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

DEPOSITION OF: CAROLINE WREN

Friday, December 17, 2021

Washington, D.C.

The deposition in the above matter was held in Room 4480, O'Neill House Office Building, commencing at 10:02 a.m.

Present: Representatives Schiff, Lofgren, Murphy, Aguilar, Luria, and Cheney.

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2 Appearances:

3

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6 For the SELECT COMMITTEE TO INVESTIGATE

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

8 [REDACTED], SENIOR INVESTIGATIVE COUNSEL

9 [REDACTED], SENIOR INVESTIGATIVE COUNSEL

10 [REDACTED], DETAILEE

11 [REDACTED], CHIEF CLERK

12 [REDACTED], DEPUTY STAFF DIRECTOR

13 [REDACTED], CHIEF ADMINISTRATIVE OFFICER

14 [REDACTED], PROFESSIONAL STAFF

15 [REDACTED], INVESTIGATIVE COUNSEL

16 [REDACTED], INVESTIGATIVE COUNSEL

17 [REDACTED], RESEARCHER

18

19 For CAROLINE WREN:

20

21 MICAH KANTERS, ARNALL GOLDEN GREGORY LLP

22 JOHN P. ROWLEY, JP ROWLEY LAW PLLC

23 WILLIAM PARRISH, STRADLING, YOCCA CARLSON & RAUTH



1

2 [REDACTED]. Good morning.

3

4

5

This is a deposition of Caroline Wren conducted by the House Select Committee to Investigate the January 6th Attack on the United States Capitol pursuant to House Resolution 503.

6

7

At this time, I'd ask the witness to please state your full name and spell your last name for the record.

8

Ms. Wren. Caroline Morgan Wren, W-r-e-n.

9

[REDACTED]. Thank you.

10

11

12

This will be a staff-led deposition, and members, of course, may choose to also ask questions. You may see them come into the Webex and we'll announce when they arrive and leave.

13

14

15

16

In the room today are myself, [REDACTED], Senior Investigative Counsel; [REDACTED], Senior Investigative Counsel; [REDACTED], Investigative Counsel; [REDACTED], Deputy Staff Director and Chief Counsel. I wanted to make sure I got all of them right.

17

18

And on remote, we have my colleague who you've met, [REDACTED], [REDACTED], Investigative Counsel. And as I said, members may come in.

19

20

The other people present on the Webex are [REDACTED] Chief Clerk [REDACTED]; [REDACTED]; and I mentioned [REDACTED].

21

22

23

24

Under the House deposition rules neither committee members nor staff may discuss the substance of testimony you provide today unless the committee approves it -- excuse me -- approves the release. You and your attorney, as we discussed, will have an opportunity to review the transcript.

25

Before we begin, I'd like to describe a few ground rules. We will follow the

1 House deposition rules that we provided to your counsel previously. Under those rules,  
2 counsel for other persons or government agencies may not attend, but you are permitted  
3 to have your two attorneys present.

4 At this time, could counsel please state their names for the record?

5 Mr. Rowley. John Rowley. And here with me is Bill Parrish and Micah Kanters.

6 [REDACTED]. And I apologize, Micah. You are included in that. I did not mean to  
7 say two attorneys.

8 Mr. Kanters. No worries at all.

9 [REDACTED]. You are very important.

10 There is an official reporter transcribing the record of this deposition. Please try  
11 to wait until each question is completed before you begin your response and we'll try to  
12 wait until your response is complete before we ask our next question.

13 The stenographer can't record nonverbal responses like when you shake your  
14 head. So it's important that you actually answer each question verbally with an audible  
15 verbal response. People frequently nod and don't realize she'll have to ask you.

16 We ask that you provide complete answers based on your best recollection. If  
17 the question is not clear, please don't hesitate to ask for clarification. If you don't know  
18 the answer, please just simply say so.

19 You may only refuse to answer a question to preserve a privilege recognized by  
20 the select committee. If you refuse to answer a question based on a privilege, staff may  
21 either proceed with the deposition or seek a ruling from the chairman on the objection.  
22 If the chairman overrules such an objection, you are required to answer the question.

23 I also want to remind you -- you know, we've done this before, and we do it for  
24 everyone -- that it is unlawful to deliberately provide false information to Congress.

25 Since this deposition is under oath, providing false information could result in

1 criminal penalties for perjury and/or providing false statements.

2 Do you understand all of that or do you have any questions?

3 Ms. Wren. Yes, I understand.

4 [REDACTED]. Okay. Would you please stand and raise your right hand to be  
5 sworn?

6 The Reporter. Do you solemnly declare and affirm under the penalty of perjury  
7 that the testimony you are about to give will be the truth, the whole truth, and nothing  
8 but the truth?

9 Ms. Wren. Yes, I do.

10 [REDACTED]. Logistically, just let us know if you need any breaks, comfort breaks,  
11 discussion breaks, or if you'd like to discuss anything. You know, it's not meant to be a  
12 marathon, so please don't hesitate to interrupt us if you need a break.

13 There may be several people asking questions. I know I mentioned the members  
14 may jump in. My colleagues may have questions. We'll try to keep the flow and not  
15 overlap on each other. But if you don't understand a question, please, again, just simply  
16 ask me and my colleagues to repeat it.

17 EXAMINATION

18 BY [REDACTED]:

19 Q Okay. Can we just start with some biographical information?

20 Can you provide your full name, your maiden name, any other names that you've  
21 used?

22 A Caroline Morgan Wren.

23 Q And when were you born?

24 A [REDACTED].

25 Q Can you give us your current address, your cell phone, and your email

1 address?

2 A [REDACTED], Washington, D.C., 20002. My cell  
3 phone --

4 Q Go ahead.

5 A My cell phone is [REDACTED]

6 And what was the third one?

7 Q The email address.

8 A I have two. There's [REDACTED] and  
9 Caroline@bluebonnetfundraising.net.

10 Q And are those all the same for the period October 2020 through  
11 January 2021?

12 A Those are.

13 Q Okay. Do you have --

14 A No. I had a Trump email that I think was closed sometime around  
15 mid-December -- or mid-November, I'm sorry, if we're talking about October.

16 Q Did you have an Instagram account during that time?

17 A I did.

18 Q Okay. And what was that handle?

19 A @CarolineWren.

20 Q Okay. And is that the same, is that active?

21 A Yes.

22 Q And did you have a Twitter account during that time?

23 A Yes. I think it's the same, @CarolineWren.

24 Q And is that active?

25 A Yes.

- 1 Q Is it private or is it viewable?
- 2 A Private.
- 3 Q Okay. Did that change at some point?
- 4 A Yes.
- 5 Q When did that, I think they say, go dark?
- 6 A When the AP story came out with my -- saying my name was on the permit
- 7 or maybe like right before.
- 8 Q Would that have been sometime in January 2021?
- 9 A Yes, like sometime between January, probably, 10th and 20th or something.
- 10 Q Are you married?
- 11 A No.
- 12 Q Okay. And what is your -- just tell me your educational background?
- 13 A I went to Auburn University.
- 14 Q Auburn?
- 15 A Auburn.
- 16 Q I lived in Alabama, so I almost said War Eagle, but I held it in.
- 17 Can you tell me your family members' names, your parents' name?
- 18 A Carol Wren.
- 19 Q Your dad's name?
- 20 A William Casey Wren.
- 21 Q And do you have any siblings?
- 22 A Rebecca Wren and Katherine Wren.
- 23 Q Those are two sisters?
- 24 A Yes.
- 25 Q Can you tell me what your current occupation is?

1 A I'm the president of Bluebonnet Fundraising.

2 Q And do you have any other sources of income right now?

3 A No.

4 Q Okay. And I just want to go back a little bit. And I know some of these  
5 may overlap, so if they do just kind of help us understand.

6 How long have you been with Bluebonnet Fundraising?

7 A I founded it in 2015, January of 2015.

8 Q And are you still the founder and president?

9 A Yes.

10 Q And have you been the entire time?

11 A Yes, with the exception of in March of 2020 to November of 2020, I went  
12 in-house with the Trump campaign. So I didn't have outside clients outside of the  
13 Trump campaign for that duration of time.

14 Q And would that have been Trump Victory Finance Committee?

15 A It's a good question. I don't actually know. Trump Victory was the joint  
16 fundraising committee between Donald J. Trump for President and the Republican  
17 National Committee. I believe that my salary was just Donald J. Trump for President.

18 Q Okay. So, to your knowledge, were you employed by Trump Victory  
19 Finance Committee?

20 A Trump Victory Finance Committee was not -- was the name of the finance  
21 committee. So like the person who employed me, I believe, was Donald J. Trump for  
22 President, Inc.

23 Q Got it.

24 A From March to November.

25 Q And then are you also an adviser for Women For America First?

1 A No.

2 Q And did you found a PAC in 2015 called Security is Strength PAC?

3 A I was not a founder, but I worked on it.

4 Q And I just want to note for the record that Representative Aguilar has joined  
5 us via Webex.

6 Is there anything else that you've worked on that I missed in terms of Bluebonnet,  
7 Donald J. Trump for President, you worked on Security is Strength PAC? Does that take  
8 me back about 2015 or are there any --

9 A No. There's a lot more that I've worked on from 2015 to present.

10 Q Could you cover that for us?

11 A I can cover to the, like, best of my recollection. But my -- I -- it is a  
12 fundraising firm, and so I contract a lot of different candidates and organizations.

13 So in 2015, I -- Security is Strength PAC was the super-PAC supporting Senator  
14 Lindsey Graham, who was running for President at the time, and I just -- I had been his  
15 finance director and then worked on the super-PAC.

16 Also during that time, I think I worked on the Republican Jewish Coalition, the  
17 College Republican National Committee, and probably some other candidates that I can't  
18 recall.

19 When Senator Graham dropped out of the Presidential race, I was the finance  
20 director for the Cleveland 2016 Host Committee, which was the 501(c)(3) that puts on the  
21 convention, the Republican National Convention.

22 And then after President Trump won, I became the national finance consultant in  
23 the beginning of 2017. And that contract, I believe, at that time started out as the RNC.  
24 And then, when the President announced for reelection, or shortly after, became an  
25 employee of Trump Victory, which, again, is that JFC.

1           And from 2017 to 2020, I had a number of different clients outside of just being  
2 like national finance consultant for the President. It included the Republican National  
3 Committee, the National Republican Congressional Committee, Republican Governors  
4 Association, the National Republican Senatorial Committee, Governor Henry McMaster,  
5 Attorney General Alan Wilson, Congressman Tom Rice.

6           Q    I'll cut you off.

7           A    Oh, okay. This is going to take a while. Okay.

8           Q    You're fine. We appreciate it. Suffice to say, very extensive fundraising  
9 history.

10           I think you said that you started for the Trump campaign in March 2020?

11           A    Yeah. Before that, I had been the national finance consultant, which  
12 means I was paid on a commission base to solicit donations for Trump Victory. And in  
13 March of 2020, I went in-house with the Trump campaign, which means I was a salaried  
14 employee and I didn't have outside clients, and so it wasn't a commission based, it was a  
15 salary based.

16           Q    And was that when you were finance director?

17           A    I wasn't finance director. I never really had a set title. It was a -- I think  
18 on some of my email chains it was senior adviser to Kimberly Guilfoyle and national  
19 finance adviser. So it's kind of a --

20           Q    Who did you report to in the role that you were in?

21           A    Kimberly.

22           Q    Okay. And how would you describe your role in terms of what you did for  
23 her?

24           A    She was the finance chair. And so I helped kind of from a high level on,  
25 like, strategy, donor maintenance, you know, travel to put on events. I didn't really



1 under my purview like manage staff necessarily, but worked closely with a lot of the  
2 finance staff, too, so --

3 Q So you didn't supervise anyone?

4 A No.

5 Q And I think you said this earlier, that the compensation structure was now a  
6 full-time employee paid by the campaign?

7 A That's right. Yes.

8 Q And no bonuses for fundraising donations?

9 A No.

10 Q Okay. Do you remember how much you made?

11 A My -- I think my negotiated salary was like \$250,000 a year. But I don't  
12 remember the exact start date, but it was like March to November. So I wouldn't have  
13 been paid \$250,000 because I didn't work for a full year.

14 Q Okay. And can you tell me where you were in terms of the election  
15 results? Just like were you watching? Who were you watching with? To be clear,  
16 this is the 2020.

17 A Election night 2020?

18 Q Yes.

19 A I was at the Trump Hotel.

20 Q Okay. And how many people were there with you?

21 A A lot. We had a big election night watch party.

22 Q Was that in like a room or a public area?

23 A Several rooms. There were -- we utilized every single room in the hotel  
24 because there was COVID restrictions then, so it had to be limited amount of people in  
25 each room.

1 Q The whole hotel was booked up?

2 A We had the whole hotel.

3 Q Oh, wow.

4 And how would you describe the expectation before election night in terms of like  
5 just your -- or just maybe like your vibe or the group vibe in terms of what you were  
6 expecting to happen?

7 Mr. Rowley. Whose expectation?

8 BY [REDACTED]:

9 Q Let's start with your personal expectation.

10 A My personal expectation. I think my personal hope was that President  
11 Trump would win. Expectation-wise, I think I was 50/50. I wasn't really sure what to  
12 expect.

13 Q And at the time -- let me back up for a second.

14 The vibe of all the people there, did it seem consistent or did it seem kind of like,  
15 you know, everybody kind of -- you didn't -- it was like mixed?

16 A I think the vibe was nervous and a bit of a roller coaster, you know.  
17 Excitement and then go down. I've been to a lot of election night parties where you win  
18 a State, others you know are going down. So it was not clear by the end of the night  
19 when we went to bed. So I think I went to bed rather nervous, but like nervous excited.

20 Q So when you went to -- excuse me. Let me note for the record that  
21 Representative Luria has joined us on the Webex.

22 So you said when you went to bed you didn't know what the results were, you  
23 didn't know if it had been won or lost?

24 A That's correct.

25 Q Okay. And in terms of discussions at the time, were there discussions

1 about election issues or fraud issues being a concern like the night of the election?

2 Mr. Rowley. You're asking her about whether she was involved in such  
3 discussions?

4 [REDACTED]. Yeah. Like whether she remembers that being a topic of discussion.

5 Mr. Parrish. That she participated in?

6 [REDACTED]. Yeah. That she participated in or that she heard. Like just a  
7 personal experience.

8 Ms. Wren. I don't recall that, that evening, if we were thinking there was  
9 election fraud instantly. In my -- I was not in any sort of the word everyone likes to use  
10 right now, war room or anything. I was entertaining donors. So like we weren't privy  
11 to any special information regarding things like that. So any information I would've  
12 gotten would have been from television, like watching it live from CNN or FOX.

13 And so if they were talking about any sort of voter fraud, I'm sure that would have  
14 been a topic that I then talked to the people around me on, but --

15 BY [REDACTED]:

16 Q No, that makes sense.

17 And let me just note for the record that Representative Cheney has also entered  
18 the Webex.

19 So in terms of -- how would you describe the, for lack of a better word, vibe of  
20 after the election, like immediately after, like the next day?

21 A I think people were a little bit nervous and confused about what next steps  
22 were and where this was going to go.

23 Q And what was your personal view? And let me be clear, when I ask, this is  
24 just kind of like for historical, just the knowledge of it with zero judgment. There's no,  
25 like, right answer.

1 But what was your personal view on the election results?

2 A At that time -- you know, it's been a year, but I think I woke up thinking there  
3 was -- that there was still a lot of hope.

4 I think that the Arizona call was confusing at that time because it kind of meant,  
5 okay, well, you have less -- like what State do we pick up at that time. But I'm in  
6 fundraising and not necessarily political, so, like, I don't -- you know, counting electoral,  
7 like the different votes and how many points each State gets, that's not really what I do.  
8 And so I think I woke up still optimistic, but not really sure what was going to happen.

9 Q And I think there were a few days where there were some odd things and  
10 things were being called. But by the Friday, by the end of that week, did you have some  
11 sense of whether the election had been won or lost?

12 A By the end of that week, [REDACTED].

13 Q That sounds like a terrible end to the week.

14 [REDACTED], did you have a sense of what had happened  
15 during your downtime?

16 A I think there was a great sense of confusion and kind of, I would also argue,  
17 like fear and anger, too, about the results, and a lack of clarity.

18 Q You mentioned a second ago that your focus -- oh.

19 You mentioned a minute ago that your focus was really on fundraising. And I'm  
20 curious. Were you getting calls from folks asking afterwards if there was a legal fund  
21 that needed money?

22 A Yes.

23 Q Who were the people that called you about that?

24 A I think a lot of the donors were wanting to help in any way. So whether or  
25 not it was money or boots on the ground, whatever was needed.

1 Q And what was their understanding in terms of, when they were donating  
2 that money, what did they think the money was going to?

3 Mr. Parrish. Objection, calls for speculation.

4 BY [REDACTED]:

5 Q Oh, let me rephrase.

6 What did you tell them, when you were fundraising the money, what the money  
7 was going to?

8 A I may get these numbers wrong, so I'm going to be clear, because they  
9 changed throughout the years. But when I would solicit funds, it would be for  
10 something called Trump Victory. And so I think by the end, like right at the end of the  
11 campaign, I think a couple could give \$817,600.

12 And so if it was someone that I was soliciting for something that large of a  
13 donation, I would tell them that the first \$5,800 -- or 11,600, because we're talking about  
14 a couple -- would go to the Donald J. Trump for President campaign. The next \$70,000  
15 would go to the Republican National Committee general fund. And then buckets would  
16 spill over from there.

17 There were three different buckets. There was a legal fund. There was a State  
18 party fund, and so that's where that number increased by time as they added different  
19 State parties into it. And then the other fund was -- there was one other. And that  
20 total ended up being 817,600.

21 So if people were giving in a large amount, really over 250,000 or 500,000, like  
22 that legal fund was always a talking point that came from within. Now the waterfall  
23 would move as to where the legal fund would be at times.

24 And I never really -- it was a little bit confusing as to where that would be, but it  
25 was certainly a big talking point that I would give to donors from 2017 all the way till

1 November 2020, would be, you know, we're going to be prepared and we have a legal  
2 fund.

3 Q Oh, so you literally led into my next question, because I was trying to figure  
4 out what was the timing of the representations that you were just talking about. That  
5 was all through during the time '17 to '20 when you were working on the campaign?

6 A Yes.

7 Q There was always fundraising for the legal fund?

8 A Yes.

9 Q Okay. And you mentioned a minute ago -- maybe I misheard, but I couldn't  
10 believe how fast you rattled off those numbers -- but who gives that to you, the  
11 percentages of where they go?

12 A It's in the disclaimer on the contribution forms. But usually, I think, things  
13 like that were mainly done by the RNC. Because, again, like if you're talking about that  
14 amount of money, 11,600 goes to the Trump campaign. Everything else are funds  
15 controlled by the RNC.

16 Q Okay. And so at the time that you were there were there directions from  
17 senior members -- well, let me back up for a second.

18 When did you stop fundraising for the Trump campaign?

19 A The morning of the election.

20 Q Okay. So you were done the morning of the election?

21 A Done.

22 Q And prior to the election, what were the directions either from senior  
23 members of the campaign or the RNC in terms of fundraising specifically for, like, the  
24 legal efforts, or were there any?

25 Mr. Parrish. Objection, form.

1 BY [REDACTED]:

2 Q You can still answer the question.

3 A That wasn't really how it worked. It was a talking point within the matrix of  
4 what you give. And I guess someone could designate a check, that I want this to go to  
5 the legal fund part. I don't ever remember someone doing that or me asking someone  
6 to do that. It was always just Trump Victory. If they wanted to give \$250,000, they  
7 wrote that to Trump Victory, and then whatever the set waterfall was at that time or the  
8 accounts it fell into.

9 So I was not involved in, like, moving, saying, oh, we need to push up the State  
10 accounts [inaudible] or anything.

11 Q A minute ago you said there was a matrix. Can you explain that?

12 A Matrix is the same as I use as the term waterfall. So that was what I  
13 described earlier about the beginning of the money going to the Trump campaign and  
14 everything else spilling over to those different funds.

15 Q Who gives you the talking points to use in terms of, "This is what we're  
16 communicating in terms of fundraising"?

17 Mr. Parrish. At what time?

18 BY [REDACTED]:

19 Q Oh, sorry. While you were working on the campaign. I mean, if it's  
20 changed, you can explain, but --

21 A Right. I don't recall anyone giving me talking points. Like, I know how to  
22 talk about this. This was the third Presidential campaign or fourth Presidential  
23 campaign I've worked on, so --

24 Q Is it fair to say you kind of have autonomy and you pick the things that you  
25 think will resonate with donors and what's consistent and raises money?

1           A    No, I don't think so, because it was -- I mean, if they were contributing to  
2           that, they were contributing because of Trump.   So there wasn't really a need to go past  
3           those different accounts.   And I also -- as I mentioned, like, very -- I don't recall ever  
4           doing this, saying, "Oh, you should just designate this only to the legal fund," or  
5           something.

6           I kind of trusted the system of they -- my job was to raise the money, not to spend  
7           it.   So I would, you know, try to push people to give as much as they were willing and  
8           able to give.   And then what buckets that spilled over to afterwards were already set.

9           Q    Let me ask a clarifying question, and this is just my -- you are fully aware of  
10          my lack of political knowledge.   So I appreciate every time you explain [inaudible].

11          Is it fair to say that your focus was largely on large dollar donors?

12          A    From 2017 to 2020, yes, that was my focus.   And then when I went in with  
13          the Trump campaign, it was -- it was still a focus, but also I helped kind of manage -- and it  
14          had already been started -- but take over the bundling program, which was the Trump  
15          Victory Finance Committee.

16          So that was actually not just focused on large donors.   The idea was to get  
17          anyone who wanted to be involved in the campaign and wanted to solicit funds from  
18          others to become a bundler.

19          That could be -- I dealt with wonderful women who would host a house party at  
20          their house and would call people and their friends and ask them to give \$25.   And so I  
21          would assign them a bundler number and help track that so that they could see their  
22          progress.

23          Q    And when do you remember -- let me go back for a second.   Maybe I  
24          misheard you.   Did you say you did work with Trump Digital?

25          A    I didn't mention Trump Digital.



1 Q Okay. I literally just -- my apologies. There was a cough --  
2 Mr. Rowley. Sorry.

3 [REDACTED]. I know that's not your fault, please feel free to cough. It's terrible  
4 hearing to start with.

5 BY [REDACTED]:

6 Q When do you remember first communicating with other people about  
7 organizing events in support of President Trump after the election results?

8 A Could you be more specific, please?

9 Q Well, if I understood you, you were saying that your fundraising job ended  
10 on the day of the election.

11 A Right.

12 Q And then after that, when do you remember having conversations about  
13 doing any events in support of President Trump after that?

14 Mr. Rowley. Prior to January 6th?

15 BY [REDACTED]:

16 Q Yes.

17 A The only events that I recall with President Trump during that time was a  
18 rally in Georgia on the 4th and then the event at the White House Ellipse on the 6th.

19 Q Okay.

20 A And then Christmas parties and Hanukkah.

21 Q I appreciate that. Everybody forgets the Hanukkah parties.

22 So in terms of your kind of fundraising expertise, what kind of success did you see  
23 in terms of the fundraising around the messaging that the election had been stolen after  
24 November 2020?

25 Mr. Parrish. Objection, vague.

1 [REDACTED]. You can still answer.

2 Mr. Rowley. And, [REDACTED], the question goes to prior to January 6th,  
3 correct?

4 [REDACTED]. Oh, we can do before January 6th and after January 6th, but let's start  
5 with before January 6th.

6 Mr. Rowley. Well, I'm going to object to anything after January 6th. That's why  
7 I'm trying to make that point. So if we can keep the record clear.

8 [REDACTED]. Well, let's start with before January 6th and then we'll explain why  
9 after is relevant.

10 BY [REDACTED]:

11 Q But for right now, just before January 6th, what kind of -- as a fundraiser,  
12 what was your experience in terms of how -- I guess for lack of a better word -- like  
13 successful that was in terms of a message for fundraising?

14 A For me, I don't recall ever soliciting funds during that time. Like I wasn't  
15 raising money from donors to go into any sort of like account or the RNC -- like the Trump  
16 campaign -- I'm not really sure how that would've worked, if the campaign could still  
17 solicit funds after the election.

18 I know that there were -- you could still technically, like, I guess, give to the RNC,  
19 but it may have still been Trump Victory, too, as a term, but I wasn't involved in doing  
20 that.

21 Q And I think you mentioned you were raising money for the January 4th event  
22 in Georgia. Was that for the Save the US Senate PAC?

23 A No. I didn't -- you asked me what events I knew of that the President went  
24 to and I said the event on the 4th. So Save the US Senate PAC was a super-PAC  
25 supporting those two candidates, but that super-PAC had nothing to do with the rally on

1 the 4th.

2 Q Okay. So let me back up for a second, and I apologize if this wasn't clear.

3 What I was asking was, did you communicate with anyone after the election to  
4 organize events in support of President Trump? And I thought you were saying you  
5 helped organize the rally in Georgia.

6 A Oh.

7 Q You're just saying you were aware of it?

8 A Aware of it, yes. I wasn't there to help organize.

9 Q Okay. So prior to January 6th, between the election and January 6th, did  
10 you help organize any events in support of President Trump?

11 A Christmas parties.

12 Q And the Hanukkah party?

13 A Yes, exactly.

14 Q Okay. And so let me go back for a minute. In terms of the Save the US  
15 Senate super-PAC, did you raise money for that entity?

16 A I did.

17 Q Okay. And was any of that fundraising related to the -- did that fundraising  
18 involve kind of the messaging that the election had been stolen or that election integrity  
19 was part of that messaging?

20 A No. The purpose of Save the US Senate PAC was to have Don, Jr. be  
21 featured in the ads to speak directly to Georgia voters to say it is important that you vote.  
22 Because at that time there was concerns over voter suppression of Trump voters who  
23 were upset about the Georgia election results and that they would not turn out.

24 Q Okay. And did you do fundraising after January 6th?

25 A I'm a professional fundraiser. That's what I do.

1 Q Okay. No, I'm just saying, some people left the business, so we just kind of  
2 have to check and see what they're still doing.

3 And the reason, let me just give you, to answer Mr. Rowley's question a minute  
4 ago, the reason that we ask some questions before January 6th and after January 6th is  
5 because the committee isn't just looking at what happened in a day, right?

6 Part of our purview is things that happened before, things that happened after,  
7 things that impacted things, did things change in terms of how would we prevent the next  
8 January 6th, and what factors were relevant.

9 So when I ask you about what did you see in terms of the success of fundraising --

10 A Right.

11 Q -- in terms of the message of the election being stolen before January 6th --

12 A Yes.

13 Q -- versus after January 6th --

14 A Right.

15 Q -- the comparative nature of that makes that relevant.

16 So immediately after January 6th, and I would say, like, let's say, like a month  
17 afterwards, did you see any change between right before January 6th and afterwards in  
18 terms of any impact that the stolen election message had on the fundraising?

19 Mr. Rowley. [REDACTED], the committee's authorizing resolution speaks in terms of  
20 events that happened on January 6th and the causes of January 6th. So I don't see the  
21 relevance of anything that may have happened after January 6th in terms of fundraising.

22 Ms. Wren is a professional fundraiser. She continued to work after January 6th.  
23 So I think questions after January 6th about her fundraising activities really exceed the  
24 scope of the authorizing resolution for the select committee.

25 [REDACTED]. I understand what you're saying. I will say that there has been

1 evidence in reporting that the nature of some of the fundraising was also tied to some of  
2 the folks who were present at the Capitol. The fundraising metrics actually correlate  
3 with that. So there is a tie in terms of fundraising before and fundraising after.

4 And I don't think the House resolution is so narrow that activity after January 6th  
5 wouldn't be relevant, especially when it comes to something as core as fundraising.

6 I'm not asking her the whole year since then, I'm just saying, immediately after  
7 January 6th, did she notice any difference. I don't think that would be so outside of the  
8 purview.

9 Mr. Rowley. As long as we're not going into a lot of detail about her activities  
10 after January 6th --

11 [REDACTED]. No. No.

12 Mr. Rowley. -- then I'll withdrawal the objection. But if we -- you know, if you  
13 persist and you want to get into specific things after that, I will object.

14 [REDACTED]. No. I appreciate that. And like I said, we're just trying to get a  
15 sense of in terms of, before and after, did you notice any change.

16 Mr. Parrish. Just objection on vague and ambiguous.

17 The Witness. I could speak specifically to after the election and that period  
18 leading up to January 6th. There was frustration by myself and others. The donors  
19 wanted to help and they wanted to contribute to things to help. I did not have an outlet  
20 for them to contribute to.

21 Like, if they loved the work that Rudy Giuliani was doing, there was no way to  
22 contribute to Rudy Giuliani's efforts that I was ever aware of, like, because the campaign  
23 was closed by then so I wasn't fundraising for Trump Victory at that time.

24 I was frustrated during that time because I would get -- and I want to be clear that  
25 I'm not going to give any names when I say this -- but I got calls from several donors

1 saying, "I just saw Sidney Powell on FOX News and I gave \$250,000 on her website."

2 And I didn't understand who she was, what was going -- and so I was worried  
3 about money being wasted and going places, and these people were wanting to give in  
4 good faith. And I did not understand where -- like what these entities were and where  
5 that money would go.

6 BY [REDACTED]:

7 Q And to be clear, when you say "these entities," are you talking about, like,  
8 the individual lawyers?

9 A Right.

10 Q Like, I think you mentioned Giuliani? I think you mentioned Ms. Powell?

11 A Yes.

12 Q Okay. But were you aware of, for lack of a better word, organizations that  
13 were involved in the legal effort, like RAGA, the Republican Attorney Generals  
14 Association?

15 A I was not aware -- like, they weren't fundraising off of election integrity  
16 things at that time, to my knowledge.

17 Q You do not believe they were?

18 A Yeah. No, I don't -- I don't recall like any -- I don't -- I don't -- they could  
19 have been doing digital fundraising or things like that. But that was not an organization  
20 to where I got, like, calls from donors saying, you know, "I want to be giving to them," or,  
21 like, I wasn't really privy to that.

22 Q So in terms of your involvement in -- I'm going to -- I'll say -- I don't want to  
23 say Stop the Steal because there's the Stop the Steal Coalition and that gets very  
24 confusing. So let's just call it election fraud, like the election fraud fundraising.

25 In terms of your involvement in that between the election and January 6th, can

1 you explain what role you had there specifically?

2 Mr. Parrish. Objection, form.

3 The Witness. My role was that I had spent 4 years of my life meeting with  
4 donors and asking them to give to Trump Victory and President Trump, and they had.  
5 And I said, you know, we're going to be prepared. There's going to be a legal fund and  
6 you're going to be funding it and we will have lawyers on the ground. And so from that  
7 time, I did what I would call mainly donor maintenance.

8 These donors had invested a significant amount of money and they wanted to  
9 understand, like, where their investment was going and what was going on. So I spoke  
10 very frequently with a lot of our major contributors at that time, would visit with them  
11 and try and keep them updated.

12 But I wasn't, I would say, during that time ever really like actively soliciting funds  
13 for anything. I was just more talking with them about their thoughts and trying to relay  
14 information, just things that were ongoing at that time?

15 BY [REDACTED]:

16 Q And a minute ago you mentioned a couple of the attorneys. But if a donor  
17 reached out and said, "Hey, I'm really interested in, you know, Ms. Powell and I want to  
18 donate," would you help facilitate that connection for them to donate to them directly?

19 A That is something that I would do as a professional fundraiser. But specific  
20 to Ms. Powell, no. I didn't know her and I didn't -- I know she had a website. I don't  
21 know if I knew what that website was, and I -- if someone had called me and really  
22 wanted to give to Ms. Powell, and I don't recall doing this, but I would have probably  
23 looked up to try and find her website and, like, sent it to them.

24 But I think at that time I was more getting information after the fact, that people  
25 had seen her on TV and then told me that they had donated on her website.

1 Q Did you ever connect any of your donors with any of the attorneys that were  
2 working on the election fraud cases between the election and January 6th?

3 A I don't recall specifics, but that wouldn't necessarily surprise me.

4 Q Do you remember an attorney named Lin Wood?

5 A Yes.

6 Q Did you connect any of your donors with him to donate any money?

7 A No.

8 Q And I think you mentioned this earlier. You had some conversations  
9 regarding the Save the Senate PAC after discussions on New Year's. And I specifically,  
10 actually, want to turn to exhibit 54. And you have access to this, but it's in the redacted  
11 portion.

12 You're having a conversation with Charlie Kirk on December 15th, who I believe is  
13 with Turning Point Action. There's a conversation where you tell him, "Don't tell her  
14 about Georgia. She fully," quote, "boycott if they don't certify for Trump." And Charlie  
15 Kirk says, "Yeah. Okay. Then just say our continued good work then."

16 I think you're talking about Ms. Fancelli there, yes?

17 A Yes.

18 Q What was your concern there? Like, what did that mean?

19 A It's similar to what I mentioned earlier about there was a large amount of  
20 people who felt like the election in Georgia was fraudulent, and so they were frustrated  
21 and there was almost this sense of boycott, of they weren't going to, like, vote, or they  
22 didn't think the election systems were real.

23 And so my concern at that time was, we need to make sure that we are speaking  
24 to Trump supporters and that they understand that the election will be safeguarded and  
25 that they should turn out and vote for Senators Loeffler and Perdue on January 5th.



1 Q Was your concern, though, about her voting or about her donation?

2 A That comment was made specifically to -- actually, I don't see it here. Is  
3 there --

4 Q I think you have to access the -- it's the one on the bottom of 000754.

5 A Oh, it's redacted?

6 Mr. Kanters. I got it right here.

7                     . And while you're reviewing, I just need to note for the record that  
8 Representative Schiff has entered on the Webex. But take your time.

9 The Witness. Oh, okay. So this was in mid-December, and I had had a  
10 conversation with Julie about, like, funding priorities. And she had talked frequently  
11 about how she was worried about the youth, and that I told her that Charlie Kirk is doing  
12 a wonderful job in that space and that I wanted her to get to meet him and that he was  
13 having an event in Palm Beach sometime like between December 20th and 25th maybe.

14 So I invited her to go, and I wanted to set up a one-on-one meeting with her and  
15 Charlie so that Charlie could ask her for a contribution.

16 And so this was in mid-December, me having this conversation with him. And  
17 then he said Turning Point Action, which is their 501(c)(4) -- they also have a 501(c)(3),  
18 Turning Point USA -- and he was saying to me, here's our instructions. And this -- we are  
19 going to be doing, like, work in Georgia, because that was a big pitch to donors during  
20 that moment in time.

21 And this was me telling her Georgia's not a good pitch for her. Like, Julie was of  
22 the opinion that, to my recollection, as many others were of, they were worried about  
23 President Trump at that time. They weren't concerned about a majority in the Senate.

24 So it wasn't -- that would not -- Charlie does a lot of very good work, and that  
25 specific line would not be a good talking point in a meeting with Julie.

1 BY [REDACTED]:

2 Q So that makes sense. So, like, your thing was her priority -- she's a Trump  
3 donor, like her priority is President Trump. Like, trying to get Georgia is not a point she's  
4 going to care about.

5 A Yeah. She has grandchildren, and the reason I wanted to introduce him is  
6 because she was worried about the youth and people on campus. So if you're going to  
7 ask her for funding, that would be where her interest would be.

8 Q That makes sense.

9 In terms of early December, did you have any involvement in the brief that Texas  
10 Attorney General Paxton filed in terms of trying to get other AGs -- excuse me, attorney  
11 generals -- to sign on to the filing?

12 A I knew that Ken Paxton was filing an amicus brief and then wanted other AGs  
13 to get involved. And so I do think I spoke to a couple of the AGs about that.

14 Q Do you remember which States?

15 A West Virginia, Utah.

16 Q And was that fundraising conversations or was it more actually like  
17 encouraging the AGs to sign on to the brief?

18 A It wasn't fundraising. There was nothing fundraising related to it.

19 Q It was just signing on to support it?

20 A I think it was just calling them about it and asking, you know, "Are you and  
21 what's the status of this?"

22 Q And did you work with the -- can I call it RAGA for short, the Republican  
23 Attorney Generals Association?

24 A Yes. Yeah. Right.

25 Q Okay. As long as everybody knows that I'm using the acronym.

1           But did you work with RAGA at all on that or was that something that you did kind  
2 of on your own initiative?

3           Mr. Rowley. I don't understand the question.

4           ██████████. When you were reaching out to the attorney generals about the brief,  
5 was that on your own initiative or was that something that you did through RAGA?

6           The Witness. I would say that's my own initiative. Like, it wasn't --

7           Ms. Cheney. ██████████, can I ask a question?

8           ██████████. Yes, ma'am.

9           Ms. Cheney. Ms. Wren, who asked you to make those phone calls?

10          The Witness. I don't recall anyone asking me. I think it's something that I,  
11 thinking back on that time, would have offered to do.

12          ██████████. Who would you have -- I'm sorry. Go ahead.

13          Ms. Cheney. Nope. That's all right.

14          So your testimony is that you just determined on your own to call attorneys  
15 general around the country about an amicus brief in front of the Supreme Court?

16          The Witness. Yes.

17          Ms. Cheney. Thank you.

18                   BY ██████████:

19           Q     And just going back a moment, you said you would've offered to do that.

20           Would you have offered to do that for somebody?

21           A     Well, at that time Ken Paxton was the like author of it. So to my testimony,  
22 I don't recall Paxton directing me, or asking me to, or RAGA.

23           My point is, it was a year ago, I don't remember the call, but it is in my nature to  
24 have offered, said, "What can I be doing to help right now?" Think that was a lot of  
25 peoples' attitude.

1 Q And when you say, "What can I be doing to help?" are you having  
2 conversations with Attorney General Paxton or his staff? Are you offering to help them?

3 A Oh, yeah.

4 Q Okay. And so do you remember who you conversed with, either Attorney  
5 General Paxton or anyone on his staff, about those efforts to help?

6 A Paxton and Aaron Reitz.

7 Q Can you spell the last name by any chance?

8 A R-e-i-t-z.

9 Q And is that E-r-i-n?

10 A Oh, no. A-a-r-o-n, I think.

11 Q So is it a gentleman?

12 A Yes.

13 Q Okay. I have to check. And do you remember what his title was?

14 A I do not.

15 Q Okay. How did you come to know Mr. Reitz in terms of his involvement  
16 with Paxton?

17 A I would imagine that Paxton would've connected me with him.

18 Q So did you reach out to Paxton and Paxton connected you with Reitz?

19 A That's probably how it would've gone, but I talk to a lot of the AGs all the  
20 time. So I don't, like, recall exactly the process there.

21 Q Okay. And I just need to note for the record that Representative Aguilar  
22 left the Webex.

23 Would you have -- let me go back for a second.

24 The calls that you made to the AGs about signing on to the brief and your  
25 awareness of the brief, did that come from talking to Attorney General Paxton first?

1 A I don't recall.

2 Q Okay. And I just -- I'm not trying to trick you, and maybe let me be more  
3 clear. I was trying to figure out, did you hear about the brief, call AG Paxton, and say,  
4 "How do I help?" Or did AG Paxton call you and say, "You're really good at this. Hey,  
5 we're doing this. Could you help?"

6 A I do not remember at that time.

7 [REDACTED]. Okay. Does investigative counsel have a question?

8 BY [REDACTED]:

9 Q So do you remember the -- Ms. Wren, the timing of the brief was that  
10 General Paxton filed it late December 7th. Do you remember knowing before he filed it  
11 that it was coming? The lawsuit that is.

12 A I wouldn't understand that because I don't really know if an amicus brief is a  
13 lawsuit or this is --

14 Q Whatever the nature, the filing that General Paxton did, were you aware  
15 before he filed it or only after, to the best of your memory?

16 A I don't know how to answer. I don't understand it because I thought it was  
17 like an amicus brief that multiple people sign on to. I didn't know if it was  
18 something that was filed. So I don't know the process.

19 Q Sure. What was your understanding from Attorney General Paxton about  
20 why you needed to speak to the other attorneys general to sign on? What was the  
21 importance of that?

22 Mr. Parrish. Objection, form.

23 The Witness. You know, it was a year ago. What I recall is that this was  
24 something that was important. And so if I would've called, it would've probably been to  
25 ask, like, "Are you signing on to this?"

1 Q What was the reaction of the attorney general in Utah when you called?

2 [REDACTED]. Oh, sorry. I need to note for the record that Representative Aguilar  
3 just rejoined. My apologies.

4 The Witness. I do not recall. I'm not even sure if he did sign on or didn't.

5 [REDACTED] What was the other attorney general?

6 [REDACTED]. West Virginia.

7 The Witness. West Virginia.

8 BY [REDACTED]:

9 Q What was the reaction of that attorney general?

10 A [REDACTED]. I have to go." I do remember  
11 that.

12 Q And what was your messaging to them when you talked to each of them  
13 about whether and why to join on?

14 A I don't recall what my messaging would have been.

15 Q Was it linked in any way to fundraising or just the merits of --

16 A No. It had nothing to do with fundraising.

17 [REDACTED] That's it.

18 [REDACTED]. I might've missed this. You're in fundraising. So why are you  
19 calling these attorneys general about the amicus brief?

20 The Witness. I am a professional fundraiser, but also, you know, I do other  
21 things as well. And so often when people -- I can't speak, like that wasn't within my role  
22 or hat as a fundraiser when I was doing that. There was no fundraising tied to that.

23 BY [REDACTED]:

24 Q I guess I'm a little confused in the sense of, having read a lot of the texts and  
25 emails, you were -- there's a political savviness. Like, I remember there was a text

1 where I think -- and you'll remember this -- I think Senator Thune said something and  
2 you -- he said something kind of like about -- I'm going to butcher this -- Tuberville  
3 making -- like, "Oh, he should just acknowledge that the President lost," and I'm  
4 paraphrasing. But as soon as that came out, you texted somebody and said, "Can we  
5 get an ad up like immediately, right, like criticizing that?"

6 And in terms of the conversations that you had with the attorney generals -- well,  
7 let me ask this a different way.

8 Do you frequently talk to States' attorney generals that the conversations are that  
9 unmemorable?

10 A I do frequently speak with AGs.

11 Q How often?

12 A Very often.

13 Q Okay. And specifically there in early December when you're having the  
14 conversations with them, do you know what the amicus brief is about, what General  
15 Paxton was filing?

16 A I think at that time I had some sort of understanding, but I don't really know  
17 what an amicus brief is.

18 Q But you wouldn't have picked up the phone and called West Virginia or  
19 Utah's attorney generals without understanding the ramifications and its importance,  
20 would you?

21 A I think so. I trust Ken Paxton. So, like, if it was something that he  
22 believed was a good thing to be doing, then -- and there were a number of AGs that were  
23 on board with it. So that's not -- I'm not an attorney, so it wasn't my role to analyze the  
24 lawsuit or amicus brief. I'm not sure what the difference is.

25 Q No, no. I get that. I guess what I'm confused by -- and I don't want to

1 make this more complicated than it needs to be -- but it sounded like Attorney General  
2 Paxton filed amicus briefs that basically made certain legal arguments that would have  
3 supported President Trump and then you called other attorney generals to try to get  
4 them to sign on to those amicus briefs.

5 Wasn't there an element of advocacy to that, that you were calling the other  
6 States to sign on to something? And didn't you have to understand what you were  
7 advocating for?

8 A I don't recall it being just advocacy and more calling to see what a, like,  
9 status was if I was calling an AG. It could have been that they had already signed on or  
10 were planning to sign on.

11 Q But why would he have you do that and not a staff member to just call and  
12 check and say, "Hey, where are you at?" There's just something about it that  
13 doesn't -- you offered to help. So what was your help? Because helping to check on  
14 the status is like --

15 A Right.

16 Q -- is a staff member job.

17 I can see from your texts you are very persuasive, right? Like, you're a very good  
18 fundraiser. So wasn't part of why you were calling -- like, the help that you were  
19 providing General Paxton when you were calling these States, wasn't it to convince them  
20 to sign on to the brief with General Paxton?

21 A It would depend on what AG we're talking about specifically. And I  
22 mentioned I don't remember from one year ago what the status was or which AGs that I  
23 did talk to. And so if I called someone and they said, "Oh, I've already signed on," or "I  
24 am signing on."

25 Q Okay. Maybe I'm not -- and I'm really not trying to make this -- all we're



1 trying to understand is, at the time after you spoke with Attorney General Paxton, when  
2 you called other AGs, was your goal to try to convince them to sign on to the brief with  
3 AG Paxton?

4 A I think it would be fair to say that during that time they wanted to show a  
5 large number of people signed on to an amicus brief. And so I think that a goal would  
6 have been to have as many AGs as possible on that.

7 Q Because if he starts and he's alone, that looks bad, right? But if it's a bunch  
8 of States that are signing on with him, then it looks like a lot of States agree.

9 So it makes perfect sense to reach out to somebody with persuasive skills and say,  
10 "Hey, can you help us call these AGs?" you call AGs.

11 And that's all we're trying to understand, is that it sounded like the relationship  
12 was, regardless of the sequence, you wanted to help, you reached out to Paxton, he says,  
13 "I need other people to sign on to this because if Texas is the only one in the wind, it  
14 looks bad." And you reach out to West Virginia, Utah, possibly other States to try to get  
15 them to sign on to the brief. Is that fair?

16 Mr. Parrish. Objection, form. There's so many statements in there. If you  
17 want to ask a question that's a straightforward question, you can.

18           . Do you understand the question?

19 Mr. Parrish. But you've made ten statements and maybe three questions in  
20 there.

21 BY           :

22 Q Did you not understand the question? I thought you understood the  
23 question. But I can clarify if you need me to.

24 A I understood where you were going, but I think throughout certain of those  
25 I've expressed that there are parts of it that I, like, recall the specifics on, so --

1 Q And that's fine. I'm not literally saying, "What did you say to the AG of  
2 West Virginia?" We're literally just trying to understand -- and I think we do -- that your  
3 offer to help was to call other AGs to try to get them to sign on with AG Paxton. Is that  
4 an accurate summary?

5 A I think that seems like an accurate summary. What I want to be clear,  
6 though, like I wouldn't have gone into the legal merits of something. Like I don't  
7 know -- I still don't know what an amicus brief is.

8 Q I'm not sitting here saying that you went paragraph by paragraph on the  
9 constitutionality. So let me be clear, I'm literally just saying -- oh, sorry.

10 Ms. Cheney. I've got a question.

11 Ms. Wren, when you reached out to these AGs, how did you represent yourself?

12 The Witness. I didn't have to represent myself in a certain capacity. I've known  
13 these AGs for a long time. So many of them I had fundraised for, for their own  
14 campaigns, when I had my firm. And then they knew that I had worked for Trump in a  
15 capacity, too.

16 So it wasn't, "Let me" -- "I'm Caroline Wren with the Trump campaign," or  
17 something. It's, "Hey, I'm Caroline Wren and I'm someone that you've spoken to, like,  
18 once a month for 3 years."

19 Ms. Cheney. And when you spoke to them once a month for 3 years, it would  
20 have been in a fundraising capacity.

21 The Witness. No. Many of them I considered to be friends and I speak to them  
22 often about things, about their personal lives, my personal life, fundraising, politics in  
23 general.

24 Ms. Cheney. Thank you.

25 BY [REDACTED]:

1 Q And did you become aware that the President moved to intervene in the  
2 case himself?

3 A I don't know what that means.

4 Q That he wanted to participate in a lawsuit, President Trump?

5 A I don't know what that means.

6 Q Did you know that he tried to just be involved in the lawsuit, President  
7 Trump, personally? You don't know or not?

8 A No. As I've mentioned, like, I don't even know what an amicus brief is  
9 versus a lawsuit. So I don't understand with Trump.

10 Q Not that particular. Okay.

11 A So, no, I don't know that. I don't.

12 Q And Attorney General Reyes from Utah, that's his name?

13 A Right.

14 Q He did sign on to the brief. Were you aware of that?

15 A As I mentioned earlier, I wasn't aware of what he ultimately did.

16 Q And Patrick Morrisey is from West Virginia?

17 A Yes.

18 Q And he did sign on? Yes? You don't know?

19 Mr. Rowley. If you know.

20 The Witness. I remember that my conversation with him was about how he was  
21 [REDACTED] and he was going to talk to someone in his office.

22 BY [REDACTED]:

23 Q Okay. And were you aware of the tweets that President Trump was doing  
24 at the time after General Paxton filed, but before these other States signed on,  
25 encouraging other States to join?

1           A    I would imagine I would've seen tweets to that effect.

2           Q    Do you remember that?

3           A    No.

4           Q    Is that something you would've naturally brought up to the attorneys  
5 general, that the President was focused on this and was tweeting on it if he was?

6           A    The President would tweet a number of different things every day. And so  
7 I'm sure that these AGs' own staff would have seen that.

8                    But also it wouldn't be a -- I don't recall any specifics and it wasn't in any of my  
9 documents, but it wouldn't shock me if I had shared like a screen shot or a President's  
10 tweet with someone that was talking about that if that was the context of the  
11 conversation I was having.

12           ██████████. I guess let me ask you this, and it goes kind of to Representative  
13 Cheney's question in terms of how you were representing yourself. Because for a while  
14 you were on the Trump campaign, you have relationships we'll talk about later with some  
15 people who are very close to the campaign or possibly even family.

16                    And I'm trying to picture these calls with the AGs where, you know, and as  
17 lawyers, like, amicus briefs are boring, right?

18                    But if you're not talking with them about the legalities of it and you're not talking  
19 about fundraising and you have these personal relationships, is there a -- are you  
20 representing, you know, as a Trump person in Trump world, friendly with the Trumps,  
21 like, "This is something that you should do."

22                    The Witness. No. There's no reason for me to, like, represent myself in a  
23 certain way. As I mentioned, like, I know these AGs very well. Like the attorney  
24 general of Utah, I spent Easter with him and hosted him at my country club. Like, so  
25 we're not -- I don't have to call and say -- that's not a conversation or an introduction that

1 I would have with them. Like, they've known me for a very long time.

2 [REDACTED]. Yeah. I guess -- I guess -- and I hate -- I hate -- I don't mean to beat a  
3 dead horse, I really don't, but when you say, like, I don't know the legalities and it's not  
4 about fundraising and I don't really understand what amicus briefs are, then I'm kind of  
5 like then what is the content of the conversation of why they should sign on to the briefs  
6 with AG Paxton other than to support President Trump? Like what's left?

7 Mr. Rowley. Didn't she already say that she was checking on status when she  
8 called these AGs?

9 The Witness. I talk to AGs often. So if I talked to the Utah AG, I don't know,  
10 like I probably would've covered a number of topics and it could have been, "Are you  
11 doing? Are you signing on?"

12 I also could have asked -- called to ask him for counsel, like, "Is this a good  
13 lawsuit? Is this a good idea? Have you looked at it?"

14 And that's what I'm saying. I don't know. I don't recall from one year ago, like,  
15 what he would've said. The only specific conversation I recall having was Morrisey

16 [REDACTED]

17 [REDACTED]

1

2 [10:59 a.m.]

3 [REDACTED]. Okay. I totally under understand that.

4 Are there any other questions on that topic?

5 [REDACTED]. No.

6 [REDACTED]. Any from the Representatives?

7 Ms. Cheney. Ms. Wren, just to understand, how did the amicus brief come to  
8 your attention?9 The Witness. I do not recall.10 Ms. Cheney. And I appreciate that you're not an attorney, and you were not  
11 familiar with what an amicus brief is. So, when you were making calls to States  
12 attorneys general, you were asking them to sign on to something, but you weren't  
13 familiar with what it was?14 The Witness. No, that's not what I said. I didn't say that I was calling to ask  
15 them to sign on to something. As I mentioned, I don't recall the conversations with each  
16 of them. It could have been asking their opinion of what they thought about it. It  
17 could have been asking the status.18 Ms. Cheney. Thank you.

19 BY [REDACTED]:

20 Q And, just going to your time with the campaign, there were three individuals  
21 that I think you hired to work with you, I think on the side on January 6th. I think they  
22 worked with you on the campaign. I'm going to try to pronounce their name, Cassidy  
23 Kofen (ph)?

24 A Kofoed (ph).

25 Q Kiera Schaefer (ph) and Maggie Mulvaney?

1 A Yes.

2 Q Can you tell me what their roles were on the campaign?

3 A Maggie was the director of finance operations. Kiera (ph) did finance  
4 advance, is what we call it. And Cassidy (ph) was an intern that we then -- I actually  
5 don't know if she ever -- if she was a staffer or an intern -- a staff assistant or something.

6 Q And I know you said you didn't supervise anyone. How did you know those  
7 women from the campaign?

8 A They were in my department.

9 Q The finance department?

10 A Yep.

11 Q And did you just call them after the election and say, "Hey, I, have this event,  
12 do you want to work it"?

13 A No. It would have been. I don't remember the specifics of the timing  
14 with each of the three, but I think it wouldn't have been until probably early January that  
15 I would have asked any of them. And it was to help me with the registration desk that  
16 morning.

17 Q Okay. And we'll come back to that later.

18 Okay. So let's talk about, in terms of the events leading up to the rally, there was  
19 a tweet that the President made on December 19th, and, unfortunately, his account was  
20 shut down. So I'm just going to read it, but it was sometimes referred to as the  
21 WildProtest tweet. I think you may have a copy in your original PowerPoint. But it is  
22 basically the one that says: Peter Navarro releases 36-page report alleging election  
23 fraud. More than sufficient to swing victory to Trump. A great report by Peter.  
24 Statistically impossible to have lost the 2020 election. Big protest in D.C. on January 6th.  
25 Be there. Will be wild.

1 Do you have any idea how this tweet comes about?

2 A No.

3 Q Okay. Were you in touch with anyone at that time in the White House or  
4 on the Trump campaign about the event -- an event on January 6th?

5 A No.

6 Q Okay. Had you talked with anybody from Women for America First or  
7 anybody in relation to an event on January 6th?

8 A Not until the email, the info went out on the 26th or 27th.

9 Q Okay. So you don't -- you don't hear from anyone at all, but there's an  
10 event on January 6th at the time of that tweet?

11 A My recollection of hearing of an event on January 6th would have been likely  
12 on the 22nd, from Julie. Now, as I mentioned before, I obviously would follow the  
13 President's tweets. And so I'm not saying, like, I didn't see that or something, but I -- I  
14 don't remember ever like knowing of some rally or anything that the President was -- I  
15 wouldn't even say the President was going to attend because, on the 22nd, when I heard  
16 about this, I didn't really have any expectation of the President attending.

17 Q I'm sorry to interrupt you. I just need to note that Representatives Lofgren  
18 and Murphy joined on the Webex.

19 I think you're referring to exhibit 3. Can you turn to that one? And let's just  
20 make sure I'm thinking of the right thing.

21 A Yes.

22 Q So this is an email on December 22nd to Schuyler Long, and that's somebody  
23 who works for Julie Fancelli, right?

24 A That's right.

25 Q Now, in the email, you say: I wanted to follow up with you regarding the



1 Million MAGA March on January 6th. You've already heard about it at that point.

2 A Julie had called and told me about it. And so then she had asked me to  
3 follow up with her, but she wasn't that much of an email person. So I had left the  
4 conversation by saying: Okay. I'll try to put together a proposal or something in  
5 relation to this. So this is me following up regarding the Million MAGA March on  
6 January 6th.

7 Q And do you have idea, and I know it was a while ago, but can you remember  
8 how long before that email on the 22nd you had the conversation with Ms. Fancelli?

9 A I -- I don't. So because, during that time, I was talking to Ms. Fancelli quite  
10 often. So I just -- I don't know when in that window I would have learned about it, but  
11 to make a memo like that, it probably would have taken me a day, but this was at 6 p.m.  
12 So it could have been at 9 a.m. that I talked to her and then made it that day, or it could  
13 have been the day before.

14 Q Okay. But you don't think it was like a week before?

15 A No, no.

16 Q Just like a day or two?

17 A Yeah.

18 Q And can you tell me, how do you -- when do you remember getting first  
19 involved with Ms. Fancelli?

20 A I don't necessarily remember. I think -- I think I may have spoken to her for  
21 the first time sometime like late 2019 or early 2020.

22 Q And can you just tell me, like, how did that come to be? Did she find you?  
23 Did you call her?

24 A I called her.

25 Q Did somebody direct you to call her?

1           A    No.  A lot of what my focus was on during fundraising at that time was to  
2 find what we call lapsed donors.  And lapsed donors would be someone who donated  
3 significantly at some point to the President.  So they donated in, like, 2016 or 2017 or  
4 2015 -- well, not really 2015 -- and then hadn't given, you know, during a certain time.  
5 And so, she -- I think it was one I identified that had given earlier and then hadn't really  
6 given again.  And so that's why I was saying sometime probably in 2019 or 2020 is when  
7 I would have called her and got her on the line and said, you know, would you be willing  
8 to donate?

9           Q    So is -- this email, is this how you kind of get started even thinking about the  
10 Million MAGA March?

11          A    Yes.

12          Ms. Cheney.  I have another question.

13          [REDACTED].  Yes.

14          Ms. Cheney.  Ms. Wren, from the period of the election to January 6th, which  
15 entities were you fundraising for?

16          The Witness.  None.  The only was Save the U.S. Senate PAC, that -- well, it's  
17 difficult to say because I -- when we get to January 6th, remember that was where, like,  
18 Turning Point and this other came in.  But see -- that's a tough question to answer.

19          Like, in November, I think maybe -- I don't know when Save the U.S. Senate PAC  
20 was formed, but it may have been then, but otherwise like nothing really in November.  
21 And then, in December, that was -- I may have solicited some others to, like, come to  
22 Charlie Kirk's event for Turning Point.  And other than that, like, there wasn't really  
23 much.

24          Ms. Cheney.  So just those two were the only ones you were soliciting funds for  
25 after the election?

1           The Witness. I think so, until I -- up until then with the Republican Attorneys  
2 General Association. I was planning to reassign them as a client, but I believe that Julie  
3 Fancelli was the first person I approached to give to RAGA.

4           Ms. Cheney. And then when you were doing the donor maintenance that you  
5 described earlier, who was giving you the names of people to contact?

6           The Witness. No one was. My phone -- I would get 100 calls a day probably.  
7 If you see the screen shots of the text messages in all these exhibits, you can see I usually  
8 have between 580 to 700 unread text messages on any given day.

9           Ms. Cheney. Were you in touch with Kimberly Guilfoyle during this period?

10          The Witness. Yes.

11          Ms. Cheney. And was she giving you names of people to contact?

12          The Witness. If Kimberly called me and said, "Hey, would you call x person, they  
13 had a question for you," I would have done it. But it wasn't -- we weren't like coming up  
14 with lists to say, oh, we need to contact this person for any particular reason. It was  
15 much more of the outreach coming to us of people saying, you know, what's going on?  
16 Can you give me updates?

17          Ms. Cheney. Thank you.

18                   BY [REDACTED]:

19          Q    And so, turning back to your conversations with Ms. Fancelli in terms of  
20 fundraising for an event --

21          A    Right.

22          Q    Is it your understanding that she wants to basically put on or help an event  
23 on the 6th?

24          A    That had to be specific to, at this time, on the 22nd, which is the first time in  
25 my records that I knew about something. The memo attached is kind of an interesting

1 one because I -- I what I remember about it is that her telling -- calling me about an event  
2 on the 6th but no context as to what it was. And then how much would it cost to -- she  
3 wanted to see a lot of people there in D.C., so how much would that cost? And so the  
4 memo that I made, it was kind of a scaling of what the budgets would be for bussing, but  
5 I've never been involved in anything related to bussing. So I would have had to have  
6 asked others and then kind of put it into a math equation, and that's why you saw this  
7 sort of scaling budget because she never -- she didn't indicate how much she wanted to  
8 give. And I didn't really do any followup research on it other than provide this. And  
9 then the response was, you know, thank you, this is up in the air. And then we -- we  
10 went into Christmas; we didn't really talk. And then I met with her on the 26th.

11 Q Who did you -- a moment ago, I think you said that you would have reached  
12 out to some people for help. Who did you reach out to help you put together this  
13 Million MAGA March overview?

14 A Taylor Budowich.

15 Q I'm sorry?

16 A Taylor Budowich.

17 Q Budowich. I've been pronouncing that wrong. Okay. Thank you.

18 And what conversations did you have with him in terms of preparing that  
19 overview?

20 A He had worked -- I knew he had worked at Tea Party Express before and had  
21 run a bus tour. And so I had no idea if a bus costs \$100 or \$10,000. So it was a basic  
22 conversation of, how many people -- how hard is it to contract buses, you know? Like, if  
23 we wanted a 100 buses, could we even find 100 buses, or is it 20? And what do they  
24 cost? And so just kind of basic level conversations like that.

25 Q And does he say anything about anybody that he would use for the buses or

1 that Tea Party Express would do the buses?

2 A We did not go into like vendor conversations at that time. I'm sure I would  
3 have said: If she wants to move forward with this plan, would you be able to execute it?  
4 Because executing a bus plan is not something I do. But I don't recall having a  
5 conversation about Tea Party Express being the vendor to use because it was unclear like  
6 what exactly Julie wanted to do with this.

7 Q Is it fair to say that your conversation with him would have been focused on  
8 what's a reasonable number to propose for buses, like more focused on kind of like the  
9 amount needed as opposed to the mechanics of the bussing?

10 A Um, no, because I think that -- I don't have it in front of me -- I think it starts  
11 at maybe around 25,000 and goes up to, like, 250,000? 30,000? Yeah. So she  
12 never -- she never indicated how much she wanted to spend at all. So that's why it's  
13 such a wide -- 30,000 to 500,000. I just wanted to be able to show her, like, this is  
14 what -- if the objective is to get as many people, then, this, I guess, is like what an outline  
15 could look like. But I hadn't started to think further of how to actually execute this  
16 because she hadn't indicated on -- she hadn't signed off or anything like.

17 Q When she starts having -- actually, let me step back for a second. At this  
18 point, what do you see your role when you're having conversations with her in terms of  
19 what she wants you to do for January 6th for her?

20 A Right. I don't view my relationship with donors as a, like, role specific to  
21 them. I -- when I mention the term "donor maintenance," donors call me all the time  
22 asking for help on a number of different things. And I -- I help them often on things like  
23 that. So, I -- I think, for a project like this, if she had signed off and given a budget on  
24 what that was, then I would have identified a group to be able to do it. I probably would  
25 have asked Taylor to be in charge of, like, the bussing systems since it's not what I do.

1 And then just made sure that it flowed correctly and that the funding that Ms. Fancelli  
2 intended for was spent wisely.

3 Q So, to that point, at some point, there are a number of organizations that are  
4 involved where funds go out to Women for America First, Turning Point, et cetera. How  
5 did that come to pass? Like, who decides that those organizations get the money for  
6 those tasks?

7 A Are we now just going specifically into how the funding ended up being  
8 chosen for Ms. Fancelli?

9 Q Yes.

10 A Can I get the -- is the budget --

11 Q I'm sorry. There was an issue with the way they came in. You may have it  
12 easier than we do.

13 A Okay. So you wanted to jump to -- your question is, why were these  
14 organizations chosen --

15 Q Right.

16 A -- for funding?

17 Q Yeah. Why is Tea Party -- why is Turning Point chosen, Tea Party, Turning  
18 Point, RAGA, Women for America First? Why do they get money?

19 Mr. Parrish. From Ms. Fancelli?

20 [REDACTED]. From Ms. Fancelli.

21 The Witness. It would be easier for me if I could just give the background on  
22 each one of those.

23 BY [REDACTED]:

24 Q Sure.

25 A So, as we mentioned, I met with her on the 26th, and we talked about a

1 number of different, like, funding priorities that she had. So the followup document  
2 that I sent to her incorporates things from that meeting. The first would have been  
3 Turning Point action. And so, at the beginning of our conversation, we talked about  
4 those text messages with Charlie Kirk, like that was one I had identified that I thought Ms.  
5 Fancelli would like to support. She had heard of Charlie. And so I was wanting her to  
6 go to the conference. She was unable to go to the conference. And so, when I went to  
7 go meet with her that day, I was expecting to talk about a few different things, but one  
8 was to talk to her about Turning Point USA and the work that they do and set up a call  
9 between her and Charlie. So that was one of first conversations that we had.

10 During that conversation, that's where she went in a bit more about how she has  
11 grandchildren. This is a funding priority for her. I think we talked about a new  
12 program Charlie started, called Turning Point Faith, that focuses on registering voters in  
13 their churches. And that's something that Ms. Fancelli would have felt strongly about.  
14 And so I reached out to Charlie even during that meeting to see if he could do a call with  
15 her, and he was on a plane, and they ended up connecting. And that is where she  
16 ended up committing a million dollars to Turning Point, one of the entities. And, over  
17 the next several days, that's where there's discussions of, is it the (c)(4) or the (c)(3),  
18 and -- but that million I, think that if you would -- the January 6th had never happened or  
19 solicited, like, I think she would have donated to 1 million to Charlie Kirk anyway. Like,  
20 that was a priority to her. It was something that she wanted to do. And it was  
21 something that I had gone over there to talk to her about.

22 The second is Save U.S. Senate PAC. That was one where she had already given I  
23 think at this point probably 250,000 early sometime in November or December. And  
24 then that was the other, like, the thing that I went over there and wanted to talk to her  
25 about specifically, and said this is incredibly important. The balance of the Senate is on

1 the line. And so she had told me, you know, while that wasn't her top priority, you  
2 know, she trusted me and if that's where she felt like funding should go, that she would  
3 be happy to do it. And so I think from this document I'm looking at, this was a  
4 recommendation I gave to her. So then she gave notes back and reviewed. So I don't  
5 think she did 500,000. I think it was less. But then the total she ended up giving it was  
6 about 850,000 to Save U.S. Senate PAC. And Save the U.S. Senate PAC had nothing to  
7 do with the rally. It was just, like, the Georgia race was the day before so we were in  
8 that pocket of time.

9 Then Tea Party Express, that was where, when we started to talk about January  
10 6th and one of her objectives or goals was to get as many people there as possible, which  
11 was reflected in the Million MAGA March memo, that's where Tea Party Express was a  
12 vendor that I recommended because they had experience in bussing. And then -- do  
13 you want me to just go one by one?

14 Q Uh-huh.

15 A Alex Jones was one I ended up on -- I think this was the day -- I think this was  
16 the day -- the 27th, I'm not positive, but she had called, someone in her office had called,  
17 I believe like the Infowars hotline or something and someone had called back. She was  
18 calling --

19 Q We can come back to that because that's going to be a larger conversation --

20 A -- so then Rule of Law Defense Fund RAGA, was -- I would say kind of similar  
21 to Turning Point or Save the U.S. Senate to where election integrity was important, or so  
22 it was just the rule of law in general. And, at this point, a talking point that I was having  
23 with donors was, look, we are most likely going to have no chambers of government over  
24 the next 2 years, I mean, unless we won Georgia. So, you know, the last line of defense  
25 is the AGs, and I think that there are some fights going on -- between corporate board



1 rooms, government, and the AGs are kind of the last -- and so this should be a priority for  
2 anyone. And so she I don't think had heard of that entity or organization before, but I  
3 certainly thought they were a great and worthy of funding and matched up to what her  
4 priorities would be. And so that is why they were recommended like during this period  
5 of time and in that meeting that I had with her. The \$50,000 for Bluebonnet Fundraising  
6 LLC was a number that Julie had proposed, and that was actually to mainly retain these  
7 for the year to do donor advisement for her and then also to help execute things for the  
8 rally.

9 Women for America First was, that to me, there to figure out who the permit  
10 holder was and though the \$300,000 was meant to pay for the audio, staging, lighting,  
11 infrastructure of the rally, and since they were the permit holder, that made the most  
12 sense as to where that funding would go.

13 Q And let me just pause for a second. Tea Party Express, did Taylor Budowich  
14 recommend them to you?

15 A Yes.

16 Q Okay. And, at the time that he did that, were you aware that he was a  
17 fundraiser for them that would receive a commission on the funds raised?

18 A Well, Taylor is not a fundraiser, but I don't know if he told me that he would  
19 have received a commission, but he probably -- we have a pretty open relationship, and I  
20 wouldn't have had any issue with that if he had. Especially if he was going to, like, help  
21 execute the program of which that funding was going. I mean, like, so I don't know the  
22 difference between commission or just hiring to, like, execute during that time. I would  
23 have had no issue with him being the -- but once the money goes to that organization, it  
24 is not really my job to dictate where they spend.

25 Q And I guess that's -- maybe I will ask the question a little differently. Was it

1 your understanding at the time that Taylor Budowich would make some kind of money  
2 when the Tea Party Express was paid from this?

3 A I don't -- I don't recall the answer to that, because I do remember  
4 recommending that Taylor be paid by Women for America First. I just don't remember  
5 any conversation specific to if he would be paid by Tea Party Express.

6 Q Okay. So, to the extent that he was paid by Tea Party Express, you don't  
7 know, but it wouldn't surprise you if he was?

8 A Yeah. Right.

9 Q Okay. And, for the Rule of Law Defense Fund, I think if you look at exhibit  
10 1, you had produced to us some of these you had, I believe, fundraising relationships  
11 with. And I don't want to mischaracterize so maybe you give me the words --

12 A Correct.

13 Q -- for what that is, but you had produced this invoice where Rule of Law  
14 Defense Fund was paying you \$12,000. Is it wrong if I call it a commission?

15 A No. Commission is correct.

16 Q Commission is correct. So a fundraising commission. So you would have  
17 received \$12,000 from the Rule of Law Defense Fund receiving the \$150,000 donation  
18 from Ms. Fancelli?

19 A Correct.

20 Q Okay. And then, for exhibit 2, this is the -- you would have received  
21 \$50,000 for the commission off of the million dollars that Ms. Fancelli gave to Turning  
22 Point?

23 A Right.

24 Q And the Turning Point has a 5-percent commission whereas Rule of Law  
25 Defense Fund has 8-percent commission?

1 A Right.

2 Q Is that something that you just negotiate with them?

3 A Yes. So it is within my, like, contract. So my contract with Rule of Law  
4 Defense Fund RAGA is 8 percent, Turning Point 5 percent, Save the U.S. Senate PAC I think  
5 was 10 or maybe 12 percent. So usually the commissions range between 5 and like 15  
6 percent on any client.

7 Q And did you receive a commission from the funds that you raised for the  
8 Save the U.S. Senate PAC?

9 A Yes.

10 Q And do you remember how much that was?

11 A I don't.

12 Q If I said \$86,450 would that sound right?

13 A That would. I just -- I don't know the percentage. I think it would have  
14 between 10 -- something between 10 and 15 percent.

15 Q And I think you said they had done \$850,000 total so that would be  
16 somewhere between -- what did you say, 8 and 10 percent?

17 A Well, then it would be less because I -- I -- I raised funds other than just  
18 Ms. Fan -- like, Julie gave 850,000 to Save the U.S. Senate PAC. But I didn't -- a number  
19 of other people gave. I don't remember the total we ended up raising, but any  
20 donations that I directly solicit I'm paid a commission on. So, if the total number and I  
21 just -- I didn't really have this in front of me -- is 87,000 around that, then the commission  
22 would have been probably between 5 and 8 percent.

23 Q Okay. And it's possible that that number was earlier one. And then I  
24 think you said the number got changed. And so it would have been 5 to 8 percent off of  
25 the 850?

1           A    Right.  Yeah.  But I was saying that I -- like, I raised from a number of  
2  people --

3           Q    I was literally just talking about Ms. Fancelli.

4           A    Right.

5           Q    I was under -- I thought you were saying you make 5 to 8 percent on the  
6  commission for her donation.  I was just focusing on that donation.  It would have  
7  been 5 to 8 percent of the 850 total.

8           A    Yes.  But I don't -- it's somewhere between 5 and 10 percent so --

9           Q    That's fair.  We can find the exact number.

10          A    Right.

11          Q    That's roughly, that's roughly what I had.

12                And then so I want to make sure I understand.  So there was a \$12,000  
13  commission from the Rule of Law Defense Fund, the \$50,000 commission from Turning  
14  Point Association, the \$50,000 direct payment from Ms. Fancelli for Bluebonnet  
15  Fundraising for the year.  And then whatever the exact commission was off of the  
16  \$850,000 that she paid in total -- donated to the Save the U.S. Senate.  That is the funds  
17  that you would have made off of Ms. Fancelli's donations, correct?

18                Commissions -- apologies.

19          A    Yes, during this window of time.

20          Q    Great.  Just for Save the U.S. Senate and the January 6th event?

21          A    No, I would like to correct for the record, I mentioned earlier that, if January  
22  6th event didn't exist, I think Julie still would have given \$1 million to Turning Point, and I  
23  still probably would have solicited her and she would have given to the Rule of Law  
24  Defense Fund because, like, those were in relation to, like, the work that they were  
25  doing -- like, Turning Point wasn't doing any work in relation to January 6th.

1 Q And I'm sorry; I didn't mean to take it into the realm of hypothetical.

2 A Yes.

3 Q I'm saying, like, what happened in your discussions around --

4 A Right.

5 Q -- January 6th? Were these donations and those were the commissions?

6 A Yes.

7 Q Okay. And did you make a commission off of the \$300,000 that was given  
8 to Women for America First?

9 A No.

10 Q Okay.

11 A And nothing for Tea Party Express either.

12 Q All right.

13 A Or Alex Jones Free Speech, like those weren't clients.

14 Q Got it.

15 [REDACTED]. Do you have any questions on that?

16 BY [REDACTED]:

17 Q Just to be clear, when it comes to the January 6th rally, Ms. Fancelli  
18 brought you in in regards to planning that event?

19 A She did.

20 Q Okay. And it was around December 22nd, that's the day that you were  
21 brought in, per se, to the January 6th rally planning?

22 A That was the day that I became aware of it.

23 Q Okay. And, before that, you said you had worked with Ms. Guilfoyle. She  
24 hadn't mentioned January 6th to you before Ms. Fancelli reached out?

25 A Because I don't think Ms. Guilfoyle was aware of a January 6th event until

1 like late December.

2 BY [REDACTED]:

3 Q I just have this: What did Ms. Fancelli tell you about January 6th? She  
4 calls you; she says what about it?

5 A The initial conversation on the 22nd I didn't really remember until I was like  
6 doing -- I thought the first time I had heard about it was the 26th until I started preparing  
7 documents for you and found that memo on the 22nd. So I -- I think, during that time,  
8 like I had no idea what the event was for, I was just making a memo based on bussing to  
9 like bring people to some sort of event. And then on the 26th is where I first heard  
10 more about what it was and --

11 Q So, on the 22nd, the best you can remember, did Ms. Fancelli tell you how  
12 she became aware of the event?

13 A She did not. But I -- she didn't -- the first time I recall her telling me  
14 how -- her knowledge of this event would have been on the 26th.

15 Q But she specifically asked you to invest the time to come up with a budget  
16 proposal for the 6th on that call on December 22nd.

17 A Yes.

18 Q Okay. If you look at exhibit 3, your email exchange with Schuyler Long.

19 A Yep.

20 Q At the bottom, you see where Schuyler responds to you on December 23rd  
21 at 9:25 a.m.?

22 A Yep.

23 Q And the second sentence of her response to you is: Right now it's up in the  
24 air as to whether Julie will load -- load in for the D.C. events.

25 A Right.

1 Q What did you understand that to mean?

2 A She wanted to go. So part of -- like my involvement would have been, if  
3 she came to D.C. to attend this, that memo again -- would have been to make sure that  
4 she -- I helped her with like travel logistics and things because she's older. And so, like,  
5 hotels and arranging dinners and meetings -- making it kind of an experience.

6 Q So "load in" was about her coming to D.C., not --

7 A Right.

8 Q -- about whether she would fund the event in D.C.?

9 A I think -- I -- this is Schuylar's language, not mine. So I guess "load in" could  
10 be interpreted both ways, and I'm not sure which way he meant it. It could have  
11 meant, if she -- whether or not she'll donate or want to even do this program, or it could  
12 mean attendance, and I'm not -- it's kind of unclear here.

13 Q Fair enough. But, with your experience with Ms. Fancelli, was there ever a  
14 doubt in dealing with her that she wanted to fund the events on January 6th?

15 Mr. Parrish. Objection, form. By "the events" you mean the event at the  
16 Ellipse?

17 [REDACTED] Yes.

18 The Witness. Yes. I guess it's -- this here on the 22nd was my understanding  
19 was that there was a Million MAGA March on January 6th and that she wanted to help  
20 drive up attendance and also attend. So, in mine, I put in there different options to help  
21 with travel logistics and increase logistics. Travel logistics would have meant specific for  
22 her to attend and increase attendance would have meant the bussing program.

23 [REDACTED]. Okay. Thanks.

24 BY [REDACTED]:

25 Q I'm sorry. Do you mind if I ask you a quick question, Ms. Wren? Did Ms.

1 Fancelli indicate whether someone else had spoken to her about the event, whether from  
2 the RNC or the Trump campaign, before she spoke to you about funding it?

3 A I do not recall her -- having a conversation with her about that.

4 Q Did she express to you why she thought the event would need funding?  
5 And I want to set the timeline; you have the Trump Tweet on December 19th. Did she  
6 express why, after the President announced this, she thinks the event would even need  
7 funding at all as opposed to already having a source of funding?

8 A I can't speak to Ms. Fancelli's mind-set on December 19th. I can speak  
9 to -- that I don't recall her ever being on Twitter so I don't -- I'd be very surprised if -- if  
10 the President would have tweeted it, that would have then made it to Julie and that  
11 would have been why she did something. Like, she wasn't -- she never shared tweets  
12 with me, to my recollection, and so I don't.

13 Q So did she express otherwise why she thought the event on January 6th  
14 needed funding just 2 days after the President tweeted out whether or not she knew  
15 about the tweet.

16 Mr. Parrish. And, by "event," you're referring to the Ellipse rally?

17 [REDACTED]. Of the 6th, yes.

18 The Witness. I -- I can't speak to that. The first recollection I have of her  
19 mentioning why or how she heard of this was on the 26th when she said she heard about  
20 it on Alex Jones' show. So I don't remember the conversation on the 22nd over the  
21 phone, like as --

22 BY [REDACTED]:

23 Q But you did mention that Ms. Fancelli was on the lapsed donor list, correct?

24 A Right.

25 Q So did it seem odd to you that, after being a lapsed donor, she's the one who



1 initiates the funding of an event that she's heard about? Did that seem odd to you at  
2 the time?

3 A Well, I have to break that -- she was a lapsed donor meaning she had  
4 donated sometime in 2016 or 2017 and had not donated maybe in the year of 2018, and  
5 so she was on a list that I found to call, to solicit, to donate to Trump victory sometime in  
6 late 2019 or 2020. So, like, those two are not related at all. She never wavered in her  
7 support of President Trump and just probably -- she hadn't just, you know, gone online to  
8 randomly contribute \$100,000 or something. So that was just speaking towards when I  
9 had met her. So I just don't know what the lapsed donor thing has to do with now into  
10 December 26th.

11 Q Well, what I'm getting is that if she was a lapsed donor even just for the prior  
12 year or 2, is your testimony that, when she reached out about funding the 6th, you don't  
13 remember any conversation besides a Alex Jones' reference as to why she was initiating  
14 the funding with you?

15 A Well, she had been a lapsed donor, but then she did donate. Like, and I  
16 don't remember the to Trump victory. She probably just didn't donate in the year 2018  
17 or something like that, but I think she gave in 2019 or 2020. So, going into the 6th, she  
18 was not a lapsed donor; she was a current donor I guess in that term. And then I  
19 remained in contact with her, as well as many other donors, throughout November and  
20 December. And then the first time she brought up, like, this specific rally to me,  
21 obviously would have been the 22nd, but my first recollection of a discussion as to how  
22 she heard about it would have been on the 26th when she told me she heard about it on  
23 Alex Jones' show.

24 Q And just the last question, are you aware of anyone connected to the RNC,  
25 or the Trump campaign, or the victory fund who reached out to Ms. Fancelli regarding

1 January 6th before you spoke with her on December 26th?

2 A I'm not.

3 [REDACTED]. Thank you.

4 Ms. Cheney. I have a question.

5 Ms. Wren, you said that Ms. Fancelli appeared on a lapsed donor list you found.

6 Where do you find it?

7 The Witness. I would pull those --those sets of donor lists through the FEC  
8 usually.

9 Ms. Cheney. So you just did a donor list through the FEC and found Ms. Fancelli's  
10 name on that?

11 The Witness. Yes.

12 Ms. Cheney. No one gave you the name? No one gave you the list. You just  
13 did a search and came up with --

14 The Witness. No. Well, I mean, that's what I'm paid -- at that time, I was the  
15 national finance consultant. I was paid on commission to go after donors. So I'm very  
16 aggressive in doing that. So I will, you know, be pulling -- at that time, I didn't have  
17 access to, like, the Trump donor list and internal campaign database. So I would often  
18 quarterly pull past donors to Trump and people donating to similar projects and compare  
19 them up to other projects. I remember, like, her name coming up as one of those  
20 people. And then I don't know how I found her, so I can't remember; it's been 2 or 3  
21 years. But she is one that I ended up talking to and asking her to contribute again to  
22 Trump, and she did. And then we remained in contact.

23 Ms. Cheney. So had you known her previously?

24 The Witness. No. I never met her in person until December 26th.

25 Ms. Cheney. And so, when you saw that she was a lapsed donor, you just cold

1 called her?

2 The Witness. Yes.

3 Ms. Cheney. And what was your pitch to her when you did that?

4 The Witness. Would you -- usually my pitches were event-driven. So it  
5 probably would have been, would you like to come to this event at Mar-a-Lago and get  
6 your photo taken?

7 And I think, during this time when I met her, she was living in Italy. So she was  
8 there throughout COVID, was not back in the United States until November or December.  
9 So I think she was just happy to contribute. And then, like many of the other donors, I  
10 don't just ask them for money and say, goodbye, talk to you never. I've got to check in  
11 on her a couple of times a month and update here on the campaign and what was going  
12 on, and she would, you know, appreciate that. And we'd talk about her grandchildren  
13 and Italy.

14 Ms. Cheney. So did you make a particular -- a specific ask of her the first time  
15 you cold called her after finding her name on the FEC?

16 The Witness. I don't -- I don't remember. And I don't remember how much she  
17 donated, but it would have probably been, what, over 100,000.

18 Ms. Cheney. So you would just cold call somebody and ask them to write a  
19 check for \$100,000, and you never met them before, and you found their name on the  
20 FEC list.

21 The Witness. That's what I would do from -- for about 5 to 8 hours a day for the  
22 past few years. Yes.

23 Ms. Cheney. Thank you.

24 [REDACTED]. I want to go back, because on the original email, we were talking  
25 about how, on December -- on or before December 22, a day or so, you had a

1 conversation with Ms. Fancelli about her desire to do -- to participate somehow in the  
2 Million MAGA March. Do you remember the conversations that you had with  
3 Mr. Budowich after you talked with Ms. Fancelli and what Ms. Fancelli wanted to do in  
4 relation to the January 6th event?

5 Mr. Parrish. And, again, by "event" you're talking about?

6 BY [REDACTED]:

7 Q The rally. Excuse me, the Ellipse rally.

8 A I know that I called him after that conversation with Julie, and then he  
9 helped advise on, like, bussing and to scale and budgets, and I -- I think I probably would  
10 have asked him to review it, or I would have ran numbers by him. But I don't remember  
11 any detailed conversation about what it would have been. I think, even looking at my  
12 documents, like, I kind of just wrote it as a bussing project or something.

13 Q Do you remember telling him that it was for a rally on January 6th?

14 A I don't -- I don't remember what I would have referred to it as.

15 Q Would you have used Million MAGA March on January 6th with him?

16 A I don't recall, but that's obviously what I thought the name of this was.

17 Q Okay. And here's the reason I ask: Can you turn to exhibit 52?

18 This is a text between Mr. Budowich and Katrina Pierson.

19 A Right.

20 Q On December 22nd at 5:38 p.m.?

21 A Yep.

22 Q So this may have been soon after you talked with him?

23 A Right.

24 Q And he's asking Ms. Pierson, who is doing the January 6th rally?

25 A Right.

1 Q So is there a chance that he would have gotten the existence of a Jan. 6th  
2 rally from you in your conversation about the bus project?

3 A Yeah.

4 Q Okay. And then I think you -- if you turn to exhibit 53, you had talked a  
5 minute ago that you were with Ms. Fancelli, I believe, on the 26th.

6 A Correct.

7 Q And so this is you, I believe, texting with Mr. Budowich, right?

8 A Right.

9 Q And so you're at Ms. Fancelli's house at this point?

10 A Oh, yeah, I'm at Julie Fancelli's house.

11 Q Sorry. That wasn't meant to be a trick. I was just confirming that that's  
12 what you meant. You say: Guess what the budget is she just gave me for our bus  
13 project. You won't guess. \$3 million.

14 A Right.

15 Q You're talking about the Jan. 6th rally on the Ellipse? Are you talking about  
16 the Jan. 6 rally on the Ellipse?

17 A Well, I want to be careful. At this point, like I thought it was just a bussing  
18 project. So I don't know about the Ellipse or anything by this time. So I was  
19 referencing what I thought, like, there was some sort of event Julie told me about on  
20 January 6th in Washington, D.C. She wanted to get people there. Taylor and I had -- I  
21 called him to, like, make up a bus budget. And then this is where I'm at her house, and I  
22 thought, like, I thought the 500,000 was way -- the high end, Right? It started at 30,000.  
23 And then she told me that she wanted to do 3 million. So that's why I'm kind of saying  
24 to him: You won't guess how much she wants to do on this.

25 Q Right. And I guess what I am trying to get at is, in the December 22nd

1 email, you refer to it as the Million MAGA March --

2 A Right.

3 Q On January 6th.

4 A Right.

5 Q You prepare a Million MAGA March overview that envisions bussing people  
6 into a rally.

7 A Right.

8 Q Okay. You talk with Taylor Budowich --

9 A Right.

10 Q -- to get a ballpark of the bus cost to bring people into a rally?

11 A Right.

12 Q That same day, Budowich texts Pierson and says: Who is doing the Jan. 6th  
13 rally?

14 A Right.

15 Q Okay. On December 26th, you text him and say: I'm at Julie Fancelli's.  
16 Guess what the budget is she just give us for our bus project, the Million MAGA March.  
17 \$3 million.

18 A Right.

19 Q So all I'm trying to say is, at this point on December 26th, it is \$3 million for a  
20 rally on January 6th. You understand that, right?

21 A The number that she told me in our meeting that she wanted to spend on  
22 the rally was \$3 million.

23 Q Okay.

24 A On January 26th --

25 Q Okay. And --

1 Mr. Rowley. December 26th?

2 The Witness. I'm sorry. Yeah.

3 BY [REDACTED]:

4 Q And can you turn back to exhibit 52? On December 26th -- and forgive the  
5 time thing. We can't always control it. It looks like your texts with Budowich on the  
6 26th are around 11:25 a.m.

7 A Okay.

8 Q This one appears to be around 1:09 p.m.?

9 A Okay.

10 Q But Budowich texts Pierson and says: Call me. Have big money for the  
11 rally on the 6th.

12 Mr. Rowley. Where are you in the document?

13 [REDACTED]. Oh, I'm sorry. This is --

14 Mr. Rowley. On the first page.

15 [REDACTED]. Yeah. On the first page. And apologies it is tiny; I couldn't make it  
16 any bigger.

17 BY [REDACTED]:

18 Q Did you have any idea that Budowich was in communication with Ms.  
19 Pierson at that time?

20 A I do not recall. If you had -- if you had asked me, would Taylor talk to  
21 Katrina about it and I hadn't seen this, I probably would have guessed it would have been  
22 sometime around, like, the 27th or 28th. But this isn't that surprising. Katrina and  
23 Taylor are very close. Like, and Taylor very well could have told me: Oh, I talked to  
24 Katrina.

25 I don't have any memory of it.

1 Q Okay. And, if you go back up, on December 22nd, when Budowich asked  
2 Katrina Pierson who is doing the Jan 6th rally, I don't know if you can see, but do you see  
3 what she responds on the 22nd at 5:38 p.m.?

4 A It looks like a tweet.

5 Q And can you tell who it is from?

6 A Kylie -- or Amy Kremer.

7 Q How can you -- oh, the Amy. Your eyes are much better. I was like, how  
8 can you tell which Kremer?

9 A Right.

10 Q It says her name. Good catch.

11 And so, at least here, it seems that -- I'm not asking you to say what somebody  
12 else is thinking, but from here, it looks like at least somebody knows that the Kremers are  
13 associated with the rally on January 6th as of December 22nd?

14 A Right.

15 Q So, just going back for a second, if you could turn on exhibit 53, if you flip to  
16 the second page. So this is Saturday, December 26, at 4:39 p.m.

17 A Okay.

18 Q And Taylor says: Spoke with Justin, he's putting together a production  
19 budget. He's already talking to Kylie and some other chick. I also sent you a budget for  
20 TPX crowd building.

21 So let's take this a little bit at a time. Who is Justin?

22 A Justin Caporale.

23 Q And who is --

24 A Justin Caporale.

25 Q And who is he with?



1 A Event Strategies.

2 Q He's putting together a production budget. What did you understand that  
3 to mean?

4 A A budget for the production of the rally.

5 Q Okay. And had you worked with Justin before?

6 A Yes.

7 Q In what context?

8 A He was the director of operations for the Trump campaign.

9 Q Okay. So, for the uninformed, does that mean he put on a bunch of events  
10 for the Trump campaign?

11 A Yep.

12 Q Okay. And do you have any idea at this point whether Justin had been  
13 contacted, other than by Mr. Budowich?

14 A You'd have to go -- I don't have -- like my text with Justin on the 26th, too, I  
15 think I text him that day saying: Do you know who is doing the January 6th rally?

16 And -- if someone knows where it is, I don't remember his response. But it was  
17 probably -- I think he said he didn't know and would try to find out, and then said it is  
18 Women for America First. So I would imagine that these timing overlap that he called to  
19 find out and then was probably, like, contracted to do the event during that process.

20 Q Okay. And if I could get you to turn to -- just flip, I know they are real small,  
21 but, on the bottom, there's the Bates numbers?

22 A Okay.

23 Q If you could go to the Bates number that says 746.

24 A Are we still on exhibit 53?

25 Q Same exhibit, yeah.

1 A Okay.

2 Q There is a text where Mr. Budowich -- you, I think, believe, in blue, say:  
3 You will just need to send it -- actually, let me back up for a second. He says: I would  
4 really like to get paid ASAP on my December 31st invoice, by the way. Avoid paying  
5 California State income tax for 2021, if possible.

6 And you state: Wait, what invoice? I'm confused.

7 And he says: LOL, for the me and Katrina stuff. There isn't actually an invoice.  
8 I just woke up realizing taxes are really going to suck this year, and I should try to put as  
9 much and possible in 2020.

10 Do you know what he's talking about when he says "for the me and Katrina stuff"?

11 A Yes. I think there was never an expectation that Taylor wouldn't be paid  
12 for his work on this event. And so that's what he was talking about. And his  
13 preference was to be paid by someone prior to the end of the year, due to taxes.

14 Q And who did you understand would be paying for Taylor?

15 A Women for America First.

16 Q Okay. And then in the next text -- well, let me back up for a second.

17 A Yep.

18 Q Why did you think Women for America First --

19 A Yeah.

20 Q -- what gave you the impression that Women for America First would be  
21 paying him?

22 A I think -- I probably would have talked to the Kremers and said: You know,  
23 would you be able to pay Taylor by the way?

24 Q And would that have been like directly to him, through his entity?

25 A I don't know what his entity was, I -- but I would imagine he would have had

1 an LLC or something.

2 Q And, in the next text, where you say -- well, excuse me. You say: You'll  
3 just need to send it to Women for America First.

4 And he says: Is that who is paying, not -- I'm saying TP USA.

5 A Right.

6 Q Is Turning Point USA?

7 A Right.

8 Q And then he says: Katrina doesn't want them to know she's getting paid, so  
9 running it through me.

10 A Right.

11 Q Do you know who the "them" is there?

12 A Women for America First.

13 Q And do you have any idea what he meant by that?

14 A Probably, this is speculation, so -- but -- that I think Katrina had a preexisting  
15 relationship with Women for America First, and she maybe would have felt bad about  
16 them, you know, asking them to pay her for help in something like that, especially since I  
17 was the one who asked Katrina to be involved and help, not necessarily Women for  
18 America First. And so I think -- and Taylor was already involved. So the idea behind  
19 this is, like, subcontracting, which is a normal thing that people do. It would have been  
20 whatever the negotiated amount was for them to be paid by; then Taylor would  
21 subcontract to Katrina to help with the event execution.

22 Q And is that understanding that -- did you have any part in that process of  
23 what Ms. Pierson would be paid, if at all?

24 A I sent Justin a text message saying: I literally just called Katrina and begged  
25 her, like, I will pay you 25k, I don't even care, to come help me deal with these people.

1 So I think the number I had thrown out was 25,000, but I don't actually know if Taylor or  
2 Katrina were ever paid. I never saw any invoices of that amount. And I don't, like,  
3 remember ever following up with anyone.

4 Q So is it fair to say that, if they got paid, it was not by you or through you?

5 A Correct.

6 Q Okay. And, sitting here today, do you in fact know if either of them were  
7 paid for their work?

8 A I don't know.

9 Q Okay.

10 [REDACTED]. Did you have a question?

11 BY [REDACTED]:

12 Q Can you just backtrack just a little bit. Earlier, you were describing how Ms.  
13 Fancelli brought you in to get buses for the event it seems. Is that correct? Is that a  
14 fair characterization, when she brought you in on the 22nd or 23rd?

15 A She didn't bring me in. Like, we had a phone conversation, and we talked  
16 often during that time.

17 Q Okay.

18 A I think the context of that call would have been me talking to her about  
19 giving to Save the U.S. Senate PAC or coming to the Turning Point events or just general  
20 things. And then that's where she brought up a Million MAGA March or a January 6th  
21 event and said: What would it cost to help people get there?

22 And I so I don't know if she asked me to make a memo. I'm a big memo maker.  
23 So I put together a proposed budget of, like: Here would be some options if you wanted  
24 to proceed with that project that we just discussed.

25 Q I guess I'm trying to understand, when did it go from the memo and the

1 project to you -- it seems like you're planning now, what you just described when you  
2 brought in Ms. Pierson. So when did you go from buses to now planning the event?

3 A At the meeting on the 26th with Julie.

4 Q At the meeting on the 26th.

5 A Right.

6 Q And it was you who wanted to bring in his Pierson. Is that correct?

7 A Yes.

8 Q Why did you want to bring in Ms. Pierson?

9 A Because the first couple days of becoming involved in this were confusing for  
10 me because these were all, you know, players, organizations that I was not familiar with.  
11 And I don't rely do grassroots things. And Katrina had been the coalitions rep on the  
12 campaign, and I knew that, like, she would be more familiar with these people and these  
13 groups. And so I thought that she would be a good person to ask to come help kind of  
14 mediate the different situations that were going on.

15 Q And when you say "different situations," what different situations were  
16 going on on December 26th or 27th?

17 A The immediate -- on the 26th, was finding out like who, what this event was  
18 and who was organizing it. And so, when I left the meeting -- like, during it, I texted a  
19 couple of people saying, do you know -- and I think -- so I don't know what time I left the  
20 meeting, but also doing some research, I found that there were a number websites that  
21 were promoting, like, an event on January 6th and speakers. And it seemed that there  
22 was the Women for America First was one group. And then there was the "stop the  
23 steal" coalition and website as another group. And then the third part of this was that  
24 Ms. Fancelli had reached out to Alex Jones, who, at some point, then, someone in his  
25 office had called back and recommended that she talk to woman Cindy Chafian, so

1 throughout this 24 hours, it's a little confusing, but like I connected with Cindy and then  
2 the Kremers and I think Ali was later.

3 Q Okay. And so, when you say that Ms. Pierson could help you manage these  
4 people, you're referring to Women for America First, Ms. Chafian, and then,  
5 subsequently, "stop the steal" and Mr. Alexander, Mr. Jones as well, are the kind of  
6 entities you're referencing?

7 A Yeah. And there were even more people in that -- too. Like, all these  
8 people they were promoting on their websites, it's like I didn't know who the majority of  
9 these people were. The idea would be for her to help that, like an understanding of  
10 who --

11 Q And you identify these people through your own research, similar to the FEC  
12 list? You did your own research, or did someone direct you to these different entities?

13 Mr. Parrish. Objection to form. Which people?

14 [REDACTED]. The ones you just referenced in your previous answer, how did  
15 you identify these entities or individuals.

16 Mr. Parrish. Objection, form.

17 BY [REDACTED]:

18 Q So, okay, "stop the steal," Ms. Chafian, Women for America First, Mr. Jones.  
19 And you said there were others. How did you identify those people?

20 A I'll start with Mr. Jones. During our meeting, Julie asked her assistant to try  
21 to -- I said to her: I don't know who's organizing this event. I will look into it.

22 She said: Alex will know.

23 I did not get the sense that she'd ever spoken to Alex Jones before. What I  
24 gathered was that her assistant called, you know, an Infowars hotline or something, and  
25 someone then called back and said Cindy Chafian is the person to talk to about that.

1           So then -- so that's the Jones part.

2           Ali Alexander and "stop the steal," I was familiar with Ali on Twitter. During this  
3 time, he had been tweeting about events and things. And so, I didn't know how to get  
4 in touch with him. So it was later on I asked someone if they had Ali's phone number.  
5 They said yes. And I called Ali, sometime maybe on the 29th or 30th. I'm not sure of  
6 the date.

7           Women for America First, it may have just been independent research that I did,  
8 or I could have spoken to Taylor about it out. We could have found it out, or it could  
9 have been Justin Caporale replying. But I didn't have contact information so that's  
10 where you saw the email on their website where I emailed their info account and said:  
11 Could someone please contact me? I have someone interested in contributing to the  
12 efforts here.

13           And then, with Cindy Chafian, I was then -- I -- we'd have to look at the -- either,  
14 like, she texted me or Alex sent me her number. I don't remember the exact -- but  
15 that -- that connection came from that call to Alex Jones' office, and they said connect  
16 with Cindy Chafian.

17           ██████████. And I don't want to cut you off. There is, like, a lot in there. I think  
18 we can summarize kind of like two or three -- there was like a lot. So I just want to kind  
19 of unpack that and try to be cognizant of how much you had in there.

20           BY ██████████:

21           Q     Can I ask you to turn to exhibit 4 really quickly because I just have a question  
22 regarding, on December 26th, you talked to Ms. Fancelli. You've talked to  
23 Mr. Budowich. And, in response, he provides you with this \$500,000 budget. This is  
24 for Turning Point, I believe?

25           A     No.

1 Q Who was this for?

2 A This was.

3 Q I apologize. Tea Party Express.

4 A Yeah. And that -- when I was making that memo, that you remember, the  
5 followup memo from the meeting that went to Julie, I believe that 500,000 was the  
6 number that I recommended to, like, on the line item of Tea Party Express. So, as I was  
7 looking do that, I said I wanted to know: With a budget of 500,000, like, what would  
8 you be able to accomplish?

9 And then that's where I was trying to put together a budget that was based off of  
10 the conversations and the meetings. So this was him sending to me: With a \$500,000  
11 budget, this is what we would be able to do.

12 Q Got it. So he produced this in response to your ask, "What could you do for  
13 \$500,000"?

14 A Yes.

15 Q Got it. Okay.

16 And then, earlier, we were looking at exhibit 53. I don't want to go back, but it  
17 was basically the text that was you and Mr. Budowich spoke with Justin. He's putting  
18 together a production budget.

19 A Right.

20 Q Already been talking to Kylie. So, at that point, you're all trying to find out,  
21 like, who is involved and who is planning this.

22 A Right.

23 Q Do you have any reason to believe that, prior to December 26th, Justin  
24 Caporale was involved in any of this?

25 A No, because he didn't -- even know who was org -- his text back to me was:



1 I don't know. Let me find out.

2 Q Okay. And you also said a couple of minutes ago that, while you were with  
3 Ms. Fancelli, I think you blasted off some texts saying: Do you know who's doing the  
4 Jan. 6th rally?

5 A Right.

6 Q Did you produce those to us?

7 A Yeah.

8 Q You did? Who are the people that you remember?

9 A Justin.

10 Q Justin?

11 A Yep. And then Charlie Kirk.

12 Q Okay. And are those the only two people that you reached out -- that you  
13 remember reaching out to?

14 A Yes.

15 Q Okay. And then let's go back, a minute ago, you said that the way  
16 that -- and I don't want to put words in your mouth, so correct me if this is wrong -- the  
17 way that you remember getting involved with Alex Jones is that, when Fan -- actually, you  
18 tell me, how did you get involved with Alex Jones? Let's just specifically say, how did  
19 you come to be involved with Mr. Alex Jones in relation to the rally on the Ellipse on the  
20 6th?

21 A To the best of my recollection, I had a three-way call with Julie and Alex as a  
22 result of that outreach that she had done. What I don't remember -- and it may be  
23 reflected in the text -- is if, like, Alex and Julie spoke on the phone first, and then she  
24 called me and said: I talked to Alex. Can we all get on a three-way call or something?

25 But I -- but I remember my first conversation with Alex was, like, in a three-way

1 call with us together.

2 Q And do you have any idea when that would have been?

3 A The 26th or the 28th -- 7 -- can we go to Julie?

4 Q Julie's texts are exhibit 70, if that helps.

1

2 [12:00 p.m.]

3 Mr. Parrish. When you get to a convenient breaking point --4 [REDACTED]. Yeah, we were just talking literally about that. You read our mind,  
5 Bill.6 The Witness. Yeah, it's not clear in here and I don't know. I thought it was the  
7 27th, but a text that stood out to me was this "guess I'm acting like Alex" on the 26th.

8 [REDACTED]. Where are you looking?

9 The Witness. With Julie.

10 [REDACTED]. What's the Bates?

11 Mr. Kanters. 415.

12 BY [REDACTED]

13 Q Yeah. "Can you two call now or should I try him? Guess I'm acting like  
14 Alex." Okay.15 A So I thought the first time we spoke was the 27th, but then I read this. I'm  
16 like, oh, well, maybe that means -- it seems to me like she's kind of joking about  
17 something about a three-way call and "guess I'm acting like Alex." And so I don't know,  
18 it made me kind of think maybe it was the 26th and that's some reference to, like, her not  
19 knowing how to three-way call.20 Q Okay. But so you would say that on or close to December 26th you  
21 remember having a three-way call between you, Ms. Fancelli, and Alex Jones?22 A Yeah, because they're not -- you know, my text with Alex December 27th at  
23 1:55 p.m., I sent him my contact information and he sends me Cindy's. So that I feel like  
24 we would have talked and he said, send me your contact information.

25 So that's where I -- I don't know what she's talking about, like "guess I'm acting

1 like Alex." So I think it would have been around 1:55 on the 27th. But, luckily, AT&T is  
2 giving you all my calls and you can find that out yourselves.

3 [REDACTED]. Before we get into the Ms. Chafian thing, I think we should all take a  
4 comfort break, because I didn't realize the time. And we have powered through a little  
5 too long for some people.

6 So, without any objection, we will pause and go off the record at noon. And can  
7 we come back at 12:10? Is that all right? Okay. Great.

8 [Recess.]

9 [REDACTED]. Okay. So we're going back on the record at 12:16.

10 BY [REDACTED]:

11 Q And, [REDACTED], thank you.

12 We had left off, just to clarify, we had just talked about how you came to know  
13 Mr. Jones. And I believe you said you had this three-way call, and then you texted and  
14 he put you in touch with somebody named Cindy Chafian?

15 A That's right.

16 Q Did you know Cindy Chafian prior to that?

17 A I did not.

18 Q Okay. And when did you first get involved with her regarding the Ellipse  
19 rally on January 6th?

20 A When I spoke to her on the 27th, I guess.

21 Q Yeah. I think if you look at exhibit 64, these are the texts that you  
22 provided, I believe. It says Cindy.

23 A Yeah.

24 Q And I think it says Cindy Chafian here. This is Sunday, December 27th, at  
25 3:18 p.m.

1 A Yes.

2 Q Is this the first time that you've talked with Ms. Chafian?

3 A Well, this, I haven't talked to her, so --

4 Q I'm sorry, I meant by the text.

5 A Oh, yes. Yes.

6 Q Is this the first contact?

7 A Yes. This would -- yes. I'm sure we would have just spoken on the phone  
8 shortly after that.

9 Q Okay. And she says on December 27th at 4:44 p.m., "Just spoke with  
10 Justin. He's going to manage the whole buildout. He'll get his" -- I skipped -- "He'll get  
11 his quote to me tomorrow."

12 Do you know who she's referring to there?

13 A Justin Caporale.

14 Q Okay. And is it your understanding she's still referring to the event on the  
15 Ellipse on January 6th?

16 A No. At this time, there was not an Ellipse event.

17 Q Oh, excuse me, apologies.

18 A Yes.

19 Q A rally on the 6th. Apologies. We were clarifying it earlier and now I've  
20 got in this horrible habit.

21 The event on the 6th.

22 A Yes.

23 Q Okay.

24 A She was the permit holder for the Freedom Plaza on January 6th.

25 Q Okay. And then a couple hours later she says, "hi, Caroline, I just got a

1 message from Kristin. I'm actually working with her already."

2 And you then ask the question that I have, which is, "Who is Kristin?"

3 A That's Kristin Davis, I believe.

4 Q And who is Kristin Davis?

5 A She's someone who works in some capacity with like Roger Stone. And the  
6 way she presented herself to me is she manages several clients, and it was a little unclear  
7 as to like who those people were. But my conversation with her mainly seemed to be  
8 around Roger Stone.

9 Q So it's your understanding she's somebody associated with Roger Stone?

10 A Yes. But when I first heard of her, it was more that she -- like -- almost like  
11 a -- I don't know. Like if you think of athletes, like a sports manager, like the same but  
12 with -- like, I think she worked with like one of the pastors or something. Like, she said  
13 that a few of these people were her clients, regarding speakers or something.

14 Q But is she like a talent manager or something?

15 A Yes.

16 Q Okay.

17 A Something like that.

18 Q And if you could turn to exhibit 7, can you take a look at this email and tell  
19 me what this is?

20 A So this -- this is on the 28th, to me. So when I talked to her on the 27th,  
21 this is where it was to be -- she told me that -- on the 27th, I spoke to both her and Kylie  
22 Kremer, right back to back.

23 And when I first spoke to Cindy, I thought she worked for Women for America  
24 First. And she almost kind of portrayed herself in that way in that initial conversation  
25 and that she had run the past events. But it was -- it was a little all over the place. It

1 was very confusing. Because then I got an email like to call Kylie Kremer, who I spoke to.

2 I don't remember which told me. That's where I found out like they were suing  
3 each other and there was some sort of issue and that she had some group called like the  
4 80-something Percent Coalition and that Women for America First was something else.

5 But what was of interest to me is that she was the permit holder for Freedom  
6 Plaza, which is where the expectation was at this time where that event was. And the  
7 Kremers were portraying it as they were suing her over this permit.

8 And so now we're into the 28th and kind of skipping over that to -- she  
9 had -- through like a Rally to Revival, and I think I had laid this out for you to the best of  
10 my ability in this.

11 Q The schedule, yeah.

12 A There was a Rally to Revival, and she had something that was like Rally to  
13 Save -- she had a couple different names of things. And she sent this to me because she  
14 had some sort of contract with Alex regarding these events, so this was her forwarding it  
15 to me, and a PAC that I don't like really know what it -- what it was.

16 Q And is it fair to say that one of the reasons that you were working with her  
17 was Ms. Fancelli was very interested in having Alex Jones speak on the 6th?

18 A No. At this time, Ms. Fancelli wanted to donate to support the efforts.  
19 And I was attempting to find out who she would donate to, because like -- so who was in  
20 charge of this event, right? Because Alex Jones told me it was Cindy Chafian and the 80  
21 Percent Coalition. Then Women for America First was who someone else had told me.

22 And so she wanted to donate to put on a rally, which -- to pay for staging, audios,  
23 attempting to figure out what organization would she donate to.

24 Q Oh, no, that part I understood. But for some reason I thought -- and I may  
25 be conflating some things -- but I thought when you were talking about comments that

1 Ms. Fancelli made to you maybe on the 26th and then your three-way call with Alex  
2 Jones, I thought she was a very big fan of Alex Jones and that part of what she wanted for  
3 the rally on the 6th was for Alex Jones to speak and participate.

4 Did I misunderstand that?

5 Mr. Parrish. Objection, compound question.

6 The Witness. I'll break it up. She was a fan of Alex Jones. I said that. And  
7 then -- but the second part of your question, it was already assumed that Alex was  
8 speaking, right? He was on his radio show talking about an event that he was speaking  
9 at in D.C. on the 6th.

10 BY [REDACTED]:

11 Q Okay.

12 A And was probably promoted on certain websites. There were a number of  
13 websites. So it wasn't I want to donate so that Alex Jones speaks at an event on the 6th.  
14 Like, that part was assumed.

15 Q So -- that's really helpful. So, in looking at this contract on December 28th,  
16 you were still trying to figure out who was planning this.

17 A Right.

18 Q She has the permit for Freedom Plaza, where it's supposedly supposed to be  
19 held as of then.

20 A Right.

21 Q And she's working with Alex Jones, who is scheduled to speak at it.

22 Mr. Parrish. Can you identify the "she," because you were talking about Ms.  
23 Fancelli --

24 [REDACTED]. I'm sorry. Cindy Chafian. I apologize.

25 The Witness. So you'll have to repeat it.



1 [REDACTED]. Yeah. Sorry.

2 The Witness. I want to be clear. It's really confusing going into like the 27th.  
3 The 26th, 27th, and 28th are three very confusing days. Like, I -- and also, I was having,  
4 as you can probably tell, different conversations that I was allowing different sort of  
5 information to people.

6 So I think, you know, when we moved to the Ellipse, Cindy may have known that  
7 later and she's still operating under certain assumptions.

8 So now if you can go ahead and ask your question again, I'll --

9 [REDACTED]. Yeah. So on December 28th, when she sends this --

10 The Witness. Right.

11 Mr. Parrish. "She" being?

12 [REDACTED]. Chafian.

13 BY [REDACTED]:

14 Q Ms. Chafian has the permit for Freedom Plaza.

15 A Right.

16 Q Ms. Chafian is working with Alex Jones. And it's assumed that he is  
17 speaking at the event on January 6th that is being held at Freedom Plaza as of this date?

18 A Yes, with the caveat of as of this date here like we had already moved to the  
19 White House Ellipse. I don't know if she knew that. That would probably be in the  
20 text.

21 So I think I'm comfortable answering your question as, yes, on the 26th and early  
22 into the 27th, but then like at 8:07 p.m. on the 28th, I don't know that to be the case.

23 Q So I think what you're kind of alluding to is the permit issues that start to  
24 pop up on the 28th. So we'll come back to that. So let's leave that for now.

25 Can you tell us, if you look at exhibit 5, I think earlier you said you were trying to

1 figure out who was planning the rally. And I want to say earlier you said that the first  
2 exposure you had to Women for America First was you like reached out to a website.

3 A Well, exposure, it's like the -- Justin, I think, texted me on the 26th saying  
4 Women for America First is the planner. Like, this is the first time I remember reaching  
5 out by email. I think there was an Instagram message that I sent to Amy Kremer, or like  
6 Twitter message or something like that. I don't know the timing of that versus this.

7 Q Do you happen to know if you produced the Instagram or Twitter message  
8 where you reached out to one of the Kremers? I only ask because I don't remember  
9 having Instagram or Twitter production.

10 Mr. Rowley. I don't think so.

11 The Witness. Well, then we would have missed that.

12 Mr. Rowley. I don't think so.

13 BY [REDACTED]:

14 Q Okay. If it would be possible to follow up on that later, that would be  
15 great.

16 A It was something along the lines of, "Hi, I" -- well, I think. I have to -- I can  
17 look at it on the break.

18 Q That's fine.

19 A But this was like -- she responded fairly quickly in this.

20 Q Five minutes.

21 A Yeah. But if someone had mentioned them before earlier, something like  
22 that, I don't -- when you say exposure, I just don't know my first exposure to them.

23 Q Well, no. So here's why I asked. On December 27th at 11:20 a.m., when  
24 you send this email, you're not addressing it to anyone. You're just kind -- it looks like  
25 you're sending a general email --

1 A Right.

2 Q -- to info@trumpmarch?

3 A Yes.

4 Q And was that to find out who was on the other side of info@trumpmarch?

5 A No. I think I knew the Kremers -- I didn't have contact information for the  
6 Kremers. So like I think also, like I looked on Twitter to see them, but like didn't have a  
7 phone number or something like that. But then on their website, there was an info.

8 Q Got you. So this was like the fastest way to get ahold of somebody  
9 contact-wise, call me at --

10 A Right. I don't think I knew who Kylie Kremer was, but I knew who Amy  
11 Kremer was.

12 Q Got you. And I think you said you had a call with Kylie that day, the same  
13 day as Cindy. What did you discuss with Kylie?

14 A I don't know how to -- like, to go through like the -- I had a lot of calls with  
15 these people during this window. But the first call with her was sort of very much in the  
16 weeds of don't trust Cindy, you know, we're suing her. We will end up with the permits  
17 and we're in charge of this event.

18 Q Okay. So let me --

19 Mr. Parrish. Ms. Wren, make sure you clarify who was making that comment.

20 The Witness. Kylie Kremer is who I like spoke to representing Women for  
21 America First.

22 BY [REDACTED]:

23 Q And so let me unpack that a little bit.

24 You've already had the call with Cindy Chafian, correct?

25 A I think Cindy was first.

1 Q Okay.

2 A But I could be wrong.

3 Q That's fair.

4 A I'm not sure.

5 Q But on the call with Kylie, during that call she tells you that there's these  
6 issues with this woman Cindy. And can you just kind of like, to the best that you can,  
7 summarize that call, understanding to the best of your recollection?

8 A They -- both of my initial calls with them laid out in great detail their issues  
9 with one another. Kylie's issues with Cindy seemed to be something to do with her like  
10 stealing her mom's organization or some sort of list to form her own competing  
11 organization.

12 Cindy's take seemed to be that she -- like, she kind of wanted back in with Women  
13 for America First, and this kind of like -- having this permit was a -- she almost seemed  
14 more to me of like, "You need to go back to Kylie and tell her that she should call me,"  
15 whereas Kylie was more in the terms of, "We're suing her." And I was just confused.

16 Q And so after these two calls, which is it fair to say they inspired doubt in  
17 terms of like the -- I don't want to put words in your mouth.

18 What was your impression in terms of the organization after speaking with these  
19 two women?

20 A That neither of these organizations should receive \$3 million without any  
21 oversight, would probably --

22 Q I'm very glad I didn't put words into your mouth, but that would have been  
23 close. So I wasn't too far off.

24 Okay. So we can come back to -- and actually, that kind of leads into my next  
25 question, is who is Katrina Pierson?

1           A    Yes. Katrina worked on the campaign. She was in a senior capacity.  
2 She'd been involved for a very long time. And she did coalitions. So I always  
3 understood coalitions, that means a number -- you know, Women for Trump, Latinos for  
4 Trump. She did grassroots. And this was very much not my space.

5           And so I don't remember when it was. Maybe like the 20 -- it was a few days  
6 after. Like, I was trying to navigate this. And then I don't remember if like Taylor had  
7 recommended I call her or I may have just done it myself.

8           And I think I just called her initially for advice: Can you explain to me who these  
9 parties are and people that I'm dealing with? And then it turned into -- and Katrina was  
10 very nice, like: I'm here to help you in any way.

11           And then I do remember at some point I said, like, "I'm not asking you to help for  
12 free." Like, "You should be paid if you're going to come in and help me do all this."  
13 But there wasn't -- I don't remember like any more specifics about payments or  
14 something.

15           Q    Do you happen to remember like whether you called Ms. Pierson first or you  
16 texted her when you reached out?

17           A    Do you know where the texts are with her?

18           Q    That's what I was looking for. Fifty-seven, actually.

19           A    So it looks on my text --

20           Mr. Rowley. Fifty-seven.

21           The Witness. Yeah.

22           So it was somewhere in this period. I'm wondering if I called her and she said,  
23 "call you right back," and then she did, and that's when I spoke to her for the first time  
24 about this event. Or also, it could have been like the 29th or something and then I was  
25 calling her on the 30th to ask a question. She said, "I'll call you right back." But it was

1       sometime right around here.

2                       BY ██████:

3               Q     The reason I ask is because, as you noted earlier, a lot is happening on these  
4       days.   And I was curious, December 30th for Ms. Pierson to get involved seemed like a  
5       lot had happened up to that point.   And so I was curious if you had phone conversations  
6       prior to that.

7               A     One of the texts I sent, I think it was to Justin or it could have been to Taylor,  
8       was like, "I just called Katrina and told her like 'I will literally pay you 25,000 to come in  
9       and just help me.'"

10              Q     You think you sent that in a text?

11              A     Yeah.   So that -- I think that would have been the most able to pinpoint the  
12       day that I would have called.

13              Q     The text where you said you just called Katrina and offered to pay her  
14       \$25,000 to help?

15              ██████.   Micah, if you can find that one, that would be amazing.

16              Let's come back to that, because I don't want to slow us down, but that's like a  
17       location issue.

18                       BY ██████:

19              Q     How long have you known Ms. Pierson?

20              A     I don't know.   She was on the campaign.   So I don't know when I would  
21       have met her directly.   Maybe like in 2019.

22              And I didn't really like truly get to know her, and we were never like that close, but  
23       until when I went in-house with the Trump campaign and was working out of the office  
24       and she was there like --

25              Q     So you connected with her during the campaign in 2020?

1 A Yes.

2 Q Okay. Would you have said you became close friends then?

3 A I would never label Katrina and I as close friends. And we didn't really -- we  
4 didn't overlap too much in work either. But I always found her to be very professional,  
5 and she was very helpful when I would need advice on things. So, I mean, there were  
6 thousands of employees on the campaign so --

7 Q So it's fair to say like really you just knew of her, her reputation, and that she  
8 could probably handle this grassroots thing?

9 A Yeah. Well, I mean, she ran Women for Trump, so I assumed she knew the  
10 Women for America First, because they were Trump, like, women, Trump people so --

11 Q They were like grassroots people that she should know, based on --

12 A Yeah. All these people. Right.

13 Q Got it. Okay.

14 [REDACTED]. Any luck, Micah?

15 Mr. Kanters. Yes. I just need to find the Bates number, but I have located it.

16 [REDACTED]. Actually, even if you just know who the text was with.

17 Mr. Kanters. Oh, sure. It is with Justin Caporale, Wednesday, December 30th.

18 [REDACTED]. Oh, is this -- is this in the ones that you produced last night?

19 Mr. Kanters. It should be. It is --

20 [REDACTED]. I bet it is. Yeah. This may be in exhibit E.

21 Mr. Kanters. The Bates number is 648.

22 [REDACTED]. It's 648?

23 Mr. Kanters. Yes. It's at the bottom of 648 and continues onto 649.

24 [REDACTED]. We may have to take a break and then find this bad boy. We may  
25 have to pull that one. Actually, it may be -- hold on just one second.

1           Actually, right now may be a good time to take a break and we can hunt down  
2           that text and just break for lunch, if that's all right. It's 12:34, so it's a good time to take  
3           a break.

4           We will find that. I know we have it if it's at 634. It's just somehow --

5           The Witness. Oh, yeah. So it was December 30th at 3:30. So it was actually  
6           around that same time, but --

7           ██████████. And actually, Micah, can you just read it off just so I know what you're  
8           talking about?

9           Mr. Kanters. Sure. Certainly. Her text is, "No, I was just calling to vent  
10          because both Cindy and Kylie are insane. But I just spoke to Katrina and said, 'Look, I  
11          will literally pay you \$25,000 to be the go-between for this catfight and to ensure neither  
12          kill each other and is dealing with the Kremers on the permit thing now.'"

13          ██████████. And that was December 30th at what time?

14          Mr. Kanters. 3:33 is the date at the highest text in that thread.

15          ██████████. And just give me the Bates number one more time.

16          Mr. Kanters. Certainly. It is the bottom of 648 continuing to the top of 649.

17          ██████████. And is it REV or REVU?

18          Mr. Kanters. REVU. The supplemental, yes.

19          ██████████. Awesome.

20          All right. So why don't we break for lunch. It's 12:35.

21          [Recess.]



1

2 [1:42 p.m.]

3 [REDACTED]. We are back on the record at 1:42. And I just want to note for the  
4 record that Senior Counsel [REDACTED] is present with us at this point in the interview.

5 BY [REDACTED]:

6 Q So right before we left for the break, Micah was kind enough to run down  
7 one of the texts that I think you had referenced at 648, I believe. And I think we had  
8 asked you if this was when you reached out to Katrina Pierson, and you read it out. It  
9 was the, "No, I was just calling to vent," I think it was to Justin Caporale. And I think we  
10 said this was on December 30th.

11 A Uh-huh.

12 Q This was the first time that you reached out to her personally, you think?

13 A Yes.

14 Q Okay. But you don't know whether that was -- do you know whether she  
15 was already involved in planning events on the 6th before that?

16 A I don't know.

17 Q Okay. And on December 27th, former President Trump tweets: "See you  
18 in Washington, D.C., on January 6th. Don't miss it. Information to follow."

19 At this point, do you know who is talking with the White House regarding the  
20 planning of the events on the 6th?

21 A I don't, but I would just point out that the President had tweeted about this  
22 event like a number of times even like as early as December 18th.

23 Q Right.

24 A Right. So details to follow, I just don't know if it was like a stringing along  
25 of that or someone was talking to someone in the White House, saying, like, now we're

1 going to have details or something.

2 Q Do you know if anyone was actually coordinating with the White House in  
3 terms of the rally on the Ellipse at this point in time?

4 A Yes, because Justin met like with Secret Service to just have the event.  
5 Secret Service said no to the Freedom Plaza, and it was moved to the Ellipse. So I  
6 considered like Secret Service being an extension of the White House. Like, that's why  
7 that change happened.

8 Q Okay. And so in terms of between the 26th and the 28th, the change from  
9 moving to Freedom Plaza to the Ellipse, your understanding is that's because Justin does a  
10 walk-through to the Service and they say no to the Freedom Plaza.

11 A Correct.

12 Q Okay. And when you're having conversations with the organizers -- and by  
13 organizers, I'm just collectively referring to Women for America First and Chafian and  
14 some of the folks we've talked about -- are you representing to any of them that you are  
15 having communications with the White House?

16 A I don't remember, but I would doubt it.

17 Q Are you intentionally or unintentionally giving them the impression that you  
18 are still talking to Trump or people in the Trump world?

19 Mr. Parrish. Objection, calls for speculation as to what their impression was.

20 [REDACTED]. No, no, I'm asking you, like, are you giving them the impression?

21 Mr. Parrish. You're asking if she's trying to give them the impression?

22 [REDACTED]. No. I'm saying are you making statements with regards to your  
23 connections to the Trumps or your connections with Ms. Guilfoyle, are you giving people  
24 the impression that you are actively having conversations either with the White House or  
25 with family members of the former President?

1 Mr. Parrish. Objection, form.

2 The Witness. I don't --

3 BY [REDACTED]:

4 Q Is it unclear or should I like --

5 A I don't remember every single conversation, and I can't interpret what they  
6 would have thought as to those impressions. But --

7 Q No, let me rephrase it then.

8 Are you telling any of them, "Well, I'm talking to the White House. Well, I'm  
9 talking to Kimberly. Well, I'm talking to Don." Are you representing to any of them  
10 that you are having conversations with the White House or with Trump family members?

11 A Specific to the White House, I don't think I would have ever said, "I'm asking  
12 the White House, I'll get back to you," because I never spoke with the White House.

13 Now, I did say numerous times the White House will make the final decision on,  
14 let's say, speakers or things. So if that was then interpreted that I'm speaking to the  
15 White House, like, that's up to whoever the interpreter is. But I wouldn't have said,  
16 "Hang on, I'm calling the White House."

17 Q Okay. And do you -- any other questions on that?

18 [REDACTED]. No.

19 [REDACTED]. At some point there were a number of rallies that were kind of  
20 popping up in relation to January 6th. You kind of provided like charts of like when they  
21 were changing.

22 Can you tell us when your involvement starts with Ali Alexander or how you come  
23 to meet him or know him? I'll say know him, because I know it was probably not in  
24 person.

25 The Witness. Do you know where those texts are?

1           ██████████. The Ali Alexander texts?

2           The Witness. Uh-huh.

3           ██████████. Micah is going to find it before me.

4           Mr. Kanters. So 498 is about midway through.

5           ██████████. 62? Yes, 62.

6           The Witness. Okay. December 29th at 10:26 a.m.

7           BY ██████████:

8           Q     And so, just to be clear that these texts are the first communications, there's  
9     no phone calls or you didn't know him prior to this?

10          A     No. I think I mentioned in my -- the informal interview -- that I think I  
11     maybe could have met him in 2008, when I was a college student, at CPAC. Like, he was  
12     coming around. And then never again until December 29th at 10:26 a.m. So --

13          Q     And also, you raised a good point. There may be some questions that we  
14     talked with you about that we just have to reiterate for the deposition. So if that's the  
15     case, it's not intentionally repetitive. It's just the nature of this.

16          A     Yeah.

17          Q     Okay. So this is -- and how do you become -- like, does somebody connect  
18     you or -- because you reach out to him.

19          A     Correct.

20          Q     So why are you reaching out to him?

21          A     Because he had on Twitter like had a very big presence about this. And so  
22     I'd been following his tweets at that time. And he clearly -- it was like kind of Stop the  
23     Steal Coalition and the past events and things. And so it seemed that he was an event  
24     organizer of some kind.

25          Q     And I think -- you have these in front of you. I don't. So correct me if I'm

1 wrong. But on some of the schedules that you gave, like this is what was happening at  
2 the time, when you connect with him on December 29th, you have him on there as a Stop  
3 the Steal rally organizer, I believe.

4 A Right.

5 Q So are you aware of the existence of the Stop the Steal event that's planned  
6 at the Capitol on January 6th?

7 A I don't know when I came to be aware of that. It could have been that  
8 early, but he had said that he had a permit at the Capitol to like -- to do a rally on January  
9 6th. And then it was part of the planning discussions in that when I was trying to figure  
10 out who had permits, I just remember him talking about how at his location you could  
11 only have a three-inch stage and like a speaker box, like minimal audio.

12 So it was -- and early on is when it became, you know, kind of apparent that it was  
13 likely the President would speak. So it was never going to be an option that it be there,  
14 because you couldn't have like an actual staging or anything. And that is information I  
15 received from Ali, obviously, about like the permit doesn't allow for that there.

16 Q When you say that's information you received -- and maybe I'm just not  
17 remembering -- was that something that you would have talked with him on the phone  
18 about --

19 A Yes.

20 Q -- as opposed to texting?

21 A Yes, yes.

22 Q And did he mention anything to you about his permit?

23 A Yes, that he had a permit at the Capitol, and that --

24 Q Did -- I'm sorry.

25 A And that like that's where the stage and like audio thing came up.

1 Q Did he happen to mention to you who the holder of the permit was or  
2 whose name the permit was under?

3 A He never did, huh-uh.

4 Q Okay. Did he ever mention to you concerns in terms of whether anybody  
5 would find out that he was, in fact, the permit holder?

6 A No.

7 Q Were you familiar with previous Stop the Steal rallies that Mr. Alexander had  
8 done in other locations?

9 Mr. Parrish. Objection, form. By "familiar with," just aware that they had  
10 happened? Or what are you asking?

11 [REDACTED]. Sure.

12 BY [REDACTED]:

13 Q Yeah, were you aware that they had happened?

14 A I don't think I was aware of the first one. I do remember like some image  
15 of the President going in an SUV like around Freedom Plaza and waving to people and  
16 some sort of rally happening. I don't know which of those two events that was. And I  
17 don't think I like looked much into it or knew who was organizing what.

18 Q At any point in time did you become aware that he had participated or  
19 organized in other events at capitals around the country?

20 A I am aware of him doing a protest or something in Georgia. What I don't  
21 know is if I learned that like after January 6th, the news reports, or if I was aware of it at  
22 that time. I don't have any recollection.

23 Q Well, let me ask you this. At any point in time during the planning of this  
24 do you remember being concerned about the nature of his previous rallies?

25 A No.

1 Q Okay. And what was your understanding of that group and their event, in  
2 terms of what Ali and Stop the Steal was doing -- or what they were planning in terms of  
3 their event at the Capitol?

4 Mr. Rowley. As of what time, [REDACTED]?

5 The Witness. Yeah.

6 BY [REDACTED]:

7 Q Actually, start from like when you first met him and then if it changed.

8 A I met him originally about when I knew he was doing an event at the Capitol.  
9 Like, it may have been from the first time I spoke to him on the phone, where we talked  
10 about like the logistics of his stage and things.

11 And then it was kind of just assumed throughout that time -- I remember talking  
12 to him like several times about timing or things. So I always knew that he was having  
13 some sort of event at the Capitol.

14 Q Okay. And was it your understanding that his event would be completely  
15 separate and he would only speak there, or was he planning to be a part of the event that  
16 you and others were organizing on the 6th?

17 A No. It was my understanding that he was going -- that starting from the  
18 27th -- let's say the 27th, because that's when I think I spoke to Kylie and Cindy and  
19 others -- that it was like this joint event, that the different groups came together and  
20 there was a stage and they all broke up times and a bunch of different organizers were all  
21 a part of it.

22 So to me at that time, my interest was who was like a permit holder. But it was  
23 my understanding there were conversations with those two from the beginning that like  
24 Ali was a significant puzzle piece to this because he had been involved in the past ones  
25 and he had a -- he had a like highly publicized website that had speakers already listed on

1 it.

2 Q I'm sorry. A second ago you said he and the other person. Who was  
3 the -- you said that "they."

4 A "They" would have been Cindy or like Kylie Kremer.

5 Q Okay. And who provided you with Ali's contact information?

6 A Jack Posobiec.

7 Q And so how did you -- if you said this already, I apologize -- but who is it that  
8 tells you, "Contact this guy"?

9 A No one asked me to like contact this guy. By the 27th, I was talking with  
10 both of those two. And Cindy and Kylie both had their own opinions on Ali. Like, he  
11 was always going to be in the mix.

12 Q Okay.

13 A And then separate from that, Justin and I were having conversations. Kind  
14 of I would talk to one of these and he would, and then we'd both try to understand what  
15 that conversation meant and then talk to one another.

16 And so we had been talking at some point we need to fold in Ali Alexander into  
17 this, mainly because he was -- he had a website, one, that would need to have correct  
18 information, and then was promoting things on Twitter. And so the hope was to have  
19 everyone kind of on the same page promoting the same guidance.

20 Q Okay. And do you remember -- did he ever ask you who you worked for?

21 A I don't -- I don't think so. I think he probably would have known like I was a  
22 Trump campaign fundraiser and that. I have seen -- and so where you may be  
23 going -- like that in some videos or things they put out that I just talked to the White  
24 House. I don't know if they have a separate White House contact or they were, like,  
25 they were implying that I was the White House. But I never would have said -- like, I



1 didn't work in the White House. So I didn't work for the White House, so I don't --

2 Q So you think there's a possibility that when he said he was talking to the  
3 White House, he may have actually been talking about you?

4 A Yes.

5 Q Okay. And I thought you were going somewhere else, but if you can look  
6 at -- we've marked it exhibit 80. I don't know if it's in your binders, but it's the one that  
7 you produced late last night?

8 A Okay.

9 Q It's, I think -- actually, I'm not sure who it's with. It's -- can you read that  
10 Bates numbers?

11 Mr. Rowley. Is that the Marianne text?

12 [REDACTED]. No, it's the Ali Alexander and somebody named Tom. 947, I want to  
13 say?

14 The Witness. Yeah, here it is.

15 BY [REDACTED]:

16 Q And I don't know if you can tell this, because you may have a lot of Toms in  
17 your phone, but do you know who this is?

18 A Tom Van Flein.

19 Q Okay. And who is that?

20 A The chief of staff for Paul Gosar.

21 Q Okay. And Mr. Alexander says, "Thomas, will you call Caroline with the  
22 Trump campaign?"

23 So is it -- I mean, did you tell him that you were with the Trump campaign?

24 A Yeah. If I would have explained my background, I would have said I'm with  
25 the Trump campaign. What I would imagine that happens is like that internally is how

1 he would have referenced me, but externally I think that some of these folks like to say  
2 that they were in communication with the White House, right? And so he may have  
3 been saying that to others, but like he knew I was not a White House official, clearly from  
4 here.

5 Q Are there problems for you if he represents to people that you're still with  
6 the Trump campaign as of January 5th?

7 A No. I mean, I wasn't going to like go on the record and correct him and be  
8 like, "Oh, the Trump campaign is over. I'm now Caroline Wren with Bluebonnet." I  
9 mean, it's a text.

10 Q No, that would have been an awkward text. But just out of curiosity, did  
11 you ever have a talk with him and say, "Hey, I'm not with the Trump campaign anymore"?  
12 Like, did you ever say anything to him about that not being true?

13 A I don't recall like having a conversation one way or the other with him about  
14 that.

15 Q Prior to January 6th, did you ever get the impression from him that he  
16 believed that you were either still with the Trump campaign or actively talking to the  
17 White House?

18 A No. I never would have represented and said that I'm actively talking to  
19 the White House, like. And with the Trump campaign, I feel like I would have talked and  
20 he would have known that like the Trump campaign was over, like it ended on November  
21 5th, so -- 4th, I guess.

22 Q Is it your understanding that the Trump fundraising -- because I thought  
23 earlier you had said after the election there was like Trump Victory or Team Magic or  
24 there's something, right, that's --

25 A Trump Victory was -- that was the joint fundraising committee between the

1 RNC and the Trump campaign. But like my last day with the Trump campaign was  
2 November 4th. My last payment by the Trump campaign was November like 15th or  
3 something, because we were paid on two-week blocks, and so it went there.

4 And then somewhere in that like middle part like our emails -- people were  
5 staggered off of the Trump campaign. And I was in an early wave, because there was no  
6 fundraising efforts. Like, we weren't soliciting funds.

7 Q But you were done, but things were still going on that somebody could think  
8 there were still people working for the Trump campaign?

9 Mr. Parrish. Objection, form.

10 BY [REDACTED]:

11 Q Do you understand?

12 A Like, if they had a press conference, like, and Rudy is talking, I don't know if  
13 Rudy was working for the Trump campaign or in the capacity of the personal lawyer or  
14 what, but --

15 Q Right. But I guess what I'm saying is it was possible -- there were -- there  
16 was still something that people could believe the Trump campaign was. Like, it was still  
17 going. You may not have been working for it --

18 A Right.

19 Q -- but somebody might not have been able to know that if they didn't know  
20 what your exact end date was, right?

21 Mr. Parrish. Objection, form.

22 The Witness. I don't know what Ali knew or when, but I wouldn't at that time  
23 have represented myself and said, "I'm like working on the Trump campaign right now  
24 and doing this."

25 BY [REDACTED]:

1 Q And I get that. My question was actually, did you ever get the impression  
2 from him, either from things he said or did or represented to others, that he did think  
3 that you were talking to the White House or that you were still Trump campaign?

4 A I think if he -- like oftentimes I talked with Ali, and he would say, you know, "I  
5 want this person to speak." I'd say, "That's going to be determined by the White  
6 House," and then would relay that back up to other like chains or something and come  
7 back to him. So I --

8 Q Did he ever ask you to talk to people at the White House or make requests  
9 to say, "well, can you ask them or can you" -- like, did he give you the impression -- let me  
10 rephrase that.

11 Did he give you the impression by asking you for things that he wanted you to be  
12 in contact with the White House?

13 A I don't recall any specific request that he would have asked me to then ask  
14 the White House.

15 Q Did he ever make any requests for you to talk to Kimberly Guilfoyle or Don,  
16 Jr. on his behalf?

17 A No.

18 Q Or with an idea or some concept for the rally?

19 A Never.

20 Q Okay. Did you have any conversations with him regarding his permitting  
21 process?

22 A No. I think from when I met him or got involved that I -- that like he had a  
23 permit. And if you consider process, what I mentioned about like the staging type of  
24 things, that stuff.

25 Q Did he ever mention to you how many people he anticipated being at his

1 rally?

2 A No. We talked about the RSVPs on his website.

3 Q Which -- do you remember how many?

4 A I think like the last time I saw, it was around 50,000. For some reason, at  
5 one point I thought 80,000 is what he had said, but it was something in like in writing of  
6 what I found it was 50,000.

7 Q Do you have any idea like whether progressively over time -- did he happen  
8 to give you any updates? Like, was that all of a sudden there were 50,000 registrants, or  
9 was it over time from the time that he posted it to the date of the 6th?

10 A He did not give -- I don't remember him like giving me updates, right?  
11 There was also multiple websites, so that was a little confusing.

12 But he did say something about how at like a past event on his website he had  
13 2,500 RSVPs and this one he had 50,000. And so like that showing there's a significant  
14 jump in numbers.

15 Q Was there ever a time that you thought 50 people would be present at his  
16 rally?

17 A I never thought about his rally, really. So the website was promoting -- why  
18 it was asking for RSVPs was because we're going to ask him to send our guidance memo  
19 for the event at the White House Ellipse.

20 Q Let me rephrase my question. Based on all the conversations that you had  
21 with him about what he was planning --

22 A Right.

23 Q -- would you have thought an estimation of 50 people attending his rally was  
24 a realistic number?

25 A I didn't know of an estimation of like people attending his rally.

1 Q Oh, no, no, I'm not asking that.

2 A Right.

3 Q I'm saying, if somebody had said Ali and his coordinators are estimating that  
4 50 people will attend, does that match in any way the representations that he made to  
5 you in terms of how many people he was actually trying to get to come to his rally?

6 A He was trying to get people to come to the White House Ellipse. So I  
7 don't --

8 Q At any point was he trying to get them to come to the -- I think you said it  
9 was the pallet with the box at the Capitol?

10 A Yes, that. Yeah, I think it was kind of -- I just never had conversations about  
11 him about like driving attendance towards his or anything. All of our conversations  
12 were limited to the Ellipse, and then some led over to the 5th, like the Freedom Plaza  
13 event on the 5th. But like we really had limited conversations about his event at the  
14 Capitol other than there was the timing change.

15 Q Well, was any part of that because, from what I saw on some of your stuff,  
16 there was a progression?

17 A Right.

18 Q It was supposed to be the rally at the Ellipse and then people would  
19 go -- they would march to his event at the Capitol?

20 Mr. Parrish. Objection, form. Can you specify what time you're asking about  
21 now?

1

2

BY [REDACTED]:

3

4

5

Q Well, wasn't that -- wasn't that always -- it was a march from the beginning, it was a Million MAGA March, a March to Save America -- I think "march" has been in nearly every title I've seen.

6

A Yes.

7

Q And his event was always I believe on Lot 8 at the Capitol.

8

A Right.

9

10

Q So wasn't everything always envisioned that wherever it was, Freedom Plaza or at the Ellipse, they would march to Lot 8 at the Capitol where he was having his rally?

11

12

13

A Well, before I go into that, I want to back up and answer that I think I -- there is -- on that day, it was my understanding he had a permit like all day. He mentioned to me about that.

14

15

16

And so there was a conversation I had with him probably sometime around the 4th or the 5th about how he was going to have multiple Members of Congress come outside and do like a press conference type of deal at the Capitol at his permitted spot.

17

18

19

20

So if that's maybe what you're talking about 50, maybe that's like members of the press, but it was meant to be he had these different Members that were going to come out and then they were going to -- then some of the Members were potentially going to come over to our event, or Ali was going to come over to our event.

21

22

23

24

And I flagged for him -- he was telling me it was something around 10 a.m. And I said, that's never going to -- you're going to have to be at the Ellipse at 6 a.m. And also, if Members of Congress are intending to come to the Capitol to our event, there's going to be so much shut down, like there's not really even a way to do that.

25

So there's no way you're -- basically like there's no way that you're going to be

1 able to have a press conference with Members of Congress at 10 a.m. and also participate  
2 in the event at the White House Ellipse.

3 Q Okay. And in terms of other groups that were planning events, have you  
4 ever heard of Moms for America?

5 A Yes, but only recently.

6 Q Not at the time, at the election to January 6th?

7 A I don't think I had ever heard of them. I wouldn't have known really who  
8 Kimberly Fletcher was. But their name -- I do remember seeing them as a -- like on one  
9 of the sponsor groups or things. But I never interacted with her, to my -- I don't know if  
10 I ever texted her or something. But I met her I thought for the first time like maybe a  
11 week or so ago. So --

12 Q I think in one of the documents that you provided there was -- it was a setup  
13 guide from Event Strategies on December 28th that they sent to you and Women for  
14 America First that showed like an audio package and lighting for POTUS. Did you have  
15 any role in helping ESI put that together?

16 A No.

17 Q Okay. Do you know who did put that together?

18 A Well, they did this for like every event for the President. So I'm sure it's  
19 probably pretty standard.

20 Q So if they said "for POTUS," is it your understanding that they would have  
21 actually coordinated with somebody at the White House or they just had his preferences  
22 on file kind of thing?

23 A No, they would work with White House advance.

24 Q And what do you mean when you say "White House advance?" Explain  
25 that to me.



1           A    The advance office is the one that executes the events from the White  
2   House side.  And there's the advance on the campaign, let's say, which Justin and Megan  
3   were the operations team.  And then those two would frequently coordinate with each  
4   other on executing events.

5           Q    So walk me through like who are the people that you are talking about?  
6   Justin is one.  Caporale is one.

7           A    Yes.

8           Q    Megan Mulvaney?

9           A    No, Megan Powers.

10          Q    Powers, I apologize.  That's another one.  Who else is on what you're  
11   calling the White House advance team?

12          A    There's not White House staff.  This was -- those were examples of two  
13   people that were on the campaign operations who the whole time I knew them would  
14   deal with White House advance.

15          Q    Okay.

16          A    Now, like fast forward to January 6th.  It's my understanding Megan was  
17   contracted through Event -- similar to how I hired Maggie and Kira that day to help me  
18   execute.  I believe that Event Strategies hired Hannah and Megan to assist with the  
19   execution of this event.  But that is the group that would have been communicating with  
20   White House advance.

21          Q    And who -- do you know who was on White House advance?

22          A    It's a big department, but Bobby Peede is the head of White House advance  
23   and Max Miller kind of floated between advance.  I think towards the end he was like in  
24   some sort of different role, but did stuff with advance.

25                And that's probably who they --

1 Q Did you ever have any conversations with anyone planning the rally on  
2 January 6th with anybody that you considered the White House advance team?

3 A The only -- I think on the 5th we were doing a walk-through late at night, and  
4 I think Bobby Peede was out there like with us in a group setting, and I like said hello and  
5 gave him a hug or things. But otherwise, not by phone or text message. And again,  
6 any questions I would have had in that capacity would have just -- I would have asked  
7 Justin.

8 Q Okay. Because your understanding was going to Justin was effectively  
9 going to White House advance?

10 Mr. Parrish. Objection, form.

11 The Witness. No. It would be -- that's just sort of a -- like, if it was something in  
12 relation to the President's movements or security or like audio or lighting, which I  
13 wouldn't have -- then that is like going through Justin, as the event contractor and  
14 organizer, and then they would ask that of White House advance.

15 Like, I would never call Bobby Peede with a question. I didn't have Bobby  
16 Peede's number. That's not how like a flow of information would go.

17           . Okay, that makes sense.

18 On December 29th -- or I should say by December 29th -- Women for America  
19 First I think had submitted an application for the January 6th event on the Ellipse. And I  
20 should say permit. I don't think application is exactly accurate.

21 The Witness. Right.

22           . Do you know how that came about?

23 The Witness. Do you have my messages with Kylie Kremer?

1 [2:11 p.m.]

2 BY [REDACTED]:

3 Q I think it's all in the group chat. Are you thinking of an individual one with  
4 her?

5 A Yeah. Like our individual chain.

6 Q Unfortunately, I don't know that that one is an exhibit.

7 A Okay. Okay. On December 28th, I texted Kylie and said: Please submit  
8 the permit for the Ellipse on the 4th, 5th, 6th, and 7th for build down strike. Thank you.

9 And I don't really know -- it would have been Justin and I were talking at that time.  
10 And so like right around that text message, probably right prior to it, Justin texted me and  
11 said: Please ask Kylie to submit a permit.

12 It's kind of interesting because Justin had been contracted for one. So I don't  
13 know why he asked me to ask her versus just them talking to each other, but -- but at that  
14 time Justin had done the walk-through with Secret Service and probably White House  
15 Advance, and they had determined that the Freedom Plaza would not be an option and  
16 picked the White House Ellipse.

17 And then Justin and I had conversations about, okay, like what do we do about  
18 this permit situation because, at the time, you know, you had Cindy holding the permit  
19 for Freedom Plaza; you had the Kremers threatening to sue; you had Ali, who we had not  
20 made contact with yet. And so I don't know who made the final call that it should be in  
21 Women for America First name for the permit, but Justin said: Tell the Kremers to file  
22 for a permit, and then, after that, we'll deal with these other people.

23 Q Were you on any of the calls with the National Park Service regarding the  
24 permit?

25 A Nope.

1 Q Okay. Can you turn to exhibit 12 for me, and it's like on the -- I don't know  
2 that there's a -- unfortunately, there's not a Bates number on the bottom, but I want to  
3 say it's the second cards page.

4 A This is per Caroline's Wren's instructions.

5 Q Yeah.

6 A I was just flipping through this binder, and I noticed that. I've never seen  
7 this document until earlier when I came in and was flipping through it. So I don't know  
8 who any of these people are. Like, I kind of read through it and -- yeah. This is -- are  
9 you just asking me about --

10 Q I was asking -- Cindy Chafian tells NPS that the reason she's -- she's been told  
11 that the Kremers are supposed to relinquish the permit so she can plan an event there on  
12 the 5th, and this is per Caroline Wren's instructions. I was curious, did you, in fact,  
13 instruct her that?

14 A No.

15 Q Okay.

16 BY [REDACTED]:

17 Q Do you know why they released the permit to allow Cindy to do the event on  
18 the 5th?

19 A Yeah. There's some long dialogue and the text that we can go through,  
20 yeah.

21 Q In a nutshell because of all the drama, it was giving her an ability to have a  
22 platform on the 5th, Cindy and her speakers?

23 A Sorry. What are you asking?

24 Q What do you understand about why they released it to Cindy to have the  
25 event on the night of the 5th?

1           A    Actually, I don't -- they didn't release it to Cindy.  The 5th -- the permit was  
2   put in pastor -- Peaceably Gather Pastor Brian Gibson.

3           Q    That's what you understand?

4           A    Yes.

5           Q    All right.

6           A    It was like an MOU, and that was the agreement of everyone.

7           Q    All right.  Whatever the case, but the date matters and is helpful because,  
8   on the 28th, you told the Kremers to apply for the Ellipse permit, right?  December  
9   28th?

10          A    Yes.  And I told Cindy shortly thereafter that like, if it was no longer being at  
11   the Ellipse.  She was very upset obviously that it was going to go into the Kremers'  
12   name.  And then -- but I learned this throughout this process that you don't, like, apply  
13   for permit a single day.  You have, like, multiple days.  It has to do with buildouts or  
14   things.  So then when it was moved, the permit fight between the Kremers and Cindy  
15   was kind of irrelevant, in my mind, because we moved to the Ellipse.  But then when  
16   there was this compromise, okay, we add an event on the 5th, well, that permit was still  
17   in Cindy's name technically on those dates, so I actually don't really understand this email  
18   because it relinquished the permit so that I can have it on the 5th.

19                Like, I thought the permit was in Cindy's name for the 5th, 6th, and 7th.

20          Q    But what was the compromise that you're referring to that had to be struck?

21          A    I would have to find those texts.  So that was -- okay.  Here it is.

22                ██████████.  I think it's actually in your presentation that you gave to us.

23                The Witness.  Yeah.  There's just these like texts that kind of -- well, so the  
24   compromise was, when the event was moved to the Ellipse and then the timing was  
25   picked to be, you know, midday, 11 or 12, and you started backing up those timings and

1 people usually have to arrive -- like 5 or 6 hours you open the doors, and it compressed  
2 the time that would be available for speakers.

3           And there was, I would argue, hundreds of people thinking they were coming to  
4 Washington, D.C., to speak. They were tweeting out graphics. They were on a number  
5 of websites, and so -- I said, you know, we -- we're going to have to deal with the fact that  
6 all these people are not going to actually be speaking, some of these groups. And so  
7 what if, you know, there's an event added on the evening of the 5th and that could do  
8 overflow of speakers. And then the morning of the 6th, like, whoever speaks that day  
9 will be determined by the White House because they'd be sharing the stage with the  
10 President.

11           So then when -- when -- when that was decided, then it became a question of  
12 permitting, to some extent, and this is where I kind of had to deal with Kylie and her  
13 personality. And, in dealing with them, it was -- we would all come to an agreement,  
14 say, by phone. And then it would be like several hours later, and I would get a very long  
15 text message from her as to all the reasons why she no longer wanted to do the thing  
16 that we'd agreed to do hours prior.

17           So that was similar into this where I had said: Great. Like, Cindy already has  
18 the permit for the 5th. Let's keep her happy, so just leave it in her name. She does the  
19 5th event. She'd run the stage on the past ones and then you're getting the permit on  
20 the 6th and, like, let's all be happy.

21           And so she sends this long text message here about: Would you be okay with  
22 adding Katrina to the permit on Freedom Plaza. We have all of our vendors ready to go  
23 and execute. We will occupy -- we will accommodate any speaker of any notoriety and  
24 be very gracious considering others the same as we did with Ali on November 14th.

25           We're having a very hard time because Cindy's taking everything she had

1 access -- a lot -- I mean, I just remember reading it and being like: Okay.

2 [REDACTED]. Who is that you're reading?

3 Mr. Rowley. You're referring to a text message?

4 The Witness. Yeah.

5 Mr. Rowley. What's the date of that?

6 The Witness. This was between me, Amy Cramer, Justin, Kylie. There's a fourth  
7 picture on there. There's a few text messages I have with a 770 number, and I don't  
8 know whose number that is.

9 [REDACTED]. Do you know Jennifer Halsey? Does that sound familiar?

10 The Witness. Some of them referenced a Jennifer, and I don't know who she is,  
11 so -- so I don't know. It's a thread.

12 [REDACTED]. And that's good. And I think [REDACTED] will get to the speakers, and  
13 we'll walk you through that, but to your point about the comment from Kylie on Ali and  
14 the November 14th event.

15 The Witness. Yeah. My point was being it changed from the time -- in the first  
16 48 hours of meeting Kylie, she told me that she was suing Cindy Chafian. She said that  
17 she didn't want Ali involved because he always gets all the credit. She said she didn't  
18 want Turning Point USA involved because the grassroots don't like Charlie Kirk. She said  
19 she didn't want the Tea Party Patriots involved because they had stolen her mom's  
20 organization. She said she didn't want Alex Jones involved because he was rude to her  
21 backstage the time before, and I could go -- like, every single person whose name came  
22 up on planet Earth, I had a 20-minute diatribe on to why that person was not an  
23 acceptable human being per Kylie Kremer's judgment. So --

24 [REDACTED]. She wanted a coalition of one?

25 The Witness. Right. Exactly. Feeling bad -- I didn't really care. I don't really

1 care about a fight you had 8 years ago, right? Like, this woman is a Tea Party Patriot and  
2 wants to come to a free rally with other patriots of the Tea Party movement, then okay.

3 Like, I don't -- so this is a good example of it because, at one point, you know, she  
4 was Ali is the worst human being, and then, the next hour, it would be Cindy. And so  
5 even here she says: Reminder, Cindy is banned on several social media platforms. She  
6 has no mass communication list, she has no following other than what she is claiming and  
7 using illegally from our organization. I would rather release the permits to Ali Akbar  
8 than to know they will go to Cindy Chafian. That's how strongly we feel about this and  
9 the harm she has caused. I apologize this is so complex. I am horrified we are all in  
10 this situation. We are trying to be as big a tent as possible without harming ourselves,  
11 President Trump, or any of the legitimate work that has been done on behalf of the  
12 America First agenda.

13 Again, I note here that the only thing I knew about the Kremers prior to this is that  
14 the Trump campaign had sued them as a cease and desist to stop using the term "Women  
15 for Trump," and that's why their name changed. So that was the only thing I knew  
16 about them coming into this.

17 Mr. Rowley. Wait for the next question.

18 BY [REDACTED]:

19 Q So it's good segue to you -- you knew, from the first time you talked to Kylie,  
20 she was not a fan of Ali Alexander to put it mildly, right?

21 A She was not a fan of anyone.

22 Q Okay. And so your first text to Ali Alexander is you looked at is in  
23 exhibit 62 --

24 A Right.

25 Q -- is December 29th, the morning. If you want to take a look.



1 A Yes. Yep.

2 Q At that point, the decision has already been made to put the permit in  
3 Women for America First --

4 A Right.

5 Q -- at the Ellipse, right?

6 A Right.

7 Q And you already know that Women for America First doesn't play nicely with  
8 Ali Alexander, right?

9 A Right.

10 Q And so why are you reaching out to him on the morning of December 29th --

11 A Yeah.

12 Q -- about January 6th?

13 A Because, as I mentioned, he had a highly publicized website and was  
14 promoting information. So, like, if we were going to be putting out information that the  
15 event was going to take place at the White House Ellipse, then we needed him putting  
16 out that information as well. We needed his website along with the other websites also  
17 putting the same information.

18 Q So the reason to reach out to him was that so he could promote the event at  
19 the Ellipse?

20 A Yes.

21 Q It wasn't about having him speak at the Ellipse?

22 A At that time, I think that he thought he was speaking. I thought it was  
23 likely that he would end up being a speaker.

24 Q Why did you think that once -- if you knew that Women for America First,  
25 which had the permit, that they did not like Mr. Alexander and didn't want to be involved

1 with him?

2 A Well, because I didn't expect the program to just be Amy Kremer, Kylie  
3 Kremer, and the President of the United States, which were the only three people that  
4 they found acceptable.

5 Q And so you said Jack Posobiec gave you Ali Alexander's phone number?

6 A Correct.

7 Q Did you have to ask him for that?

8 A Yeah, I asked Jack for it.

9 Q Why did you think that Jack would have Ali Alexander's number?

10 A He just -- he's kind of in that grassroots sphere, too, so I figured that he'd  
11 probably have it.

12 Q Do you have communications with Jack about the rally or Alexander? I  
13 don't know that we've seen those.

14           . I don't believe.

15 The Witness. I don't think so. I'll go back and look. It may have been that I  
16 called him on the phone and asked for Ali's number and then like put it into my phone?

17 BY           :

18 Q And, at this point, Caroline, by December 29th, the expectation is the  
19 President is speaking?

20 A Yes.

21 Q And you have the money for the event from Ms. Fancelli?

22 A Right.

23 Q What do you care at that point about who's speaking or not given that the  
24 President is going to be there? Why does it matter to you?

25 A It doesn't matter to me who is speaking. It matters to me that the event is

1 organized and that there is a number of people promoting on various websites and social  
2 media that they are speaking. And so that seemed important and that you had to  
3 coordinate with those different groups and people.

4 Q But, as you said, the White House decides who speaks --

5 A Right.

6 Q -- at a Trump event. Is that right?

7 A Yeah.

8 Q Okay. So what does it matter if other people on social media who are not  
9 the Trumps or the White House are saying they're going to speak at the event?

10 Mr. Parrish. Objection, form.

11                     . Did you understand what I was asking?

12 Mr. Parrish. What does it matter to who?

13                     . Well, she just said to her.

14 BY                     :

15 Q So I'm asking, what does it matter to you whether people are promoting  
16 who are not the President, not the White House that they're going to speak at the event?

17 A Well, there were multiple events. So, if they were speaking on the 5th or  
18 the 6th, but -- so I would rather just hone it in on who it is that we're talking about  
19 specifically. It is easier for me to answer.

20 Q Ali Alexander?

21 A So, for me, I felt that just because the Kremers did not -- the only thing the  
22 Kremers or Kylie brought to my attention is that she didn't want Ali Alexander to get all of  
23 the credit, which he always did, even though her and her mom did all the work.

24 So she did not ever -- I want to be very clear about this: She did not flag for me  
25 security concerns or that he might bring, you know, danger or violence. It was that he

1 would get all of the credit. So I didn't find that a credible reason to ban someone from  
2 participating in events, especially when they were clearly an organizer and this was a free  
3 rally. There's no reason to not include anyone.

4 Q But why include him? Besides the Kremers not wanting him there, why did  
5 you reach out to include him?

6 A Because he was kind of the -- as I mentioned, he was the -- this is a good way  
7 to put it. His website at the end had 50,000-plus RSVPs. The Kremers had somewhere  
8 around 20,000, and that was after the President of the United States had tweeted it  
9 multiple times, the Kremers had promoted it, they had less than half the number of RSVPs  
10 that Ali Alexander did.

11 It never made sense to me to ignore a person or a website that -- like, we needed  
12 him to send out the guest guidance memo that instructed people to please arrive at a  
13 certain time, here's the gate entry, here are the prohibited items per Secret Service.

14 Q In other words, he brings the people better than Women for America First  
15 and would help build the crowd for the event at the Ellipse?

16 A No, I don't think it's one brings people better than the other. I just -- it  
17 doesn't make -- it didn't make sense to ignore one group. I didn't -- he had more RSVPs,  
18 so, yes, I'm not saying one's better than the other; I'm just saying you can't ignore a  
19 website with 50,000 RSVPs.

20 Q Did anybody suggest to you to reach out to Ali Alexander to get him to help  
21 build the crowd for the event at the Ellipse?

22 A No.

23 Q It was your own idea?

24 A I want to split up the question. Like, nobody recommended that I reach  
25 out to Ali. And, separate from that, I never reached out to Ali to ask him to help -- like,

1 build a crowd. Ali had a website already going and was promoting things and promoting  
2 buses and people to attend and all these -- like, he was an event organizer.

3 Q All right. So your own idea to reach out, it wasn't Jack Posobiec; it was  
4 your idea?

5 A Yeah.

6 Q And it was to help drive people to the town and build a crowd?

7 Mr. Parrish. Objection, form.

8 The Witness. Yeah.

9 Mr. Parrish. She just told you he already had people; he was already doing it  
10 before she ever heard of him.

11 The Witness. Right.

12 BY [REDACTED]:

13 Q So could we maybe go to the text with Ali Alexander? They start in  
14 exhibit 62, and as you stated earlier, they start on December 29th. And then just kind  
15 of, like, maybe peruse for a couple of days the discussions about the websites, the  
16 cybersecurity for the site, multiple website options.

17 I think on -- let's see -- I'm at the bottom of 494, you ask him also, what do you  
18 think of making a TV ad hitting Thune blanketing SD airways to put notice on other  
19 Senators as well. I think that's not even related to the 6th. That's just advice on  
20 something. He says I was thinking of logos at the bottom. I think he's responding to  
21 like a website thing.

22 A Oh, yeah.

23 Q And then you're talking about a name -- this is a lot. I mean to your point  
24 of --

25 A Yep.

1 Mr. Rowley. So, [REDACTED], she can take a minute and look through those?

2 [REDACTED]. Yeah. That might be a good thing. I mean, this is a while ago, but  
3 to kind of, like, refresh the tone and tenor of the relationship kind of thing I hope.

4 Mr. Rowley. Is there something specific you want to ask her about so she can be  
5 looking for it?

6 [REDACTED]. No. Sorry. I choked. I think it just might be helpful as [REDACTED]  
7 asking the question in terms of its been a while, like, to kind of look back.

8 Mr. Rowley. Okay. Take a minute and look through those.

9 You good?

10 The Witness. Yep.

11 Mr. Rowley. She's reviewed them.

12 BY [REDACTED]:

13 Q Actually, can we go to 509 real quick, Sunday, January 3rd. It says: Can  
14 you please get a Trump tweet? It'll make everyone feel easy.

15 A Yep.

16 Q So, at least, he thought that you had the ability to get President Trump to  
17 tweet something?

18 A Right.

19 Q Okay. And did you tell him that, no, I don't have that ability; I'm not  
20 communicating with the White House?

21 A No.

22 [REDACTED]. Earlier you said that you thought that Mr. Alexander's event was a  
23 piece of the puzzle for January 6th?

24 The Witness. Right.

25 [REDACTED]. What piece of the puzzle was Mr. Alexander's event in your mind?

1           The Witness. My understanding of the past two is like all these coalition groups  
2 came together and would -- this day was not actually -- even, prior to any of our  
3 involvement, this day was still going to be the same, but I could tell, obviously, that  
4 feelings and emotions were high among these groups. Again, the reasoning was dates  
5 back years. Others date back just probably from doing two past events and this being  
6 the third.

7           I didn't really care. So there was never a place where I thought that Ali  
8 Alexander, his coalition -- it wasn't like were going to be involved, and the majority of the  
9 names overlapped. It's like Roger Stone was on Ali's website. He was on Cindy  
10 Chafian's list. He was on the Women for America First website. There are several  
11 names, like, when you talk about a coalition that --

12           BY [REDACTED]:

13           Q So there is -- if we could turn to exhibit 14. So there is quite a lot of talk  
14 and emails about, like, who is going to speak, right? And I think earlier -- in fact, you  
15 had, I think, put this in your presentation during the informal interview, something along  
16 the lines of, like -- I lost the picture already -- but it was something along the lines of like,  
17 oh, this -- oh, it was the picture between the 29th and the 30th, and you said the changes  
18 between the 29th and the 30th, January 5th rally at Freedom Plaza was added and permit  
19 put in Pastor Brian Gibson's name, Peaceably Gathered, to accommodate speakers who  
20 weren't able to speak on the 6th. But, at that point, it's not actually known who is  
21 officially going to speak, right? They just know that there's going to be, like, overflow  
22 and then the people on the 6th. Is that right?

23           A Yeah. That's right.

24           Q Yeah. And so, in terms of, like, how the speakers are getting decided  
25 on -- so if you look at exhibit 14, this is December 31st, an email to Justin Caporale -- well,

1 actually, there's an email at the bottom from you to Justin on New Year's Eve at 11:18  
2 a.m., and then it looks like Justin may have forwarded that to Hannah Salem and Megan  
3 Powers.

4 And, if you flip the page, there's a proposed speaker line up --

5 A Right.

6 Q -- that I think you sent to Justin.

7 A Right.

8 Q Who prepared this?

9 A I did, I think. It looks like it.

10 Q And where would you have gotten the times, the speakers? Like, where  
11 would you have gotten this information?

12 A Cindy Chafian had emailed me an Excel sheet at some point that had a bunch  
13 of names and then she mentioned, like, who she thought was speaking when she thought  
14 the permit was in her event. Then Kylie Kremer had told me the people that she wanted  
15 to speak, like -- at some point, this may actually have come later. Then this woman  
16 Kristin Davis I had had a call with. These were the people that she had said she wanted  
17 to speak. Then -- so what these were and what I -- like, what I do is, put these into an  
18 Excel sheet and see how they make sense in timing. And so these evolved like over  
19 time, but always with the understanding -- there were a couple things: The President  
20 was not confirmed to speak until, really, as late as, like, the 3rd or 4th. So, if he had  
21 never been confirmed to speak, let's say, then this speaker list would have changed. So,  
22 like, what I was doing is keeping things in an Excel sheet, and when he was speaking, then  
23 that was his decision. The others would flow into the 5th.

24 Q So is it fair to say that this was your attempt to amalgamate all of the  
25 different speakers that all the different groups were asking for into one coherent



1 schedule?

2 A Yes.

3 Q Okay. And -- any other questions on that?

4 If you could turn to exhibit 17, this is, I believe, an email from Hannah Salem, and I  
5 think the attachment is attached to the email on December 31st at 2:07 p.m.

6 And she attaches, I believe, on the next page, a different draft speaker lineup.

7 Do you know who prepares this one here?

8 A This one here.

9 Q Yes. Do you know who prepared this?

10 A Me.

11 Q You prepared this?

12 A Yep.

13 Q Okay. So this is, like, 2 or 3 hours -- is this 2 or 3 hours later?

14 A Yeah.

15 Q So where does this speaker lineup come from?

16 A It's a similar one. I was working Excel off of the -- that other -- that was the  
17 last time I saw anything in, like, that format of where you had it vertical at the time.

18 And then, really, where the change happened is you start to only see the 6th. That's  
19 why this is now -- the 5th kind of dropped -- I was like, okay, we don't need to track who's  
20 speaking on the 5th. That's irrelevant. So let's focus on the 6th, then the timing and  
21 how that could work.

22 Because Hannah was also helping with timing and Megan and Justin. So, at this  
23 point in time, an idea was to break it up into segments and then give each of these  
24 segments the opportunity to say, you know, these are the people that I would like to  
25 speak during my segment. And so you pick your top five.

1           And then, ultimately, if the President was going to speak, then the White House  
2 would decide who from the segments this would include --

3           Q    Okay.

4           A    -- and how would that work from a timing standpoint.

5           Q    And so, going back a second, you said January 5th didn't matter anymore.  
6 Was that because somebody else was going to be organizing the speakers on the 5th?

7           A    Or it just sort of dropped off of the part -- from the format of the  
8 spreadsheet.  And it's not that it didn't matter anymore, just -- I didn't have anything to  
9 do nor did, like, Justin or Megan or anything with their speakers' timing or anything like  
10 that.  So there was no reason to track it.

11          Q    So let me ask you -- because it sounded like before what changed was  
12 removing this event to the 5th to take the overflow of people who aren't able to speak on  
13 the 6th?

14          A    Right.

15          Q    So is there not kind of like a balance of, well, we're going to have to figure  
16 out who doesn't make it on the 6th who ends up on the 5th?

17          A    No.  I think that goes too much into decisionmaking.  For me, everything is  
18 formatting.  So I like to see -- so my job, again, was to compile things into an Excel.  If  
19 you notice from that last document we looked at, it was a lateral page, included the 5th  
20 and 6th.  I didn't like that.  I thought it was irrelevant to keep seeing the 5th because  
21 that wasn't an important part.

22                So it now moves into this format here and then probably in these three -- those  
23 3 hours being the difference, I had spoken -- or myself or others had spoke to say, who  
24 would be -- like, for example, this is Ali:  If you had a block of time, one, two, three, who  
25 would be your top five, because there's not going to be time to do this.

1 Gives his top five. There's sort of some overflow there, you know, top four, and  
2 then that's where this evolution came to.

3 Q I see what you're saying. It wasn't so much that you weren't still thinking  
4 about the 5th; it was that you weren't putting it on this spreadsheet, like, it may have  
5 been somewhere else, you just changed the format?

6 A Yeah. If they moved over the 5th, that's fine. But this was just --

7 Q Okay. On December 31st, what communications did you have with Ali  
8 Alexander you just alluded to to actually coordinate speakers?

9 A On Ali's website, he had a bunch of speakers featured. And so, with Ali, the  
10 same as with anyone, it was ultimately the White House will make this decision, but  
11 there's no way -- there's going to be very limited time. So if you had the choice and a  
12 block of five speakers, who would those five people be? And so this was his list of the  
13 five that he would've picked.

14 Q Okay. And can you look at exhibit 20? I think this is the next day.

15 A Yep.

16 Q And this is ROS, run of show, right?

17 A Yes. Yep.

18 Q And so this is an email between all of you in terms of 7 a.m. doors open,  
19 regarding another proposed speakers lineup. Who drafted this one?

20 A Megan Powers, Justin, or Hannah.

21 Q Okay. And are they -- like, where are they -- I'm sorry. Did I cut you off?

22 A No. I didn't realize -- is this the attachment?

23 Q It should be. I believe it goes from 174 -- for some reason it goes from  
24 174 --

25 A Is it back on that sideways format here?

1 Q It is lateral. I think this was one of the ones that you told me the widow  
2 orphans --

3 Mr. Kanters. -- from --

4 [REDACTED]. Yeah, 177 followed 174. So, I mean, my understanding is that the  
5 schedule, the WFAF schedule that's attached to Megan's January 1st email is our REVU  
6 177, the document that we put right behind it.

7 The Witness. It looks like this document matches that one that we were talking  
8 about a little bit earlier.

9 BY [REDACTED]:

10 Q Okay. So you think you made this one?

11 A I made this document, but I almost never send documents as a Word, and I  
12 wouldn't have ever labeled this document. So what I'm saying is the word "document"  
13 that's attached to this email, I don't think is this, unless that was like -- my version was  
14 forwarded to Hannah and then she just saved it in Word or something and renamed it.

15 Q Okay. Micah's probably checking as we speak, so if that is not, in fact, the  
16 attachment, that would be very good to know. But --

17 Mr. Parrish. Ms. Wren, when you refer to "this" document, you need to give it a  
18 number. You need to point out what you're talking about?

19 The Witness. 2020.01.06 underscore WFAF schedule underscore V2.

20 Mr. Kanters. And there's two versions of it, and I'll have the Bates numbers in  
21 just a second.

22 So it starts version one begins at Bates No. REVU 166.

23 [REDACTED]. Okay.

24 The Witness. That's right. That's what I remember.

25 Mr. Kanters. And I apologize if I had that incorrect in the chart.

1 [REDACTED]. No, no. That's okay. Let me make a note. So you're saying the  
2 attachment for this one, the Women for America -- oh, because there's multiple --

3 Mr. Kanters. Two versions.

4 [REDACTED]. -- multiple versions. Okay. So WFAF schedule is which Bates  
5 number?

6 Mr. Kanters. Is 166.

7 [REDACTED]. Okay.

8 Mr. Kanters. And that continues to 168. That's version one.

9 [REDACTED]. And version two?

10 Mr. Kanters. 169 is immediately after it to 170

11 [REDACTED]. Okay. That's super helpful.

12 BY [REDACTED]:

13 Q Just, if you remember, because the time it'll take us to hunt it down, based  
14 on the fact that it says WFAF schedule, do you believe that's one that you would have  
15 prepared or that's one that Women for America prepared?

16 A No, it's one that they have one. I remember the document. So mine was  
17 Excel sheets prepared like conceptually to look at time and also to compile -- these are all  
18 kind of from multiple peoples' input of who they want speaking. Ultimately, someone  
19 else is going to make this decision. What Event Strategies makes is a run of show that's  
20 in the format that's provided to the White House as a final run of show. It's what's given  
21 in a briefing document.

22 So I don't ever see a final run of show because that ends up being a, like, I guess,  
23 privileged document, however, you all would say, but the final run of show is based off of  
24 the President's schedule, and it's an internal, like, White House doc that goes between  
25 their teams. So she went ahead and made that probably preemptively. So we're

1 looking at two totally different things. The Excel sheets we're looking at are peoples'  
2 input and just kind of talking of names and a way to keep tracking what she is doing is  
3 putting in an actual run of show for the President.

4 Q And, when you say "she," who are you talking about?

5 Mr. Parrish. Ms. Wren, can you slow down a little bit?

6 The Witness. Sorry. Yeah. Hannah, I think is who sent that or Megan.

7 BY [REDACTED]:

8 Q So Megan sends the first one, the WFAF schedule No. 1 and then there's a  
9 version 2 that looks like it's edited that she updates. And then, on January 2nd, at  
10 11 a.m., you write back to Megan, Hannah, and Justin and you said: This looks perfect;  
11 however, I'd prefer not to share the document with Kylie and instead just verbally walk  
12 her through it. Sidney -- I think you meant Sidney Powell -- is still TBD. We'll know by  
13 tomorrow. Flynn is confirmed.

14 Why did you want to verbally walk through that with Kylie instead of sending it to  
15 her?

16 A I don't remember why.

17 Q Sitting here today based on comments you've made and thinking back,  
18 understanding that some speculation might be involved, can you think of why you might  
19 not have wanted to send that to her and just verbally walk through it?

20 A I think I would've rather done it verbally because if we did it by print, it  
21 would have been with pages and pages of text messages and thoughts.

22 Q Okay. And did you did you get pushback from anyone -- because I  
23 understand your list had Ali Alexander and Alex Jones on the speaker lineup on Jan 6.  
24 Did you get pushback from anyone about having Ali Alexander and Alex Jones speaking on  
25 January 6th?

1           A    Well, I want to be careful about my list. My list was everyone's list put into  
2 one format like color coded so we can be -- look and say, this is Women for America First  
3 list; this is Ali's list; this is, you know, the other people --

4           Q    I'm just saying yours because I don't have the Women for America First in  
5 front of me. So I'm just saying the ones we've reviewed that we've established you  
6 drafted.

7           A    So the master tracker of speakers and its evolution. The pushback that I  
8 received from Kylie Kremer on -- related to Ali was that she didn't want him speaking  
9 because he always tries to take all the credit.

10          Q    Did anybody else express concerns about having Ali Alexander or Alex Jones  
11 speak on January 6th?

12          A    Katrina.

13          Q    And what were the conversations you had with Katrina about that?

14          A    She -- she just didn't -- I don't remember specifics, but she didn't want those  
15 two to speak. And then she didn't like Scott Presler for some reason. Those are the  
16 only three I remember her feeling strongly one way or the other.

17          Q    Can you turn to exhibit 21?

18                Sorry. Go ahead.

19          [REDACTED] You don't recall why Ms. Pierson opposed Mr. Alexander?

20                The Witness. No.

21                BY [REDACTED]

22          Q    Can you turn to exhibit 21?

23          A    Yep.

24          Q    So exhibit 21, I think you emailed Taylor Budowich: Can we go ahead and  
25 publicize the following speakers on the website. And then take a look at Mr. Budowich's

1 response about an hour later.

2 A I read it.

3 Q Did you discuss that with Mr. Budowich after he sent it?

4 A Yes.

5 Q And did he explain or give further -- what was the discussion that you had  
6 with him?

7 A It's hard to look at any of these documents isolated. If you pull up the text  
8 messages with Taylor at this time while emails are also going on and then calls after, like, I  
9 think -- what I remember is he was frustrated here in relation to something else going on  
10 in text messages. I think that I'd, like, not been answering my phone on the 1st and  
11 then the, like -- I don't remember what. And so then this comes out here where I  
12 think -- then we're fine. Like, we talked on the phone, and then, all of a sudden, we go  
13 back into normal chatter was that the website was supposed to be -- was going to  
14 promote speakers on the 5th and 6th, so this didn't -- this didn't dictate as to which day  
15 people would be speaking, but all of these people were likely to speak on either the 5th  
16 or 6th. So there was no reason, like, just to say, hey, these are speakers.

17 Q He's pretty clear: Ali Akbar and Alex Jones are destructive to what the  
18 President is working toward and terrible for Don and Kim to share a stage with. I don't  
19 want to be involved with that. That doesn't really -- and let me just be clear: Don and  
20 Kim, did you understand that to be Don Jr. and Kimberly Guilfoyle?

21 A Yes. Yes.

22 Q That doesn't really seem unclear? I mean --

23 A Yeah.

24 Q -- reading it, would you disagree if somebody said he had very strong  
25 concerns about Ali Akbar and Alex Jones being on a stage with Don and Kim presumably



1 since they were only speaking on January 6th on January 6th?

2 A Right. Yeah, he is very clear. He did not like Ali or Alex.

3 Q Why?

4 Mr. Rowley. If you know.

5 The Witness. I don't. A lot of people didn't like others in this process.

6 BY [REDACTED]:

7 Q When you talked with him afterwards, did he explain how he felt they were  
8 destructive to what the President is working towards?

9 A No, because -- I don't know what the President was working towards -- when  
10 I talked to him, I don't remember dissecting each line of this.

11 Q Well, when you had the conversation with him, did he say anything about Ali  
12 Akbar and Alex Jones having violent rhetoric?

13 A No.

14 Q He didn't say anything about the tone of what they advocate for being  
15 different than some of the other groups that were going to be present on Jan 6?

16 A No.

17 Q Did you have conversations with Don Jr. and Kimberly Guilfoyle regarding Ali  
18 Alexander and Alex Jones being on stage with them on January 6th?

19 Mr. Parrish. Objection, form. The question implies that they were on stage  
20 together?

21 [REDACTED]. They were on stage together. Don Jr. and Kimberly Guilfoyle were  
22 on the stage together.

23 My question was --

24 Mr. Parrish. No, but you implied that it was with Alex Jones and Ali Akbar in your  
25 question.

1 BY [REDACTED]:

2 Q No, no. I said, did you have any conversations with Don Jr. and Kimberly  
3 Guilfoyle about their presence being on stage or the possibility of being on stage with Ali  
4 Alexander and Alex Jones, either/or Ali Alexander or Alex Jones?

5 A Right. It is highly unlikely I would've had that conversation with Don, but I  
6 don't remember definitively. And with Kim -- with Kim I may have talked to her about it,  
7 but I don't remember any specifics, and I don't remember her feeling strongly. She  
8 wasn't very involved in the weeds of this.

9 Q She wasn't very involved in the weeds of speaking at the event?

10 A No, of like -- at this point -- on January 6th about others speaking, any like  
11 the logistics, anything like that.

12 Q A minute ago you said it was highly unlikely you would've spoken with Don  
13 directly about it. Like, can you explain what you meant by that?

14 A Because I don't, like, talk to Don on the phone and check in with him about  
15 these things.

16 Q Okay. Any questions on that?

17 Can you turn to exhibit -- you have any questions?

18 Can you turn to exhibit 22. I think you had -- you started to allude to this,  
19 but -- so this is January 2nd, same day, few hours after your email with Mr. Budowich.  
20 This is Ms. Pierson emailing you and Mr. Budowich about a new proposed speaker  
21 schedule.

22 A Correct.

23 Q She says the green marks are those who are confirmed on the 5th, and I just  
24 want to touch on that for a moment, if you could turn the page. And I apologize, we  
25 actually had to blow this up because it was really minuscule. So this is a modified

1 version that's just visible. The green marks are those who are already confirmed  
2 speaking on the 5th.

3 Mr. Rowley. [REDACTED], I'm sorry to interrupt. This is not the original document  
4 blown up; it's a recreation of the original document?

5 [REDACTED]. It's the Microsoft Excel that you had super zoomed in.

6 Mr. Rowley. Okay. So it is the same document just zoomed up.

7 [REDACTED]. Well, in order to do it, we actually had to take it and put it in a Word  
8 document because of our terrible printer. So this is the same content; it's just made  
9 into a document that's zoomed out but still legible.

10 Mr. Rowley. Okay. Thank you.

11 [REDACTED]. Excuse me. Zoomed in, but still legible.

12 BY [REDACTED]:

13 Q So, in the green boxes, those are people who are already confirmed on the  
14 5th as of January 2nd. That includes Pastor Mark Burns, Ali Alexander, Police  
15 Commissioner Kerik, and Roger Stone.

16 At the point that Ms. Pierson sends this, were you aware that those individuals  
17 were confirmed as speaking on the 5th?

18 A No. And I didn't understand then and I still don't understand now, like,  
19 what that -- like, who confirmed them for the 5th? Then, was that relayed to those  
20 people or anything? Like, in a vacuum, that doesn't really make sense.

21 Q Let me step back for a second. Who did you think Ms. Pierson got this red,  
22 green, yellow box information from?

23 A It says: Guidance from the White House.

24 But this is a good example. This is why I made it in this format was to be able to  
25 just say, like, we were all talking to different organizers, put it in here, and then

1 go -- Katrina, you get guidance from others.

2 So when -- I don't know who said, like, red or green because she says in here that  
3 she spoke to other organizers, which I would assume to be probably the Kremers, like,  
4 and then the White House, I don't know who she ran it by in the White House.

5 Q So let me -- let me come back to that in a second. On No. 3, she says: The  
6 yellow marks either don't pass vetting or there may be an issue to explore. Do you  
7 know what she meant by "don't pass vetting"?

8 A No. And she says that multiple times. And a vetting report, like, takes a  
9 couple days, and so I don't know where -- and then this is a good example. Like Scott  
10 Presler was the only one she said would come back not vetting. I've never -- he seems  
11 like the nicest kid around who just goes around and registers -- of all the people on this  
12 list to not pass the vetting report, is it really the, like, 18-year-old kid who just registers  
13 voters?

14 Q So do you have any idea what vetting process she was referring to there  
15 when she said that the yellow didn't pass vetting?

16 A No.

17 Q Okay. And so -- in November 4, she says, POTUS' expectations are to have  
18 something intimate at the Ellipse and call on everyone to march to the Capitol. This  
19 actually works out because Ali's group is already setting up at the Capitol and SCOTUS is  
20 on the way. Who did you understand POTUS to be in that?

21 A President of the United States.

22 Q And was it your understanding at the time that you were reading this that  
23 she had gotten that from the President of the United States?

24 A No. It's a guidance from the White House. So it would have been that  
25 she was speaking to someone in the White House who then potentially had been asking

1 the President, but I don't have any knowledge of Katrina speaking with the President any  
2 time other than the January 4th. Doesn't mean she didn't.

3 Q Okay. No, no. I see what you're saying. So, at the top, I was able to get  
4 a little guidance. You understand that to be POTUS, but not necessarily a direct line  
5 from Katrina to POTUS?

6 A Yeah. Guidance from the White House. So whoever it is that she talked  
7 to in the White House, like, potentially could've -- she could've asked questions to, they  
8 asked the President, it was relayed back to her.

9 Q And so after --

10 A What I think is more interesting to point out here is that if everyone  
11 was -- including Katrina -- was so concerned over Ali Alexander and violent rhetoric, why  
12 would she be telling me that it's great that everyone can march to the Capitol and it  
13 works out because then Ali's group will be there and they can all go?

14 So it's a little confusing as to, now, the rhetoric that I'm hearing come out of these  
15 folks now afterwards is that they were concerned that Ali was too high charged. That  
16 was not rhetoric I was getting at the time.

17 Q So, actually, that's a really interesting point. Can you -- can you  
18 explain -- like, I see what you're saying, but kind of like help me understand POTUS'  
19 expectations are to have something intimate and call on everyone to march to the  
20 Capitol, right?

21 So some people would say when they called it a "march," it was clear that they  
22 were marching, but certainly by now, it's clear, right, that everybody's marching to the  
23 Capitol. And you're point is here, she's actually -- she's actually almost endorsing or  
24 saying it's fine because Ali's group is already setting up at the Capitol and SCOTUS is on  
25 the way.

1           A     My point is -- the conversations I had during this time, again, like even with  
2     the Kremers, they're only concern ever raised to me about Ali was that he takes all of the  
3     limelight. It wasn't "we're concerned about violent rhetoric; we're concerned he's an  
4     extremist." That is now what I'm seeing play out a lot in the press, and in accusations  
5     against me in the press are, like, being rewritten from what was happening in real time.

6           Q     So -- because you raise a good point, if she's not worried about Ali's group  
7     setting up at the Capitol and everybody marching over there, what did you think her  
8     worry was about him speaking on the 6th?

9           Mr. Rowley. At the Ellipse?

10          ██████████. Right. Yes. I'm sorry. At the Ellipse rally.

11          The Witness. I don't -- because it was -- she came in and -- like, there was a  
12     bunch of flags here of different people that she had concerns about, but at this point, I  
13     just was happy to have the help, and I didn't really, like, pushback on Katrina who said it  
14     was -- I had asked her to help me kind of better understand who these people were.  
15     Ultimately, at this time, the President was going to decide who was speaking, right?

16                 Like, around the 2nd, it was almost pretty much certain that he was going to  
17     speak. So this still wasn't even any sort of final speaking list, and for me it was guided  
18     from the White House, oh, move this person to the 5th or something, but --

19          BY ██████████:

20          Q     So every list that has POTUS speaking, I think, at 11 a.m. is just post that  
21     tweet where he says it's like -- everybody is just kind of, like, there's a chance -- like, we're  
22     hoping until confirmation, we're just kind of leaving this there for him until we actually  
23     get confirmation is kind of what I was understanding you to say? Because they say  
24     POTUS. They always say -- like, a lot of the lineup --

25          A     Oh, when was he confirmed are you saying?

1 Q No, no. We'll come to that, but I thought what you were saying is that, at  
2 this point, he's not confirmed. Like, if the speaker lineup says POTUS that does not  
3 necessarily mean he's confirmed; it's just a space held for POTUS?

4 A My recollection of a final confirmation, like, he is speaking, this is happening,  
5 was the 3rd, sometime around there. Like, whenever the first time like a graphic went  
6 out with him saying confirmed President Trump. So maybe it could have been the  
7 second or something like that, but we were operating under the assumption it was highly  
8 likely starting -- from the moment we moved it to the Ellipse.

9 Q Okay. And let me check something real quick. So she sends this on the  
10 second --

11 A Right.

12 Q -- and did you understand this to mean that, when she marked the green  
13 boxes as being confirmed on the 5th, did you understand this to mean that they were  
14 being moved to the 5th, and they would not be speaking on the 6th?

15 A Yeah. I understood it as to her recommendation based on guidance that  
16 she had gotten from the White House organizers that, like, these should be moved to the  
17 5th, but I was confused. Well, what's the difference then between someone green and  
18 the 5th of red on the 5th.

19 Q What do you mean?

20 A Like, they were all being moved to the 5th and saying -- all of these were  
21 people who were confirmed to speak on the 6th via some organizer or some website,  
22 right? So I didn't get the sense that she called Ali Alexander and called and confirmed to  
23 let him know that he would actually be speaking on the 5th.

24 And she's saying, if they're in green and highlighted, they're confirmed for the 5th,  
25 I don't get the sense that that was communicated on the 2nd to Roger Stone who's in

1 here in green on the 5th.

2 Q No, no. That seems pretty clear, right, cause you're having texts up until  
3 like January 5th.

4 A Right. So I didn't understand this email then, and I still don't understand it  
5 now.

6 Q Do you remember at the time what your impression was in terms of what  
7 were the ramifications of somebody being green, yellow, or red?

8 A I took it ever to basically mean who, like, Katrina necessarily like liked or  
9 didn't like.

10 Q Katrina or Katrina with White House guidance?

11 A Katrina. I never -- I don't think I ever asked her, but I don't know who her  
12 point of contact was in the White House, so --

13 Q When you saw -- oh, I'm sorry.

14 A The only reason why I think it's her, I just remember being very confused  
15 about, like, her concerns over Scott Presler, and of all the people to flag on vetting on this  
16 list, like, it's just kind of a random one.

17 Q Did you -- in terms of point No. 5, I think, we should secure a SCOTUS stage  
18 and have the higher profile, more serious policy speakers who are not speaking on the  
19 5th speak there right after POTUS on the way to the Capitol. Did it seem like there was  
20 a little bit of a -- for lack of a better word, like, a sorting hatness to this in terms of some  
21 of you are going to the 5th, some of you are going to SCOTUS, and then, I think, only four  
22 make it to -- no, not four -- excuse me -- like a handful of the early ones, the only ones  
23 below blue who make it on to the 6th are Mastriano and Paxton and then all of the  
24 Women for America First speakers?

25 A Make it on to the --



1 Q Like if you work at the --

2 A Oh, the blanket means that they're on the 6th or something?

3 Q My reading was the people left on the 6th are whose not green, red, or  
4 yellow?

5 A Right.

6 Q Right. Which leaves, you know, the people like Kylie Kremer, some people  
7 at the beginning, Jennifer Halsey, State Senator Doug Mastriano, AG Ken Paxton, and then  
8 one, two, three, four, five, six, seven -- eight of the Women for America First speakers?

9 A Right.

10 Q And so it's like largely Women for America First speakers are yes and then  
11 basically 90 percent of everybody above Women for America First are no, maybe no,  
12 maybe they go somewhere else, like, pretty bleak looking for them, right, in terms of their  
13 speaking on the 6th?

14 A Yeah. I think probably what stood out to me more is that she considered  
15 Mike Lindell a serious policy speaker, but yeah. So there's a lot to unpack in this, but  
16 yes. Clearly, what my take from it was, was at this time is when I learned that, actually,  
17 Katrina was very close. I asked her to come in as an independent party to help me  
18 assess all of this. What I was unaware of was that she had a relationship with the  
19 Kremers dating back years and years, and I'd asked her to be paid by them, too.

20 And so then it kind of became apparent by the 2nd that, like, her -- it was just an  
21 extension of a third Kremer.

22 Q And, just to be clear, I know you said this, but did you have any  
23 conversations with anybody at the White House or the Trump campaign about the  
24 proposed speaker lineup?

25 A No. I never talked to anyone at the White House. I made her a

1 document, which she took into a meeting with the White House.

2 Q Can you turn to exhibit 40? So these are -- unfortunately, they're like  
3 printed back-to-back. They're two separate emails.

4 A Okay.

5 Q The first email is from Ali Alexander on January 4th.

6 A Right.

7 Q And he said: Media request spreadsheet attached. And I'm just going to  
8 use the last part -- 49.101Z, right? And then it looks like, on the next page, you forward  
9 that.

10 A Uh-huh.

11 Q I think maybe the same day, yeah, right afterwards to Hannah Salem, Megan  
12 Powers, and Justin Caporale. And Hannah responds: What link did these come from?  
13 We will add to main to list.

14 And then you respond: The groups that are actually organizing this event.

15 What did you mean by that?

16 A My emails got very sarcastic in tone around the afternoon of the 4th. What  
17 I meant by that -- so, as I mentioned before about why ignoring Ali didn't make sense, it's  
18 just that Ali wanted his own website, obviously, because you capture data when you've  
19 RSVPed, as with the Kremers or others, which -- fine, no problem, but at the end of the  
20 day, we need to know -- the RSVPs all need the same guidance memo and then for  
21 media -- like, there's one media credentialing hub that Hannah Salem ran. So I had  
22 asked Ali to please forward me the media credentialed request that he got through his  
23 website so that I could send to the media team so they would be on the list for the  
24 credentialing at the White House Ellipse. So that is what that was from.

25 Q Earlier I think you said something along the lines of, like, you didn't

1 care -- like, it wasn't your job to like care about speakers.

2 A Right.

3 Q This seems like you cared. Like -- and I don't want to put words in your  
4 mouth, but when I read it, there was like a tone of unjustness.

5 A Right.

6 Q And I guess that's -- like you said earlier a very valid point, it's very difficult to  
7 read these in a vacuum, especially time later. So kind of helping kind of like where your  
8 head was at, that day on January 4th at 7:10 p.m., which I think you said a minute  
9 earlier -- we'll come back to you, but I think that was probably after Ms. Pierson talked  
10 with the White House maybe?

11 A Right.

12 Q So, in terms of, like, where your mind is at when you're writing that, what  
13 are you feeling at that point?

14 A At this point, I was just -- I was frustrated in the constantly trying to  
15 marginalize others for no other reason than like personal vendettas that are irrelevant to,  
16 like, professionally executing an event. And, with Hannah, Megan, and Justin, like,  
17 they're all three friends of mine and so talking now that they were -- they also -- we're  
18 looking at all this in the same way that I was. We had no -- we don't know any of these  
19 people; we don't know any of these groups. And so they like would've understood what  
20 I meant when I made a comment like that.

21 Q And then on -- did you have a question on that?

22 [REDACTED]. No.

23 BY [REDACTED]:

24 Q On exhibit 23, you send Justin an email -- now, this is back on January 2nd.  
25 So we're going back a couple of days and this has -- I think is this for the web page, this

1 information -- yeah, website, I think, it's titled. So I'm assuming this is information to be  
2 put on the website? On the second page --

3 A Well, Justin wasn't in charge of a website, so --

4 Q Yeah. I was trying to figure out, if you look at the email from Justin to you  
5 on January 2nd, he says: Looks good to me. Kylie, Jennifer, and I just spoke, and they  
6 should be granting the request soon.

7 What request is he talking about?

1

2 [3:10 p.m.]

3 The Witness. I think I -- I can only -- I can speculate on what I think this was in  
4 reference to, but I'm just not positive.

5 That around this time we were trying to decide do we create a new website, and  
6 there's multiple floating around, to where it's an RSVP page that we run and the, like,  
7 data comes in to us. And especially because and then there's no contribution button or  
8 anything because it's not Women for America First or Ali's or anything like that, it's just  
9 one place where the data everything runs through.

10 And then it would be a mix of the participating coalition sponsors. So that would  
11 have been with input from Ali's site, or Cindy, or Women for America First.

12 So basically have a centralized website that I think, like, Taylor Budowich was  
13 supposed to create or something.

14 So I think what he's referencing here, if I remember some frustrations correctly,  
15 that Kylie was refusing to put onto their website other, like, organizing coalition partners.  
16 And he was trying to mediate that situation. Because they wanted the registration site  
17 and what Trump tweeted to be driven to whatever their website was.

18 We were thinking of creating a different one. And so the Kremers were unwilling  
19 to have anyone else featured on the website. And so, like, I think that was him talking  
20 about, if they don't, then we'll pull the registration for their site and basically create a  
21 site.

22 [REDACTED]. Got it. Okay.

23 And so why did Women for America First have to -- oh, because they were  
24 granting the request to put all that stuff on their website?

25 The Witness. They had trumpmarch.com.

1 [REDACTED]. Got it.

2 The Witness. That was a website. Then there was stopthesteal.us, Wild  
3 Protest. That had something where it had all --

4 [Discussion off the record.]

5 The Witness. So the media credential section of this looks to me like it was copy  
6 and pasted from a, like, guest guidance memo of the past, because, like, the request  
7 wouldn't have gone to a Donald Trump email. I think we were -- these were the type of  
8 things to, like, lay out what would go onto a website.

9 [REDACTED]. Got it. Yeah. And the request was, hey, Women for America First,  
10 put this up first on trumpmarch.com. And your understanding was that Justin was  
11 saying, if they don't put this up soon, then we'll pull the registration from their website  
12 and make a different page and have, like, control of that other page. I thought that's  
13 what you were saying.

14 The Witness. Yeah, I think. And I don't think it would have been the speakers.  
15 I think it -- I remember there being some sort of issue with -- the only place where I'm a  
16 little confused is this 80 Percent Coalition or whatever Cindy Chafian's website. Wasn't  
17 it listed in this? Maybe it's on the other side.

18 But I think there was an issue related to they refused to put Stop the Steal on their  
19 site.

20 [REDACTED]. Okay. Did you tell -- let me rephrase that.

21 When do you remember telling Ali Alexander that he had been cut from speaking  
22 on January 6th?

23 The Witness. Text messages -- it either would have been the night of the 4th or,  
24 like, the morning or sometime on the 5th. Now, he was aware there were issues and,  
25 like, that there was a lot of pushback from the Kremers or others. And so, I don't --

1 BY [REDACTED]:

2 Q Would it have come after Katrina's meeting at the White House on the 4th?

3 A Yeah. I told everyone that there was no final decisions on speakers until  
4 the White House was going to make that decision, and, like, that meeting was happening  
5 on the 4th.

6 Q So in the email that Katrina sent that said tab 22, the evening of January 2nd,  
7 if you can just look at that again.

8 A Yes.

9 Q Tab 22.

10 A Oh, tab 22.

11 Q Yes.

12 A Yep.

13 Q You see it? Okay. So she sends that at 10:49 p.m. at night?

14 A Yeah.

15 Q And do you remember your reaction to seeing that? I know you've  
16 described. Were you angry, upset, confused? Just what was your, when you see this  
17 list, what was your reaction?

18 A I don't -- I can't speculate on my reaction. But we had a lot of back and  
19 forth on the 3rd regarding like, How about this list? Does this look more amenable?  
20 And, like, kind of continuing to edit it. So --

21 Q So if you look, I think it was in the front page of your binder, you see a news  
22 article that we labeled as exhibit 81?

23 A Yes.

24 Q For the record, this is an article written by Matthew Boyle and published in  
25 Breitbart News.

1 Do you recognize this article?

2 A Uh-huh.

3 Q Is that yes?

4 A Yes.

5 Q And if you go to the second page of the article.

6 A Okay.

7 Q And you look at the second full paragraph on the page, it starts, "The  
8 President is expected." Do you see that paragraph?

9 A Yep.

10 Q And if we just read, it says, "The President is expected to deliver remarks  
11 beginning at around 11 a.m. He will cap off an event in which several other high profile  
12 names, including Kimberly Guilfoyle" -- and it continues through several names, until it  
13 ends with Ali Alexander -- "are all among those expected to speak per a source involved in  
14 the matter."

15 Do you know who the source was for this article?

16 A Me.

17 Q Okay. And the names of the people listed here --

18 A Yep.

19 Q -- several of these were listed on Katrina's schedule that she sent the night of  
20 January 2nd that she said had been moved to the 5th. Is that right?

21 A Yes.

22 Q Including Ali Alexander?

23 A Correct.

24 Q Why did you tell Breitbart News that these people would be speaking at the  
25 Ellipse with the President, including Ali Alexander?



1 A Did you read the next paragraph?

2 Q I did read it.

3 A Okay. Well, as I read it, "Many of these speakers will" -- he said will also  
4 speak. Like I don't -- reporters don't allow me to read his story verbatim. But what I  
5 told him was some are speaking on the 5th, some are speaking on the 6th.

6 So when he's saying here many speakers will be speaking on the, like -- where I  
7 guess it may be misleading -- and others will also speak on the 5th. But unless that was  
8 a list of speakers who were speaking on the 5th or 6th.

9 Q So you think Mr. Boyle got this wrong in hearing from you about what the  
10 plans were for that day?

11 A No, I don't think -- to me, that's just like a tiny stylistic thing. I don't think  
12 it --

13 Q Well, to say many of these speakers above will also speak implies that all the  
14 people on the preceding paragraph --

15 A Right.

16 Q -- including Ali Alexander, would be speaking at the Ellipse event.

17 A Right.

18 Q Right?

19 Did you tell Mr. Boyle that Ali Alexander, for instance, would be speaking at the  
20 Ellipse event?

21 A No. I think it was here, like, a bunch of the people who are going to be  
22 speaking. He wanted to do it, like -- I talked to him about doing a story and him  
23 beginning, like, to be able to announce when the President was public.

24 And then he -- he works for Breitbart, so, like, he covers all of these people and he  
25 knows who the past organizers have been, and their websites, and who is publicizing their

1 speaking.

2 And so, by talking about them being, like, yeah, here are some of the speakers,  
3 but, like, I brought up to him not all these people are going to be able to speak that are on  
4 all these different websites. Some are going to be speaking on the 5th.

5 Q So -- okay. Did you provide him any documents when you spoke to him or  
6 did you just read this out to him verbally?

7 A I don't remember. I think we turned it over last night. I don't know if I  
8 sent him a document of the schedule or something, or if it was just say --

9 Q Do you have your communication --

10 A It was just verbally.

11 Q I'm sorry.

12 A Yeah. It was in the what was turned over. There was -- it would have just  
13 been the name Matt, his text messages.

14 [REDACTED]. I think it is in 80. Sorry. It's an unidentified Matt.

15 Micah, I know you're going to find it faster than me. Save us the  
16 embarrassment.

17 Mr. Kanters. Okay. Here we go. Okay. 684. That's where it starts.

18 [REDACTED]. Yeah.

19 Mr. Rowley. That's where it starts.

20 Mr. Parrish. What number did you say?

21 Mr. Kanters. It's 684, 684.

22 The Witness. So what I provided him was, like, website, like, if you look, like  
23 that. There was that one graphic that I think the one that was, like, Freedom Plaza, the  
24 Ellipse, the Capitol, March to Save America. I sent him that website which would have  
25 tracked the speakers that are listed. Like, those are the speakers that are always

1 promoting his website. And again, it wasn't categorized as 5th or 6th, it had all three  
2 events, and like here are the speakers.

3 So I sent him that. And then for some reason I sent him a Breitbart article. And  
4 then a promo video that was being promoted. And then a map of the Ellipse and like  
5 the guidance of where to enter in case. And then just like a picture I had taken of kind  
6 of the build-out. So everything was from, like, the public domain.

7 [REDACTED]. This was in the texts you produced last night?

8 Mr. Kanters. No. These -- this is from the original texts, the original. Our  
9 second is a brand-new production, labeled 407 to 891.

10 [REDACTED]. Okay. So this is 4 -- no, no, that's the production.

11 Mr. Kanters. That's the production number.

12 [REDACTED]. This is -- 684 is the Bates number.

13 Mr. Kanters. Yes.

14 [REDACTED]. Okay.

15 Mr. Rowley. For the record, this is not within exhibit 80. Is that right?

16 [REDACTED]. Oh, yeah, no. It is not in -- that was my bad. I thought -- it's  
17 earlier, in a different -- it's not in the binder, I don't believe.

18 BY [REDACTED]:

19 Q Did you hear from Katrina or anyone else you were working with on this that  
20 this article created confusion about who was going to speak at the rally on January 6th on  
21 the Ellipse?

22 A Yes. There was a text message chain that we were all on. And I think it  
23 caused confusion for -- I'm sure the Kremers being upset.

24 Q Upset because it -- because why?

25 A They were -- they were upset a lot. I didn't think much of it. The thread I

1 remember was kind of more like people, like, laughing-wise. I don't remember anyone  
2 being upset or angry or something like that.

3 Q So no one thought that -- you didn't hear from someone that they thought  
4 you had leaked this as a way to try to keep Ali Alexander and others speaking with the  
5 President on January 6th at the Ellipse?

6 A No. The idea was Boyle wanted to be able to break that the President was  
7 speaking. Breitbart's a good outlet to be able do that. I sent him information on here  
8 are the websites and like every -- in the public sphere. "The President announced 'I will  
9 be speaking,'" or something like that.

10 And he had a story teed up and it brought -- I mean, I honestly don't even  
11 remember if I, like, read that at that time, but, like, he goes into the 5th. And he  
12 does -- like, what I imagine the Kremers were probably upset about is why is it  
13 marchtosaveamerica.com and not their website. I didn't -- that's probably just the  
14 website.

15 But also he was talking about all three events, and March to Save America  
16 included all three events on their website, which is why he goes into all three events in his  
17 story.

18 [REDACTED]. All right.

19 BY [REDACTED]:

20 Q Just out of curiosity, is the order that those speakers are listed in the order  
21 that you provided it to him?

22 A I doubt it.

23 Q Was there any conversation with him about putting Kimberly Guilfoyle first?  
24 She's an odd one to lead with. I thought maybe that was a friendly thing that you did for  
25 her.

1           A    I think she's the most high profile of these names.  I don't know how you  
2 define who is more appropriate.

3           Q    Well, that's definitely not the -- I mean -- I don't know.

4           A    Yeah.

5           Q    I'm not the person to argue that, that's for sure, so --

6           A    Yeah, I --

7           Q    I just was curious because the order was such that I was like, oh, you know?

8           A    Yeah.  I mean --

9                   BY ██████████:

10          Q    Taylor had -- your friend, Taylor Budowich?

11          A    Yeah.  Right.

12          Q    He had told you the day before he didn't want to be involved in an event at  
13 which Kimberly or Don, Jr. or the President was sharing a stage with Ali Alexander, right?  
14 That's what he emailed you?

15          A    Yeah.  That was like -- it was probably in a moment of frustration over  
16 several other things.  And we talked many times throughout the day of the 3rd.

17          Q    He said it was destructive to the President's message to have Ali Alexander  
18 and Alex Jones share the stage --

19          A    Right.

20          Q    -- with the President.

21          A    Right.

22          Q    And so, here was an article saying that Ali Alexander would be sharing the  
23 stage with the President, right?

24          A    It's an article based off of very highly publicized websites.  And the purpose  
25 of the article was to break the news that the President was confirmed to speak, which he

1 did. And then it goes into the speakers that were on the website that had 50,000 RSVPs  
2 to it.

3 Q So you understood the website at that time to say that Ali Alexander would  
4 be speaking at the Ellipse event?

5 A Yes. I'm pretty sure he had a website up about the 6th for a month's time  
6 that had him speaking.

7 Q Specifically about him speaking at the Ellipse rally.

8 A No. What I remember at the website was it laid out all three events and  
9 there was a section: Speakers. And it wasn't, "I'm speaking on this day, and he's  
10 speaking on that day." But at this time of the 2nd I would imagine Ali was still hoping  
11 and expecting to be speaking at the Ellipse.

12 BY [REDACTED]:

13 Q Did anybody give you permission or authorize you to disclose that list  
14 publicly? Any of the organizations, the speakers, or anyone involved in the  
15 organizational planning of the rally?

16 A Did anyone give me permission to disclose a public website?

17 Q No, no, the list of speakers who were speaking?

18 A They were from the March to Save America website. They were all being  
19 publicized on the website.

20 Q Ah, okay.

21 And can you do me a favor? Can you turn to exhibit 57? These are your texts  
22 with Ms. Pierson. And right around the time, I think, before her email that night.

23 So her email -- the January 2nd email is at 10:49 p.m. And a few hours before  
24 that I think you text her probably one of the speaker lineups.

25 A Uh-huh.

1 Q And she says, "Ahh. I just realized this is all on the 6th. Political will freak  
2 out. I'll make some edits and the timeline is off. None of these people are going to  
3 only speak for 2 minutes."

4 Mr. Rowley. Do you see where this is?

5 The Witness. Yeah. This is --

6 [REDACTED]. Oh, I'm sorry. I didn't give you the Bates number.

7 The Witness. I know where it is.

8 [REDACTED]. It's 859.

9 The Witness. Right.

10 [REDACTED]. Apologies.

11 BY [REDACTED]:

12 Q What did you understand "political will freak out" to mean?

13 A White House political.

14 Q Who is that?

15 A Brian Jack.

16 Q And what did you understand, like, when you read that, did you understand  
17 that to mean Brian Jack will freak out?

18 A No.

19 Q What did you understand that to mean?

20 A That this was Katrina's opinion on these speakers, like very short. And right  
21 around this time as the same email with the red/green. So it may have been that she  
22 spoke to Brian Jack and he gave her the feedback of red, green, yellow.

23 Q Well, let me back it up for a minute. So your understanding is that this is  
24 White House political that she's referring to?

25 A Yes.

1 Q White House political, i.e., Brian Jack, will freak out.

2 Did you have any idea why she thought Brian Jack would freak out?

3 A Well, there's a ton of names on here, first of all. And so, I think usually  
4 when the President speaks the White House or the President makes a decision as to who  
5 will share the stage with him.

6 As we discussed before, these were just compiled Excel sheets of all the people  
7 that were expecting to speak and then dwindling it down to, okay, prioritize who your  
8 preferences are. And then ultimately it would, you know, be a decision then that the  
9 White House makes.

10 So I was trying to make this for Katrina and format it in a nice way that she could  
11 then have that conversation with them.

12 Q Okay. Can you turn to exhibit 57 and take a look at -- so this is, I believe,  
13 your text with Kristin Davis?

14 A 57?

15 Q Yeah. Oh, I'm sorry, 56, apologies, 56. And if you look at, like, the very  
16 last page.

17 A Yes.

18 Q These are your texts with her. And if you look, it looks like Sunday, January  
19 3rd they're flying. I think you arranged that flight for them from Fort Lauderdale. And  
20 just pause real quick on that.

21 Did Ms. Fancelli, was she a Roger Stone fan?

22 A I think kind of. She didn't know that much about him, but, like, she heard  
23 about him on Alex's show, I think, so --

24 Q And so she liked him enough to pay for his flight and the people on the plane  
25 to go to D.C.?



1           A     I arranged for Ms. Fancelli to -- she wanted to fly private. And then, when I  
2 connected with Kristin Davis, she had said that Roger was looking to fly private if I knew  
3 of anyone.

4           I asked Ms. Fancelli if she would mind picking up Roger in Fort Lauderdale. She  
5 said, "Oh, that would be great." And then when she decided not to come, instead of  
6 canceling the flight and all their transportation, she said just let them go ahead and take  
7 the plane.

8           Q     Okay. And so on the last page, this is I want to say January 5th, she is  
9 asking, "Any confirmation for Roger to speak on Wednesday? Pastor Mark Burns?"

10          So as of Wednesday, she does not know whether Roger is speaking on the 6th?

11          A     Right.

12          Q     Do you know if Roger is speaking on the 6th?

13          A     I never ended up knowing who until they went onto the stage.

14          Q     Did you know whether Roger Stone specifically was or was not speaking on  
15 the 6th?

16          Mr. Parrish. On this date?

17          The Witness. I was told after the meeting on the 4th --

18          Mr. Parrish. Wait a minute, Caroline.

19          On this date did she know?

20          ██████████. Yeah.

21          The Witness. Okay.

22          ██████████. Yeah. As of the time she received this text, did you know whether  
23 Mr. Stone was speaking on Wednesday or not?

24          The Witness. Which text message?

25          BY ██████████:

1 Q It's the very last page of 881. "Thank you. Any confirmation for Roger to  
2 speak on Wednesday? Pastor Mark Burns?" And it looks like it's Tuesday, January 5th.

3 A Yeah.

4 Q Sometime between 11:34 a.m. and 7:20 p.m., correct?

5 A So I didn't -- I didn't reply, because I didn't fully know the answer. This is  
6 now the day after when the President says, "I don't want anyone speaking other than  
7 myself, and hold music, and maybe the family." So that meant Roger too.

8 But at this point, it looks to me like I had not relayed that yet to Kristin, because it  
9 still felt a little bit fluid as to what was happening.

10 Q And similarly in exhibit 61, I believe these are your texts with Tim Enlow, this  
11 is, I believe, Mr. Jones' security -- I don't want to say security guard. Like head of  
12 security or like his guy. Can I just say his guy?

13 A I said chief of staff, even though I don't -- yeah.

14 Q Chief of staff. Okay. But he's the guy who's associated with Alex Jones.

15 A Yes.

16 Q And he says, I think if you go all the way to 484 on the bottom, this is  
17 Tuesday, January 5th at 8:07 p.m., "Are there going to be any other speakers, other than  
18 POTUS. What time do you recommend we get there, meaning VIPs?"

19 So he doesn't seem to know either if Alex Jones is speaking.

20 A No. I had told him that as of, like, at this time the only speaker was going  
21 to be the President, but, you know, if that changed I would let him know. That's why  
22 he's saying, "Are there any last minute updates? Are there going to be any other  
23 speakers other than POTUS." So he's saying that from the assumption of the President  
24 was the only speaker because I communicated that to him.

25 Q Okay. And did you have any conversations with anyone about their

1 security teams, like either Mr. Stone or Mr. Jones, in terms of I think you said that you  
2 had an F pin (ph), that you were allowed to allow people into the VIP area. Did you have  
3 a -- did you have conversations with them about getting them and their security into the  
4 VIP area?

5 A Yes, but just to fix it. So the VIP, like, they sent me their VIP list, and they  
6 included their security as names of people who -- the VIP badge, there was a thousand.

7 So, like, here I see speaker badge for Alex Jones. He sent me his. And his  
8 security would have been included probably in these names or something.

9 With Roger with security, I think Kristin maybe sent me that. But again, they just  
10 went on to the master VIP list. But there's a thousand names, like, you just get the same  
11 credential.

12 Q Do you remember allowing anyone into security who may have been  
13 dressed in -- how would you describe it? Military gear? Military gear?

14 What?

15 Mr. Kanters. Tactical?

16 BY [REDACTED]:

17 Q Tactical gear or military gear?

18 A I don't remember that. And we usually probably wouldn't allow that.

19 Q Do you remember seeing anyone in the VIP area who was wearing military  
20 or tactical gear?

21 A No.

22 Q Do you remember meeting either -- well, I don't believe Mr. Stone -- either  
23 Mr. Stone or Mr. Jones or Mr. Alexander's security details that they had with them on  
24 January 6th wearing tactical or military gear?

25 Mr. Rowley. Can you define what you mean by tactical or military gear?

1 BY [REDACTED]:

2 Q I mean, it's a hard thing. It's like a term of art. I mean, they look like  
3 they're either military or doing something tactical, which I hate to, like, use that, but I  
4 don't know how else to.

5 A Tactical, yeah. I know what that looks like and means. If they were just  
6 wearing, like, camo, that wouldn't be a problem, but typically --

7 Q I'm not talking about camo.

8 A No, this was for the -- and that's where -- if you -- if they were wearing -- you  
9 know, it's like a vest and there's things bolting out of it and stuff would be a bit of a red  
10 flag.

11 But also, if they were in the VIP area, anyway you would have to go through  
12 magnetometers and Secret Service to enter that area, so, like, you couldn't enter with a  
13 weapon. I mean, they would have then made it past Secret Service into, like, a separate,  
14 more secure area to it into there to make it into my VIP section.

15 Q Oh, no, no, no. I was not asking if you knew if anyone had weapons on  
16 them.

17 A Right.

18 Q I was specifically talking about attire --

19 A Yeah.

20 Q -- in terms of like --

21 A Right.

22 Q And not like --

23 A Right.

24 Q -- you know, hunters wear camo pants or camo.

25 A Yeah. Right.

1 Q I'm talking about like military or tactical clothing that --

2 A Right.

3 Q -- would make somebody look like --

4 Mr. Parrish. Caroline, don't keep interrupting her with yeah or right, because the  
5 poor court reporter has to take down who's saying what. And it's got to be driving her  
6 crazy. Let [REDACTED] finish her question and then you state an answer, please.

7 Mr. Rowley. [REDACTED], when you get to a convenient point, if we could take a  
8 break.

9 [REDACTED]. Yes, yes, yes.

10 Sorry. Go ahead.

11 BY [REDACTED]:

12 Q I was not talking about weapons, just did you see anybody in military or  
13 tactical gear in the VIP area?

14 A No.

15 Q Okay.

16 Can you turn to exhibit 54? These are your texts, I believe, with Mr. Budowich.  
17 So on 751? No. Did I write this down right? I did. Sorry, it should be 53.  
18 Apologies. The number is right, 751.

19 A Which exhibit is it?

20 Q Fifty-three. I misspoke, I said 54. I meant 53, excuse me. And the Bates  
21 on the bottom is 751.

22 So this is, I believe, sometime on January 2nd, maybe. Yeah, I think it is  
23 sometime between 12:53 p.m. and the next time is 3:31 p.m. on January 2nd.

24 So Mr. Budowich says, "Given the problem we know we will run into with all the  
25 people who think they are speaking but aren't, how about doing a broadcast hosted by

1 Katrina?"

2 What did you understand him to mean by, "Given all the people who  
3 think" -- well, let me -- "Given the problem we know we will run into with all the people  
4 who think they are speaking, but aren't. How about doing a broadcast hosted by  
5 Katrina?"

6 A That was in relationship with what Taylor and I had been discussing about  
7 how there were hundreds of people who thought they were speaking at an event on the  
8 6th. So given that we know it is going to be an issue, like, what if we -- we are just  
9 coming up with a creative option of other ways for people to participate at the White  
10 House Ellipse that wouldn't necessarily be on stage.

11 Q Okay. And if you could go back one page, I think they're talking about this  
12 website. And Mr. Budowich says, "So, yeah, I'm going to still continue to help Katrina  
13 and Justin when they call, but don't want to deal with all your B.S. It's hilarious that you  
14 asked me what is worked out on data."

15 What is he talking about "worked out on data"?

16 A I don't know.

17 Q "You handed hundreds of thousands of dollars to groups, mostly nutty,  
18 without a single actual agreement to do anything. You have literally zero legal recourse  
19 if they just walk with money and data and then act like I'm the problem."

20 Do you think he's talking about the data from registering for the site?

21 A Yeah.

22 Q And so, he seems to be saying that -- well, he seems to be -- I don't want to  
23 put words in his mouth, but there is a little bit of an accusatory tone there.

24 A Right.

25 Q Or like I would say a negative tone there. That you gave money and then

1 you have literally zero legal recourse if they just walk with the money and data. That's if  
2 they took the money and didn't put on the event, took all the registrations, and then had  
3 those lists?

4 A Right.

5 Q Okay. He says, "I have zero confidence there's actual money to pay  
6 Katrina, let alone me. And even if there was, still not worth it."

7 Did you have any conversations about what he meant by that?

8 A Taylor and I are good friends. Like he was just kind of -- you would have to  
9 back up and, like, read the texts leading up to it.

10 On the 1st, he was frustrated because I hadn't been answering his text messages.  
11 And then, I kind of yell at him over I thought his website looked bad. And he says, "Not  
12 everything has to be so dramatic." Like, to me it's just kind of typical banter between  
13 us.

14 And then I think he reaches a bit of a breaking point where he's kind of pissed off.  
15 And then we talk on the phone clearly. And then he's back. It's, like, okay, great, how  
16 about this? Like, that message was sent 10:49 a.m. and then, like, where he is basically,  
17 like, "I have zero confidence," and, "This isn't worth it, I'm out." And then at 12:53 p.m.,  
18 he's back in.

19 [REDACTED]. I think this may actually be a good time to pause, it that's okay. I  
20 just kind of noticed it's a good stopping point.

21 So we will go off the record at 3:40 before I make any comments about the  
22 canteen accidentally on the record. And there's nobody in the Webex.

23 And since it is 3:40, we went a little bit over for lunch, and I really want to kind of  
24 do a time assessment. Is there any chance we could come back at, like, 3:50, 3:55 at the  
25 latest for a quick comfort break?

1           Mr. Parrish. Yes.

2           Mr. Rowley. That's fine.

3           [Recess.]

4           ██████████. All right. So we're back on the record at 3:49.

5           We had just been talking about some speaker issues and basically some of the  
6 folks not knowing, up until January 5th, that they weren't speaking.

7           Did you tell Julie Fancelli that it was looking like a lot of these folks might not  
8 speak on the 6th?

9           Let me back up. What conversations did you have with Ms. Fancelli about who  
10 ended up speaking versus who she thought would speak?

11          Mr. Parrish. At what point in time are you asking?

12          ██████████. Ever.

13          The Witness. I tried to keep her out of too much of the weeds of all this, to just  
14 give her higher level reports. So I don't recall, like, specific conversations about  
15 speakers lists. Like, I do think at some time I told her that Alex wasn't probably going to  
16 be speaking on the 6th.

17          But I don't know how much she understood that, because she, like, texted me on  
18 the day of 6th saying, you know, when is Roger speaking or when is Alex speaking?  
19 Those are the names that she knew. But otherwise, we were not going back and forth  
20 regarding speakers lists.

21                       BY ██████████:

22           Q     Well, I guess the reason I ask is because all of the speakers that she  
23 mentioned didn't get to speak on January 6th. Did she ever mention that to you at all?  
24 Did you ever have conversations about that?

25           A     No.



1 Q Did she ever express disappointment or upsettedness in terms of how the  
2 program on January 6th at the rally turned out versus what she had envisioned at the  
3 beginning?

4 A I don't recall us talking after the 6th about, like, the speakers program and  
5 that being a priority of conversation.

6 Q There were other things to talk about?

7 A Right. So yeah --

8 Q Okay. On exhibit 42, you have an email on January 4th. I believe you may  
9 have referenced this earlier, but it's an email from your Gmail account -- actually, from  
10 you to you.

11 A Right.

12 Q And it's the Save America White House overview.

13 Is this the document you mentioned earlier that you prepared for Katrina's  
14 meeting with the President?

15 A I emailed it to myself so I could copy, paste, and text it to Katrina so she  
16 could have it on her phone.

17 Q So you texted it to her?

18 A Yes. So just I emailed it to myself so I could send it to her.

19 Q Okay. And what was your understanding of how this meeting came about?

20 A It was a meeting to review, to make final decisions on things like speakers  
21 lists, and to brief him on the day of events -- the events that day.

22 Q And prior to that, what did you understand her role to be, not necessarily  
23 what it was when you kind of invited her in to, for a lack of a better word, herd that cat  
24 (ph)?

25 But like what had her role been up until that meeting on January 4th? And by

1 that I mean, did she approve things like video? Did she have approval over things?

2 Mr. Parrish. Objection to form.

3 The Witness. I would say that she was information gathering. Like, she was  
4 similar to me, she was serving as a mediator between different groups and gathering  
5 information. But final approval on things, like how to -- I don't -- I don't recall a specific  
6 example of her approving something during this time.

7 BY [REDACTED]:

8 Q And do you know why Ms. Pierson had to meet with the President in person  
9 for this meeting?

10 A I do not.

11 Q What did she tell you following this meeting? Like, did you have any -- let  
12 me rephrase.

13 Did you have any conversations with her afterwards about that meeting?

14 A I did.

15 Q And what did she say happened?

16 A She said that they only were able to discuss this page. Like, they went over  
17 the speakers parts for a while, but really this part like they never really got to.

18 Mr. Parrish. So, Ms. Wren, when say this part, you need to say a page number at  
19 the bottom or a reference of what you're talking about, please.

20 The Witness. The speakers program was really, like, the main purpose of the  
21 discussion of what they had gone through. And that, for example, she hadn't gotten to  
22 bring up the requests. She had talked about the Members of Congress' participation.  
23 And then I don't remember any information being relayed to me about the schedule  
24 overview, or POTUS shout-outs, or rally coalition partners or things.

25 BY [REDACTED]:

1 Q And after this meeting, do you become aware that speakers have been cut  
2 from the speakers program?

3 A After this meeting I was told that the President wanted just himself to speak,  
4 and then rally music, and if his sons wanted to speak for a couple of minutes, then that  
5 was fine.

6 Q And who -- who told you that?

7 A Katrina.

8 Q Okay. And did that -- did your understanding of that ever change?

9 Mr. Parrish. Objection to form.

10 BY [REDACTED]:

11 Q Do you not understand the question? I can rephrase it. I'm not trying to  
12 confuse you.

13 A Yeah.

14 Q I thought you were saying: I understood when she left the meeting that  
15 the President wanted himself, rally music, and you said possibly the sons?

16 A That Don and Eric.

17 Q Don and Eric. At some point after that --

18 A Right.

19 Q -- did your understanding change in terms of what the President either  
20 wanted or would allow in terms of speakers?

21 Mr. Parrish. You're including him at the day of the rally?

22 [REDACTED]. Uh-huh, yeah.

23 The Witness. I struggled to answer with my understanding of the term. But my  
24 expectation was that that would likely change between the evening of the 4th and  
25 actually who went on stage on the 6th.

1 BY [REDACTED]:

2 Q And why do you say that?

3 A Because in my experience of 4 years of rallies, the schedule often changed  
4 many, many times leading up into the minutes right before when people went on stage.

5 Q How would that process work?

6 Let me rephrase.

7 A Right.

8 Q Who would have the ability to change that after the President said, "Me,  
9 rally music, two sons"?

10 A Right. A number of people. It's kind of open. I mean, there are a  
11 number of different ways a change like that would happen.

12 Q Really? What ways? Like, can you explain what ways would have  
13 changed after the President said, "Me, rally music, two sons"?

14 A There are different ways that people would lobby on behalf of a speaker that  
15 they wanted. And there were different ways to do that throughout the time of, like, a  
16 decision as having been made to the actual time of an event.

17 Q Can you explain that process for those of us who have no idea how it works?  
18 Who would you start -- who would you call to start the lobbying process?

19 A It depended on the event, who this person was, like.

20 Q So let me -- so for this event --

21 A Okay.

22 Q -- if you wanted to lobby to get somebody back on the stage --

23 A Yes.

24 Q -- on January 6th, after what the President said, who would you go to to  
25 lobby?

1 Mr. Parrish. You're asking if Ms. Wren wanted to lobby?

2 [REDACTED]. Sure.

3 Mr. Parrish. That assumes she did want to --

4 The Witness. That's -- yeah. Could you -- if you just ask me about a specific  
5 person that spoke that day, I can tell you if I recall the process of how that person ended  
6 on the stage.

7 [REDACTED]. Okay.

8 The Witness. That would be easier for me.

9 [REDACTED]. Was Mr. Alexander still being discussed as a possible speaker for  
10 January 6th at the Ellipse?

11 The Witness. There was no chance he was speaking that day.

12 [REDACTED]. And you understand that after the meeting on January 4th that  
13 there was no chance that Mr. Alexander would speak on January 6th at the Ellipse?

14 The Witness. I think maybe in the morning of the -- or part of the day of the 5th  
15 it was like, is this -- was that really what happened out of that meeting or is that just  
16 Katrina's view?

17 And then I confirmed with someone else that, no, that he really did just want him,  
18 like, this was going to be set. And so then going into the morning of the 6th, there was  
19 absolutely zero expectation or chance that, like, Alex Jones or Ali Alexander were going to  
20 speak. They didn't expect to speak. I didn't expect them to speak.

21 BY [REDACTED]:

22 Q Who did you confirm that with? A minute ago you said you confirmed with  
23 somebody else, not Katrina.

24 A I don't remember, but it is in the responsive documents somewhere saying,  
25 like, I confirmed with X. It would have been Justin or Megan.

1 Q Okay.

2 A And would have spoken with, like, Bobby or Max Miller or someone who was  
3 in that meeting. So just a secondary person.

4 Q And so could you take a look at exhibit 44? Oh, no, sorry. They  
5 mislabeled it. I believe it's exhibit 43. Yeah, exhibit 43. Apologies.

6 A Uh-huh.

7 Q So these are emails from Justin Caporale, "Reminder, we need video  
8 content."

9 And then Katrina -- this is I think one of the first emails I've seen kind of  
10 substantive, "Does anyone have written guidelines for the external content being shown  
11 at the Ellipse? Example, use of POTUS, two, portraying POTUS. If not, we need to get  
12 this in writing. I don't want anyone having to deal with the financial investigations of  
13 others."

14 What did you think she meant by that?

15 Mr. Rowley. Why don't you take a minute and read the exhibit. It's multiple  
16 pages.

17                     . Yes. Just let me know when you're ready. Oh, sorry about this.  
18 Apologies.

19 BY                     :

20 Q So what did you understand her to mean on January 5th when she said, "I  
21 don't want anyone having to deal with the financial investigations of others"?

22 A This was an attempt to once again keep out the Stop the Steal Coalition's  
23 participation.

24 Q What do you mean by that?

25 A And when we were having a conversation, a compromise when it was

1 decided that none of the -- like Ali or any of these other groups would not be having  
2 speakers, then -- we had already a little bit been planning on this, because you saw in my  
3 original schedule. It's like, okay, well at minimum like let these groups play a video.  
4 We can view the video content before and, like, that should keep [Inaudible]. So the  
5 people submitting a video were Turning Point USA, Stop the Steal, and RAGA.

6 There may have been -- those were the three I remember, maybe Women for  
7 America First made one. And so, that was the -- everyone agreed. So that was a good  
8 solution. And that was told to Ali and others. They were fine. Everyone was fine.

9 And then, when it comes down to sending, "Okay, we need video content," it was  
10 just another let's make up this thing to cause drama again for no reason.

11 Q So from hearing you, and you correct me if I'm wrong, all of these groups  
12 have been planning, all of these groups have been organizing, they were all supposed to  
13 speak on the 6th. They were cut from speaking. They were given the video.

14 A Correct.

15 Q And then the day before at 7:47 am she says, nope, these are new rules for  
16 the video, so they don't even get videos.

17 A Right.

18 Q Okay.

19 A And they'd spent money on videos and also they're legitimate organizations.

20 Q I did want to ask you if you could just quickly -- let me -- we'll come back to  
21 exhibit 43. But if you could really quickly turn to exhibit 41. This is an email where Ali  
22 Alexander, I believe, sends you his video.

23 A Uh-huh.

24 Q The video that you're talking about to be played on January 4th. And you  
25 included two videos in your production. I think one was the one Women for America

1 First submitted and I believe the other one was Ali Alexander, right? There were only  
2 two videos.

3 A There were two. And then RAGA's was a link. So I don't think I ever had  
4 that one saved somewhere so that there was no way to submit it.

5 Q And that's fair. I was just clarifying that --

6 A Right.

7 Q -- the two videos that you produced, one was RAGA -- one was Women for  
8 America First.

9 A Yeah.

10 Q And the other was Ali Alexander's. And Ali Alexander's is pretty -- he's in it  
11 a lot. And --

12 A Yeah. You can tell which one's his, correct.

13 Q So who created or produced those videos for Mr. Alexander? Do you  
14 know?

15 A No idea.

16 Q Who approved them to be used that day when he submitted them?

17 Like, prior to Ms. Pierson's email, like when they were going to be shown, who  
18 approved them being used on Jan. 6th at the rally?

19 A Yeah. I hadn't seen the video yet until he sent it. So as far as final  
20 approval, I'm not sure who that person would have been.

21 So this was a thread just saying, can we submit the video contents by, like, by  
22 noon tomorrow? And so Ali sent me his. And I forwarded it, like -- I don't know. But  
23 I think I sent it to this.

24 Q I think you sent it to Justin Caporale maybe?

25 A Right.



1 Q And then he says, "received, downloaded, and tested."

2 A Yes.

3 Q So it's ready to go. Is there anyone else, is there anyone who reviews and  
4 approves this in terms of whether it should be shown on January 6th at the rally?

5 A I don't know.

6 Q Was your -- did you have any understanding that that was a part of the  
7 process at all?

8 A No. I don't think there was a specific process that had been discussed.

9 Q And in the email at 1:17 a.m., you say, "Oh, my God. This video is so epic,"  
10 all caps.

11 And he responds, "Glad you liked it."

12 And then you said, "Epic video to play."

13 So did you watch the video?

14 A I don't remember if I did.

15 Q Okay. Do you remember watching it ever?

16 A I do not remember.

17 Q Would you have let a video go to Justin to be played without having at least  
18 reviewed it before it was displayed to possibly 50,000 people?

19 A Probably. But I think I would have assumed that Justin would have  
20 watched it. And, like, we would have compiled the videos at this point.

21 Q So you're -- were you assuming that if there was something wrong with the  
22 video, Justin would note it or raise a flag to somebody?

23 A Probably. I just -- I don't remember the contents of the video. And I have  
24 no way to watch it now to say, "I did see this."

25 Q We can actually play it.

1 A Oh, okay.

2 Q I mean, so -- let's table that, because I think we do have the ability to play it.  
3 It's pretty -- it's pretty memorable. So let's -- we'll put a pin in that for now, because I  
4 don't want to slow us down. But we can come back to that.

5 So let's go back for a second. I think we were talking about --

6 [REDACTED]. Forty-three.

7 [REDACTED]. Forty-three. Yeah. Thank you.

8 BY [REDACTED]:

9 Q We were on exhibit 43. And in the next email Ms. Pierson, after she raises  
10 the video content issue, and after she realizes she's using her donaldtrump.com email,  
11 she says, "Switching to my Gmail. The reason this is concerning is that some of these  
12 organizations are taking donations, structures listed on their websites or filings with the  
13 FEC. So we just need to be mindful to not put anyone in an embarrassing situation.  
14 This isn't the campaign or the RNC, so everyone is liable for their own work, that includes  
15 legally."

16 What did you understand that to mean, that sentence, "This isn't the campaign or  
17 the RNC, so everyone is liable for their own work, that includes legally." Understanding  
18 you're not a lawyer --

19 A Right.

20 Q -- I just want your personal understanding of it.

21 A I don't think I understood her point to this email.

22 Q When she says below it, "This is a Women for America First event, and we  
23 are allowing others to participate, ultimately, we're responsible" -- I think she's moving a  
24 word -- "for what's being presented," was it your understanding when she said "we're"  
25 she meant we as in Women for America First and she was lumping herself in with that?

1           A     Right. That is the first time where she, like, blatantly admits that. But  
2     yes, that was quite an evolution from when I brought her in on the 1st to help deal with  
3     them to then being a member of Women for America First.

4           Q     And when she says, "Moving forward, Justin and Megan are in full control of  
5     operations and this will be executed like every other event," does she mean like every  
6     other Trump rally that they had executed when they were all on the campaign together?

7           A     Correct.

8           Q     Okay. "All this for the Ellipse event, including credentialing and VIPs, will  
9     be submitted to them for review and final approval."

10          A     Right.

11          Q     A minute ago we had talked about, like, who had approval status and it  
12     seemed unclear.

13          A     Yeah.

14          Q     Had there been any rigid rules like this in terms of approvals put on prior to  
15     this?

16          A     No.

17          Q     Did Justin and Megan have that level of approval authority prior to this  
18     email?

19          A     I mean, I wouldn't have -- I have no -- that's why I sent the video to Justin  
20     and Megan. Like they are from an operations standpoint, if they were the, like, final -- if  
21     Justin had said, "I have a problem with this video," I would not have questioned it.

22          Q     If Justin had said, "I just don't -- like, we're not going to use this video" --

23          A     Right.

24          Q     -- and it had been Ali Alexander or Roger Stone, would you have said, "Oh,  
25     okay," or would you have said, "Well, why? This is up for discussion."

1 A No. I would have said, "Oh, okay."

2 Q Why?

3 A Because their judgment -- his judgment and Megan's was coming from  
4 where I felt like my judgment was too, not clouded by any other outside forces or dislike  
5 of personal -- of people on a personal level. If Justin would have watched it and he said,  
6 "downloaded, tested," tested means, like, he watched it, and, like, if Justin watched it,  
7 was alarmed by it, and came to me and voiced that concern, I would have been like,  
8 "Okay, we'll pull it," like Justin [inaudible].

9 Q So did you think that this line -- so did this line to you then not change  
10 anything because they were already having review and final approval?

11 A Yeah. I think she meant it as a way to kind of spite me, but in a way, like, I  
12 didn't -- it would be great with Justin and Megan having full approval over everything.

13 Q Including credentialing and VIPs?

14 A Yeah. Because Justin and Megan would have just deferred to me.

15 Q So in the email below, less than an hour later, your response, if you read it, it  
16 looks like you actually took a lot of issue with her email?

17 A I took a lot of issue with just like yet again we all agreeing to a plan and then  
18 them changing the plan shortly thereafter for personal reasons.

19 Q You said, "Reminder that Women for America First have put in exactly zero  
20 dollars into this event. So over my dead body will they be receiving all the credit,  
21 control of the content, and VIP credentialing.

22 "It's bad enough that we have stripped every other organization of their  
23 involvement, when in reality they were the creators of this event, are working extremely  
24 hard, driving people to attend, providing the funding for it, and have actually been" -- I  
25 got that wrong -- "have been actually pleasant to work with, unlike Kylie Kremer" -- I'm

1 inserting that -- "who has been a nightmare to everyone involved.

2 "If Women for America First want to come up with a million dollars today, then  
3 sure, they can have that sort of final authority. Otherwise, there's no way anything you  
4 just laid out is happening."

5 That seems very strongly worded.

6 A Yes.

7 Q Did you think that you and Katrina were equal in terms of your authority in  
8 the organizational structure here?

9 A I'm not aware of any organizational structure.

10 Q I mean in the sense that if Katrina said something, this email suggests you  
11 felt you had the ability to say, no, that's not happening.

12 A Right.

13 Q Okay. And so, then Katrina writes back and says, "Caroline, the permit says  
14 otherwise. My suggestion from here is to call the President and discuss with him  
15 directly. No one on this chain has the authority to override the White House."

16 A Right.

17 Q What did you understand her to be saying when she wrote that?

18 A I thought it made no sense. I don't think the White House was approving  
19 the credentialing process, or VIPs, or operations, or organizational structure of videos.  
20 Like, I think that was just her -- it doesn't -- it doesn't make any sense.

21 Q Did you think she was bluffing that she had been either in touch with the  
22 President or in touch with the White House to basically drop a gauntlet and say, "If you  
23 have a problem with this, call the White House or the President," which is the tone of  
24 that?

25 A Right. I don't think she was bluffing. She's saying, "My suggestion from

1 here is to call the President to discuss with him directly." That's obviously not a thing I  
2 ever would have done, or considered doing, or had the ability to do.

3 Q Well, it's politely worded, but it's essentially, if you don't like what I'm  
4 saying, take it up with the White House or the President, right?

5 A Right.

6 Q Did you understand her to have that level of authority where she could do  
7 that?

8 A No.

9 Q Okay. James Oakes (ph) is a video guy?

10 A No. He's operations.

11 Q Operations. And he says, "Checking in to see if we have anymore approved  
12 video content. Our team is downloading and prepping."

13 So did that just like disappear like ether in the wind? Like this whole  
14 conversation, like, what impact does it have on anything?

15 A Yes. By this point, I think there was two kind of clear factions of groups.  
16 And so, the rest of us were just trying to continue going on with executing events, which  
17 meant we were just looking for the video content to download.

18 Q Did you have any coordination with Members of Congress in terms of their  
19 attending the rally at the Ellipse? And by that, I mean I think earlier, when you were  
20 talking about the White House overview, there was like a section titled "congressional  
21 participation."

22 A Uh-huh.

23 Q I just wanted to ask you in terms of your involvement whether you had any  
24 contact with any Members of Congress related to their attending the rally at the Ellipse?

25 A The only Member of Congress I spoke with directly -- or I texted Tommy

1 Tuberville. It was more about him coming on the 5th. And then I was -- began  
2 communicating with his assistant to where it was not even an option for him to come on  
3 the morning of the Ellipse.

4 So that would have been the only Member that I spoke to directly. But there  
5 was multiple discussions over a couple days about if Members were going to come and  
6 how logistically that would work.

7 Q Did you text with Thomas Van Flein?

8 A Yes.

9 Q How do I pronounce that?

10 A Van Flein.

11 Q Flein. I think you mentioned him earlier, Mr. Gosar's chief of staff?

12 A Right.

13 Q Did you text with him about Mr. Gosar possibly attending the rally?

14 A I was connected with him because when you -- we were looking to do a bus  
15 through Capitol Police, to bus Members over.

16 When you do it, you have to have a Member sponsor. And so, I think that's  
17 where Ali had recommended Gosar and connected me with Tom Van Flein.

18 I then connected Tom with Maggie Mulvaney on my team to deal with basically  
19 like getting that bus and what Members would come and do it with Capitol Police, which  
20 ultimately didn't ever come to fruition. I think everyone just kind of got distracted.

1

2 [4:16 p.m.]

3 BY [REDACTED]:

4 Q And can you turn to exhibit 62 for me. Were you -- let's see. Were you  
5 on a call? I believe Mr. Alexander scheduled a call -- it might not be this page. Hold  
6 on.

7 A It's like the first or second.

8 Q Yeah. I think there was a call he scheduled talking with speakers.

9 A Uh-huh.

10 Q And I believe there were some Congressmen on it. Maybe -- I think there's  
11 a list somewhere. Gosar, Gooden, I think Lauren B, Marjorie and Kelly. I'm just -- I'm  
12 reading. This is I think how they -- I'm trying to find it.

13 A 515.

14 Q Thank you. Were you on that call?

15 A I was.

16 Q 505? 516.

17 Mr. Parrish. I think you said 515.

18 [REDACTED]. I was wrong. 515, I believe, into 16. Yes.

19 BY [REDACTED]:

20 Q Yes. So the call I believe is on 515 and the names are on 516: Gosar,  
21 Lance Gooden, Lauren B, Marjorie and maybe Congressman Kelly. And I'm assuming  
22 that's Lauren Boebert and Marjorie Taylor Greene.

23 And you said you were on that call?

24 A Yes.

25 Q Can you tell us what they discussed on that?



1           A    All -- I only got in on the beginning.  And Ali welcomed everyone.  And, in  
2   his introduction, he said, we've got several Members of Congress on the call.  And  
3   then -- so that's where afterwards I asked him, who were the Members of Congress that  
4   you were referencing, because I never heard any Members actually speak?  So I don't  
5   know if they were on.

6           Q    Okay.

7           A    And I believe that he introduced me early on into the call, and then I just  
8   gave a brief overview of the like logistics of the event.  For example, there will be a VIP  
9   section.  You'll have your own entry point.  And make sure you get all of your names to  
10  Ali to do that.  You'll pick up your credential that morning.  You'll need to bring a photo  
11  ID.  Logistical things such as that.  And then -- and then I got -- the call went on, and I  
12  dropped off.

13          Q    Okay.  And other than I believe you said the direct conversation -- or the  
14  text that you sent to Tuberville and the reachouts that you did to some of the staff, none  
15  of the Congresspeople, other than those who spoke on January 6th, took the bus or came  
16  or attended the rally on the Ellipse that you know of?

17          Mr. Parrish.  Objection, form.

18          The Witness.  No, there were Members that attended.

19                BY ██████████:

20          Q    Do you know who?

21          A    I know Madison Cawthorn attended, because someone had flagged that for  
22  me.  And so I flagged it for Justin that we needed an elevator for the stage in case he  
23  came.  He did come.  I know Mo Brooks came.

24          Q    Oh, right.  I'm sorry.  I was saying other than those who spoke.

25          A    Oh.

1 Q Like attendees or VIPs or VVIPs.

2 A I think that there were a few others that just came into the VIP section.  
3 The only other one I could think of would be Gosar.

4 Q Okay. I have some -- I'm going to put aside some questions just because  
5 I'm a little worried on time. So I'm going to -- I may have to come back to some things,  
6 so forgive me for that.

7 But can you go to exhibit 54? So, on this one, I believe -- oh, it's on 758.

8 A Okay.

9 Q On December 28th, Monday, you told Charlie Kirk: POTUS is now speaking  
10 on January 6th, so we need this to be a very legit operation in crowd building. I'm not  
11 comfortable with these other organizations. Can we step up Turning Point  
12 involvement? Also, I think you need to speak.

13 Was that the first day that you knew that POTUS was speaking for sure on January  
14 6th?

15 A That was the day that the event was moved to the Ellipse, per Secret  
16 Service's direction. So it was -- that move was made because -- under an expectation  
17 that he was likely to speak, and if he did, like, that was the only place where he would be  
18 able to.

19 Q Okay. So, on the next page, when he actually says, "who told you he is  
20 speaking," and you say "White House" --

21 A Correct.

22 Q Who did you mean?

23 A White House advance.

24 Q Who specifically?

25 A Oh, there was -- it was moved because of White House advance and Secret

1 Service.

2 Q Okay. So that would have been earlier when you said, well, Justin Caporale  
3 said it had to be moved from the one location to the other, so you thought that came  
4 from White House advance?

5 A It did. That was a result of his meeting with White House advance and  
6 Secret Service on the President speaking. And he couldn't do Freedom Plaza, so that  
7 moved to the Ellipse.

8 Q Okay. So you were talking about the Justin Caporale, that incident?

9 A Yes.

10 Q Okay. And, on exhibit 59, so that one was December 28th, and now it's  
11 January 1st, Friday, 2:47 p.m. Megan Powers says: Hey, Caroline, POTUS just tweeted  
12 that he's going to speak at 11 a.m. Let's get on the phone later to discuss how that  
13 impacts the speakers.

14 At this point, are you -- do you think at this point that POTUS is speaking at 11  
15 a.m., or is it still uncertain to you?

16 A Yes, I do think he is.

17 Q You do think he is speaking at this point?

18 A Right.

19 Mr. Parrish. [REDACTED], sorry, I don't have that exhibit. What date is that?

20 The Witness. This was January 1st.

21 [REDACTED]. Oh, I think this was one of the later -- the new ones that you  
22 produced.

23 Mr. Parrish. No, that's quite all right. January 1st.

24 [REDACTED]. January 1st, yes. I was looking for a Bates, and I didn't see it.

25 BY [REDACTED]:

1 Q Can I stop there. I just have to go back to this.

2 Exhibit 11, the Breitbart News article --

3 A Yes.

4 Q Or 81, excuse me, if you can just pull that up.

5 A Okay.

6 Q Again, that's dated January 3rd. Do you see that?

7 A Yes.

8 Q Okay. And the message that Megan sent you is January 1st, right?

9 A Right.

10 Q Telling you that the President just tweeted that he's speaking at 11 a.m.

11 A Right.

12 Q All right. So it's public knowledge that the President is speaking on the 6th  
13 at 11 a.m. by that point?

14 A There's a separate exhibit where it's -- where they say it's not public yet.  
15 And I think this would have been in an email. There was an email that was, like, is it  
16 public yet or something where they say hold.

17 BY [REDACTED]:

18 Q I think you're talking about the Megan Powers email, isn't it? Or isn't it she  
19 that said something along the lines of like until it's absolute confirmation --

20 A Right.

21 Q -- or something like that?

22 A So what I bet happened here is that he retweeted a tweet about the details  
23 of the Ellipse rally. But there's -- there's a difference between being like confirmed,  
24 which is usually done 48 hours outside an event, where it's then publicized with official  
25 graphics or things, and then -- like, he'd been tweeting since December 19th: I'll be

1 there, historic day.

2 So it's not abnormal for him to be tweeting. But the confirmation and everything  
3 is usually like not done until later.

4 BY [REDACTED]:

5 Q Okay. That's fair. But on exhibit 81 --

6 A Right.

7 Q -- the paragraph, the second full paragraph on the second page about who's  
8 speaking at the Ellipse event --

9 A Right.

10 Q -- you're the source who provides those names, right? It says: Per a  
11 source.

12 A Yes, but I also on that day sent him that link with the speakers, like. But I  
13 don't think Ali had Kimberly advertised on his website.

14 Q And you're talking about MarchtoSaveAmerica.com?

15 A Yes.

16 Q When you look at MarchtoSaveAmerica.com, it doesn't list speakers. Do  
17 you know that?

18 A No. I can't see it now.

19 Q And, if it did, wouldn't it just say you can see on the website who the  
20 speakers are instead of saying attributed to a source?

21 A They like to attribute things to sources. And somebody like -- I know  
22 Kimberly wouldn't have been on that site.

23 Q That's right. If you look at exhibit 17.

24 A Yes.

25 Q And the back page, page 2, which is Bates No. 172.

1 A Right.

2 Q This is the spreadsheet that you created, right?

3 A Yes.

4 Q And so this is only for speakers on January 6th at the Ellipse event, right?

5 A Right.

6 Q If you compare the names on that spreadsheet?

7 A Right.

8 Q All of the names on that spreadsheet -- excuse me. All the names in the  
9 Breitbart article that are listed appear on your spreadsheet if you want to take time to  
10 compare it.

11 A So I don't see Kylie Kremer. I don't see Pastor Mark Burns. I don't see Bay  
12 Cagle. I don't see Brandon Straka.

13 Q No, no. I said all of the names in the Breitbart article that are listed appear  
14 on your list. There are more on your list, but all of the names in the Breitbart article are  
15 on your list.

16 A Okay. I don't understand the point.

17 Q I'm just asking, do you see that, that all of the names in the Breitbart article  
18 are on your list in exhibit 17?

19 A Anyone who like were high-profile who we were thinking were speaking  
20 were like publicized on sites.

21 Q Again, and your lawyers can look when we take a break. Look at the March  
22 to Save America site. There are no speakers listed there.

23 A Then, I mean, there might have been some on "stop the steal" or like I might  
24 have read speakers off to him. Like, I don't --

25 Q Is it possible you looked at your schedule and read them off to Mr. Boyle?

1 A Yes. These were all people who were confirmed to speak on the 5th or 6th.

2 Q But, at this point on the 3rd, Katrina had told you the night before on the  
3 2nd, right --

4 A Right.

5 Q -- that Ali Alexander, for instance, would not be speaking on the 6th, per  
6 White House guidance?

7 A Right. As I mentioned, like, this is supposed to be reference to the 5th or  
8 6th.

9 Q That's not how this is written. Just have to nail this down, Ms. Wren. The  
10 paragraph says, and it starts: The President is expected to deliver remarks beginning at  
11 around 11 a.m. on the 6th at the Ellipse.

12 Right?

13 A Okay.

14 Q He will cap off an event at which several other high-profile names,  
15 including -- and it lists all the names -- are all among those expected to speak.

16 Right?

17 A Right.

18 Q So I'm --

19 Mr. Parrish. You're quoting Breitbart, not Ms. Wren, right?

20 [REDACTED]. He's reading from the article.

21 [REDACTED]. Well, she is the source for the article.

22 Mr. Parrish. But you're quoting Breitbart, what some reporter wrote, not what  
23 came out of her mouth.

24 [REDACTED]. I'm just asking the question.

25 Mr. Parrish. Okay. I'm just making it clear.

1           ██████████. The way it's written is that these people are speaking on the 6th at  
2 the Ellipse with the President, right?

3           Mr. Rowley. ██████████, that's what the article says, but she already explained that  
4 she provided the list of speakers for both the 5th and the 6th.

5           ██████████. At that time, did you have a list of speakers for the 5th?

6           The Witness. Yes. We've been through this, like -- all of these people were  
7 confirmed to speak and being publicized on some website. And they were either going  
8 to end up speaking, I mean, at this moment in time, at the 5th SCOTUS event, which  
9 never existed, or the 5th the night before, or the 6th at the White House. They were all  
10 confirmed to speak at some sort of event on January 6th or 5th.

11           BY ██████████:

12           Q But here's the thing. I think I know what you're talking about in terms of  
13 like I'm posting, I'm speaking, I'm speaking, I'm speaking.

14           A Right.

15           Q And this is not in any disrespect to them, right? But if they self-proclaim  
16 themselves speakers, nobody really cares. It's when an article says that per a source  
17 involved in the matter, that gives them the imprimatur that they were appearing on the  
18 stage with the President on January 6th, that all of a sudden people cared about this list.

19           A Right.

20           Q And so the timing of it is such that -- I mean, this is not like super  
21 complicated/like even that weird, right? You guys did all this work. You said it in that  
22 email. All the people who did all the organizing aren't getting to speak. She just  
23 unilaterally decides. And the day that she sends that, that night I think you talk to a  
24 reporter and say: These are the people who are speaking.

25           Mr. Parrish. She didn't say that these are the people on the stage with the



1 President; these are the people on the 6th. She said, her testimony was, these are  
2 people who are going to be speaking on the 5th or the 6th.

3 Now, if the reporter wrote it as if it was the 6th --

4 [REDACTED]. And I appreciate that, but there's a distinction there, and I think we  
5 deserve to kind of like clarify it.

6 Are you saying that you did not tell that reporter that those individuals were  
7 speaking on the 6th?

8 [REDACTED]. At the Ellipse.

9 [REDACTED]. At the Ellipse.

10 The Witness. I can't answer that definitively. I don't remember the phone  
11 conversation that we had exactly. But I had to reference those text messages, which I  
12 had turned over. And, looking at the names, they were all people that were publicized.  
13 And the immediate paragraph afterwards is about the 5th. So, clearly, I would have  
14 brought that to his attention of there's an event on the 5th and the 6th.

15 And so I read this still, even though there's like one wording that says "and others  
16 will also speak" instead of like some will speak on the 5th, but that's not something that  
17 would have stood out to me at that time, and then directs them to a website that displays  
18 all three events.

19 Like, I didn't feel strongly about any of -- Boris Epshteyn or Diamond and Silk or  
20 any -- most of these are not even ones that ended up speaking on the 6th.

21 [REDACTED]. Okay.

22 [REDACTED]. So, in terms of the coordination between the events at the Ellipse and  
23 then the event at the Capitol, to your knowledge, was it planned for attendees to march  
24 from the Ellipse to the Capitol after the rally?

25 Mr. Rowley. At what point in time?

1 [REDACTED]. After the rally.

2 [REDACTED]. After the rally.

3 Mr. Rowley. At what point in time was it planned?

4 Mr. Parrish. There's a question about the time the march would take place or  
5 the time that somebody planned for a march to take place and a time somebody planned  
6 for a march to take place in that fashion. So it's ambiguous which thing you're asking  
7 about.

8 [REDACTED]. That's fair. Was it your understanding that, after the rally at the  
9 Ellipse, attendees would march to the Capitol?

10 Mr. Parrish. And you're asking her understanding as of what time? What date?

11 [REDACTED]. We'll start with when the event at the very beginning on December  
12 22nd was called Million MAGA March.

13 Mr. Rowley. And, [REDACTED], I'm not trying to be difficult, but, as you know from  
14 the voluntary interview, that changed over time.

15 [REDACTED]. No, no, no, that's what I'm saying.

16 I'm just starting from the first day when it was titled Million MAGA March, was it  
17 your understanding that people would be marching?

18 Mr. Parrish. From the first --

19 [REDACTED]. From the rally.

20 Mr. Parrish. -- day she understood that there was something called --

21 [REDACTED]. Right, right.

22 The Witness. No. The 22nd, I didn't even know an event was taking place.

23 [REDACTED]. So, as you begin to plan the rally and you talk to people on the 26th,  
24 to the extent that you can, when do you become -- at what point do you become aware  
25 of the idea that there is a plan to march from the rally to the Capitol?

1           Mr. Parrish. Just object to the form about begin to plan the rally, because  
2 obviously there are a lot of people planning. She was handling the logistics, but --

3           Mr. Rowley. Go ahead and answer if you can.

4           The Witness. I think it's easier for me to answer as of the day of the event on the  
5 6th. I had no idea that the President was going to say that there -- now we are going to  
6 march to the Capitol.

7                           BY [REDACTED]:

8           Q No, no, no, sorry, let me be clear. I'm not asking you when did the  
9 President plan for people to march. I'm saying, you know, there were -- you mentioned  
10 a minute ago that Ms. Pierson's email, I want to say on January 4th referenced, oh, and  
11 they're going to march down, they're going to pass SCOTUS, right? So there was some  
12 envisioning of event at the Ellipse and then marching to the Capitol.

13           A Right.

14           Q In exhibit -- and that's I think January 4th.

15                           In exhibit 61, you're talking with Tim Enloe. He says: Joe Flynn contacted me.  
16 He also wants to join Roger, Alex, et cetera, in leading the march to the Capitol. How  
17 can we get them VIP passes?

18                           Do you remember a time where it either became clear -- when did you become  
19 aware of the fact that part of the event would be marching to the Capitol after the event  
20 on the Ellipse?

21           A From the -- from -- it was always -- the event was called March to Save  
22 America. The website prior to even coming out was Trumpmarch.com. Like the  
23 Kremer women had march -- huge march buses with graphics all to it. So like I  
24 always -- I continually asked the question of like are -- is there some sort of march  
25 happening? There seems to be a lot of titling regarding march.

1           And so I asked questions throughout it, but there was never a confirmed march at  
2 any point, right? It was there was questions or there was discussions with Justin as to if  
3 this would make sense or not, and there was never a yes or a no. It was just an  
4 open-ended discussion.

5           Q     But, at some point, you have conversations with Alex Jones or Ali Alexander,  
6 right, about how are you going to get them out of the VIP area so they can get to the  
7 Capitol?

8           A     Right.

9           Q     And what do those discussions include?

10          A     Alex wanted to go with Roger Stone. Ali wasn't really a part of that.  
11 Ali -- so now -- I didn't really get the sense that Ali and Alex like knew each other very well  
12 or -- like, it was never a group text. Like, the conversations were kind of isolated. So I  
13 just never -- they may be very good friends, they might not know each other. So -- but  
14 Alex Jones' expectation was that he and Roger Stone would lead a march from the Ellipse  
15 to their rally at the Capitol. That also was Ali's rally or something. And -- but -- and  
16 they'd asked about like directions or things to do. And those were things I never could  
17 get or did get answers to.

18          Q     But at least -- is it fair to say that at least, as of January 4th, in Ms. Pierson's  
19 email, where she says, "The President envisions an intimate event followed by a march to  
20 the Capitol" --

21          A     Correct.

22          Q     -- people are at least aware that, at least based on that email, that she's  
23 representing that the President anticipated event at the Ellipse, march to the Capitol?

24          A     Yeah, that's what she said the White House had said to do.

25          Q     And did you have any reason to think that that was wrong, based on what

1 you had heard or seen, in terms of the organization of the event?

2 A No. I mean, everything was branded Trump march, and there was two  
3 events and a direct line between each other. So it seemed like something that could or  
4 would happen.

5 BY [REDACTED]:

6 Q To be clear, the event at the Capitol was Mr. Alexander's event, that's the  
7 one that you're referencing?

8 A Sort of. But I knew a bunch of people speaking at it. Like, Roger was  
9 supposed to speak at it, and Ali and Alex, and there was someone else who references  
10 that they were a speaker. So I never viewed anything as like one person's event. They  
11 were like coalitions of events and speakers. So --

12 I want to add that when I first got involved or heard about this, so probably on the  
13 26th, the route was like Ali's event was supposed to be in the morning, and then the  
14 evening was -- and Cindy references this in her Rally to Revival, you know, it's going to be  
15 evening.

16 So a march would have happened from the Capitol to Freedom Plaza in the  
17 afternoon, so basically away from the Capitol up to the White House. And then through  
18 this -- like the timing changes is what flipped that.

19 Q Okay. Could you turn to exhibit 78. No, excuse me. Yes, 78 in your  
20 binder.

21 I just wanted to talk about some of the speaker fees issues. I think you had  
22 conversations with Ms. Fancelli early on about possible speaker fees. If I'm  
23 remembering right, I think you proposed \$200,000, but it ended up being like minimal I  
24 think on your edited one.

25 A Right.

1           Q    But there are some individuals that do end up getting speaker fees.  And I  
2 want to talk about the two individuals that we know, Mr. Don Jr. and Ms. Guilfoyle, but,  
3 first, I want to ask you, do you know of anybody else who spoke on the 6th who was paid  
4 speaker fees for speaking?

5           A    You have to define speaker's fee.  If Katrina was paid 25,000 for Women for  
6 America First and then made herself one of the only speakers, would you define that as a  
7 speaker's fee?

8           Q    I would find that relevant, yes.  So, I mean, that's broader probably, but I  
9 can't say it's not.  So I appreciate kind of like the attempt to answer the answer within  
10 the question.  So not unreasonable that it was unclear, if she was paid the \$25,000,  
11 would it qualify as speaker fees.

12           Is there anyone else who, black, white, or gray, may have been remunerated for  
13 speaking on January 6th?

14           A    Not to my knowledge.

15           Q    Okay.  And this is really to clear it out of the way to make sure that I'm not  
16 missing anything.

17           In exhibit 76, there's an email from you to somebody named Rebecca Karabus at  
18 Capitol HQ regarding putting together two invoices to Turning Point Action.  Who is  
19 Ms. Karabus?

20           A    Sorry, it's exhibit which one?

21           Q    Oh, 78.

22           A    She is a friend of Kimberly and I's, a younger girl who sometimes assists with  
23 operational things.

24           Q    And Capitol HQ, had you used them before?

25           A    I've never used them or hired them or like worked with them in any capacity.

1 Q So your relationship was with Ms. Karabus, not with Capitol HQ?

2 A I don't know what Capitol HQ is.

3 Q Are you familiar with their association with Steve Bannon?

4 A No.

5 Q Okay. And --

6 A But that makes -- Rebecca works for Alexandra Preate.

7 Q And that is who?

8 A She's a friend of mine and Kimberly.

9 Q When you said "that makes sense" because I said Bannon, does Ms. -- and  
10 I'm going to -- Preate?

11 A Yes.

12 Q Does she have a relationship with Mr. Bannon?

13 A Yes.

14 Q A professional one?

15 A Yes.

16 Q Do you know what role, like if you could describe her professional  
17 relationship with him?

18 A I don't know.

19 Q PR, is that fair?

20 A She does comms, communications.

21 Q Okay. And did somebody -- you asked Ms. Karabus to put together the  
22 invoices to Turning Point for Ms. Guilfoyle and Mr. Trump to speak that day. Did Ms.  
23 Guilfoyle ask you to do that?

24 A Rebecca had helped before to make -- she had the format of a True Media  
25 invoice before. So I don't remember who asked who what, but it was not uncommon

1 for Rebecca to assist with something like that.

2 Q Okay. So it would not be uncommon for you, knowing that the  
3 speaker -- how the speaker fees worked, to ask Ms. Karabus to put it in an invoice for  
4 you?

5 Mr. Parrish. Objection, form.

6 BY [REDACTED]:

7 Q I guess it sounded like you were saying Ms. Karabus made these invoices in  
8 the past?

9 A Yes. She made invoices for True Media, for Kim. Like she had the invoice  
10 template.

11 Q Right. So can you create an invoice like you've done before?

12 A Right. Correct.

13 Q And so you had not -- apparently, I'm reading into this you had not run that  
14 by Ms. Guilfoyle, because she corrects you and asks you -- asks Ms. Karabus instead to  
15 make one invoice instead. Is that right?

16 A Can you rephrase the question?

17 Q Well, I'm just reading the two emails. You say: Please put together two  
18 invoices, one for Ms. Guilfoyle for 30,000, one for Donald Trump, Jr. for 30,000.

19 Ms. Guilfoyle responds 20 minutes later and says: So, actually, we're going to go  
20 ahead and invoice for 60,000 to True Media. I talked to Don for Kimberly Guilfoyle,  
21 Donald Trump, Jr., for Wednesday, January 6th, and I will just 1099 him, and I'll wire the  
22 money so it's my True Media LLC and Chase Bank account number and routing. And,  
23 Rebecca, you have it. Thank you so much.

24 A Right.

25 Q There's a lot of missing punctuation so I did the best I could, but the gist is it



1 sounds like you asked for these invoices, but she corrects it and asks for a different form  
2 where it's one for 60,000 to True Media?

3 A Correct.

4 Q And let me step back for a second. How did these speaking fees come to  
5 be? Who agreed to pay them \$60,000 to speak?

6 A Turning Point USA.

7 Q Okay. And who --

8 A Or Turning Point Action, I guess.

9 Q And who at Turning Point authorized that? Was that Charlie Kirk, or who  
10 said, we're paying Don and Kimberly 60,000 to speak?

11 A Can you rephrase the question as to --

12 Q Who authorized -- who at Turning Point authorized Ms. Guilfoyle and  
13 Mr. -- can I call him Mr. Trump?

14 A Yes.

15 Q Like Trump Jr.?

16 A Right.

17 Q Don seems -- Mr. Trump, Jr.

18 A Yeah.

19 Q Who authorized them to receive the \$30,000 payments from Turning Point?

20 Mr. Parrish. Objection, form.

21 The Witness. I don't know their authorization process. But I do know, like, that  
22 Don and Kim are often paid to speak at Turning Point events.

23           . Okay. So who would have authorized them to be paid to speak at  
24 this as if it were a Turning Point event?

25 Mr. Parrish. Objection, form.

1 [REDACTED]. Like, who is saying, we will pay you \$60,000 to speak on January 6th?

2 Who at Turning Point is saying that?

3 Mr. Parrish. If you know.

4 The Witness. I don't. I guess I still don't understand the question.

5 [REDACTED]. A minute ago, I said: Who authorized the \$60,000?

6 You said, Turning Point authorized it.

7 My question is, who at Turning Point said, yes, we will pay you \$60,000 to speak?

8 The Witness. I don't know.

9 [REDACTED]. Did they need to say, or did you tell them, Turning Point, to pay Ms.  
10 Guilfoyle and Mr. Trump?

11 The Witness. Yeah, that's why it's un -- it is not abnormal for them to get  
12 speakers' fees from events that Turning Point are involved in. Like, that's something  
13 that -- discussions I've had with Charlie before of other events.

14 BY [REDACTED]:

15 Q Did you discuss with Charlie paying Ms. Guilfoyle and Mr. Trump, Jr., \$60,000  
16 to speak on January 6th?

17 A Yes.

18 Q Okay. And did he say, yes, he was willing to pay that \$60,000 to them?

19 A Yes.

20 Q Did he do that by email, by phone, or by text?

21 Mr. Rowley. Did he do what? Sorry.

22 BY [REDACTED]:

23 Q Did he agree to the 60 --

24 A Yes.

25 Q How did he agree to the \$60,000 in fees?

1           A    I don't know the answer, but you have all of my emails and texts with  
2 Charlie.

3           Q    No, no. I'm just asking you. You said: I talked with Charlie.

4           A    Right.

5           Q    Did you verbally talk with him and he agreed to it? Did you email it to him?  
6 What was the mechanism by which he said, "I agree to pay \$60,000 for them to speak"?

7           A    Can you pull up my texts with Charlie? I'd have to look at my texts and  
8 emails. And if it's not in the texts or emails, it was by phone.

9           Q    Sitting here today --

10          A    Right.

11          Q    -- can you remember any conversation you had with him where you  
12 discussed Turning Point paying the \$60,000 for them to speak?

13          A    Yes, we would have had to have discussed it.

14          Q    Why would you have had to have discussed it? Couldn't you have just said  
15 they're going to get paid \$60,000?

16          A    Yeah, but that's a discussion.

17          Q    I'm asking you.

18          A    I mean, that's what I'm saying. Like, yeah.

19          Q    To [REDACTED] point, that was like could you have just said this, because  
20 you have a lot of control over the pursestrings? Could you have just said, Turning Point,  
21 you get X amount, and, in that, Don and Kimberly get \$60,000?

22           Mr. Parrish. Object to the form and the comment about control over the  
23 pursestrings, but --

24           Mr. Rowley. I think what counsel is asking is for your best recollection of the  
25 conversation you had with Mr. Kirk. If you recall a conversation, to the best of your

1 recollection, what did you and he talk about?

2 The Witness. We would have obviously had to have discussed it, but I can't  
3 recall specifics. But, again, I would note that it was -- it was not an abnormal  
4 conversation for Charlie and I to have.

5 And it was also not an abnormal act for Turning Point to pay for speakers' fees to  
6 Donald Trump, Jr., and Kim at events that they either host themselves or are titled  
7 sponsors of.

8 BY [REDACTED]:

9 Q And this is just to be clear: Was it your understanding that Charlie or  
10 somebody at Turning Point would have to authorize and approve that \$60,000 for them  
11 to be paid by Turning Point, or could you have approved that?

12 A I still don't -- I don't work at Turning Point.

13 Q I understand that. But you also don't necessarily work at some of the  
14 places that you raise money to that you send emails to saying: Budget this, budget this,  
15 budget this.

16 Right? You had some sway. You had some input on how the money was spent,  
17 right? You got these people huge donations that but for you they wouldn't have had.

18 Mr. Rowley. I hate to interrupt, but I'm not sure that that's a fair  
19 characterization of what she said. She's testified previously that she made  
20 recommendations with respect to the way certain money might be allocated.

21 This is a completely different matter. You're asking her about Turning Point and  
22 whether she had the authority to authorize a payment by Turning Point to True Media.

23 [REDACTED]. Right. That I thought would be a very straightforward question.  
24 Like, I'm just literally trying to figure out would Turning Point have had to authorize this or  
25 would you have had the ability to authorize it yourself?

1           The Witness. You used two different words. Earlier, you said input. Yes, I am  
2 able to give input to Charlie or Turning Point or any of these organizations on what they  
3 want to do.

4           "Authorize" is a totally separate word. I can't email the Turning Point CFO and  
5 direct him to pay an invoice to someone that, like, hasn't gone through probably their  
6 approval processes. So "authorize" is a very different word from input.

7           Mr. Rowley. So, Caroline, your answer, as I understand it, is no, you did not have  
8 the authority to authorize --

9           The Witness. Right. Okay.

10           BY [REDACTED]:

11           Q That's all I was getting at. Turning Point would have had to approve this.

12           A Yes.

13           Q Okay. And I really wasn't trying to make it complicated. Apologies if I  
14 made it more complicated than it needed to be.

15           Do you have any idea why Ms. Guilfoyle wanted the one wire to True Media  
16 instead of it being split as you originally proposed?

17           A Because I think the split doesn't make sense, looking at it, mainly because  
18 usually people aren't paid to like an individual bank account. Like, when someone pays  
19 me at Bluebonnet Fundraising, it's an LLC, right?

20           Q Okay.

21           A And so I have no knowledge of Don having an LLC or having a separate -- so I  
22 think it was more just like True Media LLC is one that I dealt with like before with Kim.  
23 So it just made more sense that it's an LLC and that money can be divvied up however the  
24 LLC deems it. Like, I don't know of Don having a separate one.

25           Q To the best of your recollection, is True Media owned by Ms. Guilfoyle?

1 A I have no idea.

2 Q Do you know her to be associated with it?

3 A I would hope so if her speaker fee goes there.

4 Q That's what I'm saying. Do you have any idea if she's an owner, if she has  
5 control? Like, is she an employee or is that her company?

6 A I have no idea.

7 Q Okay. Based on the fact that she wanted her money to go there, and I  
8 think you said you'd had a lot of -- well, you had had previous experience with True  
9 Media.

10 A Right.

11 Q What is your understanding of Ms. Guilfoyle's relationship with True Media?

12 A It's an LLC, the same way that my Bluebonnet Fundraising. Hers is True  
13 Media LLC.

14 Q So it's her LLC?

15 A I don't know. I have no idea if it's a sole proprietorship or a dually owned.

16 Q Is there anyone else that you know that's associated with True Media or that  
17 works at True Media?

18 A No.

19 Q Okay. Can you turn to exhibit 79. This looks like emails between Ms.  
20 Guilfoyle and an individual at JPMorgan Chase, and I believe you're included.

21 And Ms. Guilfoyle seems to be inquiring about the status of an incoming transfer  
22 of \$60,000. Was that in relationship to what we were just discussing, the speaker fees?

23 A Yes.

24 Q And I believe the speaker fee email was January 2nd, and this is now 4 days  
25 later, January 6th, at 4:17 p.m. Do you know why -- to the extent that you know, was

1 there any reason why she was checking on the status of the transfer?

2 A Well, this was an email from her, JPMorgan Chase, at 10:54 a.m. on January  
3 6th, saying good morning, like of him inquiring about it. And from my experience --

4 Q Let's back up for a second.

5 A It's important for you to go down. On January 6th, at 10:54 a.m., her  
6 accountant -- like, so she had inquired --

7 Q Oh, you're reading, sorry, the --

8 A Yes. So the -- that timing is significant because, in my own experience, too,  
9 at the White House Ellipse, there was no service. So I would imagine, you know, being  
10 done with the event and then she left immediately to go to a plane to leave, that she saw  
11 this email sometime of like getting onto the plane.

12 Her plane doesn't have Wi -- the plane that she took had no WiFi. And so I think  
13 what happened is she landed and then -- at 4:17 p.m. is around when her flight landed,  
14 and then that email came through.

15 Q Okay. And so she -- did you get the impression from this, understanding  
16 that it's just your impression, did you get the impression from this that she was  
17 concerned about the status of the wire?

18 A No, because she sent it on Tuesday, January 5th, at 6:18 p.m., to her  
19 accountant: Hey, it's Kimberly. Did the 60K hit True Media?

20 He didn't reply until the next day at 10:04 a.m. And then I kind of laid out like  
21 the timing again of where that -- so I think it's just an email chain and --

22 Q Just a normal check on the wire?

23 A Yeah. She checked on it on the evening of the 5th.

24 Q Can you turn to exhibit 77. These are emails between Mr. Caporale, the  
25 Kremers, you and I believe some other individuals. And it seems to be an agreement as

1 of December 30th what the fees to ESI would be for these events.

2 A Right.

3 Q And, if you go a couple pages in, the one at the bottom that reads, ending in  
4 219, there's an email from you to Turning Point Action -- excuse me,  
5 accounting@tpaction.com, at 1:55 p.m., and you ask Turning Point: Hi, please see  
6 Bluebonnet and True Media invoices attached. Could you please hold off until  
7 tomorrow morning on paying True Media.

8 Why did you ask them to hold off on paying True Media?

9 A I think probably because, at this time, we didn't have a final speakers list  
10 approved by the White House.

11 Q And so your understanding was, if she wasn't going to speak, you  
12 weren't -- that she was not -- True Media was not going to get paid?

13 A Correct.

14 Q Okay. And where did you get that understanding from? Like, what gave  
15 you that understanding?

16 A Because it was a speaker's fee. So it would be paid if they spoke.

17 Q Would Donald get his 30 if he spoke but she didn't? Or correct me if there  
18 was a package deal. I don't know how that works.

19 A I don't -- I -- it's pretty -- I have not thought of it like separately as separate  
20 packages, I guess. So --

21 Q If Ms. Guilfoyle hadn't spoken, would you have authorized the \$60,000  
22 payment? Excuse me. Would you have been okay with the \$60,000 payment going  
23 through?

24 A Probably not.

25 Q Okay. And, if we could turn to exhibit 71, these are some of the texts that



1 you exchanged with Ms. Guilfoyle. On January 4th, I just want to -- a couple of them,  
2 and I think these ones are a little weird. There's the ones that are at 4:56 and on.

3 On January 4th, you ask Ms. Guilfoyle twice: Don't forget to call Julie.

4 And then in all caps at 6:14ish, you say: CALL JULIE. What was so urgent for  
5 her to call Julie?

6 A I wanted -- she had not spoken to Julie during this whole process or  
7 anything. So I was asking her to please call and thank Julie for making these  
8 contributions and helping to support this event. I just thought it would be a nice thing  
9 for Kim to do.

10 Q Why?

11 A Because like Kim and I had spoken jointly before with Julie during the Trump  
12 campaign, and then but Kim had not been involved in any of this process. And so I  
13 wanted her and Don to call and thank Julie Fancelli, who was no longer coming to the  
14 event, just call and say thank you.

15 Q And this is an odd question, so, if it's not valid, correct it, but would you have  
16 said Ms. Fancelli at this point was her donor or your donor?

17 A I wouldn't say either.

18 Q For the purposes of the January 6th event --

19 A Right.

20 Q -- and what Ms. Fancelli donated for that event --

21 A Yeah.

22 Q -- would you have said Ms. Fancelli was your donor or Ms. Guilfoyle brought  
23 in that donor?

24 A Kimberly was our finance chair, so all donors were her donors.

25 Q Forever?

1           A    I mean, they're not -- no donor is like any more hers than mine, but if  
2    you're -- if that's the way that you're like looking at it in your mind --

3           Q    Well, no, I'm saying, if subsequently Ms. Guilfoyle said, "I brought in that \$3  
4    million donor," --

5           A    Right.

6           Q    -- would that be accurate, given the work or lack of work that she did in  
7    relation to January 6th?

8           A    It would be accurate. Like, because Kim was a principal, and so, you know,  
9    she did a lot of work cultivating Ms. Fancelli throughout the campaign.

10          Q    So, for the simple fact that she had that previous relationship, even if she did  
11   nothing related to the fundraising or organizing of January 6th --

12          A    Right.

13          Q    -- your position would be it would still be accurate for her to say it was  
14   her -- Ms. Fancelli was her donor for January 6th?

15          A    I think what you're referencing is a text message that Kim sent to Katrina  
16   that Katrina then leaked to the press. And so that like wouldn't bother me. It is not a  
17   strange thing that Kim would say, "my donor at 3 million," even though she hadn't been  
18   interacting with that donor and I had. That -- to me, that was a private message  
19   between her and Katrina. Like, so that makes sense. It's not strange to me.

20          Q    I was not asking if it was strange that Ms. Guilfoyle would send that --

21          A    Right.

22          Q    -- to Ms. Pierson. I was asking you if it would be accurate if she stated it  
23   after having done no work in relationship to as it pertained to the fundraising for January  
24   6th?

25          Mr. Parrish. Object to form.

1 BY [REDACTED]:

2 Q And, if I was understanding you, you were saying you would not contest if  
3 she said --

4 A Right.

5 Q -- that was my donor?

6 A Yeah. I mean, she cultivated her at the time of the campaign and then  
7 brought me in. We both talked to her. And so yeah.

8 Q And, if you could turn to -- I can't see the numbers at the bottom, but I think  
9 it's 459. Somewhere you say -- I cannot read these little numbers. You say something  
10 to the effect of you refuse me -- refusing to allow me to publicize. If you find it first -- I  
11 think it's when she's upset that you don't want to pay if she doesn't speak. Oh, here it  
12 is.

13 I think it is 459. I must have used a magnifying glass for this. But the top of it  
14 says: Really arrogant. Don speaking, and I will talk to him tonight. Don and Eric can  
15 speak, if they want, for 3 minutes.

16 And she says: And you will pay us. That's the deal so don't even think about it.  
17 And I will see him in an hour.

18 Do you know who she's referring to "him" there?

19 A I don't.

20 Q She says: You will send the funds as promised, and I'm going to deal with  
21 all these people. What an F'ing joke.

22 And you say: That is not fair. I can't pay you -- I'm going to correct a little bit:  
23 That is not fair. I can't pay you for a speaking engagement you aren't speaking at and  
24 are refusing to allow me to publicize, and not to mention I got humiliated in the process  
25 by these assholes. I am so furious.

1           What did you mean when you said "refusing to allow me to publicize"?

2           A    I think I had sent her a graphic and said:  Can I post this to your Instagram?  
3           And she had said no.

4           Q    Ah, okay, the picture.  Yeah, the picture of her.  I know which one you're  
5           talking about.  Okay.

6           A    Yeah.

7           Q    And on the next page, she says:  Bullshit.  Done for life, you and  
8           me -- which something is -- are you really hearting these at each other?  Like, there's all  
9           these hearts.

10          A    Yeah.

11          Q    Is that a like -- is that an accurate thing because it seems like something  
12          really mean comes through and then somebody loves it.  Is that a thing you do?  I'm  
13          just trying to make sure that that's an accurate -- like, that's not a screw-up on the emoji  
14          thing that comes through.  Those are, in fact, like the I press heart?

15          A    Right.

16          Q    Okay.

17          A    But that's me like hearting these.

18          Q    Oh, your own?  Yeah.

19          A    I'm hearting my own messages.

20          Q    Got it.  Okay.  That makes a lot more sense.

21          A    Yes.

22          Q    You say:  Really?  I am the one who set all of this up for you and is  
23          constantly looking out for you, and I lost to them.

24          Who is the "them" there?  Who did you lose to?

25          A    Katrina would have been one of the them.  I'm just trying to think of

1 who -- it's clearly plural so who the others would have been. Maybe Taylor.

2 [REDACTED]. A few pages back, you refer to Taylor, Andy, and Arthur.

3 The Witness. Arthur. Then that probably was the them.

4 BY [REDACTED]:

5 [REDACTED]. And the gentlemen that [REDACTED] just listed, the Andy and the  
6 Arthur, those are I think people associated with Don Jr.?

7 The Witness. Yeah.

8 [REDACTED]. Is it Andy Surabian?

9 The Witness. Yes.

10 [REDACTED]. And Arthur Schwartz?

11 The Witness. Yes.

12 BY [REDACTED]:

13 Q Why did you feel like you lost to them?

14 A They didn't want Don to speak.

15 Q But he did end up speaking, right?

16 A Right.

17 Q Do you know why he ended up speaking even though they may have  
18 suggested otherwise, if you know?

19 A There was a lot of people ended up speaking who at various points were or  
20 were not speaking. So --

21 Q Did you have any conversations with Ms. Guilfoyle about whether she had  
22 anything to do with Don speaking that day?

23 A Can you rephrase that?

24 Q Well, if I understood you, you were saying that Don Jr.'s -- for lack of a better  
25 word I'll call them advisers --

1 A Right.

2 Q -- the gentlemen you were talking about, suggested that he not speak on the  
3 6th.

4 A Right.

5 Q Do you know why they suggested that?

6 A I think it goes back to when, like, Taylor didn't want him to.

7 Q He didn't think it was a good idea for him to be on stage with Ali Alexander  
8 and Alex Jones?

9 A Right.

10 Q But Don Jr. does end up speaking on the 6th, and it's very clear -- I should say  
11 it strikes somebody who's reading the text that Ms. Guilfoyle was very interested in  
12 speaking that day.

13 A Right.

14 Q And my question is, is did you have any conversations with her about  
15 whether she attempted to persuade Don to speak that day?

16 A No. Don was the one who wanted to speak. Kim was hesitant, didn't  
17 really want to go to D.C. that day. So I think I just want to be clear there. Don had  
18 agreed to speak as early as like the 1st.

19 And Eric was the first to agree. So I flagged it for Don that Eric was speaking.

20 And Don said: Oh, I think we should speak.

21 Kim didn't really want to travel to D.C. So I just want -- if that's --

22 Q No, that's fair.

23 A -- like, this is not later on stuff, but to be fair to them, both parties, like that's  
24 sort of --

25 Q And it was your understanding that Don basically had advisers who said:

1 Don't speak.

2 He wanted to speak. And so did you get the impression that he convinced Ms.  
3 Guilfoyle to speak?

4 A No. Then I think Kim was fine once Don was. Like, it wasn't -- and also,  
5 we're talking about conversations isolated to advisers. Like, I don't know that Taylor,  
6 Arthur, Andy ever brought to Don's attention their issues with Don speaking. I have no  
7 recollection. I have no firsthand knowledge of that ever happening.

8 Q Right after that, you say: If you'll -- I think you mean if you all; I'm just  
9 substituting -- if you all are speaking, obviously you will get paid. Julie has been burned  
10 so bad in all of this. So, if I have her pay you \$60,000 to speak at an event and then you  
11 don't speak, how does that make me look? I just can't do that. She would never speak  
12 to me again. She only cared about you speaking.

13 So I want to unpack some of that. What did you mean when you said "Julie has  
14 been burned so bad in all of this"?

15 A I think that was just -- I sensed at this same moment in time a frustration of,  
16 like, the speakers and who was -- then not necessarily like reflecting like who the ones  
17 that she knew of or liked. So this is at that like same sort of timing of that.

18 Q That, basically, the event that she gave all this money that she envisioned  
19 was nothing -- well, with the exception of President Trump, which was a very like  
20 important exception.

21 A Yes.

22 Q With the exception of President Trump, it wasn't really the event that she  
23 had envisioned from the beginning. Is that fair?

24 A No. She never, again, vocalized any of this. Like, I just know the names of  
25 people that she liked. Like, she knew Kimberly Guilfoyle's name because Kimberly was

1 the finance chair, and she dealt with her. She knew the President. She knew Alex  
2 Jones. She knew Roger Stone. She heard of Charlie Kirk through like the by connect to  
3 them.

4 But, like, for her, she never directed me to like that this person has to speak or  
5 you need to -- one way or the other. Like, those were just the names I knew that she  
6 knew. Like, she didn't know who the Kremers were.

7 Q So if she -- so, if Ms. Fancelli didn't necessarily -- then why do you say "she  
8 only cared about you speaking"?

9 A Because like I -- I don't know. It's just a text at that time of a very weird  
10 chain. But she would have -- like she loves Kimberly.

11 Q Let me ask you something: Was that factually accurate or was that  
12 something to try to make somebody calm down or feel better?

13 A It could be either.

14 Q Because after 4 hours, the impression that you gave for Ms. Fancelli was not  
15 that, above all, she cared about Kimberly Guilfoyle speaking. So this seemed like  
16 something that a friend says to somebody trying to make them feel better.

17 But, in terms of the factual accuracy for our report, would you have really said  
18 factually that Ms. Fancelli only cared about Ms. Guilfoyle speaking?

19 A Well, I mean, she would have wanted -- like, I did discuss the speaker's fee  
20 with Ms. Fancelli, right? And for -- and so --

21 Q Let me back up for a second.

22 A Right.

23 Q I am not saying that Ms. Fancelli did not like Kimberly Guilfoyle and wouldn't  
24 have enjoyed seeing Ms. Guilfoyle on the stage.

25 A Right.



1 Q But, to the extent, if somebody was reading this sentence and somebody  
2 said, fact or -- true or false, Ms. Fancelli only cared about Kimberly Guilfoyle speaking,  
3 would that statement be true?

4 A I think that that statement was in relation to Kimberly, Don, Eric, first of all.  
5 It wasn't that, like, she didn't -- she only cared about Kimberly speaking and, like, not the  
6 President of the United States speaking or something like that. I think that that would  
7 have been referring to the three of them, if you go back a page.

8 Q I don't know what you're talking about.

9 A "Don and Eric can speak," quote, "if they want for 3 minutes."

10 Q Right.

11 Mr. Parrish. Point out the page number you're talking about.

12 [REDACTED]. No, I see what she's talking about. I apologize. It's a valid point,  
13 because I can't see the Bates. I think it's 479 maybe.

14 The Witness. Right.

15 [REDACTED]. Micah, you may be able to blow it up and help us.

16 Mr. Kanters. It's something about the way the text messages -- I did the best I  
17 could to make them as large --

18 [REDACTED]. I know. We have the same problem, so I totally understand.

19 BY [REDACTED]:

20 Q I guess what I'm trying to figure out is you seem to be saying, well, now it's  
21 Ms. Guilfoyle, Don, and Eric, but the sentiment that you're expressing there, I'm trying to  
22 kind of like -- what we are doing is putting together a factual report, and we have to sift  
23 through statements, texts, emails and all these things that people are saying. And so, if  
24 you were to read this, she only cared about you speaking --

25 A Right.

1 Q -- and took that in a vacuum and said, in fact, was Ms. Fancelli so concerned  
2 Kimberly Guilfoyle speaking, I would have said, no. She had Ali Alexander. She had  
3 Alex Jones. She had the President. There were, frankly, far more people that she  
4 cared about speaking than Kimberly Guilfoyle.

5 And that's all I'm trying to get at is it sounds like you were trying to say something  
6 nice to make her feel better, not that factually Julie Fancelli only cared about Kimberly  
7 Guilfoyle speaking on the 6th.

8 A One correction there is Ms. Fancelli didn't know who Ali Alexander was.

9 Q I apologize.

10 A The only names I think in this pot that she knew were Alex, Roger, Charlie  
11 Kirk, who didn't come, and then Kimberly.

12 So I see what you're saying. And I don't know the exact context here, but  
13 reading it again, I think that "she only cared about you speaking" would have been a  
14 reference to like "you" as in you and Don or you as in you, Don, and Eric.

15 Q Okay.

16 A Which would have been -- like, Ms. Fancelli didn't have a relationship with  
17 Don.

18 Q Okay.

19 A But she did have one with Kim.

20 Q Got you.

21 Mr. Kanters. That would be Bates No. 460.

22 [REDACTED]. Thank you.

23 BY [REDACTED]:

24 Q So, then, on 461, you say: But as of now, Katrina and Taylor have  
25 sabotaged my entire event that I killed myself working on for 2 weeks.

1           How did they sabotage the entire event? What did you mean by that?

2           A    I think I was being dramatic.

3           Q    In what sense? And I'm not talking about you --

4           A    Well, I mean, they didn't sabotage -- like it's -- the whole conversation seems  
5 to be overly dramatic. And I think I was just meeting it with the level of drama at the  
6 time. But Katrina and Taylor had not sabotaged the entire event.

7           Q    Well, earlier you said: And I lost to them.

8           And then you say: Katrina and Taylor sabotaged my entire event.

9           And I was just trying to get a sense of like what did you feel you lost or what did  
10 they sabotage? The event as you envisioned it, as you -- like as you had hoped it would  
11 be, or like what did you feel you lost or like what did they sabotage?

12          A    Again, I just think I'm being dramatic here. But, at this time, this is right  
13 after it when I relayed that. And I knew that like the President didn't want anyone to  
14 speak but himself and hold music, but that was also going to end up including Katrina  
15 Pierson, Kylie Kremer, and Amy Kremer.

16          Q    And on the next page, I think it's 462, you say: And I can't even get you to  
17 pick up the goddamn phone and thank Julie after asking you 70 times. This poor woman  
18 has donated a million dollars to Don's Senate PAC and \$3 million to this rally, and you all  
19 can't take 5 minutes out of your day to thank her. It's so humiliating. And then you  
20 have the audacity to ask me why I won't have her pay you \$60,000.

21          Other than you, did anybody ever actually call to thank Ms. Fancelli?

1

2 [5:15 p.m.]

3 The Witness. I think I had Don and Kim talk to her on the 5th.

4 BY [REDACTED]:

5 Q On the 5th?

6 A Yeah.

7 Q Okay. And I know you put in like some requests that you tried to get for  
8 her -- and I think AG Paxton maybe -- and those didn't get granted?

9 A It was -- those were never responded to. And, to my knowledge, the  
10 President didn't call her and I never followed up. I have no idea if General Paxton did  
11 meet with him or not.

12 Q On 466, that may be -- oh, that may be on the next page.

13 Did you write their speeches that day?

14 Mr. Parrish. Objection, form.

15 [REDACTED]. Sorry.

16 Did you write the speeches that Don and Kimberly Guilfoyle gave on January 6th  
17 at the Ellipse rally event?

18 Mr. Parrish. Objection, form.

19 The Witness. No.

20 BY [REDACTED]:

21 Q You did not?

22 A Not the speeches that they ended up giving.

23 Q Did you -- appreciate it.

24 A That's the technicality one.

25 Q No. It's an important one.

1 A Yeah. So --

2 Q Did you give them speeches to use -- whether they used them or not -- on  
3 the 6th?

4 A Right. I don't know if Don's speech was ever actually -- the one that was on  
5 my phone -- like, given to Don.

6 Q There was a speech that you produced --

7 A Correct.

8 Q -- that clearly referenced the President being that person's father?

9 A Right.

10 Q That looks like a speech written for Don, Jr.?

11 A Correct. I don't know if he ever saw that.

12 Q But you wrote it?

13 A Yes.

14 Q And gave it to him or Kimberly?

15 A It was pulled from language from like other speeches, which is something I  
16 would often help do, is when they would speak at -- several of their speeches in my inbox,  
17 and I would just repurpose those.

18 I don't know if that speech that was written in Don's voice was ever actually  
19 shown to Don.

20 Q Okay. And the speech that you wrote and gave to Ms. Guilfoyle, did she, in  
21 fact, use the speech that you gave her?

22 A I want to be clear about "wrote." Again, I had a lot of her speeches --

23 Q Compiled?

24 A So I would just repurpose and compile, yes. But it wouldn't have been one  
25 that she gave because we couldn't figure out a way to get it printed, which is why it was

1 sent to multiple people, kind of bounced around between Maggie and others, is because  
2 we couldn't get it printed.

3 And then, when she took the stage, there was not a podium, and I don't  
4 remember seeing any paper in her hands. And so I think that both she and Don just  
5 seemed to speak from memory.

6 Q Or they may have remembered what you wrote?

7 A Which were all like past speeches they had given.

8 Q Compiled?

9 A Right. Yes.

10 Q And it was less about, like, who wrote the prose that they said that day.

11 A Right.

12 Q It was more about that you had in some form tried to help the content of  
13 what they were presenting that day?

14 A I was trying to get something printed. Like, that's what I did from an  
15 operation standpoint and was never able to get that done.

16 Q Do you do that frequently for them, write --

17 A Oh, yeah.

18 Q Yeah. Okay.

19 A Or not write. Sorry. Print.

20 Q Compile, compile words into proposed speeches?

21 A Very much less so with Don. He had a speechwriting team. With  
22 Kimberly, yes, more so.

23 Q And on the last page, on January 6th at 12:01 p.m., you text Ms. Guilfoyle  
24 and ask, "Where are you?" And she says, "In warm tent, all of us."

25 Do you know what tent she's referring to?

1 A There were two. There was a tent on the left and right side of the stage.

2 So I think both would have been warm.

3 Q I guess what I more meant was is a tent like at the Ellipse?

4 A Yes.

5 Q Okay. And it could have been the one on the left or the one on the right?

6 A Right.

7 Q You don't know?

8 A Correct.

9 Q When she says "all of us," do you have any idea who she's referring to?

10 A Don and Eric.

11 Q Okay. And what makes you say that?

12 A And Lara. Because they were there. She was saying "all of us," so it  
13 would have been the family.

14 Q Okay. And just to be clear, your understanding when, like, the family, Don,  
15 Eric, Lara, her?

16 A Ivanka.

17 Q Ivanka. Tiffany?

18 A I don't remember her being there.

19 Q Fair.

20 [REDACTED]. I know I'm over and I'm trying to go quickly. If you could --

21 [REDACTED]. Can I just tie something off real fast?

22 [REDACTED]. Yeah, yeah.

23 BY [REDACTED]:

24 Q Did you talk to Eric Trump about speaking at the event?

25 A Nope.

1 Q How did you learn he wanted to speak?

2 A He tweeted something out about it. And so I may have learned from  
3 Twitter. I'd have to go back and see the date of that tweet. Otherwise, I would've  
4 heard it from a staff member or something.

5 Q Did you talk to Arthur Schwartz at all about the rally before it took place on  
6 January 6th?

7 A Most likely.

8 Q And what do you recall talking to him about?

9 A I talked to Arthur almost every day. So I would've talked to him in that  
10 window of time. But I think Arthur and Andy, like, didn't want Don to speak at the  
11 event.

12 Q Focus on Arthur. What did he tell you about why he didn't want Don, Jr. to  
13 speak at the rally?

14 A I have no idea. I can't recall that far, a year back.

15 Q The particulars. But the general nature of what he said about why he  
16 didn't want, was it similar to what Mr. Budowich had said to you in an email?

17 A It would have been similar in nature.

18 Q How about Andy Surabian? Did you talk to him about the Ellipse event  
19 before it took place?

20 [REDACTED]. Hold on. Somebody needs to go back on mute.

21 Thank you.

22 The Witness. I don't recall having a conversation with him about it, but I was  
23 talking to Andy frequently during that time because he was running Save the US Senate  
24 PAC. So when I spoke to him a lot during that time, 99 percent of our conversations  
25 were about that, so -- but I don't recall any, like, specific conversation about the



1 January 6th rally and his thoughts on it.

2 [REDACTED]. Well, then, with respect to Mr. Schwartz, did he -- do you recall him  
3 bringing up anyone in particular that he was concerned about Don, Jr. sharing the stage  
4 with at the rally?

5 The Witness. I don't remember from a year ago.

6 BY [REDACTED]:

7 Q Okay. There's a couple of things that I just want to go back -- well, tie a  
8 bow on or whatever the expression was. These are going to seem randomly out of  
9 order and I apologize, but I'm trying to kind of be judicious, like, with your time.

10 Do you remember dealing with Adam Piper at RAGA?

11 A Yes.

12 Q Do you remember any conversations with him about why he was so  
13 concerned that RAGA or RLDF not be on any of the marketing affiliated with the  
14 January 6th rally?

15 A Yes.

16 Q And what did he tell you?

17 A Had something to do with the White House lawyer project.

18 Q And you don't remember anything more specifically than that?

19 A Nope.

20 Q And could you turn to exhibit 28? There's a common theme, but this is,  
21 like, one that I can find. But there are several documents that discuss how low the RNC  
22 VIP list was at the event.

23 Can you explain why it was so low or do you have any knowledge of why it was  
24 low?

25 A There was one text that said that they requested 200 VIP.

1 Q Yeah.

2 A And so what I do when I keep some, like, is master tracker. So I had it  
3 down as 200 as an allocation to them. So here I would've been asking, you know, have  
4 we gotten their VIP list, meaning, we have them down for 200 per their request as an  
5 allocation, but we have to have names for that for the check-in. And so it says they only  
6 have two people as of now.

7 Q Any idea why?

8 A No.

9 Q Did you ever come to find out why?

10 A I don't know what their final allocation was.

11 Q Okay. And on exhibit 29 there's an email from -- I think it's between Taylor  
12 Budowich, you, Megan, and Justin. And you're talking about crowd building.

13 And Megan says, on January 3rd, at the very end, "White House hasn't publicly  
14 announced the trip yet. So we can't confirm he will be speaking yet. This is their  
15 preference."

16 A See, that's what I was talking about. Remember, earlier where I said he  
17 hadn't publicly been, [REDACTED], like announced yet, that January 3rd.

18 Q That was the one that you were talking about?

19 A Or you were talking about the, yeah, article. Like it wasn't until this -- it  
20 hadn't been made publicly yet. Sorry.

21 Q He tweeted over the past few D.C. events, "See you there, but he didn't  
22 actually speak at any of those. However, following Katrina's meeting tomorrow,  
23 hopefully we will get everything confirmed. So the idea was January 4th would be the  
24 day on which we would all actually know if he planned to speak for sure."

25 That was what it looked like.

1 A Yeah. Yeah.

2 Q Okay. Then she, Megan, suggests for additional crowd raising NCI can do  
3 GOTV calls. And she says, "Gary Coby's company does P-to-P text."

4 Do you know who Gary Coby is?

5 A Uh-huh.

6 Q Who is that?

7 A He ran the digital campaign for the Trump campaign.

8 Q And what is the company -- to the extent that you know -- that she's  
9 referring to there?

10 A I don't remember the name of his company.

11 Q Is it Opn Sesame? Does that sound right?

12 A Yes.

13 Q Okay. And she says, "Because" -- I'm assuming this is Donald Trump for  
14 President --

15 A Yes.

16 Q -- "still exists as a political campaign, we cannot rent the DJTFP list."

17 A Correct.

18 Q Do you know what she's talking about there?

19 A There's certain campaign finance laws in relation to list rentals. And I think  
20 if it's, like, an active campaign, it's considered an in-kind donation if you rent a list is what  
21 I'm guessing.

22 And so since DJTFP, I guess, at this time is still an open entity, then they weren't  
23 doing list rentals. So you'd have to -- but their, like, list rentals are a big thing that  
24 happens with Republican politicians. You rent lists from a number of places.

25 Q And I think this is attached to the wrong exhibit, apologies, and I really don't

1 want to wait to find it.

2 But there's an email that Justin Caporale sends where he refers to -- maybe it's  
3 this one -- he says "the campaign-slash-Dolman?"

4 Do you know who Dolman is?

5 A Shawn Dolman.

6 Q And who is that?

7 A He's the CFO of the Trump campaign.

8 Q Okay. All right. There's an email, exhibit 15, you guys are talking about  
9 the website for March to Save America. And I think Taylor Budowich suggests using  
10 something called Nucleus.

11 And he says, "I reached out to Nucleus campaign back end to do this, which would  
12 also solve the security issue. You say we are not allowed to use Nucleus."

13 What is Nucleus and why couldn't you use it?

14 A Nucleus is a digital firm. And I don't know why we're not allowed to use  
15 Nucleus.

16 Q Did somebody tell you that or --

17 A Someone would've had to.

18 Q Sitting here today, can you remember why you wrote that?

19 A No.

20 Q Or what it meant?

21 A I can't.

22 Q Okay. There's some communications, and this is just kind of like in all of  
23 the things that you guys are doing preparing. There's some car services that you  
24 arrange for VIPs. I think you do it for Mr. Giuliani and then at one point Mr. Bannon.

25 Did anybody ask you to do that?

- 1 A Alexandra asked if I could get a car to get Mr. Bannon.
- 2 Q Alexandra --
- 3 A Preate.
- 4 Q -- Preate.
- 5 A Uh-huh.
- 6 Q Okay.
- 7 A And Mr. Giuliani, his assistant, asked me to get a car.
- 8 Q Is that a normal thing that you do for people, kind of just arrange things for
- 9 them?
- 10 A Yeah. Yeah.
- 11 Q Okay. Is that like a common -- it seems like a --
- 12 A Yeah. I think if they're, like, a VIP or a speaker at something.
- 13 Q Okay. There's an exhibit 49, there's like an Afr Transportation for Mr.
- 14 Giuliani or Mayor Giuliani. It's \$936 for, basically, car service on January 5th and
- 15 January 6th. It says the customer is Maggie Mulvaney, Trump/Pence campaign.
- 16 A Right.
- 17 Q My guess is she probably just had that in there from before.
- 18 A Yeah.
- 19 Q But do you know who actually paid that invoice?
- 20 A I did.
- 21 Q You did?
- 22 A Yeah.
- 23 Q From where?
- 24 A My Bluebonnet bank account, Frost Bank.
- 25 [REDACTED]. Just to check, do you guys have a hard stop, because we are making

1 really good time, but we are -- we would like to cover a couple more things?

2 Mr. Rowley. How much longer do you think you need?

3 [REDACTED]. 30, 45 minutes.

4 Mr. Rowley. We'd like --

5 [REDACTED]. It's 5:30 now.

6 Mr. Rowley. We finish just today and we're done?

7 [REDACTED]. Can we make that representation?

8 [REDACTED]. So far as we know.

9 Mr. Rowley. She's not subject to recall or anything?

10 [REDACTED]. I don't know that we have the authority to say that. But I don't, like,  
11 right now -- I mean, sans there being, like, more produced things -- and it sounds like right  
12 now there's just, like, a couple of things that slipped through -- but sans that, I don't see  
13 why not. But I don't know that we can say that on behalf of the committee.

14 Mr. Rowley. But that's your intention?

15 [REDACTED]. Right.

16 Mr. Rowley. Caroline, you okay to power through?

17 The Witness. Yeah. I'm just going to draw your attention to the document that  
18 I made, the presentation for you all.

19 [REDACTED]. We didn't get copies of those. We just took notes.

20 The Witness. Oh, okay. The 936 for Afr Transportation Services, like my  
21 personal expenses, though, that's what that was.

22 [REDACTED]. Appreciate that. Okay. That's helpful.

23 Okay. So we just want to cover some of the events that happened on  
24 January 5th.

25 Where are you on January 5th? I mean, I know you're in D.C., but just kind of

1 like walk us through what happens on that day.

2 Mr. Parrish. What she did that day?

3 [REDACTED]:

4 Q Yes, just you.

5 A Just me.

6 I think I would've done a like site walk through at some point at the Ellipse. And  
7 then I went over to the Willard at some point and then dropped by the rally thing going  
8 on, like the Freedom Plaza one. And at one point I walked Peter Navarro over to that  
9 event and he spoke.

10 And then that evening we had an event at the Trump Hotel. It was just a cocktail  
11 watch party. And then I went back to the Willard and went to bed.

12 Q Okay. There's a lot in there.

13 So you do the site walk at the Ellipse. And who is that with? Is it the advance  
14 team?

15 A Yeah. It would have been, like, the advance team. I think the Kremers  
16 were out there, like. I think my team was out there.

17 Q The organizers? Is that fair?

18 A Yeah, yeah, the organizers.

19 Q That's a little vague. Let me object to form before you can.

20 Mr. Parrish. I was going to.

21 The Witness. It had a staff roll, like, the morning of the 6th, the walk-through  
22 was to say, here's where your registration desk is, here's where seating is. So it's like  
23 anyone who's in that staff plan.

24 [REDACTED]. Like identifying for logistical purposes --

25 The Witness. Right.

1 [REDACTED]. -- what was going to happen?

2 The Witness. Correct.

3 [REDACTED]. Okay. And did they do one of those for Freedom Plaza or just the  
4 Ellipse?

5 Mr. Parrish. "They" being who?

6 The Witness. Yeah.

7 BY [REDACTED]:

8 Q Was there a site -- would you have been involved in the site walk-through at  
9 Freedom Plaza if there had been one?

10 A No, none of us would. But we weren't a part of the staff plan --

11 Q Got it.

12 A -- for the Freedom Plaza.

13 Q And after the site walk -- how long does the site walk at the Ellipse last?

14 A It would depend on who was -- who you're talking about. Like, I think  
15 Justin would have spent all day there.

16 Q But you?

17 A For me, I just needed to see where the registration desk would be, so I went  
18 to, like, a shorter portion.

19 Q Was part of the site walk-through, were Secret Service agents present?

20 A I doubt it.

21 Q Did you ever -- did you have conversations with any Secret Service agents on  
22 January 5th?

23 A Not that I recall.

24 Q Okay. And I think you said from there you went to the Willard. Is that  
25 right?



1           A    I don't know the specifics of where I went from each place, but I definitely  
2 went over to the Willard a couple of times that day.

3           Q    Was that for events or was that just where you were staying?

4           A    I wasn't planning to stay there. I ended up staying there, because I  
5 had -- Julie had rented a room there and then didn't come. And so it was much more  
6 convenient.

7                    But we delivered -- the credentials got in, like, late that afternoon or something  
8 like that. So we went over there to drop those off at the hotel and kind of split them up  
9 by colors and stuff like that.

10          Q    And what -- somebody asks you to walk Navarro to Freedom Plaza, right, if  
11 I'm remembering right? I feel like there was a text or somebody -- you were doing  
12 somebody a favor? Are you just friendly with him? I can't remember. I may be  
13 misstating.

14          A    No, I didn't know him prior to this. So, like, I don't know how I  
15 would've -- it may have been Alexandra Preate who put me in touch with him.

16          Q    If there's an Alex in your text, is that her? Or do you remember how you  
17 stored her in your phone?

18          A    I think it's in there as Alexandra.

19          Q    Okay. I wasn't sure if you were close enough to store her name or if she  
20 would've just showed up as a number?

21          A    Right.

22          Q    And so in terms of timeline of like the events that evening, can you walk me  
23 through kind of like what happened?

24          A    The event at the Trump Hotel?

25          Q    If that's, like, the first event. Like, just take me through the time sequence.

1           A    Well, that's the only event or really that I -- the event at Freedom Plaza was  
2 going on all afternoon, night. Like, the only time I went over there, though, was to walk  
3 Navarro over and then, I think, to like give Ali some of his passes.

4           Q    Was that the backpack swap?

5           A    Yeah. It sounded dramatic, overly dramatic. It wasn't.

6           Q    Lots of people like to be dramatic.

7           A    I know. It's just the credentials.

8           Q    Yeah.

9           A    So the swap was he was giving me a pass to be able to come to meet him to  
10 get --

11          Q    That was the pass for January 5th or January 6th?

12          A    5th. I needed it to get to the area.

13          Q    Got it. Because he had the passes for January 5th?

14          A    Right.

15          Q    But at some point did you have his passes for January 6th?

16          A    Yes.

17          Q    Okay. Let me come back to that, because I think that was later, right?

18          A    Yeah.

19          Q    So you -- okay. So you go to the Freedom Plaza and then you come back to  
20 Trump Hotel?

21          A    Yeah. I don't know the timing if I went back to the Willard, then over to  
22 Trump Hotel.

23          Q    But the event was at Trump Hotel?

24          A    Yes.

25          Q    Okay. And just tell me about what happens there?

1           A    The purpose was, there was a lot of big donors and people that I knew had  
2    been flying in because the guidance memo basically said arrive at, like, 7 or 8 a.m., or  
3    something like that.

4           So nobody I knew was coming in that morning. They were all coming in the night  
5    before. And so I thought it would be nice to organize an event to, first of all, watch the  
6    Georgia election results that night, and then also, because of the COVID restrictions, their  
7    restaurants and indoor dining wasn't open, so just to have food and, like, a place for  
8    people to gather and then watch the results together.

9           And then I ended up adding in some VIPs to come and get -- like, just speak to the  
10   group.

11          Q    And was that -- I think you had Adam Piper come speak?

12          A    Yes.

13          Q    And did he speak with AG Paxton that night?

14          A    Paxton did not make it in time. His flight was delayed.

15          Q    So do you remember who spoke at the event that night other than Adam?

16          A    Tommy Tuberville, Peter Navarro, Rudy Giuliani, and Adam Piper. I think  
17   that's it.

18          Q    So Tommy Tuberville -- Tube-er-ville or Tub-er-ville?

19          A    Tub-er-ville.

20          Q    Tuberville, Adam Piper, Peter Navarro, Rudy Giuliani. Anyone else you can  
21   think of?

22          A    I had Michael Flynn on the agenda and he never showed up.

23          Q    But he did want your VIP passes --

24          A    He sent Joe Flynn down to get them. [REDACTED]

25   [REDACTED] what Joe had said, so he didn't come down. So Joe came down to get

1 their, like, family passes for the next day.

2 Q Okay. And if you -- and I'm assuming that's kind of like a regular donor  
3 event, like nothing out of the ordinary happens that you can remember?

4 A Yeah. Oh, it was very normal.

5 Q That night there's a text between you and Maggie Mulvaney, I believe --

6 A Yeah.

7 Q -- exhibit 55, where I think it's maybe a couple pages in.

8 A Okay.

9 Q Actually, maybe closer to the end. Yeah. Oh, nope, 846. Yeah, 846.

10 A Okay.

11 Q You ask her, "Do you have your laptop?"

12 "Yes, but it's dead."

13 So sometime before 9:43 p.m. but after 6:56 she says, "Get up here.

14 Emergency."

15 And you say, "OMG. Really?" And you say, "Help."

16 And she says, "With?"

17 And then you say, "Do not give anyone the red credentials."

18 It's like very dramatic.

19 So what is the emergency that you needed to get up there for?

20 A So Peter Navarro had a -- like a Skype interview with like Newsmax or  
21 something like that, let's say. The room that we did the event on that night was in the  
22 Trump townhouse. It had an upstairs and downstairs.

23 So Navarro wanted to come over to our event, but he also needed to do his  
24 Newsmax event. So I was asking her for help to go set up her laptop upstairs so he  
25 could do this, like, event.

1           And then her laptop, like, was dead and couldn't. So the emergency was, like,  
2 she -- the hit was about to have to happen and, like, she couldn't figure out her laptop  
3 and get it -- so could I bring up my laptop, which --

4           Q    The battery was about to die?

5           A    I don't remember what the, like, resolution was to the Newsmax Navarro  
6 emergency, but that's what it was.

7           Q    And so at 9:43 p.m. you say, "Help."

8           And she says, "With?"

9           What is that pertaining to?

10          A    The screenshot of this was do not give out the red credentials, that's the  
11 next day. So help would have been -- there were several times that evening where I got  
12 trapped talking to donors about election integrity things and it was sort of SOS. It would  
13 have been I was, like, trapped talking to someone and so come tap me and, like, get me  
14 out of this conversation.

15          Q    Okay. So that's kind of like, "Help," and she's like, "With?" Okay.

16          A    I think I also texted Kim something similar to that, like "Help, emergency."  
17 We do that often.

18          Q    The tone doesn't translate in the transcript, but you need, like, tone to  
19 understand the text?

20          A    Right. So there were no big emergencies or things you need help with.

21          Q    And the next morning, on January 6th at 5:01 a.m., you tell her, "Do not give  
22 anyone the red credentials."

23          What are the red credentials?

24          A    I don't remember.

25          Q    Are those like VIP passes? Is that something that like --

1           A    There were three colors.  There was VVIP, VVIP, and VIP.  One of the  
2 colors meant that they would have a seat like with their name on it.  That would've been  
3 VVIP.  And I don't know the colors.  That's why I have no idea what red was.

4           Q    But they would have been some kind of, like, V or VV or VVIP pass?

5           A    Yeah, that's how I coded it, but then it would've been corresponding to a  
6 color.  The VIP passes didn't say VVIP.  It would have been like red or green.  But I  
7 don't remember which one was the color.

8                    So red could have meant a couple things.  It could have meant, like, stop, we're  
9 out of reserve C.  I don't know the section.  I don't remember.

10                   Or it may have been that like oftentimes they'll order four colors, even though I  
11 only need three, and in the event like a section pops up that becomes different.  So it  
12 may have just been, like, pull the red credentials, nobody is red this time.

13           Q    Okay.  So do me a -- and why would you have told her do not give anyone  
14 the red credentials?

15           A    I don't remember.

16           Q    Okay.

17           A    Could have been a number of things.

18           Q    So do me a favor.  Flip to 57, exhibit 57, and look at 886.

19                    Mr. Kanters.  I was showing her the proof sheet of the VIP passes so she could  
20 see what the color coding was.

21                    BY ██████████:

22           Q    Was it V?  Was it VV?

23           A    Well, no.  It said speaker.  So I think that was the reason why, like, don't  
24 give anyone a speaker pass if they're checking in.

25           Q    Does that mean -- wait.  So if you have the speaker pass, does that mean

1 you could like give that to somebody and they'd be anointed to walk up on the stage and  
2 speak? Was it that kind of a pass?

3 A No, because you couldn't go past the barricades without an "S" pin on.

4 Q Okay.

5 A But still, like, we didn't -- I don't think we ever used the red -- well, the  
6 red -- I don't know. Honestly, the morning of the 6th, like, I don't know who was  
7 scheduled to speak.

8 Q Was there a special speaker area that they could get into with that?

9 A No, there's just a barricade.

10 Q Okay. Was it largely ceremonial then?

11 A Yeah. I probably said don't give out the red because they would just be  
12 wearing a speaker badge.

13 Q So on -- in exhibit 57, starting on 886.

14 A Okay.

15 Q Yeah.

16 A Yeah.

17 Q There is a conversation that starts with you and Ms. Pierson at 7:14 a.m. on  
18 January 6th?

19 A Right.

20 Q And she says, "I'm pulling her credentials, having security take her people  
21 out."

22 Who is she talking about?

23 A I got the sense that she accidently texted that to me.

24 Q Oh.

25 A And it was in reference to me.

1 Q To you?

2 A Yeah. I think. Otherwise, this whole thread I don't understand, so --

3 Q Okay.

4 A But, yeah, I got the sense that she -- that probably wasn't meant for me.

5 Q So when she keeps talking, "This ends now. So ridiculous. I gave up  
6 permits for you. I helped you and helped your fucking people get stages, buses, and  
7 everything. Punishing other people because of the White House decision was a  
8 mistake," what do you think she meant by that?

9 A Did you read my response?

10 Q "I'd hardly say you helped my people."

11 A No. I said, "I don't know what you're talking about."

12 Q No, no. I thought you were saying that in response to, "This ends now.  
13 So ridiculous." But when she says, "I helped you and helped your people get stages,  
14 buses, and everything. Punishing other people because of the White House decision  
15 was a mistake," you say, "I'd hardly say you helped my people."

16 Who was the "my people" there?

17 A I don't know. I think I was just -- that was the one thing to write a  
18 short -- like, I'm busy working the event and seating, different things, and I -- she starts  
19 going on about this.

20 I don't understand what she's talking about, starting with, "I gave up permits for  
21 you." I don't know what that means. The permits were in the Kremers' name, so I  
22 don't know what permits she's talking about.

23 I helped you -- partially true -- and helped your people get stages -- I don't know  
24 what that means -- and buses -- maybe she helped with that.

25 So breaking down this, I didn't know what she was talking about, so for some



1 reason I pulled out one of these things, just saying, "I'd hardly say you helped."

2 Q Well --

3 [REDACTED]. You had an understanding of what you meant by your -- you said  
4 "my people." So who -- What did you mean when you said that?

5 The Witness. At this point the only people I thought going on stage were Kylie  
6 Kremer, Amy Kremer, Katrina Pierson, the President, and maybe Don or Eric for  
7 3 minutes. And then I did think Kim was going to end up going on stage.

8 So I'm saying, "I'd hardly say you helped my people," that doesn't -- like the  
9 Kremers aren't my people.

10 [REDACTED]. Right. So she hardly helped your people. Who is "my people"?

11 The Witness. I think what's she's saying -- she's implying -- the only thing I read  
12 in this reply was the Kremers, and, like, I'd hardly say the Kremers are my people.

13 BY [REDACTED]

14 Q She says, "I helped you and helped your f'ing people get stages, buses, and  
15 everything."

16 And you say, "I'd hardly say you helped my people."

17 A Right.

18 Q Which people are you -- she says your people, you say my people. Which  
19 people are we talking about?

20 A She's saying, I helped your people get stages. I interpret that is, I helped  
21 your people, like, get on to the stage, right?

22 Q Right, but they didn't get on on Jan 6th --

23 A That's why this doesn't make sense. The only people that did was, at this  
24 point, like the -- so that's where I'm being -- meaning it was sarcasm. Meaning, like, "I'd  
25 hardly say you helped my people," basically like the only people you got on stage were

1 yourself and the Kremers, so that's hardly my people.

2 Mr. Parrish. Like "my" people. You hardly helped "my" people because the  
3 Kremers aren't "my" people, they're "your" people.

4 [REDACTED]. That's exactly right. So who are your people that you're saying  
5 that back to?

6 The Witness. She said I helped you and helped your people. I'm saying, "I'd  
7 hardly say you helped my people," because the Kremers weren't my people.

8 [REDACTED]. But you think that she's referring to the Kremers with this?

9 The Witness. There's only -- well, at that time, the only people -- she said, I  
10 helped your people get stages, which I'm assuming that means get on stage, right?

11 [REDACTED]. Right.

12 The Witness. So the only people at this point, at that time this morning, that we  
13 thought were getting on to the stage were Katrina Pierson, Kylie Kremer, Amy Kremer,  
14 the President.

15 [REDACTED]. And the people who get stages, buses, and everything else, the  
16 people who get stages but don't speak on January 6th, the people who got assistance  
17 with buses because you set them up with Turning Point, the people who got stages,  
18 buses, and everything, but didn't get helped on to the stage on January 6th was who?

19 Mr. Parrish. Objection, form.

20 The Witness. Everyone on planet Earth that didn't take the stage on January 6th.

21 BY [REDACTED]:

22 Q No, there were not actually --

23 A Like I'm saying --

24 Q -- there were not a lot of people who qualified.

25 A She said, I helped your people get stages. She's saying, I helped your

1 people get on stage.

2 Q Who got on stage that was your person?

3 A Exactly. No one.

4 [REDACTED]. But that's not what she says. She says stages, plural. And there  
5 were several events between the night of the 5th --

6 The Witness. Right.

7 [REDACTED]. -- and on the 6th, right?

8 The Witness. I didn't need her help -- well, that still also doesn't make sense.

9 Like, I didn't -- I couldn't have cared less who spoke on the 5th and what stages.

10 [REDACTED]. But your -- people that you had been advocating for, like Ali  
11 Alexander, got to speak on the 5th, right?

12 Mr. Parrish. Objection, form?

13 The Witness. Yeah.

14 [REDACTED]. Did he -- did Ali Alexander speak on the night of the 5th at the  
15 Freedom Plaza?

16 The Witness. Yes.

17 [REDACTED]. Okay. Alex Jones spoke on the night of January 5th at Freedom  
18 Plaza?

19 The Witness. Yes.

20 [REDACTED]. Okay.

21 [REDACTED]. Roger Stone?

22 BY [REDACTED]:

23 Q Roger Stone also spoke the night of the 5th at Freedom Plaza?

24 A Are you implying these are my people?

25 Q I'm asking. Did he speak that night?

1           A    I have no idea. I've never, like, talked to Roger Stone.

2           Q    You don't know if he spoke that night, on the 5th?

3           A    I would assume that he did, but I never saw final speaker show or his speech.

4           Q    And so when you say "my people," you're saying that you're talking about  
5 the Kremers in your response?

6           A    I'm saying: I don't understand what you're saying because you're saying  
7 you helped my people get on stage and the only people on stage were the Kremers and  
8 Katrina. And then, like, the fact that she didn't help with any of my people because I  
9 don't consider the Kremers to be my people.

10          Q    Her response to you, though, is, "I told you to call POTUS." Do you see  
11 that?

12          A    Yes.

13          Q    Right. So when she had told you to call POTUS was about the speakers,  
14 right?

15          A    Again, we can go through -- none of this made any sense. If we're going to  
16 go through it line by line, I want to go through it line by line.

17                What do you think she meant when she said, "I gave up permits for you".

18          Q    So the facts are -- I'm not answering your question -- but factually, I'll  
19 represent to you that, in fact, Women For America First had the permit for the Freedom  
20 Plaza and so had to agree to give it up for Cindy Chafian to be able to hold her event and  
21 allow people like Roger Stone, Alex Jones, and Ali Alexander to speak. That is factually  
22 true.

23          A    Well, they moved it to the pastor's, not to Cindy Chafian.

24          Q    That's actually not what happened. It ended up being in Cindy Chafian's  
25 name. I understand that you don't know that.

1 A Oh, really?

2 Q But, actually, this is true. She released the permit so the event could  
3 happen on January 5th at Freedom Plaza so that Cindy could speak and have all these  
4 other folks talk. That's actually what happened. So you asked me, that's what she's  
5 talking about.

6 A I mean, we can keep debating the "my people." I read the "my people" as  
7 the Kremers, and I don't view them as my people. And this is what I wrote.

8 Mr. Rowley. [REDACTED], why don't you ask her, is Roger Stone one of her people? Is  
9 Ali Alexander one of her people? Is Alex Jones one of her people?

10 [REDACTED]. I think you already said Roger Stone is not.

11 The Witness. Well, I don't know. I met Alex Jones that morning. Like, Ali I  
12 met the afternoon. So like define -- it was the Kremers versus everyone. So, basically,  
13 I don't know what you're asking me.

14 BY [REDACTED]:

15 Q You met Ali Alexander that morning that you had --

16 A I met him on the 5th.

17 Q On the 5th, but you had literally just spent -- I mean, I could count the so  
18 many texts that you guys -- of everybody in here, the two people who have the most  
19 cordial, friendly, respectful text conversation that I think I've seen in the whole frickin'  
20 case, who treat each other like adults, is actually you and Mr. Alexander.

21 A Yes.

22 Q It's respectful, it's professional, it's courteous. He's helpful to you, you ask  
23 him for things, and he delivers.

24 So nobody reading this would actually think it was weird if you looked at all of the  
25 drama -- I forget how you worded it -- all of the nightmare and said, "The one person who

1 didn't make my life miserable was my people."

2 So that's what we're trying to figure out is, is taking it in a vacuum --

3 A Right.

4 Q -- you didn't have a ton of interaction with Alex Jones, but it sounded like  
5 Ms. Fancelli did like Alex Jones and wanted him there. So you said you wanted to take  
6 care of your donor.

7 There's absolutely a way to see how Ali Alexander, the one person who was nice  
8 and helpful to you, and Alex Jones, the one person that your donor was a real fan of, who  
9 you worked to try to get on the stage the entire time, never got on the stage on  
10 January 6th. And there's certainly an interpretation there of "my people" to be the two  
11 individuals that you worked really hard that at the last minute she basically said no?

12 Mr. Parrish. Okay. There's not a question pending right now.

13 The Witness. Well, I want to pull out one thing in there on Alex Jones.

14 Alex, if you notice on the speaker's list, was never -- he was on the original, that  
15 one, way early and then dropped off and wasn't. So, yeah, Alex was not someone I was  
16 advocating for hard core to speak the entire time throughout it.

17 Alex actually was also -- was very easy. He was like, "Yeah, I don't care about  
18 speaking." That was it. So he just fell off the list and never -- didn't care.

19 BY [REDACTED]:

20 Q But Ali was different, right?

21 A Yeah. He wanted to speak.

22 Q And he worked really hard to organize this, didn't he?

23 A Yeah, I'm not denying that, and I did say that, that I thought he was very nice  
24 and pleasant to deal with and not dramatic.

25 But back to this original, "I'd hardly say you helped my people," my interpretation

1 of this -- I see where you all's interpretation is -- but my interpretation was, when I was  
2 reading this, that your people get stages in this moment -- I now see where you all are  
3 coming from and it maybe is not what, like Katrina.

4 But I interpreted that to mean her saying that I helped the Kremers get on to stage  
5 and herself as my people, and I'm like that -- because that at that time is who was  
6 speaking.

7 Like, Ken Paxton wasn't speaking, Rudy -- I mean, I don't -- so "my people" could  
8 have been anyone, but like I was thinking she meant the Kremers.

9 Q Right below that you say, "If I get one more" -- excuse me -- she  
10 says -- apologies -- Ms. Pierson says, "If I get one more complaint about anyone not being  
11 able to get credentials or their seats or their VIP, I will have everyone on your team  
12 escorted off the property and that includes you. White House approved."

13 What did you think she meant by that?

14 A I quit replying. But it also made no sense. I didn't say anyone couldn't get  
15 in. And, like, I wasn't running registration that morning either.

16 Like, Women for America First had a registration desk. They made their  
17 credentials. And then my girls were sitting at a registration desk up there. I don't  
18 know what the final list system, like, actually ended up looking like, was all confirmed, but  
19 there wasn't really service.

20 So I didn't -- it's not like they had texted me and said, "Can this person come in?"  
21 and I'd be, like, no or yes. I wasn't really going through. And also those texts could  
22 have been reflected. So there's not anyone that I denied entry.

23 Q Did you get the credentials late the night of January 5th from, I think,  
24 somewhere in Virginia?

25 A I didn't go. Someone from my staff did.

1 Q Okay. And did anybody else know that you were getting them?

2 A Yeah. I'm sure others would have known that we were going to get them.  
3 I don't know if it would have been late the evening of the 5th, because I would've had to  
4 give credentials to Ali on the afternoon of the 5th.

5 Q The night of the 5th, did you invite anyone up to your room after you had  
6 gotten the credentials?

7 A I don't -- I remember Alexandra Preate walking back with me and coming up.  
8 I do know now that there was an individual, Dustin someone, who had said that he was  
9 with me the evening of the 5th. I have no memory of that. Alexandra thinks that we  
10 rode the elevator with him, but then she kind of said, well, maybe he came upstairs and  
11 came to the room because we ordered some food and had, like, a drink or something like  
12 that in the room.

13 I really don't -- don't remember. I don't remember him or -- the way the article  
14 phrased it was, like, had a meeting with. I was like, what? This is so bizarre. But I  
15 don't feel like I would've gotten home until, like, very late.

16 Q And please don't take this -- this is not asked with any sense of judgment, it's  
17 just for facts. Were you inebriated at all that night such that it would make it difficult to  
18 remember what happened?

19 A Probably.

20 Q Okay. Would Alexandra have noticed that you were inebriated?

21 A Oh, she probably would have been too.

22 Q Fair.

23 A We just lost the Senate majority, so this was a bit of a mourning time.

24 Q And when you got the credentials from Virginia, did you grab all of them or  
25 did you grab some of them?



1 A I have no idea. One of the staffers or someone went to go get them.

2 Q Okay. Do you remember when they came back if there were a lot more  
3 credentials than you thought there normally would have been?

4 A I don't know.

5 Q Or did you notice the next morning that you had a lot of credentials?

6 A I would've had all the credentials with the exception of, like, one batch that I  
7 would've given to Ali.

8 Q Oh, because you would have then brought them and divvied them up to  
9 everybody, to all the other groups?

10 A No. Everyone submitted their lists, including Ali, to pick up theirs that  
11 morning. Ali wanted a few to not, like -- to have them basically -- I think he probably  
12 just wanted it as a security blanket, which I was willing -- to have some in hand to be able  
13 to, like, give out then. They also would have been on the list.

14 And the only way to, like, come in would have been the same VIP entry point,  
15 even if you had your credential already with you. But, otherwise, like, nobody else  
16 really had their credit -- you had to just come through the VIP check-in.

17 Q On the day of January 6th -- it's a good segue -- I understand the thing with  
18 Ms. Pierson, but did somebody -- did you have any interactions with Kylie Kremer?

19 A No.

20 Q Okay. Did you have any personal interactions with Katrina Pierson other  
21 than the text? I'm talking about in person.

22 A Yeah, I think that she did, like, approach me at some point and seemed like  
23 very heated. And I don't remember what she would've confronted me about.

24 Q Did you have any -- can you describe your interactions with Ali Alexander  
25 that day?

1           A    I don't really remember any direct interaction.  He came in and I saw him  
2 working at the front thing.  I said here are your seats.  That was that day, that morning  
3 would have been.

4           Q    Did you escort him out when it was time for him to go to his event?

5           A    Yeah, because he was going to go with Alex.  Roger Stone didn't show up.  
6 And so I asked Alex who, like, is there anyone else he'd want to, like, walk with, march  
7 with, whatever you want to call it, to go down to their event since Roger didn't show up.

8           And he said, "Yeah, Michael Flynn."

9           And I asked Michael Flynn, and he said, "Hell, no.  It's freezing."

10          And so then I said, "What about Ali, since he's going to the same stage?"

11          And Alex said, "Okay.  Whatever."

12          Q    And I think you just said a minute ago, so you never saw Roger Stone on  
13 January 6th because he didn't show up?

14          A    Yeah.  I don't think he showed up.  I don't remember seeing him.

15          Q    Did you have any conversations -- other than the text messages that you  
16 provided, did you have any phone calls with Julie Fancelli?

17          Mr. Rowley.  On the 6th?

18                BY ██████████:

19          Q    On the 6th.

20          A    I would think -- I think I would've, like, called her to check in after all this, but  
21 I'm not sure.

22          Q    She sends you three texts that day asking when Roger speaks and when Alex  
23 is going to speak.

24          A    Right.

25          Q    Did you have any conversations at all that day?  Was she surprised that

1 they weren't speaking?

2 A No. Where would that be?

3 Q Exhibit 70, specifically 435, assuming it's the right one. Some of these have  
4 been off for some reason.

5 A Uh-huh.

6 Q Yeah. Bottom of 435, she said, "Hey, are you in the middle of it all? Does  
7 Roger speak this afternoon?"

8 You said, "It's incredible."

9 She said, "How many people? Where is Roger?"

10 You said, "Hundreds of thousands. I'm backstage. POTUS is about to go up.  
11 He is so happy."

12 She says, "Where are the buses with all of Charlie Kirk's youth? Where does  
13 Roger speak?" There's a little bit of a common theme there.

14 So I was just surprised. After Julie's asks, is she a little heartbroken that Roger  
15 never speaks on January 6th?

16 A I think probably. But I -- you have to understand Julie, she doesn't -- she's  
17 like the nicest person ever. So she's just asking that to be nice. And I don't -- she  
18 doesn't know Roger.

19 I think at one point she had asked me for his number and she may have called  
20 him. I have no idea if they actually spoke on the phone.

21 But she obviously, like, really likes him, but it's not because they're, like, sitting  
22 and coordinating with one another and talking, right, like I don't --

23 Q Is it more like a fan?

24 A Yeah.

25 Q And can you tell us the interactions you had with -- you mention it here, that

1 you're actually backstage, "POTUS is about to go up. He's so happy." Did you actually  
2 talk with him that day?

3 A No, but that was when the infamous, like, dancing video was happening.

4 [REDACTED]. With Ms. Guilfoyle?

5 The Witness. I think it was Don that recorded it.

6 [REDACTED]. I meant of Ms. Guilfoyle dancing.

7 The Witness. I think there, like, were multiple people. So it was a joyous time  
8 backstage at that time.

9 [REDACTED]. In the tent, right? Like the shimmying in the tent thing?

10 The Witness. And Gloria.

11 [REDACTED]. Okay. It's coming back to me.

12 The Witness. So it was during that time. Like he -- others seemed happy.

13 Mr. Rowley. There you go.

14 [REDACTED]. Yeah. The humor creeps out. It's Friday night for John already.

15 But that's a helpful timeline in terms of like picturing the tent and the dance video.

16 BY [REDACTED]:

17 Q So you didn't actually get to talk to the President at all?

18 A No. Huh-uh.

19 Q But did he look happy then?

20 A Yeah. I think they were looking at photos of the crowd and it was a very  
21 big crowd. So --

22 Q I have been told that makes him very excited.

23 A Yes. He likes big crowds.

24 Q Okay. And in terms of members of the Trump family, did you get a chance  
25 to spend time with Don and Kimberly?

1 A Yeah.

2 Q Were you hanging out in the tent?

3 A Yes, because they arrived much earlier than the President. There was a  
4 separate tent. So for at least an hour, maybe even longer than that, they were hanging  
5 out in, like, a separate tent that was sort of a speakers hub tent that had coffee and  
6 things.

7 Q Did you get the impression from any of the family members or anyone in the  
8 tent that anyone was intending to go to the Capitol after the rally was done?

9 A Absolutely not.

10 Q Okay. Did you get the impression from the people outside that some of  
11 those people were intending to go to the Capitol after the rally, either in the VIP -- were  
12 you ever in the general attendee area or did you stay in the VIP area?

13 A I was in the VIP most of the time. And so nobody I knew was going outside  
14 of, like, all the speakers who were set to speak there.

15 And then I was -- I invited several of the VIPs to come to the Trump townhouse to  
16 watch the certification of the electoral college and was going to have, like, you know,  
17 catering and some drinks and stuff. And so a few trickled over there, but otherwise I  
18 didn't get the sense of like too many people were going.

19 Q And when you left -- because I think I remember seeing -- I think I remember  
20 you saying from your informal interview you were, like, cold or you were going back to  
21 the hotel or something?

22 A Yeah. I went to the Willard to change my socks.

23 Q Socks. Totally empathize.

24 When you were leaving, was it before or at the same time that other people were  
25 leaving? Were there still, like, people there?

1           Let me rephrase it. Was his speech done?

2           A    His speech was done, yes.

3           Q    His speech was done. And so he had said, "Let's all march to the  
4 Capitol" -- I'm paraphrasing. Were you going against the tide of people as you went to  
5 the Willard and they went towards the Capitol?

6           A    No. When he said that, I missed it. That was when I was walking Alex and  
7 Ali like over to the perimeter and we stopped by the bathroom.

8           And so someone -- I remember someone saying, "Did he just say that he's  
9 marching?"

10          I'm like, "No, there's no way. Like, you didn't hear that correctly." And -- but I  
11 said, "When I get back, I'll let you know."

12          And then once they had left and, like, we got -- I went back and he was still talking.  
13 So, like, I think he said that. And it went on for a little bit, and also he waves and there's  
14 music.

15          And so I asked someone, I said, "Did he actually say he's going to march?"

16          And they said, "Yes."

17          And I said, "That's not actually happening, right?"

18          They're, like, "No. There's no way that could happen."

19          And so I -- that's when I texted -- they said, "Is he marching?"

20          And I say, "No."

21          But then also, like, he said, "Let's walk down Pennsylvania." That was me  
22 confirming what did he just say, because I didn't know what he -- and I also didn't hear it  
23 in, like, live time.

24          Q    Were you there when people started to leave or did you leave first?

25          A    No. I stayed till the end and then kind of stayed afterwards for a while, but

1 I didn't get the sense that -- first of all, the -- it was kind of in a -- this was the stage and  
2 the VIP and all the people were out here. Like, it would take a while to leave VIP and to  
3 exit anyway. You're kind of, by being right up front, you're the last to leave.

4 And so I was able to cut through and leave directly. But I got the sense most  
5 people, including myself, were freezing and were going home.

6 Q Okay. So to the extent you're still in the VIP area, there's not a lot of  
7 movement because it would have been, like, the back --

8 A Right.

9 Q -- slowest end of the movement, if I understood what you were saying  
10 logistically? Okay.

11 And did you have any interactions -- well, in terms of other Trump family  
12 members? Was Tiffany even there?

13 A I don't think she was.

14 Q Okay. Just Lara, Eric, Don, Jr., and Kimberly?

15 A And Ivanka.

16 Q And Ivanka. Was Kushner there?

17 A No. He was in the Middle East.

18 Q And did you have any interactions with Rudy Giuliani that day?

19 A Yes.

20 Q And what did you guys talk about?

21 A I got a text from his assistant at 10:05 a.m. saying the President just called  
22 him and wants him to speak, can you get a car for him?

23 Q Who is that person in your texts?

24 A Christianne.

25 Q Christianne?

1 A Christine, Christianne.

2 Mr. Rowley. She's in there.

3 The Witness. Yeah. She's in the documents.

4 [REDACTED]. Is she saved as Christianne or is she just a phone number?

5 The Witness. Christianne Allen.

6 Mr. Kanters. Christianne Allen. Christianne (ph) with an "l" and an accent over  
7 the "e," beginning Bates No. 537.

8 [REDACTED]. Okay. And so then when you said -- you said a minute ago -- and I'm  
9 sorry, you said -- your conversation with Mr. Giuliani, he said he needed to --

10 The Witness. So Rudy was not planning to even come, since he wasn't speaking,  
11 [inaudible] I didn't get the sense he was even going to come over to the event that day.

12 Then at --

13 Mr. Kanters. Here it is. The exact line is at 549, bottom of the text.

14 [REDACTED]. Can you see the time on that?

15 Mr. Kanters. It is 10:07 on the 6th.

16 [REDACTED]. In the morning?

17 Mr. Kanters. Yes.

18 The Witness. "Hello. Just wanted to double check that they're in and  
19 everything is okay, question mark. POTUS called Rudy and said he wanted him to speak.

20 And then sent me Alvaro's (ph) contact information."

21 So that was difficult logistically to figure out.

22 BY [REDACTED]:

23 Q And did you arrange that for him?

24 A Yes. Well, the driver -- they didn't want to walk from the Willard, so I had  
25 to figure out a way to get their car manifested to like, basically, the White House. And



1 he came over with Eastman.

2 And so I had to deal with that driver and then someone from, like, operations or  
3 logistics to basically be able to allow them to drive -- to like to be dropped off right at the  
4 White House Ellipse. So there was a lot of coordination regarding that. But I didn't  
5 really talk to Rudy outside a driver and assistant.

6 And then Rudy got out of the car and I felt like someone would've walked him  
7 over to hold and then he just went up on stage with Eastman.

8 Q Did you have any interactions with members of the President's Cabinet?

9 A You'd have to ask me a person.

10 Q Okay. I'd have to know any of them.

11 A I don't.

12 [REDACTED]. [REDACTED]?

13 [REDACTED]. No.

14 The Witness. Is Navarro a Cabinet member? Yeah. So --

15 [REDACTED]. This is clearly a research assignment for us, note to self.

16 [Laughter.]

17 BY [REDACTED]:

18 Q In terms of Members of Congress, did you talk to anyone -- Ms. Greene, Mr.  
19 Gosar? Did you have any interactions with anyone that day?

20 A Not that I recall.

21 Q Outside of the text messages you produced?

22 A I didn't text with any Members -- oh, I guess I texted Tuberville the one time,  
23 that was it.

24 But, like, I can't -- I may have seen Madison and been like, "Oh, this is where the  
25 wheelchair ramp is, let me help you," or something. But I didn't have any conversations

1 of substance and I didn't know who was coming that day.

2 Q Did you have interactions with Attorney General Ken Paxton or his staff --

3 A Yes.

4 Q -- that day? What interactions?

5 A His assistant was very upset because he was told that morning that he  
6 wasn't speaking.

7 Q By whom?

8 A Probably Katrina.

9 Q Who would've told her to tell -- to the extent that you know, do you know  
10 who would've told her to tell him that?

11 A No.

12 Q Okay. But he did end up speaking.

13 A Yes.

14 Q Do you know how that happened?

15 A Probably similar to, like, Rudy. Like, it gets -- typically with these, as I  
16 mentioned earlier, this, like, just because a decision's made about speaking, like, it  
17 changes often even in the last 24 hours.

18 So someone, and I'm not positive who, but probably would have alerted someone  
19 who was with the President and said, "Ken Paxton's down there, would you like him to go  
20 up?" And then the answer was clearly yes, because then Ken Paxton went on stage.  
21 And there was, I think, a number of people like that that day.

22 Q When you were there at the rally, what happened when the Park Service  
23 ranger came over to try to escort you out?

24 Mr. Parrish. Objection, form.

25 The Witness. Yeah.

1           Mr. Parrish. Came over to talk to her?

2           BY [REDACTED]:

3           Q     Oh, I thought for some reason I saw something where -- I thought this was  
4 actually maybe something you told us last time, so I definitely don't want to  
5 mischaracterize it.

6           What was the interaction you had with a Park Service ranger?

7           A     I didn't know what he was with, whether or not he was a Secret Service or  
8 National Park Service person or a police officer. He was dressed in a uniform and he  
9 tapped me and said, you know, "Excuse me, are you Ms. Wren?"

10          I said, "Yes."

11          And he said, "Can we talk over here," and kind of pulled me over to the side close  
12 because I was doing seating.

13          He said, "The permit holder would like to have you removed."

14          And I just kind of thought, "What?"

15          And this individual had been standing there watching. He was -- he was  
16 stationed, like, right in the place where I had been working for probably a couple of hours  
17 and he said -- I'd have to remember. Said something like, "Well, there's, you know, she's  
18 complaining about a disruption."

19          I said, "I don't know what you're talking about. What disruption? And, sir, like  
20 I've been -- you've been watching me all morning, have you seen any disruption?"

21          And he kind of said, "No."

22          And then he walked away, he said, "Hang on. Let me call someone." And he  
23 walked away and I stood there for probably a minute or two and he came back and said,  
24 "You're fine," and walked away.

25          Q     The Women for America First, like Kylie Kremer, I think, especially multiple

1 times in texts and emails, she says, "Oh, there's no march on our permit, so we can't talk  
2 about marching." But we've talked a lot about the places where people are talking  
3 about marching.

4 And if you look at exhibit 53, there's an email from Mr. Budowich on 745. And  
5 this would have been right before January 1st, so maybe on December 31st, based on the  
6 timing.

7 He says, "Changing to RSVP to the March to Save America. POTUS needs to end  
8 his speech by saying something like, 'Now go march on the Capitol, march to save  
9 America."

10 Do you know what he's talking about there?

1

2 [6:15 p.m.]

3 The Witness. I'll address the first part of your -- something in your question.  
4 You said that Kylie was texting a lot of people saying, "We can't be saying a march."

5 BY [REDACTED]:

6 Q I was just kind of paraphrasing. There were, like, a number of emails and  
7 texts where she would kind of -- I don't want to say panic, but she would get concerned  
8 when people talked about marching and say, "Our permit says no marching," or  
9 something. Do you remember what I'm talking about?

10 A I don't think I'm copied on any of that.

11 Q Oh, okay. Would you have been surprised --

12 A Yeah.

13 Q -- if she said that?

14 A Yeah.

15 Q Okay. And Taylor Budowich here, when he says, "The President should say,  
16 'Now go march on the Capitol, march to save America,'" I guess we are at, like, this is now  
17 December 31st.

18 A Right.

19 Q And it was going to kind of, like, it seems like everybody's operating on that  
20 there's going to be a march.

21 A Correct.

22 Q It's just a question of does he tell us to or is it just kind -- does he tell us to or  
23 not?

24 A Right.

25 Q Okay. When he said that, did you think there was a chance that the

1 President would actually say that at the end of his speech?

2 A Yeah.

3 Q Yeah? Because I thought earlier you said you were really surprised when  
4 you were standing there and he said it.

5 A I was, because there was never any, like, confirmation. And really, like, this  
6 was the only time it's mentioned. But when he said it, it didn't seem like -- I mean, there  
7 was no, like, follow-up that I did with anyone on behalf of that. He's just saying it and it  
8 didn't seem like something crazy at the time, because we were still operating under this  
9 time like there was probably going to be some sort of march.

10 Q And I understand you did not go to the Capitol. You left and went back to  
11 the Willard?

12 A Willard to change socks and [inaudible].

13 Q Right. And how much longer did you stay in D.C. following the events on  
14 January 6th?

15 I mean, I don't need the exact, like, minute. I'm just trying to gauge did you  
16 leave that day, did you stay that night, leave the next morning?

17 A Oh, yeah. I, like, traveled a few days, so, yes.

18 Q After the incidents on January 6th, what communications did you have, if  
19 any, with Roger Stone?

20 A Zero.

21 Q And what about Alex Jones?

22 A Sorry. After --

23 Q Yeah, after --

24 A After the day of January 6th?

25 Q Uh-huh.

1 A Alex Jones, you know what his number is?

2 Q Oh, his exhibit number?

3 A Uh-huh.

4 Q I don't. Your texts with him and email may not even be in here actually. I  
5 don't know that they are. You may have to -- Micah may have to pull them up.

6 A See, it says Sunday.

7 Q Can you --

8 A I don't know what Sunday that is.

9 Q Can you read the Bates number on the bottom?

10 A Yes. Oh, no.

11 Mr. Kanters. Hers is not Bates stamped.

12 The Witness. Yeah.

13 So the way I did it was like a screenshot. So it just says Sunday at 11:32 a.m. I  
14 don't know what Sunday that would have been. So it could have been, like, the  
15 immediate Sunday after the event or a couple weeks after. We can -- I'm happy to look  
16 and tell you.

17 But he asked how I'm doing, I never talked to you. And I didn't respond. And  
18 then he sent me a, like, a link to something.

19 And then I spoke to him sometime that evening. He called me to check -- he  
20 called to check in and said -- he asked for Julie's number, which is why I sent it to him,  
21 because again, like, they didn't really talk. People didn't understand that, like -- so --

22 Q Do you know if he called her, if you know?

23 A I don't. I would assume that he did, since he asked for her number. I  
24 don't know if she answered or what. Yeah.

25 Q Did you talk with Ali Alexander at any point after January 6th?

1 A Yes. He sent an email that seemed to me like it was like a blast email.

2 Q His statement about January 6th?

3 A Yeah, it was like a Bcc or something like that.

4 Mr. Kanters. And the Bates number on that was 476.

5 [REDACTED]. Which one was that?

6 Mr. Kanters. With Alex Jones.

7 [REDACTED]. Got it.

8 Mr. Kanters. After the January 6th.

9 [REDACTED]. Thank you.

10 BY [REDACTED]:

11 Q Those are just the text messages?

12 A Yeah. Craig, can you take the coalition partners down? So that was sent  
13 the morning of the 7th.

14 Q Why did you ask him to take the coalition partners down?

15 A Because, like, RAGA or [inaudible] was getting calls.

16 Q Okay. Oh, that's right. There was a text with Adam and you were like, oh,  
17 I don't know who does that website. Was that --

18 A Yeah. So I did. Because there was a text with Adam, you know, prior to  
19 the 6th saying, Can you take Ali off of the website? Well, there were so many websites.  
20 I had asked Women for America First to take it down. I didn't even know it was on all,  
21 like, which website.

22 So then when he asked me that morning, I had to go look. And it was on -- I  
23 think Ali had three websites, so it was on one of those, and that was me asking for it to  
24 come down.

25 Q Did you talk to General Mike Flynn at all after January 6th?



1           A     Ninety-five percent sure, no.    Like, I just don't know if I ran into him some  
2     time at Mar-a-Largo in April or something like that.    But I don't -- that would be very  
3     highly unlikely.

4           Q     And what about Rudy Giuliani, have you seen him after the events on  
5     January 6th or talked to him?

6           A     I mean, I don't have Rudy's number, like, but I would have probably seen him  
7     at some sort of event or something.

8           Q     Any Members of Congress, Gosar, Ms. Greene, Tuberville, any of the folks  
9     that you reached out to or communicated with on the day of the rally?    Did you --

10          A     I never communicated with any of those folks, so --

11          Q     You never texted Tuberville the day of?

12          A     Tuberville was the one.    This was the day before about inviting him to come  
13     to the townhouse on the 5th and then coming over.    But I have not talked to him since.

14          Tuberville, I'd have to check.    There might have been something, like, a few  
15     months later in relation to, like, inviting him to an event or something like that.

16          Q     Uh-huh.

17          A     I would have probably worked through his scheduler.

18          Q     But you didn't -- there were texts where you could see over the course of the  
19     day that you became aware of, like, the violent incidents that were happening at the  
20     Capitol.    Did you ever text any of the Members of Congress that you knew to see if they  
21     were okay or --

22          A     I didn't really know any Members of Congress.    Like, I didn't have direct.  
23     Like Tuberville I didn't -- I'd met the night before.

24          Q     Oh.

25          A     That one.    And otherwise, like, I didn't communicate with any Members of

1 Congress.

2 Q What about Van Flein?

3 A No, he's not -- I never met him.

4 Q Oh, okay.

5 A Like I was just connected with him regarding we needed a sponsor for a bus.

6 Q Oh, yeah.

7 A Yeah. So that's what that -- with Tom. So I didn't text him to check in  
8 with him or anything. But now I interact with Members all the time, but like  
9 not -- nothing --

10 Q Yeah. And what about President Trump or -- are the only members of the  
11 Trump family that you kept in touch with after January 6th Kimberly and Don?

12 A I still talk to Tiffany from time to time.

13 Q Oh, are you friendly with her?

14 A Yeah. Oh, yeah.

15 Q Good friends?

16 A I think pretty decent friends.

17 Q Oh. I don't think I ever asked you that.

18 And what about any of the Women for America First directors, did you have any  
19 communications with them?

20 A No. We have not had any spa days or anything together.

21 [REDACTED]. There's a couple -- there's just literally a couple more questions left,  
22 unless you have anything more on January 6th.

23 BY [REDACTED]:

24 Q I apologize if I missed this. Are you aware that Alex Jones has said publicly  
25 that he was talking with the White House about leading the march from the Ellipse to the

1 Capitol?

2 A Right.

3 Q You're aware of him saying that?

4 A And that's what I was a little bit alluding to early, like, early on in this  
5 deposition, to where Ali and Alex I did see in places where they publicly would refer to,  
6 "The White House told me." And I got the sense that they meant me. And I didn't  
7 work in the White House and they knew that. But I didn't, like, go correct them after  
8 the fact. So --

9 Q All right. So to your knowledge, Alex Jones wasn't in touch with anyone  
10 actually at the White House about the events on the 6th.

11 A That I would -- to my knowledge, he was not. I would be very surprised if  
12 he was.

13 Q How about the same question as to Mr. Alexander. To your knowledge,  
14 was he in touch with anybody at the White House about the events on January 6th.

15 A To my knowledge, he was not.

16 Q How about with respect to Mr. Roger Stone? Are you aware that he said  
17 publicly recently that he got a call the morning of the 6th from Secret Service about him  
18 leading the march from the Ellipse to the Capitol? Have you heard this?

19 A No, I haven't, but that would not make sense.

20 Q All right. So understanding that, do you have any other knowledge about  
21 whether Mr. Stone was in touch with anyone at the White House or the Secret Service  
22 about the events of January 6th, to your knowledge?

23 A No.

24 Q Ms. Alexandra --

25 A Preate.

1 Q Preate. What, just summarize --

2 A Yes.

3 Q -- what, if any, involvement would you say she had with the organization of  
4 the Ellipse rally?

5 A Zero. I think I had called to convince her to take the train down and come  
6 to the event because it would be fun, and she's a friend, and she's good friends with Kim.

7 Q If there had been a -- there is a comment about someone who helped to  
8 organize the January 6th rally that you were working with, some of, quote, "Bannon's  
9 people." Do you have any idea what that could possibly mean just from --

10 A Who made that comment?

11 Q Just someone has said that, and at the time --

12 A Oh, someone said that describing me?

13 Q Yes. Do you -- just your reaction, do you know, have any idea what that  
14 could possibly mean?

15 The Witness. Please search Bannon in all my responses.

16 BY [REDACTED]:

17 Q In relation to the events of January 6th. And maybe the way to ask it is, did  
18 you have any interactions with anybody you would consider to be Steve Bannon's people  
19 regarding January 6th, other than Ms. Preate?

20 A Pria and I are just good friends. We talk all the time. So I don't recall ever  
21 asking her, like, telling her to come down and hang out. And it, like, wouldn't have  
22 anything do with Bannon.

23 There's nothing in all of my documents responsive to Bannon. Like, I had no  
24 knowledge if Bannon was even coming.

25 [REDACTED]. Are you calling -- Pria, is that Alexandra Preate?

1           The Witness.   Yes.   Sorry, I call her Pria.

2           [REDACTED].   No, no.   I just want it for consistency.

3           The Witness.   And I don't even know if Alexandra saw Bannon most of the time  
4 there.   She came over to our event at the Trump Hotel and, like, the Willard, so --

5           [REDACTED].   Is there anyone else, just pointing to you from what you know, that  
6 you -- who you consider to be within "Bannon's people," whatever that means?   If  
7 you -- just your own sense of that.

8           The Witness.   I don't know Steve Bannon.   I don't know who his people are.

9           [REDACTED].   Okay.   That's all.

10          [REDACTED].   Last couple of questions.

11                       BY [REDACTED]:

12           Q   The move from the Ellipse center -- the move over where it was off kilter and  
13 then it was moved to the middle, do you know anything about that process?

14           A   The, like, the move of --

15           Q   If you look at exhibit --

16           A   From Freedom Plaza to the Ellipse?

17           Q   No.   Look at exhibit 35.

18           A   Does it have to do with the Christmas tree?

19           Q   Possibly.   Within the Ellipse --

20           A   Yeah.   This was the Christmas tree --

21           The Reporter.   One at a time.

22           [REDACTED].   Oh, sorry.

23           There's an email in exhibit 35.   Maggie Mulvaney sends you an email 1:58 p.m.

24           This is the Save America March, slightly off center.

25           And if you flip the page, a few days earlier, December 30th at 3:08 p.m., Justin

1 emails your personal Gmail account and says, "For your awareness." And it's now  
2 centered.

3 The Witness. Can you search Christmas?

4 Mr. Kanters. I don't believe there's any discussion.

5 The Witness. Trees?

6 Mr. Kanters. I don't think they discussed that.

7 The Witness. There's something in an email with Justin I remember, or a text,  
8 where he's saying, like, there's something historic about us getting to be able to do the  
9 Ellipse that had something to do with a Christmas tree or something.

10 [REDACTED]. But do you know as you sit here?

11 The Witness. No. So, yeah. So I didn't know if maybe that's why it's moving.

12 BY [REDACTED]:

13 Q And can you flip to exhibit 18 really quickly? This is an email chain from, I  
14 think, New Year's Eve, December -- no. Actually, in the middle of the first page, on  
15 December 30th, Kylie Kremer says -- she's referring to, I think, a video they are making.

16 "Thank you, Jason. Love it. But same as last time, not a fan of the music.  
17 Something more battlesque or another upbeat option."

18 In the text that you provided last night, which is in exhibit 80, I believe, and I think  
19 there's a Bates number, this is on also I think December 31st, 9:20, Kylie says, "This was  
20 the original for the tour leading to the 12th and we changed to more battle music."

21 Was there any discussion about tone in this in terms of, like, the risk of, you know,  
22 50,000 people riled up with battle music promos? Like, do you remember ever  
23 discussing them?

24 A I don't remember, but I do think this is important to note as to who was  
25 writing this and to why I wouldn't take seriously emails or texts later on regarding being

1 worried about Ali or his disclaimers versus whom I was dealing with here.

2 Q And I don't want to put words in your mouth, but it sounds like you're  
3 saying, because they would have done the exact same thing if, you know, like -- like, their  
4 problem was that he got more attention.

5 A Right.

6 Q It wasn't --

7 A It wasn't about -- it wasn't about the potential of violence ever.

8 The Reporter. One at a time, please.

9 [REDACTED]. No, no. She's the important one, so just say what you said again.

10 The Witness. The concern was never about the potential of violence, it was  
11 personal in nature. But I don't -- I don't remember reading battlesque here.

12 BY [REDACTED]:

13 Q And on January 12th you were paid \$1,280 for finance consulting from  
14 Reinventing a New Direction PAC. Was that just a new fundraising gig? Was that  
15 something separate?

16 A That was Rand Paul. And that was from work I did for him like a year and a  
17 half ago. I don't know why I hadn't been paid yet. But it was from work that would  
18 have been in, like, 2019 or 2020.

19 Q Okay. And we ask this just because it's relevant to the facts, it's not meant  
20 to be, you know.

21 Right after January 6th, you sent four wires to somebody named Carol Wren,  
22 possibly your mom?

23 A Yeah.

24 Q For a total of \$100,000, on four consecutive dates starting on January 6th.

25 A Yep.

1 Q What was that in relation to?

2 A I'd have to ask her, but my -- when I send money to my savings account it  
3 says Carol Wren. Her name is my savings account. And she was paying -- so I -- she  
4 needed to pay taxes at that time. So I think that was in relation.

5 But I've always, like -- or else my mom's stolen a lot of money from me. I know  
6 I'm not supposed to make jokes with this.

7 Mr. Parrish. Don't make jokes on the record.

8 The Witness. I know. Darn it.

9 But it appears that way because my savings account is in the name Carol Wren,  
10 because my mom does my banking.

11 BY [REDACTED]:

12 Q Because there were wires on the 6th, the 7th, the 11th, and February 1st.

13 A Right.

14 Q And that was all funds for your mom for taxes?

15 A No. It would have been moving money. I don't like just to keep a bunch  
16 of cash in my debit account. It would -- Carol Wren is my savings account.

17 Q Okay.

18 A We have the same name, so it's confusing. Right.

19 Q Your --

20 A Like so I'm Caroline, my mom's Carol, but she set up my account. So, like, I  
21 have a savings account, which is where she, like -- so I don't usually, like, have a bunch of  
22 cash sitting in my LLC. She moves it. She runs my financing. So she will move it out  
23 of there into my savings account, which when that transfer happens it's under the name  
24 Carol Wren.

25 Q On January 7th, Ms. Fancelli asked you, I think in exhibit 20 or tab, she says,



1 "Now what do we do? Have you spoken to A?"

2 Is she talking about Alex Jones?

3 A Correct.

4 Q And did you answer her?

5 No? Okay.

6 Mr. Rowley. You have to answer out loud.

7 The Witness. I'm sure I would have --

8 Mr. Rowley. You can't --

9 The Witness. Oh, no. Yes. No.

10 [REDACTED]. And, since January 6th, have you been contacted by law enforcement,  
11 whether State or Federal, regarding the events in D.C. on that day?

12 The Witness. No.

13 [REDACTED]. Okay. Have you spoken with Julie Fancelli, Women for America First,  
14 Ali Alexander, Alex Jones, Roger Stone, Michael Flynn? Have you spoken with anyone  
15 about -- following your subpoena from the select committee?

16 The Witness. Can you go through the names again?

17 Mr. Parrish. Objection to form.

18 [REDACTED]. Did I say "anyone"?

19 Mr. Parrish. Yeah.

20 [REDACTED]. I'm so sorry. Apologies. It's a long day.

21 BY [REDACTED]:

22 Q The individuals that I named: Julie Fancelli, Women for --

23 A Can you go one by one? So Julie?

24 Q Uh-huh. Julie Fancelli, did you -- have you spoken with her following your  
25 subpoena from the select committee?

1 A No.

2 Q How about -- I don't think you've spoken with the Women for America First.  
3 How about Ali Alexander?

4 A Yes.

5 Q And, other than that email that you mentioned, have you spoken with him  
6 since you got your subpoena?

7 A Yes. We talked on the phone one time early on in that process. And then  
8 we talked when he called me to say that he was -- he had received a subpoena, and he  
9 was going to be complying, and my name was going to be in his response of documents.  
10 I said: Thank you. That's very nice for you to let me know. The same here.

11 Then I texted him the morning of his deposition and said: Good luck. I will be  
12 praying for you.

13 And he said: Thank you. That was very nice of you.

14 And then he texted me this morning and said that, you know: I saw you're doing  
15 this. I'm praying for you.

16 Q Would you say you're friends?

17 A Yeah. I mean, I -- you know the full scope of when I met him until now.  
18 And then we've spoken very little since that day. But I -- my interactions with Ali have  
19 always been very kind and pleasant.

20 Q And what about Alex Jones? Have you spoken with him since you got your  
21 subpoena?

22 A No.

23 Q Roger Stone?

24 A No. Well, yes. I saw him on -- 2 weeks ago at an event at Mar-a-Lago.  
25 And he walked by. I said: Hello. I'm Caroline Wren.

1           And he kind of just looked at me confused and walked away.

2           Q    Michael Flynn?

3           A    I -- that was what I said, I don't think so.

4           Q    Okay.

5           BY [REDACTED]:

6           Q    This is it for me.   Charlie Kirk, did you ever ask him to speak at the Ellipse  
7 rally?

8           A    Yes.

9           Q    And what was his reaction to that?

10          A    No.

11          Q    Why?   Did he explain to you?

12          A    He doesn't like the -- Charlie doesn't speak at any events that aren't Turning  
13 Point events for the most part.   But I think he didn't really have a relationship with much  
14 of these players.   And, at that time, he'd started his podcast.   And he was doing his  
15 whole podcast live and didn't -- but he -- he didn't want to speak.

16          Q    Did he express my reservations about some of the people who had been  
17 discussed about speaking as well on that day?

18          A    I think this -- all -- this was not really a group that is a group that Charlie is  
19 necessarily close with or does a lot of events with.   Probably some overlap.

20          Q    But, again -- and I hear you on that -- did he express reservations about  
21 some of the folks, some of the people, about being associated with them?

22          A    I think, in our initial conversation, he was -- he'd had heard of or knew about,  
23 like, the past couple ones so he thought this was probably some, like, small-scale event.  
24 So I think he was a little bit surprised when it was that -- it was likely that the President  
25 would be speaking.   This was before he knew details of, oh, now, well, there's a team

1 coming in, and so --

2 Q Okay. Did he ever express reservation about sharing the stage with, say,  
3 for instance, Ali Alexander?

4 A No.

5 Q Anybody else that was a potential speaker?

6 A No. But he -- he immediately said no to speaking so, like, it wasn't: I'm  
7 nervous to be sharing a stage with X, X, or X.

8 Like, he just wasn't going to come to D.C. that day.

9 [REDACTED]. Did he even ask who else was speaking before he declined?

10 The Witness. No. Well, I had no idea who was speaking at that point, other  
11 than the hundred people who said they were speaking.

12 [REDACTED]. Would you give us just like one second just to double-check?

13 Mr. Rowley. Yes.

14 The Witness. Are we off the record?

15 [REDACTED]. We can be.

16 [Discussion off the record.]

17 BY [REDACTED]:

18 Q So, just for the record, Ms. Wren, I'm holding what are four pieces of paper  
19 that your attorney, Mr. Rowley, just handed us. Is that right?

20 A Yes.

21 Q And these are tweets that you printed out and wanted to give us, the staff of  
22 the select committee?

23 A Yes.

24 Q And they concern -- one is a tweet by Amy Kremer?

25 A Yes.

1 Q Another -- a second page is another tweet by Amy Kremer?

2 A Yes.

3 Q The third is a tweet by Dustin Stockton?

4 A Yes.

5 Q And a fourth is a tweet by Jennifer Lynn Lawrence?

6 A Yes.

7 Q And the point there is -- of these tweets is to show us what?

8 A That the individuals are making claims now in the press that I think are  
9 contradicting to where their mind-set was at that time or claims that they have made in  
10 their interviews or depositions.

11 Q So, to be more particular, you're saying that, in your opinion, these four  
12 tweets that you're showing us are of -- seem to be counter to what you understand the  
13 Kremers, Mr. Stockton, and Ms. Lawrence to be saying now that they were concerned  
14 about violence at the January 6th event?

15 A Oh, no, not -- not violence. "Rhetoric" I think would be a better term.

16 Q Rhetoric that could be interpreted as violent rhetoric?

17 A Well, I don't think violence was ever really something --

18 [REDACTED]. Battle?

19 The Witness. Battle. Yeah, I don't know about battle. But it's more -- them  
20 saying that they were concerned over certain people's rhetoric is a term that I've heard.  
21 And so, during that time, though, the rhetoric from them seems to be quite similar to  
22 others. And so that was something they never voiced to me. So I didn't -- like, and it  
23 has not been until after January 6th in this process that I've heard that claim be made.

24 BY [REDACTED]:

25 Q If I could then, on that point, when Taylor Budowich tells you that he thinks

1 that Ali Alexander and Alex Jones could be destructive to the President, Don Jr., and  
2 Kimberly Guilfoyle, how did you react to that?

3 A Well, that's separate. Taylor is not -- not them. But I -- and I already  
4 answered about how I reacted with Taylor.

5 Q Well, did you think that that was right that somehow Ali Alexander and Alex  
6 Jones were different than the other people who were potentially scheduled to speak,  
7 such as the Kremers?

8 A Yes. I consider them different people.

9 Q Different people, yes. But different in what their presence could do to the  
10 President's reputation or the reputation of Don Jr. or Kimberly Guilfoyle?

11 Mr. Parrish. Objection, form. It -- it assumes she knew what either group, the  
12 two you've referenced or those people, were saying at the time, as opposed to what she  
13 has found out now that they are saying.

14 The Witness. Right.

15                     . Good point. At the time, did you have a sense of what Alex -- Ali  
16 Alexander had been saying publicly about the "stop the steal" messaging?

17 The Witness. Not blanketly. I mean, he would tweet out things about stopping  
18 the steal.

19                     . As compared to the Kremers' messaging, were you following their  
20 messaging once you became involved --

21 The Witness. Not really, no. I wasn't really following any of these people's  
22 messaging.

23                     . You did just remind me. Micah, do you have the ability to pull up  
24 the video that you produced? There were two of them in production. And one of  
25 them -- I'm not going to be able to tell you the date -- but one of them is the one that

1 belongs to Ali Alexander, because that was the one thing I forgot to do. It's like a  
2 minute or two, and then I think we'll be done.

3 Mr. Kanters. My system -- because I'm logged on to our remote server, the  
4 system is blocking the application for us to play it --

5 [REDACTED]. Because the video is too big.

6 Mr. Kanters. -- a workaround.

7 [REDACTED]. That's okay.

8 Mr. Kanters. Oh, here we go. This might do it.

9 [REDACTED]. Take your time.

10 Mr. Kanters. Does it start with a women with her mask down?

11 [REDACTED]. Yes. A Black woman in like a judge coat.

12 [Video shown.]

13 BY [REDACTED]:

14 Q Had you ever watched that before? Oh, excuse me. Let me go back.

15 Can I let the record reflect that Ms. Wren during that time watched the video that had  
16 been previously produced as having been created by Ali Alexander.

17 Had you ever seen that video prior to just watching it?

18 A I still -- after watching it, I don't know.

19 Q You're not sure?

20 A Yeah.

21 Q When you were watching it, was the vibe that you got peaceful protest from  
22 that?

23 A Yes.

24 Q What did you interpret the "do something" to mean?

25 A Come to D.C.

1 Q Okay.

2 [REDACTED]. Are you good?

3 [REDACTED]. I'll just mark for the record, because I think we got up to exhibit 81,  
4 so the four tweets you gave are 82, 83, 84, and 85, respectfully. So we we'll have a  
5 record of that.

6 [Wren Exhibit Nos. 82, 83, 84, and 85

7 Were marked for identification.]

8 [REDACTED]. Perfect. I think that's it.

9 And we're off the record and concluded for the day.

10 [Whereupon, at 6:47 p.m., the deposition was concluded.]



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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.

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Witness Name

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Date