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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: AUDRA JOY LEMONS-JOHNSON

Wednesday, April 20, 2022

Washington, D.C.

The deposition in the above matter was held via Zoom, commencing at 2:10 p.m.

1

2 Appearances:

3

4

5 For the SELECT COMMITTEE TO INVESTIGATE

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

7

8 [REDACTED], STAFF ASSOCIATE

9 [REDACTED], INVESTIGATIVE COUNSEL

10 [REDACTED], INVESTIGATIVE COUNSEL

11

12 For THE WITNESS:

13

14 STEVEN DULAN

1

2 [REDACTED] Let's go on the record at 2:09 p.m. for the deposition of Audra
3 Lemons-Johnson.

4 Good afternoon. This is a deposition of Audra Lemons-Johnson conducted by
5 the House Select Committee to Investigate the January 6th Attack on the United States
6 Capitol pursuant to House resolution 503.

7 Ms. Johnson, please state your full name and spell your last name for the record.

8 The Witness. Audra Joy Johnson, J-o-h-n-s-o-n.

9 [REDACTED] Thank you. And would you please raise your right hand to be sworn
10 by the court reporter.

11 The Reporter. Do you solemnly declare 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. I do.

15 [REDACTED] Thank you.

16 So this is going to be a staff-led deposition, and members, of course, may choose
17 to ask questions, but I don't see any on the Webex with us right now, but if they do join,
18 they could also ask you questions. My name is [REDACTED], investigative counsel with
19 the select committee. And on the Zoom with us today is [REDACTED], also an
20 investigative counsel.

21 So we will follow the House deposition rules that we've provided to your counsel
22 previously. Under the House deposition rules, you are permitted to have an attorney
23 present. Ms. Johnson, at this time, I'm going to ask your counsel to please state his
24 name for the record.

25 Mr. Dulan. Sure. Steve Dulan, D-u-l-a-n.

1 ██████████ Thank you very much, Mr. Dulan.

2 And under the House deposition rules, neither committee members nor staff may
3 discuss the substance of testimony you provide today unless the committee approves
4 release. You and Mr. Dulan will have an opportunity to review the transcript of this
5 deposition.

6 And before we begin, I'd like to describe a few ground rules. So there is an
7 official reporter transcribing the record of this deposition. The reporter also is joining us
8 by Zoom, so please wait until each question is completed before you begin your response,
9 and we will try to wait until your response is complete before we ask our next question.
10 It's just very hard with, you know, the remote deposition for the court reporter to hear
11 voices talking at the same time. And I know I'm -- I've been bad at it before, so I always
12 like to remind myself and everyone else to make sure we're not talking over each other.

13 And the reporter also cannot record nonverbal responses, such as shaking your
14 head, so it is important that you answer each question with an audible, verbal response.
15 For the benefit of the reporter and the record, there may be times where I spell a name
16 or a word that we are using, or that I ask that you do the same.

17 And we ask that you provide complete answers based on your best recollection.
18 If the question is not clear, which may happen, please ask for clarification. And if you do
19 not know the answer, please simply say so.

20 Logistically, if you need any breaks for comfort or to talk to Mr. Dulan about
21 anything, just let us know. We're happy to accommodate. We'll mute our
22 microphones, turn our cameras off, and you guys can have a conversation or take
23 whatever time you need.

24 So like I said, throughout this deposition, we will be directing your attention to
25 exhibits, which will be displayed on the screen. And when we refer you to a document

1 you can take your time to familiarize yourself with it before we discuss it.

2 So I am going to show you exhibit 1. Okay. Can you see exhibit 1,
3 Ms. Johnson?

4 The Witness. I can't see anything.

5 [REDACTED] You can't see anything? Can you see it now, Mr. Dulan?

6 Mr. Dulan. I can see it, yeah. It's a subpoena.

7 The Witness. Yeah, I see a subpoena. I hear a video playing though.

8 [REDACTED] Ah, one second.

9 Mr. Dulan. Yeah, I was hearing the audio but also looking at the subpoena.

10 [REDACTED] Okay.

11 The Witness. Yeah, that's what we saw.

12 [REDACTED] Let's try this again. Is that better?

13 The Witness. All I see is the subpoena.

14 Mr. Dulan. Yep, no sound.

15 [REDACTED] That is the exhibit, Ms. Johnson. So do you recognize this subpoena
16 as the one that the select committee served to you?

17 The Witness. Yes.

18 [REDACTED] Great. Thank you very much. So under the subpoena, you may
19 only refuse to answer a question to preserve a privilege recognized by the select
20 committee. If you refuse to answer a question based on a privilege, staff may either
21 proceed with the deposition, or seek a ruling from the chairman on the objection. If the
22 chairman overrules such an objection, you are required to answer the question.

23 And at this time, I would ask that Mr. Dulan please place on the record any
24 objections that he might have or make any opening remarks that he might have.

25 Mr. Dulan. No, we don't have any blanket objections. We're just going to take

1 them as we go. Thank you.

2 ██████████ Great. Thank you very much.

3 And, Ms. Johnson, I also.

4 Want to remind you, as we do with all witnesses, that it is unlawful to deliberately
5 provide false information to Congress. Since this deposition is under oath, providing
6 false information could result in criminal penalties to include for perjury and/or providing
7 false information. Do you understand?

8 The Witness. Yes. Sorry. You broke up a little bit.

9 ██████████ Okay. I was saying that since this deposition is under oath,
10 providing false information could result in criminal penalties, including perjury and
11 providing false statements, and it's just -- it's unlawful to deliberately provide false
12 information to Congress. We tell that to all witnesses.

13 Mr. Dulan. And if I could, ██████████, I'm sorry, we should make -- there's one
14 statement that should be made right now, which is that my client reports that she no
15 longer has the same cell phone that she had during the relevant timeframe, so she was
16 unable to obtain some texts, and possibly some other documents. As you can see, we
17 provided 256 pages total, I believe it is. However, there was a lack of ability that's been
18 reported to me and should be noted here to get everything.

19 ██████████ Understood. Thank you very much.

20 BY ██████████:

21 Q So we'll get into the substantive questions now and just start with a little bit
22 of background, Ms. Johnson. How old are you?

23 A I'm 35.

24 Q Great. And where do you currently live?

25 A Hudsonville, Michigan.

1 Q How long have you lived there?

2 A We moved here the 26th, I believe, of March.

3 Q Okay. Have you lived in that area of Michigan though for a while?

4 A I lived in Battle Creek for about a year before we moved here, but for the
5 most part, yes, I've lived in Michigan around the same area, yes.

6 Q Great. And what do you currently do for a job?

7 A I do not work. I work at home taking care of kids and my elderly parents.

8 Q Those are both -- those are both jobs in my book.

9 A Yeah.

10 Q So are you -- do you have any former law enforcement background or
11 military background?

12 A No.

13 Q Okay. Thank you very much. Are you a member of the Michigan Liberty
14 Militia?

15 A The Michigan Liberty Militia doesn't really exist anymore, except for like in
16 title, so, I mean, I can't even remember the last time we ever even did anything.

17 Q Were you at one time a member?

18 A Yes.

19 Q And was the militia in existence between November 2020 and January 2021?

20 A Again, it was more like a title, not really, you know, doing anything, so I don't
21 consider that in existence, but you might.

22 Q Understood. So what drew you to, when it was still active, be a part of the
23 Michigan Liberty Militia?

24 A I believe we all have the constitutional right to defend ourselves, and I like
25 the community outreach they did. When there was a flood here in Michigan, they went

1 and helped clean up. When we had really cold weather, they -- we went out and gave
2 coats to the homeless and fed the homeless. When Flint made a call for clean water,
3 the militia went and delivered clean water.

4 Q Got it. So when did you actually end up joining?

5 A I don't recall, like years ago maybe, maybe 2017, maybe.

6 Q Understood. And just for one second, I think your phone and your
7 computer microphone might be on. Do you want to mute yourself on the computer just
8 so we don't have an echo?

9 A The mute button here?

10 Q Yeah. There we go.

11 A Got it. Sorry.

12 Q Perfect. That's okay.

13 How did you learn about the Michigan Liberty Militia?

14 A I'm trying to recall, I think the very first time I really even learned about
15 militias was in 2017. Sorry, I'm not good with dates. There was a rally that I held and
16 the militia came out and supported the rally.

17 Q What kind of rally was it?

18 A March for Trump.

19 Q Okay. And would you say that this militia supported -- this was the
20 Michigan Liberty Militia, correct?

21 A There was several militias there, if I remember correctly.

22 Q Do you remember the names of the other ones?

23 A I don't with certainty.

24 Q What was it, like Michigan Home Guard? Does that ring a bell?

25 A Home Guard was there, yes. Yes.

1 Q Okay. How about Michigan Lanterns of Liberty?

2 A I don't recall having them there, no.

3 Q Something called the Michigan Militia Corps of Wolverines?

4 A No, not that I recall.

5 Q That's fine. In terms of their -- were they there supporting
6 President Trump, then, at your rally?

7 A From my experience with the militia, I mean, of course, everybody has a,
8 like, leaning of what they believe in, but for the most part, when the militias come to a
9 rally it's to support freedom of speech for both sides.

10 Q So were there protesters at that rally then?

11 A I'm sorry, honey, I can't -- I can't hear anything.

12 Q I said, were there protesters at that rally?

13 A Yeah, absolutely. We received several threats, yes.

14 Q Understood. So when you did join the Michigan Liberty Militia, was there
15 like a formal process you had to go through to become a member?

16 A No.

17 Q All right. No dues, anything like that?

18 A No.

19 Q And do you know who leads the group, or led the group?

20 A I'm sorry, did I ever lead the group?

21 Q No. Do you know who is the leader of the group or who led the group?

22 A Phil Robinson, I believe. I -- that's always been my assumption of it.

23 Q And who is Phil Robinson?

24 A A patriot that I've been friends with for quite a while.

25 Q What does he do for a living?

1 A I couldn't tell you.

2 Q Okay. Do you know --

3 A I don't know.

4 Q Do you know how or why he founded the Michigan Liberty Militia?

5 A I don't know.

6 Q Do you know how many people were in the militia?

7 A I couldn't give you a certain number.

8 Q That's fine. Did you -- did you, yourself, have any, like, title in the militia?

9 A It's kind of like a running joke, everybody called me Commander Honey

10 Badger.

11 Q What does --

12 A That's not just that militia, like everybody calls me Commander Honey

13 Badger.

14 Q So who is everybody?

15 A Patriots across the State, I guess. It's kind of like a nickname.

16 Q Why did you get that nickname?

17 A Somebody gave it to me. I think Phil was the first one to call me Honey

18 Badger.

19 Q Was there any reason for it?

20 A Because I'm little and fierce.

21 Q Understood. But you said, you know -- you said groups across the State call
22 you Honey Badger. How -- which groups are you talking about?

23 A Like people across the State. I couldn't -- there's not a specific group. It's
24 kind of just, like I said, a nickname that I got from, you know, being outspoken.

25 Q Okay. So are there other militia groups then that you associate with or

1 have associated with?

2 A Maybe there's Genesee -- God, I don't even know their real -- the full name.
3 Genesee Volunteer Militia, you know, Home Guard. I've never really gone to, like, any
4 formal meetings or, like, really gatherings of things like that. I mean --

5 Q So what would you say -- why would you say you associate with them, or
6 how do you associate with those groups then?

7 A Why would I say associate with them, could you clarify? I'm kind of
8 confused.

9 Q Like you mentioned that those two groups are ones that, you know, might
10 call you Honey Badger. So I'm wondering like, what is your connection to those groups?

11 A I just have been to, like, a lot of rallies and protests and things and met, you
12 know, hundreds and thousands of people across Michigan.

13 Q And these militias are some of the ones that have shown up at your rallies?

14 A I mean, I've only personally held like two rallies, but I couldn't say for certain
15 which groups showed up at my rallies or not. It's been years.

16 Q Okay. I guess, what, in your mind, made the Michigan Liberty Militia a
17 militia?

18 A Well, you know, traditionally the militias in our country have been more of a
19 social group than anything. So to me, it was more just like, you know, I like what these
20 people were doing. When their neighbors needed their help they, you know, they ran.
21 Like it's like, Okay, there's a flood, hundreds of people lost everything they had, and the
22 militia came out and cleaned up after the flood. There's, you know, a rally going on, no
23 matter what side it was, the militia were there to make sure that things went peacefully.
24 I mean, they've protected both Republicans and Democrats in that kind of, you know,
25 aspect.

1 Q Does the term "militia," though, have any sort of connection to firearms or
2 military training in your mind?

3 A I suppose it does, but, I mean, in my mind, every American citizen is a militia
4 member. Everyone has the right to protect themselves and their country, so that wasn't
5 the hugest part to me. That wasn't like what had drawn me to it.

6 Q All right. But, I guess, then how, in your mind, what is the difference
7 between the militia and like government services that are meant to respond to floods or
8 to protect people's free speech rights?

9 A Because they don't do it a lot. I mean, I'm just being honest. When we
10 had the dams break here in Michigan, those people didn't get any help from the
11 government. It was the militia that was out there helping.

12 Q Does the Michigan Liberty Militia coordinate with government entities, or
13 work with anyone in law enforcement to do these things?

14 A I can tell you that I have heard -- like I haven't been participating in setting
15 up the militias being at rallies or anything like that, but I've heard they do contact the
16 police departments to let them know they're going to be there.

17 Q All right. And is that sort of the same thing, when there's an environmental
18 disaster, they'll coordinate with government agencies?

19 A Yes, they'll let the police know that they're going to be out there helping,
20 yes.

21 Q All right. Were you aware of how the Michigan Liberty Militia or other
22 militias across Michigan communicated with one another, like, did they use messaging
23 apps like Signal or Telegram, or primarily, Facebook or anything like that?

24 A My communication with them was like primarily through Facebook, and, you
25 know, I'm not as deep into the militia, so I don't know.

1 Q Understood.

2 A Maybe -- yeah, I don't -- I don't know for certainty. I couldn't give you a
3 certain answer on that.

4 Q That's okay. I'm going to go through a -- the names of a couple of possible
5 militia groups, and asking if you know if the Michigan Liberty Militia, you know, worked
6 with these groups at all, so --

7 A Okay.

8 Q Capital City Militia?

9 A Not to my knowledge. I don't know.

10 Q American Patriot Council?

11 A I think so, but, again, I -- I wasn't involved in that, so I --

12 Q Does the name --

13 A I'd assume so.

14 Q Does the name Ryan Kelley ring a bell for you?

15 A Everybody -- yeah, everyone knows Ryan Kelley.

16 Q Okay.

17 A Yeah.

18 Q And do you know that he founded the American Patriot Council?

19 A I know he was sort of like -- I guess, I assumed he was like the leader of the
20 Patriot Council. I couldn't tell you for certain if he founded it. I don't know.

21 Q Okay. But do you think that Ryan Kelley worked with the Michigan Liberty
22 Militia at all?

23 A I've seen pictures of, like, Phil and the guys that were with that. I couldn't
24 tell you for certain.

25 Q Understood. Guardians of Freedom Michigan?

1 A I'm sorry, what was that?

2 Q Guardians of Freedom Michigan.

3 A That doesn't even ring a bell. I don't know.

4 Q Have you ever heard of the Boogaloo Boys?

5 A Yeah, everyone has heard of the Boogaloo Boys. They're crazy, yes.

6 Q So did they ever work with the Michigan Liberty Militia?

7 A Not to my knowledge.

8 Q Great. Have you ever heard of Three Percenters?

9 A Yes.

10 Q Do you know if the Michigan Liberty Militia worked with any Three
11 Percenters or any Three Percenters were members of their group?

12 A I -- I couldn't say for certain. I don't know. I'm assuming, because Three
13 Percenters is a pretty big thing all over the country, but I -- I don't know for certain.

14 Q Understood. Thank you.

15 [REDACTED], I think I might turn it over to you now.

16 BY [REDACTED]:

17 Q Great. Hi, Ms. Johnson, thanks so much for being with us today.

18 A Uh-huh.

19 Q I want to ask about a couple of events in Michigan from early 2020. Can
20 you hear me okay?

21 A Okay. Yeah. My -- it's my phone. My signal is not the greatest.

22 Q Okay. No worries. You just tell me if you can't hear a question that I have
23 and I'll repeat it.

24 A Sure.

25 Q Were you involved in the April 15, 2020, Operation Gridlock event around

1 the State Capitol?

2 A I attended it, yes.

3 Q Did you help organize it?

4 A Not like officially. I told people about it, but I didn't, like, officially help, you
5 know, organize it.

6 Q Got it. And were you there just as an individual or as part of the Michigan
7 Liberty Militia?

8 A Oh, as an individual. I don't -- I don't know for certain if they even went to
9 that. I don't know. Maybe. I don't know.

10 Q Got it. So is it fair to say you didn't have a role in the actual event, just as a
11 participant?

12 A I just participated.

13 Q Okay.

14 A I didn't like -- I wasn't part of the official like, I don't know, quote/unquote,
15 "organizers" of it.

16 Q Got it. Can you give me a sense of kind of what the atmosphere was like in
17 terms of people's views of Governor Whitmer and what was happening in Michigan at the
18 time?

19 A I mean, obviously, people were upset. People were upset. My view of
20 the events that day is there was just a lot of people who were expressing their First
21 Amendment right to protest when they're upset with the government. I didn't see any
22 violence or anything like that.

23 Q What were they upset about?

24 A I believe it was the emergency lockdowns. There's a lot of protests that
25 goes on. There's a lot of events. So I believe that was the, like, central issue of that

1 protest.

2 Q Uh-huh. Did you hear people threatening Governor Whitmer at that
3 event?

4 A Threatening her? I can't -- I don't -- I don't remember that much in detail.
5 I don't think so. I don't know. It was a long time ago.

6 Q Okay. Were you at the April 30th event that was at the State Capitol in
7 Michigan?

8 A Yes, I was.

9 Q Who organized that event?

10 A I believe that was Ryan Kelley's group that organized it. And we, you know,
11 encouraged people to go inside and be vocal about their objections to what was
12 happening.

13 Q Got it. Why was it important to go inside?

14 A I'm sorry, could you repeat? My phone is being really junkie right now.

15 Q That's okay. Why was it important to go inside the Capitol?

16 A We always go inside the Capitol, so it was kind of, like, it's something we
17 normally did and to, you know, be very vocal about their -- people's, you know,
18 disagreement with what the government was doing. I don't -- I don't know.

19 Q What were you -- I'm sorry, I don't understand what the -- what the -- can
20 you explain what the protest was about?

21 A April 30th. I believe, if I remember correctly, it was about the vote to give
22 Whitmer an extension on emergency powers, if I recall correctly.

23 Q Got it. And were you armed?

24 A No, I wasn't.

25 Q Were people you knew armed?

1 A There was a lot of people there armed. We -- it's not a -- it's not like
2 a -- and it might seem weird to you, but it's not a weird or out-of-place, like, thing to have
3 guns in the Capitol. We've had probably dozens of protests where we carry our guns.

4 Q Okay. But help me understand why it's important to carry guns inside the
5 Capitol Building?

6 A It's just our right to carry our guns. I --

7 Q Were you sending a message?

8 A I'm telling you from, like, my point of view, I couldn't speak for other people,
9 but it's just kind of our right to carry guns. I mean, that's -- it always happens. It's
10 nothing out of place. It's nothing, like, different.

11 Q Well, let me ask --

12 A I don't --

13 Q -- what message do you think it sends to carry weapons inside the Capitol
14 Building?

15 A What message does it send?

16 Mr. Dulan. If I could interrupt just for a moment. You're asking my client to
17 read the minds of other people. She already stated that she wasn't armed that day.

18 BY ██████████:

19 Q Okay. Do you support people going into the Capitol armed?

20 A I support people practicing their Second Amendment however legally they
21 can.

22 Q Including by going in the Capitol Building?

23 A Sure.

24 Q Okay. Do you know someone named Mike Sparks?

25 A Could you repeat that name, please?

1 Q Mike Sparks.

2 A Mike Sparks. I don't recall offhand.

3 Q He has a YouTube channel. He goes by Robitussin. Does that ring a bell?

4 A Maybe. I -- there's a lot of YouTube channels, and there's a lot of, like,
5 people -- I don't know. Maybe.

6 Q Okay. And you mentioned that Ryan Kelley organized the event. Can you
7 describe your relationship with Ryan Kelley, how long you've known him?

8 A How long have I known him, maybe late 2019 -- no, it's got to be like 2020.

9 Q Do you remember how you got connected with him?

10 A I'm sorry, I -- this -- I'm trying to think. I think he was holding a rally in
11 Grand Rapids, I think.

12 Q Do you remember what kind of rally it was?

13 A I don't.

14 Q Okay. Speaking of Grand Rapids, there was an event that Ryan Kelley
15 organized on May 18th in Grand Rapids. Did you happen to attend that?

16 A May 18th of what year?

17 Q May 18, 2020.

18 A May 18, 2020.

19 Q It was an event organized by Ryan Kelley, the American Patriot Council, in
20 Grand Rapids.

21 A Possibly. I mean, I know I did attend one in Grand Rapids, but I couldn't tell
22 you offhand if it was that specific one.

23 Q Okay. It was an event where Mike Shirkey was there, Dar Leaf was there.

24 A Oh, yes. Yes, I did attend that one.

25 Q Okay. Got it. Do you remember who organized that?

1 A Assuming it's American Patriot Council, so I'm assuming the group that Ryan
2 Kelley hangs with. I don't know how to put it other than that.

3 Q Okay. And it seems like you recognized Mike Shirkey and Dar Leaf. Do
4 you have --

5 A Yes.

6 Q Do you have relationships with either of them?

7 A I know Dar Leaf, not very intimately though. I know of him. I've had a
8 few conversations with him, but I don't consider him, like, a friend or anything like that.

9 Q Got it. And Mike Shirkey?

10 A I don't even know if I have actually spoke to the man, so I wouldn't consider
11 him, you know --

12 Q Okay. Do you remember what the event was about?

13 A I do not, to be honest.

14 Q Did you have any role in organizing the event?

15 A I don't think so, other than, maybe, like, posting, like, Hey, there's going to
16 be a rally, no.

17 Q Got it. Do you know the Null twins?

18 A I do.

19 Q Got it. How do you know them?

20 A They were part of Michigan Liberty Militia.

21 Q Got it. Would you frequently see them at events?

22 A Yeah, at first. I don't -- I think April 30th was probably the last, like,
23 event -- the first event in a while that I had seen them.

24 Q Got it. Do you still have a relationship with them?

25 A I haven't spoke with them for -- ever. I -- yeah, no, I haven't seen them

1 since probably April 30th.

2 Q Okay. Are you aware that --

3 A No -- no, well, I haven't spoken to them. I've spoken to their wife, like,
4 randomly.

5 Q Got it. Are you aware that they're suspected in the kidnapping plot of
6 Governor Whitmer?

7 A Of course, I'm aware.

8 Q Does that surprise you?

9 A Yeah, it actually really does surprise me. Bill and Mike are very huge
10 constitutionalists, so, yeah, it surprised me a lot.

11 Q Got it. What do you mean by constitutionalist?

12 A I mean, they know the Constitution. I believe in the Constitution as the
13 supreme law of the land.

14 Q Is that all that makes a constitutionalist? I think most people believe in the
15 Constitution.

16 A Right. I guess, I don't know. I don't know what other people think about
17 the Constitution. I would call them a constitutionalist because they're very
18 knowledgeable on it, I guess I'll say. I don't know. I'm not them.

19 Q Okay. But I guess I don't understand, because you described them as
20 constitutionalists, so I want to get a sense of what you mean by that term.

21 A Okay. So in my mind, in my thinking, a constitutionalist is somebody that
22 believes the Constitution is what governs our country.

23 Q Okay.

24 A I can't tell you what other people think a constitutionalist is.

25 Q Why do you think people who plotted to kidnap the Governor are

1 constitutionalists?

2 A I couldn't tell you what their mindset is, or why they did what they did, but
3 as far as I know, they haven't been convicted guilty of it yet. So I don't know. I
4 couldn't tell you. I know very little about that.

5 Q Ms. Johnson, come on, you described them as constitutionalists after you
6 told me that you knew that they were accused in the plot to kidnap Governor Whitmer.
7 I'm just trying to understand how you square the two things.

8 A Well, because I knew them and the relationship that I knew them. I didn't
9 even think it would even be capable of them doing, or being accused of something like
10 that. So perhaps how I knew them is different than what they are. I can just tell you
11 what I knew them as, and as what was presented -- how they presented themselves to
12 me.

13 Q Did you ever hear members of the Michigan Liberty Militia talking about
14 people like Governor Whitmer in kind of derogatory terms, talking about wanting to harm
15 her?

16 A I'm sorry, talking about what?

17 Q Wanting to harm Governor Whitmer?

18 A Not that I can think of.

19 Q You never heard anyone from the Michigan Liberty Militia talking about
20 harming Governor Whitmer?

21 A I -- I don't recall, no.

22 Q Did you participate in any other events with the Michigan Liberty Militia over
23 the summer in 2020?

24 A I don't recall.

25 Q You don't remember any events? Did you do anything with the Michigan

1 Liberty Militia over the summer of 2020?

2 A I don't recall. I -- I honestly don't.

3 Q Were you aware of any of the Black Lives Matter or antifa-related protests in
4 Michigan in 2020?

5 A I mean, there's been a few, yeah.

6 Q Did you attend any of those as a counter protester?

7 A I don't think so, no.

8 Q [REDACTED], can we pull up exhibit 24? All right. Maybe this will jog your
9 memory. This is from June 26, 2020. This is a Facebook post where you wrote, "I can't
10 say how much I love my militia family. I've been so stressed trying to make sure all
11 these rallies are planned and staffed."

12 A Yes. That's --

13 Q What rallies were you planning and staffing?

14 A Sure. I can actually explain that to you. So I was working with Katherine
15 Henry's Restore Freedom coalition, and she was asking me to organize their -- it was like a
16 petition drive. And the militia members were organ -- or meeting up at these different,
17 like, rallies and stuff, and so, I was just saying how much I -- this wasn't my picture. I
18 didn't take this picture, at least I don't re -- think I did. And I was saying, Hey, you guys,
19 thank you for being there to attend the rallies. So this wasn't something I attended.

20 Q So what was your role in the rallies?

21 A I was working as an event organizer, so, like, I would -- somebody would call
22 Katherine Henry and say, Hey, I would like to have a petition rally or something like that,
23 and I would say, Okay, Hey, this is the people in your area that you can get a hold of so
24 they can come and attend the rally.

25 Q Okay. And aren't these people members of the Michigan Liberty Militia?

1 A I think that's Home Guard.

2 Q And what was the event about?

3 A This one was for Restore Freedom petition. If I remember correctly, I'm
4 almost certain this was for Restore Freedom petition.

5 Q Okay. I'm not familiar with that. What is that?

6 A So what it was, Katherine Henry, who's a constitutionalist lawyer, was
7 putting up a petition to pretty much nullify the 1945 and 1976 bill, I believe.

8 Q Got it. Were there other events that you helped plan or you served as an
9 event organizer during that summer?

10 A For Restore Freedom, or --

11 Q Sure, or any militia-related events.

12 A Well, this wouldn't have been a militia-related event. That's why I'm kind
13 of confused, because this wasn't like a militia thing. This was a Restore Freedom thing.

14 Q I'm not sure I understand. They're not part of the militia that you're part
15 of, and you wrote, I can't say how much I love my militia family. Why isn't this a
16 militia-related event?

17 A I consider anybody who, I guess, is part of the patriot movement or the
18 militia to be family. I don't know what else to tell you about that. I'm -- I don't know.
19 I'm confused, too, because this isn't even a militia event. This was a Restore Freedom
20 event.

21 Q Got it. And who's part of the patriot movement?

22 A I can't specifically tell you, like, what groups are part of --

23 Q Just tell me what, you know, what makes someone part of the patriot
24 movement.

25 A I would say pretty much somebody who's -- I mean not even conservative,

1 but just wants to have general constitutional rights for the American people.

2 Q Got it. So if people don't identify as part of the patriot movement, do you
3 think that they want people to have constitutional rights?

4 A I guess that would be on a case-by-case basis. I mean, I've stood up for
5 Black Lives Matter freedom of speech before.

6 Q Got it. And when did you do that?

7 A June 20 -- no. I'm sorry. I would've looked up these dates if I had the
8 right -- I don't know, June 2020 maybe or 2021. No, it's 2020.

9 Q And what did you do? Did you go to an event?

10 A I saw a group -- I'm sorry?

11 Q Did you go to a Black Lives Matter event?

12 A No. I was downtown Grand Rapids cleaning up after Grand Rapids had
13 burned, and I saw two Black Lives Matter people peacefully protesting. And the cops
14 were going to arrest them, and I said, I had asked you before if people would be arrested
15 and you said it was up to your discretion. They were going to arrest these two Black
16 Lives Matter protesters who were peacefully protesting, and I said you can't arrest them
17 for using their freedom of speech.

18 Q Was that the -- did you go to any other Black Lives Matter events?

19 A That year? I -- are you asking that year?

20 Q Yeah. Yes. There were plenty of Black Lives Matter events in summer
21 2020. I asked you earlier, you said you didn't remember. You just mentioned one that
22 you went to. So I'm asking if you --

23 A No, that was not a Black Lives Matter event. There were two random
24 people peacefully protesting, and I wasn't there to attend that event or to
25 counter-protest that event. I was downtown cleaning up.

1 Q Okay. Any other events that you participated in in summer 2020?

2 A If you -- if you have a specific, like, thing you want to ask, that's fine. I don't
3 recall offhand. This was like 2 years ago.

4 Q Okay. Who do you think burned down Grand Rapids? You mentioned
5 that.

6 A Uh-huh. Who do I think burned down Grand Rapids? Well, they were
7 screaming Black Lives Matter while they were doing it, so I would assume it's part of that.

8 Q Got it. Why do you think Black Lives Matter was burning down Grand
9 Rapids?

10 A They were upset.

11 Q Okay. Did Michigan Liberty Militia, to your knowledge, were they involved
12 in counter-protesting or protecting counter-protesters at those events?

13 A That day I believe they did go by request of the Black Lives Matter. I don't
14 know. I wasn't involved with that. I was in Sanford cleaning up the dam damage.

15 Q Got it. Okay.

16 [REDACTED] I'll turn it back to you.

17 BY [REDACTED]:

18 Q Thank you, [REDACTED].

19 Ms. Johnson, I'm going to turn our attention to after the November 2020 election.

20 So just keep that --

21 A Okay.

22 Q -- timeframe in mind for going forward.

23 A Sure.

24 Q Following the 2020 election, did you believe that the election was stolen
25 from former President Trump?

1 A Not right away. Right away, I thought there was something going on
2 because, you know, we had heard people, you know, crying out that, Hey, they're not
3 letting us object to these ballots. Early on, I kind of figured it would, you know, fix itself.
4 I don't know what else to say to that.

5 Q So you -- when did you transition, then, from thinking it would fix itself into
6 thinking it had been -- that something wasn't right?

7 A Really, I kind of was under the impression that, you know, there's always
8 a -- I don't know how to put this. I figured that the Constitution would take care of it.
9 That's why I went to January 6th. I was there to give support to the States that were
10 going to object to the certification of the vote.

11 Q Right. So if you were supporting the States that were objecting to the
12 certification of the vote, that -- does that mean you thought something was wrong with
13 the vote?

14 A I did, yes.

15 Q And can you expand on that a little bit?

16 A I just thought, like, you know, there's just so much information out there. I
17 know in Michigan we had people who -- I mean, I had people I knew who were at the TCF
18 Center -- I want to call it Cobo Hall, because that's -- I guess I'm old enough, and that's
19 what it's always been called -- who were, like, I saw, you know, ballots coming in when
20 they weren't supposed to come in. We had people that were like we're trying to object
21 to these ballots that are so ridiculously, like, fraudulent, and they're not letting us.

22 Q And who are these people that were trying to object?

23 A Offhand, I can tell you Dawn Bede (ph), I believe her last name is, [REDACTED]
24 (ph).

25 Q Were these just concerned citizens, or did they have specific roles in --

1 A I couldn't tell you the specific roles. I don't remember. I don't recall. I
2 know they were -- so they must have been poll challengers or something like that. I
3 don't know.

4 Q And how are you connected to them?

5 A You know, I've known Don for, I don't know, a year or 2 maybe.

6 Q Okay. Did you yourself have any role in overseeing the election as it was
7 happening or challenging --

8 A No.

9 Q -- it after? Or -- so did you take part in any actions in Michigan afterwards
10 to challenge the vote?

11 A I don't have the -- I don't possess the authority to challenge the vote, I guess,
12 so I don't know -- I mean, I don't know -- I guess I don't understand what you're saying.
13 I'm sorry.

14 Q Sure. I'll rephrase. Were you part of any efforts in Michigan to secure a
15 recount of the vote?

16 A I attended some rallies, but I -- I don't -- you know, I was contacted
17 by -- gosh, I couldn't even tell you who contacted me. Somebody had contacted me and
18 said, Hey, the Trump lawyers are trying to gather information out of Michigan. As you
19 hear anything, send them to this number or something like that.

20 Q Why do you think that person reached out to you?

21 A I don't know. I guess because I'm a big voice in Michigan. I don't know.

22 Q Do you remember if you ever sent any information to that number?

23 A I don't -- I don't know. Because a lot of it was kind of, like, stupid stuff, like,
24 Oh, I've used a felt pen instead of a regular pen. I don't know.

25 Q So on that point, just to -- not to divert us too far, what did you consider to

1 be a stupid, in your words, complaint versus something with more substance?

2 A I'm sorry. I'm trying to think. Maybe, like -- I think somebody had -- I
3 don't know. I think somebody said something about their ballot wasn't accepted or they
4 couldn't vote because they didn't have a mask on. I don't --

5 Q Okay. But you don't remember if you sent any of those along to that
6 number that you were given?

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

8 Q And did you work at all with the Trump campaign after the November 2020
9 election in Michigan in any sort of challenge efforts?

10 A No, I don't think so.

11 Q Okay. And then in terms of the rallies you said you went to, was one of
12 them outside of the Michigan Secretary of State's house?

13 A The Michigan Secretary of State's house?

14 Q Yeah.

15 A No.

16 Q Okay. Do you remember where those protests that you took part in were?

17 A I think one was outside the TCF Center and one was outside Lansing maybe.

18 Q Okay. Would you -- were you part of a Stop the Steal organization in
19 Michigan?

20 A An organization, no. No. I mean, I have Stop the Steal sweaters, but, no, I
21 wasn't part of the organization.

22 Q Were you part of any organization challenging the election results in
23 Michigan?

24 A I think the closest I ever got to being part of an organization was, like -- like,
25 maybe the Trump Unity Bridge, like --

1 Q But nothing specifically in Michigan related to challenging the election,
2 correct?

3 A I don't think so, no.

4 Q Okay. Thank you. And did you attend a rally in Washington, D.C. on
5 November 14, 2020, to support former President Trump?

6 A I believe that's the date, yes. I don't even remember the dates of the three
7 rallies, to be honest. I mean, I know January 6th, but --

8 Q Right. But you do -- you went to three of them then?

9 A Yes.

10 Q Okay. Did you have any organizational role for the November 14th rally, or
11 this -- the second one, December 12, 2020, did you have --

12 A No. I mean, I might have, like, told people about it and, like, maybe gave a
13 patriot or two \$20 bucks or something, but I didn't -- I wasn't part of the organization.

14 Q Right. Why did you attend those first two rallies in Washington, D.C.?

15 A I saw problems in the election, and I felt I had the right to speak on those
16 problems, to show my support of those problems.

17 Q Did you think something specific would happen after attending those rallies,
18 like what outcome were you hoping for after making your voice heard?

19 A I guess the outcome I was hoping for was to draw attention to election
20 integrity. You know, I certainly don't support a violent takeover of the government. I
21 actually preach against that all the time. You know, we have to do this according to our
22 Founding Fathers, and they taught us to be defensive, but not offensive.

23 I wanted to make sure that there was light shed on the problem, like, I said. I
24 have people who have told me, like, Hey, I was at the TCF Center, some fishy stuff was
25 going on. And at that point nobody was, like, looking into it. It was just a, these

1 people are crazy.

2 Q In terms of election integrity, was that in light -- did you want to shed light
3 on just the 2020 election or the issue more broadly?

4 A I mean, I would say election integrity is important no matter who wins.
5 What was her name -- after the 2016 election, Green, I think was her name, she was, you
6 know, gathering money to look into an audit of the election here in Michigan, and I -- I
7 didn't, like, come out screaming support of that, but I was, like, Hey, if we have a
8 problem, we should probably look into it.

9 Q And did you hear, let's say around the December 12th rally or so, so around
10 December 2020, had you heard reports that the 2020 election, by all accounts, was
11 incredibly secure and accurate?

12 A I mean, I heard that -- I heard it was incredibly secure and accurate, and then
13 I heard, no, that's not true.

14 Q So where did you hear that it was accurate?

15 A I couldn't tell you. It's 2020. Maybe, like, CNN or something. I don't
16 know.

17 Q Did you hear reports that William Barr, President Trump's attorney general,
18 that the intelligence services in the United States, and that courts who had looked at
19 these cases across the country all came out with similar conclusions that there was
20 nothing really wrong with the 2020 election?

21 A I mean, again, I heard counterintuitive reports. One says, Yeah, it was the
22 safest it's ever been, and then there was, you know, the Supreme Court hasn't even
23 looked at the evidence, so I heard both.

24 Q Did you know that the Supreme Court rejected Texas' challenge to the 2020
25 election on December 11, 2020?

1 A I heard, again, both. It was they rejected it, they looked it over, and then it
2 was, No, they didn't even look at it. They just rejected it. So --

3 Q Right. But I guess just in terms of weighing the sources, who's telling you
4 that they -- the stuff about, you know, the Supreme Court not looking at it, or that there
5 was a lot of fraud at that time?

6 A I couldn't give you a specific name, I guess.

7 Q Were you hearing it on social media?

8 A Probably social media, a lot of YouTube, so both, you know. I don't know.
9 I couldn't specifically say, like, this person told me this. I don't know.

10 Q Did you follow President Trump on Twitter or Facebook at that time?

11 A I don't really use Twitter all that often. I think I have an account. But I
12 don't really use it all that often.

13 Q What about Facebook?

14 A I think so. I don't think --

15 Q Were you getting --

16 A I don't know.

17 Q Sorry. That's my fault.

18 A That's okay.

19 Q Were you getting information claiming that the 2020 election had
20 been fraud -- was fraudulent from former President Trump?

21 A Like, from him? No.

22 Q Not, like, -- not him speaking to you. Through social media.

23 A I was going to say, who do you think I am? Maybe through, like, you know,
24 a lot of people screen shot stuff and then, like, share it, so maybe. Like, I said, I can't -- I
25 don't -- I don't have a great memory as it is, and, like, this was, like, a lifetime ago to me,

1 so --

2 Q And for those two rallies, did you go to them with anybody else?

3 A I went to three rallies, so --

4 Q Yeah, I'm sorry, I'm just focused on the first two.

5 A Yes, I -- I went with two of my friends to the first one, and then I believe it
6 was the second one I went with the Unity Bridge team.

7 Q And can you explain what the Unity Bridge is?

8 A It's this great big, giant, obnoxious bridge that just says "Trump Unity."
9 They kind of just go all over the country, you know, playing music, making patriotism fun.

10 Q Is that, like, a group, or is it an individual's bridge, like, --

11 A It's -- Rob Cortis runs the Trump Unity Bridge, but there's always different
12 people traveling with it. So I don't even know if I could specifically say who was there on
13 the different dates.

14 Q Got it. Did you see any violence at the November 14th or December 12,
15 2020, rallies in Washington, D.C.?

16 A The December rally, I want to say there was one of them where I was out by
17 Harry's and, like, a Proud Boy got stabbed. I didn't see it. I was kind of in the crowd
18 when it happened, but I couldn't tell you if that was December or January. I'm pretty
19 sure it was December.

1

2 [3:10 p.m.]

3 BY [REDACTED]:

4 Q It was December.

5 A Okay.

6 Q What were you doing in that crowd near Harry's?

7 A Because Harry's is just kind of the place where everybody goes when
8 everybody's in town. I mean, I go there when I'm just there.

9 Q Do you know any Proud Boys?

10 A Not personally, but I can tell you me and the Proud Boys don't get along very
11 well so.

12 Q What do you mean?

13 A Well, you know, there's situations where they get hyped up and they want to
14 just like throw bodies around, and I don't agree with that.

15 Q Have you ever had like an altercation with a Proud Boy?

16 A Oh, yeah. Oh, yeah. There's been several times where I'm like, "You
17 gotta stop," and they won't stop. So yeah.

18 Q Where -- did that happen on December 12th?

19 A I want to say there was, like, an issue where I was in the crowd, and I was,
20 like, trying to figure out what was going on, and one of them grabbed me and, like,
21 pushed me. But I can't tell you if that was December 12th or not. I think it was.

22 Q Okay. Just stay on the Proud Boy topic, I'm going to share an exhibit with
23 you, exhibit 12, if I can figure this out again.

24 Exhibit 12 is one of the -- I know it's very small. I'll zoom in.

25 A Yeah. I can't see it.

1 Q It's a Facebook message you produced to us with RaeAnn Fortin and
2 yourself, if I'm pronouncing that correctly.

3 A I don't know.

4 Q This is before January -- this is around the time of January 6th. I believe it
5 was January 4th or so. You share information about Enrique Tarrío, who is the leader of
6 the Proud Boys, getting arrested January 4th?

7 A Yes.

8 Q And you have an emoji and: Sweating over here that we are next.

9 A Right.

10 Q What does that mean?

11 A I just don't, I mean, if we're honest here, I just don't feel like I have freedom
12 of speech anymore, so that was why I saying I'm sweating it over here because I don't
13 believe I have freedom of speech anymore.

14 Q What does freedom of speech have to do with Mr. Tarrío's arrest?

15 A Just that we didn't know why he was being arrested, and we thought it was
16 because he was there to attend the rally. I don't know. I guess that's what I was
17 saying with that.

18 Q Did you know he was arrested in part because he had guns in his car in
19 Washington, D.C.

20 A I didn't know that until later.

21 Q Okay. And I think you shared this with -- this information with some other
22 people, and I could pull up the chats if you want, but you were speaking to someone
23 named Tanya Pain (ph), and she said: We need him there.

24 [REDACTED] That's page 30 of the production you shared with me, Steve, if you
25 want to look at it?

1 The Witness. Sorry. I just turned my phone down. Sorry. I didn't mean to.

2 BY [REDACTED]:

3 Q Oh, do you want me to repeat the question?

4 A Yes, please.

5 Q Sure. Around the same time, you shared this information with someone
6 named Tanya Pain (ph)?

7 A Okay.

8 Q She said: We need him there.

9 Do you know why she said that?

10 A I don't.

11 Q Okay. And you also shared this information with someone named Jack L.
12 Mossimo, Sr., (ph) who seemed to be alarmed by this news. Do you know why Mr.
13 Mossimo (ph) cared?

14 A I don't. I couldn't tell ya.

15 Q So, in your understanding, then, Mr. Tarrío was arrested for something to do
16 with freedom of speech?

17 A Like I said, at that moment, I don't think I knew. I couldn't tell you. I
18 mean, some of these screen shots, I didn't even find until I searched. I couldn't tell you
19 what I was thinking at that moment.

20 Q Understood. So, in terms of January 6th, do you remember when you
21 found out that the events would be happening?

22 A I don't specifically, no.

23 Q Do you remember a tweet by former President Trump, and again,
24 understanding you may not have been on Twitter, but people do share the sheen shots --

25 A Yeah.

1 Q In which he said, "There will be a protest in Washington, D.C., on
2 December 19, be there, will be wild"?

3 A Yes. I do remember seeing that, yes.

4 Q Did you re-share that post with other people?

5 A Did I re-share it? Probably. I don't know.

6 Q Here, we'll show you exhibit 5. Exhibit 5 is a Facebook post you made
7 December 19th only a few hours --

8 A Okay. There we go.

9 Q There you go. And you say: Word is that President Trump has called for
10 all patriots to march to D.C. on January 6th. Are you ready to answer the call of the
11 President?

12 A Okay.

13 Q What did you think the President was calling you to Washington, D.C., to do?

14 A To let our voices be heard about the election.

15 Q And what did you think your voices being heard would do?

16 A To be honest, probably not much. But again, we wanted the State
17 to -- wanted to be able to object to the election, to object to the election.

18 Q Weren't there people who were going to object to the election anyway?

19 A I'm sorry, what?

20 Q Couldn't someone have objected to the election regardless of this protest?

21 A Probably.

22 Q Okay. And where did you get the idea that President Trump had called for
23 all patriots specifically to come to Washington, D.C.

24 A I don't know. I just call people that stand up for the Constitution patriots.
25 I don't know.

1 Q Do you think certifying an election that was, by all counts, accurate
2 considered following the Constitution?

3 A I'm saying that there was problems that people were sharing, and people
4 went to let their voice be heard about that. I mean, it's freedom of speech.

5 Mr. Dulan. I would just like to object to the phrasing of "by all accounts," [REDACTED].
6 [REDACTED] Understood.

7 Mr. Dulan. All is a little too broad.

8 BY [REDACTED]:

9 Q By the government agencies that evaluated the election.

10 A I mean, honestly, I guess, to me, like, I don't have to have a reason to say,
11 like: Hey, I don't agree with this.

12 And I can have -- I can go and voice my opinion whether I agree with you or not or
13 you agree with me. It was to me to go and voice my opinion.

14 Q I understand that. I'm not quibbling with your freedom to have your ideas.
15 I'm wondering why the phrase "patriots," and you said that's your term for people who
16 support the Constitution, so my question was, in your mind --

17 A Okay. If you love the country and you love the Constitution, you are a
18 patriot to me. It seems to be a repeated thing, like what is a patriot? Well, do you
19 love your Constitution? Do you love your country? You're a patriot. I don't know.

20 Q Do you think President Trump was calling people who love their country and
21 who love their Constitution and who think, or at that time, who thought the election was
22 for Joe Biden, do you think he was calling them to Washington, D.C., on January 6th?

23 A I guess that would be their personal -- I can't tell you what other people
24 thought or --

25 Q Sorry. I'm asking in your opinion because you're saying a patriot -- the

1 definition of patriot you gave me is someone who loves their country and loves the
2 Constitution?

3 A Right.

4 Q And, in this post, you say the President called for all patriots to march on
5 Washington, D.C., on January 6th.

6 So my question to you, in your view, not asking you to tell me what other people
7 think or know, was President Trump calling Biden supporters or Biden voters who do
8 support the Constitution and their country to Washington, D.C., on January 6th?

9 A Well, I suppose if they thought that it was necessarily for them to be there, if
10 they thought that there could have been a stolen election, I guess, yes. I mean, again, I
11 was on the other side where my -- the person that I elected for or I voted for in 2016, he
12 won, but I was still in support of, hey, if we have a problem, we should look at it when Jill
13 Green or Jill Stein, something like that, when she called for an audit. I guess, in my
14 opinion, if they thought that there was a problem, then, yes, he was calling them too.

15 Q For the one -- so this take, then, "all patriots" actually means people who
16 thought there was a problem with the 2020 election?

17 A Sure.

18 Q Is it possible to be a patriot who didn't think that there was a problem with
19 the 2020 election?

20 A I mean, I guess. I mean -- you know, to me, like I said, I guess it's a personal
21 decision. I don't know. I don't know what you're asking me, I guess.

22 Q I'm just asking -- we're trying to clarify the "all patriots" part here.

23 Is it possible for a patriot to not in that time period to have believed that the 2020
24 election was fair?

25 A I guess. That's their personal belief. So, yes, I guess.

1 Q You would consider somebody, so long as that person loved the country and
2 supported the Constitution, to be a patriot, even if that person did not agree with
3 President Trump's view on the 2020 election?

4 A I mean, I guess everybody's allowed their own view.

5 Q I'm asking, would you consider that person to be a patriot?

6 A I guess. It's my personal feeling, I guess. But, yeah. I mean, like, if you
7 don't believe there was election -- the election was rigged or messed with, then, sure.

8 Q Thank you.

9 And then, just about this last sentence, "be there, will be wild," what did you take
10 that to mean?

11 A I don't know. Be there. Be wild. For me, I guess, I went into it thinking
12 it was more going to be a celebratory thing, right? Like, we were going to have the
13 States' voices heard. That's what I went into it to. I couldn't tell you what Trump was
14 thinking when he said "be wild." I couldn't tell you what the million other people
15 thought to be wild. To me, I was thinking more of a celebratory thing.

16 Q Ms. Johnson, I'm not -- just to be clear, we're never going to ask you to try to
17 step into the minds of other people.

18 A Okay.

19 Q But sometimes we're going to ask for your impression of what other people
20 said.

21 A Sure.

22 Q I'm sorry if I wasn't clear, which is incredibly possible.

23 A I'm, like, confused because I'm, like, I don't know.

24 Q When you read "be there, will be wild," do you -- what did you take that to
25 mean?

1 A What did I take that to mean? It was going to be a celebratory thing, like,
2 or we were going to see some justice in the little bit of -- the least of it, even if it was
3 acknowledge, hey, maybe Michigan was stolen, at least we could have fixed the system, I
4 guess.

5 Q In the celebratory fashion, were you hoping that States would object and not
6 certify the vote for President Biden?

7 A Was I hoping Pence would object?

8 Q In some way, shape, or form. You said you were expecting celebratory, so
9 did you hope in some manner or fashion the election would not be certified for President
10 Biden?

11 A Yes.

12 Q And you just mentioned Vice President Pence.

13 What did you understand his role to be on January 6th?

14 A On January 6th, let me think. So, from my understanding, is he could have
15 objected some sort of way to the -- to the acknowledgment of the votes so we could get
16 recounts or we could find a path to ensure that either way it was a legitimate election.

17 Q So it was not -- was it your hope that, after January 6th, President Trump
18 would get inaugurated on January 20th?

19 A I mean, obviously, I support Trump. So, yeah, I guess it was my hope that
20 he would be, yes.

21 Q Did you expect if Congress did not certify for Joe Biden on January 6th, that
22 President Trump would emerge as the President again for the second term?

23 A I'm sorry. Could you repeat that? It's my phone.

24 Q That's okay.

25 Was it your expectation, then, that if Congress did not certify for President Biden

1 on January 6th, that President Trump would take a second term starting on January 20th?

2 A I guess my expectation, my hope, was that, yes. I mean, obviously, I want
3 Trump as my President. But I think for me, it literally was the fear of not having a fair
4 and transparent election.

5 Q Understood. So, in terms of how you got to Washington, D.C., did you
6 drive or fly?

7 A Which time?

8 Q January 6th. From here on out, we're talking about January 6th. I'm
9 sorry.

10 A I don't know why I said "which time" because I drove all three times. We
11 drove.

12 Q Okay. Sorry. Just for a moment, we've been going for about an hour
13 here. Do you need a quick break or anything like that?

14 [REDACTED] Steve, you good?

15 Mr. Dulan. I could use an old man restroom break.

16 [REDACTED] Do you want 10 minutes or 5 minutes?

17 Mr. Dulan. Five is fine for me.

18 [REDACTED] Is that good, Ms. Johnson? We'll take a 5-minute recess and come
19 back at 3:32?

20 The Witness. Okay.

21 [REDACTED] See you in 5.

22 [Recess.]

23 [REDACTED] Back on the record 3:37 p.m. for the deposition of Audra Johnson.

24 BY [REDACTED]:

25 Q Ms. Johnson, for January 6th, did you sponsor people to go to Washington,

1 D.C.?

2 A I had donations given to me, like, for 20, 30 bucks, and then, like, people I
3 knew that were going, I gave them the money for gas or like meals.

4 Q Why did people give you money to spread out?

5 A Because they knew I was going.

6 Q But why did they know you would be someone to distribute that money?

7 A Because they knew I was going, and they knew I could get it to people I knew
8 was going, I guess.

9 Q So were you organizing people to go to Washington, D.C.?

10 A I, like, helped get news out about buses that were leaving out of Grand
11 Rapids, and like I said, I gave money to, like, a couple people for, like, a meal because we
12 all know how expensive food is in D.C.

13 Q Tell me about it.

14 Do you know who organized those buses?

15 A I sent over, like, screen shots of, like, the information I was given. I know
16 like Meshawn Maddock organized one. Other than that, I don't think I could give you
17 personal names without looking at a --

18 Q That's okay. In one of the messages you provided to us at page 6 of the
19 production, a Darlee -- and I'm sorry if I'm mispronouncing her last name -- Doetzel,
20 D-o-e-t-z-e-l, said that the Trump campaign pays for the bus.

21 Was it your understanding that the Trump campaign was paying for the bus?

22 A I don't know who was paying for the buses. Like I said, I provided whatever
23 information I was sent. I don't know who paid for the buses.

24 Q Do you have any idea of how many buses ended up going to Washington,
25 D.C., from Grand Rapids?

1 A I don't think they were all from Grand Rapids. From my understanding
2 there was, like, maybe six. Maybe six. It was kind of just like people sent me
3 information, and then I put the information out there, so I couldn't tell you how many
4 buses.

5 Q That's okay.

6 A I was told at one point there was like four at one point I put out there.

7 Q And those were all through Meshawn Maddock?

8 A I don't know who they were all through. I know like, I said I know for sure
9 Meshawn organized some because she put it out there she was organizing them.

10 Q Understood. And yourself, you mentioned you drove. So I take it you
11 weren't on one of those buses?

12 A No. I went with the Trump Unity Bridge.

13 Q Okay. How many cars drove with you?

14 A I'm trying to think. There was -- and I'm sorry. I'm trying to remember
15 correctly. There was at one point one of the days -- I could not tell you to save my life
16 which day it was, but it was either November or December where we had traveled
17 with -- oh god, what is the name of it. It's like a women's conservative organization.

18 Q Women for America First?

19 A Yes. Yes. So we had followed them -- I want to say November, but I really
20 don't know.

21 Q That's okay. You were following their bus tour?

22 A Yes.

23 Q Okay. I think, for January, though, and I could pull it up if you want, you
24 mentioned in one of your posts that the Trump caravan was on its way to Washington,
25 D.C.?

1 A Uh-huh.

2 Q Why did you use the word "caravan"?

3 A I think it because we were meeting -- like every stop, we would stop, and
4 then we would meet more patriots that were on their way to D.C. so in the, like, Trump
5 caravan if I was referring to the Unity Bridge team, I guess you'll say, there's the Unity
6 Bridge. There's a truck. There's an ambulance, and then there's a, like, white cargo
7 van.

8 Q And was this a preplanned route? You mentioned stops.

9 A The one when we followed the Women for America First, yeah, that was a
10 preplanned route. I don't -- I couldn't tell you where we stopped in January, though.

11 Q Okay. So, in January -- but it was your understanding you made stops and
12 picked up additional cars or whatever along the way?

13 A I don't think it was planned though. I think it was just kind of like we were
14 traveling down a major highway, and more cars joined. I don't think it was planned. I
15 don't know.

16 Q Do you remember stopping off the highway and people joining your group
17 along the way?

18 A Briefly. I don't think it was, like, a planned thing, though.

19 Q Okay. I'm just going to quickly show you an exhibit.

20 A Sure.

21 Q You let me know if you've seen these things before. These -- I know you
22 don't have Twitter, but -- can you see it?

23 A Yeah.

24 Q Okay. So these are some tweets by someone named Dr. Enoch that show
25 routes, including one from Michigan, to Washington, D.C., for January 6th?

1 A Sure.

2 Q And if you scroll down a little more, this is from close to Grand Rapids, looks
3 like it might have left -- hard to tell exactly -- East Lansing, and you see stops along the
4 way?

5 A Sure.

6 Q Does this look familiar to you?

7 A It doesn't. Maybe I should explain, though, like, Rob Cortis, who runs the
8 Trump Unity Bridge, he doesn't tell anybody really what the plan is. We just get in the
9 cars and go. So maybe.

10 Q Did he talk about, you know, a caravan route or anything like that on
11 January 6th?

12 A Not that I remember.

13 Q And did he talk about meeting up with other patriots along the way?

14 A Not that I remember.

15 Q Thank you.

16 In terms of January 6th, was it your expectation that there might be violence on
17 that day?

18 A You know, we've seen so much violence before, it's almost like a daily
19 expectation. I mean, I don't have to go to a rally to be threatened to get my butt kicked,
20 you know what I mean? So, I mean, I guess, at some level, yeah. There's going to be
21 violence. I mean, we've seen it before.

22 Q I'll show you another exhibit.

23 A Sure.

24 Q This is a -- and I apologize, again, this is my fault trying to work with
25 technology and making it bad --

1 A Sure.

2 Q This is a Facebook post by you on January 5th. You can see January 5th,
3 early in the morning. It's the Washington Monument. Talk about "a republic if you can
4 keep it," the same as Ben Franklin quote, and you say: Hold the line.

5 What did you mean by "hold the line"?

6 A Be steady. Be a voice for what you believe in. "Hold the line" to me is
7 just a traditional -- be steady, be brave, be patriotic.

8 Q Here, you mentioned holding the line after talking about a republic if you can
9 keep it.

10 Were you afraid, after January 6th, the American Government wouldn't be, I
11 guess, a democracy anymore or a republic?

12 A Well, I mean, I'm going to be honest with you, people like me are very often
13 not able to be honest about how they feel. They're not able to have their freedom of
14 speech without being attacked, sometimes physically in the street. So, yeah. It does
15 terrify me that we have come to such a division in our country that we can't have
16 opposing opinions. So, yeah, I am terrified of that.

17 Q So, in terms of January 6th, specifically, because this is a post from
18 January 5th and it mentions hold the line and what kind of government, can you keep
19 your republic; were you worried that, after January 6th, the American Government might
20 not be a republic anymore?

21 A Yes. Yes.

22 Q And why were you worried about that?

23 A Why was I worried about that? Again, I would have to go back to what
24 conservatives have faced the last, I don't know, 7 years. And it kind of came up to, well,
25 if we can't even feel like we have a free and transparent election, then that terrifies me

1 that we might not have a republic.

2 Q Were you concerned that, if Congress certified the vote for President Biden,
3 that we wouldn't have a republic anymore?

4 A I think I was more concerned about the fact that I couldn't trust that my
5 election wasn't stolen.

6 Q Even if Congress certified the vote and even if -- even though all of these
7 government organizations had said that there was nothing wrong with the election?

8 A Well, I can disagree with them. But yeah.

9 Q Right. No. Not saying you can't disagree with that. I was just asking the
10 question.

11 A Right. Right. Yeah.

12 Q So, to be more direct about it, even if Congress certified the vote on
13 January 6th, would you still have been afraid that the -- we wouldn't have a republic
14 moving forward after that?

15 A Yes.

16 Q Understood. Thank you.

17 So, I guess, what did January 6th, then, mean to you? Just a very broad question
18 there.

19 A Uh-huh. Well, again, January 6th to me meant a chance for me to come
20 and voice my opinion in the Capitol of my country, that I believed we had a problem. I
21 believed that a lot of what was going on with the election wasn't a fair and free and
22 transparent election. I was there to -- I don't know. I guess, celebrate the right to be
23 able to do that as a free American and also to give support to the States that were going
24 to object to it.

25 Q Were you there to see President Trump's speech at the rally -- at the Ellipse?

1 A At the Ellipse? Well, I mean, I didn't even stay for the whole speech. I
2 went back to my hotel. So, yeah, in a way, yes, I was going to see President Trump's
3 speech, but, I mean, I love Trump, but he gets kind of winded sometimes, and I have the
4 attention span of a squirrel so.

5 Q Why did you go back to your hotel?

6 A It was kind of cold, and I was wearing the wrong shoes, and my feet were
7 hurting.

8 Q Where did you go after the hotel?

9 A We were walking on our way back to the hotel, and somebody had said:
10 Hey, there's going to be a like mini rally at the Capitol. We were told that there were
11 permits. And we said, okay, we're gonna go back to the hotel. To the best of my
12 recollection, we went back to the hotel, and then we went up to the Capitol.

13 Q Were you aware of any events at the Capitol before January 6th?

14 A Like a preplanned planned or something?

15 Q Not -- sorry. Let me be more -- better question. That was a bad question.

16 Were you aware of planned speeches or rallies or protests at the Capitol, putting
17 aside, you know, people going into the Capitol on January 6th?

18 A No, not people going into the Capitol. Like I said, a lot of this is word of
19 mouth. So it was like we were walking back, and they were like: You guys got to go to
20 the Capitol.

21 And I specifically remember going: Do they have permits at the Capitol?

22 And they're like: Yeah, there's permits; it's fine.

23 So we went back to the Marriott Hotel. Stayed there for a little bit, warmed up,
24 and went to the Capitol.

25 Q I'm going to try to play a video for you.

1 A Yup.

2 Q We will see how this works. Can you see a woman in a blue hat?

3 A Yes.

4 Q I'm going to hit play, and if you can't hear anything, just let me know right
5 away, and I'll try to --

6 A Absolutely.

7 [Video shown.]

8 BY [REDACTED]:

9 Q For whatever reason, I couldn't hear it on my end.
10 Could you hear it?

11 A No. I heard something about there is an event at the Capitol. But I don't
12 recall ever hearing that. I don't know.

13 Q Was that your voice that you heard say that?

14 A No, that was not my voice. No, that was not me. Actually, that kind of
15 sounded like Meshawn, but I don't know.

16 Q Okay. Were you around the Trump Unity Bridge on January 5th?

17 A Possibly. Like I said, I traveled with them, but we stayed in different hotels
18 that time. So I was at the Marriott. I think they were at the -- not Radisson. Maybe
19 like Residence Inn.

20 Q No problem. You just -- to the best of your recollection, you don't
21 remember hearing about the --

22 A I don't. I don't.

23 Q Okay. So, I guess, then, you head to -- you go to the hotel, you come back,
24 and you go to the Capitol?

25 A Yeah.

1 Q Or go that way. What are you seeing as you're walking that direction?

2 A Sure. So we're all like -- we're walking we're going up there. I have to
3 explain: I'm a very short person. I'm like 5-3. So we get up there, and we're in this
4 massive, like, group of people, and everything is surging forward, and everything's coming
5 in. So I was like: Okay, I cannot be in this crowd. I'm going to get squished.

6 So we -- we go over to the side, and there's like a bench right there. I sat on the
7 bench, and I was like: Okay, what are we doing here? There's nobody speaking.

8 My friend called, and he said: Hey, the National Guard's coming in, right?

9 And I'm like: Okay, so, if the National Guard's coming in, we got to get out of
10 here, you know?

11 I don't know. I did a video that I later took down because I realized I was talking
12 complete crap, and I had no clue what I was talking about, went back to my hotel room,
13 got locked up in my hotel room. Well, I stopped at the Unity Bridge that was by -- what
14 is that street? There's a street by Harry's. It kind of goes up, and then there's the
15 Trump Hotel. Like 11th? Is that right.

16 Q I'm not sure.

17 A I don't know. Stopped there, you know, and then --

18 Q Do you remember what time you started walking towards the Capitol?

19 A I honestly don't.

20 Q Okay. Let's play -- I think this is the video you just referred to?

21 A Sure.

22 [Video shown.]

23 BY [REDACTED]:

24 Q Could you hear that video?

25 A Yes.

1 Q And was that the video that you recorded that you later took down off of the
2 internet?

3 A Yeah. Because, like, I realized that, like, again, it was a hyped-up moment.
4 I realized that, like, no, they shouldn't have torn barriers down if that's what they did.
5 So, yes, I deleted it. But that was way before anybody contacted me from January 6th
6 Committee, so I wasn't trying to, like, hide it. I just don't have access to it.

7 Q I understand that. I was certainly not accusing you of trying to hide it.

8 Do you want to expand a little bit more? Besides the barriers, was there
9 anything else about it that you now think is -- did you say "absolute crap" or something
10 like that?

11 A I mean, it's just the truth is I don't know who -- like people kind of
12 sometimes trust me to report what I see. And the truth is I don't know, right? I didn't
13 see those barriers get torn down. I didn't see people break into the Capitol. I didn't
14 see who it was. So I didn't feel like morally and ethically it was something I should have
15 kept up.

16 Q You said, you know, that this isn't BLM; this isn't antifa; this is God-fearing
17 America-loving citizens who have had enough.

18 A Right. Right, which is absolutely shit after I thought about, like, no that's
19 not how God-fearing American citizens act.

20 Q Right. I guess when did you come to that realization?

21 A I don't even know. Like, honestly, until Michigan Tea put it up, I totally
22 even forgot about it.

23 Q Were there days after January 6th where you still felt that the people who
24 had entered the Capitol were justified in what they did?

25 A I don't know. A month maybe, I don't know. Like I said, I even forgot

1 about it was on there. I post a lot of stuff. I forgot it was on there until Michigan Tea
2 tried to make it like: Oh, look at her. I forgot about it.

3 Q Would you be surprised if I told you that you posted on Facebook either that
4 day or the next day a video, which I think also got taken down, where the caption was
5 "patriots storming the Capitol"?

6 A That would be when we were walking down the street, yes. I know it's up
7 there. I know it's there.

8 Q Do you -- why the phrase "storm" or "storming the Capitol"?

9 A I don't know. Because I think I used that a lot, and I guess like it
10 misrepresents what I mean. Like, when I say "storm the Capitol," I don't mean breaking
11 and entering. I don't mean -- I absolutely do not mean violence, right? And --

12 Q Yeah. Explain that, though, because what else does "storm" mean --

13 A -- the word, like and I understand that now. I guess, to me, going and
14 showing up and being massive and loud and making sure they hear us. I absolutely do
15 not agree with breaking into the Capitol. I don't agree with destruction in the Capitol.
16 I do believe that the punishment should fit the crime. But no, I don't -- I misused the
17 word.

18 Q Do you remember, like, hearing that word a lot in that time period, late
19 December 2020, early January 2021, that phrase "storm the Capitol"?

20 A You know, it's always used a lot. Can I give you an example?

21 Q Yeah.

22 A There's a convention coming up in Michigan. It's our delegate convention,
23 and it's used as we're storming the convention, which means they're getting a bunch of
24 delegates together to swing the vote the way they want to. So I guess when I use it,
25 that's what I'm talking about. That's how I currently feel. That's how deep down I feel.

1 Q When you were marching to the Capitol, did you hear people say things like
2 "hang Mike Pence" or "stop the steal"?

3 A I mean, "stop the steal," yes. I don't know. I haven't watched that video
4 in forever.

5 Q Yeah. But do you remember hearing anything about hanging Mike Pence,
6 taking the Members of Congress out, or in other ways stopping the certification of the
7 vote on January 6th?

8 A Maybe. I couldn't tell you. Like I said, it's been so long. If you had asked
9 me a month after it happened, I could probably tell you a ton of this stuff.

10 Q Looking back at that video, though, do you remember seeing violence on
11 January 6th?

12 A I didn't see the violence. I heard secondhand, and usually when you're at
13 rallies like this, which is also the reason why I removed it because of Ashli Babbitt, I kind
14 of was like, "Okay, somebody got shot," because usually when things are spoken about
15 like that, it's not true, right, like somebody just probably got knocked over or something.
16 So that's why -- there's a lot of miscommunication when you're at rallies like that.

17 Q But when you saw barriers on the ground, and, in your video, you can see
18 people heading up to the Capitol --

19 A Yup.

20 Q If you can think back to your feelings on January 6th, how did you take that
21 at the time?

22 A I don't know. You know, I think at the time, I was kind of pumped up
23 because of the crowd. So I think that's kind of what my feeling was. And then, in
24 hindsight, it was kind of like, you know, there's no reason for us to get violent.

25 Q Okay. You mentioned earlier about your feelings that you sympathize or

1 you follow the Founding Fathers' idea that they don't support a violent takeover, was
2 your words, unless it's defensive?

3 A Right.

4 Q Let me show you an exhibit --

5 A I know exactly what you're going to pull up.

6 Q You might. So this is a couple of your posts.

7 A Yup.

8 Q On the left is the one we talked about a little earlier.

9 And, on the right, it looks like it was posted January 6th: Y'all seem to forgot
10 how this country was saved the first and second time from tyranny. Please do look up
11 1776. I for one am one proud patriot this day. Most of you chose to stay home and do
12 nothing.

13 So was it your view that, on January 6th, people were acting in line with what the
14 founding generation did in terms of fighting against the British monarchy?

15 A No. Like, again, like I said, at that time, I didn't have a full complete view of
16 what was going on. I do believe in people's ability to peacefully protest and peacefully
17 gather absolutely. And I kind of feel like that's where that was coming from. But I
18 don't agree with violence. Violence is just -- it doesn't solve anything.

19 Q Sorry for my dog barking.

20 In terms of you specifically reference 1776. So what does 1776 have to do with
21 peaceful protesting?

22 A Because, in 1776, we declared ourselves a free country, which eventually
23 gave us the right to freedom of speech and petition peacefully.

24 Q Are you aware of the 1776 movement?

25 A What's that?

1 Q Are you aware of something that sort of calls itself the 1776 movement?

2 A No. I just have a bunch of stuff that says 1776.

3 Q In 1776, we did declare ourselves a free country, but we also entered into a
4 war with the British monarchy.

5 A Right, and that was the absolute last thing we did. It wasn't like we
6 jumped, right? We lived quite a bit under tyranny before we decided it had to get
7 physical.

8 Q Of course. And in this post about January 6th -- or sorry this post on and
9 about January 6th, when you say "please do look up 1776," were you talking -- what
10 specifically was the connection?

11 A You know, I don't -- I couldn't tell you what specifically the connection I was
12 thinking at that moment. I can tell you that, like, I had no clue to the indepth of what
13 had happened. Probably just really proud to be -- I mean, it was a historical moment. I
14 personally was there to protest peacefully. So, yeah, I was proud of myself for being
15 there. Was I proud that people died? No.

16 Q No. But, at the time, were you proud that people had gone gotten closer
17 to the Capitol and protested, you know, beyond where you were?

18 A I don't know. I couldn't tell you what I was really thinking at that moment
19 because I don't know. I do know that, like, I shouldn't have been proud of the situation,
20 but I also didn't know the whole situation at the time, if that makes sense. I'm trying to
21 explain myself.

22 Q No. Given what you did know at the time.

23 I guess what I'm trying to figure out is, given what you did know at the time, why
24 were you proud and why were you connecting it to 1776?

25 A Again, 1776 to me is the birth of our Nation, the birth of your constitutional

1 rights. So look up 1776, why they did what they did, why they -- you get what I'm
2 saying? I was kind of saying: Hey, if you want to pass judgment on people that are
3 there peacefully protesting, then look up 1776 and why we fought for the rights that we
4 eventually earned.

5 Q Was it your view that January 6th was in some way the birth of a new
6 country or the start of a new revolution?

7 A I don't know. I couldn't tell you. Probably at that moment. I don't
8 know.

9 Q Well, did you think that -- I guess, when did you find out -- sorry. Let me
10 rephrase.

11 Did you find out on January 6th while you were there that Vice President Pence
12 was not going to stop the certification of the vote for President Joe Biden?

13 A I think while we were walking down maybe, and then it was kind of put on a
14 hold, which people like me were mad that it was put on a hold because of the people like
15 doing the crazy stuff. I mean, I was there to make sure that the States that wanted to
16 object could object, and then everything went crazy, and that never happened, so I want
17 to say I was back at my hotel room when they officially, like, came on and said: Hey,
18 we're not going to object. I think I was in the hotel room, and then we found that out.

19 Q I guess I'm trying to figure out what was getting saved from tyranny that day.
20 And you do mention the first and second time the country was saved from tyranny.

21 So, on January 6th, what about what was going on was saving from tyranny?

22 A Well, January 6th, the peaceful -- and I have to keep saying this -- the
23 peaceful protesters were allowed to have their freedom of speech to protest what was
24 going on. So, to me, in a way, that is saving the country from tyranny; that is standing
25 up and having our voices heard. I couldn't tell you at the exact moment, but I know the

1 liberals like to plaster this all over the place as if I'm some warmonger. I can tell you
2 that's not the case.

3 Q Do you remember -- I take it -- I could guess, but what the first and second
4 time that you're referencing in this post are?

5 A -- from the first and second time from tyranny, I'm assuming I'm talking
6 about the Civil War.

7 Q And weren't both those wars fought with a lot of violence?

8 A What's that?

9 Q Weren't both the Revolutionary War and Civil War fought with a lot of
10 violence?

11 A Yes, they were. And people like me don't want that to happen.

12 Q Well, you can -- I think you can see why someone might take that the other
13 way if you're telling someone to look up 1776 and instructing people how they forgot
14 about it. But I take your point.

15 I guess the last question, then, you keep mentioning the peaceful protest part of
16 this, but even in that video, we can see people who had gone over barriers, or there were
17 barriers on the ground.

18 Do you consider those people to have been peaceful protesters?

19 A Well, I don't know who -- again, this is why the video was removed because I
20 don't know who removed the barriers. I don't know -- again, I took it down because I
21 realized I didn't know what I was talking about for the most part.

22 Do I think that people should go over barriers? No, I don't. But, at the same
23 time, we've seen it happen for countless times through our entire country or through the
24 last 7 years. Barriers are meant to be up. I get that. I don't condone it. I didn't tear
25 them down. I don't know what else to say to that.

1 Q I was just specifically asking, assuming that they were people who broke the
2 barriers down and went up to the Capitol, which I can represent to you did very much
3 happen --

4 A Well, there's also videos of the cops removing barriers too. I don't know
5 who specifically removed the barriers. I don't know. There's a lot of different
6 opposing sides. There's: Hey, the patriots removed the barriers. There's: Hey, the
7 cops removed the barriers and let them in. This is why I'm saying I removed it because I
8 didn't know what was happening.

9 Q I understand that.

10 A Sorry.

11 Q For the record, there are -- and I can represent this is a fact. I could pull up
12 the videos if you want. There are videos of people storming through barriers on
13 January 6th.

14 A Sure.

15 Q My question is, would those people qualify as peaceful protesters for you
16 under this formulation of why you say you posted about 1776?

17 A I don't know. I wasn't there to see it. So I would say no. I don't know.

18 Q Okay. After January 6th, I'm going to show you exhibit 22, and apologies
19 for the size. This is another Facebook chat that you produced to us.

20 A Sure --

21 Q Um --

22 A -- people seem to think that moves that could be made will come without
23 resistance. I hate to say it, but I'm afraid -- yeah. Absolutely. That's not me
24 threatening blood is being shed. That's me being terrified that it's going to escalate to
25 violence.

1 Q Yeah. So you anticipated -- my question was not whether you were
2 promoting blood being spilled, but why did you think that there could be blood to be
3 spilled in the next couple of days?

4 A Well, and I honest to God am not trying to be snarky when I answer this, but
5 you almost have to be blind to not see the everyday division in this country. It terrifies
6 me on both sides. You know, like I said I've mentioned before, I have been assaulted in
7 the street for wearing a red hat. You know, there's just this absolute division in our
8 country, and it terrifies me because, you know, it's almost like having two 2-year-olds
9 fighting in a sandbox; eventually they're going to, like, freak out on each other and start
10 hitting each other with shovels. We've seen this in our country for years now.

11 Q So, on January 8th, when this message was made, what were you thinking
12 could happen in the next couple of days? When you say "moves that could be made will
13 come without resistance," what moves were you thinking of?

14 A -- resistance -- so we were still talking and hoping -- there was a lot of talk
15 about there still could be some sort of, you know, challenge, individually State, so not like
16 in the -- this is what I am [inaudible] talk about -- not in the Capitol, but maybe like okay
17 Michigan can come now through and do an audit of the votes, or you know we
18 can -- even like working on the back end, we can talk about the machines that might be
19 not so great. Things like that.

20 Q Sorry. I muted myself because my dog again.
21 Where were you getting that information from?

22 A So I want to say just like Facebook, just random posts.

23 Q Were you in group chats about next steps for President Trump or anything
24 like that?

25 A I mean, there's so many Facebook chats out there. I couldn't tell you if that

1 was specifically one or what they were talking about. I couldn't tell you.

2 Q So the bottom bubble, you respond again: I've been told that he is still
3 fighting, and I was told to keep the patriots motivated to hold the line. There are some
4 moves being made. I'm just not important enough to know them.

5 Do you remember who told you or where that information came from that you
6 were supposed to keep patriots motivated?

7 A I think I'm just talking about -- I have a couple really close patriots, like
8 Suzanne Monk. She's a good friend of mine. She's like just keep hope up, keep people
9 motivated, keep people calm. Again, that was reinstating: I'm not important enough
10 to know these things.

11 Q In terms of the -- back to the word "patriots" here, does this only mean
12 Trump supporters?

13 A I believe you can be a patriot if you love your country and the Constitution.

14 Q Right. But who would you need to keep motivated in this circumstance?
15 Would you need to keep people who support Biden motivated or only people who
16 support Trump?

17 A I mean, I don't think people who support Biden listen to me anyway. I
18 think they hate me. No, I wasn't concerned with them.

19 Q Capital "P" patriot, is that standard? Is it a name you're using there or just
20 a typo?

21 A It's probably -- I don't know why it's capitalized. I have really fat thumbs.
22 I can't type correctly. You can ask my lawyer. It's horrendous.

23 Q Got it. Okay. Just a few more questions then.

24 On January --

25 A Can I take a bathroom break?

1 [REDACTED] Yeah. We can take a really quick -- we'll be back in 3 minutes.

2 [Recess.]

1 [4:20 p.m.]

2 [REDACTED] All right. We'll go back on the record at 4:20 p.m.

3 BY [REDACTED]:

4 Q Just one follow-up on January 6th, were you using Zello at all to
5 communicate with anybody that day?

6 A I think it was mentioned, but I -- I don't know -- I don't recall using it at all. I
7 mean, I know a lot of people do, but I don't recall using it.

8 Q Understood. And you were in a chat called "Remember the Alamo" that
9 was talking about January 6th. What was that chat?

10 A I don't -- people put me in chats like all the time, and it's super annoying to
11 me, trust me, because it's like my phone is constantly going off. So I don't know
12 specifically what it was about. As I explained to my lawyer, like, some of these
13 screenshots that I found I didn't even know existed until I like searched for, like, "Capitol."

14 Q Okay. And then there was an article, a New York Times article, I think you
15 mentioned, the possibility of civil war.

16 A Yes.

17 Q Does that have to do with what we were talking about earlier, the divisions
18 that you were seeing in the country?

19 A I'm sorry, can -- my phone is so bad.

20 Q That's okay.

21 A Can you repeat that?

22 Q Yeah. When you were talking about civil war in that article, what were you
23 meaning?

24 A Well, exactly what I explained earlier. We can look at history and look at
25 patterns sometimes and we can see the absolute division that's growing in our country.

1 And it's terrifying and it's disgusting, and I think both sides need to realize that we are
2 heading towards a dangerous path.

3 When I said that, and, of course, it wasn't reported, I said, Hey, listen, I've
4 defended, you know, constitutional rights, civil rights for both sides of the aisle. Again, I
5 have to reiterate, I believe in the Constitution. So I don't have to agree with you, you
6 don't have to agree with me, but we do have to learn how to peacefully figure out how
7 we can disagree. And the problem with that is that's not happening in this country.

8 You mentioned Grand Rapids burning. Well, yes, it did burn. I can't -- I am not
9 an expert. I can't say who did it or why they did it, but things like that are -- I'm sorry,
10 my daughter keeps calling.

11 Q That's okay.

12 A -- are absolutely happening and, yes, it's terrifying, and it needs to stop from
13 both sides. So it wasn't me going, I want civil war unless I get my way; it was, this is
14 dangerous situation that we all need to be looking at personally, and through our
15 government about what's going on.

16 Q Do you need to call your daughter back? That's --

17 A No, she's fine. She probably just wants money to go shopping.

18 Q Okay. So on January 6th, you said you listened to at least part of President
19 Trump's speech. Did you -- do you remember hearing his rhetoric about, you know,
20 "fighting like hell" or "going to support certain Republicans but not others and not
21 Democrats" and other sorts of divisive types of rhetoric?

22 A Right.

23 Q Do you remember hearing that?

24 A Honestly, it was more -- okay, so when you go to a Trump rally or any of
25 those big events, yes, you go to hear Trump speak, but if I remember correctly, like we

1 tried to get up front where we could really hear him, and we end up stuck back way by
2 the, like, Washington Memorial. So it was more about being there and in the
3 environment. We didn't even stay that long, you know.

4 Q Yeah, so, I guess --

5 A I'm sure he said something like that. I mean, that sounds very Trump-like,
6 but I couldn't tell you if I remember hearing it or not.

7 Q That's okay. Just in general then, since you said it sounds very Trump-like,
8 how do you think that kind of rhetoric from President Trump plays into the problem that
9 you just described about division in society?

10 A You know, both sides are pretty good at playing each other. I mean, we've
11 heard Democrats go, you know, what's wrong with burning a city? And then Trump
12 going, you know, the Democrats are super bad. Like, I love Trump and I support Trump,
13 but it's both this buildup on both sides, and I think that's what really is missing in this
14 society is a direct acknowledgment from both sides, saying we need to stop and we need
15 to stop right now. It's not just Trump, it's absolutely the Democrats as well.

16 Q I think this is the last question/topic I have is because, you know, you used
17 the phrase storm the Capitol. Do you know QAnon?

18 A Do I know QAnon?

19 Q Do you know what QAnon is?

20 A Oh, yes. I was like, no, I don't know who QAnon is. Sorry.

21 Q That was my fault. That was a very bad question. So do you know --

22 A Yeah, I mean I know --

23 Q Yes.

24 A I know what it is, yes.

25 Q Okay. Do you follow Q at all?

1 A No. I mean, some things he says are correct, you know, like the original
2 date of the inauguration. But, I mean, honestly I -- I have enough to deal with in my
3 own home. I have four kids, and I take care of my two other parents. I don't have time
4 to do the research that some people are just -- I've seen it go crazy. Some of it's really
5 crazy.

6 Q Okay. And I'm sorry, I lied, I had -- just because of people you know in
7 Michigan and others, do you know a Joseph Nasser?

8 A Joseph Nasser?

9 Q N-a-s-s-e-r.

10 A I don't, to my knowledge, but, I mean, again, I've got to remind you guys,
11 like, I talk to hundreds of people a month. Like, I sent a screenshot to my lawyer, and
12 I'm like, listen, there's like 1,000 text messages on my phone that I haven't even been
13 able to look at yet.

14 Q No, no, I get it. This is all to, you know, the best of your recollection.

15 A Yeah.

16 Q So how about a Scott Ryan Pressler?

17 A Yes.

18 Q How do you know Mr. Pressler?

19 A I had a MAGA dress made for my wedding by Andre Soriano, and then Andre
20 Soriano introduced me to Scott Pressler. He's the guy with the long hair, right?

21 Q Yeah.

22 A Yes. I've had maybe two or three, like, dinners with him in D.C.

23 Q Okay. So not a close friend?

24 A No.

25 Q Okay. Well, I think -- has the FBI contacted you since January 6, 2021, or

1 any other law enforcement?

2 A No. Well, I mean, other than the U.S. Marshal that showed up at my door,
3 so --

4 Q Yeah. Okay. I think that's all I have.

5 [REDACTED] or anybody else on Zoom, do you have any further questions?

6 Hearing none --

7 Mr. Dulan. No.

8 [REDACTED] Hearing none, we will adjourn this deposition, hold it in recess
9 subject to the call of the chair. So we are off the record.

10 [Whereupon, at 4:28 p.m., the deposition was recessed, subject to the call of the
11 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