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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: KELLYE SORELLE

Wednesday, April 13, 2022

Washington, D.C.

The deposition in the above matter was held via Zoom, commencing at 10:09 a.m.

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2 Appearances:

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4

5 For the SELECT COMMITTEE TO INVESTIGATE

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

7

8 [REDACTED], INVESTIGATIVE COUNSEL

9 [REDACTED], INVESTIGATOR

10 [REDACTED], PROFESSIONAL STAFF MEMBER

11 [REDACTED], INVESTIGATIVE COUNSEL

12 [REDACTED], CHIEF CLERK

13 [REDACTED], SENIOR COUNSEL & SENIOR ADVISOR

14 [REDACTED], INVESTIGATIVE COUNSEL

15 [REDACTED], INVESTIGATIVE COUNSEL

16 [REDACTED], INVESTIGATIVE COUNSEL

1

2 [REDACTED]. All right. So we will go on the record at 10:09 a.m. eastern time.

3 Good morning. This is the deposition of Ms. Kellye SoRelle conducted by the
4 House Select Committee to Investigate the January 6th Attack on the United States
5 Capitol pursuant to House Resolution 503.

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

8 The Witness. Kellye SoRelle, S-o-R-e-l-l-e.

9 [REDACTED]. And I just want to confirm the R in your last name is capitalized,
10 correct?

11 The Witness. Correct.

12 [REDACTED]. Thank you, Ms. SoRelle.

13 This will be a staff-led deposition, and members of course may choose to also ask
14 questions.

15 In the room today, we have [REDACTED], who's me, investigative counsel.
16 We have Mr. [REDACTED], investigative counsel, Mr. [REDACTED], investigative
17 counsel. We have Mr. [REDACTED], investigative counsel. We have Ms. [REDACTED]
18 [REDACTED], who's an investigator. There are currently no members that are present.

19 Under the House deposition rules, neither committee members nor staff may
20 discuss the substance of testimony you provide today unless the committee approves the
21 release. You and your attorney will have an opportunity to review -- or you will have an
22 opportunity to review the transcript if you choose so.

23 Before we begin I'd like to describe a few ground rules.

24 So we will follow the House deposition rules that we provided to you previously.
25 Under the House deposition rules, counsel for other persons or government agencies may

1 not attend. You are permitted to have an attorney present as well.

2 I'd like to note for the record what has been previously marked as exhibit 1. It's
3 the subpoena for Ms. Kellye SoRelle, which is dated March 23rd, 2022. You are here for
4 this deposition pursuant to this subpoena. The House deposition rules are included in
5 this exhibit, and they were previously provided to you.

6 Do you have any questions about that, Ms. SoRelle?

7 The Witness. No, I don't.

8 [REDACTED]. Okay. There is an official reporter transcribing the record of this
9 deposition. Please wait until each question is completed before you begin your
10 response, and we'll try to wait until you finish your answer before we start our next
11 question.

12 The stenographer cannot record nonverbal responses, such as shaking your head,
13 so it's important that you answer each question with an audible, verbal response.

14 Ms. SoRelle, we know that you're an attorney, so I know that you know this
15 already, and if I see you shaking my head, I'll do my best to say positive response from the
16 witness or negative response. I know you already know how this goes from your
17 experiences.

18 We ask that you provide complete answers based on your best recollection. If
19 the question is not clear, please just ask us for a clarification. And if you do not know
20 the answer, please simply say so.

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

1 I also want to remind you that it's unlawful to deliberately provide false
2 information to Congress. Since this deposition is under oath, providing false information
3 could result in criminal penalties for perjury and/or providing false statements.

4 Do you understand that, Ms. SoRelle.

5 The Witness. Yes.

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

7 The Witness. Seriously? Sorry, I had to give you, like, sort of --

8 [REDACTED]. It's okay, it's okay.

9 [Laughter.]

10 The Witness. I'm standing. You just can't see me.

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

14 The Witness. Yes.

15 [REDACTED]. So, Ms. SoRelle, logistically speaking, please let us know if you
16 need any breaks throughout the day, and we'll do our best to accommodate them.

17 There may be several people asking you questions today. So, again, if you don't
18 understand a question, please just let us know, and we'll do our best to repeat it or to
19 clarify any uncertainty with the question.

20 So let's start with some background. Before we get started, you remember
21 meeting with us for an informal conversation back in January, correct?

22 The Witness. Yes.

23 [REDACTED]. Okay. So today's interview, like we said before we started, will
24 be very similar, a lot of similar topics. So we just wanted to make sure that you
25 remembered kind of what we talked about back in January.

1

2

EXAMINATION

3

BY [REDACTED]:

4

Q Can you please start with telling us the city and State you currently live in and what you do for a living?

6

A I am actually in -- well, I'm in Granbury, but right now I'm in Junction. And I'm a licensed attorney. I've been licensed in Texas since 2006. And I'm a former prosecutor; in private practice currently.

9

I worked on the border, the Texas-Mexico border. I've done task force work -- joint task force work with the Feds. And primarily my practice is focused around children.

12

Q Okay. So when did you leave being a prosecutor, again, to form your own practice?

13

14

A 20- -- end of 2017.

15

Q Okay. And you mentioned a little bit, but just so it's clear, what is your practice? What types of practice areas do you focus on?

16

17

A I've got criminal background. I've got family-related stuff background. So I pretty much do family, criminal --

19

Q Okay.

20

A I mean, just like some basic, whatever stuff. But, yeah.

21

Q And where is your practice based?

22

A Granbury and -- yeah, Granbury. Well, Texas, like, it's VFW, like, different areas, like --

23

24

Q Okay. And do you practice mostly under Texas State law, or do you do some Federal stuff as well?

25

1 A [Inaudible.]

2 Q Sorry. Can you repeat that? We missed it.

3 A State. I'm sorry.

4 Q Okay. Thank you.

5 [REDACTED]. I'm going to turn it over now to my colleague, [REDACTED], who I
6 think has some questions.

7 [REDACTED]. Hi, Ms. SoRelle. It's nice to see you again.

8 The Witness. Hello.

9 BY [REDACTED]:

10 Q So I wanted to just dive in with the Oath Keepers. And I was wondering if
11 you could start with telling us how you got involved with the Oath Keepers in the first
12 place.

13 A So in -- actually about 2 years ago, we -- basically, when the lockdowns
14 started, I was actually a city attorney at the time. I had the city attorney contract with
15 the firm that I was working with.

16 And I was sitting through some of the meetings, and I had some concerns with
17 some of the information that the Chamber of Commerce was bringing. And so I was
18 kind of relaying that to the other Republicans that were in the community.

19 And I just -- I didn't feel like the lockdowns were appropriate, not so much, like,
20 the masking, not so much, like, just the temporary lockdown. This was kind of after
21 that. This was -- we were doing meetings with the Governor, we were doing meetings
22 with, you know, the local leaders. And there were conference calls all the time.

23 And I just -- I just didn't agree that the lockdowns to the extent based off of the
24 fact that Walmart was okay, Home Depot was okay, Lowe's was okay, but mom-and-pops
25 weren't. And I just didn't agree with it.

1 And so I started kind of the anti-lockdown movement in Texas with some others,
2 and we actually did really great. We had Texas pretty open really fast.

3 And I met Oath Keepers through that, because they were protecting basically all of
4 us that were actually challenging -- constitutionally, by the way -- the lockdowns in Texas.
5 And that's how I got associated with Stewart Rhodes and all of them.

6 They were just -- they were basically security to make sure we didn't have issues,
7 which, in Austin, you do have issues. I mean, I know everybody wants to say it's an
8 imaginary antifa, you know, whatever, but the reality is, is they were there.

9 So that's what they were for, and that's how I got associated with the
10 organization -- loosely -- just because they were allowing us to start anti-lockdown rallies
11 and stuff like that.

12 And it was rallies. I mean, it wasn't -- we weren't overthrowing any capital in the
13 States, you know. I mean, we were behaving, can I say.

14 Q Got it. That's really helpful.

15 Was there a name for the anti-lockdown movement, or was there a group?

16 A It was really just a ragtag group. There were several Facebook groups that
17 popped up. But we were not really -- I'm trying to remember. Some people, like, had
18 names of pages and stuff like that, but it wasn't really anything -- like, there were no
19 organizations that I'm aware of popping into play.

20 There were doctors, like Dr. Lozano. You ended up with just doctors in Texas
21 who were trying alternative treatments. We were trying to give them a platform. We
22 were trying to get everybody out, off their butts, to just say, hey, you know, we need to
23 preserve our economy here.

24 So it was just whoever, and it was a ragtag group.

25 Q Got it. And did you run any of those Facebook groups?

1 A I didn't run any of the Facebook groups, but I was definitely contributing to a
2 lot of it.

3 Q Understood.

4 A We had lots of conference calls.

5 Q I'm sorry, I didn't catch that.

6 A We had lots of conference calls.

7 Q Got it. And did you or one of your co-organizers invite the Oath Keepers to
8 come, or did they show up at your events?

9 A So at the time -- I mean, if you look at Granbury and you know where
10 Stewart -- well, I -- he was living with a guy named John Shirley at the time who was with
11 the Oath Keepers. I knew John Shirley because he was elected official in Texas -- I mean,
12 in the county where I was at -- or where I'm at.

13 A And so basically we were challenging our local government at the time, and
14 because he was a local official that was on my side, I got pretty close to John Shirley at
15 that point. And then Stewart obviously was with him because Stewart was part of -- I
16 mean, was living at his house.

17 A So it was just kind of the association. We all just formed an alliance sort of, like,
18 here's what are we going to do kind of thing.

19 Q Got it. Did a lot of people get connected to the Oath Keepers like you did
20 during that time?

21 A Yeah. Yeah. Because you also have, like, the Texas State Militia. You
22 have -- which they were lending a hand. And you have some private groups that were
23 funded that kind of popped up that were security teams. You had all the different
24 health movements popping up. You had -- which they may have been organized. I'm
25 not a hundred -- like, you know, formally organized, I'm not really sure.

1 You had politicians, Allen West. You had, like, everybody kind of coming out of
2 the woodwork and joining forces.

3 So it wasn't so much that I could say that they were all, like, signing up for Oath
4 Keepers at that point, but I can say that we were all kind of running into each other.

5 Q Got it. And so is it fair to say that the early period of the COVID lockdowns
6 was kind of like a coalescing moment?

7 A Yeah. Yeah.

8 Q So fast-forwarding a little bit, and I'd just like to ask about the roles that
9 you've had with the Oath Keepers.

10 And the last time we talked, I think we had discussed that you were the interim
11 president of the organization at the time. Is that still the case?

12 A No. So the only time that I did that was basically right when he got
13 arrested, and it was basically, he was, like, here, babysit it, make sure nothing happens
14 crazy, and, you know, until we kind of formulate a plan.

15 So I was just temporarily, I don't know, maybe 3 weeks, just holding the org until
16 they could kind of get the board together and do some formal decisionmaking and stuff
17 like that.

18 Q Got it. Who is currently the president of the Oath Keepers?

19 A I have no earthly idea.

20 Q Do you have a current role with the Oath Keepers?

21 A I am -- I am there for -- it's very divided right now. So if they call me, they
22 call me. If they don't -- I've tried to tell them, like, just stay out of all this crap that's
23 happening because I kind of understand -- meeting with some former war
24 correspondents, I kind of understand what the hope or goal is of General Flynn. So I've
25 kind of just told them to stay out of stuff. I don't know. I mean, I've warned them.

1 Q Got it. Historically, what have the roles been that you've held in the Oath
2 Keepers?

3 A So I didn't actually really take on a formal role until after the 6th. I will say
4 that back in -- whenever Stewart was demonetized through Stripe, and I don't know if
5 that was around August, I didn't have much contact with Stewart over the summer.
6 After basically we reopened Texas, just everything kind of went pfft.

7 He got sick with COVID when he was in some State, and he called me. I got a
8 hold of the doctors here in Texas that were prescribing the stuff for him. I passed that
9 information.

10 And then I went -- he got back to Texas so he could get the prescription, and I
11 went over to make sure he had everything he needed, and then that was pretty much it.

12 So he was in a hotel, I don't know how long, in Texas, but he was receiving
13 treatment. But I went over there once just to check on him and make sure he had
14 whatever he needed, because I had been the one that had kind of organized him getting
15 in touch with the doctors. So I just followed up with him on that. But other than that,
16 that was the only contact I really had with him.

17 Oh, so that was, like, sometime late summer. I didn't really have any contact
18 with him after we kind of got Texas situated because he went -- I don't know where he
19 went.

20 But then fast-forward to August, September, somewhere in there, he called me
21 over a Stripes (sic) issue with the demonetization, and I went -- I sent a demand letter, I
22 think, or an email. But, I mean, it didn't go anywhere.

23 And so that was pretty much it again until I was in Detroit -- or pretty close to
24 when I went to Detroit. I told him I was going to Detroit. And it was more of a just, do
25 you have anybody up there? In the event that things go awry, right, is there anybody up

1 there that I can contact or communicate with if I need help or anything?

2 And it was actually more concerning -- well, let me just put it this way. When I
3 got to Detroit, it wasn't so much about that, just other than just saying, hey, I'm going to
4 Detroit.

5 But when I got to Detroit, the hotel we were staying in, we were on one floor, and
6 the floor below us was the DNC -- not that the DNC is an issue -- but also antifa was in
7 there, their heads. Then they drove these Jeep -- what are the new ones that came out?
8 Whatever. But they were busting out our windows in our rentals.

9 So were having issues every night, and everybody's cars were getting hit. And so
10 I called in just to say, hey, if we end up with any problems, and just, you know,
11 forewarning, or, may need help.

12 Q Got it. And we'll return to that. I think we will want to ask a couple
13 questions about Detroit.

14 But just going back to the roles that you had within the Oath Keepers, I think I've
15 seen that you've described yourself as the general counsel for the Oath Keepers.

16 A So after the 6th, when we were -- or -- yeah. We got back to Texas. And
17 we can go through all of that if you want. Basically, at that point Stewart and I -- all of
18 us actually, because we were just, like, what the hell just happened -- kind of basically, I
19 was, like, look, I'll just start digging in. Just, you know, like, assign me something and
20 we'll go.

21 And so I can't remember if there was some other reference before because they
22 had -- they were having -- they started having, after November's rallies, they started
23 having issues internally in the organization.

24 And I don't think -- I mean, I don't think I had any formal role. I didn't
25 really -- actually, I didn't really have anything to do with them that I can recall other than

1 just listening to everybody bitch. I mean, like, I don't recall doing anything for them
2 other than the Stripe stuff.

3 But I know after that is when we actually had a long conversation about, look, I'll
4 start trying to figure out what the heck's going on. Just give me something -- some
5 authority to do so. And I know he talked to some of his board members, and they said
6 go.

7 Q Got it. So you took on that role after January 6th?

8 A Yeah, because we just didn't know what the hell had happened. I mean,
9 contrary to everybody's narrative, there's a lot of evidence actually to the contrary of the
10 narrative, so -- which is a trial proceeding, I get. But I'm just saying, there's a lot of
11 problems we're having and seeing coming up.

12 Q Got it. And we will definitely go into that.

13 But returning to the organizational structure, you mentioned that there's some
14 disagreement now over who's running the organization. Can you talk about that?

15 A I -- so -- I'm sorry. There originally was a couple of guys that he had chosen
16 that I know were supposed to. And it was Chad Rogers, and I cannot -- PK out of
17 Wyoming, I think, Colorado, somewhere up there.

18 Q Sorry, I didn't catch that second name.

19 A It's PK, and I cannot for the life of me think of -- because everybody's under
20 an initial thing. So I can't think of his actual name, which is bad. But those were the
21 ones he originally had decided that he was going to use.

22 And then they both ultimately, I think, declined it. And so then I think it may be
23 John Siemens out of Texas, maybe, currently, but I don't even know that that's working
24 either because when I was telling them to stay out of crap, he booted me from the chat.
25 So it's like -- and then everybody was, like, messaging me on the side.

1 So I don't know -- I don't know. I haven't -- they're [makes sound]. I mean, it's
2 like I told you guys during one of the things, I was like, look, this thing's so backed up and
3 messed up, like, [makes sound], you know, move on.

4 Q Got it. And who is John Siemens?

5 A He's a former, he's a colonel, because I know he's Colonel John Siemens, and
6 he's out of the San Antonio area, but that's about all I know of him. He also has a
7 nickname of Big Bird.

8 Q Okay. I'm sorry. You said his nickname was Big Bird?

9 A Yes.

10 Q Okay. During the time that you were involved with the Oath Keepers, do
11 you remember any of the other names of people who were on the board?

12 A Oh, there's a list of them. So they're not accurate because people had quit.
13 But there is the guy out of Montana who has the shop that I know everybody was, like,
14 hung up on. Sorry, I'm googling for names now.

15 Q Is that Greg McWhirter?

16 A Yes, Greg McWhirter, thank you. See, here's the thing, I recognize
17 everybody's faces. I am not a name person, like, I'm just not, like. So I apologize.

18 Q It's okay.

19 A They don't stick in my --

20 Q To the best of your recollection.

21 A Greg McWhirter, yes.

22 Q Anyone else?

23 A There is a female. Natalie? I think of the singer Natalie Imbruglia, but I
24 know that's not it. So that chick. And I know that Stewart had a conversation with her
25 at some point, and I was there for that. And then you had Greg.

1 And those were pretty much the only ones, after John Shirley left, those were the
2 only ones really that I ever really talked to or interacted with.

3 Q Got it. In terms of, like, the actual legal structure of the organization, do
4 you know if any of those people or anyone else was a corporate officer of the
5 organization?

6 A I don't. And I know -- and I know that's one of the things he's getting
7 dinged with. And honestly I didn't like his view of what he had for a nonprofit out of
8 Nevada, but we didn't really go into that so much. I just was, like, no, sorry, dude. So I
9 don't know.

10 No. I mean, I don't know -- I didn't study any of their stuff. I literally -- if
11 anything, you could say I was general counsel for the limited purpose of trying to figure
12 out what the hell happened on the 6th, or after the 6th, or during the 6th, or before the
13 6th, or any of that crap.

14 So, I mean, I was literally only focused on that stuff, and then -- I mean, things just
15 kind of deteriorated over time. So it was like a very specific role I was trying to ascertain
16 or achieve.

17 Q Got it. Understood.

18 A Figuring out.

19 Q Do you have a sense of what Mr. Rhodes' role is now in the Oath Keepers?

20 A I don't think -- I mean, I think he's still, like, a founder as far as, like, he's
21 got -- I don't think he's out, because I think Big Bird or Siemens, if he's operating under
22 something, but some of the guys sent me a document they said they don't believe it's
23 legitimate, that it was basically just a power of attorney for Mr. Rhodes, which is what he
24 was trying to operate with me quickly.

25 We didn't fully get it done, but he was telling his guys that's what he was doing

1 because that was just -- so my concern was when -- and I told Stewart this at the very
2 beginning -- and so just so you know, I don't have much contact with him.

3 I told him, pretty much after he got arrested and the first time I met with his
4 attorneys in Dallas, that I did not agree, and I thought they were all conflicted because I
5 did not think that Sidney Powell had any business funding anything, considering I thought
6 she was a major key factor in actually planning and orchestrating the event.

7 And I had concerns with her funding defense for any of the Oath Keepers actually,
8 including Scott Moseley (ph), and I was very vocal about that. And I basically told him
9 that if this was the route he was going to go, I was not going to get ensnared in any of
10 their bullshit, because I've not done that so far and I refuse to do it now. Sorry.

11 Q Got it. Do you have a sense of why Sidney Powell would be funding the
12 Oath Keepers' defense?

13 A Yeah. You want to control the money and control -- make sure that -- I
14 mean, here's the thing. It's unethical as hell, but the reality is, is I think that she's trying
15 to find counsel that will be more interested in keeping their income flowing than actually
16 doing their job.

17 Q Got it.

18 A That's just my opinion.

19 Q So I wanted to ask a couple of questions about the structure of the Oath
20 Keepers to the extent that you were aware of it. And I understand that your
21 involvement as general counsel may have been relatively limited. But I'm just going to
22 go through these questions, and if you don't know the answer, just say so.

23 But can you tell us about how the organization is structured in terms of a national
24 chapter or national leadership and State chapters?

25 A Okay. So that is one of the issues that I was trying to ascertain in there.

1 So when I was telling you that before there was actually, like, any formal
2 discussion of stuff, there were people contacting me after November and December
3 trying to get the same thing ascertained. And so that's where -- so Stewart was just,
4 like, I don't know, Kellye and I will talk about it.

5 Just more of the fact that because I had helped him with the Stripe stuff, he was,
6 like, look, I'll -- we'll sit down, we'll see what we can figure out. Because there were
7 people that were just contacting me because I was an attorney, trying to figure out what
8 their, like, exact roles were, like, as far as things were concerned.

9 And so I met a lot of the guys, just so you know, because it sounds weird, but
10 there were group chats that were created that were just what we called intel. They
11 didn't go into any of the specifics of the rallies or any of that stuff. It was just, they were
12 giving me data.

13 They helped me actually. They helped me find addresses for people. That's
14 how I got a hold of -- not addresses -- phone numbers for, like, Harry Hari (ph) -- no -- Hari
15 Hershey (ph). I'm going to mess all of these up.

16 Hari Hershey (ph) I spoke with at the November rally actually, but I did it over the
17 phone. But they were the ones that were, like, basically connecting me to different
18 people that would have information because I wasn't necessarily going with the Dominion
19 crap at the beginning -- and I actually never did -- but it was because it just wasn't
20 matching stuff.

21 So I was trying to seek information to get different theories of why they were
22 saying what they were saying or to understand the systems better, I guess. So I ended
23 up talking to Hari Hershey (ph).

24 And so anytime I needed something, they were able to get me contact
25 information. So I kind of became an attorney associated, I guess, with them at that

1 point, but it was more of they were helping me.

2 And then fast-forward, some of them started having issues. And then so I was
3 getting contacted from them, asking questions about, like, just org roles and stuff like
4 that.

5 So there was kind of, like, this weird little bubble. They started asking, I would
6 just kind of redirect them back to Stewart, and I would tell Stewart, hey, I was contacted,
7 here's the issue, you guys need to go figure that out.

8 But as far as what I understand about the roles is that national has overhead
9 projects that they'll work on, and that would be things like hurricanes, like, because they
10 did Hurricane Katrina. There was some -- I know there's been, like, some tornado relief.
11 They've done rallies.

12 Obviously, they've got their more controversial things that they've done which
13 was, like, a -- was it -- well, you've got Louisville, but I think it was St. Louis maybe -- or
14 Ferguson. You've got Ferguson.

15 So I know they've got their more controversial ones, but other than that, I know
16 that they were also doing, like, local events or relief efforts and things like that. I
17 know -- I think they went to, like, I don't know, Puerto Rico or something, I don't know.

18 But as far as I can tell, there was this overarching, if we're doing a giant project,
19 here's what we're doing, here's what the thing is. And I saw Stewart would, like, kind of
20 do, like, callouts basically.

21 Like, here's the project we're going to work on, you're welcome to sign up, here's
22 where it is, here's what we're going to do, blah, blah, blah.

23 Okay. So then chapters would do their own thing too. Stewart's role that I can
24 tell or the chain of command I can tell off of that is that basically they would notify him of
25 any activity they were doing in a specific -- like, if they were doing something in Florida,

1 he would just get, like, a message from them, saying, hey, this is what we're going to do.

2 And if it was something that he felt like he needed to engage in, he would engage
3 in it or help them. They would do, like, a conference call or some type of phone call.

4 And I can only really tell that because I started digging into their stuff. So it looks
5 to me as if that's what they were doing, was, if there was something, like a rally or
6 something like that, you would have him communicating with them.

7 He would decide whether it was a national function or whether it was a local
8 function. As long as they kept him in the loop of what they were doing, that was okay.

9 And he didn't have, like, control over it. I mean, I can't tell -- there wasn't
10 anything, like, well, at, you know, 2 o'clock, make sure you do this. It was just, okay, just
11 keep me in the loop as far as, like, what you're planning, so that he wasn't bombarded
12 with any surprises.

13 That's what it appears to be. And that was kind of, like, the understanding just in
14 communicating with different people throughout the time.

15 Q Got it. That's really helpful.

16 Do you have a sense of how deferential local chapters would be to Mr. Rhodes?

17 A I would -- well, see, that's kind of where it starts getting into being an issue,
18 is because, like I said, in November -- all right. I was there for the November rally, right,
19 the Stop the Steal series in D.C. I was there for all of the arguments, kind of, that
20 ensued after that. That was another place where I was just, like, okay, guys.

21 Based on general rule of thumb, I would say it should've been, if you're doing
22 stuff, notify Stewart.

23 The thing that happened is actually you had, like, these rogue elements -- and I
24 will say North Carolina, Florida, probably some South Carolina, probably some Ohio, some
25 Alabama maybe, definitely Virginia -- you had this little bubble that was forming that was

1 kind of -- Doug Smith seemed to be kind of trying to extrapolate those chapters and trying
2 to form a new organization.

3 There was still communication with Stewart, like, I'm doing this, but it also seems
4 that there was communication with North Carolina too. And Doug Smith comes out of
5 North Carolina. And that's the one that ultimately breaks off the end of December.

6 And so in hindsight, looking back, because this was not stuff that I know I was
7 aware of or that really Stewart was aware of -- I knew he knew he had issues, and I knew
8 there was, like, boy drama. And by that, I'm saying there was the, you know,
9 chest-pounding. I'm trying to think of how to nicely say what guys do.

10 But it seems to me you had two layers of activity going on, right? You had some
11 that was where they were still kind of maintaining contact with Stewart. But then you
12 had a whole separate plan developing. And I don't mean going to overthrow the U.S.
13 Government. I'm just saying a separate chapter's plan appearing to emerge after
14 November.

15 Q Got it. And you saw Doug Smith as the leader of that emerging faction?

16 A So when I was -- after I left Detroit and when we were headed to the first
17 D.C. rally, the South Carolina, North Carolina, Alabama, that group, was going to come
18 into play, the same -- ironically, it's the same actors, which is strange.

19 But all of them were kind of doing a rally point at Doug's. And I went -- instead
20 of going straight to D.C., I went to -- and I was with Jeff Morelock and Whip. Well, Whip
21 goes to Indiana to check on his kid, but then he comes down and meets us. But I was
22 with him in Detroit.

23 Jeff and I take off. We drive in Jeff's truck from Detroit to North Carolina. And
24 Whip leaves us and heads to Indianapolis and then comes back down to North Carolina to
25 meet us there. And that becomes, like, the rally point for everybody to kind of caravan

1 up to D.C.

2 So that's what happened before the November rally. So I've met Doug, I know
3 Doug, I've stayed at Doug's house. But after that's when everything kind of got severed.

4 So I was at Doug's house for a few days, and then post-November -- as a matter of
5 fact, I took a smaller suitcase from Doug's, and I had hell getting my suitcase back
6 because I had broken down into a smaller bag to go up to D.C.

7 And then because of everything that happened, some of the guys from South
8 Carolina go to Doug's to get my suitcase to meet me in Atlanta.

9 So there was, like, this weird thing going on. So, yeah, I mean, there was, like,
10 this split off. But I was -- I stayed at Doug's house.

11 I mean, I can't say Doug's a bad person, is what I'm saying, like. But that was just
12 kind of the rendezvous point or rally point or whatever.

13 Q Got it. I understand.

14 Do you have a sense of what the disagreements were that led to Doug and some
15 of the other chapters breaking away from Stewart?

16 A I don't really understand, other than that chest-pounding stuff at the -- so
17 what happened in November was, we stayed at Caldwell's -- well, no, I didn't. I stayed
18 at some other people's -- some RNC, GOP people in Virginia's house. But the group
19 stayed at Caldwell's farm? Somebody's farm, Crowell, Caldwell, one of them.

20 We went over there and had a dinner. The boys actually were -- and this is not
21 to sound scary because there was no discussion of anything crazy, but this is where the
22 map scenario comes into play.

23 Hold on just a second. I'm going to get my kitty cat out of here because, yes, I
24 had to travel with a cat.

25 No, you're not getting in my lap. Maybe I'll have a cat. Sorry.

1 Q No worries.

2 A I've got my cat with me. And then my mom's dogs are here.

3 [REDACTED]. We are not opposed to having a cat on the screen while you talk
4 to us, Ms. SoRelle.

5 BY [REDACTED]:

6 Q I've got my cat sleeping in the background, so she might wake up at some
7 point.

8 A I'm sorry. She wants attention.

9 So we were in -- I'll go with the night before the November rally, we were at the
10 farm. We had, like, a cookout. All the guys met there, they all brought their camping
11 gear. You had guys with, like, I don't know, pop-up type camper things. You had
12 people just camping out. You had a little bit of everything.

13 And then there was, like, a couple of barns on there. In one of the barns they, I
14 know -- because I hadn't really thought about this until actually I was talking to one of the
15 guys who did an article -- there was a, like, I guess where Caldwell or Crowell or one of
16 them had done, like, maps of the city.

17 But it was not maps, like, here's where the tunnels are -- that I'm aware of -- or
18 anything crazy like that. It was just, like, here's where they're blocking off areas for the
19 rally, so that you know which streets you can enter on, which ones are drivable, which
20 ones are, you know, maneuverable.

21 So I know they, like, go into one of the barns, and I know they're discussing that
22 stuff. And I know they're talking QRF, but it's not the QRF that later gets described.
23 It's more, like, if we need to get people out, if there's issues in the rally, here's where you
24 can go through, here's the different, like, ways to get out, right?

25 And that was one of the things -- it was really great actually that I kind of talked to

1 a couple war correspondents because they got to explain some of the lingo that I didn't
2 even really understand.

3 But that's what it is, is they're planning, like -- and I watch it, so I'm, like, I don't
4 see anything scary about it. I don't see them advocating anything dangerous. I'm
5 listening to them talk about, if you're going to go have to get people that are -- I mean,
6 come on, these Oath Keeper guys are, like, old. I mean, let's be real. They're old.

7 And so it's, like, I'm watching, you know, old guys talk about, like, if somebody
8 can't get out because they're tired, how do we get them out, right? And then it turns
9 into overthrowing the government. I'm like, what? Okay.

10 But that's what I'm watching in November, is I'm seeing them with maps. I'm
11 seeing them discuss whether they're wearing plate carriers or, you know, looking at laws.
12 If they ask me a legal question, I pull up some code. I, like, tell them this. You know,
13 that's how it worked.

14 But I was, like, literally just kind of, like, chilling my hamburger, playing on my cell
15 phone while they were doing their stuff. You know, like, I was kind of, like, okay,
16 whatever.

17 But I didn't hear anything violent or volatile, like they're going to go kill people or
18 anything like that. It was just, like, basic planning for rallies, or whatever, their security
19 details.

20 But fast-forward to the actual rally day -- the next day actually -- you get --

21 Q And this is still in November?

22 A This is the November rally. So the November rally -- because you were
23 asking how, like, they kind of had an issue or whatever happened. I stayed at those
24 other people's house with -- and Jeff Morelock and myself get up, we get in the
25 rental -- actually, it's Whip's car, I lie.

1 We get in Whip's car, we drive to D.C., and we park out. I have a conversation
2 with Hari Hershey (ph). We're running late because I don't want to get too close to the
3 crowd because I'm trying to stay on the phone.

4 But we get there just in time, and it's at the plaza where everything by the -- I
5 think it's by the Willard, like the Freedom Plaza or whatever.

6 Q Yeah.

7 A It was probably the rally point.

8 So we get there just in time. They're talking to Stewart. Stewart is having a
9 conniption fit because they're running super late, and everything that could go wrong on
10 their side has gone wrong. And so literally there's, like, a handful of us that get there in
11 time.

12 And there's some guys, like, John Shirley and some others that had actually stayed
13 in D.C. overnight. So we catch up with them, right, but we don't catch up with Stewart
14 and all of them because they're running super late, and everything that could go wrong
15 has gone wrong on that end.

16 So we catch up with Proud Boys and Alex Jones and all the speakers they were
17 supposed to be working with, which was Charlene Bollinger and the -- Marsha Lessard
18 and the different Freedom Keeper groups and them. Okay.

19 So we get in the little pack. We're all kind of, like, shuffled through. We stay
20 with that group the entire time. There's nobody else there.

21 And then -- I mean, there's, like, just those speakers in a block. And then you've
22 got, like, Proud Boys kind of forming, like, a little block perimeter. And then you have
23 got, like, Oath Keepers kind of scattered amongst them. But there's -- I don't know how
24 many are actually there because I can't really identify who's what or which at that point.

25 Cat, what is your problem?

1 Can I mute for a second to get the cat food? I think that's why --

2 Q Sure.

3 A I think that's why my cat is having a convulsion fit. He wants breakfast.

4 Hold on.

5 Q We can recess in place for a minute.

6 [Recess.]

7 [REDACTED] Let's go back on the record.

8 So we were talking about the November rally and how that led to a split in the
9 relationship between Doug Smith and Stewart Rhodes.

10 The Witness. Okay. So basically we do the rally stuff. We get to the Supreme
11 Court. That's where the little stage is. Everybody's doing their thing.

12 There are some agitators off to the side. We kind of get funneled through. We
13 get to the end.

14 Stewart and all of them are, like, incredibly behind us, so we actually kind of, like,
15 basically cut and go a different way to try to meet up with the group.

16 But at the same time when I'm heading that way to try to find the rest of the Oath
17 Keepers, I end up getting a call from John Shirley because they're having issues.

18 John Shirley was LEOSA certified, so he could carry in D.C. And so the hotel -- he
19 wasn't carrying during the rally, but the hotel had been in his room and found his
20 weapon, and I guess they had called law enforcement. Well, I know they did.

21 And -- or, well, I get there as everything's okay, and John Shirley's calling me,
22 saying, they had just validated, like, verified who he was, it wasn't going to be an issue.

23 But I was already at the hotel, so I went on up, checked his room, made sure
24 everything was okay because he was, like, look, you know, you're over there, can you just
25 go check and make sure everything's okay in my room. It was fine.

1 Well, when we leave there -- and he was staying off of BLM Plaza, like, behind the
2 Capitol -- and so when we're leaving there, that was kind of, like, where I -- I was with Jeff
3 Morelock and with Mike Greene. And that's when we got to see, like, the pepper
4 spraying and all that stuff that was going on with the Trump supporters.

5 And they were actually kind of pretty hostile to law enforcement actually. But
6 law enforcement kind of was, like, trying to form, like, a little line, to, like, let us get out of
7 there. And we got out. I was watching -- I was trying to record it actually. I did a
8 really horrible job because Jeff and Whip were not being cooperative with me trying to
9 record.

10 But we get out, we get to the end, and then we start turning Trump supporters
11 around so that they don't end up in that mess. And there's videos of that, like, even if
12 everybody wants to deny that that existed, like, it -- there's videos that, like, were --

13 [REDACTED] Ms. SoRelle? Ms. SoRelle, I don't want to give away too much,
14 but we are going to get into this November rally in much more detail a little later.

15 So can you just let us know, as succinctly as possible, what the disagreement
16 between -- is Ranger Doug right? -- Ranger Doug and Mr. Rhodes was?

17 The Witness. So that was -- and that was the reason I was telling the story is
18 because that's absolutely what it was over. Because by the time we get out of there and
19 we redirect people and we finally catch up to Stewart and them, it's at the Willard.

20 And my understanding, from the conversation of the guys when we got there, was
21 that Stewart and them wanted to go out and do what we had just been doing, and Doug
22 and them didn't think it was safe.

23 And there was -- basically he said, I'm loading up and I'm taking my toys and we're
24 going home. You know, we're taking our crew and all of our, whatever, plate carriers or
25 whatever gear they had with them, I don't know. It wasn't guns.

1 But they were basically saying, we're out of here, we're not going to get involved
2 with this garbage. And Stewart was, like, actually trying to get a group to go out to help
3 us.

4 So that's why I was telling that part of the story is because that is my
5 understanding of what the breakdown was over, was because there were three of us out
6 there redirecting people while they all went to the Willard and chilled out?

7 BY ██████████:

8 Q Got it.

9 A And actually had a fight and broke up and whatever.

10 So, anyway, I get back to the Willard. That's -- and that was pretty much what I
11 was told.

12 And then I know after that, from looking at stuff and from actually talking to a
13 couple of the guys when we get to Atlanta, that that's become a bone of contention
14 between all of them.

15 Q Understood. That's helpful context. And like ██████████ said, we're
16 going to get to the November rally in a little bit more detail. But I wanted to stick on
17 kind of background questions to learn a little bit more about the Oath Keepers.

18 So I'll just kind of step back for a little bit and ask you, based off of your
19 experience, you know, who is the Oath Keepers' target audience? I know you've kind of
20 described the membership a little bit, but if you could speak about what you know about
21 the organization and who they try to recruit.

22 A So the people that I've interacted with -- I can't talk about, like, general
23 membership because -- I mean, other than just, like, group chats and stuff like that, that's
24 pretty much been the only, like -- you know.

25 But the ones that I interact with -- and actually in Texas, a lot of them that were

1 kind of crossing over between the different militia groups in Texas -- were all either
2 former or current law enforcement. They all had some type of military background
3 or -- I mean, there's Federal, former Federal agents in there. There's -- as a matter of
4 fact, the FBI -- former FBI guys that were in there, like, I absolutely adore them. But
5 that's -- that's it.

6 It's basically just law enforcement, military, first responders, because you had,
7 like, EMT types, like emergency -- first responders, like, I mean, it's really what it is, and
8 military.

9 But there was actually some doctors in there too, but they were also -- had the
10 same military background. But I mean --

11 Q And what's your sense of kind of what the purpose or mission of the Oath
12 Keepers is?

13 A Community. Taking care of your community. I mean, that -- that's pretty
14 much -- even -- even just in the, like, even -- with our -- with our lockdown stuff, right, I
15 mean, that was -- they were just surprised -- they were just providing support for those of
16 us that were trying to exercise our First Amendment and our constitutional protections.

17 So what Texas, how we were defeating it, there was one -- you had legal
18 challenges to this governor's order. I'm telling you this just so that you understand. It
19 was all based off of legal framework. So it was, like, I was using our inherent power
20 provision for our Constitution, and I was using some of the law against them, right, for
21 what they were doing.

22 And so all Stewart was doing in that was providing me an ability to have a
23 platform without feeling intimidated by others. And that could be general public that
24 didn't understand or trust it.

25 I'm not saying I'm right. I'm not trying to make an assessment on that. But

1 what I'm trying to say is that all they were doing was allowing me to exercise my First
2 Amendment right and everybody else who was trying to stand up at that point. That
3 was their role.

4 Q Got it. And did you see that role kind of evolving as the year went on in
5 2020?

6 A Not at all. It never changed, not once. And that's why this narrative is
7 bullshit.

8 Q Got it.

9 Do you have a sense of kind of the purpose behind the Oath Keepers' summer
10 2020, fall of 2020 security efforts? Is it what you were talking about just now?

11 A It's community support. It's basically if there's -- so because our political
12 establishment has created these really divisive narratives, it's hard to ascertain and
13 it's difficult because I've had to stop and sit back and look at it from both sides'
14 perspective, right?

15 The narratives were dangerous on the parties' parts because all they were doing
16 was inciting. And so all Stewart was really truly trying to do -- and this is conversation
17 with all of them, okay? This is not just -- this is [audio malfunction].

18 [REDACTED]. Ms. SoRelle, I think we lost connection with you unless I'm the
19 one with the bad connection.

20 [REDACTED]. I can hear you, [REDACTED] -- or sorry, [REDACTED].

21 [REDACTED]. Yeah, she froze.

22 [REDACTED]. Okay.

23 Ms. SoRelle, can you hear me? If you can, you're frozen on our screen. We'll
24 go off the record for a minute while we try to sort this out.

25 [Recess.]

1 [REDACTED]. We'll go back on the record at 11:01 eastern.

2 BY [REDACTED]:

3 Q So I think we were talking about the summer of 2020, fall of 2020 security
4 efforts.

5 A Okay. So as far as I can tell -- oh, what is wrong with the internet? Can
6 you still hear me?

7 Q Yes.

8 A Weird. As far -- so as far as everything I'm aware of from listening to the
9 groups -- but, see, I wasn't really around during the fall. And I do have to say that
10 because I didn't really have a lot of interaction with them after we did the "Open Texas"
11 stuff. There was, like I said, there was, like, a break there where I really don't know
12 what the org did.

13 Now, I listened to them later refer back to stuff, but I don't -- I wasn't around
14 during any of that for the, like, the later part of the summer and the fall, other than when
15 we -- when I get to Detroit. Like, there's, like, a break period there.

16 So I don't really have any interaction with the group at large, but my
17 understanding is that they're just there as, like, community support.

18 Q Got it. And did they have any kind of formalized relationship with law
19 enforcement?

20 A So in -- I know in Katrina and -- I know that every time they go and do
21 something, I've heard them talk about, even with the rallies or even with any of that stuff,
22 I've heard them refer to who's contacting local law enforcement to let them know we're
23 there, not an issue, you know, like, just -- just so that there's not a problem.

24 And they did that over the summer with the Texas, like, anti-lockdown rallies. I
25 know, like, when they were going to Dallas or whatever -- or we were going to Dallas -- I

1 know that's what they were saying, was just make sure that the local law enforcement
2 knows, so they know we're not hostile, we're not doing anything, we're just here to
3 participate in this event.

4 We did a Dallas rally too that nobody's even talked about in the Stop the Steal
5 series that was in, maybe, early December, like, the first week of December. And I know
6 they did one in Austin, I think, somewhere in there. I didn't go to that one.

7 But I did go to the Dallas one, but I was there when they were talking to law
8 enforcement for that one too, just -- and I don't know -- I mean, I can't tell you who they
9 reached out to. I don't know if it was a sheriff. I don't know if it was just, like, you
10 know, calling the PD. I don't -- I don't know because I don't really -- I wasn't really
11 paying that much of attention.

12 But I was hearing them say, yes, I called so and so, this is what. And I'm like, oh,
13 okay, you know, like, great.

14 So none of it to me, the whole point of it is, none of it to me indicated that it was,
15 like, hostile or that they were doing anything to scare anyone. They were just -- I mean,
16 they let them know, here's the event, this is what we're going to do, here's going to
17 be -- you know, we're here, we're just there to make sure the attendees are protected,
18 and that's it. I mean, that was it.

19 Q Got it.

20 A That was all I knew.

21 Q Got it. And do you have a sense of whether there was any more
22 coordination beyond then during the actual event?

23 A No. No. But I do know if there was law enforcement there at an event,
24 the guys would talk. I mean, because like I said, these guys were all former law
25 enforcement and stuff like that, right? So it's not, like, let's go be, you know, crazy,

1 whatever.

2 Like, they're pretty generally pretty pro-law enforcement actually, and so you
3 would see them kind of rally behind, like, DPS troopers in Austin. Like, I would, like, find
4 the guys, like, congregating over to the side with, like, all the DPS guys, like, chatting and
5 stuff.

6 And so it'd just be, like, that's just the way it was, is it was just -- I don't want to
7 say a brotherhood, but it's just, like, you know, like, that's what these guys all are, you
8 know. And that's what DPS, that's what, like, most of the guys that are active duty
9 anything, all come from the same background, so, like, they're all just the same people.

10 Q Understood.

11 A And I've worked with them my -- I've worked with them my entire career
12 too, so it's not even -- to me, like, I'm, like, ooh, why are they playing with law
13 enforcement. I mean, like, this is -- when you're a prosecutor, that's what you do. So
14 it's just -- it's that group.

15 Q Yeah. That's really helpful context.

16 To your knowledge, did the Oath Keepers or Mr. Rhodes have any relationships
17 with anyone in the White House or anyone in Congress?

18 A I know there were a couple of people that were more associated.

19 So, I know that Stewart had worked for Ron Paul, right? And I know there -- like,
20 Louie Gohmert, like, there -- it's -- it's, like, the loose associations of what's left over of,
21 like, more of that Tea Party type, right?

22 So it's -- it's the same group. I mean, so I can't -- I can't tell you who all -- like, I
23 know, I've been -- I went to Louie Gohmert's birthday party, like, I mean, it's -- it is what it
24 is. So they're just these, whatever, the freedom group.

25 Q Sure. And what was Stewart's relationship with Louie Gohmert?

1 A Just the loose association. So the same with, like, Allen West and all of
2 them, is it's just these groups that -- that are -- it's a small world. That's the reality, it's a
3 small world, and so even if you don't have a direct correlation, it's, like, six degrees of
4 separation, right? Like, everybody's got some association with somebody who goes into
5 one of those groups, right, or into, like, specific factions. It's just what it is. It's a small
6 world.

7 Q I completely understand.

8 I wanted to ask a couple questions about the finances of the Oath Keepers, but I'm
9 just going to pause here and see if any of my colleagues have any questions on the stuff
10 we've discussed.

11 And also I forgot to mention, James Sasso, who's also an investigative counsel,
12 joined us.

13 A Hello.

14 Q All right. Hearing none.

15 We discussed this in January, and at the time you mentioned that you weren't as
16 connected with the finances of the organization. But I'm just -- I'm going to ask the
17 questions again, and as I said before, if you don't know the answers, you can just say so.

18 Do you have a sense of how much the Oath Keepers brought in through dues each
19 year?

20 A I really don't, because I've never actually gotten a good firm footing on
21 actually how many members there are. I know it fluctuated. I know there was kind of,
22 like, a push in, like, December time frame, November, December.

23 But I don't really know, and I don't know who any of his, like, really specific donors
24 are.

25 I know -- I'm trying to remember who asked me that recently. But I -- I really -- I

1 just -- I don't know who -- who these people are.

2 Q Sure. Did anyone receive a salary from the Oath Keepers?

3 A There's a guy that did, like, their membership intake. His name was, like,
4 Brandon, I believe. I'm worse with names. But there's a guy. And I think maybe the
5 guy who did, like, their IT stuff, maybe.

6 Q Is that Ed Durfee?

7 A Maybe. Yes, I think Ed. I think it's Ed and a guy named Brandon, maybe.

8 Q Got it. And do you know Brandon's last name?

9 A I don't.

10 Q That's okay.

11 A No, I'm sorry.

12 Q Did the Oath Keepers organization have a bank account?

13 A I know they had -- so I know that Stewart got, after the 6th, that Bank of
14 America offered him. So I know he had to go get another one. Vista? I don't know. I
15 really don't know.

16 So remember when after the 6th Stewart was kind of, like, homeless -- well, he's
17 always, I think, kind of floated, but, like, he was more so. And he was staying primarily
18 between a couple of people. But I was just, like, basically letting him use -- because
19 John Shirley -- so after all of the stuff that happened in November, December, he and
20 John Shirley split, and so he's basically just, like, can I use your address or whatever.
21 And I was, like, I don't care, like, whatever.

22 So I know he ended up with a PO Box that I think was for his business stuff, but
23 then I think he was, like, sending his personal mail, which I didn't even know.

24 Actually, he was using my office, then gets a PO Box, and then I don't know how
25 stuff ends up in my personal address. No clue on that one. But I started getting some

1 of his stuff there.

2 So all of that to say is that I remember, like, a Vista Bank maybe and, like, a

3 Prosperity, but I don't know which is personal, I don't know which is business. I know

4 Bank of America ousted him for his accounts.

1

2 [11:11 a.m.]

3 BY [REDACTED]:

4 Q Got it. So, before January 6th, there was Bank of America; afterwards,
5 Prosperity and possibly Vista?

6 A I think so. That's what I can recall, to the best of my knowledge.

7 Q Fair enough.

8 Do you have a sense of whether there was an organizational bank account or if it
9 was, you know, a combination of -- whether Rhodes maintains Oath Keepers' funds in his
10 personal account?

11 A I don't know. And I really don't know the answer to those questions. I
12 mean, I've heard allegations and I've heard, you know, things thrown around, but I just -- I
13 don't know.

14 Q Yeah.

15 A I know that when he was traveling -- I think he spent, like, part of the
16 summer, last summer, in Wyoming. So I know he called the post office box, which was,
17 like, a UPS Store kind of thing, in Granbury, and he had me go there, grab his mail, and
18 then -- this was before Bank of America was closed. And so this is when it was closed,
19 actually.

20 Because he was like, can you get the checks, or whatever came in, and then just
21 use -- I think Chad had his debit card. Like, he had left a business backup debit card with
22 Chad. I'm trying to remember. Because Chad ends up -- I meet Chad, I get that, and
23 then I go to Bank of America and I'm going to try to make a deposit for him, and Bank of
24 America has shut off his debit card.

25 So, then, after that, I'm like, Stewart, I can't help you. Like, that's it.

1 Q Got it.

2 A But, as far as what I knew at that time, I went to the mailbox, got business
3 mail, I opened business mail with his permission, I took the checks, and I was to deposit
4 them in his business account. Does that make sense?

5 Q Yes.

6 A Okay. But I don't know beyond that.

7 Q The checks that you were going to deposit, were those dues or something
8 else?

9 A They looked like dues. It was just, like, I don't know, like, 15 or 20 checks
10 that were, whatever, 40, 50 bucks, whatever they were --

11 Q Got it.

12 A -- 25. I don't even know what that number was, but, yeah, that.

13 Q Did Stewart have any other sources of income, other than the Oath Keepers?

14 A Not that I'm aware of.

15 Q Got it.

16 And you mentioned a couple of people who handled some organizational things.
17 Was there an accountant or a financial person?

18 A I know they had conversations about getting one of those -- as a matter of
19 fact, I was on the phone with Chad and Stewart, and that was one of the conversations
20 they were having, was getting an accountant for the organization.

21 Q Got it. But, to your knowledge, they didn't do that?

22 A I don't know. Because, I mean, as -- basically, I'd end up on calls if they had
23 questions for me. Other than that, I don't -- I don't know.

24 Q Understood.

25 Did the Oath Keepers use any fundraising platforms?

1 A Okay. So I know when he got sued by the first civil suit and he tried -- so he
2 got that first civil suit, and then he had a criminal defense attorney because of the FBI,
3 and he was trying to just, you know, have somebody retained, because I told him,
4 look -- because I'm kind of in all of this too, not that I did anything, but just part of all of
5 this crap -- I told him he probably ought to get independent counsel. Basically, I would
6 help him with the org, but, I mean, I wasn't going to do any of his personal stuff.
7 Although, after he got picked up, he did ask me to try to help him with his divorce. I
8 didn't even do that.

9 The -- he got deplatformed; he couldn't do any crowdfunding-type stuff. He did
10 have legal bills, because I was on the conference calls with those attorneys, because we
11 were trying to decide if the org needed one, who needed one, did Stewart need one, did
12 the org need one, that kind of stuff.

13 So we did a few calls with a couple of attorneys. I know he paid some retainers
14 on them, but he was trying to fundraise for that. Because, at that point, he was still
15 trying to, like, basically save the org, like, you know, try to actually mount a defense and
16 stuff, as far as that was concerned. And they would not let him. He tried to organize,
17 like, a Stripe account -- or, because of Stripe, he couldn't use GiveSendGo or GoFundMe
18 or any of those. So I know that I did the client funds aspect trust, and then I would cut
19 the check back to Stewart.

20 And then I know he paid -- I know he paid a couple of attorneys, because I was
21 part of those email chains, but I don't know beyond that.

22 Q Got it. That was really helpful.

23 Is there anything else about the finances that you're aware of that we haven't
24 discussed?

25 A No.

1 Q And then, to your knowledge, did they have any cryptocurrency accounts?

2 A I know they were trying to set those up before he got arrested, because I
3 was on a call -- they called me for something, and they were talking about -- it was Chad
4 and that guy P.K. and Stewart, and they were talking about doing a crypto wallet or -- I
5 don't know. I don't know how any of that works, I'm not going to lie. Whatever.
6 They were talking about setting one up.

7 Q Got it.

8 [REDACTED] So what I'd like to do is -- we've been going for a little bit more
9 than an hour. I was thinking we could take a 5-minute break.

10 And before we do that, I want to see if any of my colleagues have any questions
11 on what we were just discussing.

12 BY [REDACTED]:

13 Q Real briefly, just wanted to touch on the timing of the crypto. You
14 mentioned it was right before Mr. Rhodes was arrested. So this was after January 6th
15 that Mr. Rhodes was talking about setting up crypto accounts?

16 A Yeah, so that was -- and I say right before Stewart got arrested, but I think it
17 was October, November, somewhere in there.

18 Q Do you recall a reason why Mr. Rhodes was trying to set up a crypto account
19 at this time?

20 A Because they basically had no way to -- they weren't able to crowdfund. I
21 mean, they just -- they were just trying to find alternative ways to finance stuff. They
22 weren't able to do much of anything. And so, I mean, I know the guys were just trying
23 to, like, come up with ways to do stuff still and not completely lose the org.

24 And he had gotten sued. I don't know how many times he's been sued now,
25 three or four. I got served with one, there was the original one, and I think there's one

1 more after that, I'm not sure. Or maybe they're just amending. I don't know. I
2 just -- I kind of stepped back.

3 But I know that that's what they were trying to figure out, is how to, like, keep the
4 org afloat. And that's why, after he got arrested and when I was there for, like, the
5 3 weeks and while they were doing -- you know, while they were trying to coordinate that
6 stuff, I was just telling the guys, like, honestly, I don't have a lot of hope for the long term.
7 I mean, the org's not exactly a cash cow, and, you know, I mean, really, what are you
8 fighting for at this point, you know?

9 Q Got it. Thank you, Ms. SoRelle. That's all I had.

10 [REDACTED] Great.

11 Anyone else on those topics?

12 All right. Why don't we take a break until 11:25 eastern, and we'll go into recess
13 until then. Thanks.

14 Oh, and, Ms. SoRelle, feel free to turn your video off and mute.

15 [Recess.]

16 [REDACTED] We'll go back on the record at 11:26 a.m. eastern time.

17 BY [REDACTED]:

18 Q So, Ms. SoRelle, earlier this morning and last time we spoke, you discussed
19 how you went to Michigan during the actual election in 2020. Is that correct?

20 A I did.

21 Q And you were in Detroit specifically?

22 A Correct.

23 Q And can you just again explain to us why you traveled to Detroit and what
24 you were doing in Detroit for the election in 2020?

25 A So I was -- so we have, like, a Texas conservative/Libertarian Facebook

1 group. And it's not, like, sanctioned by the bar; it's just a bunch of attorneys that got
2 together around the State. And it kind of actually got -- it took off, basically, during all
3 the lockdown stuff. And we basically just communicated information.

4 And so there was, like, a Lawyers for Trump volunteer thing that was set up. And
5 so some of them, which I end up with in Michigan, were kind of floating the pamphlet
6 around, and we were all just kind of going back and forth on whether or not to go or not
7 go or, you know, what everybody should do. And so I ended up volunteering for that.

8 Q Okay. And then how did Michigan come on the radar of this Lawyers for
9 Trump out of Texas Facebook group?

10 A So my understanding is that there were -- all right. So, I mean, I can tell
11 you what I learned later, is that these were basically the battleground States that were
12 kind of predetermined by both parties. And so these were kind of, like, the ones that
13 they had created this crap off of.

14 Q Okay. And what specifically did you do when you went to Detroit for the
15 election?

16 A So, when I got there, there was, like, nothing done for Wayne County. And
17 so, instead of doing, like, any type of legitimate legal work, we were doing -- calling and
18 getting volunteers to be at the polling locations and the Cobo Hall, the absentee-ballot
19 counting center, the main location.

20 Q And approximately when did you get to Detroit? It sounds like a little
21 before the election?

22 A I got there the 1st.

23 Q The 1st of November?

24 A I believe, yes.

25 Q Okay. And you said that nothing had been done so we started. Who's

1 "we"? Were you working with other people?

2 A So the RNC's office, there were two offices in Detroit. There was
3 Liv- -- Livern- -- the "L" street one that I was at, and then there was another one.

4 Q Okay.

5 A And so we were just broken up -- there was, like, I think, probably 15 or 20
6 attorneys. We were broken up between the two offices. And we were assigned to an
7 office, went to it, and just basically pitched in wherever they needed us.

8 And when we got there, there was just, like, mad chaos. Nothing had been
9 done. And so we were trying to get Wayne County situated.

10 Q Okay. And so you were at one of the RNC offices for this work.

11 A It was RNC, but it was -- I mean, because they were on -- they were doing
12 calls with the RNC. And I think --

13 Q Okay.

14 A -- it was actually, like, a campaign -- because, if you recall, back in, like, I
15 think -- because I had to go back and look, because I couldn't figure out -- when they were
16 doing the donation stuff, everything was coming up under the RNC, because it looks like
17 they merged the RNC and the campaign somewhere in there.

18 Q Right.

19 A And so the RNC ended up, like, basically kind of in control of the offices for
20 Trump. So it was, like, a lot of RNC staffers, because we heard that word a lot, and we
21 were talking on the phone to State GOP, but it was the campaign field office, basically.
22 But it was RNC-associated. Because the RNC's who paid for our trip. Everything came
23 under the RNC umbrella.

24 Q Now, it sounds like this opportunity came through the Facebook group you
25 were describing. Did you discuss going to Detroit with Mr. Rhodes beforehand?

1 A No, not anything more than just, like, "Hey, I think I may be going to
2 Detroit." Or, actually, it was going to be that or Minnesota, and I think Minnesota ends
3 up being, like, a washout, because they were originally telling me they were going to send
4 me to Minnesota, or Minneapolis, and I -- that didn't happen.

5 So when, basically, they send me an email, they're like, "We're sending you to
6 Detroit." Like, when I talked to them over the phone, they were like, "Look, we're
7 probably sending you to Minnesota." And the rest of the attorneys that were already
8 going from Texas were going to Detroit. And I was like, okay, fine. I was like, hopefully
9 maybe somebody else will end up over on the Minnesota team and I'm not there
10 completely without, you know, people I know. But whatever. And then I end up in
11 Detroit. So it was just that.

12 And the only time I talked to Stewart about it was basically just saying, "Hey, I
13 think I may be going to Detroit, in case there's any issues." Like, it was more of just a,
14 like, do you have a chapter in Michigan or in that area, more than anything else.

15 Q When you said --

16 A It wasn't to go overthrow the State of Michigan either or anything crazy.

17 Q That's --

18 A -- kind of like the security guys, you know?

19 Q That's not where I was going, Ms. SoRelle.

20 But did you receive an email -- you said you received an email. We didn't see
21 that in the production. I know you produced chats to us, but -- I might have missed it.
22 Did you produce the email that you received to go to Detroit? Or, if not, can you
23 produce it when we're done with the deposition, just so we can see that?

24 A Yeah. Let me see if I can --

25 Q And you don't have to look now. And I can send you a followup email that,

1 kind of, lists stuff that we'd be interested in obtaining from you that might come up
2 during the deposition today.

3 So it sounds like -- did Mr. Rhodes actually end up coordinating security for you
4 while you were in Michigan?

5 A Yes, he did.

6 Q Okay. Is this with Whip and Mr. Morelock?

7 A Correct.

8 Q Can you just walk us through at a high level how this process works, like,
9 how you go through Mr. Rhodes and then how he actually assigns you security, personal
10 security?

11 A I'm not really 100 percent certain.

12 Q Okay.

13 A I just told him -- it was basically the day after, like, I started getting some
14 nasty stuff, I call it -- actually, I talked to him while I was up there, because he checked in
15 me while I was up there, and it was actually when I was heading up there to Cobo Hall.
16 And I told him I was going up there. He was like, just be careful. I was like, yeah, it's
17 fine, I'll be careful.

18 And, basically, we had -- I mean, that was it. After, like, I started getting, like, my
19 phone blown up. I can't remember if he called or if I called him. I don't recall. But,
20 basically, it was just a conversation over whether or not, like, he was going to send
21 security or not.

22 And then he said, let me see who I can get or whatever. And then the next thing
23 I know, he's like, okay, I'm going to send Whip and -- "Whip It" is what I called him at the
24 time -- Jeff Morelock and Michael Green or Simmons or whatever his name is, I don't
25 know.

1 Q Yeah.

2 A I mean, that's why I was, like -- even the names I can remember, I don't even
3 know what they are, so -- you know.

4 Q It's all right.

5 So you said -- earlier, you described briefly some of the incidents that happened to
6 you in Detroit. Approximately when did this happen? So you arrived November 1st.
7 Approximately when did the incidents start happening?

8 A No, I had, like, a -- it was great when I got there. I actually really liked
9 Detroit. I cruised around, went to polling locations, went and checked out some
10 dropboxes. I was up in Dearborn. I mean, that was -- that was pretty much it. I just
11 kind of did my thing.

12 And then, that night, when the election results were, like, coming in and the
13 media was basically saying that they were going to shut down, that, you know, the
14 battleground States were shutting down for the evening, we had been in there, in
15 the -- like, we had all kind of gathered into one of the hotel rooms, and I just decided I
16 was going to run down to Cobo Hall, because we were, like, a mile from there.

17 So I was so, like, pretty much in my PJs. Well, I was in, like, comfy clothes. And
18 grabbed my gun and my purse and my phone and went down there.

19 And, yes, I have a license, and they do have reciprocity.

20 Q No worries at all. No worries at all.

21 A But I grabbed my stuff, and I went down there, and I just camped out.
22 Because it was fully still functioning. So I was like, this is totally not what was just
23 announced on TV.

24 So I was literally going to go drive by just to make sure they were shutting things
25 down, and when I got there, there was a lot of activity, people coming and going. The

1 media trucks were all still there. You know, like, everything was still going.

2 So then I was like, well, this is weird. So then I went in, I started looking, and I
3 was like, okay, this is a problem. So I just kind of sat out there and camped out, started
4 recording.

5 Q So I guess what I'm trying to understand, though, is, what incident triggered
6 to you ask for a personal security detail?

7 A So, then, after I did that, after I recorded some videos and stuff like that, I
8 get back to the hotel. I was trying to text everybody, but they were asleep. Smart
9 people. And the next morning I finally get a hold of someone, and I'm like, somebody
10 needs to get their butt down here. And so half the group goes down there. I come
11 back to the hotel.

12 And then one of the girls is friends with Bill Richardson, I think is the attorney's
13 name, out of Texas. And he's also the attorney for Steven Crowder. And I end up
14 doing a "Louder With Crowder" video. It kind of takes off pretty quick. And then, after
15 that, I start getting threats.

16 Q So this is the day after the election?

17 A This -- well, yeah. It was the 4th, the morning of the 4th.

18 Q Okay. The morning of the 4th.

19 And, then, approximately when did Whip and Whip It arrive to provide security for
20 you?

21 A The 6th maybe?

22 Q Okay. And how long did you end up staying in Detroit?

23 A A few more days after that, because I was dealing with -- so our original
24 departure date got pushed back. Everybody stayed a couple of days. And then,
25 basically, they left; I was there, I think, an overnight. I'm trying to remember.

1 Q No. Approximate is fine. So it sounds like a few more days after --

2 A So it was, like, an overnight when I was there by myself, and then they
3 started getting there the next morning.

4 Q Okay.

5 A So --

6 Q And you stayed in Detroit until, what, about the 9th or the 10th? Is that
7 fair?

8 A That's probably about fair, yeah.

9 Q Okay.

10 And you said our date got pushed out from when you were originally scheduled to
11 depart. Why did that day get pushed out?

12 A So they got -- they got pushed out because there were issues in Detroit,
13 contrary to everybody's opinion. We were trying to start getting everybody -- so they
14 were going to do the recount. They were going to do -- it just turned into a crap-show,
15 and it was a mess.

16 And I was trying to -- and we were talking to people nonstop. Like, the phones
17 were blowing up. I ended up dealing with, like, Antrim County; I ended up dealing with
18 the people there. And so we're trying to create a system to handle the volume of calls.

19 The RNC's not really cooperative at all. As a matter of fact, during my initial
20 conversations with Shawn Flynn, I believe, and -- I can't remember the other guy that was
21 kind of running Detroit -- they were just like, "Let it go." And then I did the video, and so
22 it kind of, like -- so that's why I did the video, is because I was mad at the RNC.

23 And so then the RNC ends up paying for everybody to stay a couple days, because
24 they need to do the recount or whatever. And I just end up -- we create a system where
25 we start handling the flow. They turn over the 1-800 or the 800 number of whatever for

1 us, and so we just kind of take over. And there's, like, you know, I don't know, maybe 10
2 of us that stay on, working on that.

3 And then I end up kind of -- I end up talking to Andrew Giuliani somewhere in
4 there, and I talked to a guy named Robert Carone.

5 But that's why. We were just trying to get everything coordinated and done.

6 And then I stayed behind just to make sure that if anybody needed, like, you
7 know, like, to turn -- like, to actually talk to someone, like, I was just kind of staying on the
8 ground. I was like, that's fine, I'll do it.

9 Q You were continuing to monitor the situation as the vote count continued.
10 Fair enough to say?

11 A Yeah. Well -- but I was actually dealing more with the people.

12 Q Okay. "The people" as in --

13 A That were providing affidavits.

14 Q Got it. Okay. So you were assisting with the affidavit collection for the
15 Detroit polling locations?

16 A So I would do kind of, like, the -- yes. And I would do, like, the preliminary
17 conversation with them. And then we were kind of funneling them off to -- we would
18 send them an affidavit, and then we would review the affidavit, and then if they needed
19 additional information -- I was kind of basically staying there on the ground in case there
20 was something else we needed or if there was something else to correspond with it, if
21 that makes sense.

22 Q And just to be clear, who were you forwarding these afterwards to?

23 A I was -- so that was one of the issues that ends up arising. Initially, I was
24 sending them all to, like, [REDACTED], I think. And then I end up communicating
25 with -- shoot -- Katherine Friess. So then I'm sending them to Katherine Friess, Red

1 Team.

2 And then I end up communicating with -- so you have the break-off between
3 Rudy's camp and Sidney's camp. And so then I end up forwarding stuff to Katherine
4 Friess, Red Team, and then verifying that we're getting stuff to the camp with Sidney.
5 And then also Phill Kline comes into play.

6 So, like, basically, we're just becoming the center point for all of the camps, and
7 we're just trying to push them out.

8 Q Got it.

9 Did you pay for this trip to Michigan by yourself, or did someone pay for you?

10 A So they paid for the initial chunk of time that I was there. They paid for the
11 rental car and the hotel. And --

12 Q Who's "they," by the way? Who is "they"?

13 A RNC.

14 Q Okay. RNC. Got it.

15 A Right. But I end up covering a lot of my expenses later on, and I end up
16 covering, like, basically all of my food and stuff like that.

17 Q When they paid you, did you submit, like, some of these initial fees for
18 reimbursement? Or did they pay for you up front, like, saying, "We booked a hotel
19 room in your name"? How did that work?

20 A That's what they did, is they booked everything in advance, and then they
21 just sent us the reservations and the car rentals and all of that stuff.

22 And there was supposed to be a mechanism for submitting reimbursements, but
23 people were having a lot of issues with it, and I just finally was like, I'm not even going to
24 fight with them. I was mad at them anyway.

25 Q And who paid for your security, for Whip and Whip It?

1 A I paid for a portion of it, and Stewart paid for a portion of it.

2 Q Do you recall how much you paid for the security for those, it seems like, 3
3 to 4 days?

4 A Oh, well, but, see, they end up staying with me for a little bit longer --

5 Q Okay.

6 A -- because then we go to, like, Atlanta and D.C.

7 Q Okay.

8 A And, I mean, you've got to realize that, like, at one point that spring, I had
9 literally, from my office that I was not at during the day -- because I was trying to stay out
10 of the office, because they were getting bombarded. And so you have to understand
11 that, at one point, a bomb threat was called into our courthouse and my kids' high school
12 that was spoofed from my office line. So this wasn't, like, just me being overdramatic.
13 There were, like, literally people not happy with me.

14 Q Yeah. I'm sorry to hear about the threats to you and your family.
15 Definitely sorry to hear about that.

16 So, when you left Michigan, did you go back to Texas, or did you go straight to
17 D.C.? I guess, between -- and this is the time period I'm trying to understand -- between
18 November 10th, did you go straight to D.C. for the November 14th rally?

19 A No. That's where we went to North Carolina to Doug Smith's house.

20 Q Okay, to Doug Smith's house.

21 A And so I went to Doug Smith's. I can't remember the dates. I mean, I'm
22 sure somewhere in there in the world they've got that trapped already, but --

23 Q Okay.

24 A I go to Doug Smith's house. I'm there for a few days. Then we head up to
25 D.C.

1 Q Okay.

2 A And we stay at Tyson's Corner, the same hotel that we end up, like,
3 becoming the home base for everything.

4 Q The Hilton Garden Inn in Vienna?

5 A Yeah, that one.

6 Q Okay.

7 So, around this time, in Mr. Rhodes's indictment, so right after the election,
8 around November 10th timeframe, is when Mr. Rhodes creates the "Leadership intel
9 sharing secured" Signal group. Do you recall this group? It was, like, Leadership intel
10 group --

11 A Yeah, so those -- those don't have anything -- that's the one I was telling you
12 where they were giving me names to -- like, Hari Hersey (ph) and that stuff.

13 Q Okay.

14 A So that was all purely associated with -- I thought you wanted rally stuff. I
15 didn't realize, like, it was actually, like, the crossover into the Lawyers for Trump stuff.

16 Q Oh. So the Leadership intel sharing, I mean, it was mentioned in the DOJ
17 indictment, so we were looking for those chats as well. And it's okay; you can produce it
18 to us. Do you still have those chats?

19 A I don't -- my chats were so cut-and-paste, but I will go see what I can find.

20 Q Okay. Thank you so much.

21 A But, then, there's also -- so there's two of those. There's one -- and I'm not
22 associated with one of them, but one was literally election-related stuff. So they were
23 keeping me up to date with different States and what was coming in out of them.

24 Q Okay. Well, that -- we'll send you --

25 A So I don't know which one they're referencing, is what I'm trying to say.

1 Q Okay. Well, I will send you the name of what's in the indictment, and if you
2 could search just your Signal chats for these groups and --

3 A Okay.

4 Q -- produce what you have, that would be much appreciated.

5 And, then, also around this time is when we see from your production -- which,
6 thank you again for producing it to us. And I'm going to pull up an exhibit for you. It's
7 around this time that we see your first message in the Friends of Stone chat.

8 A Uh-huh.

9 Q One second. Sorry.

10 A I know which one it is.

11 Q So I shouldn't be doing this. All right.

12 So, Friends of Stone, we see the first message around November 10th. Can you
13 see that?

14 A Yep.

15 Q Okay. So, in general, what is the Friends of Stone chat? What is this
16 group?

17 A So I was added to that chat. I didn't know any of these people. While I
18 was in Detroit, I started getting calls. Like, I told you I end up talking to Andrew Giuliani,
19 I end up talking to Katherine Friess, Robert Carone. Marsha Lessard I think I end up
20 talking to. And then -- but it all comes from -- and I'm going to screw this up -- I think it's
21 Jason Sullivan?

22 Q Okay.

23 A He was the one that I think is associated with Roger Stone and had
24 testified -- because he tells me in there that he had testified against Stone -- or he hadn't
25 testified against Stone, but Stone was mad at him over it. But he tells me that he's

1 basically trying to make amends with Roger Stone during that time.

2 And then there's a girl out of Texas, and I can't remember her name, but she's also
3 part of the medical freedom movement. But I had met her during the rally series.

4 So all of these people start kind of, like, popping up together. And I end up
5 talking -- and there's, like, some crossovers there. Like I said, like, everybody kind of
6 cross-contaminates. I'm not part of their world, but I'm learning their world.

7 And I end up, basically, on the phone with Jason Sullivan. Then I get added to
8 this Friends of Stone stuff at that point. And I really have no relationship with any of
9 them, other than they're just trying to, like -- they're basically -- because I'm on the
10 ground, they're trying to kind of incorporate me in the loop, so to speak.

11 Q So can you -- could we just take a little step back? Who is Jason Sullivan?
12 What's his name in this chat? Help us understand his role in this big picture, if you can.

13 A So -- I don't see the people in there. So Jason Sullivan, at that point -- I
14 don't know if he's in there.

15 Q Okay.

16 A Because I think he's the one that adds me in there, but I didn't see him
17 talking. So that was the weird thing too.

18 Q Okay. So it's your belief that Mr. Sullivan --

19 A I don't know who grabs me in there, honestly.

20 Q Okay.

21 A But I know I'm talking to him, and then the next thing I know, I'm getting an
22 invite to this group. And I don't know if he's talking to Stone and then they're like, hey,
23 go grab her. I don't know.

24 But all I know is that I'm basically sent into -- and, as a matter of fact, this is when I
25 download Telegram is during this time -- or -- yeah, Tele- -- no, this is Signal. I already

1 had Signal. I get Telegram later. But it's not rally-related, just for the record, or even
2 any of this stuff.

3 But this is when I get added into this stuff. And I have, like, no real-world
4 relationship with any of these people. I'm just kind of getting sucked into their world.
5 And so I'm just kind of like, okay, what this is?

6 And I think --

7 Q Okay.

8 A -- they were calling to say they were going to start this Stop the Steal series
9 stuff, is basically what it was about, was they were trying to collect data.

10 They also send me to find people, by the way, while I'm in Detroit. They want
11 me to reach out and get a hold of some people. So that's how I end up meeting up
12 with -- oh, shoot, what is his name? Dangit. He was a former State senator, I think?

13 Q Doug Mastriano?

14 A No, no, no. He's out of Pennsylvania.

15 Q Yeah.

16 A And then there's the aides that are involved. Shoot. They're the guys
17 that, like, basically run the whole show up there.

18 Q In Michigan?

19 A In Michigan.

20 Q Okay. Well, if you think about it, let us know.

21 But were you talking to Mr. Sullivan in person or via text when he added you?

22 A So I was talking to him on the phone, and then the next thing I know, I get an
23 invite. And what he's running is social media stuff. I know that.

24 Q Was he running it for Mr. Stone -- Mr. Roger Stone?

25 A So that's where I was telling you, like, in some weird way, he's trying to get

1 back in good graces, because he tells me that Roger Stone is mad at him. And so he's
2 trying to get back in good graces with Roger Stone.

3 And so I guess he's trying to use me to kind of, like, create a reason to be back in
4 communication, would be kind of a way to -- and then he calls me and asks me to get a
5 hold of -- what the heck is his name? Thirty seconds.

6 Q No worries.

7 A Continue.

8 Q No, you can look it up, and then we'll continue.

9 A It's Shane Trejo -- because I end up getting the video from Detroit Leaks or
10 whatever through them. And I'm trying to find -- Patrick Colbeck.

11 Q Can you spell that last name for us, please?

12 A C-o-l-b-e-c-k.

13 Q Thank you.

14 A But --

15 Q Okay.

16 A -- ironically -- oh.

17 Q Oh, no, no. Keep going.

18 A Ironically, I find out later that one of the videos I record of the guy who
19 comes out at 3:30-something in the morning and he's talking about the ballots that just
20 got dropped, the first batch. He's talking about the second batch coming in, and I hear
21 him -- I can't decide exactly, and you can't hear it on the audio, and so I don't want to say.
22 It sounds to me as if he is negotiating dollar amounts.

23 Q Okay.

24 A And I can't quite figure that out.

25 I find out later that that individual is Shane Trejo. I didn't know who he was at

1 the time. I don't put that together until later.

2 Q Got it. Got it. Okay.

3 So Mr. Sullivan, it sounds like from talking to you, from your impression, is trying
4 to get back in the good graces of Mr. Stone. I guess, what is Mr. Stone's, to your
5 understanding, plan at this point on November 10th as we start the Stop the Steal series?

6 A That's it, is that it's a -- that they're going to start doing rallies, and they want
7 me to attend them. I mean, like, that's basically the whole point of me getting added to
8 the group and all of that stuff, is that they want -- I mean, like, they basically know -- like,
9 because I end up kind of -- he's asking me, like, just what are you doing, how long are you
10 staying, you know, what do you know, information, whatever, and trying to put me in
11 contact with certain people. And I tell him that -- which, ironically, in hindsight now, I
12 see Stewart's already in that group, right?

13 So it's just kind of putting this full thing together, even though Stewart
14 wasn't -- like, Stewart's not who added me in there. So it was weird, because I'm
15 thinking, like, holy crap, this thing is, like, circular, right? There's this whole little, like,
16 bubble, and I didn't even know it.

17 Q So what was Mr. Rhodes's relationship with Mr. Stone?

18 A So Stewart's relationship between all of them really stems from Alex Jones,
19 because he had done appearances on Alex's show, right? So my understanding of his
20 relationship with that entire group all stems from that flow through to Alex Jones.

21 Q So do you believe -- I guess, from your impression, it sounds like -- and we'll
22 just use Mr. Stone as an example -- Alex Jones had the relationship with Mr. Stone, and
23 Mr. Jones brought Stewart Rhodes into that kind of circle, is the way you're describing it?

24 A Yes. And that is absolutely how it works. Because, like, later when -- like,
25 after the November rally, when we're all sitting in the -- because Alex Jones was staying at

1 the Willard, and we'd go up there to the Willard -- sorry.

2 My cat's exploring, and I'm, like, waiting for it to knock something over.

3 Basically, I get the impression by sitting in there that Alex becomes, like, the
4 mouthpiece for Stone. And so we're just kind of like -- he's like, yeah, we're going do a
5 series, and they've got this -- you know, Ali, me, and Stone. So it's kind of that kind of
6 thing, right?

7 Q Right. So that's actually something that I was going to go to next.

8 You mentioned that Mr. Stone wanted to start this Stop the Steal series of rallies.
9 Who did you consider the leader of these rallies? It sounds like from what you just said
10 it was Mr. Stone, Mr. Jones, and Mr. Ali Alexander. Is that correct?

11 A Those are the ones that became, like, the center point for everything. So it
12 really seemed -- well, then, later, in Georgia, I end up meeting up with 1AP. And that
13 was Yoda and Rob Lewis and those guys. So then they --

14 Q What did 1AP have to do with organizing Stop the Steal rallies?

15 A They're the ones orchestrating majority of it.

16 Q "Orchestrating"? What do you mean by "orchestrating"?

17 A So they're involved in all of that. So the meetings that the Oath Keepers
18 end up having, they're the ones coordinating -- they're in the group chats with those
19 particular groups.

20 Q Okay. Coordinating security for all the rallies that --

21 A That's what they're --

22 Q -- are organized by Mr. Stone, Mr. Jones, and Mr. Alexander?

23 A So that's what it ends up becoming, is that Tim Enlow from 1AP, who is
24 actually Alex Jones's security, is kind of, like, the crux on that side. And then you have
25 basically -- so it's, like, Tim Enlow and then Yoda and Rob Lewis, Ali Alexander, and Roger

1 Stone.

2 And then you kind of, off of Tim Enlow -- which, I meet Tim Enlow, like, in
3 November, right? So, like, basically, he's become kind of, like, the bubble that's kind of,
4 like, shooting everybody off into, like, what everybody's doing, if that makes sense.

5 Q Okay. So 1AP played a -- and from what you remember, 1AP played
6 somewhat of a planning role, along with Mr. Alexander, Mr. Jones, and Mr. Stone, about
7 where to send people for Stop the Steal rallies after the election?

8 A Correct. And that became really apparent when we were in Atlanta at the
9 hotel after the Atlanta rally.

10 Q Okay. And we'll get to that November 18th rally in Atlanta shortly.
11 I'm going to switch it over to Mr. Prasanna, who I believe has a followup question.

12 BY [REDACTED]:

13 Q You mentioned Yoda. Do you know who that is?

14 A I don't -- I only know him as Yoda.

15 Q Got it.

16 A I'm sorry.

17 Q And did you ever hear of or meet somebody named Phillip Luelsdorff?

18 A Not that I can recall.

19 Q Got it.

20 And did you have any direct interactions with 1AP?

21 A Yes, I did.

22 Q What were those interactions?

23 A That was after the Atlanta rally. We all went to their hotel. It was Ali
24 Alexander and 1AP all stayed in a hotel in downtown Atlanta, and I met all of them. And
25 that was where 1AP actually came on my radar. I didn't know who any of them were

1 until that night. And then they were explaining that they were helping Ali and all of
2 them with the Stop the Steal series.

3 Q Got it.

4 A And then, later, I see that Rob Lewis and Yoda and all of them are
5 coordinating with everybody else. And that's Bianca Gracia, Marsha Lessard. Like,
6 basically they kind of become, like, this -- Ali and them are the ones coordinating
7 everything.

8 Q Got it.

9 And, sorry, did you say that Stewart was also staying at the same hotel as Ali
10 Alexander and 1AP?

11 A No. No, we -- Oath Keepers stayed at another Hilton Garden Inn, I think.
12 I think Stewart like Hilton Garden Inn. But we were probably, like, 15 minutes from
13 where they were.

14 Q Got it.

15 Did you get the sense that Stewart -- what was your sense of Stewart's
16 relationship with 1AP or with Rob Lewis?

17 A So this is where, when we get to the hotel, Stewart tells me that they want
18 to talk to him about, like, basically the rest of the series that they're going to do.

19 And I don't know -- and I'll be honest with you, I don't know, and I don't have
20 access to his stuff, but I don't -- I never get the impression that what happened on the 6th
21 was ever something Stewart was aware of, just for the record. But, in hindsight, now
22 I'm like, it's weird, because they wanted to talk to him about that.

23 And so he was like, hey, we need to go over to this hotel, and I'm going to, you
24 know, chat with these guys. And he's telling me it's Rob Lewis and Yoda and Ali
25 Alexander and that they're coordinating just basically where all the rallies are going to be

1 and trying to figure out schedule and all of that stuff. Right?

2 And so we go over there. We all end up kind of, like, hanging out, like, in this,
3 like, lobby area. It's on, like, the, I don't know, 13th floor, but it's just, like, a giant open
4 area. And, anyway, they had brought beer and stuff, and we're all just kind of hanging
5 out and chatting and stuff like that. Like, I had talked to Ali, and he tells me, like, how
6 he used to -- he had worked on Abbott's campaign, and just, like, the history of him back
7 to, like, 2008.

8 So, you know, he's just kind of introducing him. We're from the same area, so
9 he's just kind of giving me that information. And it doesn't sound nefarious. It doesn't
10 sound like, you know, we're going to do anything crazy. It's just, you know, this is what
11 we're doing.

12 And we'd already gone to the Governor's mansion, by the way.

13 Q Got it.

14 A And I didn't like Nick Fuentes. So there you go.

15 Q Can you elaborate on that?

16 A So Stewart and Nick Fuentes, earlier that evening, get into an argument on
17 the streets of -- it's one of these little restaurant areas. It's real cute. And they get into
18 kind of a disagreement over White supremacists and why Stewart wasn't providing
19 security for Nick. And I was with Whip at the time.

20 And Stewart just kind of keeps walking, but Nick's still, like, talking crap. And I
21 turn around and I basically flip him off. And he tells me he's the future of the
22 Republican Party, and I was like, no, over my dead body, kind of thing. And the
23 Groypers were all going nuts. And I end up flipping him off. And there's a meme, it's
24 pretty funny, of me flipping him off and Whip trying to drag me off. But, yeah.

25 So there's definitely a distinction between the factions, is all I'm saying. And I

1 learned about that during that timeframe, is because there's this more extremist side of
2 the group, and then there are kind of the ones that are just there for a specific purpose.

3 Like, I would say that, at that point, it was kind of becoming obvious to me that
4 there was, like, some other weird faction I wanted nothing to do with whatsoever. And
5 then I was fine with doing, like, the rally series and stuff like that. I just didn't want to
6 cross-contaminate.

7 And that was the whole point, is I was -- Stewart and all of us were discussing how
8 we were making sure that there was a divided line between -- because I fall more on, like,
9 the conservative/Libertarian bubble, not, like, fascist/crazy bubble. So it was just, that
10 distinction was being drawn in Atlanta.

11 Q Got it.

12 And did you see, you know, this group of Roger Stone, Ali Alexander, Tim Enlow?
13 Were they part of different factions or the same faction?

14 A So they were kind of the midpoint on the -- they would be what would be
15 the go-between on those factions. And they would be the ones that were, like -- so
16 there was just this one side that didn't meet, like, I would say, our side, but Ali Alexander
17 Alaska, Roger Stone, Alex Jones were kind of that dividing line. So, like, I was seeing
18 communications this way to them, right, but it didn't go over to the other side.

19 Q Got it. And so what were the different factions that they were the, kind of,
20 midpoints of?

21 A So that's what I was saying. Like, the Nick Fuentes side was probably on
22 the far extreme right, and --

23 Q You saw them kind of -- you saw them also communicating with people like
24 Nick Fuentes?

25 A Yes. No, they were all part of the same bubble, if that makes sense. So

1 you had, like -- they were the midpoint -- they were the ones trying to orchestrate -- okay.

2 So they were the ones trying to get Stewart to provide security for Nick Fuentes.
3 That's what started all of this. Tim Enlow and them wanted Nick Fuentes to get a
4 security detail from Stewart. Stewart refused, and so Nick Fuentes went off on Stewart.
5 Stewart walks off.

6 And I go off on him about, that's never going to happen; like, those two lines will
7 never cross. Like, that is -- I just got mad at Nick. Sorry.

8 Q Did you or Stewart think that Nick was a White supremacist?

9 A Yes. Absolutely.

10 Q Got it.

11 A That's what he was referring to when he said the Republican Party's future.

12 Q Were there other major factions, other than -- you described it as extremists
13 on one side, conservative/Libertarians on the other side. Were there other major
14 factions?

15 A Nope. That was kind of, like, the two sides of the -- I would just say, the
16 difference between the fascists and the Libertarians, right? Like, two polar-opposite
17 extremes almost. And both were being kind of sucked into the Roger Stone-Ali
18 Alexander world. And that's what I didn't -- that was, like, the separation point. Like,
19 that was -- I mean, that was -- there was not crossing over between the two sides.

20 And so Stewart, me, Whip, Oath Keepers, all that were on one side. It was very
21 clear the other side was doing their own thing. And those two did not cross over, except
22 for that line of communication done by the one group, which was that Ali
23 Alexander-Roger Stone line.

24 Q Got it.

25 A Does that make sense? I don't know if I'm making sense.

1 Q Yeah. That's really helpful.

2 [REDACTED]?

3 BY [REDACTED]:

4 Q Yeah. I guess, going into this discussion of factions, can you help us
5 understand, then, the Proud Boys and how they fit into the mix of these groups or these
6 people?

7 A So Proud -- oh. Well, Proud Boys were in Atlanta too. I did not -- they've
8 been at everything. But I did not see Proud Boys -- like, Enrique -- like, in Atlanta, we
9 didn't see -- and I'm trying to remember if Proud -- yes, they were all there, but they
10 weren't at the hotel that evening.

11 Q So I guess the question -- we've seen Mr. Tarrío in the "Friends of Stone"
12 chat. So who would bring in the Proud Boys, if you know, to attend these Stop the Steal
13 rallies?

14 A It was Ali Alexander and Roger Stone. That's what it -- but that's what I'm
15 saying; they were on the other side of a line.

16 This is what's so funny about that stupid video in the garage that absolutely cracks
17 me up. The only crossover with that was Latinos for Trump, right?

18 Q Right.

19 A We didn't have a relationship. And if anybody actually pulls that full audio,
20 you'll see there's no relationship between Stewart and Enrique, ever. That was the first
21 time they actually shook hands. And that's because Stewart kept that line over from
22 that faction, and Enrique fell on the other side.

23 Q Can you help us understand the difference and why there was a line
24 between the Proud Boys and the Oath Keepers?

25 A Just the extremist aspect of it.

1 Q What's the extremist aspect of it? I guess, elaborate on that for us.

2 A So that's what I'm saying. Like, Stewart was pro-military, pro-law
3 enforcement, pro-EMS, you know, first responders, that kind of thing, right? It
4 wasn't -- the other side was pretty extreme just in their views, right? Because the whole
5 fight was over White-supremacy-type stuff, which is ironic, but it's what the fight was, if
6 that makes sense.

7 So there was definitely a faction that was further over on the right side than
8 Stewart was, and that's what Proud Boys was connected to. So that's why Stewart and
9 Proud Boys did not cross over.

10 As a matter of fact, Stewart would say, "I'm not into all that" -- I'm just going to
11 quote him -- "Nazi, White supremacist bullshit."

12 Q But, I guess, are the Proud Boys considered a White supremacy group?

13 A That's the funny part, right? But that's the class that they hang out with.

14 Q Okay.

15 Does that trigger any followup from anyone?

16 Okay. So, also, going back to --

17 [REDACTED] I believe [REDACTED] has a followup.

18 [REDACTED] Sorry.

19 [REDACTED] Thank you, [REDACTED]

20 BY [REDACTED]:

21 Q Hi, Ms. SoRelle.

22 A Hello.

23 Q I was curious about following up to ask more about the role that Mr. Stone
24 and Mr. Alexander played in actually the mediating conflicts between these various
25 factions. Were there ever instances where they had to do that? Or how did that

1 work?

2 A No. There was basically just this dividing line where the two shall not
3 meet. So, like, you just didn't cross over that line.

4 And I'm not suggesting that I think Enrique is a White supremacist, like, on his
5 own, right? What I'm saying is, he was associating with those that were more on the
6 radical right. Right?

7 And so that was kind of the dividing line, and that was the arguments that I would
8 hear kind of playing out in the different discussions with the different groups, was that
9 basically, like -- when we were there with Ali in Atlanta, that was kind of some of what I
10 was, like, observing, is that Stewart's like, "I'm not going to associate with the extreme
11 right. It's just not going to happen. So there's a line I'm not going to cross."

12 Q But in terms of brokering the groups on either end of that line, was it more
13 of an organizational fusion that folks like Mr. Alexander provided?

14 A So it was -- basically, there were assets of Stone that fell on that more
15 extreme side, and Stewart was not going to provide security or assist them, or he didn't
16 even really want to be associated with them at events. So that was one of the issues.

17 Like, so, if you remember the November rally, I was telling you that, when I got
18 there, I ended up kind of sucked in with Alex Jones and Proud Boys and all of that group.
19 Stewart was not happy with that crossover. Like, he just wanted to kind of have, like, a
20 separation there. Like, not necessarily that they weren't going to be at the same events,
21 right? He understood that. But he just didn't want to be to responsible for certain
22 factions, is what he was trying to say.

23 Q I guess my last followup with this point is, did you ever speak with Stewart
24 about why he was comfortable being at the same events with these groups?

25 A Well, because not all of us fall in that camp, and there's a hell of a lot of

1 people on the right that were in the freedom movement that have nothing to do with
2 that extreme side of it. Like I said, I fall into that, like, conservative/Libertarian bubble,
3 and that's where they're all at. I mean --

4 Q That's really helpful.

5 A -- that's just the reality of it.

6 So there were -- I'm just saying, it's a scale, right -- let's go with a "scale" -- on the
7 right, just like there's a scale on the left. I think that's fair. And, you know, a lot of us
8 are kind of, like, more mid, tilted to one side than other, right?

9 Like, I'm pro-life because I worked on the border, I've dealt with trafficking, I've
10 saved babies born as a result of an abortion, right, that survived the abortion attempt.
11 And so I fall on the right side for that purpose, but I'm more of a Libertarian by nature.
12 I'm not in the authoritarian bubble. Let's just put it that way.

13 Q That's helpful.

14 That's all I have right now. Thank you, [REDACTED] and Ms. SoRelle.

15 BY [REDACTED]:

16 Q I guess, going back to Ms. Marsha Lessard and Ms. Bianca Gracia, who were
17 they associated with? Was it Mr. Stone and Mr. Alexander? Or just tell us how they fit
18 into the puzzle.

19 A So, basically, I think somewhere -- these groups just all formed over, like, the
20 years, right? So it's kind of weird when I look back. Like, they all just kind of knew
21 each other from different rally series, from different events, different whatever.

22 And so, I mean, I don't believe that she falls -- like, I don't think that she falls in
23 that extremist bubble, but she does associate with Enrique. Which, I didn't find out
24 until, like, February or March that Enrique was actually associated with Latinos for Trump.
25 Like, I knew they knew each other, but I didn't know he was actually, like, active in the

1 organization or whatever they are.

2 Q Got it. And then --

3 A So --

4 Q Sorry. Keep going.

5 A Oh, no, that's all I was going say. So, basically, all of these people have,
6 like, these little, like, tie-overs to each other, right? So it's like, you can tie Bianca to
7 Enrique, you can tie Enrique to Roger Stone, you can tie Enrique to Ali Alexander. But
8 you can do that on all sides. But what I think everybody misses is that there's, like,
9 a -- that's the center point, right, but there's, like, spirals off of that, and those factions
10 don't necessarily get along. It's just the center point.

11 We -- I just -- I feel like I ended up kind of just, like, sucked into weirdness.

12 Q And the center points, again, just to reiterate, is Mr. Stone, Mr. Jones, and
13 Mr. Alexander. Is that correct?

14 A Yeah, that seemed to be --

15 Q Mr. Enlow, too, is in that center point?

16 A So Enlow was the one that crossed over with 1AP. And so after Atlanta is
17 when I started realizing that you've got, like -- basically, this 1AP was the security
18 for -- which was Yoda and Rob Lewis and all of them, right? So that's who I met that
19 night. And they were doing the security stuff, and they were the ones traveling with Ali.
20 So, like, they were that, like, tight inner circle.

21 And then what they would do is, if there were speakers or when they were
22 orchestrating events, then they would spider into Proud Boys or Oath Keepers.

23 And then they would let, like, the medical freedom groups -- these were, like, the
24 speaker crowd, right? Like, the Latinos for Trump, Blacks for Trump, and then, like, the
25 medical freedom. Those were the speaking events. And then you had the security

1 events, which would've been, like, Proud Boys or Oath Keepers.

2 And the midpoint to all of that was Ali, 1AP. Because they weren't necessarily
3 providing the security to the speakers, right? They were protecting that inner bubble.

4 Q Okay. No, that's --

5 A That was the -- that's what I figured out in Atlanta, is that that was your core,
6 and everything spidered off of that.

7 Q Gotcha. That's helpful.

8 And then these are just -- I mean, I just want to understand how these individuals
9 fit. You haven't brought them up, but does General Flynn fall in this connection piece?
10 Like, where does General Flynn fall in?

11 A So General Flynn is then the one that's kind of over that. So, as time goes
12 by, I start realizing the controller to 1AP is General Flynn.

13 Q So General Flynn with Mr. Enlow? I guess, what's that relationship?

14 A It's not just Mr. Enlow. So you basically end up -- at every event that
15 General Flynn's at, you've got 1AP. You basically end up with -- Staci Burk, if you talk to
16 her, you understand that it was 1AP that was acting at the direction of Flynn. That's
17 what this turns out to be. Flynn is the one coordinating. Bianca, after that. So I'm
18 watching that Flynn is the one coordinating; then transitioning into, like, a giant speaking
19 thing and all of that stuff.

20 I end up excluding myself from all of that, because I have already concluded that I
21 believe that Sidney Powell really screwed up and it was intentional, because nothing was
22 matching. So anything I could tie to Sidney Powell, at that point, I knew was not
23 something I was touching with a 10-foot pole. And since I knew Flynn and Sidney Powell
24 were close, then I started realizing 1AP was close to them.

25 So, by that November rally in Atlanta, I was already starting to go, like, okay, this is

1 weird. This is all, like, one giant bubble, right? With factions, but one giant bubble.

2 And here's our major ringleaders.

3 And then, as you just kind of, like, spider-web out, then I just keep trying to, like,
4 separate myself out from them going forward. But I keep getting trapped by them, but
5 that's a whole other issue.

6 Q And it sounds like --

7 A But I became a target for them.

1

2 [12:18 p.m.]

3

BY [REDACTED]:

4

Q And then it sounds like after those first couple rallies in November, 1AP isn't really associated with Mr. Alexander and others anymore as well. Is that correct?

5

6

A No. They still stayed there, because even when I went to the -- in November, I go to -- shit, they're out in Arizona with them.

7

8 They're all one group. This is the reality, as everybody has to understand. This is one group. They travel together. Like, 1AP is associated with them. And every event they do -- and like the ReAwaken tour, it's 1AP that's there, and all of those other people come into play under that umbrella.

9

10

11

12

And the orchestration is done through Flynn for that, but you still have the ties in. You still have Roger Stone there. You still have the Latinos for Trump there. You still have the same factions all participating in the same events, even to this day. That was in existence from before I walked onto the stage.

13

14

15

Q And we saw that the Oath Keepers, for example, were providing personal security details to Mr. Stone in this timeframe.

16

17

How did that come about? Like, how did the Oath Keepers start providing a personal security detail for Mr. Stone?

18

19

20

A So that's where they get ahold of -- and if you talk to some of the members of Oath Keepers, especially the Florida chapter, they will tell you that they end up crossing over more so than Stewart does with the Proud Boys bubble down in Florida, because they're doing Florida events.

21

22

And then Ali and Roger Stone start just kind of like sucking them in for private detail stuff, so that you see them at, like, the Christmas party and stuff like -- or whatever,

23

24

25

1 at Stone's house or whatever.

2 Stewart is told, like I told you at the beginning when you asked me what the
3 ranking aspect or, like, how much control does Stewart have over the, like, the local
4 chapters, that's where you see that Kelly Meggs will send -- well, I don't know that it still
5 exists today, and I never had it -- but Kelly Meggs sends Stewart a message somewhere in
6 there and says, we're going to help out with private security down here for Roger Stone.

7 And Stewart's like, okay, whatever. It's not like he's directing or coordinating it.
8 It's Kelly just saying, hey, this is what we're doing down here in Florida.

9 Because that's what I was saying. All he asked is, if your local or your State
10 chapter was doing something, just notify him. And he didn't direct it. He didn't get
11 involved in it. He just wanted to be in the loop in case something happens.

12 Q So Mr. Rhodes, to your recollection, was somewhat tracking that Mr. Meggs
13 down in Florida may have been crossing over to work some events with Proud Boys and
14 Mr. Stone?

15 A Right. But it was because that's where they were doing more Stop The
16 Steal series down there too, right?

17 Q Right. No, that makes sense.

18 Mr. Prasanna, I believe, has a few follow-up questions for you.

19 BY [REDACTED]:

20 Q Just wanted to return to Tim Enlow.

21 To your knowledge, was he a leader of 1AP, or just in the same group, kind of
22 broad group of people?

23 A He seems to be pretty prevalent in the group. I don't know because I don't
24 have a relationship with 1AP. I just know I see a lot of Tim Enlow. Does that make
25 sense?

1 Q Yeah. And --

2 A So I'm telling you who I can identify because they seem to be prevalent in a
3 lot of stuff. Tim Enlow was one of them. And I know he's the one that's with Alex
4 Jones.

5 So that could be why, because if you look at who was at what events, and I told
6 you, like, the Nick Fuentes bubble was kind of pushed apart, but Stewart was closer to
7 Alex Jones, right?

8 So Tim Enlow was the one caring for or the security for Alex Jones, and he crossed
9 into the 1AP team, which is how the connection to General Flynn and to Roger Stone and
10 Ali Alexander.

11 So that was what I was seeing, was a lot of Tim Enlow and a lot of coordination by
12 the same -- like Ali and Yoda and Rob Lewis. But then I was always seeing Tim Enlow
13 too. So it was kind of like the little bubble I was watching.

14 Q Got it.

15 So just to make sure I understand, did you see Tim Enlow without Alex Jones, or
16 was it always in conjunction with Alex Jones?

17 A Well, that was always kind of the same events, right, so it was like you would
18 see him with them.

19 Q Got it.

20 A But it was always, like, the same people.

21 Q And Rob Lewis, was he at all these events too?

22 A No. That's the weird part. I guess it's probably because Stewart -- the
23 only connection Stewart really had to this group was with Alex Jones, right? Like, that
24 was the major connection to Roger Stone.

25 It wasn't -- so I would see, basically, they, like, for the December rally, they'd given

1 that, like, little nod for Flynn or whatever, but you still have the same characters, cast of
2 characters around him from 1AP, right?

3 So it's like Stewart always was trying to find, like, the Alex Jones side of that
4 faction because that was kind of like his only connection that kept him from crossing over
5 to the other side.

6 Q Got it.

7 A If that makes sense. I know what I'm trying to say.

8 Q How did Stewart and Alex Jones get connected in the first place?

9 A Stewart needed media. And, you know, if you've noticed, like, they didn't
10 necessarily treat him, like, with the greatest of -- this is where I hate the right and the left
11 right now, because it was a game they played.

12 So you had one that was like, oh, we're going to demonize this whole side, and
13 then Stewart got lumped into the we're going to demonize this whole side. I mean, you
14 can just google it, right.

15 And so Alex Jones becomes, like, his primary platform, which in reality Alex Jones
16 is really controlled by a bunch of the same freakin' people, and it's such a stupid game,
17 such a dumb game. Whatever.

18 Q Got it. This is really helpful.

19 Mr. Childress?

20 BY [REDACTED]:

21 Q Yes. One additional name with 1AP that we were just wondering.

22 Mr. Scott Chafian, did you ever see him working with 1AP?

23 A So I know that -- yes -- well, yes, but it was more that -- like I said, you had
24 basically -- see, that's a very valid point, and I hadn't really thought about that. Yeah,
25 because they were the ones providing security for that faction, which we never crossed

1 over with.

2 Q So Women For America First was a separate faction that the Oath Keepers
3 never really crossed over with?

4 A They did -- because they did the security for them -- no, that was Virginia,
5 the ladies group out of Virginia. I'm trying to think if the -- no, I don't think they did.
6 Because, look, I know how they were coordinating events, but there were certain groups
7 we never crossed over with.

8 Q And Women For America First was one of those groups?

9 A They were at the stage, like, they'd be at the event, you know what I mean?
10 But there was not any, like, communication that I'm aware of beyond, like, the little
11 bubble communications, right? But there wasn't, like, a relationship there.

12 Q Got it.

13 A Does that make sense?

14 Q No, it does. And we've talked about somewhat connectors of these
15 different factions.

16 I guess, who was the connector for Women For America First and that faction, if
17 there was one?

18 A It would have been 1AP.

19 Q Okay.

20 A And Ali Alexander.

21 Q Got it.

22 A Same damn center cog. I mean, it's true.

23 Q Did Mr. Rhodes have any concerns with providing security for Stone down in
24 Florida, for Mr. Stone?

25 A I don't think so. I mean, he had committed, basically, to doing the Stop the

1 Steal series. And we knew -- I mean, like you can tell, Friends of Stone, right there, like
2 it's all right there. Like that was the organization that was creating some type of rally
3 events, right, and speakers, and doing all that stuff.

4 So I don't think it was like I'm concerned with you doing that. I think Stewart was
5 like, great, you're still helping the Stop the Steal stuff. I'm not going down there, but
6 have at it.

7 Q So Mr. Rhodes was -- his mission -- and I'm using the word mission, like, from
8 a military standpoint, not from -- just his mission was to provide security at the Stop the
9 Steal rallies, correct? And he --

10 A That's what -- yes.

11 Q Sorry. Keep going.

12 A That's what I was going to say. That's what that was for, right, is that's
13 what the whole purpose of those chats and stuff like that was for, was organizing the
14 different events in the Stop the Steal series.

15 And so that was what he was -- you know what I mean? Like he had committed
16 to, like, assisting with that because it was a -- so national, like I said, they'll do bigger
17 events, right, they'll try to do events whether -- you know.

18 And Stewart's thing, love him, hate him, whatever, he's a smart man. And he's
19 very pro-constitutional rights, and First Amendment, and any of the things associated
20 with it he's going be on board for.

21 That doesn't mean he has to like all the players. He's just trying to make sure
22 that these constitutional rights are protected and that people are able to do that, right?
23 Which is actually what this stopped, ironically, the 6th stopped that, because then
24 everybody got scared.

25 Q Right. One thing that we've been trying to figure out, we see around this

1 time -- when I say this time, I'm talking about right before the November 14th rally in
2 DC -- we start to see Mr. Rhodes discussing the Insurrection Act, specifically the first
3 mention we see is November 10th.

4 Did that idea come from Mr. Stone? Or, like, how did that idea about the
5 Insurrection Act come out?

6 You're raising your hand?

7 A Me.

8 Q Okay. So you.

9 Help us -- like, why is the Insurrection Act even being discussed?

10 A Because if you're looking at what I'm seeing on the ground, it's chaos. It's
11 bullshit. It is people manipulating the data, not even using what we're using on the
12 ground. Like, I'm getting data that says one thing, and Sydney Powell and all of these
13 cases are doing something completely different.

14 And all I wanted was to stop it, like just stop the games, because I don't know
15 what the hell's going on. But what's happening is not legitimate.

16 That's why you see them getting disbarred. They should be getting disbarred.
17 They lied.

18 And that was my point at that moment, was I'm like, Stewart, how do we stop
19 this? Because they're lying to the courts. They're lying to everybody. They're
20 misrepresenting the information. They're not even using the real information because
21 I'm talking constantly to legitimate witnesses that were on the ground. And that was
22 the problem I had.

23 So the Insurrection Act, it was actually my fault, because I was trying to find a
24 mechanism because I could tell very early on that they were lying and manipulating the
25 data in some of the early stuff they were saying.

1 Q And by they, you're talking about Ms. Powell?

2 A Yes, and Rudy Giuliani, and all of them. Yeah.

3 Q So what was the -- I guess, what would have been the end result or the
4 purpose of invoking the Insurrection Act in response to Ms. Powell lying?

5 A Because here was my problem, and this is the problem, this is why I still
6 assist the Feds in every way, shape, form, or fashion that I can, right, is because my
7 problem when I got back to Texas was, I was like, look, the RNC is dirty in this. Because I
8 told you, I recorded the RNC try as the one that was negotiating the ballots.

9 And my problem was, is I got back to Texas, and I was telling Keet Lewis and ASOG
10 and all of them, I'm like, look, the RNC has done something, and I need somebody to just
11 stop this so we can figure out what happened. Because I couldn't figure it out.

12 Because they were blaming the left, and I was like, wait a minute, I'm seeing
13 something else. Everybody is seeing something else. So why are we sitting here
14 playing this game?

15 And then later I figure out, because Keet Lewis gets drunk, and he says, well,
16 Stacey Abrams is the one that screws us in Georgia. Because the reality was that
17 Republicans had given the executive over to the Biden camp, to the Democrats, and they
18 were supposed to get the two Senate seats out of Georgia, and Stacey Abrams screwed
19 them at the last minute. And that's what the problem is. So quit worrying about this
20 stuff.

21 So this was what I'm saying. I was telling the truth, and I knew something was
22 wrong. And if we're not careful, we're going to lose it all. And it's these parties that
23 did it.

24 Q Yes. Sorry.

25 A I'm sorry. I'm pissed.

1 [REDACTED] No, I understand Ms. SoRelle. We've been going for a little over
2 an hour. So if you want to take a -- let's take a 5-minute recess and come back a little
3 after 12:35 p.m. eastern time, okay?

4 Ms. SoRelle. Thank you.

5 [REDACTED]. No problem.

6 [Recess.]

7 [REDACTED]. I'll turn it over to Mr. Prasanna.

8 [REDACTED]. Thanks.

9 BY [REDACTED]:

10 Q Ms. SoRelle, I wanted to follow up on the Insurrection Act. And you
11 mentioned that you had discussed the idea with Mr. Rhodes, right?

12 A Yes.

13 Q So from -- my understanding is that Mr. Rhodes was talking about the
14 Insurrection Act in the context of threats posed by Black Lives Matter and antifa and kind
15 of unrest in the streets.

16 So can you help me understand where the difference is -- if there is a
17 difference -- between what you were talking about with Sydney Powell and what our
18 understanding of Mr. Rhodes' interpretation of why the Insurrection Act was necessary?

19 A So I had gone to Mr. Rhodes and asked him, because I was just like -- I was
20 watching the people get defrauded. I was watching millions of dollars getting funneled
21 into Sydney's group and all of these groups, right, and I was like, they're lying. And I'm
22 like something's seriously wrong with that aspect.

23 And Stewart -- and so I was like, I don't know what he needs to do at this point.
24 But Stewart was like, well, I had told him last summer when all the stuff was going on in
25 Portland and all of that, that that was -- so we had just kind of discussed that stuff.

1 I don't know -- I mean, I get it, too, because, I mean, that's one of -- a lot of the
2 right's talking points, and they're absolutely right. Like, you know, they're slamming
3 Stewart's group, although they're not defending Stewart -- for a reason.

4 But they're slamming the 6'ers for something that's a lot more complicated than
5 everybody wants it to be. And yet you had people literally try to burn people inside a
6 Federal courthouse in Portland.

7 And I know that because I actually am friends with Jim Lowe (ph), who was getting
8 security from Portland Proud Boys. So I've actually talked to them since all of this.
9 But -- to get a better grasp on what happened in Portland.

10 But I understand what Stewart was saying, is he was like there was a problem then
11 and nobody was doing anything about it. He's like, all you can do is just say the same
12 thing, is that I'm like, there's a problem here.

13 Because I told you the very first person I made a call -- like as soon as I got to the
14 hotel room, I was calling Shawn Flynn, and I was communicating with, like, our hierarchy,
15 trying to say, look, there's something going on. This is critical infrastructure. And it
16 was a shit show at Cobo Hall.

17 So I don't know -- and I had that recording where I sat there and listened to the
18 guy talking about ballots. I didn't even know -- as a matter of fact, I directed the RNC
19 and all of those camps because they were supposed to be doing the legal case and I didn't
20 want -- I wasn't a Michigan resident. So I was trying to tell them, hey, go get the video.
21 Which doesn't get produced later. And I think Gateway Pundit is one, not that I'm a fan
22 of theirs.

23 But they're the ones that released the video from outside. And I'm like, that's
24 what I had gotten the forms for, sent them to him, and said, hey, you need to go get
25 these videos like very early on, like in the first 3 or 4 days after the election in Michigan, is

1 I was like somebody needs a Detroit resident or at least a Michigan resident to, like,
2 request this information. It doesn't get done until later.

3 But what I'm trying to say is, I was seeing chaos. There was no way to stop the
4 chaos. There was no platform that wasn't full of crap at that point. And it was really
5 frustrating.

6 So I was like somebody just needs to put a stop on this and actually get to the
7 bottom of what's going on. And I don't know who that would have been because it was
8 all the same people. But all I could see was they were pushing the people down the
9 wrong path, and it was really frustrating to me because I knew that nothing was lining up.

10 Q So if Trump had invoked the Insurrection Act, what were you hoping would
11 be the next step after that?

12 A Well, ironically, I'm stupid, because at the time I thought that Flynn and all of
13 them were like on the right side of things, right? So I was like I don't know, like, there's
14 got to be some kind of mechanism, military.

15 And Stewart was trying to come up with like ways. Like, we were, we were
16 brainstorming, like, how do you halt something to get to the bottom of what's going on?

17 And it's not even the bottom of what's going on on the, like, you know -- see, you
18 got to understand, I go back to Texas, and I meet with Keet Lewis and Russ Ramsland, and
19 I'm telling them, like, this is what happened in Michigan. And they're telling me to shut
20 the hell up.

21 So I'm pissed off at the Republicans because I don't understand what's going on.
22 If this was a Republican op, fine, tell me that. Just tell me something so I'll quit worrying
23 about why people are, like, literally getting millions of dollars off the back of American
24 people and defrauding the public and causing chaos, causing confusion, causing people to
25 get agitated and irritated, and they're lying to them.

1 So it was -- I just wanted it to stop.

2 Q Got it. So when Stewart was talking about, you know, calling on Trump to
3 invoke the Insurrection Act before the November 14th rally in D.C., one of the other
4 things he -- he posted something on the Oath Keepers website that talked about the
5 Insurrection Act.

6 A Right.

7 Q He also quoted somebody from Serbia writing about storming the
8 Parliament in Serbia and the people winning.

9 Do you have any idea of the context for that or why Stewart included that?

10 A So this is what's really funny, if you look at this from an operational
11 standpoint, right? There's so much stuff that was directed to me and Stewart that in
12 hindsight I'm like holy shit.

13 Like they were just -- like that guy -- I was still in Detroit when he got that video.
14 And I don't know who he got it from. I think it was from Alex Jones and that group
15 because that's who he talked to a lot.

16 But like all of these things -- because that guy was actually saying be careful
17 America, they're doing to you what they've done to us, right? Lo and behold, after I
18 start looking at it, I'm like, well, shit, here's a color revolution. This is what the guy was
19 warning about.

20 This is what Stewart's starting to process. He just is poorly saying it, and he
21 doesn't realize he's in the camp of the enemy when he's saying it.

22 So he's getting stuff fed to him, right, and he's processing the same thing that it
23 takes me a lot longer because I have zero military background, that he's starting to
24 understand that there's something deeper in play.

25 Which I already knew because I was sitting -- I told you at the very beginning, I'm

1 sitting there at the city attorney in Hood County -- in Granbury, in Hood County, and the
2 paperwork and the lectures we're getting from the Governor and the lectures we're
3 getting from -- so then I start digging.

4 But the reason for all of this new madness and the new normal and all of the new
5 things is I'm like, what the hell is going on? Like we're moving everybody. Lucky for
6 Granbury, look at you, you're at the end of the -- you're at the very side -- and they've like
7 got a little chart of like a PowerPoint of the new Texas triangle where we're going to
8 move all of our resources, which is fine.

9 But just tell the people the truth. Nobody was telling the people the truth. And
10 we don't know what that even means. And nobody's voting on that issue, right?

11 So all we were trying to process was something's gone wrong. We're in some
12 type of revolution. We don't know what it is because I sat through it, where they're
13 telling me how we're going to change the future of the country.

14 I'm telling this to Stewart because we're doing the open Texas rallies. This is the
15 information I'm passing on. I'm like, we've got to stop these lockdowns because we
16 need to have a voice in this platform.

17 I don't know what it means. But either way they need to tell us the truth, we
18 need to be on top of it, because otherwise the people get lost in the end of it, right?

19 They're making decisions, and we have no clue what they actually mean. But I'm
20 getting the reports on it. So all Stewart and I were processing as these months went on,
21 and not even at the same time simultaneously, but that's why we stay in contact
22 periodically, is because we're watching the evolution and we're trying to figure out what's
23 going on.

24 We've got this COVID virus. We've got lockdowns. We've got blue States that
25 are completely locked down and you're doing contact tracing in. You've got red States,

1 we opened back up within months.

2 You've got all of these things coming into play. And I've sat through this stuff
3 where they're telling me how they're about to change the format of our country, and I'm
4 just trying to figure out what the hell is going on.

5 And so he's taking pieces he's witnessing, like up in Portland. I'm taking pieces
6 that I'm witnessing in Texas. We're trying to figure it out, get to the election. The
7 election's an absolute shit show.

8 And then, on top of that, they're lying about the election. And it is a big lie.
9 You're absolutely right. They call it a big lie. You're right. It absolutely was.
10 Fantastic, media, you picked it up, because they were lying. Everything about what was
11 coming out of their mouth was bullshit.

12 And what we continued to watch, and I watched all these people pop up from
13 Italy, and you had like Frankfurt gunfights with Gina Haspel, and all of this bullshit they're
14 spewing to the American people, none of which is true because I've now made friends
15 with people in intelligence. And they're like, yep, it's bullshit. Yep, that's bullshit too.

16 And I'm like, okay, you got to do something. We got to stop. We need to
17 pause. The people need to be caught up, and they need to understand the truth.

18 What we do as a people, as a collective country, after that, great. It's our choice.
19 It's our vote. We have a Constitution. We have a republican form of government,
20 right? Supposedly. And that's not what we're getting.

21 So I just wanted -- and all I was asking Steward to help me with was just help me
22 figure out a way to just put a halt, just a stop, so we can all catch up and get on the same
23 page. Because the parties are lying. The media is not telling us the truth. No one is
24 giving us a bigger picture here.

25 That's it.

1 Q Is it fair to say that you and Stewart were pretty synched up on this?

2 A Not -- so he had different -- synched up in the sense that I was looking for
3 mechanisms to try to figure out how to put a halt somewhere in play.

4 And I don't want violence. I don't. I didn't even know that was what was going
5 on on the 6th on the other side. I never went over there. I saw pockets.

6 But I just wanted peaceful resolution, and I just wanted the truth to be out to the
7 people so they understand what's happening.

8 And that was both sides. That wasn't even like -- it wasn't even -- I mean, at first
9 I'm listening to Sydney Powell, and I was getting like, okay, Kraken, okay, okay. And
10 then it's like, none of this is real.

11 And then as I started processing that, I'm like, what are they doing, like, why are
12 they lying to everyone?

13 And it got frustrating. And it was just like, how do we stop whatever's happening
14 so we can assess it? Because, I mean, that was it.

15 And even -- I mean, the stupid idiots on the ground. I mean, I don't know what
16 Powell knew, I don't know what Russ Ramsland and all of them knew. I had no idea.
17 But I knew they knew, just from putting the pieces together, they all knew they were full
18 of shit.

19 Q What did you think President Trump's role was in all this?

20 A I thought he was being misled. I thought he was being lied to. And --

21 Q By who?

22 A Sydney Powell, and all of them. I mean, I may be wrong, I mean. But I
23 just knew he was spewing the wrong things. Everybody was spewing the wrong things.
24 And they were demonizing the right over the big lie, and I was like, yeah, yeah, they kind
25 of are, right? And I knew the people who were going to get hurt. They were being

1 taken advantage of.

2 And the truth is relevant, you know? And I know I'm crying, but it just is
3 frustrating because you couldn't say it. There was no one to say it to. Because once I
4 went up on the RNC, like, I got blacklisted. They wouldn't talk to me. Like, nobody
5 would talk to me.

6 Thank God for actually leftist media. That's what's so funny in this, is I end up
7 befriending after the 6th the left, because the left is the only one that would actually hear
8 me out, more mainstream. Even though they weren't there, they were still listening,
9 and then over time they started processing what I was saying.

10 And they were like, okay, we kind of see what you're saying. And then like,
11 thank you, that's all I was wanting, was just the truth, and not to be put in this situation
12 where I'm the bad guy or where Stewart's the bad guy. Because we were just trying to
13 get the people the truth, and that was not what they wanted.

14 Q Got it. Do you want to take a moment?

15 A I'm not perfect. They're stupid on so many levels. They're idiots.

16 Q Who?

17 A The Oath Keepers, you know? I mean -- but they weren't bad guys in this.
18 They were in a defensive posture. They were afraid because they were watching the
19 same thing.

20 And it's my fault. That's what I've tried to say. I said it to the FBI because I was
21 telling them the truth. I'm like, this isn't real. This isn't real. They're lying over here.

22 But they weren't going in an aggressive fashion. They were just getting paranoid,
23 and because of the same reason. We're looking at what happened in Portland. We're
24 looking at what happened with the lockdowns. We're looking at what happened in all of
25 the State levels. We're looking at this bigger picture. We're trying to put the pieces

1 together.

2 That's why I dumped all that crap on you, is because it's like, look, don't tell me
3 they don't have a plan. How many people, like, just make 50,000 fricking playbooks on
4 something without a plan for something? But I don't know which one they're using. I
5 don't know what their ultimate plan is. You can look at the WEF website. I don't
6 know.

7 But the whole point is, is if you're going to take away our constitutional Republic
8 by coordinating with a global group, you have to tell us about it. We deserve that.
9 We're citizens of this country, and we have a constitutional Republic and it's a
10 representative form of government. You have a duty affirmatively to tell us what you're
11 planning to do to us other than just cut giant checks to corporations, right, with the
12 military-industrial complex.

13 So, yeah, that's why we're the bad guys, because we got it, we understood, and
14 they needed to shut us up.

15 Q Got it.

16 A It's not that we did anything wrong.

17 Q This is all really helpful. I just want to see if any of my colleagues have any
18 follow-up questions. Otherwise, I'll turn it back to [REDACTED].

19 [REDACTED]?

20 [REDACTED]. Thank you, [REDACTED].

21 And thank you for all that information, Ms. SoRelle.

22 One question that's occurred to me a couple times hearing you speak that I want
23 to get a clear understanding of.

24 [REDACTED]. [REDACTED], your audio isn't coming through clearly.

25 [REDACTED]. Is it working now?

1 The Witness. Yes.

2 You're muted.

3 ██████████ I'm sorry. I don't know if you can hear me now.

4 The Witness. I can.

5 BY ██████████:

6 Q Great. Sorry about that. Thank you for that explanation, Ms. SoRelle.

7 And I think one question that occurred to me while you were speaking was I
8 wanted to know what you think the truth was, if you could just kind of explain to us what
9 you think happened during the election and what you were trying to -- what message you
10 were trying to communicate out to the world in some of the efforts you were talking
11 about with ██████████

12 A So one of the points was just basically, like, if you look at just Detroit -- and
13 then I ended up in Atlanta, right, so I talked to some attorneys in Atlanta that were
14 working on the stuff.

15 And they were in the same boat that I was. They were like, we don't understand
16 what Lin Wood and Sydney Powell and all of these people are doing. Like, we don't
17 understand. They're, like, getting all this money and then they're not even discussing
18 the issues that were being identified by the people that were producing affidavits there,
19 too.

20 And so we kind of were like, what the heck is going on?

21 So it's not like this came in a vacuum where I'm just like, hey, let's just invoke the
22 Insurrection Act for fun. It's because I was communicating with all these different
23 people and all of us were seeing the same thing. It was like, you had allegations of
24 thumb drives. You had allegations of ballots. I knew about ballots.

25 Georgia was claiming they had similar situations. There was a couple of people

1 that were in -- one was in Arizona. And he was like, I think it's a ballot issue. That was
2 from Texas. He was an attorney. There was another attorney that was in
3 Pennsylvania.

4 And all of us kind of like on the backside were like, shit, this is a ballot issue, but all
5 we're listening to is Dominion, right? And we're like, okay that has nothing to do with
6 the fact that we're seeing tons of ballots being injected into this.

7 And I'm not saying it would have changed the result. I'm not saying that. What
8 I'm saying is, is there was enough on everybody's radar that we knew that the truth was
9 being manipulated, and people were fundraising off of it, and they were setting people
10 up.

11 And you were watching the hostility between the media sides, and nobody was
12 actually nailing what was actually being seen, right?

13 I mean, there ended up being like just chain of custody issues. Like for me, I saw
14 luggage. I recorded tons of video of luggage and coolers and, you know, things like that.
15 I don't know, maybe they were legitimate. But you know what the problem was?
16 There was nobody inspecting it. So I don't know.

17 So we either have secure elections or we don't. And it's not even about my vote
18 necessarily. I'm not bitching because of this one exact election. What I started
19 realizing is, holy crap, everybody's manipulating these. The people aren't being told the
20 truth. And who are we covering for? And does it make an actual difference? I don't
21 know. But it's something you and you and you and everybody else on here should want
22 to know the answer to.

23 Q Definitely.

24 A We need to know.

25 Q [Inaudible] to clarify some of that. So if I could just distill what I think I hear

1 you saying, that you were seeing evidence of election fraud through your work in
2 Michigan and in other States, and you did not believe that some of the attorneys working
3 with President Trump's campaign, Sydney Powell, Giuliani, others, were correctly
4 identifying the fraud?

5 A They weren't. And they were creating like crazy freakin' narratives. At
6 first I was like, oh, okay, like, Kraken. What's Kraken?

7 And then we're like -- and then I find out about Hammer and Scorecard, right,
8 through Sheriff Arpaio and Michael Zullo. And they tell me about all of their stuff with
9 Dennis Montgomery. They send me the interrogation video. So I watch a clip.

10 They don't send it. So he plays it for me. He won't send me his actual -- he
11 sends me some stuff, but -- and I listened to him talk about where he's done this
12 historically with politicians and it's a honey pot, and, you know, like he works with Federal
13 agencies.

14 And I'm not saying the Feds are bad, but there was -- but after that, because I'm
15 listening to Hammer and Scorecard in November, December, I'm already going, I don't
16 know what the hell any of this is. This has nothing to do -- I watched the Antrim County
17 report, which had nothing to do with the affidavit that was sitting in my -- well, actually
18 that I had mailed out that we had sent through the central processing with the lady that I
19 had talked to on the phone.

20 She was telling me a totally different story. So she's still calling me saying, I don't
21 know why they're not dealing with my issue. And I'm like, I don't know either.

22 And so it was the chaos of it. It was the fact that the witnesses were concerned.

23 Q So then hearing you say that I think helps me understand your conversations
24 with Mr. Rhodes about the Insurrection Act. So I'm just going to try to distill that too.

25 Was the idea of having President Trump invoke the Insurrection Act in your ideal

1 scenario helping give President Trump room to figure out what exactly was going on?

2 A That's all I wanted, was a pause. I just wanted the truth. That's it. I
3 mean, it's real easy. All of this is about -- I feel like the people have been manipulated
4 and nobody's getting the truth still today.

5 Q Uh-huh.

6 A I mean, you're seeing some of it.

7 God, why am I crying? Because I'm so mad. Because this is like 2 years of
8 frustration.

9 Q Yeah.

10 A I just wanted a pause button, you know, just a simple, hey, breathe. Let's
11 figure out what the hell's going on and why the media and why Sydney Powell and why
12 General Flynn and why all of these people are doing weird, crazy stuff. Like I just don't
13 understand it. That's it.

14 Q Yeah. That makes sense.

15 Was there a conversation between you and Mr. Rhodes about what the pause
16 would look like? How long the pause would last? What President Trump would be
17 doing during the pause?

18 A I don't know. I mean, that's not my job. Like, it's not. I mean, I'm
19 reading law trying to find something. But I'm not -- I've never worked for the Federal
20 Government. I don't know what avenues you can use. I don't know what things we
21 can do.

22 All I know is that these are mechanisms that the executive has or options that are
23 on the table or potential for trying to resolve.

24 And if you look at it from my perspective, because I'm the one that turned over to
25 all of the camps the CTCL crap at the very beginning because I sat through those when

1 they were trying to fund our elections in Texas, all I was trying to say is like these are ways
2 that I've seen where the legal violations are occurring or where things are being
3 manipulated.

4 And I don't know what the answer is. I don't know how much damage it did or if
5 it was beneficial to anybody. But what I do know is that you had counties in Texas -- like
6 it's even the reverse on that. Even if the left is completely ballot stuffing, you've got
7 rights that's not ballot stuffing nor do they have an ability to because in red counties you
8 don't have the drop boxes.

9 Q Right.

10 A And so all I was looking at is this equal application, this dilution debasement.
11 And I don't know who the bad actors are because, like I said, it was the RNC at the
12 beginning that I was like, what the hell are you doing? It was -- I didn't know. And
13 nobody was looking. They were throwing everything around, but nobody was slowing
14 down to look at it. That's all.

15 Q So why did you think that President Trump would be someone who would be
16 a good actor and look at the fraud that you were seeing on the ground?

17 A I don't know.

18 Q Okay.

19 A I don't. That's what I'm saying. All I was trying to do was just put like the
20 stop button, right, like just let me see what's happening, right?

21 Q And you saw that as a last ditch effort to have those legal options available
22 as part of the Insurrection Act, to have those processes put in place to see what was
23 happening?

24 A So I worked on the Texas case with, like, 30-something attorneys. I worked
25 on -- so you've got to look at it from my perspective where I'm working on everything

1 everywhere, right? Like I'm -- my hands are like in everything, and there's groups of us
2 going, what the hell is going on?

3 And none of us can gain traction. It's not like there was a big pocket of attorneys
4 where -- we had no clue why they were arguing what they were arguing.

5 So we're trying to figure out a way around to circumvent the chaos that's being
6 created, and we're getting shut down on that side too.

7 So there comes a point where it's like we just need to know what's going on. I
8 mean, I don't know. Like, I don't know who's behind all of this garbage. We don't
9 know. That's the point. Somewhere the people deserve the truth, and a pause should
10 be taken. That's it. That's all.

11 Q That's really helpful. Thank you for sharing all of that.

12 I'll hand it back to [REDACTED]

13 [REDACTED]. Thank you, [REDACTED]

14 BY [REDACTED]:

15 Q Ms. SoRelle, I wanted to get back to the November 14th rally in D.C.

16 You said earlier, and correct me if I'm wrong, you all stayed at the Hilton Garden
17 Inn in Vienna for this rally as well?

18 A Yep.

19 Q However, before the rally, it sounds like you all went to Mr. Caldwell's farm
20 in Berryville, Virginia?

21 A I'm sorry. No. The November rally, we stayed at -- and I do not know
22 their names -- but Whip and Whipit, me -- okay. So Jeff Morelock --

23 Q Oh, we know who you're talking about when you say Whip and Whipit.

24 A I'm sorry. I was like I had only Whipit. And I was like that's not
25 even -- yeah.

1 So anyway, we stayed at -- they were somebody with the Republican Party in
2 Virginia.

3 Q Okay.

4 A And I don't know what the heck their names are. I think they get divorced
5 after that.

6 Q Where in Virginia was this?

7 A So Marsha Lessard lives in like Lovettsville or something like that. And they
8 lived, like, maybe 15 minutes from there. So it was outside, it was like in rural areas, like
9 it wasn't necessarily in a town.

10 Q Right.

11 A But I know that when we went to Marsha Lessard's for dinner that was only
12 about 15 minutes from there.

13 Q About 15 minutes away from Lovettsville, Virginia, is where you stayed for
14 the November rally?

15 A That's where it would be. Yeah. That would be right.

16 Q That's great. And where did Mr. Rhodes stay, if you remember?

17 A So he actually stayed -- the guys were all down in the basement. I was
18 lucky I had a room. So they were all in the basement.

19 Q But he stayed at the same house with you?

20 A There was several guys that stayed there. So it was -- I don't want to say
21 leadership because that's not necessarily true, but it was just like -- and I'm trying to
22 remember if Josh James -- Josh James, he was there. But I don't -- I don't know, like, I
23 just kind of hung out with the wife. I don't know who actually stayed in the basement.

24 Q No worries. Who were the guys that were there? You mentioned Josh
25 James, Mr. Rhodes. Who else do you remember, just off the top of your head, who else

1 do you remember staying there?

2 A Whip and Whipit, Rhodes. Josh James was over there. I think that's it.

3 Q That's it?

4 A I think that's it.

5 Q Okay. And to be clear, Whip was not a member of the Oath Keepers, right?

6 Mr. Greene, he was not a member of the Oath Keepers?

7 A No. He was security detail, and he was running, like, the operations for
8 him.

9 Q Got it. Thank you.

10 Also, so when you all went to the rally on November 14th, did you speak at the
11 rally?

12 A Nope.

13 Q Did Mr. Rhodes speak at the rally?

14 A No, because that was part of why he was mad, right?

15 Q Okay. So he was under the impression he was going to speak at the rally
16 on November 14th?

17 A Yes.

18 Q And which one, which rally was he going to speak at? Was Mr. Rhodes
19 supposed to speak at the Freedom Plaza rally or at the Supreme Court rally?

20 A I think it was at the Supreme Court rally, is my understanding.

21 Q And that's the rally where Mr. Jones did speak, at the Supreme -- Mr. Alex
22 Jones spoke at the Supreme Court, correct?

23 A Correct, because I was with that grouping.

24 Q So help us understand who was in that grouping. I know Mr. Alex Jones,
25 you, Mr. Rhodes.

1 Was Ms. Gracia in that grouping too?

2 A I don't remember.

3 So I didn't meet Bianca until later on. Like, I don't meet Bianca physically in
4 person until January 5th.

5 Q So who was in your grouping that you remember from the November rally?

6 A It was Marsha Lessard. It was Charlene Bollinger. It was Alex Jones,
7 Proud Boys. John Shirley was there. Shoot. John Shirley.

8 So a handful of Oath Keepers that came in and stayed in D.C., basically, is the best
9 way I can say this. And then Whip and Whipit, me, Marsha Lessard, Charlene Bollinger,
10 Alex Jones, his entire crew, a bunch of Proud Boys.

11 I see Enrique there. I don't meet Enrique, but I'm just saying he was there. He
12 has like a posse, like a whole group, like there's, like, little Enrique groupies, right?

13 Q Yeah.

14 A So I watched the Enrique groupies. I mean, I was entertained.

15 Q So you all went from this grouping, you went to the rally at Freedom Plaza,
16 correct?

17 A We met up with the group at Freedom Plaza, and then we -- they formed
18 this little box, like rectangular box. They stuck all of us in the middle of it. Whip and
19 Whipit were with the girls, like they were kind of like circulating around the Freedom
20 speakers.

21 And then you end up with basically -- then Alex Jones has his whole posse of
22 group. Enlow was there, like that group, right? So you had some 1AP guys mixed in.
23 I don't realize that at the time, but later I start recognizing them. And then you have,
24 like, the Enrique pocket.

25 So that was it. It was just this group. There was probably like 30 people in this

1 maybe.

2 Q And you all walked to the Supreme Court together?

3 A Yeah. And so they just tried to keep this little box in formation, another
4 military formation for everybody. They try to keep us in this formation. We walk over
5 there through the crowds. It gets pretty nasty. They get up on the stage.

6 I was actually just, like, going to go. I just got kind of, like, thrown in with the fun
7 group. I say that because that's where everybody was. And -- yeah. They speak.
8 And then they go around. And then we just kind of walk around the Capitol, and then
9 down the Mall.

10 Q So who's actually forming the box? Is it Proud Boys forming the box around
11 you?

12 A Yes. It's Proud Boys that form the box. And then Oath Keepers are in
13 with the speakers in the middle.

14 So that's where -- and I know you asked for -- somebody requested the additional
15 information on the Friends of Stone chat where Charlene Bollinger and Stewart are
16 having that conversation.

17 Q Right.

18 A You remember?

19 Q Yes.

20 A So that's what that is in reference to actually.

21 Q Okay. Okay, reference to the box and the security aspect of it?

22 A Yes. So like Stewart, because Stewart's like, yeah, like, that's great, you
23 know, whatever. So he was in charge of Charlene and Marsha and me and then just
24 helping with whatever additional security they needed.

25 Q Okay. And then you also mentioned earlier, I guess, Mr. Jones, Alex Jones,

1 was staying at the Willard.

2 Is this where you saw -- who did you see at the Willard? Mr. Alex Jones?

3 Mr. Ali Alexander? That group was there?

4 A Yes. So there were other people. If you could --

5 Q Just list who you remember that was at the Willard.

6 A There was a big group of people, but they were not people that I knew.

7 But I recognized their names. So they were just people that had been on Alex's show
8 before.

9 Q Was Mr. Alexander there?

10 A Not at that one, no, because that was the one where after I got done with
11 the hotel, I was like, Stewart, where is everybody? And they're like, we're at the Willard
12 having dinner with Alex Jones and his group.

13 Q So we have Mr. Rhodes and Mr. Jones at the Willard.

14 Was Mr. Roger Stone there?

15 A Yes, but he had already gone up to his hotel room by the time I got there.

16 Q Okay.

17 A Because that was actually what was originally communicated, is that we're
18 at the hotel with Alex Jones, and there's Roger Stone and some other people here.

19 Q Got it. Was Mr. Flynn there as well?

20 A Not that I'm aware of.

21 Q Or General Flynn. I apologize.

22 And I guess another question -- this is, it's random, but I just have to -- was

23 Mr. -- how does Mr. Bannon, Steve Bannon, fit into this leader? Does he fit in at all?

24 Do you see him around?

25 A I never saw him ever.

1 Q Got it. Thank you.

2 Do you recall a Mr. Charles Bowman that helped provide security at any of these
3 events?

4 A That name does not ring a bell.

5 Q Okay. All right.

6 Did you hear -- it sounds like you met Ms. Gracia later. But did you hear of any
7 of the Proud Boys flying to this rally on a private jet?

8 A So, yes. I find out from Bianca later that Patrick Byrne is flying either on his
9 plane or is funding. And actually Robert Caron, who was on red team, and Bianca and
10 Enrique. And then Thad tells me about Sullivan and all of these associations, basically
11 that they're using Patrick Byrne for flights.

12 Q So Mr. Byrne was actually funding the flights for these people to go to
13 various Stop the Steal rallies?

14 A Correct.

15 Q And when you say red team, I just have to make clear for the record, who
16 are you referring to of red team?

17 A I don't know who all was on red team. I know that when I first talked to
18 Robert Caron -- now, Robert Caron has thrown around all the names over time that
19 actually give me the heebie-jeebies, but that's okay, because it would be the right-size
20 boogeymen, right, the deep state actors, the bad guys.

21 But red team was basically how I was communicating all of the information I was
22 getting on the ground to that group. So it's a bunch of formers.

23 Q When the groups were, I guess, providing security at the November 14th
24 rally in D.C., do you recall any of the security individuals wearing pins or markers to
25 identify themselves as security?

1 A Not pins or markers. I mean, like patches and stuff like that, but not really
2 that said "security" on them, just paying attention to -- because everybody had like their
3 plate carriers and stuff like that, except for the formal security. They were like dressed
4 up more so, right? Like the 1AP guys were a little bit different than what the rest of
5 them were.

6 Q Okay. And how so?

7 A They just were dressed like nicer, you know, like just more official looking.
8 I don't know. I vaguely remember like maybe one with like a nicer jacket, like a
9 blazery-type thing, and another with like a lot of like poloier-type shirts. So that became
10 kind of like the distinction on who was what security later for me like in looking.

11 Q And when you mentioned that you went from your group in the box, went
12 from Freedom Plaza to the Supreme Court at this rally, was it always the plan to have,
13 like, a second event or a related event at the Supreme Court?

14 A I don't know.

15 Q Okay. You just kind of followed the group?

16 A [Nonverbal response.]

17 Q Okay. That's a positive response from the witness.

18 A I have no earthly idea any of this stuff other than I was just invited.

19 Q Fair enough, Ms. SoRelle.

20 Do you recall -- I know you mentioned individuals that were in the box being
21 provided security for, but do you recall the Oath Keepers providing security for Mr.
22 Charlie Kirk at this rally?

23 A No.

24 Q Do you recall a situation where the Oath Keepers provided security for
25 Mr. Kirk at all?

1 A Not that I am aware of, no.

2 Q And do you recall the Oath Keepers providing security for Mr. Tyler Bowyer,
3 B-o-w-y-e-r?

4 A No.

5 Q Going back to the box, was it, like, discussed between Proud Boys and Oath
6 Keepers that the Proud Boys would be on the outer perimeter of the box versus Oath
7 Keepers?

8 A So that's what I was saying, that's why I was kind of explaining at the
9 beginning that they got kind of sabotaged in Virginia, right? I don't know what
10 happened with the old guys in Virginia.

11 But that's where Stewart and all of them started fighting, because at one point I
12 remember Whip or Whipit, one of the guys was like, Stewart's sitting on the side of the
13 road waiting on the rest of the guys in Virginia, and they were like, we were already
14 walking at that point, right?

15 So there was like a pocket of us that were supposed to be with Stewart and all of
16 them, and they were going to do their thing, like, with the girls from the
17 freedom -- medical freedom group, right?

18 And what ended up happening is we get there and there's no Oath Keepers except
19 for, like, a random handful, and then me and then these other two, right? And so
20 basically we just merge into their box because the girls --

21 Q You all had a lack of manning it sounds like. The Oath Keepers had a lack of
22 manning.

23 A Yeah. There was just nobody there. And then John Shirley was calling
24 up -- no offense, but he was, like, he was -- he had idol worship with Alex Jones going on.
25 So he was over there kissing his butt. And so then it was just like we were like, okay, I

1 guess we're going with this group. And so it was just like, all right, let's go. Like
2 whatever.

3 Q How long did you end up staying up in Washington, D.C., for this trip? We
4 know you go to Atlanta shortly thereafter. But how long did you stay in D.C.?

5 A I think we leave the next day.

6 Q Okay.

7 A And we had a few days to, like, burn somewhere in there. And I think we
8 end up in Tennessee for a couple of days. I'm trying to remember when that
9 Tennessee -- yeah, it had to have been in November.

10 So, yeah, so I end up in Tennessee because we're really just trying to burn time,
11 you know.

12 Q Before the Atlanta rally?

13 A Right. Because they talked about going to the Atlanta rally. And they
14 have the falling out. So where we were going to go back to North Carolina, we're not
15 going back to North Carolina now, right?

16 So then the guys -- and it's just literally Whip, Whipit, me, and Stewart, and I'm
17 still on the phone nonstop with all the different groups and all the witnesses and stuff.

18 And so I'm like I just need a base for a couple of days, and then we can like -- I
19 mean, we can either get to Atlanta or we can drive and we can stop and then go from
20 there.

21 So we end up in Tennessee, which was actually pretty cool because I'd never been
22 to the Smoky Mountains. So I end up getting to see that.

23 Q It's a beautiful place to see, yeah, and especially it's close to north Georgia,
24 so you can get to Atlanta quickly is what I'm assuming.

25 Is that why you all -- where did you all stay in Tennessee? Who did you stay

1 with?

2 A No, we stayed at -- I don't know the place -- I paid for it -- in Gatlinburg. Is
3 it Gatlinburg? I don't know. Whatever that town is.

4 Q So you just rented a home in Tennessee to stay to burn time?

5 A It was like an apartment kind of thing, but it was like a hotel. So it was
6 just -- it had, like, multiple bedrooms. It had like two bathrooms, kitchen. But it was in
7 like -- I can't remember the hell the name of it. Shit.

8 Q No. It's fine. It's okay.

9 Going back to D.C. in November, just want to make sure we button this up. Did
10 the Oath Keepers have any communications with any Congressmen while in D.C. for that
11 rally that you're aware of?

12 A Not that I'm aware of.

13 Q And do you recall Mr. Rhodes or any other Oath Keepers having the
14 communications with the White House while in D.C. for November 14th?

15 A No, not that I'm aware of.

16 Q So you stay in Tennessee for a couple days, and it sounds like you head next
17 to the rally in Atlanta around November 18th. Is that accurate?

18 A Yes.

19 Q Okay. So we saw in the Friends of Stone chat on November 14th, there
20 was a video from Mr. Stone about the rally in Atlanta on November 18th.

21 Do you recall this video or seeing this video?

22 A No. I really, honestly, I was more occupied with trying to figure out what
23 the hell was going on with the election side of it than the rally stuff. So, like, the rally
24 stuff, it's just like point and shoot.

25 So I was invited to all of it, so I was just -- I mean, in hindsight I'm like, why did I go

1 to this crap now? But like at the time I was being invited by people, right, so I was
2 like -- like Marsha Lessard, and, you know, just whatever.

3 Q So let me understand Ms. Lessard's part because I'm a little confused.

4 Is she considered one of the organizers of all these rallies with Mr. Alexander and
5 Mr. Jones?

6 A So what it actually looks like is that you've got those rally series groups with
7 the organizers that Ali -- and I think generally there's a 1AP guy in there -- are basically
8 saying, here's our next stop. And they add everybody in. And they're like, anybody
9 want to be there?

10 Q Okay. So Mr. Alexander is almost like saying -- let's use Atlanta
11 November 18th as an example. We're going to be in Atlanta November 18th. So, Ms.
12 Lessard, does your group want to have a speaking role or a part in the rally in Atlanta?

13 A That's what that looks like.

1

2 [1:21 p.m.]

3 BY [REDACTED]:

4 Q Okay. And so the point person, then -- if we have to characterize someone
5 as a point person, then, it is Mr. Alexander. Is it anyone else?

6 A It's generally one of the 1AP guys.

7 Q Okay. And who is one of the -- Mr. Enlow, for example? Is that --

8 A That. You've got Enlow, you've got -- or Rob Lewis or Yoda, one of them.

9 Q Got it.

10 A And so it seems like they become, like, the cog in the wheel, and then
11 they're -- you know, like, they're just the ones churning out the stuff, and then they're
12 just sending it out to everybody, saying, hey, do you want to be there?

13 Q Do you believe Mr. Alexander was receiving any directions on where the
14 next stop should be from anyone?

15 A I have no earthly idea where that was planned or orchestrated. None of us
16 do. We have no earthly idea how any of that was coordinated or what the -- no clue.

17 Q So, in the video that I mentioned -- it was in the "Friends of Stone" chat that
18 you produced to us -- Mr. Stone is telling the people in the group to promote the video
19 for the next rally in Atlanta.

20 Do you recall anyone in this group of your friends -- or, not friends -- of colleagues
21 with the Oath Keepers promoting this video?

22 A No. So Stewart had been deplatformed, for the most part, right? So he
23 was off of Twitter, he was off of -- as a matter of fact, that was actually, like, his -- it was
24 this bitch, right? Because he was like, I have no reach anymore, like, I've been
25 deplatformed everywhere, I can't be on Facebook, I can't be on Twitter, I can't be on, you

1 know, anything. All he had was, like, his Oath Keepers site.

2 So I don't recall him actually promoting any of their material, other than just
3 agreeing to be there when they, you know, ask him for security details.

4 Q So you all went to the Atlanta rally, November 18th, correct?

5 A Correct.

6 Q And, at this rally, it was being organized by Stop the Steal and Mr. Ali
7 Alexander, to your understanding?

8 A Yes, it was.

9 Q Do you recall Mr. Roger Stone being at this rally as well?

10 A I did not see Roger Stone. I saw -- like I said, I saw Nick Fuentes, but that
11 was on the streets. I saw the Groyper group down there. And then, at the hotel, I saw
12 Ali and his crew and then 1AP guys.

13 Q Did you see any Proud Boys, like Mr. Tarrío?

14 A Not at the hotel, no.

15 Q Do you recall --

16 A But there were -- but there were -- but there were Proud Boys there, but
17 Enrique was not there. Let me just rephrase that.

18 Q Okay. So you didn't see Mr. Tarrío speak at the rally in November at
19 Atlanta?

20 A I did see him speak.

21 Q Okay.

22 A Oooh. Did I see -- I don't know that I saw -- he was there. I don't know
23 that I saw him speak.

24 Q Okay. So how did you know he was there? Where did you see him?

25 A Right on the risers. Because it was on the steps, right, and then there's,

1 like, a ladder --

2 Q Yeah.

3 A -- and so there was, like, the steps that went across. And so I was, like,
4 here with the Oath Keepers, and then Proud Boys were over here with their little pocket.

5 Q Okay. And what hotel -- you said you saw him at the hotel. Which hotel
6 is this?

7 A It was one that was downtown -- are you talking about where we met up?

8 Q Yes.

9 A I have no earthly idea where that was at.

10 Q Where was it? You don't -- was it downtown Atlanta, though?

11 A It was downtown Atlanta. I mean, we were downtown.

12 Q Okay.

13 Do you recall Mr. Alexander or Mr. Jones going into the capitol at this rally?

14 A I was not there during that timeframe.

15 Q Do you recall it, though, like, them going in? Even afterwards, did you ever
16 hear about this?

17 A I did hear about it, but it was after the 6th.

18 Q Oh, after January 6th, you heard about Mr. Alexander and Mr. Jones going in
19 the Atlanta capitol?

20 A I think Stewart, after the 6th, says he remembers them doing something to
21 that effect. But it never registered in my mind that they had gone into that -- into the
22 capitol in Georgia.

23 Q When you heard about this after the 6th, what was your reaction to hearing
24 that?

25 A I was already -- like, it was just like, there was a bunch of stuff, that it's

1 like -- you know, we're watching, like, kind of, the demonization of Stewart, and I'm like,
2 what about these guys?

3 Like, it's -- and Alex Jones doesn't really get hit. And you never see -- you know,
4 like, Owen got his, whatever -- Owen Shroyer or whatever the hell his name is. But we
5 don't really see the attack on Ali. We don't really see the attack on the ones -- and
6 we're like, well, wait a minute. This is, like -- this must be that new math stuff where
7 it's, like, 1 plus 8 equals 4. You know?

8 You're like, there's something -- something wrong here. Because it was very
9 clear, after the fact, looking -- we were like, well, wait a minute, why are we, like, all being
10 targeted when all we were doing was following them, literally following them?

11 Q So help us understand that. And I know we're jumping ahead now to
12 January 6th, and we'll hit January 6th fully later. But what do you mean, all you were
13 doing was following Mr. Alex Jones and Mr. Ali Alexander?

14 A Well, because they were the ones that were like, we need security for this,
15 we need -- you know, we need you to have security details for Ali, we need -- so, literally,
16 what they were doing was basically just putting the Oath Keepers with them, right, to
17 follow them.

18 Q Right.

19 A Do you see what I'm saying?

20 Q So -- yeah, but what was their role, then, if you're -- if you know anything?
21 I guess, why should Mr. Jones or Mr. Alexander be responsible for January 6th? I guess
22 that's what we're trying to understand.

23 A Well, that's where you have to look at it from the bigger picture, and things
24 don't really make sense at the surface. It's just, after the 6th, we start going, what went
25 wrong? Right? And you start kind of looking around, and you're kind of like, okay, this

1 doesn't make sense.

2 So then I just kept on that. Like, I just kept -- people starting calling me that
3 weren't even associated with the org. And, you know, I mean, what everybody was
4 doing was following them. You see what I'm saying?

5 Q Did you ever recall them, as in Mr. Jones and Mr. Alexander, promoting what
6 ended up happening on January 6th?

7 A So that's really funny because -- I come out of Texas -- and I can take you
8 down a weird one.

9 So the person that I hear about with Hammer and Scorecard, that I listened to the
10 interrogation of by Michael Zullo, it was him discussing how they honeypotted Lieutenant
11 Colonel Allen West in Florida, okay, and that he's working for the DOJ. All right.

12 Fast-forward, guess who shows up in Texas and is part of our anti-lockdown rally?
13 Not that I don't like Lieutenant Colonel Allen West; it's just very weird, okay? This is all
14 I'm suggesting.

15 Allen West shows up, and he starts promoting "We are the storm," right? I have
16 a Republican T-shirt in Texas that says, "We are the storm," right? And he's part of
17 every anti-lockdown thing we're doing.

18 So this "We are the storm" thing was embedded in us, especially those of us in
19 Texas, like, in the summer of 2020.

20 And I'm not saying anybody's bad. I'm just saying, this is -- and we're doing
21 capitol rallies, and we're on the steps in Texas. Right?

22 Q Yes.

23 A So we're not looking at this -- none of this rhetoric that everybody likes to
24 throw up in everybody's face is anything really outside of what -- so when I'm hearing
25 people saying, like, "We're the storm," "wild rallies" -- well, yeah, we've just had a year of

1 them. Like, what else do you want? You know?

2 And we've been pushing anti-lockdown shit. And we've been successful. Not
3 that I'm saying we're going to go overthrow our government, okay?

4 Q Right.

5 A There's a difference between your First Amendment and your
6 constitutionally protected rights.

7 So all of these narratives, in hindsight, when you're looking back, I'm like, what the
8 hell is everybody bitching about?

9 Where we got screwed is, I don't know who brought in some of the people that
10 were brought in. I was never part of the violent side of this. I never saw the violent
11 side of it. And the Oath Keepers that did get drug through that were literally drug
12 through it.

13 Q Right. Okay.

14 Going back to Georgia -- and thank you for that explanation.

15 Going back to Georgia, did you all also attend a demonstration at the Governor's
16 mansion while you were there?

17 A Yes. Yes, we did.

18 Q Who organized -- was it Mr. Alexander organized the demonstration at the
19 Governor's mansion as well?

20 A Yes, he did. So, when we got done with the rally on the steps at the
21 capitol -- and so that's what ends up being, by the way, the battle with Nick Fuentes --

22 Q Okay.

23 A -- is, after that, everybody goes to eat. Everybody's going to eat in this little
24 district in Atlanta that's really cute. I don't know what the name of it is, but it's a bunch
25 of little restaurants and they're, like, cute little bars and stuff like that. So we go eat

1 down there, and then that's where we have the confrontation with Nick Fuentes.

2 Then, after everybody's eating, they're supposed to be meeting up -- I'm just
3 throwing out a number -- at, like, 7:30 or something at the Georgia Governor's mansion.

4 Q Okay.

5 A So this is the plan. You're going to leave the rally, you're going to go grab
6 some food, this is where everybody's going, and then fast-forward, we're going to go
7 after that to the Governor's mansion.

8 So everybody was just trying to stay in pockets. That's where I was actually
9 spending some time meeting with some attorneys that were working in Georgia that
10 were having the same issue with Sidney Powell.

11 Q Understand. Got it. Okay.

12 Were the Proud Boys at the rally at the mansion as well?

13 A Yes.

14 Q Do you recall seeing Mr. Stone at the mansion rally?

15 A No, I do not.

16 Q What was the purpose, just big picture, of going to protest at the Governor's
17 mansion?

18 A I have no earthly idea.

19 Q No worries.

20 A I'm telling you, I'm like the fly on the wall, okay?

21 Q Please, only answer what you can recall and what you know. Yeah.

22 Please, don't -- only if you know. We just have to ask the questions. I know you know
23 this from your practice as well. We just have to ask the questions.

24 So that takes us to December 5th in Dallas. Do you recall any other rallies or
25 protests between this November 18th through 20th one in Atlanta and then Dallas, Texas,

1 on December 5th?

2 A No. After Atlanta, drive back to Texas -- yeah, drive back to Texas. I end
3 up actually stopping because I have a trial. So it's a drive, and then we don't -- like,
4 because it's Stewart and I going back. Because, at that point, everybody's going back to
5 their home States, right?

6 Q Right.

7 A And so I end up with Stewart driving back. We get to Louisiana -- well,
8 Mississippi, Louisiana. And I have a Zoom trial, so I end up spending the night in New
9 Orleans, because I need a place to stop to do a Zoom trial.

10 Q Okay.

11 A And so I have a case that lasts all day. And so we end up actually staying
12 another night in New Orleans, because I don't even get done until after 6:00, basically. I
13 think it was, like, 5:00 or 6:00. So it, like, started at 9:00 and it went all day.

14 And so the plan was for me to do my hearing and then hit the road and get home,
15 but it ends up being -- so Stewart and I are just like, all right, well, I guess we're just
16 New Orleans'ing it for a bit. But that was because it was like -- we were kind of like,
17 where do we want to go? Because I've got to stop and do this. I was like, well, hell,
18 I'm going to New Orleans -- although I was really disappointed. No bars were open.

19 But I end up stuck in -- yeah. So I end up spending some time in New Orleans
20 and then head on in to Texas. And then Stewart goes back up to wherever he's at.
21 And then I go home, and it's Thanksgiving and all of that.

22 Q Okay.

23 A I think that's about right.

24 Q No, that's -- that seems fair.

25 So the next rally we see in the production you gave us is the December 5th rally in

1 Dallas.

2 A Right.

3 Q Do you recall this rally?

4 A I do.

5 Q Was this another Stop the Steal rally?

6 A Yes, it was. And it was orchestrated by Alex Jones and Owen Shroyer and
7 all of them.

8 Q Right. And so that explains why we see Mr. Enlow coordinating with you
9 and Mr. Rhodes in the chat?

10 A Yes.

11 Q What role do the Oath Keepers play at this rally, personal security detail or
12 event security?

13 A Event security. And then Stewart spoke at that one.

14 Q Okay. Who, I guess, organized the speakers? Was it Mr. Jones?

15 A Yes. Well -- yeah, because Ali wasn't there, I don't think. Was Ali there?
16 I don't remember Ali. I remember all of Alex Jones's group there. I don't remember Ali
17 being there. But it was basically, they were coordinating with us to attend.

18 Q Did Mr. Stone speak at this rally as well?

19 A No, not that I recall.

20 Q Okay.

21 A But, see, so you know, Stewart is notoriously late to everything he does.

22 Q That's not very military-like.

23 A I know, right? And I have to laugh because I can't say -- I told you, I was,
24 like, along for the ride. I can't say that, like, anything -- like, I get there, I see who's
25 there. We're there for a little bit. We have some other friends -- ooh. Oh, shoot.

1 This makes so much sense.

2 So there's a guy named Brian (ph) and Christin who are part of the Texas Freedom
3 Coalition, but Brian (ph) is very associated with the Dallas GOP. So is Sidney Powell.
4 And he's really good friends with Sidney Powell's son. And so that becomes another
5 interesting thing, because Brian (ph) is also making sure we're at these events too.

6 Q Brian -- what was the last name again?

7 A Brian -- agghh.

8 Actually, he's not in here.

9 Because this was another one that was -- that I was kind of, like, later going, like,
10 "oh my gosh" when I realized Dallas GOP was so dirty in all of this.

11 And so, also, just so you know, I should tell you this. Stewart -- ooh. Okay, so
12 this is where -- you can think we're nuts or think I'm nuts, but Dallas GOP ends up being
13 someone who I end up realizing has a lot of ties to Abbott, and I'm not really a fan. So I
14 would say that would be, like, the Texas establishment faction of the Republican Party in
15 Texas, okay? I am not a fan of the Dallas GOP. I love some of the other factions. But
16 they would be what we would all consider to be, like, our opposites, right?

17 So, when we were doing the anti-lockdown stuff, they started sending in
18 friends -- "friends" -- to Stewart out of the Dallas GOP. Everybody comes out of the
19 Dallas GOP that basically ends up directing me, Stewart, and a bunch of people.

20 So in a weird way, it's like, okay, this is cool. But it's just like, for me, in hindsight,
21 when I look back, everything came out of the Dallas GOP. Does that make sense to you?

22 Q Yes. Yes, it does.

23 A So it's like Russ Ramsland, Keith Louis, ASOG, Sidney Powell, Lieutenant
24 Colonel Allen West -- which, I like Allen West -- Glenn Beck, I mean -- shoot -- True Texas
25 Project. Like, all of it circles back to Dallas GOP.

1 I want to, like, go crawl in a hole.

2 Q So, going back to the rally, were the Proud Boys at this rally in Dallas on
3 December 5th?

4 A No, they were not.

5 Q They were not. So this was an Oath Keeper/1AP rally?

6 A And Texas State Militia.

7 Q And Texas State Militia. Who was in control of the Texas State Militia?

8 A Nobody.

9 Q How did the Texas State Militia get pulled into this event?

10 A Because we're friends with them because of the anti-lockdown stuff.

11 Q So you met the Texas State Militia during the anti-lockdown protests in
12 Texas and built a relationship there?

13 A Yes.

14 [REDACTED]. [REDACTED]?

15 BY [REDACTED]:

16 Q I wanted to ask if there was another group present there, the Southern
17 Patriot Council. Does that ring a bell?

18 A Not that I'm aware of.

19 Q Does the name Eric Braden sound familiar?

20 A No, it doesn't.

21 Q Okay.

22 And did you say earlier that the Groyper were also there on December 5th in
23 Dallas?

24 A No. The Groyper --

25 [Video interruption.]

1 A This is why I was explaining Stewart runs really late to everything.

2 Q Oh, I'm sorry, Ms. SoRelle. I think we lost you for just 10 seconds there.
3 Do you mind starting over?

4 A I was just saying, like, Stewart runs late to everything. So, like, say the rally
5 started at 10 a.m., okay? Stewart's getting there at, like, 3:30 in the afternoon. Does
6 that make sense to you?

7 Q Yeah.

8 A So I can't tell you what happened beforehand. Stewart's more concerned
9 about getting there -- like, his guys are there. Like, he had guys there from his org.
10 But, no, I mean, like, Stewart runs late to everything.

11 Like, I was literally like, dude, we were supposed to be there at, like -- because
12 he's like, I'll come get you, just stay there, I'll come get you. And I was like, okay, fine,
13 whatever. And then it's like -- I'm like, dude, we're already supposed to be there, you've
14 not even left, and you're, like, an hour away. Like, what are we doing? I was like, I'll
15 drive, I'll drive myself over there.

16 So I don't know what all happened at that rally. So that's the whole point. Like,
17 there was no organization of this crap.

18 Q Understood. Thanks.

19 I'll turn it back to [REDACTED].

20 [REDACTED]. Ms. SoRelle, I believe this is a good break where we can take 20
21 minutes, come back at, like, 2 o'clock eastern time, 1 o'clock your time, I believe.

22 The Witness. Sounds good.

23 [REDACTED]. And then, just so you have a roadmap of where we're heading
24 when you come back, we'll hit the 12th, the rallies on the 12th, and then we'll start
25 discussing the lead-up and January 6th when we come back.

1 The Witness. All right. Awesome.

2 ██████████. All right.

3 We'll go off the record at 1:41 p.m. eastern time. Thanks.

4 [Recess.]

5 ██████████. All right. We will go back on the record at 2:00 p.m. eastern
6 time.

7 BY ██████████:

8 Q Before we jump to December 12th, Ms. SoRelle, did you recall the Patriot
9 Boys of North Texas working any events with the Oath Keepers?

10 A That's not a name that I recognize. Although I -- I mean, coming around
11 and trying to get Texas audits going, I think I may have met with, when I met with Seth
12 Keshel, with a couple of them.

13 Q Okay. So you recall the group, but you don't recall necessarily working with
14 them or seeing them at events?

15 A No.

16 Q Okay. Who do you recall seeing from the group, if you remember any
17 names?

18 A It was a guy -- sorry.

19 Q No, that's fine.

20 A I know Aubrey was associated with them, Aubrey and -- I'm trying to see if I
21 can find his name. I don't remember his name.

22 But would that be, like, the -- is that, like, the north Texas, like, version of, like, the
23 Proud Boys chapter kind of thing, you know?

24 Q I believe so.

25 A Okay. They were -- so they had been ostracized from that group, so it

1 wasn't them. So they had been in the north Texas, like, Proud Boys group, and then
2 they had broken off that from, like, because they had been -- they just didn't get along
3 with them.

4 Q Okay.

5 Does that prompt any followup from any other staff?

6 [REDACTED]. So, just following up on that real quick, I actually think it's a
7 separate group that's a militia called Patriot Boys of North Texas. Does that ring any
8 bells?

9 The Witness. No, it doesn't.

10 [REDACTED]. Okay. No worries.

11 [REDACTED].?

12 [REDACTED]. Thanks, [REDACTED].

13 BY [REDACTED]:

14 Q Okay. So, for December 12th, do you recall the rally on December 12th in
15 Washington, D.C.?

16 A Yes.

17 Q So you all, it sounds like the Oath Keepers, Mr. Rhodes, you, you came back
18 to D.C. for this rally?

19 A I actually took my kids to D.C. for that rally.

20 Q Okay. I guess, when did you arrive in D.C., if you remember? The rally
21 was on December 12th, so did you get in on December 11th?

22 A I want to say we got there the day before, because I took my kids and we did
23 touristy stuff for a period of time in there.

24 Q Okay.

25 A Like, that one was -- sorry, go ahead.

1 Q Oh, no, no, no. Keep going.

2 A No, I was just going to say, I wasn't really with the group. I knew they were
3 there. And we did go to the Jericho March portion of it.

4 And I did record Stewart for Stewart, because Stewart said, could you record this
5 for me, because we were with General Flynn? And I did see them with General Flynn.
6 Whip was there. I mean, like, the usual crowd was there, right?

7 Q Right.

8 A But I didn't -- I mean, I really did, like, more mom stuff on the December
9 12th rally.

10 Q Okay. That makes sense then. Your text messages seem like you were
11 geographically separated from Mr. Rhodes during this rally. So you were with your
12 family?

13 A Uh-huh. And he just wanted me to -- like, basically, it was just, like, make
14 sure, you know, you guys are okay and just check in kind of thing, whatever, but we're
15 here, we're doing the rally stuff.

16 And so we didn't follow any of their stuff. We just went over -- when they were
17 going to bring General Flynn over to the Jericho stage, he was like, can you just come get
18 some photos and videos and stuff like that for me? And I was like, that's fine.

19 And so we went over there, my kids listened to that portion of it, and then we
20 went on and did more touristy -- I mean, like, we just kind of roamed around. We did
21 other stuff.

22 Q And so you mentioned that Mr. Rhodes was with General Flynn during this
23 rally?

24 A That was the one where General Flynn and 1AP and Ali Alexander and all of
25 them had asked him to aid with security for General Flynn.

1 Q Okay. So can you explain that again? So who helped to aid with security
2 for General Flynn for this rally?

3 A The Oath Keepers. So Stewart, Whip -- but he brought Whip in. And then
4 it was just the other Oath Keeper guys that had showed up.

5 And I really, honestly, on that one, I was not enough associated with them to tell
6 you who was where and what. I saw them with General Flynn. I saw Whip with
7 General Flynn. I saw them all walking to put him in a car and all of that stuff. But, I
8 mean, there was no -- like, I'm not -- I'm not, like, the best one for the December 12th
9 rally.

10 Q No, I understand. But who brought the Oath Keepers in for protecting
11 General Flynn?

12 A It was the same -- it was the same group. It was the Stop the Steal series, it
13 was the same messaging, it was the same kind of thing. Because he contacted me and
14 said, I'm going to go back to D.C. for the December 12th.

15 And it was also, like, in my FOS, right? Like, that "Friends of Stone" stuff. So,
16 like, you saw it. And he -- somewhere in there, Stewart's -- I don't know if we call -- I
17 guess maybe he called me. I don't know. But I was like, yeah, I'm going. Like, that's
18 fine, it's whatever. I was like, I think I'm going to take my kids this round though.

19 Q Okay.

20 A And so I took the kids to D.C., and we did different stuff than what the group
21 was doing.

22 Q So you all, from what you can remember, went to the Jericho March and not
23 necessarily the rally at Freedom Plaza? Or did you go to both?

24 A I didn't do any of that stuff. I just did -- Stewart said he was speaking at
25 Jericho March, and he wanted to know if I could come over. And I said, tell me what

1 timeframe that is. And I don't -- you know? Because I was like, that's fine, the kids can
2 go listen to some of that stuff. I mean, you know, I wanted them to see -- experience
3 this stuff. Does that make sense?

4 Q That makes sense. Yes.

5 A So I wanted them to see portions of it, but I knew my kids, even though
6 they're all teenagers, would not want to sit around a rally all day. So they got the
7 experience of it. We sat there through Stewart's and Oath Keepers, and we listened to
8 several speakers actually.

9 And then I recorded his stuff. I saw them leave, whatever. And then that was
10 pretty much, like, the end of that for them too. Like, I mean -- like, I didn't have
11 anything, really, to do with them during that one.

12 Q So who is Mr. Rob Weaver? We saw a message where Mr. Rob Weaver
13 asked Mr. Rhodes for contact information for Senator Kennedy. Do you recall that?

14 A Rob Weaver. The name is very familiar, but it's not popping into my head.

15 Q Okay.

16 A But I don't think Stewart had contact information, or if he did, he went
17 through, like, Marsha Lessard or something like that.

18 Q How would Ms. Lessard have contact information? Did she --

19 A I don't --

20 Q Was she connected to congressional Members?

21 A No. But, see, I now have contact information after that because I joined
22 the medical Google group. So now I have contact information for him, but it was only
23 not until, like, the spring.

24 Q No worries. So you don't recall Mr. Rob Weaver's coordination with
25 Mr. Rhodes at all for the December rally?

1 A No.

2 Q Okay.

3 Do you know where the Oath Keepers stayed for this rally?

4 A Everybody was back out at the hotel at Tyson's Corner. And I went back
5 out there -- I stayed there too, just because I knew -- I had gotten familiar with that area.
6 Like, I was comfortable with it.

7 Q The Hilton Garden Inn in Vienna, Virginia?

8 A Yeah. And then so we did the mall and all of that stuff.

9 Q Do you know of anybody else that the Oath Keepers provided personal
10 security for during this rally other than General Flynn?

11 A I really have no -- he was -- I know Stewart and all of them were really
12 excited about doing General Flynn's security detail. So I don't know -- I really just didn't
13 get involved in that one.

14 Q I understand. I have to ask the questions, and if you don't know, that's
15 fine; it's fair to say.

16 Do you recall seeing Proud Boys at the December 12th rally?

17 A Yes, I do. Yes, I do. They were with --

18 Q Did it appear to be more Proud Boys at this rally than the November rally?

19 A Yes. And there was a bunch of them, and they were with Alex Jones's
20 group. Because they came up on the other side during the Jericho March.

21 And so the Jericho March was doing, like, their staged event, you know, like,
22 because they had a stage. And then the Proud Boys and Alex Jones came through, like,
23 bullhorning and were really loud and obnoxious.

24 Q Did you see Mr. Roger Stone, as well, at these events?

25 A Not at that one, no.

1 Q Okay. You don't recall -- I think we've seen video of Mr. Stone and
2 Mr. Tarrío talking from a balcony in D.C. on the night of December 11th. Do you recall
3 that?

4 A I mean, I've seen that stuff. I have seen -- I know he's there. He's just -- I
5 don't see ever Roger Stone actually out in the venues.

6 Q That's fair. But you do see Mr. Alex Jones with Proud Boys at the Jericho
7 March on December 12th, though.

8 A Yes. Yes. Because, actually, my kids were like, what's wrong with them?
9 They're disrupting, like, the stuff going on over here. And I was like, I have no earthly
10 idea. Like, I was like, that's a whole different world.

11 Q Was the environment -- did it feel different with the Proud Boys compared
12 to the November rally in December? Was there a difference in, like, the atmosphere?

13 A So, like I said, it was basically -- what we were watching on the Jericho stage
14 was just different -- and there was politicians there. I mean, like, there was, like, I think
15 Blackburn. I think I heard her speak. And --

16 Q Who was that you just said? Who?

17 A Blackburn.

18 Q Oh, Blackburn, Senator Blackburn. Got it.

19 A Yes.

20 Q Okay.

21 A And so, like, I saw, a bunch of, like -- they were, like -- I think some of them
22 were, like, Zoomed in or whatever. Like, they were remote. I'm trying to remember
23 who was actually there.

24 But I listened to a lot of speakers. And it was just, you know, kind of like the
25 Christian, conservative speakers. We listened to a lot of that, some music.

1 But then, like, literally during that, Alex Jones's group, like -- because we're
2 standing there; everything's peaceful. And then they come marching up from the
3 other end of The Mall, so not towards the Capitol, but from the other side, like, from the
4 Washington Monument side. And they come marching up. And they're just, like,
5 bullhorning and being really loud. And it's a giant, massive group of Proud Boys with
6 Alex Jones and all of them with a bullhorn.

7 Q Okay.

8 Did you go to the -- it sounds like -- did you go to the Supreme Court part of this
9 rally, as well, on December 12th?

10 A So my kids saw all of that, but we were not associated with any of the rally
11 stuff. I was just walking them around showing them D.C.

12 Q And I'm assuming because you were with your kids, you didn't hang around
13 late to see any of the fighting or violence with the Proud Boys that night on December
14 12th?

15 A I heard about all of it. I heard about -- like, is that the stabbing one and all
16 of that stuff at the bar?

17 Q Correct.

18 A I heard about all of it. And it was going on, like, in -- like, one of the -- I
19 don't know if somebody was texting me or if it was -- I think I was getting texts, like,
20 actual text messages about it from -- ooh, from Bianca and them.

21 Q Okay.

22 A Like, they were all kind of sending me messages, because, actually, that's
23 where I found out that about.

24 And I had found out from Bianca, too -- so Bianca, unfortunately, and I text -- text
25 message. Like, a lot of our communication was just, like, regular phone communication,

1 so I don't have any of it.

2 Q Okay.

3 A But I do know that, like, that was the sequence of communication, is she was
4 telling me that they had been attacked by antifa and that Proud Boys had been attacked
5 by antifa, and it was -- I can't remember the name of the bar, but it's the Republican bar,
6 apparently.

7 Q Harry's? Was it Harry's?

8 A Harry's, yes. Yes, that's exactly what it was.

9 Q And was this -- I guess, going back to your answer earlier, this was when you
10 met Ms. Gracia, really? At the December rally?

11 A No. I don't meet her until the January 6th rally.

12 Q Okay. So you guys are just texting, but it's almost like a text friendship
13 rather than in person.

14 A Yeah. I had not physically met her until later.

15 Q Okay.

16 A I had talked to her a thousand times and all of that, but I had never, like,
17 physically interacted with her.

18 Q Okay.

19 It appears my colleague [REDACTED] might have some followup for you regarding the
20 Jericho rallies.

21 [REDACTED]. Yes. Thank you, [REDACTED].

22 BY [REDACTED]:

23 Q And, Ms. SoRelle, I know you were not involved in, sort of, the operational
24 side of the Jericho March, but I have a couple of followup questions. And if you don't
25 know, it's completely fine.

1 So Mr. Weaver, Robert Weaver, who ██████████ mentioned before, was one of
2 the organizers and co-founders of the Jericho March. Do you ever remember
3 interacting with him in that capacity?

4 A No. I didn't interact -- I didn't go into, like -- because there was, like, a
5 whole section back to the back. Stewart had invited me back there to meet all of them.

6 Q Uh-huh.

7 A I declined to, actually, because I was with my kids, and I was just like, look,
8 we're just going to hang out out here. You know, like, I don't have any desire to get into
9 that mess.

10 Q What about a woman named Arina Grossu? She was the other organizer of
11 the Jericho March.

12 A I have no interaction with any of them.

13 Q Okay. Did you ever speak to Stewart about the nature of his interactions
14 with either Mr. Weaver or Ms. Grossu?

15 A No, I didn't.

16 Q No? And did you ever know about Oath Keepers providing security to
17 Mr. Weaver or Ms. Grossu on that day or any other day?

18 A I know that they had security in -- I know they were with Flynn. And I know
19 they were down underneath the Jericho stage, because I saw them down there.

20 So, like, Stewart says, hey, come here. And I was like -- he, like, calls and is like,
21 come over here. And I was like, okay. And so I told my kids, I was like, stay there.
22 They're all teenagers.

23 And I go over there, and there was, like, a bunch of the Oath Keeper guys, like, up
24 in there, but --

25 Q Uh-huh.

1 A And they were working the event. But they weren't -- like, I don't know
2 who they were specifically doing security for or any of that stuff.

3 Q But it was your understanding, or at least your impression, that they were
4 helping to orchestrate the event?

5 A I don't know that they were orchestrating the event. I think they were just
6 assisting with the event.

7 Q Assisting the event. Okay.

8 A And did you ever know about Mr. Weaver being included in any Oath Keeper chats
9 that you were aware of?

10 A I mean, he really very well could've, but I don't recall him. I mean, that's
11 just --

12 Q That's helpful. Just wanted to double-check on our end.

13 A In terms of the Jericho March itself, do you remember what Stewart was saying
14 during his speech?

15 A Probably general Stewart stuff, like -- I mean, I don't remember anything,
16 like, off the top that was, like, over the top.

17 Q Well, I'm actually curious, given our conversation earlier, if you could shed
18 some light on some of what he was saying? Because during --

19 A Stewart --

20 Q -- during that speech, he called on President Trump to invoke the
21 Insurrection Act and call up the Oath Keepers as militia in order to avoid a more
22 desperate conflict.

23 A So with that kind of -- what do you make of that, in light of what we were saying
24 earlier?

25 A So Stewart is a major history buff, okay? You guys, you have to take his

1 stuff into context. And everybody likes to hear keywords of what Stewart's saying
2 without taking it in a larger context of who Stewart is or --

3 Q Uh-huh.

4 A -- understand where he comes from.

5 But Stewart was absolutely convinced that -- and he's absolutely right, because
6 that's absolutely what was true -- was that we were facing some form of military event in
7 this country. And he was not nailing it correctly, with the color revolution aspect of it.
8 I think he was too stuck in the history. And I wish we -- actually, I wish I had had more
9 knowledge at the time, but that's just not what we were looking at.

10 And so what he was looking at is the way the narratives were being formed. And
11 he was very history-oriented. And he can tell you pretty much what happened in the
12 Spanish Civil War, if you want to sit and listen to him for hours. And he was convinced
13 we were heading into, like, a military-type occupation.

14 And he was afraid of that, because it's a fascistic-type system, right? It's not
15 something that you want to see, is a military occupation of your country. And so
16 Stewart was absolutely convinced that he thought that all of these players were being
17 moved in.

18 Now, I don't know, Stewart could absolutely be best buds with General Flynn on
19 the side and knew exactly what was going on. I have no earthly idea. I really don't.
20 But he was just convinced that we were facing this type of situation, just based off of stuff
21 that we were looking through over the summer -- and, actually, before the summer,
22 during the spring. Because we were looking at it from the standpoint of, if you're going
23 to change the structure of our government, how are you doing it? And then he started
24 trying to put pieces together.

25 Now, for everybody else, that's inflammatory. I get it. But that's what he's

1 saying, is we are in the middle of a war, y'all just don't realize it yet. It's a cold civil war,
2 or a color revolution, which is informational, right? Like, it's the informational psy ops
3 aspect of it. And that's what he was -- he just was missing the mark on how he was
4 saying it, because he was focused on the wrong war.

5 Q Right. Right.

6 A He should've looked at Venezuela's playbook instead of, like, the Spanish
7 Civil War.

8 Q Uh-huh. So you wouldn't be surprised, then, that he used that speech to
9 say that the Oath Keepers should be called up as a militia?

10 A So "militia" gets a really bad connotation, but it's the civil defense.

11 Q Uh-huh.

12 A I mean, we can call it "armed forces." I mean, you can go into a lot of
13 arguments on that, and that's something, you know, everybody's got an opinion on.
14 And there's a lot of Texans around here that think that militias are intended to protect
15 your immediate surroundings, right?

16 So, I mean, we can get into semantics, but that's what he was saying, is, if things
17 go bad -- here's what my understanding of his intent was. It was always: If things get
18 bad while we're here, we're here, right, in a defensive posture, not an offensive posture.

19 Q Right. So --

20 A Like it or not, agree with it or not --

21 Q Right.

22 A -- that's what he was trying to say.

23 Q So, on December 12th, where did you view that posture?

24 Like, we talked a lot about people who were trying to mislead the public earlier in
25 the post-election period. But then you have a lot of folks you've spoken about at these

1 events on December 12th, and did you think that they were all on board with the, sort of,
2 quest to get to the truth? Is that what the Jericho March represented to you?

3 A So I think it was going more along the biblical timeline of probably getting
4 more, like, apocalyptic, I think?

5 Q Hmm. Okay.

6 A Which I didn't necessarily agree with. I have concerns with a lot of the stuff
7 that's going on, but I don't necessarily think we're living through Revelations. I don't
8 know, we could be.

9 But it just seems like that was, from Jericho March, I saw it more of, like, a
10 biblical-type aspect, that we are in a battle of good and evil. And, you know, I don't
11 necessarily, like, subscribe to that rhetoric either.

12 Q Uh-huh.

13 A But that was a lot of what I was hearing.

14 And do I think that they absolutely wanted a physical conflict in this country?

15 Yes, I do. I don't think they got it. And they may still try to pull it. But --

16 Q Who do you mean?

17 A I think Flynn's crazy.

18 Q Ah.

19 A Like, I really do. Like, he is -- his wording is worse than Stewart's.

20 Because at least Stewart is trying to say the truth, right? Like, whether you agree
21 or disagree or whatever, there is a good argument to be made that the virus that
22 everybody was hit with was a biological weapon, right? So, if you look at him from the
23 standpoint -- and we don't know, because we can't trust crap coming out of our media or
24 our government in a lot of ways, so -- or our parties -- I should say, political parties.

25 So that's the problem, is that when you have so much disinformation, nobody can

1 ascertain what the actual truth is. And that was a lot of what we were having
2 conversations about, was, we don't know what they're doing to us. That's a --

3 Q Right.

4 A -- problem, right? So then it's like, what are they going to do to us, is what
5 it becomes. Right?

6 Q And so, then, the idea of being called up as a militia gets to the idea of
7 self-defense in the face of some of those forces?

8 A So Stewart had spent a lot of time with different organizations that were
9 intended to be -- that were funded, actually, to incite --

10 I'm going to go -- the dog wants out. And I've got it crated up in there.

11 The -- he had a -- I'm trying to think of how to say this. He had a lot more
12 involvement or interaction -- I mean, he could've been funded by the same people, for all
13 I know. And some of this could all just be, like, rhetoric.

14 But it was just this theory that they were creating, both sides, friction for the
15 appearance of rioting and violence and stuff like that, to try to incite the American people
16 and to try to provoke fear and stuff like that. And he didn't know how far they were
17 going to take it. Like, I guess that's the best way to explain it.

18 Q That's helpful.

19 A Like, how far is this going to go.

20 Q That's helpful. Thank you.

21 That's all I have right now, [REDACTED].

22 [REDACTED] Thanks.

23 BY [REDACTED]:

24 Q So, on December 12th, it also looks like there was a rally in Miami with
25 Mr. Roger Stone. That was in a group chat, the "Friends of Stone" group chat. Do you

1 recall this rally as well?

2 A I didn't pay attention to him.

3 Q Okay.

4 There's an individual who posts a lot of messages in the "Friends of Stone." It's
5 "A.Vidal." Do you know who that is?

6 A I don't know who that is.

7 Q Okay. What about, like, there's a "J Kretz," K-r-e-t-z, do you know who that
8 is?

9 A Not really. I don't know who any of them are. And I'm trying to go see if I
10 can find -- because there's one I end up talking to, and it may be the Vidal one, that later,
11 like, way, way down the road later, ends up messaging me, and I don't know who that is.

12 Q Okay.

13 Do you know if the Oath Keepers provided protection for Mr. Stone at this rally in
14 Miami?

15 A You know, they probably could have.

16 No, it wasn't Vidal that I was communicating with. I'm trying to remember which
17 one it was that messaged me, like, last summer.

18 They could have, for all I know, because I don't recall the Florida chapter being
19 there in December. Now, that's not to say they weren't, but I wasn't really clued in.
20 But it didn't seem like as many Oath Keepers in the December rally as there were for the
21 November rally and then for the January rally.

22 Q So, when Mr. Stone would've been coordinating this security with the Florida
23 chapter, would Mr. Stone's request have gone through Mr. Rhodes or gone directly to the
24 Florida chapter?

25 A They would've gone directly to the Florida chapter. That's what we found

1 out later, was that there was more communication -- and we don't know what that
2 communication is -- but there was more communication directly through the Florida
3 chapter and Stone and Ali than we were aware of from the national standpoint.

4 Q Do you recall -- you know Mr. Kelly Meggs, right, the president of the Florida
5 chapter?

6 A Correct.

7 Q Do you recall him around this time speaking with Mr. Enrique Tarrío? Does
8 that seem plausible to you?

9 A Yeah, I mean, it absolutely does. That's what I'm saying. Like, I know that
10 the guys from the Florida chapter end up telling me later that there was starting to
11 be -- and then --

12 Q Wait. There was starting to be a? Sorry. Just wanted you to finish that.

13 A Like, a relationship that was forming on that side.

14 Q Okay.

15 A That they ended up, like, having -- that they were doing more one-on-one
16 stuff. And I'm trying to remember if it was Stone -- they went and picked up Stone at an
17 airport and drove him home, and I'm trying to remember which Oath Keeper that was
18 down there.

19 But, anyway, I'm -- so, in hindsight, this is how I start going, okay, so there was a
20 lot more to that. And Stewart was not aware of all of the extra stuff they were starting
21 to do and associations they were starting to do. Like, he thought they were just doing a
22 couple of events and that was it. And it turns out there was, like, more of them.

23 Q How did you later find this out? Did Mr. Meggs tell you about it?

24 A It wasn't Mr. Meggs. It was the other guys in the Florida group.

25 Q Do you remember any other guys in the Florida group that later told you

1 about this?

2 A I know Nolan told me about -- I think it was Nolan that told me -- is it Nolan?
3 Dolan?

4 Q Oh. Dolan?

5 A Dolan. Dolan. I think he's the one that explains that he meets Kelly
6 Meggs for the first time and they're going to the airport to pick up Stone.

7 Q And that's Jason Dolan, right?

8 A I believe so, yes.

9 Q Do you recall an old president of the Florida chapter, Mike Adams? Do you
10 recall that name?

11 A Huh-uh.

12 Q Okay.

13 After hearing about this relationship in retrospect, did Mr. Rhodes have any
14 heartburn about the coordination or discussions that was going on between the Florida
15 chapter and the Proud Boys in Florida?

16 A So he just was starting to realize, as we were digging, that there was a lot
17 more to the story and that he was a little frustrated, would be a good way say it, to know
18 that they weren't being fully transparent with him about what all they were associating or
19 getting themselves into in Florida.

20 But, like I said, that was also -- some of the conversations we were having around
21 that time were basically, you need to be more clear on what they're doing under the
22 umbrella of Oath Keepers versus what they're doing on their personal associations.

23 Does that make sense?

24 Q That makes complete sense.

25 Did you all later learn of the Proud Boys and Oath Keepers in Florida -- and I'm

1 being specific, some of these Oath Keeper members in Florida -- did you learn of them
2 discussing plans for January 6th at all or at least being aware of where each other were
3 on January 6th?

4 A So, yes, I've learned about there being communication with different
5 factions of Proud Boys and -- but it still stays within that same Florida bubble.

6 So, basically, you have -- I see it as there being this issue of you have these
7 different control vectors for Stewart, and he's lost control of two-thirds of what he's
8 being charged with. Does that make sense?

9 Q No, yeah, it sounds like Mr. Rhodes was running almost, like, a military-type
10 operation in Florida with its own squadron or battalion or whatever, and they were
11 talking to the Proud Boys. Is that fair to say?

12 A That is fair to say. And the thing is, though, is that it's not that they -- I
13 think the concern Stewart has was that they weren't fully transparent with him over what
14 their associations were and some of, maybe, the conversations that were being had.

15 Q So, according to Mr. Rhodes -- and let's go back to this military
16 analogy -- Florida is its own squadron or battalion. It's not necessarily reporting their
17 activity with the Proud Boys up the chain to Mr. Rhodes. Is that the way he felt?

18 A Yes, that they were just getting in. And then you also had, like, the
19 North Carolina chapter split off too.

20 So, like, it was -- like, in some ways, it was the perfect storm for Stewart, because
21 he ends up with basically a Florida chapter that's, like, tucked up under Proud Boys and
22 Roger Stone that he wasn't aware of. You also had their associations with
23 North Carolina, where they're discussing breaking off and creating a whole new
24 organization, right?

25 And so all of this stuff is being done behind his back. And so he's, like, now

1 I'm -- and this is just one of the last conversations I had with him before I kind of, like,
2 said, you know, like, I can't stay associated with Powell or any of them. But I was like,
3 see, Stewart, like, you've got an issue with your guys doing, like, all of this stuff. And
4 he's just like, I don't know -- I mean, he's like, they just -- they went rogue in some ways
5 and just didn't communicate.

6 Q But here's what I'm trying to figure out, though: What did Mr. Rhodes
7 learn about the Florida Oath Keepers and the Proud Boys and their coordination for
8 January 6th?

9 A So that's the thing that's really kind of weird, is because we don't have
10 access to any of that communication, right? Other than what's been published, and
11 that's not much.

12 So the issue is, where we're getting information was, the guys that were some of
13 the last ones to get arrested were trying to SOS me, you know, at the last minute, right,
14 literally before they got arrested, to tell me, look, there was a lot more going on, you've
15 got this relationship over here and this relationship over here.

16 And that was kind of the last conversations I had with Harrelson and -- even
17 before Dolan. Dolan was trying to tell me that there was, like, more with the Roger
18 Stone stuff than I was aware of. But they're not -- they weren't privy to the
19 conversations, because they were kind of --

20 Q Okay.

21 Did you ever hear about the "1776 Returns" document floating around around this
22 time with the Proud Boys?

23 A [Nonverbal response.]

24 Q That's a negative response from the witness.

25 A No. I'm sorry.

1 Q Do you know what this document is that I'm referring to as "1776 Returns"?

2 A I don't know what that is. The only other little trap I think they've gotten
3 people into, that I've heard people complaining about, is doing affidavits where they're
4 basically extorting people, where they were, like, making demands off of their elected
5 officials. And I don't remember which idiot drafted that. But I -- I don't know about
6 that one.

7 Q Do you recall any conversations about the Proud Boys, in particular
8 Mr. Tarrío, wanting to change the Proud Boys to be more militia-like, like the Oath
9 Keepers?

10 A I'm not aware of those. I thought they looked more like militia-like than -- I
11 mean, I couldn't have distinguished if you asked me the difference. They all wore the
12 same gear and the same stuff.

13 Q And there was -- did you perceive, like, a chain of command with the Proud
14 Boys as well?

15 A Yes, I did.

16 Q And who would you have put at the top of that chain of command?

17 A Enrique Tarrío.

18 Q Okay.

19 And then going back to the point about Florida kind of being off and doing its own
20 thing, Mr. Rhodes, I mean, he was aware, though, that the Oath Keepers in Florida were
21 providing protection for Mr. Stone. I mean, we've seen that in the chats. Correct?

22 A Correct.

23 Q But that was kind of the -- was that the extent of what he thought it was,
24 was just providing PSD for Mr. Stone?

25 A Correct. He knew that there were some events that they were doing in

1 Florida, but he was not aware that there was actually, like, more of a relationship
2 forming, I guess would be a way to describe it.

3 Q So, heading into January 6th -- so let's take the, I always say, like, the Stop
4 the Steal rally period, after the election, leading up to January 6th, it is your belief that
5 there was a relationship forming between the Florida Oath Keepers and Proud Boys
6 leading up to January 6th?

7 A Yes, as well as with North Carolina and some of the other -- so, like, in my
8 mind, there's three layers.

9 Q Uh-huh. Okay. And these were relationships that were being formed
10 outside of Mr. Rhodes' and your knowledge and outside of conversations that you and
11 Mr. Rhodes were in?

12 A Correct.

13 Q Okay. And who would you have put as the point person for this
14 relationship in Florida?

15 A Kelly Meggs.

16 Q Kelly Meggs. Okay. Was there anyone else?

17 A No. Everyone -- well, I mean, pretty much everyone has kind of -- even
18 Ken -- my understanding from talking to the other guys, including Kenneth Harrelson, is
19 that they believed that Kelly Meggs was the one that was kind of driving the ship, as far as
20 forming relationships and alliances with other groups.

21 Q And was it Kelly Meggs directly just reaching out to the Proud Boys, or was
22 Mr. Stone somewhere in the mix of connecting the two groups?

23 A My understanding from communication with them is that there was a
24 relationship forming between the Proud Boys and Roger Stone. Like, there was a -- they
25 were kind of becoming more associated with that group.

1 Q Uh-huh.

2 A But then they were also describing the relationship of what was happening
3 with North Carolina.

4 So they had been directed to go ahead and start submitting letters saying that
5 they were going to leave national and that, you know, they were no longer going to be
6 associated. And that was right before the 6th. And they were supposed to turn those
7 over. And apparently right after the 6th is when Kelly Meggs collects those letters.

8 Q Okay.

9 Now, does that trigger any followup questions from any other counsel or staff?

10 Okay. So that takes us -- after the Miami rally on December 12th, the D.C. rally
11 on December 12th, that takes us to the December 14th open letter that was published by
12 you and Mr. Rhodes.

13 Of course, December 14th is the day that the electoral college met and voted.
14 The electoral college cast their votes for -- and it was delivered to the president of the
15 Senate and the State secretaries by December 23rd.

16 And on that same day, December 20- -- December 14th -- excuse me; I'm fumbling
17 with my words -- but, on December 14th, you all publish this open letter.

18 Do you recall this letter?

19 A I do.

20 Q Was the timing of this letter because of the December 14th electoral college
21 voting?

22 A Probably. Because I was working with attorneys all over the country and I
23 was working with some constitutional guys out of Texas, and we had been throwing
24 around different alternatives for how to challenge -- everybody was understanding the
25 same thing, because I had been having communication and numerous of us had had

1 conference calls discussing the problem that we were seeing, from the viewpoint that
2 what was being portrayed by the media and the hype and the "big lie" and, you know,
3 this, like, joke/mockery thing of Sidney Powell and all of that being spun up, when a lot of
4 us were on the ground and then there were issues that we were spotting in Texas, there
5 were a lot of issues that were kind of being brought up all over the country at that point,
6 and we knew they were weren't matching with the narratives that were, like, kind of
7 being publicly portrayed.

8 So we were all trying to figure out ways to delay a certification or at least give
9 people time to actually evaluate the situation and see if we could try to get rid of the
10 ones that were making a mockery of everyone and see if we could actually get to the
11 bottom of it.

12 I'm not saying that we should've changed the results or that there would've been
13 a difference in the results. The problem was that we all knew what was being portrayed
14 was not reality.

15 Does that make sense?

16 Q No, no, we understand.

17 Who did this letter go out to?

18 A He just posted it on his -- okay. So I know he gets with Marcia Strickler and
19 wants her to deliver it. I don't think she does, but she's --

20 Q Who's Marcia Strickler?

21 A Marcia Strickler is just one of his donors, and she's a former Dell employee,
22 and she lives in the Austin area, in -- oh, shoot.

23 Q She's in Austin. Does she have a relationship with Mr. Jones, Mr. Alex
24 Jones?

25 A No. She doesn't like Alex Jones, actually.

1 Q Okay.

2 A She actually thinks he's kind of a POS, and we've shared that viewpoint.

3 But Marcia is just a lady who's kind of -- like, she took up advocating at the capitol
4 for election reform. She's just -- she's just a -- she's a good lady, actually.

5 And Stewart, I know, after he pinned it -- or, "he pinned it" -- we pinned it. Mine
6 was really just, like, Stewart, help me get something out that just says, like, hey, we need
7 a breather here because of all of this garbage. We need, like, either a new election or
8 we need something to stop to evaluate what happened in this election, I don't know,
9 something. Because it's just a mess, it's a trainwreck, and we're not gaining any traction
10 because there's so much disinformation everywhere.

11 Q Right.

12 A We're even -- like, even the attorneys, when we're doing our conference
13 calls, we're even not sure what we're seeing. And, I mean, these are, like, smart
14 attorneys. This isn't -- no offense to Sidney and all of that group. This is, like, actually
15 the ones that are more intelligent than I am. This is, like, former Supreme Court Justices
16 and stuff like that from different States.

17 So they're realizing we've got a problem. I'm realizing we've got a problem. I'm
18 like, Stewart, what do we do? You know, like, what are our options? He and I go
19 through some options. And so, like, it's just we're trying to formulate ideas for how to
20 at least evaluate what the hell's going on.

21 And Marcia he asked to take the letter to D.C. I wasn't a part of any of that.
22 And I don't know. Like, you know, I wish I had asked Stewart -- he wouldn't have told
23 me, because he was -- but it's like, what did you know from, like, Roger Stone and Alex
24 Jones? Like, I wish in hindsight I had asked him, like, what did you know? You know?

1

2 [2:41 p.m.]

3 [REDACTED]. Right. I'm going to actually turn it over to [REDACTED] now.

4 [REDACTED]. Thank you.

5 Ms. SoRelle, thanks for staying with us this long. I know it's already been a long
6 day.

7 But I'm curious about this letter. And actually can we pull it up on exhibit 7?

8 [REDACTED]. Sorry. I'm doing the exhibits right now, so it's a bit slower than
9 usual.10 Ms. SoRelle. That's okay. You're better than I am.

11 BY [REDACTED]:

12 Q Can we go down to page 5, please, at the top?

13 So the letter goes through -- I mean, the letter is framed as an open letter to
14 President Trump and calls on him to do a couple of things.

15 And number 3 on page 5 is, "Call the militia into federal service."

16 You know, we were talking before about how invoking the Insurrection Act would
17 kind of be a pause on things while, you know, you figured out the situation. I'm curious
18 what it means to call the militia into Federal service and what that would mean in
19 practical terms.20 A So if you -- if you know the history of Stewart, he's actually quite intelligent
21 on the -- he went to Yale Law. Won some awards for his work.22 So I don't necessarily know or can really assess his assessment of the militia, but I
23 know that there are a lot of people that have a similar viewpoint of that as far as how to
24 defend the Republic.

25 So he's looking at this, and this is where everybody's got the narrative wrong. He

1 was never offensive. Stewart was always defensive in nature, and he was always
2 wanting a way.

3 So if this was a military coup, in his mind, right, his mind would have said: How
4 do we prevent military occupation in the United States, right? So how do you activate a
5 way to protect the homeland from a potential military occupation of the country, right?

6 And he's looking at it, because I'll be honest with you, I say -- I say bring the
7 military in. He's, like, no, you don't ever do that because of the Spanish Civil War. I
8 told you he's obsessed with the Spanish Civil War.

9 So any of his stuff is going to be either you've got an issue with rogue agents hiring
10 and supplying -- and this includes Proud Boys, by the way, because if you really get into
11 the funding on both of them -- and he and I have had this conversation, that a lot of the
12 dark money funds both the same groups. Like they're funding both sides of the same.

13 So you've got, like, BLM, antifa being funded by the same people that are funding
14 probably Proud Boys and, hell, maybe Oath Keepers to a certain extent. I don't know.

15 But he and I had discussed the fact that you've got this dual thing being created,
16 right? So Stewart was actually getting to a point where he was realizing we've got, like,
17 basically the creation of these people, like, armies that are, like, being, like, private
18 armies, right, or at least pains in the butt on society, that have their own people that are
19 provoking.

20 So even if BLM was going to have a peaceful rally, you still have the provocateurs
21 being inserted, because we know -- this is what we figure out in all of this is, ah, Proud
22 Boys will occupy those as their provocateurs and vice versa, okay? And so he and I
23 realized that.

24 And because of that, he's also concerned because there's this, like, spinning
25 narrative that you've got like Alex Jones and all of them kind of and General Flynn and

1 everybody kind of like ramping up. And he's just like, hey, we need to get the people to
2 form a bubble from all of these actors that are creating this crap.

3 I know that doesn't make sense to you, but I understood what he was saying. It
4 was defensive.

5 Where did y'all go?

6 Q I'm sorry. I was on mute.

7 A There you go.

8 Q Can you help me understand why you thought that President Trump in all of
9 this, you know, complicated -- these complicated relationships that you laid out, why you
10 trusted President Trump and not some of these other major actors?

11 A I really didn't necessarily trust one versus another. It was really just a hope
12 that somebody somewhere would, like, put a hold in -- I mean, like, because there's so
13 little truth, we just need somebody to be, like, whoa, time out here, guys, we're getting a
14 little -- we're spiraling over here.

15 And that's the point. Like he's got "fire Wray" in here. I would not have put
16 "fire Wray" in there. Like so this is what I'm saying. This is, like, a compilation of stuff.
17 But it doesn't necessarily represent my views 100 percent and his views. Do you see
18 what I'm saying?

19 So I would have thought --

20 Q So even though you signed the letter, it's kind of a -- it's more of a Rhodes
21 document, you would say?

22 A No, not necessarily. I was helping him with some of the quotes and stuff.

23 But, like, that's definitely his -- I agree with dumping the data. So, you know, I
24 was never going to disagree with that one. As a matter of fact, there was a sign in the
25 December rally where I'm holding, like, set us free. Like, get the politicians out of here

1 that are dirty, and let's move on.

2 See, I don't agree with his number 2 at all. But I understood his number 3 as a
3 defensive aspect. He just doesn't -- and I don't know. I don't know.

4 Q So --

5 A I have no earthly idea on some of that.

6 Q So, staying on number 3, one thing that the letter says is, "Call up all
7 able-bodied Americans between the ages of 17 to 45 who are still loyal to the
8 Constitution to likewise report for duty."

9 I guess a broader question is, you know, what gives you or Mr. Rhodes the
10 perspective or authority to determine who are, you know, people who are faithful to the
11 Constitution or loyal to the Constitution versus the traitors that are referred to elsewhere
12 in the letter?

13 A Have you seen how much China and Russian influence are in our country? I
14 mean, you can just look at how much money our government is funneling out to foreign
15 governments and how much influence is actually being bought in our country. I mean,
16 these are -- this is basic mainstream media here. We're not even, like, trying go
17 controversial here. This is just a basic Google search who all is tied into what.

18 We've got Texas, where I sat on the border and I watched a military base be
19 bought through our KNR reports which would actually be these FBI border reports for
20 border patrol and all of that where we would get them through our joint task force. And
21 I watched China build a military base 60 miles south of my border. And then I watched
22 my governor sell a chunk of a freaking -- that wind farm almost directly north of it.

23 There's a lot of concerns for foreign influence in our country. And all we need is
24 somebody just to, like, okay, everybody, to your corner. Let's see who all's done what
25 and where. I mean, look, there was --

1 Q What I'm getting at -- and I'm sorry to cut you off -- what I'm getting at is,
2 you know, Americans who voted for Joe Biden or supported Joe Biden, you know, are
3 those people who would fall into the category of Americans between the ages of 17 to 45
4 who are still loyal to the Constitution?

5 A Sure. Yeah. But, see, here's the thing. This is the problem for the
6 left-side media. There's narratives over there that are completely and totally insane,
7 too.

8 This is the problem. There's got to be somebody who protects our constitutional
9 foundation, and we don't have that anywhere because media is spinning two freaking
10 insane narratives on both extreme sides.

11 I've actually come to learn that the fake news narrative is somewhat true but not
12 quite because they'll give the facts. They just don't -- which I get it, they're not doing
13 any opinion type work. But what I'm saying is, is that we do have a foreign influence
14 problem in this country and it has nothing to do.

15 He's giving his wish list of how to restore a constitutional republic. He's not
16 necessarily saying we need to reinstall Trump. What he's saying is we have a problem
17 and we can't get to the resolution because nobody's telling us the truth. And it's the
18 same damn thing that this whole letter is about.

19 And for that, I agree with him wholeheartedly. It has nothing to do with who's
20 sitting in the executive office. When we realize that nobody was willing to tell the truth,
21 neither side, was both spinning a narrative, then we can't ascertain the truth anymore.
22 And when you can't ascertain the truth anymore, it doesn't matter if you install Biden.
23 It doesn't matter if you install Trump. The fact is this is an installation.

24 The same goes for Congress when you fail to comply with the law. And that's
25 what we're facing in this country, is lawlessness by our leadership, not by the people.

1 Q So I think I'm tracking what you're saying. And, you know, it's consistent
2 with the things that we've discussed earlier in the deposition.

3 But my question is, you know, if you're concerned about lawlessness in leadership
4 or the legitimacy of elected officials, why is Donald Trump different? I mean, this letter
5 is addressed to him to ask him to invoke the Insurrection Act and take control. But I
6 mean, is Donald Trump different from the other lawmakers who are compromised, as
7 you've outlined?

8 A Well, I don't know. That's a very good question. But the fact is he was
9 the Commander in Chief at the time. And the fact is, is I saw enough evidence. And
10 there was about 40 or 50 of us that actually knew we had a problem.

11 Now, do we know that it would have changed the outcome? Probably. You
12 know why? Because the law wasn't complied with. And what we would have gotten
13 ourselves was a new election. Because there's a reason why our constitutionally
14 protected rights, like our right to vote, which is a fundamental right, is protected. And
15 that's why the law and strict compliance with the law is relevant.

16 So, yeah, I was looking at it from a different perspective than I wanted to overturn
17 the U.S. Government. What I wanted to do -- or uninstall somebody who's been
18 installed. That's the point. I wanted a lawful election. I wanted, like, to know that
19 we could trust our system, because I sat there and personally witnessed things. I talked
20 to thousands of people -- well, not thousands. I know there were thousands of
21 affidavits by the time we were done. But there were significant witnesses that I
22 personally interacted with that were telling stories that were pretty appalling.

23 And it wasn't that I'm blaming the Democrats either, because if you notice, I
24 started with saying I knew the Republicans, something was wrong on the Republican side.
25 And I knew that the fact that they were blaming the Democrats was a problem.

1 So, yes, I had lots of problems with what I was watching. And he is trying to give
2 me solutions and everybody a solution. I'm not saying they're great solutions. Are we
3 the ones to make these decisions? No. Are we just regular Americans? Yes. But
4 were we in the middle of stuff that were causing us concerns? Yes.

5 Q So in the couple of weeks between the election and January 6th, did you
6 ever get a sense that President Trump was aware of the calls to have him invoke the
7 Insurrection Act or that he was considering it?

8 A No. I mean, not anything other than what Sidney Powell -- and that was
9 the other thing, too, that was really concerning, is that I knew she was full of shit. And it
10 was concerning for me for her to be lying to people, and especially in that type of position
11 that would have actually got him in trouble.

12 Like him, hate him, love him, whatever, it doesn't matter. The games that were
13 being played were dangerous, as we saw with the 6th, right?

14 Q Do you think President Trump ever read Stewart's open letter to him?

15 A No, I don't think so. I have no reason to believe he did.

16 Q Got it. And then, you know, if you were drafting this and posting it and
17 distributing it with kind of the expected -- the expectation that President Trump would
18 not read it, what kind of message were you trying to send for the people who did read it?

19 A That we have --

20 Q They wouldn't be able to invoke the Insurrection Act.

21 A But they could help by trying to get something somewhere.

22 See, that's the thing that everybody forgets, is that, like, we, the people, actually
23 have a lot of power if we're on the right point, right? We learn that with Texas
24 lockdowns. If we're arguing truth, we can accomplish all kinds of things, which is why
25 they don't really want us having truth, right?

1 Because then we're missing the bullet. Like we're missing the bull's-eye, like,
2 and the target. We're off-center. And since we're off-center, we get no traction. But
3 if you stick to the truth, then guess what? We might actually figure something out.

4 So what we were trying to do is, like, hey, people, here's a list of things that we
5 can do. Here's things that we can try to figure out. But let's get to, like, some
6 truthfulness here. Let's get to some, like, meat and potatoes that are necessary in this
7 country. Otherwise, I don't know what games are being played.

8 And I'll be honest with you. Trump has -- it's not about Trump in the sense that I
9 knew it would be easier not to have to fight with the left over fighting the mandates than
10 it would be if Biden was in office, because then you have to go through the left.

11 If I'm just having to knock on Trump, I can do that with the Republicans. I got
12 them like that, right? Like they're easy to grab ahold of. It is more difficult to grab
13 ahold of people, when you're fighting the left, to get a narrative like shifted.

14 So, like, I ended up writing a letter for -- I've done an exemption letter that gave
15 notice when they were trying to unlawfully do the mandates, right? And I distributed
16 that through several doctors and stuff like that. It went really far actually. I'm quite
17 impressed.

18 But the point was is the exemption was is, look, you're denying people basic legal
19 rights here, because they have a right to informed consent. And when you're forcing
20 them by an employer to go do something, this is my point. I didn't want to have to do
21 that part of it, which is why I believed they wanted the left in there, is because it's easier,
22 because you get a layer of protection by the leftist media, right? It's harder when you
23 can actually do something, because the right is easier to push around.

24 Q Uh-huh.

25 A That's the truth. That is absolutely the truth. I looked at this from the

1 mandate standpoint. And it is easier, because I did it in Texas, it is easier for me to grab
2 the Republicans by the -- like by the horns and be, like, no, we're not going to do this.
3 Actually the Republicans were decent on that but not fast enough.

4 But it was just -- it was my concerns for what I perceived as the easier route to
5 figure out what was going on in this country and what they were heading us into.

6 And it wasn't like I pulled this stuff out of like -- I mean, they literally walked in and
7 started going over stuff that you could read in the WEF, and that was at the very
8 beginning. I hadn't even looked at that stuff yet.

9 So my first introduction on lockdowns is going straight into a global plan with
10 Agenda 2030 or whatever number you want to throw it on, because all you have to do is
11 listen to that, which you can't, and it was a presentation and they don't turn it over. I
12 tried to get it from them. But their presentation was exactly the stuff that I went and
13 researched after the fact.

14 So when I'm looking at those things, I'm like what is going on here and what is the
15 end goal? I just want to know the truth. That's all I want. You're giving me this as a
16 plan for what the future of this city is going to be and what the future of this State is and
17 what a couple of other States look like and how the corridors connect and things like that.
18 But you're not telling the people this.

19 So you keep going 6 months in advance, and I'm looking at an election that is an
20 absolute shit show. I'm, like, how do I stop all of this, to put a pause in, so somehow,
21 some way -- and I don't even know how you'd ever get over the media anyway. But the
22 whole point was just wanting to see if there was some way that we could actually get or
23 ascertain the truth of something. That's it. That's all. It's very simple.

24 [REDACTED]: Got it. That's extremely helpful. Thank you.

25 I'll turn it back to [REDACTED].

1 You're on mute.

2 ██████████ Thank you.

3 BY ██████████:

4 Q So shortly after this December 14th letter was published, former President
5 Trump tweets on December 19th about the protests on December -- on January 6th. Is
6 that -- do you recall the tweet?

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

8 Q Okay. Did you follow the President on Twitter at all?

9 A I think I did. But, I mean, y'all, like, make me out to be a raving -- like, I
10 mean, I didn't have an issue with President Trump. But I wasn't also like a diehard.
11 Like, look, my issues stemmed from what was happening in the country. I was
12 not -- you're slapping something on there, trying to make it out to be something it's not.

13 Q Okay. Well, no, I just want -- so this is exhibit 8. It's former President
14 Trump's tweet. And all I'm saying is, the only point we're trying to make here is that this
15 is the first time that former President Trump acknowledges January 6th. So he says, "Big
16 protest in D.C. on January 6th. Be there, will be wild!"

17 I guess the question is, did the Oath Keepers, that you can remember, start now
18 planning for January 6th in terms of showing up in D.C. after this tweet or before? It
19 appears from your messages it starts after this tweet.

20 A Then it would have been whenever they started coordinating through Ali
21 Alexander.

22 This is what I'm saying. It wasn't based on President Trump. Everything was
23 done off of the coordination that was being sent out. Like, here's our next rally.
24 What's the next plan? Like, can you do security for this? Here's the events that we're
25 planning. I knew about January 6th from Bianca Gracia.

1 Q Okay. So, no, that's great. That's great for us to know.

2 So it appears that, like you said with the other rallies, Mr. Rhodes and the Oath
3 Keepers started tracking January 6th once Mr. Alexander made them aware of
4 January 6th as the next kind of rally date. Is that fair?

5 A That's fair. I mean, that's what all of -- this is what I'm saying. It wasn't
6 tied to anything other than what was being offered up, right?

7 Q Yep.

8 A And then -- go ahead. I'm sorry.

9 Q No, I was going say, so right after Mr. Alexander, probably around the 19th
10 range, that's when Mr. Alexander starts to talk about the January 6th rally as well, we
11 know that Mr. Rhodes had a December 22nd meeting with regional Oath Keeper leaders.

12 Do you recall this meeting approximately December 22nd?

13 A I think I was on the call for a portion of it because he had -- I actually went
14 up to Chad's -- I think I went up to Chad's because then we were in the car and I had to go
15 to a store for Christmas shopping.

16 Q That makes sense on December 22nd.

17 Who's Chad?

18 A This is what I'm saying. Like I know they had a call. I was on it for, like, a
19 blip because I had gone up to Chad's --

20 Q Who is Chad?

21 A Chad Rogers, which is where he was arrested in Little Elm.

22 Q Got it.

23 A I had gone up there and I'm -- I don't -- I think I was at a -- what the heck is
24 that store -- sporting goods store. Anyway, we had gone to a sporting goods store. So
25 I was on the call for, like, 5 minutes, like, while they were starting it. And then he got

1 there and I got out and I went into the store, because I was getting some stuff for my son.

2 Q How does this call even come about? Does Mr. Rhodes send out a
3 message, "We're going to have a call on this date"? Like how does it even originate?

4 A So that's what it was. Like after they decided -- so that's what it is. So he
5 sends out a -- like, let me just give you -- like Ali would say here's the event that we've
6 got. Here's the next dates, whatever.

7 Stewart would then go to his leadership group or to somebody and say, hey, we're
8 going to -- does anybody want to participate in this rally? Do we want to go ahead and
9 do this one?

10 And then the group would then -- so he would say if we're going to do it, let's do a
11 call and decide if we're going to participate or, you know, everybody give me your
12 feedback and then we can schedule a call or whatever.

13 Q Okay.

14 A So that's my understanding of how those things all worked, was that it was
15 basically a coordination of, like, then at that point see who was interested, what chapters
16 were interested, who was going to be able to attend, to determine if there was enough
17 interest to be able to do it or not. You know, he might be, like, sure, yeah, we're going
18 to do it with Ali. But he may not really know if he has enough or not. You know what I
19 mean?

20 Q No, that makes complete sense. So it's almost like a leadership meeting to
21 even decide whether the Oath Keepers can participate after Mr. Rhodes receives words
22 from Mr. -- or receives word from Mr. Alexander. Is that correct?

23 A Exactly.

24 Q So that's what you recall the meeting being about, like, are we going to do
25 this event? Do we have enough --

1 A That was literally, because it wasn't GoToMeeting, but it was -- maybe it was
2 GoToMeeting. I don't know. But like it started out -- I mean, there was a lot of people,
3 like, what are we going to do? Like, you know, we don't want any more lockdowns.
4 We don't want this stuff. Like there was that grumbling.

5 But then I know Stewart was trying to redirect it at one point, saying, like -- and
6 that was pretty much when I was leaving is when they were talking about, do we have
7 interest to do the January 6th rally, is anybody interested in going to D.C., that kind of
8 stuff? And then that was pretty much when I bailed out. Like, so I don't know what
9 happened after that but --

10 Q That's fair. Do you recall Mr. Rhodes saying anything about why
11 Mr. Alexander was having this rally on January 6th? Was it due to, you know, Congress
12 meeting on that day to certify the vote? Was that part of the reason why there was
13 going to be a rally in D.C. on that day?

14 A Yes. But with that being said, it was never to stop any challenges that
15 would have occurred. See, that's the funny part about the narrative of everybody with
16 everybody accusing everybody of wanting to prevent Congress from doing what they
17 were, you know, doing at that point.

18 I mean, to me, this rally was harmful to our cause. That's what's funny about it.
19 Because if --

20 Q Let me stop you real quick, though, because Mr. Rhodes, you said earlier
21 Mr. Rhodes wasn't tracking any conversations, for example, between the Florida Oath
22 Keepers and the Proud Boys.

23 Is it in the realm of possibility that the Florida Oath Keepers and the Proud Boys
24 could have been talking about delaying a certification vote on January 6th without
25 Mr. Rhodes knowing?

1 A I have no earthly idea.

2 Q Right. So I guess that's what we're trying to figure out. Did you hear any
3 rumblings of the Florida Oath Keepers talking to the Proud Boys about January 6th and
4 delaying the vote at all?

5 A Well, but hold on here. This is what I'm trying to say.

6 At the time -- this is where everybody's narrative is crap. Okay? At the time
7 that the Proud Boys breached, that first initial breach were all occurring and getting to
8 the Capitol and things were starting to be chaotic, I wasn't there. Stewart wasn't there.
9 The Oath Keepers weren't there. Right?

10 The problem is, is do you know where my butt was? It was at a hotel. And why
11 it was at a hotel was because I was wanting to see if they were actually going to have
12 meaningful hearings on the actual votes from the five contested States, right?

13 So this is the problem with the narrative that gets spun out. It's not about
14 delaying the certification. It's about Congress doing what Congress was going to do. I
15 wanted that to happen.

16 Q Well, I'm jump ahead then. Then why are the Proud Boys even breaching
17 the gates then at that time?

18 A It's a very good question. This is my problem with the whole issue, which is
19 why I think General Flynn -- or Trump or whoever -- has a different viewpoint of what
20 should have occurred that day, but it wasn't my viewpoint. My viewpoint was to let the
21 system do what the system should do. Does that make sense?

22 Q No, that makes complete sense. We understand your viewpoint. I think
23 we're understanding.

24 What we're trying to understand is why, and you mention it, the Proud Boys being
25 at that front gate, why right before 1 p.m. there's a breach of that gate. That's what

1 we're trying to understand here, Ms. SoRelle.

2 A So my personal assessment of a year and a half of this train wreck disaster
3 that has been in my life is that the Republicans did something bad and then they used the
4 Republicans to prevent any meaningful challenge to the electoral college counting of the
5 ballots by Congress.

6 And it was convenient to create chaos, which is consistent with Byrne sitting with
7 me in a restaurant in Waco at the very end of the year last year, asking me that, if my
8 case is successful, then can I please support General Flynn.

9 Q Got you. So going on around the same time, though -- and I can pull up the
10 exhibit if you want me to -- but we do see a chat that you produced to us. And it is with
11 the Oath Keeper southeast region forum, open forum. And you-all -- it appears a guy or
12 a woman named Red Pill Patriot is tracking developments at the Oregon State capitol.

13 Do you remember this text at all?

14 A I do, but I don't know anything about this stuff.

15 So the FBI asked me about that. I didn't know they were doing really the capitol
16 stuff. And then they chew me out for, like, my statements at the dinner after the 6th
17 with the 1AP guys. And I was, like, that's not what I said. And if you know my history,
18 then you understand what my point is.

19 No, there was no reasons to go overthrow any capitols. I don't know why
20 everybody's getting hostile and butt hurt. I would ask 1AP those questions.

21 And, no, Stewart wasn't occupying or telling anybody to go overthrow any capitols
22 anywhere. As a market of fact, he and I would have done exactly what we did in Texas,
23 which is why I said, I guess it's back to the States, because if you want to clean up your
24 elections, you go back to your States and you force them to do it because that's where
25 the inherent power to the people provision is in all but two States.

1 Q Who is Red Pill Patriot? Do you know who that is?

2 A I have no clue.

3 Q Okay. And just another question. This is about so semantics, I guess.

4 But why are these individuals taking over the Oregon capitol being referred to as
5 patriots?

6 A I have no earthly idea.

7 Q We see the language with Mr. Rhodes on January 6th as well, "patriots."
8 Why are these individuals being labeled as "patriots"?

9 A I have no earthly idea. Because that's just the Republican thing. It's not
10 even patriots like as in they're going to do something. It's just that's what we call each
11 other. That's like, like, whatever.

12 Q So you viewed these individuals as "what we call each other" is what you
13 said, so individuals that might be aligned with Mr. Rhodes or you in some type of way. I
14 don't know. I don't want to put parameters on how you're aligned.

15 A But, see, I don't know really what they were doing at the Oregon capitol.
16 Like, I think they went and occupied it, right?

17 Q Yeah.

18 A But they weren't violent, right? Or were they?

19 Q They were.

20 A I don't know. I have no earthly idea.

21 Q Okay.

22 A And then my next question is, because of the way I know of what happens in
23 Oregon and all of these States now is, how many of those people were the same people
24 paid for by Proud Boys as the same ones paid for BLM or antifa?

25 See, this is the problem that I am starting -- that I fully am aware of, right, is this is

1 a game for us, not for them.

2 So this is a narrative you need to hear so you can demonize patriots when, in
3 reality, I'm sitting over here, going, okay, who paid for it?

4 Q Who's paying both antifa and the Proud Boys?

5 A So you have Russia. You have Soros. You have all of them paying for this
6 shit. You understand? So it's a game. It's a sick game. And it's a sick game for you
7 to be sitting here asking me these questions when the truth is they're setting us up. Big
8 money, big foreign interest, big corporate interest, all of this stuff, they don't give a crap
9 about us. We're fucking cows.

10 Q I will keep it moving --

11 A Sorry.

12 Q -- unless there are any other questions --

13 A Sorry.

14 Q -- on the timeline.

15 Any other questions, [REDACTED]?

16 Okay. I'll keep it moving to the December 23rd open letter.

17 Mr. Prasanna, did you want to ask about that? And I can pull up the exhibit if
18 you want me to.

19 [REDACTED]. Sure.

20 Yeah, [REDACTED], if you could pull up exhibit 15.

21 Ms. SoRelle. I'm going to make y'all patriots before this is over.

22 [REDACTED]. We already are.

23 [REDACTED]. I'd argue we are patriots.

24 [Laughter.]

25 BY [REDACTED]:

1 Q So this is a second open letter to President Trump that Mr. Rhodes published
2 on December 23rd. This is the date that the electoral college votes were due to the
3 President of the Senate and the State secretaries of state.

4 Do you remember whether there was a significance of publishing this letter on
5 that date, given what was happening with the electoral college votes?

6 A I mean, I'm sure it was, because it's like a big news topic. I mean, see,
7 everybody's trying to be, like, oh, they're trying to stop this. Oh, yeah, yeah, I was
8 because I couldn't figure out what the hell was going on. But not for the reasons y'all
9 want to spin it for. And I damn sure wouldn't have wanted to stop Congress.

10 Q I'm sorry. A helicopter just flew over my house just then and I couldn't
11 hear what you said.

12 A I was just saying I would not have wanted to stop Congress. I wanted to
13 have the challenge.

14 Look, it's about the rule of law and the process of law, right? I mean, if you
15 notice, everything that we're advocating for are legal remedies. See, this is the problem
16 with a lot of these narratives is that Stewart and I were absolutely, like, hey, what all legal
17 remedies do we have? We weren't, like, hey, let's go beat the shit out of people.

18 Q So you signed this letter, right?

19 A I think so. I'm pretty sure. I don't even know if I was -- I don't know
20 which one -- I don't know what the distinction is between the last one.

21 Q Mr. [REDACTED], can you go to page 8 towards the bottom?

22 So the letter encourages President Trump again to invoke the Insurrection Act to
23 keep the peace while SOCOM investigates the election results.

24 But I just want to look at the second to last paragraph where it starts, "If you fail
25 to do your duty." Later in the paragraph it says, quote, "We will take to arms in defense

1 of our God given liberty, we will declare our independence from that puppet regime, and
2 we will fight for our liberty," end quote. So --

3 A Correct. And you know how you do that? You go back to your States,
4 which is what I then follow up to say after the 6th, I guess it's back to our States where all
5 but two States have inherent power to the people provisions.

6 And I can guarantee you, if you read, he says defense. He does not ever say
7 offense, which is what he has consistently done the entire time, while I have gone around
8 flipping the stuff and making sure that our rights are protected.

9 So, no, your narratives fail again because he's saying, I will stand by whoever is
10 standing up to protect your rights, my rights, and everybody else's rights. And that is
11 what he's saying. And if you ask me what it is, I will tell you, I did it in May of 2020 when
12 I reopened Texas.

13 Q Got it. Well, so I guess it goes without saying that President Trump did not
14 invoke the Insurrection Act. So I guess I'm wondering what was next, because, you
15 know, by that mark, President Trump failed to do his duty according to this letter.

16 A We will "walk in the Founders' footsteps by declaring the regime illegitimate,
17 incapable of representing us, destructive of the just ends of government," which they are,
18 and to secure liberty. We're going take our butts back to the States, which if you read
19 Texas, even, if you pick up any State and you find the inherent power provision, that's
20 what you do.

21 And I can guarantee you, as soon as I'm done with this right here, I've already got
22 groups ready. Because you know what? We're going have our vote back. I don't
23 care what the puppets in D.C. have to say, we're going to get our States back. And it will
24 be done peacefully and it will done the same way that I did it before, which is all you have
25 to do is start county by county, district by district, and you start pulling it back.

1 And you pull back your republican form of government. And by that, it means
2 representative form of government, in case you think I'm trying to pull a Republican term
3 here. I will go back and I will correct what they are doing. And that's what they don't
4 want us to do.

5 Q Well, you know, just to quote from the letter, it says, "We will take to arms."

6 A Yeah.

7 Q And later on it says, "We will fight for our liberty."

8 So help me understand. Is this an armed conflict that is envisioned?

9 A He's still saying defense of, right?

10 Q Right.

11 A Because what is going to happen next that I am going to personally do will
12 piss them off. Do you understand?

13 I am following the law. We are advocating legal remedies. There is not an
14 argument contrary to that, that anybody -- because Greg Abbott had to step back.

15 I know what the power of the people are. And you should, too. It's quite
16 disappointing that you guys don't understand how powerful we actually are, because the
17 reality is, is if you get control of the majority of these States in this country, then we can
18 effectuate the change we have to, lawfully, at the Federal level. And that's what they're
19 afraid of.

20 Q Got it. Well, I guess --

21 A What he's saying is --

22 Q I'm just trying to understand at what point --

23 A He's trying to sound scary, meaning we will protect us. We will do what it
24 takes for the people to be heard.

25 And that does not mean offensive. That means defensive. That means the

1 same thing he's done when they carry around their guns and everybody bitches about it,
2 is the truth is, while he's doing that, I get to accomplish something.

3 Q So I hear you, and I see the word "defense" in there.

4 Help me understand at what point defense becomes necessary --

5 A When they attack us while we're trying to effectuate the change we needed
6 to change.

7 See, this is why I'm telling you, you have to look at what we accomplished in Texas
8 in a very short period of time, and I did it purely with legal arguments. Why do you
9 think they don't like me? I did it because basically they had no authority under law to
10 act the way they are acting right now. That is my point.

11 And my point is, is the next steps, if you can't get it done at the Federal level, if the
12 Feds won't stand down and do their job, then we go back to our States.

13 And that's what the militia actually is good for, is the protection of the people of
14 the local levels to be able to effectuate the needs -- the changes needed by corporate
15 America and special interest America that has diluted our rights, has benefited
16 themselves, and done whatever they could to install an oligarchy in this country.

17 And that's pretty simple if you go read the Brookings Institute Democracy
18 Playbook. It tells you right there how to prevent us from being able to take back our
19 country. And that does not mean in a physical conflict, because you can do all of this,
20 because our Founders' footsteps, if you read it, they left us constitutions at the Federal
21 level and at the State level.

22 And our State level guarantees us the right to be able to change, modify, amend,
23 abolish, whatever we need to do, as long as we do it as a republic, meaning we all do it
24 individually at a local level.

25 And we can change whatever changes we need to make there. We can make the

1 changes we need to at the State. And that is what they're scared of. Because if we did
2 that and we started doing that, what do you think they're going to do to us?

3 This is what Stewart's saying. Stewart was afraid of the Feds. But Stewart
4 understood what I needed to do. He understood what a lot of us need to do. And, you
5 know, it's cowardly to protect it.

6 Q Got it.

7 A This is what I'm saying. This isn't about Trump. Everybody wants to make
8 this about Trump worship. It is not about Trump.

9 It is about the people not having a voice or any ability to effectuate anything in
10 this country without being manipulated by people like Sidney Powell and General Flynn
11 and all of them to prevent us to actually accomplishing something that would unify the
12 people and fix it. And that's what we watched in the audits.

13 Q Understood.

14 [REDACTED], can we go to exhibit 9 at page 13? I think can you go to the
15 bottom of the page?

16 So that letter that we just talked about was published on December 23rd.

17 The day before that, according to the Justice Department, Mr. Rhodes stated that
18 if President-elect Biden were to assume the Presidency, quote, "We will have to do a
19 bloody, massively bloody revolution against them. That's what's going to have to
20 happen."

21 So that doesn't sound defensive to me. That sounds offensive. So help me
22 understand where the disconnect is happening.

23 A So what's really fun about what they've done with the Justice
24 Department -- and they're already busted on it on numerous occasions and it's getting
25 kind of sick and hilarious at this point -- is they have cherry-picked shit.

1 So when they give you that line, they didn't give you the before or the three
2 before or the sequence of five or six, right?

3 And how can I produce that for you so you can read it? Because it's missing. So
4 what you're missing on this is what was before or what was after that.

5 I don't know what he meant. He could have said because we're going to our
6 States to use our constitutions and do what we need to do and they're going to come get
7 us and we'll probably end up in a bloody civil war. You don't know.

8 So it's a great one-liner. It's great for them to have a spin narrative off of. It's
9 great to inflame and incite and keep everybody jumping up and down. But I don't know.

10 And, no, I've never, ever seen really anything that, if you looked at a full context of
11 what he's saying, is he saying things in an offensive manner. As a matter of fact, if you
12 look at the group chats that I did provide to you, a lot of it you do see Stewart telling
13 people to calm down, chill out, whatever. All right?

14 So what you're missing in a lot of this is the context. And I don't know what that
15 context actually is. He may have screwed up and said something stupid. I don't know.

16 But what I'm telling you is, is I'm not going to say one way or another what he
17 meant by that because I don't know what was three before that or four before that or
18 what was in the sequence after that. I have no earthly idea.

19 Because they did it to me personally with the shit that they've spewed to y'all
20 about what I've said, because they took that out of context. And the last one they put
21 out I'm pretty sure is fake. And I can't validate my shit either, but I know what I said.

22 Q So you've never heard Stewart talk about a bloody revolution?

23 A Uh-huh. That's what happens when your country attacks you, because
24 they're going to a global system without your consent. And when the people finally
25 catch on to it, and we're in the process of doing what I said where we go and use our

1 State constitutions which allow us to fix it, and they attack us again like they did on the
2 6th, because who do you think actually paid for the people that were the provocateurs?

3 Nobody has told me how the Ukrainians or whatever from the Eastern European
4 bloc that was there, the 30 of them. And I watched them beat on the north door.

5 So you know what? I don't know. But I'm pretty sure that's what he's saying, is
6 he knows the same thing I freaking know, which is they're going attack us like they've
7 already done.

8 And if you think I'm joking or you think I'm being wrong, look at the 6th, because
9 I'm pretty sure, if you look at it, my posse was actually the ones that were just there.

10 Q So Mr. Rhodes has, you know, in public forums -- and this is one example of
11 a quote that we have up on the screen -- but just a few weeks prior to that during his
12 speech at the Jericho March in D.C., he also talked about the need for folks like the Oath
13 Keepers to mount a much more desperate and much more bloody war to ensure that
14 President Trump or President Biden doesn't take office.

15 A I have no earthly idea because I don't know what the context of all of it is. I
16 really don't. I don't recall that far back.

17 But I know what he knows which is what I knew. It was never about Biden. It
18 was never about Trump. It was what they had collectively done to our country and what
19 they were in the process of doing that was the problem.

20 It is easier to deal with the Republicans than it is to deal with the left. That's just
21 the truth.

22 Q So you noted -- and we saw this in some of the chats that you
23 produced -- that Stewart was often in the position of calming down people.

24 Was there a difference between what he was putting out publicly versus how he
25 was talking to Oath Keepers in private?

1 A Probably. I mean, I won't -- that I agree, because I've listened to some of it.
2 But I still don't know his full context on this. And he did really believe and I agree with
3 him.

4 This is why I asked. I don't know what he knows from General Flynn's
5 perspective, okay, and that's why it's relevant to me, because all of those guys are firm
6 believers, not that they're going to be the offensive aspect of this, right, but they all
7 believe we're going to end up in a war. You've heard it from Flynn, too. I don't know
8 what all of that comes from. Like, I don't.

9 But I know that there is a lot of people in this country -- and I mean a lot. The
10 same way the FBI asked me, hey, do you know of anybody stockpiling weapons or ammo?
11 And I'm, like, I'm in Texas, do you want to pick a door? Like should we just start
12 knocking? Do you want that street or that street? Like, I mean, there's a reason why
13 we have an ammo shortage.

14 And I'm like the only one, like, saying, somebody, like Feds, stop, and, States, stop,
15 stop hurting the people. Stop making yourself richer and worrying about your influence
16 on the global sphere and do something about the country, because this is what the
17 problem is, is there are people that are tired of their bullshit, right?

18 So Stewart is being, like, I'm looking at the narratives and the divide in the country
19 and the narratives that are being spun out by both sides of the media, and I'm looking at
20 where we're headed, and this looks like historically where we're headed. So I'm trying
21 to do something. Like, we've got to do something.

22 And, yes, you have use inflammatory terms to say, "Danger, Will Robinson," right?
23 But that doesn't mean I'm going go and, like, try and do something stupid at the Capitol.

24 I mean, shit, I would say this if I was sitting in front of the panel. If I was sitting
25 here a year now, watching all of these guys sitting in jail without bond, you know what I

1 would have said? Damn, you should have brought your fucking weapons. You're going
2 to get treated like the criminal you're not.

3 The truth is they left them on the other side for a reason. They had no desire to
4 do anything that they're being accused of, right? They were defensive in nature, and
5 that's what nobody wants to give them credit for. They were afraid. They were afraid
6 of our Federal Government. That's a fact.

7 Q Got it. I just want to ask about one more exhibit.

8 [REDACTED] can you pull up exhibit 6 and go to page 5?

9 And, Ms. SoRelle, this is one of the chats that you produced. I wanted to ask
10 about it.

11 A Okay.

12 Q [REDACTED], do you mind zooming in a little bit?

13 So this is a chat with Mr. Rhodes, an individual chat that you had with Mr. Rhodes.
14 So this is from December 28th, 2020.

15 Mr. Rhodes writes, "Trump is full of shit. He's not going to do a damn thing. I
16 need to make some decisions based on damn reality, not wishful thinking."

17 A Yeah, he's still not talking about doing anything violent. See, you got to
18 understand, we were working at the State level.

19 Q Oh, no, wait. I'm sorry, Ms. SoRelle. I'm sorry to cut you off. I wasn't
20 asking about anything violent related.

21 What was it that Trump was doing or not doing at that time that made Mr. Rhodes
22 have that reaction?

23 A He wanted them to invoke the Insurrection Act. It was the same thing.
24 Because he and I had realized that like we're not getting any traction anywhere, like we're
25 not -- like there's -- like we were hoping that a court would do something. So you've got

1 to look at the timing of the Texas case. You've got to look at the timing of a lot of stuff
2 that was going on outside of all of this.

3 Q What were the decisions that he wanted to make based on reality and not
4 wishful thinking?

5 A Dude, how many times do I have to tell you look at his own pattern? The
6 same with mine. I just told you the reason I started this in March of 2020 was to tell you
7 how quickly we understand our constitutional things.

8 We're not fucking retards, okay? Both of us are intellectuals. Both of us know
9 how to read a constitution. Both of us understand how this world works.

10 Your case of last resort was given to us by our Founding Fathers. It doesn't mean
11 get bloody. It means they will attack us because they don't want us using the power of
12 the people, right?

13 But the fact is he and I both are fully aware of how our constitutions work lock and
14 key. What you're not realizing here is the conversations where we spent hours going
15 through founding documents, where we looked at our State constitutions, where we sat
16 and went through all of the things around several States and how they formed them,
17 around the insurrection that occurred during the time that Texas is founding.

18 So, no, you're missing it because you're reading one little blurb and assuming you
19 understand what we're talking about, because you weren't there the day before when
20 he -- or 3 days before -- when he and I were fumbling through Texas' founding archives.

21 Q Ms. SoRelle, I understand that this is, you know, a taxing experience, having
22 this conversation for a really long time, and maybe you've talked about this -- these
23 subjects before, maybe ad nauseam.

24 A Yes.

25 Q I am really just trying to understand the context for these messages that you

1 produced to us. So --

2 A The constitution. Just go read your constitutions. That's the easiest
3 answer. He and I, everything we've ever discussed was constitutional based.

4 Q So were you and Stewart growing disillusioned with President Trump at this
5 point?

6 A We wanted to ensure that the mandates weren't going to occur, because the
7 reality is, is there was a playbook for all of this stuff. And it told us what they wanted
8 next, right? It's not rocket science. And what we understood was the only way we
9 defeated the lockdowns was going through our State levels. We understood that.

10 So we were hoping that it is easier to fight with Republicans than it is with the
11 Democrats in charge. And that's why it's funny that Stacey Abrams backfired on the
12 Republicans and why the Republicans were a little panicked after their little plan didn't
13 work out, is because the reality is, is it is easier to prevent what happened if you're
14 dealing with Republicans, because we can shame them easier.

15 So, yes, it was I don't want to have to go the hard route, which is going back to our
16 States, doing the same thing we did, and we're going have to figure out how to get over.
17 And what, unfortunately, happened is then the audit circuit came out, which was just as
18 bad as everything else.

19 And so what we didn't get to do really was actually do anything. Plus the 6th
20 happened. See at this point we didn't know the 6th was going happen. But how great
21 was the 6th was for them? Because what did it do? It rocked us. What did we do?
22 We went and cowered in a corner for 6 months.

23 Q In one of the other chats that you provided, someone named Don Siekerman
24 states that Stewart was working with the President to invoke the Insurrection Act.

25 I asked you this before but I just, given that chat, I wanted to ask again, was

1 Stewart talking to President Trump?

2 A No, he wasn't.

3 Q And who is Don Siekerman?

4 A One of the guys. He was the one that I think was supposed to be over the
5 January 6th rally actually that got sick. He was the one that was supposed to be the one
6 that was in charge of it.

7 But I don't know. I don't know and, I mean, I'll just -- I don't know what the
8 guy's -- I don't. I have no earthly idea why. But I don't have any reason to believe that
9 Stewart had any personal relationship with Donald Trump.

10 I mean, I had -- technically, I would have had closer as, like, avenues. Well, I
11 don't know. Marcia Strickler. But, I mean, it's the same thing, like, because she did
12 actually go to, like, the D.C. Christmas stuff. And that's why he asked her to take it.
13 But she didn't take it.

14 And I was at least still communicating with them over affidavits and still talking to
15 several of the things. So, like, I mean, I don't know.

16 Q Got it.

17 A I'm griping at them, too.

18 BY [REDACTED]:

19 Q Real quick, before, I know what you're about to say, [REDACTED].

20 Real quick, you mentioned Christmas stuff and White House visits. Do you
21 remember Ms. Gracia talking about a White House visit in December?

22 A So, ironically, they thought it was funny. No, they have no access to
23 Trump.

24 Q Okay.

25 A They never had access to Trump. But they were actually sent to go do that.

1 Q Sent to go do what?

2 A To go have that meeting, like, to go do the tour at the White House.

3 Q Do you know --

4 A The same reason Bianca wants me to make sure to get security detail of
5 Stewart off of her now. There's a lot of weird shit going on over there. I have no
6 earthly idea. And I told her I wasn't going to lie for her.

7 Q Do you know who arranged the White House tour for Ms. Gracia and
8 Mr. Tarrío?

9 A I have no earthly idea, but I know she was sent on that mission.

10 Q Sent on the mission. I guess I -- okay. She was sent on a mission by
11 whom?

12 A Well, so that's where it gets into who Red Team is, right?

13 [REDACTED] Okay. Got it. So I think we're good then.

14 [REDACTED], do you think we're still good to go on a break? You're good?

15 [REDACTED]. Yeah. Do you want to --

16 Ms. SoRelle. I'm sorry, by the way. I'm sorry for yelling at you.

17 [REDACTED] Let's take a quick break and come back at 3:45 p.m. eastern time.

18 [REDACTED]. No worries, Ms. SoRelle.

19 Ms. SoRelle. I'm not a criminal.

20 [REDACTED]. We'll go off the record at 3:38 p.m.

21 [Recess.]

22 [REDACTED]. We'll try to keep it moving.

23 So we'll go back on the record at 3:46 p.m. eastern time.

24 BY [REDACTED]:

25 Q You mentioned Mr. Jason Sullivan earlier.

1 Do you recall -- and there's been reporting on this recently -- but do you recall a
2 December 30th dial-in meeting where Mr. Sullivan was speaking about plans for
3 January 6th?

4 A I wasn't a part of that, but I'm aware of it.

5 Q Okay. How did you become aware of it? Through reporting or through
6 Ms. Burk?

7 A Through Ms. Burk. And then I actually recall talking to -- I don't -- I can't
8 remember if it was Josh James or -- we knew that, like -- and I don't know -- or maybe it
9 was, like, Bianca or something, because it was one of those "are you invited" or "are you
10 participating in" kind of thing.

11 And I didn't know what that was, and I still didn't know what was at the time.
12 Like, I was, like, I don't know what you're talking about.

13 And then, like, later, when she's talking about it, I was kind of, like, thinking back.
14 And I was, like, I do recall a reference to them having, like, some kind of organizational
15 meeting, but I wasn't attending it.

16 Q So based upon what you remember, Ms. Gracia or Mr. Josh James, one of
17 them had attended that meeting and had talked to you about it around the time?

18 A Or it was more of, like, a reference, are you attending that?

19 Q Are you attending it? And in the reporting --

20 A And I don't know who did or didn't. I'm sorry.

21 Q Oh, no. In the reporting it appears that a medical group of some sort, is
22 what Mr. Sullivan says, organized the call. I'm assuming it's kind of like the medical
23 freedom folks that you were referencing throughout the deposition today?

24 A Correct.

25 Q Okay. So you've mentioned Stop the Steal rallies as kind of like an ongoing

1 theme from the election all the way through January 6th. And just to make sure we're
2 confirming, it's the same organizers from these rallies that are now planning January 6th?
3 Is that your recollection?

4 A Yes, it is.

5 Q And you became aware of these events when Mr. Alexander told
6 Mr. Rhodes, right?

7 A So I'm actually -- like some of them would pop up in, like, my FOS or
8 whatever. So, I mean, I saw them, but then I know the communication, because I wasn't
9 part of like -- so there was, like, a separate -- like when there were actually organizing
10 one, there would be like an organizational one that was put together by, like, Ali or Stone
11 and -- I don't know. It wasn't Stone. But, like, 1AP, right?

12 Q Uh-huh.

13 A So they would have, like, their organizational one. I was never on that. I
14 know Bianca was. I think Marsha -- I know Marsha Lessard was because she was kind of
15 telling me -- like she was giving me details one time when she called, you know, like it
16 looks like it's going to be like this or whatever.

17 And then I know Bianca was upset because when Ali wanted them to consolidate
18 their stages, then she was upset because she basically was, like, I've sunk all this money
19 into this and I'm not going to go, you know, just because Ali wants to.

20 So I know there was, like, friction especially prior to the January 6th one over the
21 organizational part because I was talking to the ladies.

22 Q So that's a good point. So I've wondered that, why the Latinos for Trump
23 and the Virginia Freedom Keepers, so you had Ms. Gracia and Ms. Lessard, sharing an
24 event. That was driven by Mr. Ali Alexander?

25 A No. So they had actually just decided to do it on their own, and then Ali

1 tried to talk them out of it and to merge into theirs.

2 Q Oh, and to merge into the actual Stop the Steal event at the Capitol?

3 A Correct.

4 Q Okay.

5 A And so I know there was friction over that because Bianca had already put
6 down -- I don't know how much money she ended up paying, like \$8,000 or something.
7 I don't know. And then Marcia had paid her portion of it, and they were going to split it
8 for the day or whatever.

9 But I remember talking to both of them around that timeframe, and they were
10 both irritated with Ali over that.

11 Q But they didn't end up merging their event with Mr. Alexander, correct?

12 A No, they stayed independent and over on section 7 or whatever that was,
13 that section on the other side.

14 Q Okay. But there was communications between Mr. Alexander organizing
15 his event and Ms. Gracia and Ms. Lessard organizing their separate event on the Capitol?

16 A Yes.

17 Q Okay.

18 A There was communication between them, and he was frustrated. My
19 understanding is he was frustrated because they were doing their own thing in, like, that
20 7 area, the section 7 and he was wanting them to bring their stuff over to 8.

21 Q Almost to consolidate the crowd and attendees? Is that what
22 Mr. Alexander was trying to do?

23 A That's what they think he was trying to do. And that was at the time.
24 They're, like, basically like, no, we're doing our own thing.

25 Q Do you recall a Mr. Stephen Brown? Do you know Mr. Stephen Brown

1 from Florida?

2 A No, I do not.

1

2 [3:51 p.m.]

3

BY [REDACTED]

4

Q Okay. So you don't remember or recall Mr. Steven Brown sending the Florida Oath Keeper names to Mr. Alexander for his protection detail?

5

A Oh. Is this, like, part of, like, their, like, the organizational's -- okay. So, if you're asking how that stuff was occurring, yes, he was saying, here are the ones that have agreed, or, you know, this is the chapter, this is who's going to be using to be -- they were trying to organize who was what detail and who was with whom.

6

Q Right. And the details were for Mr. Ali Alexander and the Stop the Steal, I'll say, "influencers" for Mr. Roger Stone, correct? And then for, like, you and Ms. Gracia and those individuals at that stage, are those kind of the three pockets of security details that happened on January 6th?

7

A That's correct. And that's what they were trying to do, was just organize, this is the group that's gonna be here, this is the group that's gonna be there, and this is the group that's gonna be at this other one.

8

Q And just to make sure we're tracking it right, the security request -- for you and Ms. Gracia, I'm assuming you all just went to Mr. Rhodes and said, we'd like Oath Keeper security for January 6th. Is that fair?

9

A I actually had nothing to do with any of that.

10

Q Okay. But for Mr. Ali Alexander and Mr. Stone, how did their requests come in for January 6th?

11

A That would've been in that group chat that I'm not associated with.

12

Q Which group chat was that?

13

A So this is where -- this is what I was telling you earlier. Like, every rally that

1 they had, there would be created by 1AP or Ali a rally influencer grouping with -- and it
2 was generally with the name of the event at the top or the location. So it'd be, like, Stop
3 the Steal, D.C., whatever, January 6th, or whatever it is. I'm not 100 percent sure on the
4 name, but it would be indicative of where it was and date.

5 And then, in that, they would basically say, here's what we've got, here's who we
6 need, speakers, you know, we need speakers, who wants to be a speaker, who wants to
7 be part of X, who wants to be part of Y -- you know, that kind of thing. Right? Who
8 can do security or can -- and they would ask, right, certain groups, can you do this
9 because we don't have coverage for this.

10 This is my understanding of how it operated, just off my recollection of having
11 reviewed them historically.

12 And so that's what it looks like, is that it is an open group chat. They would add
13 them all in there. And then it would just start popping up: This is what we're doing,
14 this is who's going to be there, and this is who we would like to attend, right, or here's
15 who we would like, whatever, you know, if you want a medical freedom group, if you
16 want whatever. And then they would start orchestrating from there. And they would
17 say what they needed for security details, and everybody would kind of pipe in, and that's
18 how it -- that's how it worked.

19 Q Okay.

20 Does the January 6th VIP Signal chat, does that sound familiar as maybe, like, the
21 type of group where this type of security would be coordinated through?

22 A Yes. And that one would've been probably, I'm assuming, at the Ellipse.
23 Because I know that the Florida chapter was in the VIP section. Because that was part of
24 the issues that popped up with why Stewart told them to go gray man and they all took
25 their gear because Ali overrode them the night before, on the 5th.

1 Q Do you recall the Florida chapter being asked by Mr. Ali Alexander to provide
2 protection for politicians on January 6th?

3 A Correct. And that was my understanding, was that basically Florida was
4 going to be bringing some, like, politicians -- I don't -- my understanding was it was, like,
5 State-level political figures, right? It was, like, State house or State senate or
6 whatever -- and that they were going to be going up there and that they needed a larger
7 group from Oath Keepers, which is why they moved all of the Florida chapter over to Ali's
8 group and why they had kind of the rag-tag group that they ended up putting together for
9 Roger Stone.

10 Q What was the -- do you remember any of the State legislators that the Oath
11 Keepers were supposed to be providing protection for?

12 A They never said names. They just said that they were State officials and
13 they were State politicians. And nobody could ever get that, nobody could ever
14 ascertain that, nobody had a clue.

15 Q And this was coming from Mr. Ali Alexander, right?

16 A Correct.

17 Q Okay. And Mr. Stephen Brown, where did he fit in with this again?

18 A I really don't know.

19 Q Okay.

20 A I don't know if that was just somebody Stewart said, can you help me
21 organize this, or whatever. That could've just been somebody who Stewart was
22 communicating with on the side, saying -- like, he was like, "I can help. What do you
23 need help with?"

24 Q Okay.

25 And in the same -- in one of the chats that you produced to us -- I believe it's the

1 "DC OP Jan 6" chat that you produced to us --

2 A Yes.

3 Q -- we see a message from OK Gator 1, who we understand is Kelly Meggs.
4 And he says, "This isn't a rah-rah Trump crowd coming, and that may be their biggest
5 miscalculation."

6 I guess, what was it -- do you know -- and if you don't know, it's fine -- but do you
7 know what he was talking about with that message into the chat?

8 A So you have to look at it from -- this is why I said I wanted the Insurrection
9 Act, okay? I was watching the people -- and I mean this on Facebook, I mean this on
10 Twitter, I mean this on those group chats, I mean this in public in general, right? -- getting
11 more and more frustrated with the fact that everything was getting dismissed from court
12 and the courts weren't hearing it.

13 And I knew it was all lies. I was already telling people that would listen: It's
14 okay. They're full of crap. Like, don't worry about it. But I could still -- and it's hard
15 because everybody -- because she was flashed up on the screen, and, like, you know,
16 Rudy Giuliani and Sidney are, like, you know, America's, like, gonna save the day, and I
17 knew they were full of crap -- it was hard to deal with -- it was like watching the
18 trainwreck.

19 And this is why I was saying it was getting more frustrating for me, because I was
20 realizing we're getting into dangerous territory here, because they're lying, the truth is
21 not being discussed, and we have a problem because the people are getting mad at the
22 system, when they're the ones doing the bad job.

23 Q Right.

24 A Does that make sense?

25 Q Yup. Okay.

1 And, similarly -- and this might be a similar answer -- in a message from Mr.
2 Rhodes, he -- and I think this is -- but I'm just going to ask the question. He says that he
3 wants former President Trump to take off regular gloves and start kicking ass. And this
4 is not about Congress; January 6th is not about Congress.

5 I guess, what is he saying with this statement, or what did you take it to mean?
6 And I think this is what you were talking about with Mr. Prasanna before the break, but I
7 just want to confirm.

8 A I am assuming he's saying he wants him to invoke the Insurrection Act, and
9 let's get some pause, let's get some space in here, let's see what's going on, somebody
10 get to the truth.

11 Because Stewart knew that that was the problem. Stewart, unfortunately, was
12 the one that I was, like, bitching to about the fact that none of this was right. Like,
13 everything that was happening was setting up -- in my mind, I thought it was setting up
14 the patriots. And that's why it's like -- in a weird way, it was like he and I could see the
15 powder keg. You know what I mean?

16 Q Uh-huh.

17 A And it was frustrating. And he's like, somebody's gotta do something.

18 So y'all take it as he's being an aggressor. I know that he's being more like,
19 somebody's gotta do something because this is just getting uglier and uglier and uglier
20 and this is where we're gonna head if somebody doesn't do something. Like, if
21 somebody doesn't put this together properly, we're gonna end up in a bad spot.

22 Well, so, I mean, in that case, you could say the 6th was kind of a blessing, right,
23 because even though these guys got accused of doing everything, it did send everybody
24 back and pause everything, right?

25 But they didn't orchestrate it, they didn't do it, they didn't set any of that shit in

1 motion. Because Stewart and I actually were wanting to sit and watch Congress and
2 hope that they were actually going to have hearings on the issues, the real issues, that
3 were occurring in the States and not what was being portrayed by the media or by Sidney
4 Powell.

5 Q And when Mr. Rhodes said, "They won't fear us until we come with rifles in
6 hand," again, you've explained it, but I just want to make sure we're understanding what
7 you took that to mean by Mr. Rhodes saying that.

8 A Yeah, that's him just being stupid. I mean, I don't know why he said that.

9 Q No, that's fair. That's fair.

10 So, going back to the timeline leading up to January 6th, on December 30th, the
11 DOJ outlined how Mr. Rhodes purchased two sets of night-vision devices and one weapon
12 sight and had them shipped to Virginia.

13 He shipped them to Ms. Lessard, correct?

14 A Correct.

15 Q And what was -- I guess, what were these night-vision devices and one
16 weapon sight, what was that for, if you know?

17 A I have no clue. Because I'm telling you, these guys really thought -- and it's
18 funny, I should send you the article that the guy, the war correspondent, just wrote on
19 them. Like, they really thought they were going to have to be extracting people from
20 D.C. I'm not saying that that was right. I'm not saying --

21 Q Right. But that's what they were thinking leading into January 6th. And
22 you're not --

23 A Right.

24 Q Okay.

25 A And I didn't know he had purchased them, just for the record. I know he

1 had to pick up something from Marsha Lessard. I did hear that. But I was not around
2 when he was purchasing that stuff.

3 That's why I'm saying, I don't know what all Stewart was thinking. I wish I had
4 gone into, like, more of his conversations with Alex Jones and them, in hindsight, before
5 his phone was taken and all of that stuff. I mean, I really don't know.

6 But, from what I was hearing and stuff like that, it was just a lot of, like, if they're
7 lying to us, if they're just, you know, manipulating us, if they're just, you know, playing
8 hide and seek, what else are they willing to do to us?

9 Which, ironically, is a very good question that -- yeah, he's right. Like, look at the
10 6th. And that's the --

11 Q Right.

12 A That's the funny part about it, is, like, they just did it differently, you know?

13 Q Yeah.

14 And just to -- we've talked about the event between the Virginia Freedom Keepers
15 and Latinos for Trump, but I'm bringing it up because we just asked about Ms. Lessard.
16 But you had -- did you have any planning involvement in that event, or were you just a
17 speaker for the event?

18 A I was just -- actually, I wasn't even -- I didn't really necessarily even want to
19 speak. She was just kind of, like, forcing me up there.

20 And it was a trainwreck, because the GPS was off, we were late, their stage tech
21 was late, everything was off, everything was messed up. And you had -- like, we literally
22 walked to the Capitol twice almost before we realized it was the other side because our
23 mapping was off. So we went one way, and then we were like, okay, we'll go this way,
24 and then we took the, like, wrong street up, because everything kept redirecting us to the
25 Capitol. And it was like, okay, we can't get there.

1 So, by the time we get there, the stage is just getting set up, like, everything's a
2 catastrophe. And, yeah, it was fun times. And so, yeah, it was a mess.

3 But that was the plan, was that I was actually going to meet Bianca. I was going
4 to meet -- she was doing her event. I'd been invited to that the same way
5 Stewart -- they had done their usual group chat stuff. It was no different than any other
6 rally, as far as my understanding of the communications. And it was literally just the last
7 of the Stop the Steal series, was my understanding.

8 Q Okay. And were you aware of Ms. Gracia or Ms. Lessard coordinating any
9 congressional Members to speak at this event?

10 A Not that I'm aware of.

11 Q Okay.

12 So, now -- that was December 30th. We're now moving on to January 1st and
13 2nd.

14 The DOJ indictment outlines how Mr. Rhodes bought approximately \$5,000 in
15 firearms between these 2 days. Do you remember these purchases in Texas?

16 A Okay. So here's the thing. There's two parts of this, okay? It says
17 firearms, but if you -- and I don't have his phone, but somebody else pointed out -- it was
18 another attorney -- I think it says armaments?

19 Q Yeah, I mean, it says shotgun, scope, magazine, sights, optics, a bipod, a
20 mount, a case of ammunition, gun cleaning supplies. So it's a range of things.

21 A Yeah. And then I think there's, like, a generic reference in there too
22 somewhere.

23 Q Uh-huh.

24 A And so I know they were coordinating who needs what for other stuff. And
25 it's like -- another attorney pointed out to me; they're like, Kellye, there's nothing wrong

1 with that, and if you buy a decent rifle -- and I know Stewart had a couple of decent
2 rifles -- those were, like, \$1,800 to \$2,500 apiece. You know what I'm saying?

3 Q Right.

4 A The thing is, like, so they -- the FBI was like, well, did you see all this stuff?
5 It's like, dude, the guy was living in his car, you know? I mean, what the heck. Like,
6 everything was always in his vehicle. So I couldn't have told you what was in there. I
7 mean, yeah, there was a couple of long cases, but they were always in there. You know
8 what I mean?

9 Q Right.

10 A So it was like, he'd take them out, like, if he stayed somewhere or
11 something, but, I mean, it was like -- there was nothing that was a red flag to me, really.

12 And I didn't go into the -- I know he went to go buy some scopes. I know he was
13 in there for a while. I ran to the store. Like, I didn't -- I went into the little women's
14 shop to the left. Like, I mean, I wasn't -- I wasn't -- nothing was, like, where I thought it
15 was anything other than what all of them had been; like, we've got defensive postures.
16 Like, they --

17 Q Okay.

18 A Look, the question is, did they for November have shit with them? Yes.
19 Did they for December? Yes. Did they in Atlanta? Yes. Did they have anything
20 different in January than they had in the other two rallies? No, they didn't. They all
21 had the same shit.

22 Q Okay. So you don't explicitly remember, like, this purchase on January 1st
23 and 2nd?

24 A No, I don't. But I wasn't --

25 Q You weren't really paying attention for it. Is that fair?

1 A I wasn't even with him for a couple of those days.

2 Q All right. Yeah, it was right after the New Year. Okay.

3 A Yeah. That's why I was gonna -- I wasn't with him until we started
4 traveling, which I think was the 3rd.

5 Q Okay.

6 So -- but you said that Mr. Rhodes was living out of his car. So everything he had
7 was in his car. And this is the same car that you all used to take to come to D.C.?

8 A So he actually had a rental car, but it was the same M.O. for him, like,
9 because we had rental cars before, right? But he had, like -- was living out of his car.
10 So if he was moving -- even if he was like, I'm gonna use a rental car to go to wherever, he
11 would still load his stuff from his other car into the rental car. Does this make sense?

12 Q Yeah.

13 A And it was like, he looked like he was constantly moving anyway. Like,
14 every vehicle you were ever in with him was always full of his suitcases and his shit. You
15 know, he had a storage unit for some bigger stuff, but his other stuff -- like, I mean, there
16 was just always shit in there.

17 So you -- like, unless -- I mean, it's not like you opened the car and looked back
18 there and there was, like, oh, guns and shit laying around there. No, it wasn't like that
19 at all.

20 Q Okay.

21 I believe [REDACTED] might've had a question, if he's on.

22 [REDACTED]. Thanks, [REDACTED]

23 BY [REDACTED]:

24 Q Ms. SoRelle, there was reporting earlier this year that on January 3rd there
25 was a meeting in Pennsylvania, in Lancaster County, of Oath Keepers -- on January 3rd, so

1 a couple of days before January 6th. Are you familiar with that meeting?

2 A I am, but I don't know what they specifically addressed or they discussed. I
3 know that it was actually numerous militias from the Northeast. And I know Stewart
4 was invited to that but Stewart did not attend that.

5 And I do know that they were -- I mean, I don't know how many different groups
6 were involved, but I know that they -- I know that existed, and I know Stewart got the
7 invite for it, because he was debating -- because I had -- he had specifically said, look, I've
8 been invited to this stuff in Pennsylvania. I was like, that's fine. I wasn't gonna fly at
9 that point; I knew I wasn't going to. And I was like, that's okay, I can take my car, I can
10 drive, it's not that big of a deal.

11 But, I mean, they made us terrorists, you realize, when I was challenging the
12 election, right? Like, just anything I did at the beginning automatically had -- like, I had
13 FISAs on me by November 6th, I'm pretty positive, because I was on the dashboard at that
14 point.

15 So I know that I wasn't even going to mess with flights. Like, I had already
16 decided I'm not even going to mess with flights, because it's not worth having to go
17 4 hours early to go through for whatever the -- quad S or whatever security for it.

18 And that was made abundantly clear by a couple of people who tried to fly who
19 had just been part of the groups that I had been a part of. And so we were already
20 terrorists by, like, November 6th.

21 So Stewart opted not to go to Pennsylvania because he didn't think that it was
22 probably -- he was like, I don't really think that that's great, for you to drive from Texas to
23 D.C. by yourself. And none of us wanted to fly, because everybody was being harassed.

24 Q Got it.

25 And did you know Jim Breheny or James Breheny?

1 A No.

2 Q Okay. He's the one, according to reporting, who invited Stewart to that
3 meeting. Does that ring a bell?

4 A I wasn't associated with that. But I know he was invited to Pennsylvania,
5 because he did talk to me about it. And I was like -- I mean, it was just one of those
6 where he was like, no, I'm not gonna make you drive all the way to D.C. by yourself.

7 Q Got it. So did you ever get a readout of what that meeting was about?

8 A I have no earthly idea, but I know that 1AP has been pegged -- so there, for a
9 while, media and, like, the Capitol Terrorist Exposers and the FBI asked me about a photo
10 at the Iwo Jima monument, and that's actually 1AP, right, but nobody could figure that
11 out for a really long time.

12 So the point is, everybody's, like, homed in on Oath Keepers, but y'all should
13 probably know there was probably about 35 QRFs outside of D.C. that day. That's the
14 truth.

15 Q Do you know who --

16 A And it was not offensive -- it was never offensive in nature, just for the
17 record.

18 Q Do you know who had those QRFs? Any of the groups?

19 A It's regular Americans, sir. This is why --

20 Q Were they affil- --

21 A This is why I'm telling you we have a problem in this country, right, and the
22 government needs to make some -- needs to assist us in resolving these problems, not do
23 what y'all are doing right now.

24 [REDACTED]: We're just trying to understand -- and this is why we're happy
25 we're deposing you. We're trying to understand the facts, Ms. SoRelle.

1 The Witness. I know, but I'm just trying to tell you, I am sitting on the side of the
2 people and I understand how frustrated the people are.

3 [REDACTED]. I understand.

4 [REDACTED], I'll give it back to you.

5 [REDACTED]. Okay.

6 BY [REDACTED]:

7 Q So let's -- we've moving through. We're on January 3rd now. That's the
8 day that you and Mr. Rhodes left Granbury, Texas, correct?

9 A Correct.

10 Q And, according to the DOJ, that's when Mr. Rhodes stopped and spent
11 approximately \$6,000 on an AR-platform rifle and firearms equipment, and it included
12 sights, mounts, triggers, slings, attachments.

13 Do you remember this purchase at all?

14 A That's the one that I was telling you -- so the first two days, when you were
15 talking about January 1st and 2nd or whatever, I was not associated with that.

16 Q Okay.

17 A The one in Mississippi was the one where -- we got to Mississippi. He was
18 supposed to be meeting with a guy from the Mississippi chapter who was either gonna
19 travel with us or was gonna carpool with us. I don't remember his name, but it's the
20 same guy he had stayed with historically. I think it's Jim maybe.

21 So we sat at that restaurant for, like, over an hour waiting on him. And then
22 Stewart's like, eh, let's just go to the gun store, and I was like, fine, whatever, while we're
23 waiting on Jim --

24 Q This is the purchase in Meridian, Mississippi, correct?

25 A Correct. This is in Meridian, Mississippi. So we went --

1 Q But you don't remember where the purchases were in Texas? You don't
2 remember where that stop was?

3 A I wasn't a part of that.

4 Q Oh, okay. On January 3rd -- so this was before he picked you up on January
5 3rd.

6 A So he bought stuff on January 3rd?

7 Q Yes. And then the Meridian, Mississippi, was on January 4th.

8 A I'm trying to think. Did we leave on the --

9 Q You left on the 4th, and then you arrived -- you got to Mississippi on the 4th,
10 and then you arrived in D.C. on the 5th.

11 A I don't know. I was not a part -- I cannot think of stopping anywhere in
12 Texas on the way out. Was it in, like, Dallas? Do you know where it was at?

13 Q No. That's why we're asking you, do you know where the stop would've
14 been or where you might've stopped on the way to Mississippi in Texas.

15 A I have no earthly idea. I remember the Mississippi stop because we were
16 there for a few hours.

17 Q Right. And then, when we talked last time, remember, we talked about the
18 Mississippi stop, and you told us how you stopped in Meridian and --

19 A Yes.

20 Q -- were supposed to meet with the individual. And then that's when Mr.
21 Rhodes went to the firearms store, to -- I think you called it, like, the -- I think it was, like,
22 a gaming and sports store. Is that correct?

23 A Yeah, because it was like -- because I walked in just briefly, like, at the very
24 end, and there was, like, actually clothing and stuff, like, right when you first walked in.

25 And so he was over checking out. I wasn't really paying attention. I didn't find

1 out until later he had shipped something, because he was talking to Marsha Lessard. It
2 was about the same time that I was talking to him about Enrique getting arrested.

3 Q Uh-huh.

4 A And that was when he was explaining to her that, like, just bring it to the
5 whatever event. Yeah. He was telling her just to bring it to the event, like, on the 6th.
6 So, like, you know --

7 Q That was what was in the gray bag? We saw messages of Mr. Rhodes
8 telling Oath Keepers to go get his bag from under the stage. Is that what it was?

9 A No. Because I think he ends up getting it from Bianca, because I think they
10 end up -- because he's, like, telling her, just bring it to the stage. Maybe. Shoot, I don't
11 know.

12 Q Okay. No, that's okay. If you don't know, that's fair as well.

13 What was Mr. --

14 A I really don't know.

15 Q What was Mr. Rhodes's reaction to Mr. Tarrío being arrested?

16 A It was the same for everybody. Like, okay, what happened? He had
17 magazines. It was like, oh, what a dumbass.

18 And then they're like, Kellye, can you find him and get him an attorney or help us
19 start finding attorneys? And so that's what I did. I started calling jails, trying to find
20 out where he was incarcerated, and then called and got a couple of attorneys' numbers.
21 I talked to -- we talked to Bill Olson and then the guy -- William something.

22 Anyway, so I get a couple numbers of defense attorneys. And then that sets the
23 stage for the garage, by the way.

24 Q Right. And we'll get to that.

25 I guess, looking back on it, do you have any new thoughts about Mr. Tarrío being

1 arrested on January 4th?

2 A I think it was all crap. I do. Because that charge never goes anywhere,
3 and he ends up only pleading out on the -- they dismissed the magazine charges, and he
4 ends up pleading out and does, what, a couple months in the D.C. jail for burning
5 somebody else's BLM flag?

6 Q Uh-huh.

7 A I mean, I don't know. It's all really weird. But I think it was a very
8 convenient way to get Enrique out of there for the 6th.

9 Q Understandable. And do you think it was part of his thought process to get
10 out of D.C. for the 6th?

11 A Yup.

12 Q Okay.

13 A Because I think he had to make the show, right? I think he had to appear in
14 the D.C. And then they had to have the wonky little garage thing, right? But then
15 Enrique bailed out. It's just so conveniently scripted, in hindsight. Oh, my gosh.

16 Q So when you all arrived in the D.C. area, you stayed at the Hilton Garden Inn
17 in Vienna again?

18 A Yup.

19 Q And Whip was with you all in that hotel?

20 A Yup.

21 Q And there were a few other Oath Keepers that stayed with you all in the
22 Hilton Garden in Vienna?

23 A There was a ton of Oath Keepers in there.

24 Q Okay. And there was also quite a few in the Comfort Inn in Ballston,
25 Virginia, correct?

1 A Correct. That was --

2 Q Were you all -- what was that for?

3 A That was the Florida chapter in the Ballston inn.

4 Q Okay.

5 A And some of the other stragglers, I think. Like, I think Watkins and them
6 were all over there.

7 Q Is it also -- were you tracking, like -- so you mentioned the Florida-North
8 Carolina relationship before. The North Carolina chapter, were they at the Ballston
9 Comfort Inn, to your knowledge?

10 A I think only one was. And I think he stayed. But he was the one that was
11 driving their -- their "armaments" from North Carolina.

12 And that's where the story gets off for the DOJ pretty badly. So there are some
13 investigative journalists that have broken that down really great at this point. But, I
14 mean, basically, there's another guy that they don't acknowledge that's in there. And
15 that guy is the one that's, like, really in bad shape, and he's the one that's babysitting the
16 stuff.

17 And there's a ton of people in and out of there. So it's funny, because they're
18 like, "all these weapons," "look at all these weapons cases" for, like, a ton of people.
19 You know? So, like, if you zoom out and look at how many Oath Keepers were in D.C. on
20 the 6th versus how many gun cases there are, it really is not that many. I know that
21 sounds like a weird conversation to have, but -- yeah.

22 But, yeah, that was the ones that were traveling up from -- those were kind of,
23 like, the break-off groups that were at the Ballston inn.

24 Q Okay. But you were -- Mr. Rhodes was aware that that was where the QRF
25 was being staged, was at the Ballston Comfort Inn?

1 A Yeah, see, define "QRF." See, this is where it gets weird for everybody, is
2 because it's not possible.

3 Q Help me understand that.

4 A So the guy who actually has the guns in the Ballston inn can barely walk.
5 He just --

6 Q Is this Mr. Stamey (ph)?

7 A It's not Mr. Stamey (ph). This is the thing; they've screwed up the facts,
8 and they've done it on purpose to create --

9 Q Who is the guy?

10 A Shoot. It's in the article. He ends up getting -- I give him -- we end up
11 figuring out who the guy is.

12 Q Was Mr. Kwiatkowski with the weapons in Ballston?

13 A Nope. There's another one. See, this is what I'm saying. They're
14 shortchanging how many people were in the Ballston.

15 Q Oh, please, just tell us who it is then. We're -- I'm curious to hear who it is.
16 Mr. Earp? Randy Earp? E-a-r-p.

17 A Hold on, hold on, hold on. I've gotta get to the email.

18 Shoot, where is it? There it is.

19 Because I spent, like, probably 20 hours going over all of the details with this guy
20 trying to figure -- we were piecing everything together. That's how we knew -- they had
21 problems with the -- "their narrative is gonna crumble in this if the defense does their
22 job." Because he's identified more people. So it looks less -- it looks less and less
23 scary.

24 It is -- and it's relevant that I come up with this guy because you need to know his
25 name.

1 Oh, where is he?

2 I'm sorry.

3 Q No worries.

4 A I have to go through -- it's a very lengthy article. He's got, like, a three-part
5 series going, and this one is, like, already huge.

6 And he's got all the docs so it's kind of funny, actually. This dude, like, did a great
7 job imploding it.

8 There's Hadzy (ph). Moerschel maybe?

9 Q Moerschel? Or --

10 A M-o-e-r-c-h-e-l.

11 Q Okay. That's who was in the Ballston Comfort Inn?

12 A Hold on just a second. "With Kane at the QRF." "Moerschel is seen on
13 hotel surveillance" -- no, it was not him. That's the wrong one.

14 Q Yeah. He was at the Capitol.

15 A Bittner? Nope, we've got Bittner. Hold on.

16 There's unidentified people that he ends up getting videotape of. I don't know
17 who leaked their discovery, but it's quite cute.

18 Shoot.

19 Is it -- do you have a Bittner?

20 Q Mr. Ken Bittner?

21 I guess, what are you reading from? Can you send us this?

22 A Yeah. I think it's --

23 Q Okay.

24 A So, anyway, what he started figuring out is -- yes, it's Bittner.

25 So what he started figuring out is that they're kind of misdirecting stuff because of

1 the possibility of certain things happening, right? And so he started working to kind of,
2 like -- he started looking at the narrative, and he's like, huh-uh. And so he's writing,
3 like -- he's going through everybody's shit and blowing it up.

4 Q Okay.

5 A And I appreciate it, actually, because, I mean, look, they're stupid, they're
6 idiots, I give you that, but they're not bad people, and they weren't doing -- they weren't
7 planning on doing anything wrong. They were afraid. They were --

8 Q Was Mr. Vallejo from Arizona, was he in the QRF?

9 A See, I don't -- Ed was, like, a straggler kind of thing. Like, everybody's trying
10 to make this out bigger than it was. Like, they really didn't have one. This is the funny
11 part. Like, they have their guns. But some of that, if you look at the history before
12 that, it doesn't make sense, their QRF, like, stuff. I mean, like, there's different logic.
13 Like, they have more stuff coming with them than they should have because they were
14 anticipating on doing something that they didn't do. And --

15 Q What were they anticipating on doing? I heard you say --

16 A It was just that --

17 Q -- from D.C., but what were they anticipating doing?

18 A No, no, no. So a lot of them had extra gear and stuff with them because
19 they were supposed to be doing, like, range work at Doug Smith's place in North Carolina,
20 right, when they spent the night there. But they got there late.

21 Q That was the Florida chapter, correct?

22 A Yeah. So they're carrying a lot more stuff into the hotel than they probably
23 would have.

24 And then you've got Jeremy Brown that's a little bit worse than what he should've
25 been.

1 So, like, basically, they're trying to spread out a bunch of stuff that doesn't really
2 apply. And they know that. And that's kind of the point.

3 So I'm sending you the -- I'm sending you his article.

4 Q We got it.

5 A Y'all should read it. He's done a great job. He has actually introduced me
6 to stuff that I wasn't even looking at.

7 Q Thank you.

8 A And he's a former war correspondent guy, so he understands their
9 mentality, you know?

10 Q Oh, looks like we need access. We can talk about that later, though,
11 getting access to the article. So we'll talk about it later.

12 I guess, though, help us understand why weapons were being stored at the
13 Ballston inn, or the Ballston Comfort Inn.

14 A So that was -- so you've got first -- first strike against them was they were
15 supposed to be going to Doug Smith's. Everybody is on the same page on this; this isn't
16 even a question. They were supposed to leave Florida, get to Doug Smith's, and then
17 Doug was supposed to set up a, I don't know, like, a range, like, a training kind of thing,
18 like, just a -- like, they were gonna go shoot like guys -- like these guys do, not all guys, but
19 these guys do. And that didn't happen. They got there late. Everything was
20 discombobulated.

21 And they all have the same -- they're all very consistent on this, that, like, they feel
22 like in hindsight it was kind of like a crap thing, because in some ways they -- this is where
23 they get a little mad at Kelly Meggs, because they have this agenda and then Kelly Meggs
24 kind of implodes the agenda. Right?

25 And so they get to Doug Smith's. It's too late to do anything. They do other

1 stuff. But yet they're still loaded to bear, right? Like, they've got all these guns,
2 they've got ammo, they've got helmets, they've got, like, you know -- they've got their
3 range ammo, you know, what they would've used for the range.

4 And so, like, the guys are like, well, what the hell? Now we're carrying in, like,
5 shit-tons of guns and ammo. Not that they wouldn't have had their guns, but they
6 wouldn't have looked as bad if they had expended the shells. You know what I mean?

7 And so, like -- and all of them are consistent on that. And my understanding is,
8 that is consistent in their communications with Doug on that side. Right?

9 Q Okay. Yup.

10 So, moving past the QRF, the Ballston Comfort Inn, January 5th appears the first
11 day that you go to events and stuff in D.C. Is that correct?

12 A Correct.

13 Q I guess, what's the first event you go to on January 5th?

14 A So we get to D.C. It's right before dark. And we walk over to the Freedom
15 Plaza. We park in a parking garage in -- I don't know.

16 And we get to the Freedom Plaza. They've got all the speakers going. There's
17 Ali. There's, like, Oath Keepers there. There's, like, some Alex Jones people there.
18 Oath Keepers was doing security for that. I see some Proud Boy guys there, though,
19 because you can -- there's just a small distinction between them. And, I mean, that's
20 pretty much it.

21 I end up taking a call from Bianca, so I step away from the group. They've got,
22 like, a whole stage thing going. Tons of people there. And that was pretty much it. I
23 was just over there for maybe 30 minutes.

24 And then Bianca calls for me to come over to the Phoenix to get our press
25 credentials or, you know, like, our speaker pass or whatever the hell it was, the little

1 badge thing there, for her stage.

2 And so I actually tell Stewart that I'm going to go over there -- I go back to find
3 Stewart and the guys, and I'm like, hey, I'm gonna head over to Bianca's, no big deal. I'm
4 trying to remember who goes with me. It may have been Josh James --

5 Q Does a Mr. Marchisella, Frank Marchisella, ring a bell?

6 A Frank, yeah, I know Frank. He's, like, a super-tall guy.

7 Q Yes.

8 A But I think he's kind of -- I think he's kind of, like, dragging up behind me.
9 Like, I don't -- because, basically, I'm ahead of another group of them. So, like, there's a
10 pocket of us that go first. And I want to say, I think, Whip's with me and then maybe
11 Josh James. And then behind them is Frank and Stewart and the two Kentucky guys.
12 Anyway, they're behind us a few minutes.

13 So we get to the Phoenix, but they're only a few minutes behind, so I don't go in,
14 because we're having an issue getting into the Phoenix, because the Phoenix doesn't
15 want any of us in there. And so we all kind of converge there.

16 And then we go up. We meet with Bianca. We eat; we have a few drinks. We
17 talk to Robert Carone from Red Team 1.

18 And then Enrique calls. And Bianca says, "Come on, guys. Let's go down to the
19 garage. Kellye, this is great. You can meet Enrique, and you can give him the
20 information on the attorneys and see if he needs any legal assistance," or whatever.

21 Q Okay. So that gets us to the "garage" meeting, in quotes, right? That's
22 the lead-up?

23 So you only went to the rally at Freedom Plaza, and then you walked from that
24 rally to the Phoenix to meet with Ms. Gracia?

25 A Correct.

1 Q And you were flanked by some Oath Keeper protection, including Mr.
2 Rhodes as well?

3 A Yeah. Rhodes comes up later, but yeah. I mean, like, he's --

4 Q Okay. When you're in the Phoenix, is that when you're with Mr. Josh
5 Macias?

6 A So Josh Macias ends up over there. So I see Josh upstairs. And I think
7 Thad was up there too -- which, Thad is the one that later tells me that Sullivan -- that
8 they have -- basically Patrick Byrne is their transport --

9 Q Okay.

10 A -- that they were using Patrick Byrne.

11 Q And I think you all were also with Senator Amanda Chase too? Is this
12 around the same night?

13 A Yeah. So she shows up -- I mean, Stewart, me -- the Oath Keepers go
14 down -- like, most of them go down to, like -- they're at the top floor, and then, like,
15 maybe the second floor or the third floor is, like, a lobby area, like, an open area, you
16 know, where people -- there's, like, sofas and drink machines and, like, ice and whatever.
17 And they're all down there drinking. And that is alcoholic beverages.

18 And it's a mixture of just -- I don't even know. I don't even know. It's Oath
19 Keepers, it's Proud Boys, it's -- Josh Macias is there. It's 1AP, it's Latinos, it's Blacks for
20 Trump, it's -- the whole group.

21 Q All these people were at the Phoenix at this time?

22 A Yeah. Like, there's all --

23 Q Okay.

24 A Oh, no, no, no. No. There's still event stuff going on. This is just, like,
25 the people that aren't participating in the event.

1 Q Yeah. So all these people that aren't participating in the event from the
2 groups you just listed happen to be in the Phoenix around this time that you get there?

3 A Yeah.

4 Q Okay.

5 A Yeah, they're all there.

6 Q So there were other Proud Boys there as well, in addition to Oath Keepers?

7 A Oh, yeah. There was, yeah, tons of people.

8 Q Do you know what Proud Boys were there?

9 A They weren't ones that I could've, like, identified if you showed me a photo.
10 I mean, like, you know what I mean? Like, there are some Proud Boys that are more
11 identifiable than others, right?

12 Q Uh-huh.

13 A It was not any of their primaries. Like, it's not any of their leadership. It
14 was just, like, guys that were Proud Buys.

15 And the only reason, like -- because I was like, who are these people? But, see,
16 you've got to understand, what the media and what everybody doesn't say is that Oath
17 Keepers probably had 200 people in D.C. for the 6th, right? And Proud Boys probably
18 had 200 people in D.C. for the 6th.

19 So, I mean, it's great to be like, yup, look at these 20 people that came to
20 overthrow Congress and do all kinds of crazy shit. It's like, well, what about the other,
21 like, 180 that were out there, like, chilling in the lawn? You know what I mean?

22 Q Right.

23 A And it's the same for the Proud Boys. They have the same issue with that.
24 And Veterans for Trump and all of that. Right? They were all there. And these
25 people all know each other. So -- which is weird, but it's true.

1 Q But Mr. Thad -- it's Cisneros, right? That's who was at the Phoenix that you
2 were mentioning?

3 A Yes. Thad Cisneros.

4 Q Okay.

5 So you all go down with Ms. Gracia because Mr. Tarrío calls her. And that's when
6 the meeting in the garage occurs?

7 A Yes --

8 Q And by "meeting," I mean you're just talking -- it sounds like you were talking
9 to him about attorney options?

10 A That's it. That was it.

11 So this is what's strange. And, then, now she's telling me that there was a -- that
12 Amy Harrison needed her bag. I don't recall that. But Bianca was trying to tell me that
13 that was why they had to go down there, is because they needed the bag. And I don't
14 remember that. Maybe it happened.

15 Q Needed her bag, as in, like, her belongings?

16 A Yeah. Because apparently Amy had left her bag with somebody at the
17 Phoenix.

18 Q Okay.

19 A But what doesn't make sense about that -- and I'm just telling you this
20 because this is where they're trying to, like, influence me, and I don't recall this being
21 true, because I remember walking down with the one that was supposedly carrying the
22 bag, and she was smoking a cigarette, because I smoked one with her. And I don't
23 remember --

24 Q Who is "she"?

25 A This is, like, Bianca's -- I don't know if it's Marissa or -- whatever.

1 Q Okay. Her colleague in the red -- I think she was in, like, the red
2 sweatshirt?

3 A Yes. So that's what I'm saying, is she says, like, she's carrying a bag, but it's
4 like, I remember -- because we had had some drinks, and she was smoking, and she said,
5 do you want a cigarette, and I was like, sure. And I remember her fiddling with her stuff,
6 and I don't remember her carrying a bag. But I don't know.

7 So this is where people try to tell you stuff, and you're, like -- cognitive
8 dissonance, right? Like --

9 Q Is this Ms. Gracia telling you this after the fact?

10 A Yes.

11 Q Okay.

12 And going back, was Mr. John Sullivan, was he at the Phoenix Park that night?

13 A No.

14 Q Okay. Did you see him at all on January 5th or 6th? Because he was
15 supposed to be a speaker at the Virginia Freedom Keepers event. So did you see him at
16 all?

17 A I did not see him, no.

18 Q All right.

19 So, getting back to the meeting, did you represent Mr. Tarrío officially?

20 A No. No. No, no, no. I had nothing to do with him.

21 So this is what's funny. So we go down -- and, granted, I had, like, a drink, right?
22 Like, I had, like -- no, I mean, I'm just saying this because, like, there was booze involved,
23 and some were drunker than others. I had had, like, a beer, right, like, a can. Actually,
24 it was a cider.

25 And I was going down. She was like, hey, I'm gonna smoke real quick, and I was

1 like, okay. So I kind of slowed down with her. And Bianca's with us. And then she
2 was like, do you want one? And I was like, sure. And so I stand there and smoke with
3 her. I don't remember a bag.

4 Stewart and them are not with us at the moment. So she and I smoke, and then
5 we cross the street over to the garage. And we kind of stay there for a second because
6 then the guys are coming, because we, like, hear them, like, yell, because it's just, like,
7 around the corner and across the street, right? And so we kind of stopped for a second
8 and we're waiting on the guys.

9 The guys catch up. We go down the ramp, we come around, we come in. And
10 we see the film crew -- which, Nick Quested's a great guy. Because he actually kind of,
11 like, was the one that was like, hey, this is bullshit, with this narrative. And I was like,
12 thank you. He's like, "Save me." Because I was like, "Dude!"

13 So we come around, I see the camera crew, I see Amy, I see Enrique. They're all
14 standing, like -- I mean, it's like, if you wanted to make, like, the greatest conspiracy ever,
15 like, they're standing, like, in the corner, like -- you know what I mean? Like, the garage
16 is kind of dark over here, and there's, like, a little light, and we're, like, standing in the
17 beam of light. I mean, it was the cheesiest crap.

18 But, like, we get over there, and literally you see Stewart shake his hand. I had
19 Nick go check the video they had. He's like, Stewart was with him for 27 seconds. And
20 Stewart walks off. Bianca says, hey, Enrique, you know, I'm glad you're out, whatever.
21 And Enrique's like, yeah, I gotta get out of D.C., I'm going to Maryland, or whatever.
22 And she's like, okay.

23 And then she was like, hey, Kellye, do you have any advice, or did you get any
24 information for him? And I was like, well, I tried to call, I couldn't find you in a jail.
25 And I was like, I've got the names of a couple of attorneys if you need them. And he

1 actually says, no, I don't need them.

2 Q All right.

3 A So that's the extent of the conversation that I had with him. I mean, I
4 literally am like, all right, thanks, like, nice to meet you, have a great one.

5 And I walk over there with the camera crew and with Stewart and the Oath
6 Keepers and all of those guys. Bianca and them chat for, like -- I mean, maybe the whole
7 garage experience is 10 minutes.

8 Q Yeah. So we've watched the footage. Do you recall Mr. Tarrío talking to
9 you about two-factor authentication for his phone?

10 A I don't.

11 Q Okay.

12 A But I don't even know what the heck -- somebody else had referenced that.
13 I don't know.

14 Q Do you recall Mr. Tarrío talking about the messages on his phone at all?

15 A I don't.

16 Q So the extent of your conversation with Mr. Tarrío that night was about
17 attorney recommendations for his situation?

18 A Yes. So I know Bianca stays behind, because I leave Bianca, and Amy's kind
19 of floating off to the side at that point. Because I turn around, and I remember Amy's
20 kind of, like, here, and then you've got Bianca. And she and Enrique get really close.
21 And I don't know what they're talking about. I don't care.

22 But, I mean, I don't really have anything substantive -- I mean, if he references his
23 cell phone, he's referencing his cell phone, but it wasn't really, like, to me. Does that
24 make sense?

25 Q No, that makes sense. That makes complete sense.

1 So if there was a -- there was a separate conversation that was had between Ms.
2 Gracia, Mr. Tarrío, and Ms. Amy Harris. Is that fair?

3 A Yes. Oh, it's Harris, not Harrison. But yes. Yes, because I --

4 Q Sorry.

5 A Whatever her name is. Amy.

6 Anyway, I walk away, and I get over with the guys, and I'm standing there chatting
7 with Nick, who I had never met before. So that's how Nick is like -- as soon as that
8 narrative broke, Nick was like, oh, hell no. Because Nick knew that he and I spent more
9 time talking than any of us did with Enrique. You know what I'm saying?

10 Q Right.

11 And so, to get to my next question, do you recall the Capitol being brought up in
12 this meeting, yes or no?

13 A No.

14 Q Okay.

15 And, also, just to confirm a point from earlier, you believe that Mr. Sullivan and
16 Mr. Cisneros flew together on Mr. Patrick Byrne's plane for January 6th. Is that correct?

17 A So I believe that. That's what my understanding is. But somebody else
18 was trying to tell me that that was, no, that was earlier on, that he was not on the flight
19 that day. I don't know. Because what happens is, now all of a sudden everybody's
20 contacting me and changing stories.

21 Q Okay. No, that's fine. Thank you for that.

22 When you and Mr. Rhodes went down to the garage, were the Oath Keepers
23 providing any type of protection at all for Mr. Tarrío at that time?

24 A No.

25 Q Okay.

1 After the meeting -- so we've looked at a lot of footage. And after the meeting,
2 there's -- and this is, like, maybe an hour after this garage meeting -- we have Mr. Tarrío
3 on a video saying, "There is a need to unite, despite our differences," talking about the
4 Oath Keepers and Proud Boys.

5 Does this quote mean anything to you?

6 A Not other than setting a stage.

7 Q Okay.

8 A Because this is what I'm saying. They're spinning narratives that correlate
9 with nothing.

10 Q No, and I guess that's why we're asking the question, is because, like, we've
11 seen the footage, and it's literally an hour after he leaves this meeting with you, where
12 he's saying there is a need to unite between Oath Keepers and Proud Boys.

13 And so it's your belief that he's just setting the stage?

14 A That's absolutely my belief.

15 Q Setting the stage for what? I think I know what you're saying, but I just
16 want to make sure we truly understand what you're saying.

17 A So my biggest issue in all of this is, if you look to see who was the ones that
18 initially breached any- and everything and who was associated with that, you've got
19 orange caps, you've got Proud Boys, you've got Enri- -- you've got, like, the Ali marked
20 groups. Okay? They're the ones that are the aggressors. Then you have the Oath
21 Keepers, who are the dumbasses that come up after the fact and then just follow these
22 jerks around.

23 Q And can we note, though -- because I want to go back to what you were
24 saying earlier -- the Oath Keepers that go in first are the Florida ones who may have been,
25 according to you, cross-pollinating with these Proud Boys.

1 A Right.

2 Q So do you see where this --

3 A Yeah, that's the issue --

4 Q -- narrative could come from?

5 A -- I have. That's absolutely the issue I have.

6 But I don't know what they knew, so I can't say that those Oath Keepers 100
7 percent knew the plan was to occupy the Capitol in some way, shape, form, or fashion.
8 Do you see what I'm saying?

9 Q That's fair. No, that's a complete -- that's a fair nuance of that point.

10 I think what we're just trying to get -- the big picture, though, is, as you said, at the
11 breach points, it appears the Proud Boys are first in these breach points, and then the
12 Oath Keepers come up behind about an hour later, and then they go into the Capitol.

13 And when I say "they" and "Oath Keepers," I'm talking specifically about the
14 Florida-Ohio group of individuals that went in.

15 A Correct.

16 Q And these are the same people that earlier you said there may have been
17 some discussions between this group and the Florida Proud Boys.

18 A Correct.

19 Q Can we agree on that?

20 A Absolutely. And that's what Nick and -- not Nick -- Nate and I have been
21 looking at, is kind of, like, the factional elements of what happened with certain chapters.
22 And that's what that article was that I sent you, is we're starting to kind of break down all
23 of that stuff.

24 Q Would it surprise you if there was a phone call between Mr. Tarrío and
25 Mr. Meggs before January 6th?

1 A Holy shit. No. That wouldn't surprise me.

2 Q No, I'm asking you, would it have surprised you if there is a call?

3 A Not at this point, no. At the beginning, if you had asked me this during that
4 timeframe, I'd have been like, no. But, now, I am fully aware that there's more in play
5 here than meets the eye, so to speak.

6 Q Okay.

7 Getting back to January 5th, do you recall any meetings that night with Oath
8 Keepers preparing for January 6th?

9 A There was not -- not, like -- not -- okay. So, no. I know where you're
10 going with this now.

11 Okay. So, for us, we were drinking, okay? We were drinking. There was lots
12 of -- and this is where the "storm the Capitol" stuff will come into play. This is where I
13 can throw that off on Josh Macias and all of them, right?

14 Because everybody's like, "Yeah, we're gonna go rally at the Capitol. Yeah, we're
15 gonna go storm the Capitol." Whatever. To me, I just told you I came out of, like, May
16 in Texas, where, oh, yeah, we were storming the capitol, right? But that was rallying,
17 right? That was, like, microphones, that was bullhorns, that was whatever. There was
18 no distinction line drawn.

19 Do you see what I'm saying?

20 Q Uh-huh.

21 A So, when you're me listening to him, it's like, okay, yeah, we're gonna go
22 rally, great. Because how many times had you heard this, right? You're gonna rally at
23 the Capitol. Because that's where Ali's stage was. Hello?

24 So it's like, what they mean and what they're saying -- I was taking what they were
25 saying out of context, I guess, because I was taking it as normal. I don't know. I have

1 no earthly idea.

2 But what I do know is that there was that kind of stuff, but it was never, like, we're
3 going in. Nobody's breaking in. Nobody's breaching anything. There's no violence.
4 There's no indication of any of that type of stuff.

5 Do you see what I'm saying?

6 Q I do. I do. And that's -- yes, I understand what you're saying.

7 And just to make it clear -- sorry. I'm getting back to the timeline. That's just
8 how my mind is working right now. January 5th, you all stayed at the Hilton Garden Inn
9 in Vienna after you left the Phoenix Park?

10 A Correct. Correct.

11 Q Did you go anywhere in between, you know, the Phoenix Park Hotel and --

12 A Uh-huh.

13 Q -- the Hilton Garden Inn? Did you stop anywhere else?

14 A Oh, yeah. We got lost in the park and walking around D.C. And this is
15 why I'm telling you the GPS was messed up.

16 So we were going to go get -- we thought that the Kentucky boys' car was the
17 closest vehicle -- or maybe it was Whip --

18 Q Who are the Kentucky boys, by the way?

19 A I don't remember their names, but there were two, and they were cousins.

20 Q One more random question. Who is "Horsewhisperer Texas" in these
21 chats?

22 A That's Marcia Strickler. That's the one that would've been the one that
23 had --

24 Q Marcia Strickler?

25 A Yes.

1 Q Got it. Okay. Got it.

2 A So, anyway. So we leave -- and I told you everybody had had a few drinks,
3 okay? I only say that because we look like idiots after this.

4 I think I try to go get more liquor at -- I'm looking for liquor stores. And I may
5 have gone over to -- was it, like, the trains or whatever? Like, across from the Phoenix
6 is, like, the -- one of those stations. I don't know. I was looking for an open liquor
7 store. That one was closed. We ended up going to another one that was open. So
8 we did roam around there for a bit, but I was looking for a liquor store. This was after
9 the garage.

10 And so I found liquor. We had some drinks, more drinks, and then this time I
11 was probably was a little buzzed. And we were trying to use GPS. The GPS was
12 messed up. We were trying to get to vehicles. We end up roaming around, I don't
13 know how long, I'll be honest with you, trying to find the parking garage. It was for
14 Whip's vehicle.

15 We can't get in there, so we end up in the Kentucky guys' vehicle. We don't go
16 back to get ours. Or maybe Whip does get his. I can't remember. See, this is the
17 problem with this part.

18 But I don't recall anybody talking about doing anything like overthrowing
19 Congress. We were drinking.

20 Q Okay.

21 A You see what I'm saying?

22 Q Yep. No, I do. And when you say --

23 A We weren't downing Pabst -- we weren't downing Pabst, like, you know,
24 polishing the guns and, like -- you know. Like, we weren't doing any of that, no. We
25 were getting drunk, so --

1 Q When you said Marcia Strickler, it's M-a-r-c-i-a? Is that how you spell
2 "Marcia"?

3 A Yes.

4 Q Marcia Strickler Watson?

5 A Yes, that's it.

6 Q Got it. Okay. Thank you.

7 So you go back to the hotel, I'm assuming just go to bed, and then wake up for the
8 6th. Is that what happens?

9 A Yep, pretty much.

10 Q So you wake up on the 6th. Do you all leave that morning and go straight
11 to the Virginia Freedom Keepers event?

12 A I am so glad you asked. No, because we stopped for the QRF supplies.

13 Q Okay. What did you stop -- what did you pick up?

14 A Probably about eight boxes of -- because Whip and I had an argument in the
15 grocery store over which of our favorite meal-replacement snacks were the best and
16 what brands were the best. And we got some Gatorades and juices and that kind of
17 stuff and packed that into the car.

18 Q So you stopped. That was in Ballston that you stopped?

19 A Not in Ballston. In Tyson's Corner.

20 Q Okay. Okay.

21 A So we stop at a grocery store there, and we go in and we buy -- I think they
22 even get some fresh fruit, from what I recall, but they're more concerned with just, like,
23 sugar levels for people and stuff like that. And we're trying to get stuff to make sure
24 that they have water and juice and -- I mean, so we buy, like, a bunch of, like, random,
25 weird shit, right?

1 Q Yep.

2 A And they shove it in the bags for people so that we can -- so we got our QRF
3 supplies! So -- you know, because, the night before, we were polishing our rifles and
4 stuff.

5 Q I hate to go back to the 5th. I have to be careful; I have to go back. Did
6 you all see Mr. Stone on the 5th?

7 A No. I did not. That does not mean Stewart didn't, because, remember,
8 she calls me.

9 Q Right. But were Oath Keepers ever providing protection for Mr. Stone on
10 the 5th? Is that correct?

11 A They were. But you're asking if I saw them.

12 Q I know you didn't. I'm not talking about you personally. I'm just asking --

13 A Oh.

14 Q I'm just trying to make sure I understand what the Oath Keepers were doing.
15 It was Mr. Joshua James providing the PSD for Mr. Stone on the 5th?

16 A So -- but, see, I swear Josh ends up at the Phoenix.

1

2 [4:51 p.m.]

3 The Witness. I swear he does.

4 So I'm saying this just for context. Josh, I think, somewhere in there decides he
5 likes me, and so he kind of starts following me around.

6 BY [REDACTED]:

7 Q Okay.

8 A So I say that because it seems like Josh always pops up stuff, and then later
9 he says that. I'm telling you that for context.

10 Q No, it's fair. That's why -- I mean, it adds context for why you believe
11 Mr. Joshua James wound up at the Phoenix Park Hotel on January --

12 A Yeah, because he was -- he was always popping up. And I couldn't figure
13 out why Josh was always popping up until later. I was like -- because then he's, like, you
14 know, and I'm, like, okay, Josh, like, I get it, I love you, like, you're a great guy, whatever.
15 But, like, that was kind of the thing, like, he was always popping up.

16 And so I swear Josh was around, but I don't know because he should've been with
17 Roger Stone. And I know he's with Roger Stone the next day.

18 Q Okay. So -- okay. So then on January 6th, you told us earlier the groups
19 of people that are getting protection for them. You have the Florida Oath Keepers and
20 some of the Ohio Oath Keepers at the Ellipse. You have Mr. Joshua James and a few
21 others with Mr. Roger Stone. And then you have Mr. Rhodes and Whip and others at
22 the stage at the Capitol.

23 Is that kind of where the three groups are separated around the city?

24 A At the stage at the Capitol? Oh, like, for Latinos for Trump and all of them?

25 Q Correct. Correct.

1 A Yes. Yes, yes, yes. I thought you were, like -- I was, like, no, he was not at
2 that other one over there, like, he was at the one on 7. He was not at 8.

3 Q What was the general mood on the morning of January 6th from what you
4 could -- from the people that you were around?

5 A Cold as hell. Like, it was not anything any different than any -- we were
6 drinking coffee, we were cold, we were bitching about the weather. It was -- I mean,
7 bitching and moaning but not aggressive, not --

8 Q Not anticipating anything that would happen later on in the day?

9 A Right. Like, it was just cold, like, it was just -- like, we were pissed off about
10 GPS. We couldn't find where we were going. I was grumpy because I was cold. They
11 were grumpy because they were cold. And we couldn't find where we were going.
12 And it was just irritating.

13 But it wasn't -- it's, like morning plan goes bad. You know what I mean? Like, it
14 was, like, you're running late to work. You know what I'm saying? Like, it's just off.

15 Q Oh, that's fair. That makes sense.

16 I'm trying to think of -- so I want to fast-forward a little bit, because you didn't go
17 to the Ellipse, did you?

18 A No, I didn't go.

19 Q And Mr. Rhodes didn't either?

20 A No, neither one of us went. We went over to the stage --

21 Q And I believe the event with Latinos for Trump and the Virginia Freedom
22 Keepers kind of took a break late morning, around noonish, late 11, like, there was a
23 break in the action. Is that correct?

24 A So I was already gone by then because I told you I was cold, and I was just -- I
25 was miserable. And I went to go to the bathroom at -- the only Porta Potties out there

1 were the ones over at the Capitol on the back side, like, by the Supreme Court.

2 Q Yep.

3 A I went over there. Trump was still speaking at that point. And so I wait in
4 line, I do the happy dance. I get in, I get out. And then I'm like, that's it, I'm done, I'm
5 not going back over there, I'm not going to go stand in the cold anymore.

6 Because I knew that one of the guys -- or I knew that actually numerous people
7 had stayed in the city. And so I was like, whichever one has a hotel in this vicinity, find
8 me, you know, somewhere to go.

9 I'm hungry, I'm moody, you know, like, I'm cold, I'm done. We've already done
10 the, like, 30-second Stewart got to rant and rave, and I was just, like, yeah, what he said.

11 And then -- so I was, like, I'm done, I'm done. Whatever else these people do,
12 that's, like -- and I don't mean that. I'm just saying, like, I'm not going to stand around
13 for everybody's speeches. I don't care. I've heard them all already, right?

14 Q Right.

15 A We've done this numerous times now. So I was, like, I don't care about
16 anybody else, I'm going. I'm going to go watch Congress.

17 That was my plan. I wanted to go watch Congress. So at that point -- and this
18 was way early. So this was like 11-ish maybe. I don't know.

19 Q So how many people were at the event when you were there that morning,
20 approximately?

21 A Nobody.

22 Q Okay. So there were speakers speaking, but it was to a crowd of no one
23 basically?

24 A That's why I said, I don't care what they do over there, like, I'm done, like,
25 I'm not going to go, like, stand there. I mean, there was, like, 20 people there, and 40 of

1 them was, like -- okay, okay, okay, I'll give them, there was, like, maybe 50 people there,
2 but, like, 20 of them were, like, part of the group. And then 30 of them were just, like, I
3 don't know who they were, people walking by.

4 Like, it was -- there was just, like, nobody there. It was dead over there. But
5 part of that was, like I told you, the GPS wasn't even working. So I was, like, I'm not
6 going to go stand over there and freeze with these people. I don't care, like, I've already
7 heard their stuff before.

8 Q All right. Do you find it odd that Ms. Gracia left as well? And was it at the
9 Capitol?

10 A So it's funny because I didn't know she left. And they had a whole
11 afternoon's worth of speakers, right?

12 Q Correct.

13 A And then so I leave at, like, 10, and I go to -- it's, like, a mile down. It was
14 Dario -- I don't know Dario's last name, but I did remember it was Dario. I go down to
15 his hotel. I think it was, like, named after some former something.

16 And we go in. We stop at the food trucks on the way. It was right at about a
17 mile. I grab chicken wings because that's what the truck had.

18 Q But were you tracking -- I guess the question is, do you find it odd that
19 Ms. Gracia wasn't there?

20 A Yes, I find it very odd, and it makes me very angry in hindsight because --

21 Q Why does it make you angry in hindsight?

22 A Because it's the same reason why conveniently we were in a garage, right?
23 It's the same freakin' thing. It's, like, I feel like I'm the idiot that they were shoving
24 around to be the patsy at the end. And I'm, like, what's the shit? Like, I'm, like, the
25 only one that wasn't part of them.

1 Q Is it because -- and, look, this is me just asking to see what you think of it.
2 Is it similar to, like, Mr. Tarrío not being in D.C. on January 6th? Is that the way you view
3 Ms. Gracia not being at the Capitol?

4 A It's how I view all of them, especially how everything breaks down after the
5 fact. See, at the time it didn't make any -- like, I wasn't seeing anybody as guilty or bad
6 or any of that stuff. And I didn't see it that way for months after that because it was,
7 like, shell shock.

8 Now I know why I got stuck in this circle of hell for, like, a year, right, is because
9 they wouldn't leave me alone. And it's because they kept -- they kept me in the loop.
10 It was like they wanted to keep their -- you have no idea. I have lived 2 years -- no, a
11 year and a half under the thumb of people I had no idea were just trying to keep their
12 thumb on me. Does that make sense?

13 Q No, it's, I think -- yeah, I think that's why we're asking what your impressions
14 are of certain individuals not being at the Capitol, especially when they had events
15 scheduled at the Capitol.

16 A I know. So -- well, but, see, you could say the same thing for Stewart,
17 right? But it was me, and I will tell you it was me. It was, like, whatever time it was, I
18 was cold, I was whining, I was, like, I want some food, and I want to go watch Congress.

19 Because I'm stupid and thought they were legitimately going to go through and
20 have hearings on the five, six, whatever, States. And I'm the idiot in the crowd. So if
21 I'm --

22 Q So let me stop you there. All right. So you're watching what you thought
23 was going to be a debate, a legal debate, which I appreciate, you're a lawyer, you're
24 tracking legal arguments, you're tracking congressional protocol. So you're watching
25 this.

1 When do you first become aware, though, that there is a riot breaking out at the
2 Capitol Grounds?

3 A While I'm watching them start, so I'm watching them start, they're like
4 getting to the point of, like, we're getting going. And then here comes the phone call
5 from Whip, and it's, like, shit's gone down at the Capitol. And Stewart's, like, shit's gone
6 down at the Capitol.

7 And I'm sitting there, and I'm, like, I want my chicken wings and I want to watch
8 Congress. But I realized the boys are both, like, chomping at the bit at that point,
9 because they don't know what's going on, right?

10 So Dario's in there, like, putting clothes on because he was in his, like, sweats and
11 stuff. And Stewart's, like, getting up. He's not polishing a gun or anything. He's just,
12 like, what the hell's going on? And he's, like, where are the guys? And he's, like, trying
13 to communicate. And he's trying to start getting a hold of Kelly Meggs and all of them,
14 because he's, like, what the hell? Because that's what Whip's saying, is, Whip's, like, I
15 don't know where anybody's at, I don't know what's going on, but things -- like, all hell's
16 broken out.

17 And so I'm, like, with the guys for this. And then they're like, okay, let's go.
18 And I'm, like, okay. We go.

19 And then we get over there, and we stay on the northwest corner, like -- or the
20 north -- I go around -- not west -- the northeast -- no. Whatever.

21 We go over to the side where the Columbus doors are, then we come back over.
22 And then I walk around to the north side, and then I walk around to the far side and I
23 walk over towards -- it wasn't that bad at that point, but when it started getting bad,
24 that's when Dario and Stewart -- and by "bad," I mean, that's when I think they opened
25 the doors and they stopped -- they fire a couple of, like, canisters of pepper spray out.

1 And that's when the guys are, like, yep, that's it, you're out of here.

2 Q Can I stop you real quick? Who is Dario?

3 A I don't know. I don't know. He's one of their visible Oath Keepers. Like,
4 if you look through photos. I recognized him when I met him.

5 Q Okay. So you and Mr. Rhodes walked back to the Capitol. I guess, why do
6 you walk towards where the riot is happening?

7 A Because they're calling -- because Whip can't -- allegedly Whip can't find,
8 what's his face, Kelly Meggs and them, right? And he can't find the stage for Ali because
9 he went over -- allegedly. I don't know. I don't know any of this. I'm telling you what
10 I'm hearing, okay? I mean, I can't verify with his GPS where he was actually located
11 when he was saying this stuff, is what I'm trying to suggest.

12 Q Right.

13 A Because at this point, I don't know anymore.

14 But Whip is calling, saying, like, I can't find the stage, I can't find Ali, I can't find the
15 guys, I don't know where anybody's at.

16 Stewart had talked to -- and this is how I know Josh James and them were tucked
17 up with Roger Stone, is because when we were getting chicken wings, he was on the
18 phone with Josh James, and Josh James was saying, Roger Stone's not leaving his hotel
19 room, we're bored, what can we do instead?

20 And Stewart says, I don't know, hang out for a little bit longer, what time is he
21 supposed to be and where, I'll try to get a hold of Whip in a little bit, see if you're needed
22 somewhere else, just stand down.

23 Like, I mean, he's literally, like -- because this is the conversation he's literally
24 having outside the hotel. And so Josh James is like, fine, we're just sitting out in the
25 hallway on our phones, we're bored.

1 And the next thing I know, we've gone up, we're watching, we're eating. They
2 call. They grab their crap. We start heading back. They can't find the guys. So
3 Stewart's trying to call the guys, trying to verify where everybody's at. He confirms with
4 Josh he's still with Roger Stone. He's like, okay, stay there, like, you know, whatever.

5 And then you've got -- and I'm just listening to the other side of this and I'm
6 talking to Dario, but it sounds to me like he's, like --

7 Q And Dario, it's D-a-r-i-o, not Tarrio, right? D?

8 A Yes, Dario, D-a-r-i-o.

9 Q Okay.

10 A And Dario -- yeah, it's one of theirs that, like, I think if you go back and look
11 at the pictures from Ferguson, if you go back to that, you'll find Dario in those photos.

12 Q Yeah, we'll figure that out. But, okay, keep going with what you were
13 saying.

14 A Okay. So Dario is -- anyway, I'm walking with Dario. Stewart's on the
15 phone and he's messaging. I don't know that his messages are starting -- I think they're
16 stopping going through because he's starting to get pissed off.

17 And then he talks -- he's not pissed off, but he's just, like, frustrated because he's,
18 like, what the hell, I can't get a hold of anybody.

19 And so he talks to Whip -- I got to say, be careful not to make anybody violent.

20 He talks to Whip again. And Whip, I know, is saying, there's no stage, because
21 Stewart's, like, why is there no stage? And he's, like, I thought he was supposed to be
22 on the Supreme Court side.

23 And then Stewart looks at me and he's, like, did you see a stage when we were
24 over there earlier? And I was, like, no I didn't. And he's, like, well, did you?

25 And so he's having kind of like this cross-communication about where the stage

1 should've been on the Supreme Court side, because we went to the -- we went to the
2 potties, and so he was, like, do you remember seeing a stage. And I was, like, no, I
3 don't, I don't remember a stage. And I started thinking about it. I was, like, no, there
4 wasn't anything being set up over there.

5 And so then at this point, we're -- I don't know -- we're getting kind of close. And
6 we started seeing everybody funneling in, right? So we started seeing the crowds kind
7 of getting there.

8 And we don't see -- like, the barricades are gone, like, at the little guard station
9 and stuff like that. And, like, there are just people, like -- it's, like, open season, like,
10 there's, like -- the cops have kind of come out, and they're just, like, standing -- you know,
11 because there's, like, those little bump sides on the north side where there's, like, these
12 little bumps where you would go in, and there should've been, like, gates and stuff like
13 that, right, for, like, vehicles to pop through.

14 Like, none of that was -- like, they were open. Everything was like -- people were
15 just, like, converging. It was like a -- it was like a festival, right? It wasn't -- I didn't see
16 bike racks. There were people everywhere. They were already up on the Columbus
17 stairs.

18 Like we walked straight over to the Columbus stairs. I didn't go up the Columbus
19 stairs. I stood kind of at the base. I think I, like, put my foot on the bottom one. But I
20 was, like, looking, and I started recording videos because I was, like, wow, this is really
21 amazing, it was great, because people were singing, they were chanting. There were
22 people up there praying.

23 Like so we were there for a few minutes, and Stewart's still trying to find the guys.
24 I'm getting nosey at this point, so I go around to the north side.

25 Dario follows me for a little bit. We find Whip at some point, but I think Whip

1 shows up after I've already been -- yes, Whip shows up after they've pulled me back out
2 of the west side -- the upper west side, not the lower west side. I never got over to
3 where the staging area was. I had no idea what was going on over there, nor could I
4 hear it, like, I'd no clue.

5 But up there, it was still relatively calm, and I was just, like, watching. And then I
6 kind of go off into that little terraced area, and I look down and take a few pictures into
7 the lawn, like, the greater lawn aspect of it, going, shooting down towards the
8 Washington Monument.

9 So I get a couple pictures of, like, just the crowd itself, right? And then the guys
10 kind of start pulling me back because the crowds are kind of getting more and more
11 packed into that area. And so the guys are, like, come on, let's go.

12 And so they pull me out, and we go back to the north side. We hang out for a
13 little bit. I'm literally bored. I mean, I'm not going to lie, I'm literally, like, this is stupid,
14 and I'm cold, and why am I back out here.

15 But Stewart's trying to get a hold of the guys, from what I can tell. I mean, I'm
16 not -- it doesn't seem like anything else when I look at his stuff. He never can get a call
17 through to actually Kelly Meggs, although they do recognize that there's a call.

18 That call never goes through, because Stewart's --

19 Q I understand. And sorry, I just want to keep kind of focused on what we're
20 saying.

21 So while you're with Mr. Rhodes and you walk back to the Capitol we saw a
22 message from that morning in the January 6th Signal chat where it seems like
23 Horsewhisperer, who I believe now is Ms. Marcia, sends pictures of the Proud Boys at the
24 Capitol.

25 Why is that even relevant to that group chat?

1 A So Marcia deemed herself to be like -- because she wasn't in D.C. And I
2 don't know, I'm just telling you what --

3 Q Right.

4 A I wasn't paying attention to these chats at the time. But later it was, like,
5 people were watching crap online, right?

6 And by the way, Marcia was planning on going to D.C. and did not go, just for the
7 record.

8 Q Okay. So you're not sure why Ms. Marcia -- Ms. Strickler even sent that
9 message.

10 And then also in the same group chat, after the attack on the Capitol has started,
11 and Mr. Rhodes -- and this has been cited in DOJ documents, and we've seen
12 it -- Mr. Rhodes says, "All I see Trump doing is complaining. I see no intent by him to do
13 anything. So the patriots are taking it into their own hands. They've had enough," end
14 quote.

15 Do you recall this message?

16 A I do recall that message, but that's also why I say -- and I don't know,
17 because I don't know what other stuff is going on. But what I'm seeing is that Stewart
18 and I never go over to the other side, right?

19 Q The other side as in the west side of the Capitol?

20 A The southwest side, like, the lower tier where all the violence was.

21 Q Right, right, okay.

22 A Stewart and I never, ever, because he's trying, as far as I can tell, what I'm
23 witnessing, okay, because I don't -- I mean, what I'm trying to say is, there could be
24 something that surprises me. I'm not going to say that that's not a possibility.

25 But from what I'm observing, Stewart is trying really hard to locate Kelly Meggs.

1 He's trying really hard to locate Whip. He's trying really hard to notice where the guys
2 are that are with Roger Stone. And he's trying real hard to figure out why the hell
3 there's not a stage where the stage should've been.

4 Q That's helpful. Thank you. No, that's helpful.

5 So speaking of Mr. Kelly Meggs, when did you all become aware that Oath
6 Keepers had gone into the Capitol?

7 A So when -- so we stand there forever. I don't know how long we're there.
8 We're on the -- we stay around the north-northeast side. And Whip shows up, and then
9 Whip and Dario take off because they're going to find the guys again.

10 I mean, I'm like, if these guys are good actors, they're good actors, but, you know,
11 to me, it looked like, they're, like, let's go see if we can find them, we don't know where
12 the hell they're at.

13 Lo and behold, they would've already been up on the stairs and already gone into
14 the Capitol, right? But we didn't know that at the time. So --

15 Q When did you become aware, though, when did you become aware?

16 A When they came -- well, so they had already gone in, they came out. All of
17 a sudden, like, probably later a timeframe down the --

18 Q Around 4 p.m., I guess the DOJ document is when it alleges that on the
19 northeast side of the Capitol you all reconvened together, it appears --

20 A And that's what Stewart had been trying to get out, was I'm on the north, I'm
21 on the northeast side, like, get your butt over here. You know what I mean? So from
22 what --

23 Q No, we're tracking that. I guess, what was your reaction, though, to finding
24 out around 4 p.m. after the fact that these individuals had gone into the Capitol? What
25 was your reaction?

1 A I jumped their butts. And then the Thomas Baranyi guy or whatever,
2 whatever, one of the guys that was with Ashli Babbitt when she got shot, he -- so he was
3 the one in the blue hoodie. It was, like, a baby blue hoodie. And then there's a guy
4 that's, like, a taller guy that was, like, in maybe a white hoodie.

5 I just remember the Thomas guy because I talked to him the most. And he
6 comes up and he's keeps trying to talk the Oath Keepers into going back inside. He's,
7 like, let's go do a sit-in, let's go inside. And I'm basically cussing them out, and I'm telling
8 them to get the hell away, right? I'm, like, get out of here, just go.

9 Q So it sounds like you weren't happy with hearing the fact that they had gone
10 inside the Capitol?

11 A No, I wasn't happy because I was -- they were, like, well, we went in,
12 because you had no choice, blah, blah, blah, blah, blah. And I'm, like, I don't know
13 what's happening, but I would not be going into the Capitol right now.

14 Because obviously at that point there -- so we got the kind of, like, the riot alert,
15 you know, like the -- like, everybody to your -- to your cubby holes. And, like, I'm
16 realizing at this point because, like, when I first got there, I wasn't seeing the violence and
17 stuff like that.

18 And then you hear Ashli Babbitt gets shot. And then you move forward to, like,
19 the phone going off, and then, like, I'm starting to get text messages, like -- or maybe it
20 was Facebook messages -- hell, I don't know -- or comments on the Facebook, I don't
21 know.

22 But you can start seeing -- I'm starting to see there's more to the story than what I
23 had witnessed, right? So there's portions of the day where I look like a damn fool
24 because I'm running around smiling and stuff, thinking the world's a beautiful place.
25 And then meanwhile there's, like, full blown, like, battle royale going on, on the other

1 side.

2 And then so, like, it's starting to dawn on me at that point. And so then I start
3 kind of getting, like, defensive and protective of the group, you know, because I'm,
4 like -- and this is where I'm, like, okay, everybody walk away, like, get away from them.

5 Because people were literally coming up to them, trying to convince them to go
6 somewhere else, you know. And so I was, like, go, get out. And so I'm, like, literally
7 forming a protective barrier at the same time the guys are all admitting that they had
8 been inside. And I was, like, oh my gosh.

9 And then everybody else started showing up. So, like, finally the messages are
10 going through. And like a giant group of Oath Keepers, more than what the ones that
11 went inside were, start showing up.

12 And that's why you start seeing the group swelling, right, you can see in the
13 photos, because there's, like, a ton of guys that are around there. None of them are
14 aggressive. None of them are mad. None of them are doing anything. They're just
15 trying to figure out what the hell's going on. And then, you know, we just chitchat for a
16 bit and then disband and go.

17 I will say press pool came up and asked me some questions. She gave me a card.
18 I have no earthly idea. She was -- I don't know who she was press for, but she was press
19 pool for the Capitol, I guess, maybe.

20 Anyway, she comes up --

21 Q She came up and said what?

22 A She just wanted to know what was going on, what had happened and, you
23 know, a bunch of stuff like that. And I was -- I was -- I didn't know. I was just, like, no,
24 we're not talking to press, we're not.

25 And then some other media tried to come up, and I was, like -- and, no, they didn't

1 go blow up CNN's little group either.

2 But there were media that was trying to get to them, and so I was blocking media.
3 I was blocking provocateur types that were trying to drag them back in. And I kind of
4 like told the guys basically at that point just, like, get, like, we're getting out of here.
5 This is bad.

6 But it was not because of anything other than there were just people keep coming
7 up to them, trying to -- I don't know what they wanted them to do.

8 Q Ms. SoRelle, I want to ask you a question and get your reaction to it.

9 So we've heard from another witness who was near Mr. Meggs on January 6th as
10 Mr. Meggs and that group was leaving the Ellipse and walking up to the Capitol.

11 So when Mr. Meggs and that Florida group and the Ohio Oath Keeper group got
12 up to the Capitol, it had already been breached. And we have a witness who said,
13 quote/unquote, that Mr. Meggs said, "This is our opportunity," before going into the
14 Capitol.

15 Would that quote surprise you?

16 A I have no earthly idea what he meant. I really don't.

17 Q Okay. So you don't have a reaction really to that quote?

18 A I don't know why any of them went inside, like, I don't. I mean, I -- and this
19 is where Stewart takes some shit because, like, his initial response was, my people are
20 stupid. You know?

21 Like, it just -- like, I didn't know people were going in, and then once I realized that
22 was an issue, and I was, like, there are people in the Capitol, and I'm, like, why would you
23 go in?

24 And then there were people, like, breaking in on other doors, and we started
25 figuring that out. And I was just, like, what are these people doing, this is stupid. You

1 know what I mean?

2 So, like, Stewart and all of us were really just, like, guys, get over here, like, stay
3 away from this crap. Like, we were -- opposite of what is being portrayed, it was, like,
4 this is dumb. Don't -- it's a boobytrap, right? Like, you don't go into the Capitol. You
5 know what I mean?

6 [REDACTED]. So, Ms. SoRelle, we've been going for quite a bit. It's 5:17 p.m.
7 And we still have a few more topics we want to cover you with you, like, after
8 January 6th.

9 Do you want to keep going now, or do you want to continue on another day? It's
10 up to you. We can reconvene at another time. What works for you?

11 The Witness. How much longer do you have?

12 [REDACTED]. I can't accurately say that.

13 And we can go off the record at 5:17 p.m. We can have this conversation off the
14 record.

15 [Discussion off the record.]

16 [REDACTED]. We'll go back on the record at 5:19 p.m.

17 So off the record we just spoke with Ms. SoRelle about scheduling another date to
18 continue this deposition. We expect it'll be about a 3-hour block to continue questions
19 into the night of January 6th and then after January 6th.

20 We will now go on a recess but leave the deposition open pursuant to the
21 subpoena that was issued to Ms. SoRelle.

22 So, Ms. SoRelle, we will shoot you an email right now actually. Or I'll talk to
23 some operations folks and we'll shoot you one in the next hour to get a date, probably for
24 next week, on the schedule that works for you for about 3 hours.

25 The Witness. Sounds good.

1 [REDACTED]. All right. Thank you, Ms. SoRelle.

2 [REDACTED]. Thank you, Ms. SoRelle. It's been a long day, and we really
3 appreciate it.

4 [REDACTED]. We really do.

5 The Witness. All right.

6 [REDACTED]. All right. Thank you.

7 [REDACTED]. Take care.

8 [REDACTED]. Thank you.

9 The Witness. Bye.

10 [REDACTED]. And thanks to the reporters.

11 [REDACTED]. Yes.

12 [Whereupon, at 5:21 p.m., the deposition was recessed, subject to the call of the
13 chair.]

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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