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

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11 DEPOSITION OF: WILLIAM BOCK, IV

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Friday, April 15, 2022

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Washington, D.C.

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The deposition in the above matter was held via Webex, commencing at 9:49 a.m.

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2 Appearances:

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5 For the SELECT COMMITTEE TO INVESTIGATE

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

7

8 [REDACTED], INVESTIGATIVE COUNSEL

9 [REDACTED] STAFF ASSOCIATE

10 [REDACTED] INVESTIGATIVE COUNSEL

11

12 For THE WITNESS:

13

14 JOHN BURLINGAME

15 DAN DELNERO

16 WILLIAM BOCK, III

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██████████ We'll go on the record at 9:49 a.m.

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Good morning. This is a deposition of William Bock, IV, conducted by the House Select Committee to Investigate the January 6th Attack on the United States Capitol pursuant to House Resolution 503.

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Mr. Bock, please state your full name and spell your last name for the record.

7

The Witness. My name is William Bock, IV, and my last name is spelled B-o-c-k.

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██████████ Thank you very much. And would you please raise your right hand to be sworn by the court reporter.

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

12

13

The Witness. I do.

14

██████████ Thank you, both.

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So this will be a staff-led deposition, and members, of course, may choose to ask questions if they show up. I don't see any on the Webex right now.

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My name ██████████, investigative counsel, and on the Webex today with me is ██████████ also investigative counsel.

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We will follow the House deposition rules that we've provided to your counsel previously. Under the House deposition rules, you are permitted to have an attorney present. And, Mr. Bock, at this time, I'm going to ask your counsel to please state his name for the record and to please state the names of anyone else who might be in the room for the record as well.

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Mr. Burlingame. Sure. My name is John Burlingame with Squire Patton Boggs representing the witness, Will Bock. With me in the room are two other attorneys for

25

1 Mr. Bock, and my co-counsel, first, Dan Delnero, D-e-l-n-e-r-o, and also with me here is
2 William Bock, III.

3 [REDACTED] Thank you very much, Mr. Burlingame.

4 Under the House deposition rules, neither committee members nor staff may
5 discuss the substance of testimony you provide today unless the committee approves
6 release. You and your attorney will have an opportunity to review the transcript. But
7 before we begin, I'd like to just describe a few ground rules.

8 There's an official reporter transcribing the record of this deposition. The
9 reporter is also joining us by Webex. So just because of the limits of technology, please
10 make sure to wait until each question I have asked is completed before you begin your
11 answer, and I will -- myself and [REDACTED] and whoever else who will join will do the same and
12 try to wait for your answer to finish before we ask our next question. The reporters just
13 have a really hard time hearing voices overlapping, especially over Webex.

14 Mr. Burlingame. Hey, [REDACTED], I'm sorry, let me interrupt. I think we've now got
15 me hooked up to the video system in the room, so Dan is going to click a button.

16 [REDACTED] There you go, okay. Let's take --

17 Mr. Burlingame. Can you --

18 [REDACTED] Let's take a quick recess in place and figure this out.

19 Mr. Burlingame. Let's -- yeah, we can go off the record. I apologize.

20 [Discussion off the record.]

21 [REDACTED] Let's go back on the record at 9:55. So the reporter cannot record
22 nonverbal responses, such as shaking your head, so it is important that you answer each
23 question with an audible, verbal response. And for the benefit of the reporter and the
24 record, there may be times where I spell a name or a word that we are using, or that I ask
25 that you do the same.

1 And we ask that you provide complete answers based on your best recollection.
2 If the question is not clear, which is almost certain to happen, please just ask for
3 clarification. If you do not know the answer, please simply say so.

4 And logistically, please let us know if you need any breaks for comfort, or if you
5 would like to discuss something with Mr. Burlingame or you other attorneys privately,
6 and we are happy to accommodate.

7 Throughout the deposition, we will be directing your attention to exhibits, which
8 will be displayed on the screen, and when we refer you to a document, you can take time
9 to familiarize yourself with it before we discuss.

10 ██████████ So I'm going to pull up exhibit 1 and we'll see how this is working.
11 There we go. Mr. Bock, can you see exhibit 1?

12 The Witness. I can -- is there -- I can -- it's sort of far away. Is there a way we
13 could just look at exhibit --

14 Mr. Burlingame. Yeah, you can see it for purposes and I can pull out the exhibit.

15 The Witness. I can see, you know, "subpoena" at the top of the --

16 ██████████ Right.

17 Mr. Burlingame. I'm putting the subpoena in front of him as well, ██████████

18 ██████████ Okay. Mr. Bock, do you recognize that as the subpoena and
19 accompanying documents that the select committee issued to you?

20 The Witness. I -- I recognize this as the subpoena that I received.

21 ██████████ Thank you. So under the subpoena's rules, you may only refuse to
22 answer a question to preserve a privilege recognized by the select committee. If you
23 refuse answer a question based on privilege, staff may either proceed with the
24 deposition, or seek a ruling from the chairman on the objection. If the chairman
25 overrules such an objection, you are required to answer the question.

1 Now, Mr. Burlingame, I understand that you sent a letter to White House counsel
2 asking for their opinion about executive privilege. Is that correct?

3 Mr. Burlingame. Not quite. I did that with a previous witness, [REDACTED] I
4 actually called White House counsel this time around, requested a letter from the
5 White House with respect to assertions of executive privilege and received a letter from
6 White House counsel, which I know you have as well.

7 [REDACTED] Is this the letter?

8 Mr. Burlingame. Yes, sir.

9 [REDACTED] In which counsel states that President Biden accordingly has decided
10 not to assert executive privilege as to Mr. Bock's testimony regarding the subjects that
11 you discussed or any documents he may possess that bear on them?

12 Mr. Burlingame. Yes, that is the letter I received from White House counsel and
13 that the witness has seen as well.

14 [REDACTED] Thank you very much.

15 So at this time, Mr. Burlingame, I'd ask that you please place on the record any
16 objections you might have or any opening remarks that you'd wish to make.

17 Mr. Burlingame. I appreciate that, [REDACTED] My only opening remark is this
18 witness will be testifying, I don't expect to assert any privileges, but obviously his
19 testimony is not -- is not and is not intended to be a waiver of any privilege that any other
20 individual may wish to assert.

21 [REDACTED] Understood. Thank you.

22 And, Mr. Bock, I also want to remind you -- and we do this for all witnesses -- that
23 it is unlawful to deliberately provide false information to Congress. Since this deposition
24 is under oath, providing false information could result in criminal penalties to include for
25 perjury and/or providing false statements. Do you understand?

1 administration with a different title, director of research for the Office of Speechwriting.

2 Q Do you think that last title is the one that you held from November 2020 to
3 January 2021?

4 A I believe that it was in December of 2020 that my title changed from
5 researcher to director of research. I would -- I don't exactly recall the date that that
6 changed.

7 Q Was there a significant change in your role, though, with the change in title
8 from November to December 2020?

9 A There was not a -- I wouldn't call it a significant change. I was doing many
10 of the same things that I had been doing as a researcher, yeah.

11 Q What additional responsibilities did you have?

12 A I was asked to help with a presidential proclamation as director of research
13 and -- and also to help with a particular report concerning the 1776 commission that the
14 administration was attempting to establish.

15 Q Understood. Thank you.

16 In the time period we're primarily concerned with, November 2020 to
17 January 2021, who did you report to?

18 A I reported to, well, really all of the speechwriters in the office. I would say I
19 primarily reported to Patrick MacDonnell, who was the former director of research in the
20 Office of Speechwriting. And then I also worked -- I would say I worked closely with all
21 of the speechwriters in the office.

22 Q Including Vincent -- Vincent Haley and Ross Worthington?

23 A Yes.

24 Q Did you ever work directly with Stephen Miller?

25 A I -- I don't believe I worked directly with Stephen Miller. I was -- I would

1 report to Ross and Vince, who may have interacted with Stephen Miller, but I was mainly
2 working with Patrick and the other speechwriters.

3 Q Understood. Thank you. Did you supervise anybody during that time?

4 A I supervised a group of interns at that time.

5 Q Great. Thank you. And can you just give me a quick rundown of your
6 responsibilities as the researcher?

7 A Yeah. So as the researcher, I would provide research to support and inform
8 the remarks of the President, just trying to collect information that would help the writers
9 as they were drafting presidential remarks. I would say that was my primary
10 responsibility. I also helped with, as I mentioned, you know, drafting a presidential
11 proclamation and doing some other research just for senior administration officials like
12 Vince and Ross.

13 Q Great. Thank you. And did you have, like, a standard process for the
14 research tasks generally for speeches?

15 A Yes, I did. Yeah, the standard process would be we would hear about a
16 particular event that was upcoming, and we would be asked to collect research
17 concerning that particular event. So if it was on criminal justice reform and the
18 President was -- was speaking about that topic, we would attempt to collect information
19 about what the administration had done to effectuate criminal justice reform, what
20 legislation the President had signed, any previous remarks that the President had put
21 together or already delivered on the topic of criminal justice reform, and other factual
22 information that the writers requested.

23 Q So correct me if I'm wrong here, then the first place you looked for were
24 statements already made by the administration and sources coming out of the
25 administration and then towards supplemental factual information?

1 A I would say that it wasn't like we looked at one particular place first. It was
2 sort of we'd provide a research product that had all of those elements where we had, you
3 know, past statements as well as additional research that we had done, you know, if the
4 event was on criminal justice reform just, you know, statistics and policy-related
5 information that the writers had requested.

6 Q Understood. And as a grad student, you are learning this well. Did you
7 use like social science databases, legal databases like, you know, HeinOnline, that kind of
8 thing, or was it more open source?

9 A It was both open source, as well as legal databases. We also would collect,
10 if particular agencies, you know, had given us our office information, that would, in some
11 cases, be passed along to us to put together into the research product, that would then
12 be given to the writers. So it was -- it was open source, it was looking at scholarly
13 databases, it was also collecting the internal information that we had.

14 Q Great. Thank you. Did you also have a fact-checking role as part of your
15 research portfolio?

16 A I did, yes.

17 Q And can you describe the process generally for fact-checking for me?

18 A Yes. So we would -- I would receive a set of presidential remarks. A draft
19 would come to me, and I would work to try and find support for the particular statements
20 that were made in the remarks. And this was -- this was a collaborative process
21 between me and the writers, as well as other White House components who would also
22 be reviewing the remarks, as we were all trying to work to ensure the accuracy of the
23 statements that were made. And it was mainly collecting information to demonstrate
24 that there was support that was being relied on in the particular statements that made
25 their way into the draft of the President's remarks.

1 Q Great. Then what happened if yourself or another researcher who's doing
2 fact checking found something that you could not verify?

3 A We would usually put a comment to the side, like when we're -- we receive
4 the text of the remarks, we would, you know, just put a comment in the Word document
5 noting that we did not have -- we did not believe, you know, in our personal opinion, that
6 we could find sources supporting that.

7 And so -- so in the vast majority of instances, it was leaving the comments that we
8 would then later discuss with the writer, sometimes as well it was also just a verbal
9 discussion that we had with the writer that -- you know, where I would go ask like where
10 exactly, you know, did the information that we're relying on for this statement come
11 from.

12 Q Thank you. And were your statements about being unable to verify certain
13 facts determinative about whether that claim would make it into the final speech?

14 A I don't know if I can give you a, like a categorical statement on that. I
15 would say that, you know, every time that, you know, I would leave a fact check with Ross
16 and Vince, they would always come to me -- that -- always that I can remember would
17 come to me and try and work through whatever suggestions or comments I had left for
18 them. Ultimately, it was the decision of the writers themselves as to what the draft that
19 was sent to other White House components would look like.

20 Q Thank you. That's very helpful. Do you know, to the best of your
21 recollection, if any claims that you fact-checked and found could not be verified ever
22 made their way into draft speeches that the President saw?

23 A To the best of my recollection, I -- I don't recall particular instances
24 where -- where that happened. It certainly could've, but I don't recall.

25 Q Great. Thank you. And I know earlier you mentioned that you never

1 directly worked with Stephen Miller on speechwriting, I believe. Did you ever have
2 direct contact with him about draft speeches?

3 A I don't recall a particular instance. You know, sometimes, I believe, he
4 would come and discuss remarks with Ross and Vince, and I may have been in the room,
5 but I don't recall an instance where it was just me and Stephen, you know, talking about,
6 you know, what should be in a presidential speech.

7 Q Did you ever have direct contact with the President about draft speeches, or
8 were you ever in the same room when the President was talking with the speechwriting
9 team about draft speeches?

10 A I did not have direct contact with the President. And I was in the room one
11 time with the President, I think only one time during the course of the administration,
12 and that was for a photo op at the end.

13 Q Okay. So not discussing a draft speech?

14 A That's correct.

15 Q Thank you. So we are going to talk about election night quickly here. On
16 election -- for election night, did you help with any draft speeches that were prepared for
17 the President that day?

18 A I -- to the best of my recollection, I don't believe I did for that particular
19 evening.

20 Q Great. Did you know anything about the speech that President Trump
21 ended up delivering on, I think it was the early morning of November 4th?

22 A I may have read it after that period in time, but I don't -- I guess I'm
23 wondering, when you say know anything about --

24 Q Sorry. That's a very vague question. Were you -- I will definitely clarify
25 for you. Were you part of any conversations with the speechwriting team where they

1 were discussing the speech that President Trump delivered on the morning of
2 November 4th?

3 A I don't recall being part of those conversations.

4 Q Did you hear anything on November 3rd or in the early morning hours of
5 November 4th about why President Trump delivered the speech that he did?

6 A So when you say did you hear anything, I'm just wondering, what -- I mean, I
7 heard public reporting.

8 Q Outside -- outside of public reporting, so, you know --

9 A Okay.

10 Q -- within your professional role.

11 A I don't -- I don't remember any, you know -- I just was not involved in
12 conversations with the other writers, to the best of my recollection, about those
13 November 4th remarks.

14 Mr. Burlingame. Hey, [REDACTED], just to maybe help you out a little bit here.

15 [REDACTED] Yeah.

16 Mr. Burlingame. You might want to ask the witness where he was on Election
17 Day or election night.

18 BY [REDACTED]

19 Q That's true. That's the question I forgot to ask at the beginning. Where
20 were you on election night, Mr. Bock?

21 A I was back at my apartment. I was not at the White House.

22 Q Thank you. And just to close the loop, because you said the speechwriting
23 team, you don't remember hearing anything, you were not part of any phone meetings
24 that day with anyone from the White House about the speech that President Trump
25 delivered on the morning of November 4th?

1 A I don't recall being part of any of those -- any phone meetings related to
2 that.

3 Q Great. Thank you very much.

4 A A little after the election, do you remember working with Vince Haley on a plan to
5 try to secure a second term for President Trump through State legislatures?

6 Mr. Burlingame. Object to the form, but go ahead and answer.

7 The Witness. I remember working on a particular statement that Vince had
8 requested, yes.

9 BY [REDACTED]

10 Q Can you -- do -- can you explain anything about the idea that you worked on
11 with Vince?

12 A Yes. So Vince had asked for and had, you know, called me and given me
13 some language. He just -- I think he wanted a -- to the best of my recollection, to state a
14 short statement on -- concerning the role of State legislatures in regards to the 2020
15 election, and he had language for the draft that he was just telling to me to include in the
16 draft. I would -- I would say that, you know, from -- that -- that that was really the
17 extent of my involvement was putting together the State legislature statement.

18 Q Did you have substantive discussions about the idea with Mr. Haley?

19 A When -- just about what was supposed to be in the particular statement?

20 Q About the idea itself, so about the idea that he wanted you to write about.

21 A I -- he called me, and I remember having conversations about what should
22 be in the statement and --

23 Q Okay. Do you remember talking about the idea of delay -- using State
24 legislatures to delay until January 6th?

25 A I don't remember --

1 Mr. Burlingame. Object to the form. Go ahead and answer.

2 The Witness. I don't remember the date January 6th ever coming up in the
3 course of that conversation related to State legislatures. The State -- what I do recall
4 from our conversation was that the State legislature -- I had an opinion that the State
5 legislature should be focused on investigating fraud in the 2020 election.

6 And I think we worked -- you know, Vince gave me some guidance about what
7 his -- what language to include, but ultimately, we worked to a statement that
8 asked -- that would have reflected State legislators simply investigating fraud claims in the
9 2020 election.

10

BY [REDACTED]

11 Q All right. Let's pull up exhibit 6. By "let's" I mean I will pull up exhibit 6.
12 Can you see that on the screen, Mr. Bock, or do you have it printed out, Mr. Burlingame?

13 Mr. Burlingame. I have this one, right. It's the document. Yes, we've got it in
14 front of the witness, [REDACTED]

15

BY [REDACTED]

16 Q Is this the model resolution that you were just talking about, Mr. Bock, or
17 what you remember drafting?

18 A This does look like that. It is that document, yes.

19 Q So let's -- if you want to look at page 2.

20 A Okay.

21 Q The third paragraph, there's a clause that begins after the word "one-vote
22 standard." State legislators have a compelling interest and affirmative obligation to
23 search out and prevent the effective nullification of the voters' will through illegal voting.
24 And then we cannot, in good conscience discharge, our constitutional responsibilities
25 under Article II until we know we are not acting with complicity in a fraudulent and

1 abusive process.

2 I'll give you a second to read it.

3 A Okay.

4 Q Great. So how would -- how would you know that there wasn't a
5 fraudulent and abusive process such that State legislators could certify the election
6 results?

7 A Are you asking for -- for my personal opinion?

8 Q In this letter, what was the expectation, if you can talk about it, for the State
9 legislatures to do to feel secure that the election was not fraudulent and abusive and they
10 could certify the results?

11 A Yeah. I think that that would be contained in the model resolution, which
12 was attached to this letter -- or attached to this statement, which should be on pages 4
13 and 5 of exhibit 6.

14 Q And can you explain what that would've been?

15 A Yes. So on page 5 of exhibit 6, it says, the undersigned, duly elected
16 members of the legislature do hereby signify our intent to our -- to fulfill our
17 constitutional duty to consider whether it can be determined from the certified election
18 results.

19 And, I mean, you can read the rest of it. But basically this statement, you know,
20 in this model resolution to -- you know, my opinion concerning it was that it was calling
21 for investigations and recounts to be done to ensure that there was not fraud or illegal
22 voting occurring in the 2020 election.

23 Q And was that calling for courts to be involved or other entities to do the
24 recount?

25 A I'm -- I don't exactly recall if it -- if it had a statement that concerns -- that

1 concerned that. I just -- I think the statement was just, you know, what should the State
2 legislatures do.

3 Q I think -- I'm just trying to get a sense then of how State legislatures would
4 feel secure that there was no fraudulent and abuse in the election. Like where is the
5 end where it's like, Okay, you know, we've put out this statement, we've done our due
6 diligence and we will certify?

7 A I mean, I think what -- what I was envisioning was just that they would, you
8 know, have an investigation done of, you know, credible claims of voter fraud. And if
9 those prove to be true, then -- then they would need to take that into consideration, but
10 if they didn't, then that would be the end of that.

11 Q So if we look at page 3 of the exhibit, the last sentence, specifically the last
12 two lines, but I'll read a little more, It's our sacred obligation under the Constitution
13 demands no less and the American people who faithfully exercise their right to vote on
14 November 3rd deserve no less than a full and accurate count, and if necessary, recount of
15 every legal vote or a revote that complies with the law and is not tainted with fraud,
16 uncertainty, or illegality.

17 I'm not asking for your full legal opinion here, given you're still a 1L, but to the
18 best of your understanding, has there ever been a revote of a presidential election?

19 A I -- there -- I don't -- I don't -- I can't think of a particular example that -- that
20 comes to mind at the moment.

21 Q And did that idea also come from Mr. Haley?

22 A I -- I don't believe so.

23 Q Do you know or remember where the idea for a revote came from?

24 A I -- I believe that it -- it came from some discussions I had with a family
25 member.

1 Q Okay. Without touching the substance of those conversations, is that your
2 father, William Bock, III?

3 A It would be, yes.

4 Q Okay. Thank you.

5 And in terms of -- did anybody else help that -- sorry. Let me rephrase. Did you
6 work with anybody else outside of the White House on this idea?

7 A I don't recall that I did.

8 Q Okay. And do you remember -- do you know if Stephen Miller had any role
9 in pushing for Mr. Haley to work on this plan involving State legislators?

10 A Not to the best of my knowledge.

11 Q And do you know Mr. Randy Evans?

12 A I do. I do know.

13 Q Did you know -- I should -- I should have been more clear. Did you know
14 Mr. Randy Evans in November 2020 when you were working on the State legislature
15 plan?

16 A I did not know him personally at that -- that time. I may have met him, but
17 I wouldn't say we -- I don't -- I don't think, to the best of my recollection, like we
18 communicated concerning this statement.

19 Q Thank you. Did you communicate with Newt Gingrich about this
20 statement?

21 A Are you referring to the State legislature statement?

22 Q Yes.

23 A I -- I don't think that I did. I don't think I did.

24 Q Understood. Did you show this statement to anyone in the White House
25 besides Mr. Haley?

1 A I don't recall. I don't -- I don't remember. I think I -- I just sent it to Vince
2 Haley, but I don't exactly remember for sure.

3 Q Do you know if Mr. Haley showed this to anybody else in the White House?

4 A I don't know.

5 Q Great. Thank you. Do you know if it ever got sent to any State
6 legislatures?

7 A I don't know.

8 Q Totally fine. Thanks. I'm just going to pull up exhibit 7 quickly. This is an
9 email from Mr. Haley to yourself. I believe it's you. Fair enough that that there
10 multiple -- and we actually don't have any other information here. So is this -- to the
11 best of your knowledge, since you produced this email, is this -- was this sent to you,
12 Mr. Bock?

13 A I -- I believe it was, yes.

14 Q Thank you. So I'm just going to jump back to exhibit 6 quickly to do a little
15 date display. So the statement you showed us was drafted, it looks like, on
16 November 9th. And then on exhibit 7 we see this email comes through on
17 November 11, 2020, and it starts with, do not forward. Do you know why Mr. Haley
18 asked you not to forward this email?

19 A I do not.

20 Q Okay. Did you talk to him about option number two here, which says,
21 Pelosi/Schumer, raw partisan political power rule. GOP legislatures elect to not send
22 in -- sorry -- in electors from an unreliable and rigged system before all questionable
23 conduct has been answered, which means Biden does not receive 270 electoral votes,
24 and consequently, the House voting by State delegations, 26 elect the President, Trump
25 wins.

1 Do you remember talking to Mr. Haley about that statement?

2 A I don't recall a conversation about point number two.

3 Q Did you have any conversations with anyone in the White House about this
4 State legislature option?

5 A I don't -- I don't recall, other than with Vince, conversations to that effect.

6 Q Thank you. And do you know when you stopped working on this idea with
7 Mr. Haley?

8 A I -- I can't remember the exact date, but I believe it -- it would have been
9 sometime in -- in mid-November, but I -- I can't remember an exact date.

10 Q That's totally fine. Very helpful. Do you know why you stopped working
11 on it in mid-November?

12 A I don't know why.

13 Q Great. Thank you very much. Let me take this down if I can figure that
14 out. Okay.

15 Are you aware of a speech that the President or someone in the President's staff
16 put out on December 2nd that was recorded on November 26th?

17 A I -- I'm not sure. Those dates -- can you maybe give me a little more
18 information? It's not really -- those dates are not exactly jogging my memory.

19 Q Yeah. It was a speech that the President prerecorded in late November
20 about election fraud issues and then it was released on December 2nd on, I think,
21 YouTube. So --

22 A Okay. I --

23 Q Does that --

24 A Go ahead.

25 Q I was going to say, does that help with your memory?

1 A Yes, I think I would've been aware of those remarks.

2 Q Great. Let me pull up exhibit 8. Exhibit 8 is an email that you provided to
3 us. It's from Mr. Worthington to yourself. Wait, oh, sorry, Mr. Worthington provided
4 this one to us. You provided a similar one. Mr. Worthington sent this to yourself -- or
5 I'll ask again. It is only William Bock -- it has your alumni email in there but not at the
6 top. Was this email sent to you?

7 A Yes, it was.

8 Q Okay. Thank you. It was sent on November 23rd. There's a good
9 chance that the 9:04 p.m. is in UTC, which means it really came in around 4:04 p.m.
10 We've had this issue with some emails. The subject is, Separate email with fact-checked
11 notes. And you'll see a bunch of statements.

12 And correct me if I'm wrong, but it looks like you responded with a bullet, like
13 what decision are we referring to here, and Mr. Worthington's responses are in bold and
14 caps. Do you -- did you do any fact-checking on an election speech around
15 November 23rd?

16 A I believe I did.

17 Q Would that be the speech that was recorded -- prerecorded and then
18 released on December 2nd?

19 A I -- I don't recall whether that was the same one, but I did review an
20 election-related speech around that time.

21 Q That's fine. Do you remember what happened -- sorry. Did you have any
22 conversations with Mr. Worthington about the issues that you raised in this email after
23 this email?

24 A It is -- it is -- so you're saying any conversations I had with -- that I had -- did I
25 talk to Ross after I sent --

1 Q About these -- the concerns that you raised in this email.

2 A I -- I believe that I did discuss these concerns with him after this email, yes.
3 I don't fully recall what was said, but I think -- I believe I -- we had a conversation about
4 this.

5 Q Do you have a general sense of what was talked about?

6 A I believe it would have just been the notes that I had made concerning some
7 of the -- the sentences in the draft remarks.

8 Q Okay. So we'll go down if you want to look at the bottom
9 of -- oops -- bottom of page 2. You'll see a note from yourself, Can't confirm. And
10 Mr. Worthington responds, I believe this is correct. Is this one of those -- is this an
11 instance where what Mr. Worthington or Mr. Haley believed to be correct would trump
12 your own ability to verify a statement?

13 A I don't -- I don't remember ultimately, you know, which -- which of our views
14 came out concerning this particular -- came out, you know, in the draft remarks
15 concerning this particular statement. However, when Ross is saying I believe this is
16 correct, my -- my understanding of that would be can you please do further research to
17 confirm that you can't -- that you, you know, you can't confirm that particular sentence.

18 Q And is that reflected at the bottom of page three -- sorry, the next page, at
19 the bottom of the next page of the email, can't confirm this exact process, and
20 Mr. Worthington responds, we believe this is true, try to confirm?

21 A Yes.

22 Q And we talked about it a little earlier, but in the context of these specific
23 facts, do you remember what you did to try to confirm the veracity of these statements?

24 A I believe I sent Ross a whole another email with -- with more notes to
25 respond to his particular notes.

1 Q Let's see if it's exhibit 9. So exhibit 9 is an email from yourself to
2 Mr. Worthington. It looks to be about a half an hour after the email we just looked at.
3 Do you think that this is your response to Mr. Worthington?

4 A I believe it is.

5 Q Thank you. And at the top here you say, For all Rudy claims, I recommend
6 we reconfirm with him those claims before the President says them. Why did you have
7 that bolded and underlined at the top of this email?

8 A Because I -- I -- I thought that we should reconfirm all of the Rudy claims
9 with Rudy before -- before those made their way into the draft.

10 Q Right. But could -- is that because you could not independently verify
11 Mr. Giuliani's claims?

12 A At that point, I could not independently verify. It would depend on -- I
13 think some of the claims that had been made I could verify, but I could not verify all of
14 them, and so I -- that's why I put the note to Ross.

15 Q Was this -- in this period, you know, following the November 2020 election
16 up until January 6th, was it common for you to have to double-check or reconfirm with
17 Mr. Giuliani about claims that you made in these draft speeches?

18 A I don't --

19 Q Not you personally, sorry, but to you to recommend that somebody
20 reconfirm with Mr. Giuliani?

21 A I -- I don't -- I don't think I would say it was common. I -- I recall just like
22 two particular instances where that happened.

23 Q What was the other instance?

24 A It was related to claims concerning the January 6th speech.

25 Q Okay. We can circle back on that in a little bit. Did you have

1 conversations with other researchers, other people besides Mr. Haley and
2 Mr. Worthington about the verification of Mr. Giuliani's claims?

3 A I -- I'm not -- I may have. I don't -- I don't recall.

4 Q Was it commonly understood among your team or commonly discussed that
5 you would have to do extra work to try to check Mr. Giuliani's claims?

6 Mr. Burlingame. Object to the form.

7 The Witness. I don't -- I can't speak to what other people thought. I did not
8 have that particular opinion.

9 BY [REDACTED]

10 Q You just mentioned another instance involving the January 6th speech. Do
11 you know if any of the facts that you checked for this November draft speech were used
12 later for other election speeches, including the January 6th speech?

13 A I don't -- I don't recall.

14 Q Thank you. Do you know if anyone from the Trump campaign helped on
15 this draft speech?

16 Mr. Burlingame. This would be the speech that was aired on the 2nd of
17 December?

18 [REDACTED] Yeah, with the understanding that this -- these edits are fact-checks
19 are for that speech.

20 Mr. Burlingame. Thank you.

21 The Witness. I don't recall other campaign members. I don't -- I don't know if
22 they did or not.

23 BY [REDACTED]

24 Q That's fine. Thank you. Do you -- did you listen to the President deliver
25 his remarks in the prerecorded version?

1 A I -- I don't believe I -- are you asking if I was there when the President was
2 saying them like to record those?

3 Q Either there or listening live as he was doing it.

4 A I don't believe I was there when the President was recording those remarks.

5 Q Did you talk to anyone in the White House who was there, or listening live,
6 while the President was delivering his remarks?

7 A I don't -- I don't -- not to the best of my recollection.

8 Q Did -- do you have any sense of how the speech was -- as delivered was
9 received by people in the White House generally?

10 A I don't -- I don't -- I don't remem -- I don't have a sense of that.

11 Q That's fine. Thank you. I'm going to pull up exhibit 10. Bear with me as
12 I zoom in. These are text messages and they are quite small, so I apologize. These are
13 text messages on November 26th between Robert Gabriel, Vince Haley, and Ross
14 Worthington. So you are not -- as far as I can tell, you are not part of these text
15 messages.

16 Mr. Burlingame. And, [REDACTED] let me just tell you that, at least, I can't see them
17 on the screen.

18 [REDACTED] You can't see them?

19 Mr. Burlingame. I don't think the witness can.

20 The Witness. I can't.

21 [REDACTED] Well, that's okay.

22 Mr. Burlingame. But I can't even read that because it's so small.

23 [REDACTED] Right. So let me just represent --

24 Mr. Burlingame. So if you want to make representations about what it says, I'm
25 happy to accept them, but we just -- we can't see these.

1

BY [REDACTED]

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Q That's perfectly fine. I will -- I was just going to use this as basically a representation that these three, Mr. Gabriel, Mr. Haley, and Mr. Worthington, talk about the speech after it was delivered. They mention that they liked it. And then it seems like Mr. Haley says, it's not going out ever. That's a shame.

So do you remember why this speech as recorded did not immediately go out?

A I don't remember.

Q Great. Thank you very much.

In early December of 2020, did you work on a lawsuit in your role in the speechwriting office?

A In my role --

Q I'm not asking about any other, you know, legal work you might have done outside of your role in the speechwriting office, but were you working on a lawsuit while you were a member of the speechwriting office?

Mr. Burlingame. And what time period, [REDACTED]

[REDACTED] Early December 2020.

Mr. Burlingame. Thank you.

The Witness. When you say working on a lawsuit, I guess, I'm -- I don't fully -- I don't believe that I was -- I guess, I would just -- can you maybe clarify a little bit more about what you're referring to when you say working?

BY [REDACTED]

Q Yeah. I don't mean in a legal sense in terms of like doing, you know, drafting legal arguments, but were you part of a team that, in any sense, was helping edit or draft legal filings for a lawsuit in early December?

A I -- I don't recall the -- I may have been working -- I'm just trying to

1 remember. I -- I remember -- I don't remember exactly -- I could've been working on a
2 particular -- I guess, I just don't recall.

3 Q That's fine. We'll pull up exhibit 15, which we -- this came from the
4 National Archives, and you'll see at the top it is in -- can you see it actually, assuming you
5 don't have this printed out?

6 Mr. Burlingame. Can you see that?

7 The Witness. I can't exactly see it. Do we have it?

8

BY [REDACTED]

9 Q Let me try to zoom in a little. Is that --

10 A That's a little better, yes. Yeah.

11 Q Actually, do you want to recess in place really quickly --

12 Mr. Burlingame. Yeah.

13 [REDACTED] -- and we can talk about -- yeah, let's recess in place very quickly.

14 Mr. Burlingame. Okay.

15 [Discussion off the record.]

16

BY [REDACTED]

17 Q We'll go back on the record at 10:46 for the deposition of William Bock, IV.

18 So, Mr. Bock, I have pulled up exhibit 15, which as I started to describe, was an
19 email that was produced by the National Archives, and it is from Mr. Haley, so work email
20 account to yourself. It's on December 3rd, 2020, at 2:23 p.m. The subject is, Forward:
21 Papers requested. Attachment: State versus States complaint 2020, November 30th,
22 version four draft. And all Mr. Haley says to you is Do not forward.

23 So I will scroll down and you can see that it went from Mr. Miller to
24 Mr. Worthington and Mr. Haley. Before that, from Ms. Molly Michael to Mr. Miller, and
25 from before that from a Michael Farris to Molly Michael. Is -- do you know anything

1 about why you received this email from Mr. Haley?

2 A I -- I don't -- I think it may have related to -- I believe that they had discussed
3 talking about, like, the introduction concerning this complaint, but I don't -- I don't exactly
4 recall what Vince was asking me to do with this.

5 Q And when you said "they" were talking about, is that Mr. Worthington and
6 Mr. Haley?

7 A Yes.

8 Q Does that include Mr. Miller?

9 A Not to my knowledge.

10 Q Do you know who Michael Farris is?

11 A I do.

12 Q Who is he?

13 A I believe he is the -- he works with the Alliance Defending Freedom.

14 Q Do you know why he forwarded info requested about this apparent
15 complaint?

16 A Why he forwarded this -- I don't exactly know why he sent it.

1

2 [10:48 a.m.]

3

BY [REDACTED]

4

Q Sorry. Why he -- why he sent it -- I apologize. That was not -- do you

5

know why Mr. Farris sent this email to Molly Michael with info requested and asked her,

6

or whoever, to focus on pages 1 through 6?

7

A I don't exactly know why Mr. Farris did that.

8

Q Do you have a general sense of what the speechwriting team was doing

9

aside from maybe working on the introduction?

10

A No. I -- to my knowledge, based off my recollection, I think they were just

11

working on the introduction.

12

Q And to the best of your knowledge, was it common for the speechwriting

13

office to be working on a lawsuit like this?

14

A Not to the best of my knowledge.

15

Q Had you ever worked on a lawsuit before in your official role as a speech

16

writer in the White House during your time there?

17

A I don't recall that I did.

18

Q Thank you. Did you hear any conversations among anybody in the White

19

House about this complaint?

20

A I may have. I don't -- I don't recall what -- I mean, I don't -- I just don't

21

recall those conversations, but I may have heard conversations about it.

22

Q Right. And if you had heard, you just don't remember the substance of

23

them, correct?

24

A That's correct, yes.

25

Q Okay. Thank you.

1 Mr. Burlingame. Hey, [REDACTED] whenever we get to a decent spot, could we do a
2 5-minute break?

3 [REDACTED] You hit the nail on the head. Let's take a 5-minute recess.

4 Mr. Burlingame. All right. Thank you.

5 [REDACTED] Thanks. We'll go off the record at 10:50, and we'll aim to come
6 back at 10:55.

7 [Recess.]

8 BY [REDACTED]

9 Q We'll go back on the record at 11:00 for the deposition of William Bock IV.
10 Mr. Bock, when did you learn that President Trump would be speaking on
11 January 6th on the Ellipse of the White House?

12 A I don't recall the exact date, but I believe it would've been sometime
13 either -- I believe it was the first week of January 2021 or the last week or so of
14 December, sometime around that timeframe, I believe.

15 Q And were you involved at all in the drafting process?

16 A I was.

17 Q And was that in your role as a researcher and fact-checker?

18 A It was, yes.

19 Q Did you have any drafting responsibilities?

20 A I -- I don't -- I wouldn't -- I wouldn't consider them drafting responsibilities.
21 I would say it was research responsibilities.

22 Q I trust your expertise. I want to pull up exhibit 18. So this is an email that
23 you sent to Mr. Worthington and Mr. Haley on the morning of January 5th at 10:36 a.m.
24 Its subject line is full research document attachment election numbers. And you say,
25 hope this helps.

1 And then there is a, I'll represent to you, a quite a long attachment, and I can scroll
2 a little more slowly or you can peruse it quickly. Do you remember where you pulled all
3 of these election materials together from?

4 A I don't recall where I pulled all of the election materials.

5 Q Fine. That was a very bad question.

6 Was this document something that you had been compiling since after the
7 November 2020 election?

8 A It would've been after the November 2020 election that I had put
9 these -- these points together, yes.

10 Q Okay. And do you, to the best of your recollection, had you or the
11 speechwriting office used these facts in earlier drafts of the speech -- sorry -- earlier
12 drafts of election speeches?

13 A It is possible that we had -- you know, that some of these claims had
14 been -- or statements had been made in earlier speeches. I don't -- I don't recall.

15 Q That's okay. And earlier this morning, you mentioned a second instance
16 where you remembered raising, I guess concerns is the best way to put it, about claims
17 that came from Mr. Giuliani. Were any of those claims in this research packet, to the
18 best of your recollection?

19 Mr. Burlingame. Go ahead and flip through those.

20 BY [REDACTED]

21 Q Yeah, take your time.

22 A Just give me one second. Sorry.

23 Q Oh, no, no. Take your time.

24 A I just -- I don't recall whether there were -- that it -- there were claims from
25 Mr. Giuliani in this document.

1 Q That's okay. Was there a separate document that Mr. Giuliani sent to this
2 speechwriting team or sent to the White House that got to the speechwriting team for
3 the January 6th speech?

4 A I believe there -- I recall a spreadsheet being sent to -- that Ross had showed
5 me. I believe -- I believe he said that was from Mr. Giuliani's office.

6 Q And is that the spreadsheet that you remember raising some sort of
7 concerns about having to verify Mr. Giuliani's claims again?

8 A I wouldn't -- I would -- I -- you know, concerns are -- you know, I would say, I
9 made a request to Ross to -- you know, to just -- to just reconfirm those particular
10 statements or facts because I had not been able to confirm them.

11 Q Did you ever ask Mr. MacDonnell or other people, other researchers, maybe
12 even interns, to help try to verify any of those claims?

13 A I don't believe I would've asked interns to do that. I may have asked -- I
14 may have talked with Patrick about those claims.

15 Q Did he try to verify those claims, to the best of your knowledge?

16 A I don't -- I don't recall. I just -- I may have mentioned them to him, but I
17 don't know -- I don't recall if he tried to also attempt to verify.

18 Q Do you remember if the speechwriting team got any materials for the
19 January 6th speech from Cleta Mitchell?

20 A I don't -- I don't recall. I don't recall.

21 Q That's fine. Exhibit 19, you probably want to look at this one on the laptop
22 because it's from the National Archives. So I'll give you a second to pull it up.

23 Mr. Burlingame. We've got it.

24

BY [REDACTED]

25 Q So you are not on this email chain, Mr. Bock, but it's from -- the original

1 email -- can you scroll down a little bit -- is from Molly Michael on January 4th to
2 Mr. Worthington and Mr. Haley, and the subject is some potential material.

3 Then if we scroll up, you see that the next email, which is a little later in the night,
4 depend- -- or, you know, depending on UTC problems, has --

5 Mr. Burlingame. Sorry. Will just --

6 [REDACTED] Oh, no, that's okay.

7 The Witness. -- had the wrong thing, so.

8 The Witness. Sorry about that. Hold on.

9 Mr. Burlingame. Okay.

10 The Witness. Okay. Yeah, I'm back on the document. Sorry about that.

11

BY [REDACTED]

12 Q That's okay. So do you see the second email in this chain which looks like
13 it's at 10:42 p.m. on January 4th -- although again there's a possible UTC issue where it
14 would be 5:42 -- there's an attachment titled, fraud in battleground States.

15 And if we scroll down -- and why don't you take a minute to scroll through the
16 attachment.

17 Mr. Burlingame. This is what he's --

18 The Witness. Okay. So is this -- is this the document on page 2, the --

19

BY [REDACTED]

20 Q Yes.

21 A -- evidence of fraud? Okay. Yep.

22 Q And if you want to --

23 Mr. Burlingame. Just so we're clear, yeah, so we're looking at exhibit 19, page 2,
24 which is, the heading is clear evidence of fraud in battleground States, [REDACTED]

25 [REDACTED] Correct. And that is in the email represented as the attachment

1 fraud in battleground States.

2 Mr. Burlingame. Got it. Thank you.

3 [REDACTED] You're welcome.

4 BY [REDACTED]

5 Q All set? Did you ever see this document, Mr. Bock?

6 A I believe I did see this document in passing.

7 Q Do you know where it came from aside from Ms. Michael?

8 A I don't believe that I -- I don't know. Or at least I don't recall.

9 Q Did you have any conversations with Mr. Worthington or Mr. Haley about
10 this document?

11 A I may have had a conversation. This would have been, you know, on
12 my -- you know, I believe it would've been on my White House computer, which I, you
13 know -- so I -- I don't -- I don't recall. It's possible that -- that Ross and Vince had
14 forwarded this to me to look at.

15 Q It's okay if you don't recall. This is -- all the questions are to the best of
16 your recollection. So it's --

17 A Okay.

18 Q -- it's okay. But do you remember -- now that you remember seeing it, do
19 you remember if you used this document in any way for fact-checking or research
20 purposes?

21 A I believe for -- I don't -- for research purposes, I believe it's possible that
22 could've, you know, used this document. When I'm trying to gather research for Ross
23 and Vince, I'm just trying to gather together, you know, everything that has been sent to
24 our office to put together into a product that -- that they can use. So it's -- I don't
25 believe that I would have relied on this document for fact-checking purposes.

1 Q Great. Thank you very much. All right. We'll stop sharing that. Okay.
2 And in general, what was your -- what was your understanding of what President
3 Trump's speech on January -- sorry, let me rephrase.

4 What was your understanding of the purpose of President Trump's speech on
5 January 6th?

6 A My understanding was just that -- that the speech would be about the 2020
7 election, that it would be about the President's concerns related to fraud and rules being
8 broken in regard to the 2020 election.

9 Q Did you believe that part of the purpose was to encourage Congress not to
10 certify the results of the 2020 election?

11 A I don't believe that was communicated to me. I would not -- in my
12 personal opinion, I -- I did not think that was the purpose of the speech.

13 Q At the time did you believe that there were enough votes in Congress to
14 prevent the certification of the election for President Biden?

15 A Did -- did I believe in -- you're asking for my personal opinion?

16 Q Correct.

17 A I did not believe there were.

18 Q Okay. So in your personal opinion, nothing that President Trump could
19 have said on January 6th would have changed the outcome of the certification of the
20 2020 election for President Biden?

21 A My personal opinion is just that the President's speech was about his
22 concerns with how the 2020 election had been conducted.

23 Q Correct. But in your personal opinion, was there anything that President
24 Trump could have said during his speech on January 6th that would've changed -- or
25 stopped Congress from certifying the vote for President Biden on that day?

1 A That would've stop -- that would've change -- I'm --

2 Q Yeah, let me rephrase.

3 In your personal opinion, was there anything President Trump could've talked
4 about that would've been an avenue to prevent Congress from certifying the 2020
5 election for President Biden?

6 A I don't -- I don't recall having a -- I don't -- I don't think so. I don't recall.
7 For me, you know, my personal opinion was just the speech was about problems that
8 occurred during the 2020 election and just talking about those.

9 Q So more of a forward-looking speech about fixing election issues than a
10 speech about changing the outcome of the current election?

11 A I -- that was my -- that would be my opinion.

12 Q Great. Thank you very much.

13 And from what you understood about the speech, did you think it was an official
14 speech or in the President's official role or a political speech, more akin to a campaign
15 speech?

16 A I -- I believe -- and you're asking again for my personal opinion, just to --
17 Mr. Burlingame. Yes.

18

BY [REDACTED]

19 Q From what you understood.

20 A From what I understood, I believe it would've been a campaign speech.

21 Q Great. Thank you.

22 And it's our understanding that Mr. Worthington was the lead drafter on the
23 January 6th speech. Were you aware of any direction that had been given to him about
24 how to draft the speech?

25 A Not that I -- not that I recall.

1 Q Do you remember any conversations in the White House about the -- about
2 the possibility of violence on January 6th in the early days of January 2021?

3 A I don't -- I don't remember any conversations to that effect.

4 Q Do you remember any conversations in the White House that involved
5 Members of Congress or their staff in the early days of 2021, about objecting to the
6 certification of electoral college votes on January 6th?

7 A I'm sorry. Can you -- can you repeat the question?

8 Q Yeah. Were you aware of any conversations with members -- with people
9 in the White House, involving Members of Congress or their staff, about objecting to the
10 certification of electoral college votes on January 6th?

11 A I don't -- I don't recall conversations between members -- members of the
12 White House to that effect.

13 Q Great. Thank you.

14 I'm going to show you exhibit 20, and I believe this is something that
15 Mr. Worthington or the National Archives has produced to us. So it might be better to
16 look at the lap- -- oh, no.

17 Mr. Burlingame. We got it.

18 [REDACTED] You got it. Sorry about that.

19 So, Mr. Bock, this is an email from yourself to Mr. Worthington on January 5th at, I
20 believe 6:44 p.m., and it's, you know, things we could add, and you're listing what looks
21 like some possible alleged voter fraud, some other possible arguments.

22 And if we scroll all the way down to --

23 Mr. Burlingame. [REDACTED], I'm just looking. Are you sure it's at 6:44 p.m. Eastern
24 Time?

25 [REDACTED] I'm not.

1 Mr. Burlingame. Okay.

2 ██████████ I think it might be earlier. So it's a possible UTC problem here.

3 Mr. Burlingame. All right.

4 ██████████ I think it's more --

5 Mr. Burlingame. I agree. That's why I asked it. There may be, I don't know,
6 but there may be a UTC issue here.

7 BY MR. SASSO. ██████████

8 Q Well, Mr. Bock, do you remember this email? Maybe you can help us with
9 the time.

10 A I -- I do remember this email.

11 Q Is it more likely that this email was sent around
12 1- -- whatever -- 1:40-something p.m. than 6-something p.m.?

13 A I -- I don't -- I don't remember.

14 Q That's okay.

15 A I just don't remember when the email -- sorry.

16 Q No, no problem. If we go down to page 3, though, you'll see that
17 Mr. Worthington emails to you on January 5th at 12:55 p.m., and it looks like -- and I'm
18 not going to ask you to read the whole thing, but feel free to skim it -- this looks like an
19 early draft of the January 6th speech. Do you know why Mr. Worthington sent this draft
20 to you at 12:55?

21 A I believe that it was so that I could review it for fact-checking purposes.

22 Q Great. And is that what your proposed additions and bullet points would
23 have constituted, your fact-check or other research responsibilities?

24 A It would not have been. The other bullets would not have been -- are you
25 referring to the things on page 1 and 2?

1 Q Yeah.

2 A Oh, that's not -- those aren't fact-checking comments.

3 Q Okay. So why did you provide these comments to Mr. Worthington then?

4 A This would've been just further research to support -- or inform the remarks
5 that, you know -- if he was looking for more examples to include. But this isn't -- this
6 isn't a fact-check of the remarks.

7 Q Understood. So, Mr. Bock, we're going to go through some drafts of the
8 January 6th speech and focus on some specific language as we go along. And again, if
9 you don't remember, it's okay, when I ask these questions.

10 So on exhibit 21, this is a 3:30 p.m. email from Mr. Worthington to Mr. Miller,
11 cc'ing Mr. Haley and Mr. Gabriel, with the subject Stop the Steal Rally and the attachment
12 Stop the Steal. Do you remember seeing this draft of the January 6th speech?

13 A I remember seeing a draft of the January 6th speech. I don't recall if it was
14 this exact --

15 Q Well, that's fine. If you don't recall this exact one, we can -- we'll move
16 along to one that I believe you did see, so.

17 [REDACTED] If that's okay with you, Mr. Burlingame --

18 Mr. Burlingame. Sure.

19 [REDACTED] -- we'll speed it up a little bit.

20 BY [REDACTED]

21 Q Exhibit 22 -- and this is one we received from NARA, so I think I'll wait for you
22 to get the laptop.

23 A Okay. Thanks.

24 Q Yeah. And I'll represent to you that this one does have a UTC problem.

25 So Mr. Worthington sends this email at 7:48 a.m. to a number of people, including

1 yourself, and it's attached, Save America March. And the message is, can everyone
2 please proofread, given the length and the turnaround time.

3 And if we scroll down, we'll see an attachment to this, which is a draft of the
4 speech. And then if we go to exhibit 23, which is also one that we created. So the
5 laptop is good for this unless you have it printed out. Let me know when you're there.

6 A I'm going to scroll down.

7 Q Are you on exhibit 23?

8 A Give me 1 second.

9 Q Sure.

10 A It's on the other page here. We're trying to -- sorry.

11 Q I'll start describing it to you. We looked at exhibit --

12 A Okay. I just pulled it up.

13 Q Okay, great. So we looked at exhibit 21 and exhibit 22. Exhibit 21 was
14 the draft attachment at 3:30 p.m. from Mr. Worthington. Exhibit 22, which is a
15 draft -- an email that you were on at 7:40 p.m. from Mr. Worthington, including a draft.

16 So this red line is something we created where the red strikeouts are language
17 from the 3:30 p.m. draft that did not make it in to the 7:40 p.m. draft.

18 And blue text is addition from the 7:40 p.m. draft that was not in the 3:30 p.m.
19 draft. Does that make sense?

20 A I think so.

21 Q Yeah. Do you remember reading over this, the 7:40 p.m. draft, to
22 proofread it?

23 A So -- sorry -- the 7:40 p.m. draft on January 5th?

24 Q Yes. The exhibit 22 one.

25 A Exhibit 22. I remember reading a draft of the January 6th remarks on

1 January 5th. I -- I can't tell you for certain it was -- I would -- I, you know -- but I can't tell
2 you for certain it was that one.

3 Q So okay. We will -- if we look at the first paragraph of this red line, so the
4 bottom line, our country has had enough. We will not take it anymore. Together we
5 will Stop the Steal. Do you know who drafted that language?

6 A We will not take it anymore -- I don't. I don't -- based off of my recollection
7 today, I don't. I don't know.

8 Q Okay. Were you aware of any discussions in the speechwriting office about
9 the theme Stop the Steal?

10 A I believe that the -- like, the words Stop the Steal may have been discussed in
11 relation to January 6th, but other than that, just, you know, like, a passing reference to,
12 like, you know, to the Stop the Steal Rally or something. That's -- that's what I recall.

13 Q So nothing more substantive about the phrase itself?

14 A No.

15 Q Thank you. And if we go to the second page of this red line -- oh, I'm sorry,
16 still on -- no, I was right -- second page of the red line. Confusing myself here. There's
17 a paragraph that starts in blue, now it is up to Congress to confront this egregious assault
18 on our democracy. We have come to demand that Congress do the right thing and only
19 certify the electors who have been lawfully slated.

20 Do you know who drafted the language about electors who have been lawfully
21 slated?

22 A I don't know. Or I don't -- yeah, I don't know.

23 Q Were there conversations in the speechwriting office on January 5th, or in
24 the earlier days of January, about lawfully slated electors coming from State legislators?

25 A Not that I recall.

1 Q Thank you. And if we go to the last page of this red line -- sorry, I realize I
2 have to scroll for you guys.

3 A This is page 11, is this?

4 Q Yeah. It's page 11, the last one of text, I should've said.

5 A Okay. Yeah.

6 Q And the second to last paragraph that begins, thank you again to every
7 citizen here today and all across the country for standing strong. Now it is up to the
8 men and women of Congress to do the right thing by their conscience, by their country,
9 and by our Constitution. So that's the language as represented on the 7:40 p.m. draft,
10 the blue text.

11 Now I'm going to read to you the red strikeout text, and you can follow along with
12 me. So the red strikeout will be how it was written in the 3:30 p.m. draft.

13 I want to thank you all once again for being here today. Now go make sure that
14 Congress hears your voice, sees your peaceful protest, and knows that here in this
15 country the American people rule.

16 Do you know why this concluding paragraph was changed, Mr. Bock?

17 A I do not. I do not know.

18 Q Were there any conversations in the speechwriting office about having the
19 President instruct people to march to the Capitol on January 6th?

20 A Not that I recall.

21 Q Did you hear any other discussions, or were you part of any other
22 discussions in the White House more broadly, about having the President instruct people
23 to march to the Capitol on January 6th?

24 A Not that I recall.

25 Q And I'll represent to you -- and if you want, you can look through the whole

1 thing -- Vice President Pence is not mentioned in this draft of the speech. Do you accept
2 that representation?

3 Mr. Burlingame. We do.

4 The Witness. So, sorry, which draft? Just to be -- in this?

5

BY [REDACTED]

6 Q In the red line. So he's not mentioned --

7 A In exhibit 23?

8 Q Right. So if he's not mentioned in the red line, it means he was not in the
9 3:30 p.m. draft or the 7:40 p.m. draft.

10 A Okay. Yeah.

11 Q Were there conversations in the speechwriting office about Vice President
12 Pence's role on January 6th? That you were aware of.

13 A That I -- that I was aware? I mean, about his role, not -- when you say
14 about his role, I don't remember conversations about his particular role.

15 Q Do you remember any conversations about what Vice President Pence might
16 do on January 6th?

17 A About what he might do, I don't recall conversations about what he might
18 do.

19 Q Do you recall any conversations about the Vice President at all in the early
20 days of January?

21 A I do.

22 Q And what were those conversations about --

23 A In the early days of January? I mean, yes, in the early days of January.

24 Q Yes. So what were those conversations about?

25 A This would've been -- the conversation I recall is after the speech

1 happened -- the January 6th speech happened. I remember expressing, as well as I
2 believe some others in the office, that we were not sure why the President had -- had
3 called out Vice President Pence.

4 Q Oh, I'm sorry. I'll let you finish.

5 A No, that's okay.

6 Q I was going to say, when you say called out Vice President Pence, do you
7 mean called out Vice President Pence during his Ellipse speech?

8 A Yes.

9 Q Thank you very much. So on January 6th, did you go into the office that
10 day?

11 A I did.

12 Q And about what time did you arrive?

13 A It would've been sometime in the morning, I think, around 9 in the morning,
14 around 9, I believe.

15 Q Were you aware of any further edits that were made to the January 6th
16 speech that morning?

17 A I remember being asked to proofread the remarks to look for, you know, if
18 any grammar changes need to be made or if there was a typo. I don't -- I don't recall if
19 there were other conversations, but there may have been.

20 Q Let's look at exhibit 27. I do not believe you are on this email, and it's
21 actually Mr. Worthington forwarding it -- forwarding it to himself on January 14th. But
22 the substance of the email, it's from Mr. Miller to Mr. Worthington and Mr. Haley and
23 Mr. Gabriel on the morning of January 6th at 10:22 a.m., starting --

24 Mr. Burlingame. So this is exhibit -- I'm sorry, [REDACTED] I interrupted. This is
25 exhibit 27, so we've got a copy of that one.

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BY [REDACTED]

Q Oh, great.

So the first email of the chain is January 6th at 10:22 p.m., and Mr. Miller says to Mr. Worthington, Mr. Haley, and Mr. Gabriel, start inputting these changes ASAP.

And then a minute later, Mr. Miller emails those three again, saying, then have a new version with red highlights marking POTUS edits, sent back to him ASAP as well.

And if we go down to the next page, it is the attachment to that email from Mr. Miller. Is this the draft that you were asked to proofread?

A I don't recall if this was the exact draft that I had been given to proofread.

Q Well, let's look at the bottom of page -- of page 1 of the attachment, so page 2 of the exhibit, and the blue text, starting with, today we will see whether Republicans stand strong for the integrity of our elections, and we will see whether Mike Pence enters history as a truly great and courageous leader.

And then it continues onto the next page. All he has to do is refer the illegally submitted electoral votes back to the States that were given false and fraudulent information where they want to recertify.

Do you remember reading this language before President Trump gave his speech?

A I don't recall reading that language.

Q That's completely fine. Did you go to the Ellipse rally on January 6th?

A I did not go down to the Ellipse, no.

Q Did you stay in your office?

A Yes.

Q And was your office located in the EEOB?

A It was.

Q Thank you. Did you listen or watch President Trump's speech that day?

1 A Yes.

2 Q Okay. So exhibit 31 -- and I'm doing this for efficiency purposes, but we can
3 go through the exhibits that it is redlining. So exhibit 29 is a draft of the final speech, as
4 we understood it was delivered to President Trump.

5 Exhibit 30 is a transcript of the speech as given that was put together by a
6 bipartisan Senate committee. And take your time quickly looking at those if you want.

7 And exhibit 31, which is the one I'm going to pull up in a second, is a red line that
8 we have generated where the text in blue is -- are additions that were made while
9 President Trump was delivering the speech versus what was written out to him before he
10 gave it. Does that make sense, Mr. Bock?

11 A That makes sense.

12 Q Great. So you can see -- actually, unfortunately, both the strikeouts and
13 the additions are in blue. But you can see that there's a lot of blue additions here, and I
14 don't want to go through all of them, but you did mention that you were surprised to
15 hear President Trump call out Vice President Pence.

16 So if we go to page 5 of the exhibit, we'll look at one of them. And here in the
17 second sentence, and Mike Pence is going to have to come through for us, and if he
18 doesn't, that will be a sad day for our country, because you're sworn to uphold our
19 Constitution.

20 And if we go all the way down to page 25 -- oh, we don't have a page 25. It's
21 towards the end -- I'm sorry -- should be page 20 -- I might have lost it in the shuffle.
22 One second. I apologize.

23 Mr. Burlingame. No worries.

24 BY

25 Q I think I meant page 2. So that is a great typo.

1 A No worries.

2 Q Okay.

3 So in the middle of the page, President Trump starts talking about Rudy doing a
4 great job, which I assume is Rudy Giuliani, and John Eastman doing a great job. And
5 Mr. Eastman had a conversation with Vice President Pence, and then President Trump
6 says, and he looked at Mike Pence, and I hope Mike is going to do the right thing. I hope
7 so, I hope so.

8 Because if Mike Pence does the right thing, we win the election. All he has to do,
9 all this is, this is from the number one -- or certainly one of the top constitutional lawyers
10 in our country -- he has the absolute right to do it.

11 Are these some of the lines that surprised you, Mr. Bock?

12 A I believe -- I believe so.

13 Q And can you -- do you remember who you were talking to after the speech
14 about President Trump's remarks regarding Vice President Pence?

15 A I believe it was Patrick MacDonnell.

16 Q Anybody else?

17 A I mean, we were -- I think we were in -- in the room watching -- in our office
18 watching the particular speech. There may have been other writers by us, but I think I
19 was -- I believe I was talking with Patrick. It may have been one of the other writers.

20 Q And besides surprise, was there anything more to your conversation about
21 what President Trump had said about Vice President Pence?

22 A Just that I -- I don't think I remember -- what I remember is just that I -- I
23 don't recall at all those things being in the draft of the speech that I had -- I had looked at.

24 Q Right. Thank you. And now if we go down to page 23, so my typos are
25 less bad. In the middle of the page, we have a short paragraph that begins with, and we

1 fight, we fight like hell, and if you don't fight like hell, you're not going to have a country
2 anymore. Were you surprised by hearing that language, Mr. Bock?

3 A I wouldn't -- I would just say my only -- that I -- I had not recalled that
4 language being in the draft that I had looked at.

5 Q Did the substance of the comments surprise you or bring any other reaction
6 out of you?

7 A Not -- not that I recall. Only that it just had not been in the -- what I had
8 looked at.

9 Q Okay. Thank you. And on the same page a little lower, we see, so we're
10 going to -- I'm sorry, I'll scroll down -- so we're going to, we're going to walk down
11 Pennsylvania Avenue. I love Pennsylvania Avenue. And we're going to the Capitol, and
12 we're going to try and get -- looks like something got cut off -- but a little lower down, it's,
13 so let's walk down Pennsylvania Avenue.

14 What was your reaction to hearing President Trump tell the people who were
15 listening to his speech that they were all going to walk to the Capitol together?

16 A I didn't have a particular reaction.

17 Q Was it ordinary for President Trump to tell his supporters that he would be
18 physically going somewhere with them?

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

20 Q But it didn't cross your mind as anything that stood out like the Vice
21 President Pence comments?

22 A That's correct.

23 Q Thank you. Did you ever speak with Mr. Stephen Miller about this
24 January 6th speech?

25 A Not that I recall.

1 Q And did you ever speak to President Trump about this speech after he
2 delivered it?

3 A I did not.

4 Q Thank you. When did you learn about the violence at the Capitol that day,
5 Mr. Bock?

6 A It would've been a few -- I don't know if it was an hour or so after the
7 President's remarks, but I -- I think someone was on Twitter and had mentioned that
8 there -- that violence was occurring.

9 Q Were you still in the office?

10 A Yes.

11 Q Did you have any conversations with anybody in the White House about
12 what President Trump should be doing in response to the violence?

13 A At that time or --

14 Q At that time, yes.

15 A At that time, I don't -- I don't recall conversations. We were all just
16 shocked that this was happening.

17 Q Did you think President Trump needed to make a statement of some sort to
18 condemn the violence and encourage it to stop?

19 Mr. Burlingame. At what point in time? Are we January 6th or --

20 [REDACTED] This is January -- sorry -- this is January 6th after Mr. Bock has learned
21 about the violence, so after the Ellipse speech.

22 Mr. Burlingame. Okay. Go ahead.

23 The Witness. I -- I did feel that it would -- it would be important for the
24 President to -- to make a statement. I don't remember -- or I did feel, you know, just
25 after the violence had occurred, I thought it would be important for the President to

1 address that.

2

3 Q And to your knowledge, did that view ever get conveyed to President
4 Trump? And not necessarily your personal view but the general idea that he should
5 make a statement?

6 A To my knowledge?

7 Q To your knowledge, correct.

8 A I don't really have knowledge that would pertain to what was conveyed to
9 President Trump.

10 Q Very fair. Thank you. And do you know if anybody -- do you remember
11 that Trump tweeted out a video at 4:17 p.m. on January 6th that instructed people to go
12 home?

13 A I recall the video.

14 Q Do you know if anybody in the speechwriting office helped draft those
15 remarks for the video?

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

17 Q Do you know who in the White House helped the President with those
18 remarks?

19 A I don't know.

20 Q Thank you. Did you work on a speech titled remarks on healing after
21 January 6th and before President Trump left office?

22 A I don't recall working on those remarks.

23 Q Thank you very much. And I just have a few more closing questions, so we
24 should be done here in a second.

25 Have you had any conversations with President Trump since January 6th outside

1 of your photo-op that you mentioned earlier?

2 A I have not.

3 Q Have you talked to anyone else who has been subpoenaed by the Select
4 Committee about their interactions with the Select Committee?

5 A I -- I have, yes.

6 Q Who?

7 Mr. Burlingame. Outside --

8

BY [REDACTED]

9 Q Outside of your lawyers, of course.

10 A Outside of my lawyers --

11 Q Yeah.

12 A I had a call, like, Patrick MacDonnell called me the other day just to catch up,
13 and he mentioned that -- that he had been subpoenaed, and I told him that I had been
14 subpoenaed. And he said it's -- it's nothing to worry about. That was -- that was
15 really -- that was our conversation.

16 Q Okay. I'm glad I left a lasting impression on Mr. MacDonnell. Last
17 question --

18 A I didn't mean it that way.

19 Q I'm kidding. Did anyone offer to help defray your legal costs, in responding
20 to the subpoena outside of, you know, friends or family?

21 A I'm not -- no, no. My -- my dad has just told me not to -- to worry about it.

22 Q That's very fair. Okay.

23 [REDACTED] I'll check with anybody -- any of my colleagues on the Webex, if they
24 have any follow-up.

25 Not seeing anything. Subject to -- unless, Mr. Burlingame, you have anything

1 else you want to add before we --

2 Mr. Burlingame. I do not, [REDACTED] Thanks.

3 [REDACTED] Subject to the call of the chair, we will adjourn in recess then.

4 [Whereupon, at 11:45 a.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.

Witness Name

Date