think that like the President of the
17 United States was going to share a stage with, like, I think I call them clown show and side
18 show, and, like, I mean, there's lots of texts of us like just mocking them outright. It
19 seemed like inconceivable, like just inconceivable.

20 And so it just -- I've theorized -- like, I've spent a lot of time thinking and theorizing
21 about what that might be, right, like how that played out. My initial assumption was
22 that they were just being full of it, like that they were just lying about having these
23 connections and talking to people, right, or they were talking to somebody who talked to
24 somebody and somebody.

25 But the Matt Boyle article, which I believe was like January 3rd or 4th, was the first

1 time that like, I kind of saw those cracks. But we had been hearing back about this
2 internal conflict between basically one side led by Katrina, and one side led by Caroline
3 about what the program and the setup for January 6th would look like.

4 Q And then how, if at all, did the concerns that you and Amy Kremer and
5 others on the bus tour had about who Ali and Alex Jones were, and what they advocated
6 for play into this conflict that Caroline Wren was on one side of?

7 A I mean, it was central, right, which is we were incredulous that we were
8 even still having this discussion. Then reluctantly, we, like, were helping put together
9 primarily through the pastors, but like, first, I'm helping the pastors negotiate, like, their
10 agreement with Ali and Cindy, and Cindy's trying to charge like what I know to be
11 outrageously marked-up prices for vendors and other stuff, right.

12 So I'm already really, really not happy. And there's a thread that has started, and
13 I don't think I even text in it once. Like they put me on it, so I'm aware of like what's
14 happening, but like, frankly, I was less than pleased like to be stuck on that duty and was
15 continuing to be assured that, like, we would have a prominent role on the 6th.

16 And that conflict, I steer it back to that moment when Cindy had the permits in
17 her name, and what I have theorized, and I don't know for sure, but I've always thought
18 that somehow an -- like they were promised in return for coming up with the donor or
19 the money, and that once we got the permits back, that put them in a tough spot where
20 they probably promised Ali and Alex prominent roles that they weren't going to be able to
21 deliver on.

22 That was -- and, again, that's just me theorizing and kind of what I was thinking at
23 the time.

24 Q So let me ask a specific question then. Earlier today, you talked about
25 raising concerns to the White House about the potential for --

1 A Problems.

2 Q -- problems, violence.

3 A Yep.

4 Q And what you said this morning was that it was your understanding, or you
5 were led to believe, Amy Kremer was taking those concerns to Mark Meadows?

6 A Yes, among others, but that was -- when we talked about it, we saw taking
7 this kind of thing to the White House Chief of Staff as like a serious, like we're only going
8 to call in that card if we absolutely have to, but it's reached that point now.

9 Q So are those communications separate from the communications that have
10 been reported on about Katrina Pierson going to the White House to help resolve
11 conflicts over speakers?

12 A Yes. So the decision to take it to Meadows and others was because we
13 were frustrated with -- that Katrina didn't seem to be able to settle it. And then there
14 was also another piece, that somebody represented as Trump campaign or White House,
15 we were told to get a second bus to -- that if we got a second bus, we could park it behind
16 the President stage, like it could be parked prominently behind the stage at the
17 President's rally in Valdosta.

18 That second bus ended up costing us, my off-the-top-of-the-head number is
19 between like \$2- and \$300,000 to like get it wrapped at the last minute and get it sent.
20 And when they got there, so like Amy and Lindell and a contingent like broke off. The
21 bus, like, met them somewhere along the way. We had to get new security guys, right,
22 like because we had double security, double driver, right, last-minute cost to wrap the
23 bus, but if we could park it behind the President at a speech, it was probably worth it.

24 And they didn't end up parking within like 2 miles of the stage, like of the event.
25 And I remember being irate about that. And it's also what led to the cash crunch that

1 we had going into like Christmas, when we're in Vegas, and Amy comes to us and basically
2 says, like, We don't have enough money to keep going unless we come up with
3 something.

4 And at that point I approach another like digital fundraising vendor, and am able
5 to get him to come down on his insane rates and make like a decent deal with Amy.
6 And he proceeds -- he raised something like, I want to say, \$350,000 over the course of
7 like 3 or 4 days, which allowed us to continue the tour.

8 Q And who is that person?

9 A Jack Daly.

10 Q So, but my question was about the line of communication to Mark Meadows
11 about violence.

12 A Yeah. So we had tried with Katrina, right. So like Katrina was the primary
13 person, because you set up, like, lines of communication so that you're not
14 inundated -- right, you want -- we didn't want to come across as unprofessional where
15 everybody is calling everybody. So it was primarily Amy, and then Amy to Katrina, and
16 then Katrina on. And I should say, Katrina and Kylie once Kylie joins them in D.C.

17 When that -- when we see things like the Scott Presler tweet and the Matt Couch
18 tweet, it's clear it's like still an ongoing issue, and that's when we decide to kick it up to
19 Meadows for optics and violence and organizationally. Like I remember specifically,
20 those people don't have the wherewithal to, like, put something together to handle
21 what -- like the intensity or the scale of an event at the Capitol on January 6th.

22 Q Now, while we're talking about communications, there's been public
23 reporting about the Kremers' use of prepaid phones, burner phones. Are you familiar
24 with this reporting?

25 A I am familiar.

1 Q Is there any truth to that, that there was the use of these burner phones to
2 communicate with the White House?

3 A I do believe that's true.

4 Q Did you see that happen?

5 A I did see the -- I did -- I do recall Jen asking Kylie why she had multiple
6 phones. I do recall like -- sorry. I'm just thinking about this one. There's a lot of
7 people who got caught up in this stuff who are mostly just innocent bystanders,
8 volunteer-type people. I know who the source of that story is.

9 Q I'm not asking you who the source of the story is, but --

10 A Yes, and I know he actually did it. Like I remember that morning, like him
11 having to run like to the store because like we had limited vehicles, so like
12 somebody -- right, you had to run by if you were taking one of the vehicles out. I
13 remember him going to do it and then mentioning that he'd bought three phones.

14 Q Do you know why they were using prepaid phones?

15 A No idea. I mean, the obvious answer is to, right, conceal who they were
16 communicating with.

17 Q And who was using the prepaid phones?

18 A To my knowledge, Kylie. I didn't recall Amy having one, but I know the
19 public reporting says that one was given to Kylie, one was given to Amy, and I don't think
20 it's reported where the third one went.

21 Q The communications that you've produced to us, are any of those, to your
22 knowledge, with any -- the Kremers using a burner phone?

23 A No, not -- I never had the burner phone numbers, called them on it and, to
24 my knowledge, never used it for calling or anything else.

25 Q So you don't even know the phone numbers that are associated with those

1 burner phones?

2 A I do not, no.

3 Q Do you know about what -- when those burner phones were purchased?

4 A I -- off the top of my head I don't, but I do know how to get -- I know that
5 they were purchased from a, either a CVS, or a Walgreens in California, specifically -- it
6 might be -- I can't remember -- Santa Monica or wherever we stayed that night, and, like,
7 approximately like when they were bought.

8 [REDACTED] Sorry, when was that?

9 The Witness. I'd have to look specifically, but it was --

10 BY [REDACTED]

11 Q As part of the bus tour --

12 A -- as part of the bus tour when we were starting out in California. So I think
13 it was actually the first night in California, so it would be the next morning when we woke
14 up is when he took one of the SUVs to go make that run for that.

15 BY [REDACTED]

16 Q And what month would this have been?

17 A This would be December.

18 Q Okay. And is it your understanding Kylie or Amy directed someone to go
19 get these phones?

20 A I don't know, but the way it's been represented to me is that they directed
21 this person to go get them.

22 Q All right. And who made this representation to you?

23 A The person who purchased them.

24 Q Okay. And you don't want to reveal who that person is?

25 A I mean, I imagine you guys are going to get to it at some point anyway. I'd

1 like to clear it with him, like -- he -- it's Scott Johnston.

2

BY [REDACTED]

3

Q And you had mentioned that Mr. Johnston was someone who had

4

volunteered as a car driver on the trip?

5

A Well, so he had volunteered -- he'd been a volunteer of Jen's and I for like

6

political stuff going way back. And we invited him, at first, just to come out when we

7

needed extra hands. He was initially to be, like, my personal assistant that handled my

8

incoming messages. He quickly was reassigned to like basically driving Kylie around and

9

helping her.

10

BY [REDACTED]

11

Q Just a follow-up on something you said earlier. You were talking about

12

your conversation with Ms. Wren at the Willard, and it seemed to me that you were

13

surprised that she had raised all this money, or she was representing that she raised

14

\$3 million for the Ellipse rally because you'd been working really hard to do your own

15

fundraising, because you understood Women for America First was in a cash crunch.

16

Do you have an understanding where that money for Women for America First

17

was going if it wasn't going to the Ellipse rally, or did you think Ms. Wren was just lying

18

that only her money was being used for the rally?

19

A I wasn't sure. At that point, my frustrations with Kylie Kremer especially,

20

like, had kind of reached a close to fever pitch anyway. So I was somewhat inclined to

21

believe, like, that something was happening there, but I wasn't sure.

22

And my biggest frustration was that in the cash crunch, like, I had agreed to take

23

less money, and I had also incurred extra -- like, I had started paying extra expenses,

24

picking up nights at the hotel and other things out of the money that I was under no

25

obligation to, because of that cash crunch. So I do remember being upset at the idea

1 that none of that money had been spent for the rally at the Ellipse.

2 Q You've mentioned the name Mercedes Schlapp a few times today. Can you
3 just clarify her involvement in the January 6th rally or, I guess, the bus tour?

4 A I don't know -- I honestly don't know if she had any involvement or how
5 much involvement. I just know that she was a -- somebody that Amy knew in Trump's
6 immediate orbit and had like communicated regularly with not just in this but in other
7 matters.

8 Q And is she, Ms. Schlapp, one of the people you said that you or Ms. Kremer
9 reached out to with concerns?

10 A I don't know that Amy reached out to -- but I remember when we were
11 sitting there talking about, like, who we could go to, Meadows was the obvious choice,
12 but Mercedes was another person whose name we brought up that she might contact
13 and reach out to.

14 Q And were there any others who were potential people to reach out to --

15 A The Trump family.

16 Q So that would be Donald, Jr. --

17 A Laura Trump specifically, I think Amy had the closest relationship with. As
18 far as the Trump family goes, it would be Laura. I also think she was in contact with
19 Don, Jr. But, yeah, I'm not 100 percent sure, just the family is kind of how we brought it
20 up, like kick this to whoever we've got to kick it to.

21

BY [REDACTED]

22 Q Do you know if Ms. Kremer raised the concern about Ali and Alex Jones and
23 their group to Mercedes Schlapp?

24 A I don't know to Mercedes. I don't know specifically. All I have is the text
25 message after the conversation where we decide to kick it up the food chain where she

1 says that the White House and the campaign are aware of the situation with Ali and
2 Cindy.

3 And it's also around the time that I'm helping the pastors negotiate the,
4 quote/unquote, "appeasement rally" because that's -- the introduction on that text starts
5 with Pastor Gibson, somebody has to -- like I can't remember exactly what it says, but
6 basically, like, tell Pastor Gibson to be careful who he talks to or whatever.

7 I have reached the campaign and the White House, and she's very specific that
8 both are aware of the situation with Ali and Cindy. And my take on it was, she had
9 kicked it up the food chain like we talked about, and it was handled, and I moved on to
10 dealing with other concerns.

11 Q We've been going now since lunch for about 2 hours. Are you good? Do
12 you want to take a break?

13 A Let's keep -- I'd rather keep knocking it out.

14 Q Sure, let's keep going.

15 So why don't we -- I understand from having read the text messages that you've
16 provided to us and your testimony today, I understand in general terms this appeasement
17 rally to have been an opportunity for some of the people with viewpoints you
18 disagree -- or messaging tactics you disagreed with, to share a space with other folks, the
19 pastors, and yours, and some other folks like you had mentioned.

20 Is there anything we haven't covered about the January 5th event that you think
21 stands out and is important for us to understand?

22 A There is two separate incidents that, in hindsight, seem more important than
23 we realized. At one point during the day we get a call from the press pen that there
24 is -- this is as it's described to us -- that there is a journalist here, like a credentialed
25 journalist here who has brought antifa as their security and are provoking the crowd and

1 somebody needs to come take care of it right away.

2 And Jen and a couple of the security guys go and take some pictures of the guys
3 and kind of clear it out, and it kind of goes away a little bit.

4 Later in the evening, during the Alex -- like the final Cindy Chafian portion of the
5 day, Grace Saldana from Right Side Broadcasting calls Jen in tears, like literally crying that
6 the same guy and same people are causing problems, have pushed their cameras over
7 and it's getting really intense.

8 And so we grab -- this time Jen and I grab Greg Kurbatoff, I think Jerry Anders, and
9 I think two other security guys, and head to, like, see what happened. When we get
10 there, there is a cameraman who is credentialed as NBC, who has clearly stirred some
11 stuff up because the -- there are members of the crowd like screaming at him, like, right,
12 like really, really intense situation.

13 Jen and I go into the press pen where his camera is. We pull him aside. We tell
14 him to pack his shit up and, right, like now. And I remember thinking, wow, the crowd is
15 going to tear this guy apart. And he's packing up like as quickly as he can. I think even
16 he got nervous at that point.

17 It also becomes clear that he's not really NBC News, right. So having extensive
18 relationships with the media, Jen and I start asking questions about who his producer is,
19 like who he works with, what branch he's in, blah, blah, blah. He can't provide any of
20 that or a business card or anything else. And clearly had provoked or tried to provoke
21 the crowd into doing something untoward.

22 And we ended up using security to escort, like, to walk him probably close to a
23 mile away from the event at Freedom Plaza until we were sure that no one was following
24 him and he could leave safely.

25 Subsequently in videos, we have seen some of the same characters we

1 encountered there at the Capitol on January 6th, and this is just in the videos. Like to be
2 clear, like we didn't see this in person, but we did recognize some of the same people that
3 we dealt with in that incident around the press pen at the Capitol in some of those
4 videos.

5 Q Okay. Any -- were you there for when Ali Alexander spoke at Freedom
6 Plaza?

7 A I was not there. Well, I should clarify, I was in the Willard. I got the call
8 from Grace. I'm not sure who was speaking. The only interaction I had with Ali on the
9 5th is that the pastors ran, I think, 5 minutes long, and they were doing like their -- they
10 wanted a couple extra minutes to finish their program.

11 And me and Pastor Gibson approached Ali to make sure that, like, Hey, we're
12 running a couple minutes long, we don't want it to be an issue. Are you okay with this?
13 And that was the one interaction I had with him.

14 Q So then tell us what your experience was on January 6th. Walk us through
15 your day.

16 A So I'm up almost all night. There's an issue. We had moved to set up a
17 stage at the Supreme Court just in case somehow something got sent to the
18 Supreme Court, like we'd be prepared there. There was some kind of issue setting up
19 there. I don't even remember really what it was. Then I had the late-night meeting
20 with Caroline, which, right, took us late into the hours. Then I was freaked out about
21 getting the VIPs in.

22 So the morning I get ready, I go downstairs. Our VIPs are kind of collected there
23 outside of the Willard. And it is a logistical mess to try to get to the gates properly.
24 And so, I spend most of the morning running people back and forth individually and
25 getting them through the line into security, and I'm literally the last of our VIP group into

1 the Ellipse.

2 Q Did you tell anybody else with Women for America First about the
3 conversation you had with Caroline?

4 A Yeah, I ended up telling everybody. That's why I told Amy, Kylie about it.
5 I told Jen. I told -- I probably told Keri and Scott. Like it -- it was so shocking to me
6 that, yeah, I made no secret about it.

7 Q Okay.

8 A Then, so I'm getting the VIPs in. I finally come in. It is really cold. And I
9 remember sitting there, and I walked around, talked to the other VIPs, took some
10 pictures, and then I sat in my chair and I actually nodded off briefly. They kept playing
11 the same annoying song, like three songs over and over and over again. And so I
12 remember feeling like just a sense of general annoyance.

13 And then the program was very frustrating. To steer it back, in the middle of all
14 this, I spent a considerable amount of time on what we call like the case that we were
15 going to present to the world that day, and it was supposed to start with, like, a rock-solid
16 hook of an opening statement, and what we were getting was the same general stuff that
17 we'd been hearing.

18 And I remember being especially disappointed in, like, the presentation from Rudy
19 Giuliani and John Eastman, in that -- because I kind of expected that to be like, oh, okay,
20 now, this is where we are going to get -- right, this is where we're going to get the facts
21 like we've been waiting for. And it was very generic, like very, very generic.

22 And by the time Trump gets up to speak, and it is way delayed, he's like 2 hours
23 late, something ridiculous, he gets up and he starts speaking. And I'm really kind of
24 getting disillusioned because his is even worse as far as like nothing new here. And I
25 remember turning to Jen and being like, is he really giving the same speech over again?

1 Like is that -- is this really all we're getting right here?

2 And so we keep watching. And then we hear him say, and then we are going to
3 walk to the Capitol. And I kind of like lost my shit, because to me, it was like a complete
4 betrayal of everything, like the appeasement rally, all the lead-up we had put in. It
5 meant that he had taken like the Ali/Alex side of stuff, like when I heard him say that.

6 And I was so angry, and Jen was so angry, right. And Jen who is Miss Trump girl,
7 like if you look at her Instagram, like, right, she's like the Trump pinup and goes back, you
8 know, to like 2010, 2011 with him personally. And she was calling him like
9 motherfucker and like -- I'm sorry. I'm just relaying it as I remember it. And I
10 remember turning and being like, let's get the fuck out of here.

11 And so we went to secure -- went to RMS. I believe Greg Kurbatoff took us in a
12 golf cart back to the Willard. I went up to the room. I ordered room service. I ate
13 the burger, and I went unconscious. And maybe 4:30, 5:00ish Jen wakes me up and she
14 says, all hell has broken loose. They've overtaken the Capitol, and a bunch of people are
15 dead.

16 And I just -- I remember like my stomach just dropping. And the first thing I did
17 was account for every member of our staff, so, right, I individually make sure that
18 everybody on the staff is accounted for. And then I go down to the suite where -- right,
19 the big suite, and I immediately start talking about how we denounce what's going on
20 here, like how we provide some -- that this is going to ruin us forever, that we are forever
21 going to be tarnished by the violence that has happened here unless we scream from
22 every mountaintop to every person who will listen that that's not us, that's not what we
23 believe in, we can't do this.

24 And so -- yeah, so Amy is not -- right, is not happy, like, no, I think we need
25 to -- well, let's get Chris on the phone, Chris Barone, the media guy, let's get him on the

1 phone and maybe we'll put a statement out. And I am -- I'm freaked at this point.
2 Like, I can see how this plays out for us in just our lives, right. All this great stuff we did,
3 that we are frankly really proud of, and now we're going to be known as these violent
4 assholes forever.

5 And, so, I start really, really pushing hard. And me and Jen independently
6 start -- I put some of these text threads, even though they're with journalists, in it to back
7 up this part of the story. Like we reach out to our senior producers at CBS. We're
8 lining up interviews. We're setting up a press conference at the Ellipse the next day.
9 We want to do it earlier. Eventually, we keep pushing it back because she's talking to
10 the lawyers and other people. And eventually we're told that Katrina says no press, the
11 lawyers say no press, and the statement will just have to be enough at this point.

12 And I remember it was so bad I was downstairs at the Willard like smoking a
13 cigarette and Lyndon was out there. And, right, the security guys don't get involved in
14 like the internal stuff. And I remember, like, he came over to try to like calm me down,
15 because I was like angrily pacing around, and he said -- right, he's like you know you're
16 right that you guys have -- like you guys are in -- you guys need to do this bad.

17 And I recruited him to come up and like try to even back me up. Like at that
18 point I was so desperate to get across the finish line, and I continued to fight to do the
19 press conference where we took every question from everybody, right, to make it clear,
20 we don't know who those people are, right.

21 And there was an early sense from a lot of people even including Jen like, oh, this
22 was a, you know, antifa or Black Lives Matter, we don't know any of that at this point.
23 All we know is that was not us, like we did the peaceful thing over here with like 1 million
24 people. That's something completely separate and we have to do it.

25 And right up until -- like, we are scheduled to do an interview with Tony Dokoupil

1 at CBS at like 1:30, and then we are going to do the press conference at 3:00. Like we
2 kept pushing the times back as kind of a -- on the 7th. And word comes back that we
3 can't do it. The lawyers are saying no. The White House is saying no. And that ends
4 up leading to like what has been a continued falling out between us and the Kremers.

5 Q When you say the White House is saying no, do you mean Katrina Pierson on
6 behalf of the White House, or is there actually direct communication from the
7 White House?

8 A I remember it, and there's a -- it's been a while, and it was a very emotional
9 time. But the -- there is a text, clearly it's Katrina. So I know for sure it's Katrina, and I
10 remember being told that the White House said no press, but I did not see that reflected
11 in the messages anywhere.

12 Q So as you've explained today, and I think you've been quoted in the media,
13 your expectation was a single event that would start and stay at the Ellipse?

14 A Correct.

15 Q And when you talk about feeling betrayed when the President says to go
16 down -- that we're going to march to the Capitol, you understood that as buying into this
17 Capitol grounds production that Ali Alexander's group wanted to put together?

18 A I also know -- the reason I was the lead organizer on things like logistics and
19 security at the -- all of these different events, is that I understand how to manage a large
20 crowd. And to be honest, the most effective way is through a professional sound
21 system, and an emcee who knows what the hell they're doing, right. That's number
22 one.

23 Then you have the different layers of security and on and on. I knew none of
24 that was in place. I also knew that the permit expressly forbid an organized march to
25 the Capitol, like expressly. And so, that was -- it was -- it really was like just a -- like a

1 complete deflation. Like I hadn't slept. It was cold. And I just remember like almost
2 wanting to cry, like I was so upset about it.

3 Q So help me understand then this setup at the Supreme Court on January 6th,
4 because it seems like there might be some tension between assuming it's an all-day event
5 at the Ellipse, and at the same time -- and there's even -- we can look at exhibit 9, at page
6 23. This is the March For Trump II text thread. And you're writing on, and I can -- we
7 can flip back a page or two to see that this is on January 6th, "My Supreme Court
8 volunteers from 8:00 to 10:00 a.m. appear to have bailed on me. I don't know what to
9 do but go myself." So what was this idea of having a stage or something set up at the
10 Supreme Court on January 6th?

11 A Well, and I also advocated by the way, I really wanted to have a stage at the
12 Capitol as well, because, right, my assumption of what was going to happen that day,
13 what I understand procedurally, was that the main action was going to be at the Capitol
14 and at the Ellipse.

15 There was also a possibility that some issue had to be resolved by the
16 Supreme Court. And if a large crowd was going to move to the Supreme Court, I wanted
17 to make sure that we had a stage available there to like manage that.

18 And in the same way that the Capitol got overrun that day because there wasn't
19 these procedures in place, there wasn't a stage, there wasn't a sound system, there
20 wasn't security, if on the off chance that something got kicked to the Supreme Court and
21 that was where, like the crowd had to move for some reason, I wanted to make sure that
22 there was something in place there to kind of maintain order, and also as a secondary
23 backup if we needed a venue for people who got denied last-minute speaking at the
24 Ellipse rally.

25 Q So when you say something gets kicked to the Supreme Court, do you mean

1 like actually in the vain of like a legal objection that the court would have to resolve?

2 A Yeah, so if -- an example, as it was brought up, is that somehow, one of the
3 States tries to certify an alternate slate of electors and, right, there's some kind of -- it's
4 not out of the question that the Supreme Court could be asked to resolve one of those
5 issues. And in that scenario, the assumption would be that there would be people
6 moving to there.

7 I'd also advocated fiercely for us to set up a similar setup at the Capitol, so that it
8 would be in place if that happened. And so, the Supreme Court stage, they're, A, we
9 never end up using it for anything for obvious reasons, but it was kind of a backup plan
10 for both if something happened there and if we needed a secondary stage for people who
11 got denied speaking at the Ellipse anyway; and two, one of the things in the Bonnie and
12 Clyde article that was most important to me when I read it and that I hadn't realized is
13 that I had told David Friedlander on the record on the 5th that the plan was to stay at the
14 Ellipse all day on the 6th.

15 And because I understand, less with the Supreme Court but more with the Capitol,
16 that as things played out that it's somewhat -- it comes across as somewhat incredulous
17 that that's what we believed, especially because the President ended up directing people
18 away from what we thought was going to happen.

19 Q So, but it sounds like what you're saying is this idea of having a stage at the
20 Supreme Court was a contingency?

21 A It was, yes.

22 Q It was not, in your view, an actual for-sure event that was going to happen?

23 A Correct.

24 Q Okay. Pastor Brian responded to this, he said, "The Viking is handling it.
25 We got you."

1 A Yes.

2 Q Do you know what he's referring to?

3 A Yeah, so Pastor Jordan Kreisle, who was another one of the pastors involved,
4 we refer to him as the Viking, the volunteers who were supposed to hold the stage for me
5 from 8:00 to 10:00 had not showed. I was going to go to it myself, and Pastor Kreisle
6 volunteered to take a couple of people they knew to go handle it for me.

7 Q Okay. And then when he says, "Don't let him do it," and Pastor Brian says,
8 "Not him. One of out of guys that came to serve."

9 A Correct. So Pastor Jordan was kind of like -- he was a regular part, he had
10 done a lot of work. I didn't want to see -- I didn't want him to miss out on the event at
11 the Ellipse, and so, when I say don't let him do it, I'm saying don't make the pastor -- the
12 Viking pastor, as we friendly refer to him, don't let him do it because like he's earned
13 being at the event at the Ellipse. And Pastor Gibson says, no, I'm not going to send him
14 specifically, but like some of his under guys to go make sure that they hold the stage
15 down from that 8:00 to 10:00 period. And then after 10:00, that's when we have
16 professional security show up there.

17 Q So further down on this same page, on exhibit 9, page 23, Keri Morgan
18 Warner texts, "Ali trying to rearrange our Women for America seats." And then your
19 response is, "Stop that shit. Is Amy at the stage?!?" Did you witness this kerfuffle over
20 the seating at the Ellipse rally?

21 A I did not because I was still sherpa'ing VIPs like between the Willard and the
22 entrance, but I was getting regular communication -- the people who did witness it were
23 Keri and Jen and Jennifer Hulsey and Greg Kurbatoff, and I think maybe Lyndon or Zack, I
24 can't remember, but one of the two leadership guys at RMS.

25 Q And it's also my understanding that there was a pretty pointed conflict

1 between Caroline Wren and Kylie that morning. Were you there for that?

2 A I was at the Ellipse. I did not witness it, but there is -- I can't remember in
3 which one of these it's in, but there is -- where Kylie tells me that I believe her and Katrina
4 called like to have Caroline arrested. It reached like that level of whatever. So that
5 definitely was.

6 And then I do remember saying, like, I can't remember which agency they were
7 with. But I do remember law enforcement like going up to Caroline and having a
8 discussion, and then I think they went over and talked to Katrina, and then they kind of
9 just left.

10 Q Did Caroline Wren talk to you at all about events happening on the Capitol
11 Grounds on January 6th?

12 A No. So all she told me was that she had -- she had -- that she had -- that
13 she was -- and she didn't -- she said it by saying the reason I've -- do you want to know
14 why I advocated so hard for Ali and Alex? And that was kind of the extent of it. She
15 did not mention like the march or anything at the Capitol other than the Ellipse rally and
16 then just really bashing the Kremers to me.

17

BY [REDACTED]

18 Q I want to go back to a little bit ago when you were talking about what
19 Ms. Wren said to you about why she liked Mr. Jones and Ali Alexander, and I think you
20 said something to the effect of like they believed the mission or something like that.
21 What was your understanding of the mission?

22 A As she put it, every time I call them, just -- I remember it pretty vividly,
23 because it was so ridiculous, but every time I call them, it's what can we do to help, what
24 can we do for President Trump, like how can advance the mission. And the Kremers are
25 just all about self-promotion, and she's not wrong necessarily about like one side of that.

1 But trying to pass off that a person who I think has a messiah complex is like the most
2 selfless person like going, like just rang as so ridiculously un-genuine that it was
3 somewhat hard to believe.

4 Q So the mission being, like, whatever it takes to promote Trump?

5 A Yeah.

6 Q Okay.

7 A I mean, I didn't really delve into it.

8 Q When you mentioned you were sherpa'ing, in your words, between, I think,
9 the Willard and the Ellipse on January 6th, were you taking folks in the golf carts, or were
10 you walking back and forth?

11 A Initially, we were in the golf carts. Eventually, one of the golf carts basically
12 got swallowed by the crowd and we -- like we took the key and abandoned it temporarily
13 and kind of brought people in one by one from that point on.

14 Q We've seen videos of folks associated with Ms. Chafian and on golf carts.
15 Do you know, were those your golf carts or someone else's golf carts?

16 A Cindy had always been the point of contact like with the golf carts. And, in
17 fact, on January 5th, I had to -- we needed Cindy to sign off on allowing the bus into the
18 perimeter. And she had kind of been, like because of the conflict with the Kremers, like
19 had initially denied letting the bus like get into the perimeter to come park at the Willard.
20 And so, I had to personally go up to, like, their suite and ask her to please, like please, just
21 let the fucking bus in, like please.

22 And she did do that, and she also offered me a golf cart that I ended up not using.
23 She ends up -- there's a later thread where she asked me about the keys. I tell her I
24 never ended up taking it. But we definitely had our own golf carts that day and she also
25 had some.

1 [4:02 p.m.]

2

BY [REDACTED]

3

4

5

6

Q I think you had mentioned -- testified earlier that, during that conversation with Ms. Wren on January 5th, she said that she was going to give you and Ms. Lawrence some VIPs but no one else. How did you end up getting the VIP passes for the other VIPs associated with the Kremers?

7

8

A We actually never got the VIP passes. We ended up using these cheap paper wristbands as kind of a first attempt.

9

10

11

12

And then what we ended up doing is putting, I believe, Jennifer Halsey and -- I believe it was Jennifer Halsey and maybe her daughter Katie. Anyway, Jennifer, who had a list of our people, was standing there at the VIP entrance, you know, "Yes, that's one of our people; you can let them through."

13

14

15

16

And so we kind of had to do an ad hoc system, because she never delivered -- and, I mean, I could physically see them in the room. She had a big stack of them that she hadn't passed out. So we ended up having to do kind of, like, an ad hoc system to get people in.

17

18

19

Q And do you know who prepared the VIP list for the Kremers for January 6th?

A I think, at one point, I think it was Keri Morgan -- a combination of Keri and Jen, my fiancée.

20

21

Q Did you ever review the VIP list?

A Yeah, I'm sure I did.

22

23

Q Do you recall seeing members of the Proud Boys on any versions of the Women for America First VIP list?

24

A I don't. I think that would've stood out to me.

25

I do remember at one point on the room list there was -- like, we caught that

1 there were a bunch of people. Like, there were some Alex Jones and Roger Stone
2 people, like, on our VIP room block that we were like, how on Earth? And the
3 assumption we came to was that Cindy had put them on our block at some time
4 previously.

5 [Discussion off the record.]

6 The Witness. Oh, yeah, no, that there were definitely people who had been
7 openly attacking us and unfriendly on our room list, like, on our room block at the Willard
8 that needed to be removed.

9

BY [REDACTED]

10 Q Do you know how they got on that list?

11 A We assume it was Cindy Chafian, because, before, like, the breakup, if you
12 will, she was the one handling, like, the communication with the Willard. So we're
13 assuming that's where it came from.

14 Q Quickly, I wanted to go back to what you were saying about January 5th and
15 there was an individual who represented themselves to be associated with NBC and then
16 you learned that was not the case. Did you meet that person?

17 A I did, yes.

18 Q Did you get their name?

19 A No. So I -- one of the red flags was that he refused to provide a card.

20 Anyway, we do have pictures. Like, Jen has a picture from both the morning and, I
21 think, the evening, like, confrontation that we had with him. And it's one of the things
22 that we will continue to upload as we try to get a handle on all this.

23 Q And so you intend to produce the photos?

24 A Yes.

25 Can we get into that a little bit?

1 Mr. Nass. Yeah, yeah.

2 The Witness. So, to be clear, like, what I've provided to this point is by no means
3 exhaustive to what's responsive to the subpoena. I did have a family emergency with
4 one of my daughters that caused us to drive across the country, like, right around
5 Thanksgiving. And then we had some technical issues accessing the -- like, I'm using a
6 different phone now than I was before. So we had some technical difficulty, like, getting
7 to that.

8 Our intention -- and, frankly, we wrestled with how we were going to handle, like,
9 our cooperation. Our intention is to cooperate with 100 percent transparency. And
10 both Jen and I intend to continue to go through all the stuff and upload it.

11 There's a lot of it, right, because there's Facebook messages in some cases that
12 are relevant. There's pictures and video and texts. And so we are -- I want to make it
13 clear that our intention is to quickly, without delay, as soon as we get done with this, to
14 continue to upload things that -- anything that would be responsive.

15 Mr. Nass. And I know we're on the record, but, Kevin and Alejandra, you just
16 should know -- and I know you alluded to it earlier -- there was a tremendous amount of
17 information that was uploaded prior to him getting here with me. I believe this is
18 actually it in print form.

19 The Witness. This is a lot of it. I also, because -- I wanted to make sure that
20 there was a good-faith effort seen, with all of the things that have played out in the press
21 and otherwise. So, despite my reservations, like, I took -- I uploaded a file that I got
22 from Google that's all of my emails, like, personal included, that I didn't necessarily sort
23 from the time period listed, that I just turned over ad hoc. My hope is that any, like, of
24 the donor information that might be included would be handled with --

25 Mr. Nass. In confidence.

1 The Witness. -- courtesy.

2 [REDACTED] Yeah, we appreciate that. And we are planning to address some of
3 the nuts and bolts of the production thus far. At least, we can handle a lot of that off
4 the record, not as part of the deposition.

5 The Witness. Sure.

6 [REDACTED] We do want to ask just a couple of questions, just sort of, like, what
7 kinds of categories of information we might be expecting moving forward.

8 The Witness. Sure.

9 [REDACTED] Before we get there, though, let's make sure that we've covered
10 whatever substantive questions we might still have about your testimony today.

11 Do you have any other followups?

12 [REDACTED] Can we take a couple minutes?

13 [REDACTED] Yeah. Sure. Is that --

14 The Witness. I wouldn't mind a smoke break.

15 [REDACTED] Why don't we take -- how long do you need?

16 The Witness. Like, 5 minutes.

17 [REDACTED] Yeah, let's give it 10 minutes, and let's get back here maybe at 4:20.

18 [REDACTED] Off the record.

19 [Recess.]

20 [REDACTED] All right. Let's go back on the record.

21 BY [REDACTED]

22 Q Mr. Stockton, we really only just have a handful of things left to talk about,
23 so I don't expect that we're going to keep you here much longer today.

24 One of the print publications that you gave an interview to or commented on, I
25 think you indicated that you had been interviewed by law enforcement following January

1 6th. Can you tell us about that?

2 A Yeah. So in I believe it was February, February or March, I got a call from
3 the local FBI field office in Reno that started very generically. They said, "Ah, you know,
4 we have reports that you were in D.C. on January 6th." And I kind of chuckled and I said,
5 you know, "I assume or I hope that you're aware that, like, I was an organizer of these
6 events and was intimately involved in them." I probably spoke to him for maybe 10 or
7 15 minutes.

8 Q Was that the full -- was that the only time that you had a conversation with
9 law enforcement?

10 A That is the extent of my conversations about January 6th with law
11 enforcement.

12 Q Okay. And what questions was the FBI agent asking you?

13 A Essentially, primarily whether I was at the Capitol, whether I ever went to
14 the Capitol, what my movements on that day were.

15 Q And it's my understanding from what you've said today and also other
16 interviews, you did not go to the Capitol on January 6th.

17 A Nah. I went from the Ellipse to the Willard, and then I went to sleep. And
18 the farthest I got outside the Willard was, like, right outside to smoke a cigarette a couple
19 times.

20 Q So did the FBI agent ask you about other people or use any other names of
21 other individuals during this conversation?

22 A Not that I recall. It was very generic. It seemed like they were -- they
23 represented that they were just going through the tip line. They also sounded
24 frustrated, like, that they had been making lots of calls. They did not appear to be
25 aware that, like, I had a different level of involvement, like, as far as, like, all the stuff

1 we've been discussing.

2 Q Understood.

3 So one other thing I want to ask you about, regarding public source information.
4 In that first Rolling Stone article we started on this morning, Hunter Walker wrote that he
5 had spoken to sources who claimed, quote, "to have been concerned about drawing
6 people to the area directly adjacent to the Capitol on January 6th, given the anger among
7 Trump supporters about the electoral certification that was underway that day," end of
8 quote.

9 Were you one of these people who had that specific concern?

10 A I don't know if he's referring to me specifically there. I definitely did have
11 concern before -- and as soon as -- one of the first things I thought when I heard Trump
12 say, walk down there, was that they weren't set up for that.

13 Q And the concern about not being set up for that, did that relate to people
14 being --

15 A Yeah. If you're going to direct a bunch of people to go somewhere that
16 are, frankly, like -- there's all this tension and anger and bad element, right? Like, I'd say
17 99 percent of the people who were there are good, decent people, right, but there were
18 elements that were troublemakers. And that's manageable if you do things to manage
19 it, and I knew that none of that was in place.

20 Q In terms of elements or bad elements, I think you may be aware that there's
21 a group of people associated with the Oath Keepers who have been charged for conduct
22 on the Capitol that day. Are you aware of that?

23 A I am aware of that, yes.

24 Q On January 5th and 6th, in that timeframe, did you have any interactions
25 with Oath Keepers or people who were associated with the Oath Keepers?

1 A Yes.

2 So, during the January 5th rally, it was the only time that I had personal
3 protection. So I had two guys assigned to my personal security detail for the day.

4 Zach Rugen, one of the RMS guys, had tried to come over during, I believe, the
5 prayer portion of the, what I call the appeasement rally. And some -- I believe they
6 were Oath Keepers, like, some tac'ed-up guys, like, had given him a hard time about
7 getting -- I had to come over.

8 And, even still, like, because he didn't have a credential or whatever -- like, even
9 the guy, like, one of the senior guys on the real security team, like, was prevented from
10 coming in for a bit until I went and got him a credential. So --

11 Q When you say you had personal security detail, was that from RMS?

12 A It was from RMS, yes.

13 Q When you were at the Ellipse, did you see people who were wearing tactical
14 gear?

15 A Not in the -- so, kind of on the outskirts, but I didn't really see anyone in the
16 VIP in the tactical gear.

17 Q There's been public source information and reporting on Alex Jones and Ali
18 Alexander purporting to lead a march down Pennsylvania Avenue from the Ellipse. Did
19 you know that that was something that was being coordinated ahead of time?

20 A I did not. I knew that -- my extent of what I saw was just the, like, public
21 stuff that they had been promoting. There was a flier I remember specifically Matt
22 Couch tweeted out, because he was friend of mine, and I remember confronting him
23 about it specifically, that said, like, event at the Ellipse at 10:00 or 11:00 or whatever it
24 was, and then, 2, 3 o'clock, right, event at the Capitol.

25 And I didn't even put it together, like, people moving from one to the other at that

1 point. I just got on the phone with him and was like, "No, that's not going to happen."

2 I told David Jay Harris the same thing. Like, despite what you may have heard,
3 like, we have the only permits in D.C. on the 6th. Like, there will be -- I mean, I was
4 adamant about it with lots of people that, like, no, because, frankly, it seemed impossible
5 to me that that would happen.

6 Q And, unfortunately, I don't have an example here for you, but we have seen
7 a graphic that sort of presents Freedom Plaza on January 5th, Ellipse the morning of
8 January 6th, Capitol Grounds afternoon of January 6th in a single sort of --

9 A I believe that's the graphic I'm referring to.

10 Q But, if I understand you correctly, you seeing that thought what? That that
11 was Ali Alexander trying to reshape things for his own purposes? Or what was your
12 reaction to seeing that graphic?

13 A My reaction was that Ali was violating -- was already -- because this was,
14 like, within a day or two of us first, like -- first reluctantly agreeing to help them do the
15 January 5th thing, to, like, this guy is already violating, like, the agreement that we put
16 together. And so my assumption is, it was him just going rogue.

17 I've since come to think that I may have been wrong about that. But, at the time,
18 my assumption was that it was just him continuing to be uncontrollable and the same
19 kind of crap we'd been dealing with with him throughout the whole process.

20 Q Because -- and, just to clarify, you've been -- when we talk about the
21 appeasement rally, in your words, your shorthand for it, if I understood you correctly,
22 that appeasement was Ali Alexander and Alex Jones and Roger Stone and their circle
23 agreeing to participate in a January 5th Freedom Plaza event so that the only January 6th
24 event was the Ellipse event.

25 A Correct. I mean, that wasn't only it, right? It was to provide, not just

1 them, but other people who had worked, make sure that they also -- like the
2 pastors -- would have a platform to, like, give the speeches and do the programs that they
3 wanted to. We wanted to make sure that -- or, like, the MAGA rapper guys, right, that
4 they'd have a stage to perform on so that they would get the content that they wanted,
5 as a show of appreciation for the work they had put in.

6 Q Okay.

7

BY [REDACTED]

8 Q Did you or the Kremers ever confront Ali Alexander about his representation
9 or the graphics he was putting out there that seemed to tie the event on January 5th
10 through January 6th and that it would start on the Ellipse and end up at the Capitol?

11 A I don't believe we ever confronted Ali directly. I actually don't think,
12 outside of that really short interaction between when the pastors handed the stage over
13 to Ali on January 5th, that any of us had any contact, outside of that text thread with
14 Cindy and Pastor Brian, where we -- right, that was for the purpose of January 5th.

15 Q You mentioned a bit ago that you've since come to believe that you might
16 have been wrong about Ali Alexander going rogue. Can you just explain what you mean,
17 that you might be wrong about that?

18 A So my assumption was that Ali was just blustering and that there was no way
19 on God's green Earth that the White House of the United States of America would
20 coordinate with somebody like Ali Alexander to do anything, much less something of the
21 magnitude of, like, the crowd we had on January 6th.

22 Having watched everything since, and including the subpoenas that were issued
23 after his deposition, reading between the lines, I kind of think now that he probably was
24 communicating with people at the White House.

25 And I think that it kind of pieced together -- like, Alex Jones has talked a lot about

1 Secret Service coming to get him early, which I remember being Caroline Wren and Cindy
2 Chafian, like, pulling that group, like, out of the VIP section a little early. I remember us,
3 like, taking note of them leaving, like, as kind of odd.

4 And it really wasn't until, like, I saw the subpoenas afterwards that kind of led me
5 to believe that Ali probably produced enough receipts to make that connection, like, to
6 show that he really wasn't lying about that, which is, frankly, astonishing to me.

7 Q And when you're referring to subpoenas, do you mean subpoenas from the
8 select committee?

9 A Yes. So I saw, the day after Ali testified, Ed Martin, who I saw several times
10 with Ali, and then there was a list of others that kind of connected some dots, like, in my
11 head that, yeah, he probably actually was -- right, that there probably was White House
12 involvement.

13 It's also led me to question whether Kylie, like, had kept that information from me
14 too. Like, I don't know where, necessarily, the breakdown in communication happened.
15 Because, like, you brought up some of the public things I've said to the media where
16 I -- and thank God I told David the day before, right, so that I was on the record the day
17 before, and I've been consistent about it.

18 But it makes me look out of touch and foolish that I thought everyone was staying
19 at the Ellipse unless there was, like, these unlikely contingencies of, like, the Supreme
20 Court weighing in somehow; that I was so out of the loop on what was really being put
21 together.

22 Q Would you group Alex Jones with Ali Alexander as for January 6th and who
23 could've potentially been having other conversations? Would Alex Jones be in that
24 category too?

25 A From the conversation I had with Alex Jones on the night, like, January

1 4th-January 5th that I described earlier and then what I've watched since, I believe, for as
2 ridiculous as he is sometimes, I think Alex Jones was kind of duped into his role of stuff.
3 I don't think that he -- and this is just me talking about -- like, having processed
4 post-everything and then during, I don't think Alex Jones intended causing the violence or
5 doing the violence. I think he was more being set up to be used as, like, a patsy.

6

BY [REDACTED]

7 Q But you I think said that you have heard Alex Jones say he was taken out of
8 the Ellipse by Secret Service --

9 A Yes.

10 Q -- but you witnessed Caroline Wren and Cindy Chafian come and gather him
11 to leave the Ellipse early.

12 A I do remember it being Cindy and Caroline who pulled him and Alex and, like,
13 a couple of people with them, like, out of the VIP.

14

BY [REDACTED]

15 Q And what about Roger Stone?

16 A Roger -- so I don't remember seeing Roger at all on January 6th. I
17 remember seeing him on the 5th, but I don't remember seeing him at all on the 6th.

18 Q Did you have any involvement in what has been coined or has been
19 referenced in the press with the "war room" at the Willard?

20 A So there were several war rooms. So Women for America First, we had our
21 suite. Rudy Giuliani and John Eastman had a suite that I visited briefly a couple times.
22 The Chafian/1AP had a suite on a different floor. I think Flynn had a suite on a different
23 floor. So there were big suites in several places, and, at one point or another, I was in
24 probably all of them.

25 I remember, I mentioned, when I had to ask Cindy on January 5th to allow the

1 buses in, I remember walking into that room and thinking that it had a very military feel,
2 right? There were maps and people on computers, right, like, and it had a very different
3 feel.

4 I didn't go into the Rudy suite until afterwards, and that felt very -- it felt like
5 walking into an investigation room. Like, they had a place set up where they were
6 interviewing people. And they kind of had, like, a big table with papers spread
7 everywhere. It seemed like they were trying to get to the bottom of, like, what
8 happened post-January 6th.

9

BY [REDACTED]

10 Q So, yeah, when you say you went to the Giuliani suite after everything, you
11 mean --

12 A After January 6th.

13 Q Okay. You didn't go into that suite before the insurrection had already
14 happened.

15 A No.

16 And the one time that I spoke with Bannon briefly was the 4th or the 5th. Late
17 at night on the 4th or the 5th, I was outside smoking. And Boris Epshteyn had come out,
18 looking very unhappy. And then Steve had followed him out. And it looked like they
19 had had, like, some kind of -- like, some kind of conversation that Boris wasn't happy
20 with.

21 But, yeah, beforehand, I was never in until afterwards, when Giuliani was doing
22 the, kind of, like, post-game investigation-type stuff.

23 Q What led you to go to the Giuliani suite?

24 A Millie Weaver, who was super-helpful to me through all this, and Patrick
25 Bergy and, to a lesser extent, Funes, had been, and I can't remember her real name, TOR

1 (ph) -- a bunch of people that I had been interacting with were involved in that. And I
2 provided them some Facebook messages between me and James Sullivan, because
3 the John Sullivan/Jayden X footage would play -- was very disturbing.

4 Q And are you referring to the footage of Ashli Babbitt being shot?

5 A All -- so he accidentally uploaded all his raw footage to YouTube, and it was
6 for a short time available. And all of that available -- like, it's mostly been banned, but
7 you can still get it on BitChute and a couple other places. But that raw footage, it's hard
8 to square what's in it.

9 Q What do you mean, "it's hard to square what's in it"?

10 A I mean, it just -- the -- there were lots of things about it.

11 And then my interactions with James Sullivan, which were troubling, to say the
12 least. He had reached out by Facebook demanding that we give him our stage for a
13 portion of the rallies. And, anyway, it was not a friendly-type deal. He had threatened
14 to, like, label us racists if we didn't cave to his demands. He had intimated that Robert
15 Mercer was the one funding him, thinking that -- I think he thought that that would have
16 persuasion over me because of my long-term relationship there.

17 So that it was his brother who was kind of on the front lines of -- right? You can
18 see John Sullivan clearly egging people on. When him and the other girl make it into the
19 Rotunda, they're talking about, "This could be the best video ever," the Ashli Babbitt
20 video. The speed of which that video got into the hands of the news media, I
21 mean -- and it plays into the worst of the conspiracy theory stuff of people like me and
22 people around me.

23 Q I'm still not sure exactly what you mean by that, the concern about saying it
24 was hard to square that footage. Against what? Like, in what way did that footage
25 skew against what you understood to be the truth?

1 A Well, so the raw and complete video, have you watched it?

2 Q No.

3 A I mean, it's not something I think is appropriate or helpful for me to
4 comment on, because it's not something I have firsthand knowledge of, but it should be a
5 centerpiece of any investigation.

6 Q Well, I guess I'm just trying to understand, in which direction is it skewing?
7 Is it skewing towards this makes the President's supporters look very bad in the face of
8 what's happening? Or does it support the notions of -- you know, there's been
9 suppositions of false flag operations.

10 I'm just asking you, in your opinion, when you say it's hard to square that footage,
11 I don't know what you mean.

12 A So what's clear is that there were paramilitary groups who were directing
13 the crowd and instigating a lot of the violence that day. In the videos I've watched, they
14 wear orange, right, there's identifiable markings.

15 From my time working undercover in some of these anarchist groups, like,
16 globally, I've been exposed to tactically how they use flags to direct and communicate in
17 large crowds of these type. I can see those things in the footage that I've watched of
18 the Capitol since.

19 And my sincere hope is that -- I don't know if -- I honestly don't know if they're
20 foreign actors or -- but it's clear to me that there was a well-funded, well-paid group of
21 probably 50ish who were intent specifically on causing violence and chaos that day. And
22 they were aided and abetted by a bunch of assholes from the Proud Boys and some of
23 these other groups.

24 But it's clear to me that there is -- that there was a paramilitary group that was
25 well-trained at moving a crowd. And it wouldn't take a lot of people to kind of -- to

1 steer that, especially in the absence of the kind of security procedures that we used at
2 every other event.

3 So, one of the hard things for me is that: We called all these people to D.C. and
4 to our rallies around the country. We stopped a Molotov cocktail attack at an event in
5 Nashville. We stopped several attacks that were happening. We provided universally
6 safe times for people during the official events, like, the times we were responsible for.
7 I'm very proud of that. I was given no control or no say over just one thing that
8 happened in D.C. in this time period we're talking about, and it's the Capitol on January
9 6th. And it hurt a lot of people. And it's been really terrible.

10 Q Yeah. And I can tell -- I get the sense of your emotion in that.

11 How do we square what you've just said about the sense of a well-funded
12 operation to sow chaos against the concerns about the followers of -- the rhetoric being
13 used by Ali Alexander and Alex Jones as creating opportunities for violence? Are those
14 in parallel with each other, or are they two different things?

15 A I've described it like this: I believe they ran headfirst into a trap. That,
16 because of their lack of organizing, right -- and when I get to that they weren't capable of
17 handling an event of that magnitude, that's what I'm getting at.

18 I think that they took the rowdiest elements; they ran them directly into this, like,
19 group that wanted to sow chaos and create doubt in our American system, tarnish all of
20 the rest of us. I don't know exactly what the motivations are. But I believe they ran
21 the worst and most aggressive elements within, like, the people who had come, and I
22 think they ran them directly into a trap to cause these fights with the Capitol Police and
23 sow this chaos.

24 One of the, like, big things for me coming forward with this, I feel like the people,
25 the overwhelming majority of people, who showed up to all these different things and

1 never did any violence, never caused any problems for anybody, I think it's important that
2 their voices be represented.

3 And I can't -- I can't say specifically. Like, this is just me theorizing based on the
4 information I've taken in. But I believe somebody recognized that these people were
5 kind of running the most angry, toxic elements of, like, who the crowd would be, and they
6 steered them towards the Capitol, where professionals were prepared to, like, lead them
7 into all the violence that occurred.

8

BY [REDACTED]

9 Q So I just want to be clear, though. You didn't go to the Capitol on the 6th?

10 A I did not go.

11 Q And you weren't talking to Ali Alexander on the 6th about where to go, what
12 to do, where to lead people?

13 A No, not at all.

14 Q Okay. And you didn't have any involvement or conversations with any sort
15 of organized groups to go to the Capitol on the 6th?

16 A Absolutely not, no.

17 Q I'm not sure I caught this if you answered the question, so, pardon me, I
18 want to ask it again. Why was it that you went to Mr. Giuliani's and Mr. Eastman's suite
19 at the Willard, I think it was post-January 6th?

20 A Millie Weaver -- I believe it was Millie, but somebody in Millie's group had
21 reached out to me and said that they were doing interviews about what had happened
22 and that they wanted to see if I'd be willing to share the conversations I had had with
23 James Sullivan leading up to it.

24 Q So, when you went to Mr. Giuliani and Mr. Eastman's suite, it didn't have
25 anything to do with, like, their election fraud litigation?

1 A Nah, nah, nah. This is after the 6th, like, the 7th or the 8th. And I was
2 there for maybe 10 minutes. I pulled up the Facebook chats with James Sullivan. And
3 then Millie ended up using those in the documentary she created that was -- that I
4 recognize as being largely filmed from that suite.

5 Q And I believe you mentioned that you understood that Mr. Flynn also had a
6 suite at the Willard?

7 A I think so, yes.

8 Q Did you go to that suite at any point?

9 A I think -- I don't -- I can't recall if I went to that suite. I had a -- because of
10 the morning of December 12th, I'd kind of had a contentious relationship with Flynn. I'd
11 also had a somewhat confrontational relationship with Patrick Byrne, who I also associate
12 as, like, that group.

13 A And I may have at one point -- at one point, I sat down with Byrne, and Flynn kind
14 of stopped by. I don't remember exactly where we were when it happened. It may
15 have been at the Trump; it may have been at the Willard.

16 Q When you testified earlier that, I don't know if it was one or multiple of
17 these war rooms at the Willard had a military feel, which rooms were you describing
18 specifically?

19 A Specifically, the Cindy Chafian and 1AP room.

20 Q Okay. And what do you recall seeing in that room that gave you that feel?

21 A Like, the maps on the wall. I think there were -- there was, like, I want to
22 say it was maps, but there was definitely, like, paper up on the wall and, like, what looked
23 like military-type comms with people on the computers, right, and earpiece -- right?
24 Just walkie-talkie-charging-stations-type stuff.

25 A That -- and I'm not sure that's exactly -- right? Like, I was only in there briefly,

1 and I was really not happy about having to go ask Cindy for help at that point. But I do
2 remember being like, wow, that feels a lot different than, like, our room, which was much
3 more laid-back.

4 Q Were you aware of any war rooms at the Willard where plans were being
5 discussed for what was going to take place on January 6th?

6 A The only -- I wasn't. The only sense I got of it was that late night -- and it
7 was really late, like, maybe 1, 2 o'clock in the morning, where I saw Boris Epshteyn and
8 Bannon come out, like, subsequently, like, within a close proximity to each other.

9

BY [REDACTED]

10 Q I think you said you thought that might have been January 4th or 5th?

11 A Yeah.

12 Q Did you talk to Boris about why he was upset?

13 A No. He just -- I mean, he literally stormed off. And then Steve came out,
14 saw me. We said hi. He gave me a big hug. He told me he loved me and asked if we
15 were having fun, like, we had fun on the bus tours, and then left.

16

BY [REDACTED]

17 Q Do you know whether Mr. Bannon or Boris had their own so-called war
18 room at the Willard?

19 A I saw both -- well, not both. I saw Boris several times at the Willard. I saw
20 him pretty frequently. And I also saw Peter Navarro several times. Like, we crossed
21 paths in the lobby. So I assumed that they were doing something somewhere in the
22 Willard.

23 Q And is it your understanding Mr. Navarro might have been meeting with
24 Boris at the Willard?

25 A My assumption was that there was, like, a senior group, right? Because, I

1 mean, the Willard was kind of, like, the central hub for everybody who was doing
2 anything. And so, seeing Boris and seeing Peter, I would guess that they would
3 be -- from my experience in the past, like, that they would be on the same kind of, like,
4 level, organizing level.

5 Q And did you see Mr. Bannon several times at the Willard, too, or just that
6 one time?

7 A Just that one time.

8 Q Okay.

9 A Although I believe Jen also bumped into him at one point on the elevator.

10 Q Do you recall seeing --

11 A But Jen bumped into him after the 6th -- I just remembered this -- because
12 he had told her that there was a rumor that Jen was Ashli Babbitt, like, that Jen was the
13 one that had gotten shot in the Capitol.

14 Q Do you recall seeing any members of the Trump White House at the Willard
15 in January when you were there?

16 A Not at the Willard. I bumped into Mike Pompeo in the Trump lobby at one
17 point, and we exchanged short pleasantries. But, yeah, no, I don't remember seeing
18 anybody from, like, the official White House staff at the Willard.

19 Q And so you saw Mr. Pompeo at the Trump Hotel in D.C.?

20 A Yes, correct.

21 Q Do you recall approximately the date?

22 A December 11th, I think. It was right before the December 12th rally.

23 BY [REDACTED]

24 Q January 5th or 6th, did you go to any meetings at the Trump Hotel?

25 A No.

1 Q So all of these hotel room suite interactions that we've been discussing
2 during this timeframe, those only took place at the Willard?

3 A Correct.

4 Q All right.

5 I think at this point we just want to cover a couple things about the document
6 production, recognizing that you're going to continue to produce documents to us, but
7 specifically just inquire about whether you have certain kinds of communications.

8 A Sure.

9 Q As of this morning, you had produced about 13 text message conversations.
10 Then, shortly before the deposition, I think there were maybe 36 PDFs that got uploaded.
11 We obviously haven't had a chance to review those, because those came in, I think, less
12 than an hour before we were going to meet with you this morning. And then also a
13 download of your personal [REDACTED] account.

14 So what I want to ask is whether just you have had certain kinds of
15 communications, and then you can let us know if it's within what you have produced or if
16 you still need to produce it.

17 A Sure.

18 Q So have you had written communications with the Trump White House
19 regarding the subjects covered by the subpoena?

20 A Not -- not directly, to my knowledge.

21 Q Okay.

22 A The cell phone that I was using during this period is broken and in my RV in
23 storage, and I have to go retrieve it. So I'd want to double-check that I wasn't on a
24 thread with Amy. So I don't want to completely rule it out, but, to my knowledge, there
25 is not.

1 Q Members of the Trump family?

2 A No, not with me at all.

3 Q All right.

4 Now, did you have written communications with Members of Congress?

5 A Yes.

6 Q Okay. Who were you having those written communications with?

7 A I am almost certain -- part of the problem here is sometimes I conflate Jen
8 and I as one unit.

9 Q Right. I understand. We're asking specifically you.

10 A I think I have some messages between me and Dr. Gosar. It could be in
11 Jen's; it could be in mine. I'm not 100 percent sure.

12 I definitely have communications with Congressman Good's staff about, like, some
13 of the speaking role stuff. That might be the only one on my phone, because I didn't
14 usually handle that.

15 Q Okay. And have you produced those in what has been given to us so far?

16 A I don't think so, no.

17 Q Okay.

18 A Because I need to retrieve that phone. All I've been -- so these, to be clear,
19 are just what I was able to get from my computer, like, my iMessage off my computer.
20 So it doesn't include all of the SMS texts.

21 Q And when you say "this," just for the record, you're referring to a, sort of,
22 accordion folio of documents that you've brought with you today.

23 Are the documents within that the same as the documents you've already
24 uploaded?

25 A Yes.

1 Q Okay. So there's nothing in that folio that we don't have digitally.

2 A Correct. I made sure -- that's why, this morning, it was somewhat -- I
3 was -- after I upload stuff, I can't see what I've already put in. So, this morning, after
4 consulting with Josh, he told me, when in doubt, resend it. So, this morning, before we
5 came in, I just took every file that I -- because I've been trying to go through and collect it
6 all and send it in.

7 And then, on the email stuff, we decided that, even though we didn't have an
8 opportunity to, like, separate what was relevant and irrelevant, it was better to just send
9 the whole file from Google over to you guys.

10 Q So, just so we know when reviewing the email file, are there email
11 communications with Members of Congress or their staff?

12 A I don't believe so. It might be splitting hairs, but there may be
13 communications based on the Rally Congress stuff that -- like, I facilitated something like
14 120,000 messages back and forth. People will send me the messages they get back in
15 correspondence. I haven't been able to review it. That stuff happened really quick, so
16 I'm not completely sure. But nothing that would be, like, direct, like, as far as organizing
17 or even logistically, to my knowledge.

18 Q So the Rolling Stone article from October refers to the author having
19 reviewed communications from January 6th with Congressman Gosar and
20 Congresswoman Boebert. Did you have written communications with those Members
21 on January 6th?

22 A I think he's talking about pictures. Because we do have pictures, lots and
23 lots of pictures, with Members of Congress throughout this whole process.

24 Q Were you using, in addition to your phone to send text message, alternative
25 messaging platforms like Telegram, Signal, WhatsApp?

1 A Yes. So there were Facebook messages that I haven't had an oppor- -- I
2 actually was trying to figure out how to download in order to upload. So I do have
3 Facebook communications.

4 I was using Signal. I need the old phone to be -- like, I have to figure out how to
5 pull those off the old broken phone. Like, the screen's all busted up on it. So I have
6 to -- because Signal, the new version, I can't go back unless I get that phone. So I have
7 to figure out how to get that done.

8 Q Do you have any written communications with Ali Alexander?

9 A There are some of the text messages from early on that I believe I provided.
10 There may be some in the email as well. But that would be the extent of it.

11 Q And did you delete any text messages or emails that would have been
12 responsive if you still had them in your possession?

13 A Nah. Because of the We Build the Wall stuff, I have been -- I've
14 subsequently -- like, in the media aftermath, I started getting letters from Apple, iCloud,
15 Google, Facebook, Dropbox -- there was, like, eight of them -- that they had turned over
16 access to all of my personal communications basically since January 2019.

17 So I've been working under the assumption that, if I delete something, it doesn't
18 matter anyway; the records are out there. So, no, I haven't deleted anything.

19

BY [REDACTED]

20 Q Did you only use one phone number during the period covered by the
21 subpoena?

22 A Yes.

23 Q And I apologize I did not ask this question earlier. I just wanted to follow
24 up. With respect to the Willard, when you were there in January, around 4th, 5th, or
25 6th, did you ever see any Members of Congress there?

1 A I do believe I saw Lauren Boebert there. I can check my pictures too.
2 Like, we took a lot of pictures with people in the Willard. I want to make sure I'm
3 accurate before I say one way or the other. I assume we did, but I'd want to go back
4 and look to make sure I'm being correct on that.

5 Q And why do you say you assume you saw Ms. Boebert at the Willard?

6 A Well, we saw lots of people. Like, the Willard really was, like, the main hub
7 of people. She had spoken, she had given a very passionate speech at the Supreme
8 Court, like, on December 12th. And I can't remember but I think we may have even
9 taken a picture with her. But that's why I'd want to go through my pictures to check.

10 Q But, in January 2021, do you recall seeing Ms. Boebert or any other --

11 A That's what I'm saying. Before the Ellipse rally --

12 Q Okay.

13 A -- the picture we showed Hunter of us with Congresswoman Boebert may
14 have been, like, in the Willard lobby. I'm not -- I'd have to go back. I don't remember
15 for sure.

16 Q That's fine. If you could just send those photos.

17 A And we're going to produce the pictures, too, by the way, so --

18 Q Great.

19 Okay. That's it for me.

20 ██████████ All right. Well, Mr. Stockton, we appreciate all the time today.

21 Just to make clear for the record, obviously you know from the subpoena, the
22 production of documents originally required production December 6th. We did -- I will
23 say, I'm sorry. Dealing with a family emergency, particularly with a child, around the
24 holidays, I'm sorry you had to deal with that, and I hope everything is okay.

25 You know, the discussion that we had previously was to extend that deadline.

1 Obviously, we know that you gave us some documents last Friday, December 10th, and
2 then continued to upload documents on a rolling basis. Obviously, it's our hope that we
3 can receive the full production as soon as possible from you so that we're not continuing
4 on a piecemeal rolling basis.

5 But, also, because of the ongoing, you know, production of documents, we're not
6 in a position to technically close the record of the deposition. So what we're going to do
7 is, we're going to hold open the deposition and essentially stand in recess and reserve the
8 right to bring you back to talk about information that may come out from the additional
9 production of documents. Obviously, we'll have those conversations through your
10 counsel to schedule an agreeable time for that, but --

11 The Witness. And hopefully we could maybe do that virtually without coming all
12 the way back. I don't know if that's a possibility or not, but my resources are incredibly
13 strained, so making trips out here is incredibly difficult.

14 The hardest part is going to be retrieving that phone and then figuring out how to
15 get, like, what's on the phone I was using at the time off.

16 Other than that, though, as soon as we get settled -- like, we fly back on
17 Thursday -- we will make complete production according to the subpoena a top priority.

18 [REDACTED] Well, thank you. I appreciate that. We'll obviously work through
19 the nuts and bolts as best we can on how to move forward. But I just did want to make
20 clear for the record that, although we are wrapping up right now, we're just going to hold
21 the deposition in recess.

22 The Witness. Understood.

23 [REDACTED] All right.

24 Well, I think, with that, we can go off the record.

25 [Whereupon, at 5:10 p.m., the deposition was recessed.]

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Certificate of Deponent/Interviewee

I have read the foregoing ____ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

Witness Name

Date