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

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11 DEPOSITION OF: CHARLES ROBERT BOWMAN, III

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Friday, May 20, 2022

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Washington, D.C.

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20 The deposition in the above matter was held via Webex, commencing at 10:07

21 a.m.

22

Present: Representative Raskin.

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2 Appearances:

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5 For the SELECT COMMITTEE TO INVESTIGATE

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

7

8 [REDACTED] SENIOR ADMINISTRATIVE ASSISTANT

9 [REDACTED] INVESTIGATIVE COUNSEL

10 [REDACTED], INVESTIGATIVE COUNSEL

11 [REDACTED] INVESTIGATIVE COUNSEL

12

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14 For the WITNESS:

15

16 DAVID WARRINGTON

17 MICHAEL COLUMBO

18 ERIN POTTER

1

2 [REDACTED] Good morning.

3 This is a deposition of Charles Bowman conducted by the House Select Committee
4 to Investigate the January 6th Attack on the United States Capitol pursuant to House
5 Resolution 503.

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

7 The Witness. Charles Robert Bowman, III. Bowman is spelled B-o-w-m-a-n.

8 [REDACTED] Thank you very much, Mr. Bowman.

9 Would you please raise your right hand to be sworn by the court reporter?

10 The Witness. Absolutely.

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. Yes.

15 The Reporter. Thank you.

16 [REDACTED] Thank you.

17 So, Mr. Bowman, this will be a staff-led deposition. I am [REDACTED] I'm an
18 investigative counsel for the select committee. And on the Webex with me today is
19 [REDACTED] also an investigative counsel with the select committee.

20 I don't see any members on the Webex right now. If any of them do join, I'll let
21 you know. And they, of course, are free to ask questions if they choose.

22 So we'll follow the House deposition rules that we have provided to your counsel
23 previously. And under the House deposition rules, you are permitted to have an
24 attorney present.

25 So, Mr. Bowman, at this time, I'd ask your counsel to please state his name for the

1 record and the names of any other attorneys or employees present.

2 Mr. Warrington. Yes. David Warrington, W-a-r-r-i-n-g-t-o-n; Michael Columbo,
3 C-o-l-o -- C-o-l-u-m-b-o, counsel for Mr. Bowman; and our legal assistant, Erin Potter,
4 E-r-i-n, P-o-t-t-e-r, will be assisting us in taking notes.

5 [REDACTED] Thank you very much, Mr. Warrington.

6 Under the House deposition rules, Mr. Bowman, neither committee members nor
7 staff may discuss the substance of testimony you provide today unless the committee
8 approves release.

9 You and your attorney will have an opportunity to review the transcript.

10 And before we begin, I'd like to describe a few ground rules.

11 So there is an official reporter transcribing the record of this deposition. The
12 reporter is also joining us by Webex. So please wait until each question is completed
13 before you begin your response, and we will try to wait until your response is complete
14 before we ask our next question. And that's just because of our Webex; it's really hard
15 for the reporters to hear us if we're talking over each other. So, you know, we'll
16 both -- we'll all do our best to make sure that doesn't happen.

17 The reporter also cannot record nonverbal responses, such as shaking your head.
18 So it is important that you answer each question with an audible, verbal response. For
19 the benefit of the reporter and the record, there may be times where I or [REDACTED] spell a
20 name or a word that we are using or that we ask that you do the same.

21 And we ask that you provide complete answers based on your best recollection.
22 If the question is not clear, just please ask for clarification. It happens. And if you do
23 not know the answer, please simply say so.

24 Logistically, just let us know if you need any breaks for comfort or if you'd like to
25 discuss something privately with your attorneys. We're happy to accommodate.

1 And throughout the deposition, we'll be directing your attention to exhibits, which
2 will be displayed on the screen. When we refer you to a document, you can take your
3 time to familiarize yourself with it before we discuss it.

4 So I'm going to share exhibit 1 with you. Hold one second.

5 Mr. Warrington. Hey, [REDACTED] can -- could I ask a question or sort of a
6 housekeeping matter?

7 [REDACTED] Yeah.

8 Mr. Warrington. So as we've discussed, we still haven't been able to review and
9 provide you the documents for the subpoena. That process is still ongoing. The last
10 date I have was yesterday afternoon that the load file was being transferred into the
11 review platform. With that being said, obviously, we haven't produced those
12 documents yet.

13 We would ask as a courtesy, if you're going to ask him a question about a
14 document, you let him see it first and then ask him a question about it. That way --

15 [REDACTED] Of course.

16 Mr. Warrington. -- [inaudible] it might be a little bit longer than -- just because
17 you haven't seen some of the stuff, I'm sure we'll -- 18 marks or whatever, but I think
18 generally --

19 [Reporter asked for clarification.]

20 Mr. Warrington. Let me see if I can do something with this.

21 [REDACTED] But I take your point, Mr. Warrington. We'll absolutely give
22 Mr. Bowman the time to review the documents as we pull them up. And we understand
23 the situation about the production, so we're -- we'll probably -- we'll most likely leave
24 open the deposition at the end in case, after you produce, we need to ask Mr. Bowman
25 any further questions. But we can discuss that, you know, process later --

1 Mr. Warrington. Okay.

2 [REDACTED] -- if need be. But I appreciate it. Thank you very much.

3 EXAMINATION

4 BY [REDACTED]

5 Q So, Mr. Bowman, I'm going to show you exhibit 1.

6 Mr. Bowman, do you see exhibit 1 on the screen?

7 A It hasn't loaded yet. It's loading.

8 Q Oh, sorry.

9 A Okay. It's up.

10 Q Great. And do you recognize this as the subpoena that the select
11 committee issued to you?

12 A Yes.

13 Q Thank you.

14 So under the House deposition rules, you may only refuse to answer a question to
15 preserve a privilege recognized by the select committee. If you refuse to answer a
16 question based on privilege, staff may either proceed with the deposition or we can seek
17 a ruling from the chairman on the objection. If the chairman overrules such an
18 objection, you are required to answer the question.

19 [REDACTED] So at this time, I would ask Mr. Warrington to please place on the
20 record any objections he might have or to make any opening remarks aside from what we
21 talked about.

22 Mr. Warrington. I don't have any opening remarks.

23 [REDACTED] I appreciate it. Thank you.

24 And, Mr. Bowman, I also want to remind you -- and we do this for all
25 witnesses -- that it is unlawful to deliberately provide false information to Congress.

1 Since this deposition is under oath, providing false information could result in criminal
2 penalties, to include for perjury and/or providing false statements. Do you understand?

3 The Witness. I do, but I have a question for you.

4 [REDACTED] Sure.

5 The Witness. I understand in your prior statement that I do not, under the
6 committee's rules, have a Fifth Amendment right, or do I misunderstand that?

7 [REDACTED] No. I'm sorry. So you do -- you have the right to raise a Fifth
8 Amendment privilege to a question. And we would -- when that happens, we'll ask for
9 further clarification about why you're raising the Fifth Amendment. And, you know,
10 there's always the possibility that we raise the objection to the chairman and seek a
11 ruling on your assertion of the privilege, but -- does that help?

12 The Witness. So it's a no, or is it a yes?

13 [REDACTED] You're allowed -- you are certainly allowed to raise a Fifth
14 Amendment privilege.

15 The Witness. Okay. Thanks.

16 [REDACTED] Yeah.

17 BY [REDACTED]:

18 Q So I'm going to ask a couple of background questions for you, Mr. Bowman.

19 How old are you?

20 A I'm sorry?

21 Q How old are you?

22 A Forty-one.

23 Q And what is your educational background?

24 A Master's degree.

25 Q In what?

1 A Business.

2 Q Great. Did you get that at a Florida university?

3 A Undergrad was at a State university. Master's degree was UOP.

4 Q Great. And what's your current occupation?

5 A I'm the executive director of the Republican Liberty Caucus, and I'm a real
6 estate investor.

7 Q Thank you. And did you have a role with the Women for America First in
8 the time period between November 2020 and January 2021?

9 A I apologize. Did I ever what?

10 Q Did you have a role with Women for America First between November 2020
11 and January 2021?

12 A What are you -- define role.

13 Q Did you volunteer for them or work with them in any capacity?

14 A Yes.

15 Q Okay. And how long did you do so?

16 A I did on numerous occasions, so it wasn't a continuous stint, so I can't say a
17 total length.

18 Q Well, between November 2020 and January 2021, what were the periods
19 that you were working with Women for America First?

20 A I think I came on with them two, possibly three times. It wasn't
21 continuous, but I came on at least two times that I can recall.

22 Q Okay. And was one of those times for the December 12, 2020, rally?

23 A Yes.

24 Q And the other involved helping for the January 6, 2021, rally?

25 A I apologize. There's a little bit -- it's delaying a little bit. I didn't -- can you

1 repeat?

2 Q Okay. I said, and the other time, did that involve helping out for the
3 January 6, 2021, rally?

4 A Yes.

5 Q Okay. And do you remember what the third time was?

6 A Can -- what were the dates again?

7 Q It's between November 2020 and January 2021.

8 A So I think November, December, and January separately.

9 Q Okay.

10 A Yes.

11 Q You did help out for the November 14th rally in Washington, D.C., then?

12 A I know it was in November. I'm not sure if it was the 14th, but, yeah,
13 November for sure, yeah.

14 Q Okay. Do you remember where you helped them out, though? Was it
15 like on the bus tour or was it in Washington, D.C.?

16 A I recall being in Washington, D.C. I may have prior been with them as well.
17 I don't -- I don't know the exact dates.

18 Q Understood. Thank you.

19 So can you describe your role that you had with them? Like, what did you do for
20 Women for America First?

21 A So really in an advance capacity. I arrived to places before the bus does
22 setup.

23 Q And what were you setting up?

24 A Stage, sound equipment.

25 Q Do you have any particular expertise in sound or stage equipment?

- 1 A Expertise?
- 2 Q Yeah.
- 3 A No, I just followed the directions.
- 4 Q So why did you get that specific role for Women for America First?
- 5 A I assume no one else wanted to do it.
- 6 Q I'm just wondering, like, how did you get engaged with Women for America
7 First?
- 8 A Oh, you mean what qualifies me to -- I got you. So I was a -- a friend of
9 mine called, said they needed help.
- 10 Q Which friend was that?
- 11 A Dustin Stockton.
- 12 Q How do you know Mr. Stockton?
- 13 A Personal friend.
- 14 Q How long?
- 15 A Few years. Not sure exactly. Maybe four. Three, four.
- 16 Q Do you know how you -- how did you meet?
- 17 A How did I meet Stockton? At the We Build the Wall function in New
18 Mexico.
- 19 Q Okay. So you guys got engaged together with political events?
- 20 A I'm sorry?
- 21 Q You guys got -- your relationship started based on political events then?
- 22 A Yeah, I met him at a political event. That's correct, yeah.
- 23 Q Okay. Did you participate in other political events with Mr. Stockton in
24 Florida?
- 25 A Not that I recall.

1 Q Okay. So how did your relationship with him maintain? Was it just about
2 these Build the Wall events or did you guys do other political things together?

3 A Just a -- I met him at the We Build the Wall. Actually, I do believe -- to
4 correct myself -- I met him at one stop for the Women for America First tour in Ormond
5 Beach as well, which is in Florida. So --

6 Q And do you remember if that was like -- was that 2020, then, or was it a little
7 earlier?

8 A No. I think it was 20 -- yeah, it was 2020, I believe.

9 Q Okay.

10 A I think.

11 Q And why did he think of you to help Women for America First?

12 A I mean, you've known me 5 minutes, but I'm such a likeable guy.

13 Q So did he expect that you would be able to add anything specific to the
14 group?

15 A I think they were just shorthanded.

16 Q Okay. And why did you agree to join?

17 A A friend calls you in need, you try to assist, I suppose.

18 Q All right. Did you know anything about Women for America First besides
19 that one stop you went to?

20 A In -- in passing. A friend of mine had introduced me to the -- to the
21 organization prior, yes.

22 Q Okay. And, I guess, did you like report to somebody in that role?

23 A Not really. We had a -- a lead advance guy, the head of the team, and two
24 security guards that were assigned specifically to us. So --

25 Q Can you -- who was the lead advance guy?

1 A Gosh. Don Thompson.

2 Q Okay. Did you also ever work on security matters for Women for America
3 First?

4 A Come again?

5 Q Did you also ever help out with like security, getting security for Women for
6 America First events?

7 A Our formal security [inaudible].

8 [Reporter asked for clarification.]

9 [REDACTED] You broke up, Mr. Bowman.

10 The Witness. Hang on, guys. You're dragging real bad.

11 [REDACTED] Yeah. I think you're dragging as well for us. Can --

12 The Witness. I think it's my internet connection, actually.

13 [REDACTED] All right. Why don't we recess in place really quickly.

14 [Recess.]

15 [REDACTED] All right. Let's go back on the record at 10:26.

16 BY [REDACTED]:

17 Q So, Mr. Bowman, before we had a little technical difficulties, I asked if you
18 ever helped out for any security for Women for America First events.

19 A So not security, but how do you define security?

20 Q Did you help find people to play any role, formal or informal, with crowd
21 management or, you know, protection?

22 A Thank you for that. Yeah. Informally, yes.

23 Q Okay. And can you describe that?

24 A I'm sorry?

25 Q I said, can you describe what you did?

- 1 A So on a couple of occasions, I was asked to source volunteers such as that.
- 2 Q And what did -- what would you source volunteers to have them do?
- 3 A Which -- which event? Which time period?
- 4 Q So was it different each time?
- 5 A Yeah. No structure, yeah.
- 6 Q Okay. So then, I guess, for the November -- the first November one that
- 7 you mentioned, did you source volunteers or help out in this informal way at all?
- 8 A Yes.
- 9 Q Okay. And what did that look like for the November event?
- 10 A Perimeter -- perimeter, crowd management.
- 11 Q And who did you try to find to help out with that?
- 12 A Volunteers.
- 13 Q Where would you find volunteers?
- 14 A In Washington, D.C.
- 15 Q But how did you find these volunteers?
- 16 A Just individuals who I'd be aware of who were present.
- 17 Q And how did you know that they were there?
- 18 A I had many friends that were in D.C.
- 19 Q Okay. So you asked your friends to be volunteers?
- 20 A I asked -- I asked friends if they would be interested in volunteering for
- 21 various things, yes.
- 22 Q Okay. Were these friends members of any organized groups, like the Proud
- 23 Boys or Oath Keepers?
- 24 A Proud Boys, Oath Keepers? Not to my recollection.
- 25 Q Okay.

1 ██████████ And I'd like to note for the record that Representative Jamie Raskin
2 has joined. Welcome.

3 BY ██████████:

4 Q Were any of them Three Percenters?

5 A Define Three Percenters.

6 Q Did they identify themselves as Three Percenters?

7 A Gotcha. I can't speak to how each individual would have identified
8 themselves. I think that's more of an ideology than a group, but not for me to say. I
9 would assume some of them may have.

10 Q Okay. Was there a particular reason that you'd reach out to these
11 individuals to be volunteers?

12 A Just wanted to utilize people who I knew existing and who came from an
13 area that I did, just so they were, you know, known.

14 Q When you say came from an area that you did, were these also individuals
15 from Florida then?

16 A Exactly, yeah.

17 Q Okay. But they were also in D.C., obviously, to help out?

18 A Yeah. About a million of us, yeah.

19 Q Okay. And how did you communicate with them? Was there like an
20 organized chat on Telegram or Signal?

21 A So, I recall there being a Telegram chat. I don't think it exists anymore, but
22 I do recall one. I honestly do not recall all of the apps or means of communication.
23 There was a Telegram, yeah.

24 Q Do you have any recollection of what the name of the chat was?

25 A No. Unfortunately, I don't.

- 1 Q Okay. Did you set up the chat?
- 2 A Did I what?
- 3 Q Set up the chat. Like, were you the administrator?
- 4 A No. I believe I was added into it, but I was not the administrator, no.
- 5 Q Do you remember who added you into it?
- 6 A I remember who I believe added me into it.
- 7 Q And who do you believe added you into it?
- 8 A Jeremy Liggett.
- 9 Q Jeremy Liggett? Okay.
- 10 So was this a Guardians of Freedom chat then?
- 11 A It may have been, yeah.
- 12 Q Okay. Do you remember when he added you into that?
- 13 A I don't.
- 14 Q Okay.
- 15 A I don't recall.
- 16 Q And was this chat set up for security reasons for November -- the November
- 17 event or was it just a separate chat that you were added into?
- 18 A I could only speculate, because I didn't set it up. I don't know.
- 19 Q Well, what were the conversations like? Were they only talking about the
- 20 November event? Were they talking about other things?
- 21 A Best of my recollection, I wasn't, I don't believe, very active in it. I think I
- 22 was added into it peripherally, so I don't -- I don't -- I don't know.
- 23 Q Did Mr. Liggett add you so that you could find volunteers for this event or
- 24 did he add you for another reason?
- 25 A I believe, best of my recollection, that he added me in just to give me

1 visibility to, you know, the group. So just so you could get a feel for what the group is.

2 Q And what did you think about the group?

3 A I don't have much recollection of them aside from they just seemed like salt
4 of the Earth people that were, you know, patriot type. Didn't form much of an opinion,
5 yeah.

6 Q Were you -- would you consider yourself at that time to align with the
7 Three Percenter ideology?

8 A Would I consider at that time what?

9 Q Did you align with the Three Percenter ideology? Would you have called
10 yourself a Three Percenter at that time?

11 A I think -- I think you're either a Three Percenter or you're not. There's an
12 ideology to it. I don't know that I adhere to it, no, but I think they -- you know, you're
13 either a Three Percenter or you're not. I was not a Three Percenter, no.

14 Q So were you in that -- were you a member of Guardians of Freedom,
15 Mr. Liggett's group?

16 A A member?

17 Q Yeah.

18 A No.

19 Q Okay. Were you a member --

20 [REDACTED] Sorry.

21 [REDACTED] Oh, sorry. Go ahead, [REDACTED]

22 [REDACTED] Just had a quick question.

23 BY [REDACTED]:

24 Q Why did Mr. Liggett want you to become familiar with the Guardians of
25 Freedom group?

1 A Again, just -- listen, I have a tough time taking anybody at their word for
2 what organization and character or group may be, so I think for pure visibility, just to see
3 what -- you know, who they were. They are back local to the area where I live, so
4 they're there anyways. So just for -- to familiarize myself with it and -- yeah.

5 Q Were there -- were there other people that you knew of that were not
6 Guardians of Freedom but were added to the group chat for a similar reason?

7 A Yeah, I don't -- I can't -- I can't say. I mean, I think -- I do recall it was pretty
8 extensive in number, how many people were on it, but I wouldn't -- I wouldn't know the
9 entirety of who was in it.

10 Q And did -- for volunteers for this informal security for Women for America
11 First, did you source any of those volunteers from the Guardians of Freedom?

12 A So what I would try to do is just go to Jeremy and let Jeremy -- you know
13 what I mean? Jeremy picked, so --

14 Q Sure. And then just another quick follow-up question. I think previously
15 you had noted that some of the volunteers may or may not have been Three Percenters.
16 I wanted to ask you just a little more specific question.

17 Other than Mr. Liggett, did any of the volunteers that you got to work at Women
18 for America First events, did they ever talk to you about being Three Percenters or a
19 Three Percenter ideology?

20 A I don't recall specifically, but it -- far be it from me to speculate on what their
21 ideologies or beliefs are. Again, what I would just -- you know, see them where I see
22 them, you know. I don't know.

23 Q Yeah. And I'm not asking you to speculate about their ideology. I'm
24 asking you to tell me what they told you about their ideology, or, as you mentioned, what
25 they wore. Did you see any other people wearing Three Percent paraphernalia or

1 clothing?

2 A Oh, I see. So having the ability to review my own documents which are
3 trying to be uploaded into a portal, I would find it hard-pressed for me to speak to what
4 my experiences were or any of that prior to viewing them, so --

5 Q So you don't -- you don't remember any other people, other than
6 Mr. Liggett, that you saw either wearing Three Percent gear or talking to you about Three
7 Percent ideology?

8 A That day, I probably saw -- and that day being the January day -- I probably
9 witnessed thousands of people.

10 Q I'm talking specifically about volunteers that you dealt with from Women for
11 America First.

12 A Okay. Clarify your question. Condense it down for me so that I can just
13 directly answer you, because I'm getting a little lost here. I apologize. It's probably
14 me.

15 Q Sure. No problem.

16 Other than Mr. Liggett, do you remember any other Women for America First
17 volunteers either wearing Three Percent clothing or gear or talking to you about Three
18 Percent ideologies?

19 A I'm certain that there were. Specifically, I can't say, it's been so long, but
20 I'm certain that there -- there had to have been.

21 Q Okay.

22 [REDACTED] And go ahead, [REDACTED]

23 [REDACTED] Thank you, [REDACTED]

24 BY [REDACTED]:

25 Q So how did you meet Jeremy Liggett?

1 A Sorry. It dragged again. How did I meet who?

2 Q Jeremy Liggett.

3 A Oh, okay. So I don't know the year, but the Lake County Republican Party
4 has something called a Lincoln-Reagan Dinner, and I met him at the Lincoln-Reagan
5 Dinner, yeah.

6 Q Did you attend other events -- other political events with Mr. Liggett?

7 A With him?

8 Q Yeah.

9 A I recall being at things that he was at, rallies, things like that, around Florida.
10 I don't recall specifically what they were.

11 Q So I know you -- you -- I wouldn't say you're in charge, but you're very
12 involved with the local Republican Party, it sounds like, so I just want to get a little more
13 sense of like who you ran into at political events in Florida.

14 Did you ever run into Roger Stone at political events in Florida?

15 A In Florida? Not -- not -- not that I recall.

16 Q Did you run into him at any -- any rallies anywhere else?

17 A I believe I've run -- I believe I've seen him at least in D.C.

18 Q Did you ever -- but you don't have a personal relationship with Mr. Stone?

19 A Mr. Stone? No.

20 Q Okay. How about Enrique Tarrío?

21 A Tarrío? No.

22 Q Okay. Someone named Kelly Meggs?

23 A No.

24 Q Okay. Thank you.

25 So I think we might have gotten a little crossed about your provision of informal

1 security. We were talking about the November event, and then it seemed to bleed a
2 little bit into the other events. So I think we'll -- at this point, we're going to move into
3 the December 12th rally, and --

4 A Okay.

5 Q And -- well, actually, one second before we get there.

6 Are you a member of the Proud Boys, Mr. Bowman?

7 A A member of what?

8 Q A member of the Proud Boys?

9 A No.

10 Q Okay. Are you a member of the Oath Keepers?

11 A No.

12 Q Are you a member of a group known as the 1st Amendment Praetorian?

13 A No.

14 Q Are you a member of any militias?

15 A No.

16 Q Thank you very much.

17 [REDACTED] So I'll turn it over to [REDACTED], who's going to ask you a couple of
18 questions -- some questions about the December 12th rally.

19 The Witness. Thanks. ■

20 BY [REDACTED]:

21 Q Yeah. A couple of preliminary things. One, for all those questions that
22 [REDACTED] just asked you about, or those groups, he asked you if you were a member of
23 any of them.

24 A Yeah.

25 Q Have you ever been a member of any of those groups?

1 A I've never been a member of any of those groups, no.

2 Q Okay. And then, I know that you previously said that you were asked by
3 Mr. Stockton to help with Women for America First events. Was there anybody else
4 that worked for Women for America First that you knew before you started actually doing
5 work for them?

6 A Absolutely.

7 Q And who else did you know from Women for America First?

8 A I'm good friends with Michael Yoder, their attorney.

9 Q Okay. Anybody else?

10 A Give me a second. I'm running through my head.

11 Q Sure.

12 A Not that I can recall in this moment, no, sir.

13 Q Okay. Do you know the Chafians, Scott and Cindy?

14 A I know of them from the tour, yeah.

15 Q Okay. But you didn't know them before you started working for WFAF?

16 A No.

17 Q I think, actually, maybe before we get to December 12th, we can talk a little
18 bit -- in a little bit more detail about November 14th.

19 A Sure.

20 Q How -- what -- can you just take me through what -- when did you join the
21 bus tour or the Women for America First organization? Just take me through generally
22 what your involvement was with the November 14th event.

23 A Yeah. I'll give you the 30,000-foot view, because it's very fuzzy.

24 Q Okay.

25 A But I don't know the dates or times, but initially, I had met them through

1 Yoder.

2 Q Okay.

3 A And -- and then, secondarily, when I went out to join them, if you will,
4 Stockton had phoned me and asked -- you know, they were short people, if I could come
5 out and help with the events. So -- I don't know the date range, unfortunately.

6 Q That's fine. I understand a lot of these things happened a long time ago, so
7 feel free to just let me know if you're ballparking something or don't know an exact date.
8 Just whatever you do remember will be helpful. So I appreciate you trying on those
9 topics.

10 Can you just tell me a little bit about Michael Yoder? How do you know him?

11 A Yeah, absolutely.

12 The Witness. Do you mind if I grab just coffee real quick? Is that okay, guys?

13 [REDACTED] Yeah, that's fine.

14 The Witness. This stuff puts me to sleep. Just give me one second.

15 [REDACTED] Sure.

16 The Witness. I shouldn't be more than --

17 [Recess.]

18 [REDACTED] We're back on the record at 10:46.

19 BY [REDACTED]:

20 Q I believe you were just starting to tell me how you know Mr. Yoder.

21 A Michael Yoder. So I'm trying to, again, recall without my documents if I
22 introduced Yoder to that person or if Yoder introduced me. Was it Stockton? No.
23 Okay. It was -- it was a friend of ours named Shane that introduced me to Yoder. I
24 think he -- yeah. Shane. Shane Stevens --

25 Q Okay.

1 A -- I believe. I'm fairly sure.

2 Q Okay. And do either Mr. Yoder or Mr. Stevens have any connection to the
3 groups that we've talked about previously? So I'll list them quickly, but Proud Boys,
4 Oath Keepers, 1st Amendment Praetorians, or Three Percenters?

5 A Not -- you know, not to my knowledge, no.

6 Q Okay. Great. Okay. So then, for the November 14th event, I think you
7 were telling me or just going to walk me through kind of what your involvement was with
8 that event.

9 A I'm sorry. My dog walked up. What -- the November 14th?

10 Q Can you just walk me through at a 30,000-foot level what your involvement
11 was with that event, and then I can ask you some more specific questions?

12 A Listen, it's -- it's just -- there was a lot of disorganization, so, hey, go do this,
13 hey, go do that. Take passes. Of course we had setup. And then, really, I wish I
14 could make it more interesting, but I was kind of the guy doing whatever they couldn't get
15 done or -- or plugging holes.

16 Q And -- okay. Let's focus a little bit on the informal security aspect of the
17 organization and your involvement in that. What did you do with respect to organizing
18 informal security, if anything?

19 A Yeah. So my concern was -- as a volunteer of Women for America First, my
20 concern was just creating some kind of perimeter, crowd management. So it was
21 volunteer based, and basically a box.

22 Q Okay. And how did you go about creating that perimeter, or did you end
23 up organizing a perimeter or a box around the event?

24 A Yeah. So I --

25 Q I'm sorry. You indicated yes?

1 A -- communicated to -- I communicated to Jeremy. Sorry, there was a little
2 bit of a delay. I communicated to Jeremy more or less what, you know, we would like
3 for it to be and let it -- left it to him. So yeah.

4 Q And that was for the November 14th event?

5 A Best of my recollection, yeah.

6 Q Was there anybody else that you discussed the perimeter or the box with, or
7 did you recruit anybody else to help you form that perimeter or box?

8 A You know, without -- without reviewing my communications, that -- from
9 memory, I would say no, but until I review my communications, I wouldn't be able to say
10 definitively.

11 Q Okay. How about, just to potentially jog your recollection, we'll go over
12 those groups again.

13 A Okay.

14 Q Did you talk -- did you talk to anybody that you knew to be associated with
15 the Proud Boys about forming a perimeter or a box?

16 A So I believe there was one individual with Jeremy who was a former Proud
17 Boy. He was not a Proud Boy, I guess. Maybe they kicked him out. Beyond him, not
18 that I recall. Jeremy did have one friend, but I -- not beyond that, no.

19 Q Do you know what that friend's name was?

20 A Yes.

21 Q And what was his name?

22 A Matthew Robinson.

23 Q And did you ever speak with Matthew yourself or was it always through
24 Mr. Liggett?

25 A No. I knew of Matthew Robinson, yeah.

1 Q And how did you know Matthew?

2 A I believe that Jeremy introduced me to him [inaudible] back in Florida, I
3 believe, if I recall. It seems logical.

4 [Reporter asked for clarification.]

5 BY [REDACTED]:

6 Q Yeah. You were breaking up a little bit there. If you could repeat that
7 answer.

8 A Yeah. It was dragging a little bit, yeah. If I ever talk over you, I'm not
9 doing it intentionally. It's that I can't -- that's why I'm pausing before I answer you.
10 Yeah.

11 Q Understood.

12 A Guys, can you hear me?

13 Q We can hear you.

14 A Okay.

15 Q If you can just repeat your last answer about how you --

16 A Yeah.

17 Q -- knew Mr. Robinson and if you ever talked to him one-on-one?

18 A I believe Jeremy introduced me to him. He was back from the same area of
19 Florida that we were -- we were from. So yeah.

20 Q Okay. Any -- so that's Proud Boys. How about Oath Keepers, did you ever
21 speak to any Oath Keepers about helping form this perimeter or box?

22 A Yeah. I don't have any recollection of speaking to any Proud Boys or Oath
23 Keepers about forming the box, no.

24 Q How about members of the 1st Amendment Praetorians?

25 A Not -- not that I recall.

1 Q So for the November 14th event, do you recall about how many people
2 made up this box or perimeter?

3 A Yeah, I don't know. Do you want me to speculate?

4 Q I don't want you to speculate, but if you have a ballpark figure, that would be
5 helpful. You know, if we're talking in the hundreds or we're talking a dozen.

6 A I would say it's probably between one dozen and three dozen. They
7 weren't a particularly big group, but, yeah, I don't know.

8 Q And how did that come together? Did you have meetings around the 14th?
9 Did you communicate with them in any way?

10 A Best I recall, I would call Jeremy, and he would set pretty much everything
11 up. So through Jeremy.

12 Q Was anybody else at Women for America First involved in planning that
13 other than you?

14 A No, not that I recall. These -- these people were my friends. They had
15 their -- Women for America First had their own -- you know, own security, so these are
16 just my friends.

17 Q And who -- did anybody ask you from Women for America First to set up this
18 box or perimeter?

19 A Not that I recall. I mean, what -- again, once I review all my
20 communications, I could try to nail things down for you more, but not per my
21 recollection, no, sir.

22 Q Okay. And then you mentioned that Women for America First had their
23 own security setup. Can you just describe that for me and who was involved in that?

24 A So do you remember when you asked me about Cindy --

25 Q Chafian?

1 A -- Chafian, yeah. So my understanding was that she and her husband were
2 over the formal security of Women for America First, so that -- that's what I understand
3 theirs to be. And we had a couple of people assigned to us specifically on the advance
4 crew because we were having incidences with antifa and others, because we were so far
5 ahead out of the bus path arriving early and by ourself. So I believe Chafian was -- was
6 the -- the head of that.

7 Q Okay. And then, as far as the -- the actual folks doing security work that
8 the Chafians oversaw, do you know who they were?

9 A No. I know she and her husband ran it and -- you know, again, it's a while
10 back. Absent my communications, I can tell you that I remember there being a couple
11 of different groups, and I don't -- I don't know beyond -- probably best to ask her that,
12 yeah.

13 Q Okay. But no specific names of groups or names of individuals coming to
14 mind right now?

15 A No. I knew their name at one time, but I can't recall them at the moment.

16 Q You mentioned that you had some issues with antifa, and so you were
17 assigned a couple of security guards. Can you describe what those issues were?

18 A Yeah, sure. Our Tennessee stop, we have -- we had -- well, actually, at the
19 Tennessee stop, at the rally, we had someone that had a Molotov cocktail. I don't know
20 if I'm pronouncing that correctly.

21 But the -- another incidence on the road we had, we got boxed in by some -- some
22 cars on the interstate, tried to be driven off the road. And our setup was a truck and a
23 trailer, so it was a little precarious.

24 There was generally a presence at most of the places we set up, specifically antifa,
25 to answer your question. So it just became a need. I don't think it was initially security

1 detailed, but it became one along the way, yeah.

2 Q What was the -- I think you were referencing a Molotov cocktail. What
3 happened there? How did you -- how did that event unfold?

4 A So the -- I believe in my -- in my documents -- and, again, I hate to sound so
5 handicapped by not having reviewed my documents, but I'm just trying, you know. I
6 believe in my documents there may have been a picture of the individual even, but
7 the -- wherever we were in Tennessee, the police came. So it should be -- we should be
8 able to retrieve it. I don't know what became of him, but they took him away. I'll say
9 that. Thank God.

10 Q How about at the November 14th event once you were in D.C., did you
11 witness any violence or any -- well, I'll ask that just first. Any violence that you saw at
12 the November 14th event?

13 A So I was down in the event very close. I didn't witness any violence down
14 in there, so yeah. I would say the box was highly effective.

15 Q And then, for the -- for the November 14th event, was there any sort of
16 group chat or group communication with folks that were participating in the box, like
17 Mr. Liggett or anybody else?

18 A Yeah, I don't -- I don't know offhand, but I will tell you that we forensically
19 copied all my communications, and we're going to, you know, provide that to you,
20 so -- there may have been. I don't know.

21 Q All right.

22 [REDACTED] [REDACTED] any other questions about November 14th before we
23 move on to the 12th?

24 [REDACTED] Just a couple.

25 BY [REDACTED]:

1 Q Did you see any weapons on anybody at the November 14th rally?

2 A And I'm not trying to be a wise guy here, but -- but what do you mean by
3 weapons?

4 Q Firearms, knives, batons, things that you could use to assault somebody else.

5 A I saw bear spray, walking sticks. No -- no weapons as I would define a
6 weapon. No guns or knives, no. I saw a lot of bear spray, [REDACTED]. A lot of bear spray.
7 Bear spray's the primary thing, so --

8 Q And were those rally attendees or were these people that you thought might
9 be antifa that had the bear spray?

10 A Oh, I just mean in general, yeah. All sides. I'm not -- I'm sorry. Did I
11 misunderstand your question? Did you mean specifically in --

12 Q No.

13 A You meant general, right?

14 Q Yeah.

15 A Okay.

16 Q You answered exactly what I thought that you were thinking.

17 A Yeah, yeah.

18 Q Thank you. And then do you remember who -- so I know you mentioned a
19 Don Thompson earlier. Was he part of your security detail for the November rally -- or
20 the November events? I'm sorry.

21 A So you froze. Can you still hear me?

22 Q Now I hear you.

23 A Now you're back. Sorry.

24 Q Yeah.

25 A No. Don was the head of the advance team, so he was -- he was the -- to

1 speak to your prior question, he was the person that was sound expert, lighting expert,
2 the guy of the trade, right? So he was the head, I was the assistant, and then we had
3 people assigned to us who were, you know, formal security.

4 Q Got it. Do you remember the names of any of those people who were
5 formal security for you?

6 A I remember the first name of one of them. I don't remember the name of
7 the other one. The first name of one of them was Jerry, and -- hang on. What was the
8 other guy's name?

9 Early on, we had a guy named Ken, but I think he was reassigned to a bus. I
10 remember Jerry being stuck with us the whole time. And there was a secondary person,
11 but I don't remember, [REDACTED] the name of the person, so -- I apologize.

12 Q Did you have -- it's okay. And do you know if these guys -- the security guys
13 were Proud Boys or Oath Keepers or members of any militia groups?

14 A Yeah, I have no idea regarding that. I don't believe so. I think they were
15 all from like legitimate security company, you know, hired by the hour type of deal, but I
16 don't know their backgrounds.

17 Q Was that like RSM Security or something like that, if you remember?

18 A I do vaguely remember a RSM security. I don't know if they belonged to
19 that. They're -- I remember seeing a card that said RSM Security on it, so perhaps.

20 Q Okay. And understanding that, you know, you haven't had a chance to
21 review your documents, do you remember being part of any of the chats for this
22 November rally with the Chafians about formal security matters?

23 A So I can't speak to if there was a security chat. I know there was a group
24 chat with pretty much everyone from the -- the group, Women for America First group.
25 I was in that. I assume it's going to be provided, if it exists still, to you through the

1 forensic audit, so --

2 Q Okay. But you just -- you don't remember a security specific chat, correct?

3 A No. I think it was a broad chat, but, you know, the whole thing was like a
4 broad communication.

5 Q Understood. Thank you.

6 [REDACTED] And before I turn it back over to [REDACTED] I'd just like to note for
7 the record that Investigative Counsel [REDACTED] has joined via Webex.

8 But thank you very much, Mr. Bowman.

9 Back to you, [REDACTED]

10 [REDACTED] A couple more questions just on November 14th. I know you said
11 that Mr. Liggett did most of the communication and -- with the volunteers on the box and
12 the perimeter, but I want to talk about on the day of November 14th, folks that you met
13 and talked to.

14 So at the rally in D.C. on November 14th, did you -- do you recall meeting any
15 Proud Boys or talking to any Proud Boys?

16 The Witness. Yeah, it's so long ago, I don't -- I don't recall, but I would -- I would
17 point, again, to the communications you guys will receive in the forensic stuff. Maybe
18 there's something there. I don't know. I don't recall. It's so long ago.

19 [REDACTED] Okay. And --

20 [REDACTED] Actually, can I jump in, [REDACTED] quickly?

21 Did you -- Mr. Bowman, on November 14th, did you hear a speech by
22 Enrique Tarrio at the Washington Monument?

23 The Witness. Not -- not that I recall. I don't believe I was there. I had heard
24 of -- I don't know if it was news [inaudible] through chat or chatter of that event, but I
25 don't believe I was there, no.

1 [Reporter asked for clarification.]

2 [REDACTED] You broke up again.

3 The Witness. Completely on my end. I apologize.

4 [REDACTED] Can you repeat that? I can try to repeat.

5 I think you said you don't remember being there, but you might have
6 heard about it in news or chats later. Is that correct?

7 The Witness. I -- I -- best of my recollection, yeah.

8 [REDACTED] Okay. Thank you.

9 Sorry, [REDACTED]

10 BY [REDACTED]

11 Q Do you recall talking to Mr. Tarrío at all on November 14th?

12 A Mr. Tarrío? No. I've never, to my knowledge, spoken with Mr. Tarrío.

13 Q And then same questions for any members of the Oath Keepers. Do you
14 remember talking to any members of the Oath Keepers or people that you knew to be
15 members?

16 A Again, not -- not -- I don't recall any. No.

17 Q Have you ever met Mr. Rhodes, Stewart Rhodes?

18 A Not that I recall, no.

19 Q Okay. Then let's move on to December 12th. And, again, let's start at the
20 kind of 30,000-foot level. Can you just describe what your involvement was in planning
21 for that event and just kind of take me from beginning to end, and then I'll ask some more
22 specific questions after that.

23 A Long ago again, but more or less the same. The -- these events operate like
24 this, guys, and just so you know, you set up the stage -- well, let me back up. There's the
25 perimeter, a stage, lights, sound, you know, very loosely organized actual event where

1 they try to corral the speakers on one by one. That's really it.

2 Everything in December, from where I sat -- from my lowly position volunteering,
3 would have been to duplicate it and just try to make it run smooth. So it probably went
4 much like November did.

5 Q And how about with respect to the informal security, did everything -- was
6 everything the same in November as -- or sorry -- in December as it was in November?

7 A People may have changed, but my contacts, same. You know, hey, Jeremy,
8 we need some volunteers. Who they would have been on that moment may or may not
9 have been the same as the exact people in November, but same -- same exact premise,
10 yes.

11 Q And just to take you through those groups again, do you recall any more or
12 less involvement by the Proud Boys in that informal security role in December as
13 compared to November?

14 A Yeah, no. I mean, I -- I don't have any recollection of any involvement from
15 any of those groups, no.

16 Q Other than Mr. -- for December 12th, other than Mr. Liggett, was there
17 anybody else that you remember reaching out to to recruit informal security?

18 A No. I mean, so people were there, friends, right? But recruiting, no. I
19 left that Mr. Liggett. Best for him to arrange.

20 Q Okay. Let's talk about, then, some of, like, the friends that you might have
21 invited. Do you know if any of those friends were members of the Proud Boys or Oath
22 Keepers?

23 A So, to my knowledge, I don't have any friends who are Proud Boys or Oath
24 Keepers at all. The only person I know that has any affiliation whatsoever was the
25 gentleman I referenced who was Jeremy's good friend, who was kicked out. So I

1 don't -- no. I guess no, yeah.

2 Q Let's take a moment to look at a document that we have. We've
3 premarked it as exhibit 2. And it's a text message exchange between you and
4 Ms. Kremer -- Ms. Kylie Kremer.

5 A Uh-huh.

6 Q And let me know if you're able to see the text message.

7 A Yeah. It's small, but I can see it.

8 Q Okay. Mr. Stockton is also on this group chat.

9 And if we can scroll down a little bit. Great. There you go.

10 So I'll give you a second to read through this, and let us know if you want us to
11 scroll up or scroll down at all, and just let me know when you've familiarized yourself.

12 A Okay. Are you scrolling more or is that the entirety of it?

13 Q I think there's a little bit more below.

14 A Okay.

15 Q Less relevant to our -- to my questions, but if you'd like to see that.

16 A Okay. Okay.

17 Q So these are text messages exchanged on the 12th with -- between you and
18 Ms. Kremer.

19 Do you recall these messages at all?

20 A You know, looking at the snapshot of this, I don't, but I'm sure whatever the
21 entirety of them -- I'm sorry, I'm still reading. I'm sure that whatever the entirety of
22 them entails, I'm sure it'll come up in my forensic return. Yeah, I don't recall specifically.

23 Q Well, let's talk about a couple of the messages and just see if you can give us
24 a little bit of context about them.

25 A Okay.

1 Q So the first one I want to look at is the message that you sent at 2:01 p.m.

2 A Can you make it bigger, any chance? And I apologize. I'm not trying to
3 interrupt. I'm just on a small Mac.

4 Q No problem.

5 A Thank you. Appreciate it.

6 Q So this message at 2:01 p.m., you sent to Ms. Kremer. It says,
7 Three-quarters of Proud Boys are at monument now.

8 Can you tell me, did you have some preset understanding of how many Proud
9 Boys would be there on the 12th?

10 A No. I'm sure I was just regurgitating something I'd heard.

11 Q And do you know who you might have been talking to about the Proud Boys
12 or who might have told you that three-quarters of them were at the monument?

13 A Unfortunately, I don't. I hate I don't have my documents. I might could
14 help you more. If you could scroll up more or down, if there's more to the messaging, I
15 might can help you more. Is this it?

16 Q This is it, yeah.

17 A Yeah. Not based on what I can see here.

18 Q And then the next message up at 2:02, sent a minute later, you state -- and
19 I'll just read for the record: So if antifa is gonna come in and try to break the box, it will
20 be now.

21 I take it that box is the perimeter that you were talking about?

22 A The -- perhaps. It would make sense, yeah.

23 Q What -- what was the actual kind of geographic region that the box covered?
24 Was there a specific area?

25 A So I do recall one of the streets, if it's helpful. I'm sure it's -- again, I'm not

1 trying to beat a dead horse. I'm sure it's all in my communications, but I do remember
2 Constitution being whatever direction that was, and then -- God. Not off memory, I
3 can't remember the rest of it.

4 But it was pretty far. It was blocks away, big perimeter. But Constitution was
5 definitely one of the streets.

6 Q I'm just interested in general on the focus on the Proud Boys in this text.

7 A Uh-huh.

8 Q I know that Mr. Liggett was associated with the Three Percenters and the
9 group Guardians of Freedom. But that's not the group that you reference in this text
10 message. It's the Proud Boys.

11 Can you explain that a little bit for me? Why were you focusing on the Proud
12 Boys?

1

2 [11:12 a.m.]

3 The Witness. Listen, I see what you see here, and it was so long ago. Absent
4 reviewing the entire conversation -- and I'm sure I have it in my communications -- I
5 couldn't speculate.

6 BY [REDACTED]:

7 Q Okay. And I understand that --

8 A Yeah.

9 Q -- maybe some context might jog your memory little bit, but sitting here
10 today, you don't recall anything at all about communications with the Proud Boys or what
11 you heard about the Proud Boys' activities on the 12th?

12 A No. Again, I assume I was regurgitating something I heard. I don't recall
13 who I heard it from, but, yeah, I just don't know.

14 Q Do you recall talking to Mr. Liggett about the Proud Boys on the 12th?

15 A Do I recall what?

16 Q Do you recall talking to Mr. Liggett about the Proud Boys on the 12th?

17 A I don't recall sitting here and now. Maybe we can find something in the
18 documents we provided you, I'm not sure.

19 Q And then again, I just want to look at that text message and the reference to
20 antifa. Can you describe to me what you saw as far as antifa presence goes on the
21 December 12th event?

22 A Yeah. So Washington, D.C., has, I guess you would call them scooters.
23 There's a lot of pay-for scooters. So they seem to be mostly cruising around on those,
24 just everywhere really, nowhere specific. They were all over the place.

25 But aside from that, they were just sporadically everywhere you went, I guess like

1 any other groups that were there, they were just there in volume, so.

2 Q And what did you see them doing? Did you witness any violent acts or, like
3 ██████ asked about, any weapons or anything like that?

4 A So I don't know if it's because I'm 6'6", but anytime they came near me, they
5 left pretty quickly. And I didn't come up on them doing anything to anyone else that I
6 recall right now, no.

7 Q And then another message here happens later in the evening at 6:52 p.m.,
8 and this version of the text that we have didn't produce the images that were sent in the
9 text message. So it looks like there's a blank text where a photo was probably sent, and
10 then you send the message, found more of our friends LOL. Do you recall what that was
11 about or who your -- who the friends were?

12 A I don't, but if -- if you notate the date and time, maybe it will be responsive
13 to what we're providing, but, yeah, I don't -- I don't know. I don't know what it could've
14 been. Maybe it's still there but with the picture.

15 Q Do you know if anybody else Women for America First would've had any, or
16 do you remember anybody else at Women for America First talking about the Proud Boys
17 or their presence on December 12th?

18 A Yes, actually. Yes. So --

19 Q And what do you recall?

20 A Well, so our hotel was the Willard. And for whatever reason when they
21 congregated for their meetings -- the Proud Boys, I mean -- they would do it on the street
22 between the Willard and whatever that next hotel was. I don't know what it was.

23 So I do recall -- and I don't know who, but people from the tour going, hey, look
24 out the window. They're down there again. Just because they're so loud. You know,
25 they're very loud and boisterous, so.

1 Beyond that, no, but I do recall being brought to the window and go, hey, look,
2 they're down there again, so. Absolutely, yeah.

3 Q All right. And then [REDACTED] I don't think I have any other questions
4 about exhibit 2. We can pull that one down.

5 I want to ask you quickly about another group, the First Amendment Praetorians.
6 Are you familiar with that group?

7 A I'm not familiar with them. I've heard of them in the news, and I've heard
8 them from you, but I'm not familiar with them personally, no.

9 Q Did you ever hear anybody at Women for America First talk about First
10 Amendment Praetorians?

11 A Not that I recall.

12 Q Are you aware of any connection between Scott Chafian, Mr. Chafian, and
13 First Amendment Praetorians?

14 A No, not that I recall.

15 What are they?

16 Q It's another group. They hold themselves out sometimes as providing
17 security.

18 Did you hear about any other groups, other than the RMS group that we talked
19 about, providing security for Women for America First?

20 A So Women for America First security, I believe you're accurate with RMS,
21 RFS, whatever you said it was, because I remember hearing that. There was another
22 group, I think, led by a gentleman named Lawrence. That may or may not be the same
23 RFS, RMS group. I just remember his name being Lawrence and he being the head of
24 security.

25 So if there is a second group, it would've been Lawrence's group. I don't know

1 what the name of it would've been, but I could be crossing them up. It's fuzzy. I don't
2 remember, you know.

3 BY [REDACTED]:

4 Q Was his name Martin Lawrence?

5 A I'm sorry?

6 Q Was his name Martin Lawrence?

7 A I just remember people summoning him by Lawrence, and he had a strong
8 accent. I don't know really what his whole name was or any -- yeah, I don't recall
9 beyond that. Definitely Lawrence, though.

10 Q Got it. And you never interacted with this Lawrence personally?

11 A Prior to Women for America First, no, uh-uh.

12 Q No. With Women for America First, did you have personal interactions
13 with Lawrence?

14 A Oh. I'm sure. I mean, we stop and eat together, everything else, as a
15 group, but, yeah, I don't know specifically.

16 Q Okay. And do you remember sort of precisely what he was doing for the
17 security, like, how he was arranging security or what his role was?

18 A He was kind of quiet. I just remember him being, you know,
19 summonsed -- Lawrence, where's Lawrence, so on and so forth. I don't know beyond
20 that. I wasn't -- I wasn't allowed in the security meetings.

21 Q Okay. So was it the Chafians who were summoning Lawrence?

22 A Yeah. The audible stuff I heard, maybe the Chafians or other people. But
23 like I say, the details of whatever the security outfit was, I was the help, so I wasn't
24 allowed in the security meetings.

25 Q Did you and Lawrence ever have conversations by yourselves, like at lunch or

1 dinner or whatever?

2 A By ourselves, you said?

3 Q Oh, sorry. "By ourselves" was the wrong term. Just like, you know, not in
4 the security meeting, did you have conversations with Lawrence about just day-to-day
5 stuff?

6 A Yeah, I don't recall any such instances, but if they exist, they probably
7 would've been electronic, so.

8 Q Okay. Do you remember him ever talking about General Flynn?

9 A I don't recall that specifically, no.

10 Q How about Rudy Giuliani?

11 A No, not specifically, no.

12 Q Do you know if this Lawrence was providing security for anybody else at the
13 December rally?

14 A I don't know if it was December or January. There was another couple.
15 Give me a second, I'm trying to remember. Gosh, what was her name? There
16 was -- he did provide security for someone. It was another couple, another
17 husband/wife. I don't know their name, and I don't know if it was December or if it was
18 January. I don't recall.

19 Q Did he ever tell you if he was part of a group or if he was just doing this as,
20 like, you know, a single hired hand?

21 A My impression, it was just transactional. He was kind of a quiet guy. But,
22 yeah, I think it was just transactional deal, hired security.

23 Q And sorry to keep pestering you, but I'm just trying to figure out who he is.
24 Did he talk to you at all about ideological views, you know, about the importance of free
25 speech or anything like that?

1 A Not that I recall. I don't know that he was stateside, though, [REDACTED] I
2 think he's from -- from another country.

3 Q Oh, okay. So his accent wasn't an American accent to you? He was
4 possibly foreign?

5 A Maybe strong English, like English, I would say. Yeah.

6 Q Thank you very much.

7 BY [REDACTED]:

8 Q You noted that you were excluded from these security meetings or you
9 weren't allowed to be part of the security meetings. Do you know why that was?

10 A Yeah. So I was a volunteer with Women for America First, and quite
11 literally, I helped set things up on the advance crew. It was probably above my pay
12 grade, but I don't know that anyone who wasn't a formal positioned person with the
13 group that was in there. I can't say, because I was never in there. But it was definitely
14 like a, there's no reason for you to be in there, you know, so.

15 Q Do you ever remember any, like, memos or written products about a
16 security plan or, yeah, about security plans?

17 A Women for America First security plan?

18 Q Correct.

19 A Which date? Or just in general? All dates?

20 Q I'm talking about the December -- for Washington, D.C., December 12th.

21 A December. Oh, man, not specifically for December, no. Not offhand. I
22 mean, the communication that we had, the group -- everybody's doing this, everybody's
23 going to go -- may have had comms in it, and you guys should get that in my forensics, but
24 it may have something detailing when there's going to be a meeting or something
25 specific. But we weren't necessarily all paying attention to that group communication

1 either.

2 Q It sounded like maybe there were memos related to other events or States
3 that you were thinking of. Is that the case, or was there some other memo you were
4 aware of?

5 A So, no, you know, I wasn't privy to the security meetings per se, but you hear
6 security guys say things. Hey, look, be aware of this, be aware of that, depending on
7 where you were.

8 And I don't recall specifically what they were, but just in full transparency, I
9 remember audibly hearing, [inaudible] this is what our intelligence says or whatnot, so.

10 Q Do you remember who was in those security meetings?

11 A If you give me a moment, I can think back and try to. So definitely the
12 Chafians, for sure. Stockton, I recall. Maybe or maybe not Lawrence. And Lawrence
13 would've been Jen Lawrence, different Lawrence, Jennifer Lawrence, it would've been
14 Stockton's fiancée. Of course Amy.

15 Just think about whatever the upper echelon of the organized part of the group
16 would be, that's who would be in there.

17 [REDACTED] Was Michael Yoder in that group too?

18 The Witness. Not that I recall. I mean, he may have been, but, you know, I
19 don't -- literally, [REDACTED] anytime there's a security meeting, I'm shooed away. I have
20 better things to go -- you know what I'm saying?

21 Q Yeah. Thank you.

22 BY [REDACTED]:

23 Q Do you recall or do you know an individual named Jason Funes?

24 A Yes.

25 Q Can you tell me about him?

1 A So the structure of the organization, Don, you recall who Don is, right? Don
2 was the guy, the expert of the sound, light, so on and so forth. So Don initially reported
3 out to Jason. So Jason would've been over the events team. Don would've been the
4 nuts and bolts getting it done, and then I would've been Don's help. So I believe Don
5 reported to Jason, and then Jason sat in that kind of more upper echelon of the people
6 managing, if you will.

7 Q And do you think Jason was part of the security meetings that you're talking
8 about?

9 A Possibly. I mean, he was definitely someone who was more relevant in
10 higher tier, so probably, yeah. I can't say, but I would assume, yeah.

11 Q All right. There is another set of communications that I want to ask you
12 about, and you may not -- you may or may not have been a part of these. But it was a
13 group chat related to security for December 12th.

14 A Okay.

15 Q And we'll pull it up in a second, but the name of the group chat was
16 pretty specific.

17 A All right.

18 Q It was Nakatomi Plaza Reunion.

19 A Nakatomi Plaza -- okay. Yeah, I see it.

20 Q Does that ring any bells or mean anything to you?

21 A No. Let's see it. Maybe I can help.

22 Q Yeah, let's pull up exhibit 14. Just start on this first page. So now looking
23 at that title, do you recall that at all?

24 A No, sir. Nothing so far. Scroll it and I'll see if I --

25 Q It's sort of a long document, so I'm going to --

1 A Yeah, yeah, yeah.

2 Q -- direct your attention to a couple specific pages but let me know if you
3 want to see the messages above or below.

4 A Whatever you think's relevant, yeah, let's see it. I'm going to lean in, guys.
5 I'm not trying to give you a clear view of my ugly mug. I'm just trying to read it.

6 Q Let's actually just stop here for 1 second.

7 A All right.

8 Q Does the name Rob Lewis mean anything to you, or do you recall that name?

9 A The only Rob I recall -- I don't know his last name -- there was -- I do
10 remember a Rob. I don't think his last name was Lewis. He was driving around some
11 big float, like some big Trump unity float or something. That was the only Rob I recall.
12 I don't think it was Lewis. No, I don't think so.

13 Q All right. And how about an individual that went by the name Yoda?

14 A No. Yoda. Don't know a Yoda.

15 BY [REDACTED]:

16 Q Do you know a Geoffrey Flohr, F-l-o-h-r, Geoffrey, with a G. G-e-o-f-f-r-e-y?

17 A No. Not that I recall, no.

18 [REDACTED] Thank you.

19 BY [REDACTED]:

20 Q And then, let's look at page 7. And on this page, [REDACTED] if you can find it, is
21 a reference to a meeting on December 11th. So this is talking about a meeting the night
22 before the 12th, which is the primary event.

23 A Okay.

24 Q First question, do you know somebody by the name Chris Ragone or Chris
25 Ragone?

1 A Not that I recall.

2 Q And then this mentions a meeting the night before. Half my team is on
3 location, but the other half traveling in from out of town so we will have rooms in
4 Pentagon City area Friday night.

5 Do you remember when the security meeting that you were talking about, that
6 you were excluded from, do you recall when that was?

7 A Oh. Oh, no. And I mean in generalities, like, they had them a lot. But
8 they were just off limits, so, no, I don't specifically. I apologize.

9 Q That's fine. And then let's scroll to page 16, down towards the bottom of
10 the page. I'm going to give you a second to read that longer message that's right there.
11 Let me know when you get to the end of it.

12 A Okay. That's it, or you scroll down or are you good?

13 Q Yeah, I'm going to scroll down a little bit more.

14 A Okay.

15 Q And then I'll have you read the following message from Scott Chafian, then
16 we'll stop there for a second.

17 A Okay.

18 Q So my first question about this is, in addition to the box or perimeter that
19 you've described for us, do you remember any plans, or were you involved in any plans
20 about escorting people to or from cars or away from the event as it concluded?

21 A Yeah. Nothing in addition to the box which I already made you aware of,
22 yeah. Yeah, no.

23 Q And then now having read these messages, do you recall any other
24 conversations about Proud Boys with anybody else at Women for America First, like Scott
25 Chafian or Cindy Chafian?

1 A No, yeah, absolutely not. Yeah, I don't recall any.

2 Q Does thinking back to the exhibit 2 that we looked at, your messages
3 exchanged with Ms. Kremer, having read this, does it jog your recollection at all about any
4 other conversations about the Proud Boys you might've had related to the December
5 12th event?

6 A Just two points of clarification. On exhibit 2, that was the one with Kylie on
7 it?

8 Q Yes. Yeah.

9 A Would it be burdensome, can we skip back to it so I can see it?

10 Q Sure.

11 A Sorry. Not trying to be a pain.

12 Q No. No problem.

13 A Okay. That was the one with the missing image. All right.

14 No. Yeah, no.

15 Q Okay. And I just ask that because -- so these are conversations in advance
16 of the 12th where the Chafians are discussing bringing in the Proud Boys or using the
17 Proud Boys as part of the security plan.

18 And then from your messages on the 12th with Kylie, it seems like there was some
19 awareness of the Proud Boys' presence, but I understand that you don't recall any
20 conversations about the Proud Boys related to the 12th --

21 A Yeah.

22 Q -- as you sit here today?

23 A Yeah, I can't speculate on whatever the Chafians had going on, but I don't
24 have any additional recollection, no, sir.

25 Q All right. And then let's scroll down to the next page, page 17, and then so

1 this is -- just that top message is the one that I want to look at first -- again, from -- we've
2 talked about Rob Lewis, who I understand you don't know or don't recall.

3 BY [REDACTED]:

4 Q Would it help, Mr. Bowman, if we said his full name, Robert Patrick Lewis?

5 A No. Like I say, I only recall one Rob and, yeah, it's a different Rob
6 unfortunately.

7 Q The Trump Unity Bridge Rob?

8 A Yeah.

9 Q Thank you.

10 BY [REDACTED]:

11 Q So looking at this message from Rob Lewis, and it's the second line that I
12 want to draw your attention to. I'll read it for the record. It says Felisa, F-e-l-i-s-a, has
13 direct comms with PB founder Enrique.

14 Do you have any idea who Felisa is, or do you recall was Felisa involved in the
15 security planning?

16 A No. And I think I -- I don't remember that name. That's a very specific
17 name too. I don't remember it, no.

18 Q All right. And then does the name Chi Chester mean anything to you?

19 A Chi Chester, not that I recall, no.

20 Q All right.

21 [REDACTED] unless you have any questions about this exhibit, we can take this one
22 down.

23 Let's talk about the actual day of the 12th and sort of how the day went, and I
24 want to focus on the security aspect of the day. What do you recall about how crowd
25 control or security measures worked out on the 12th?

1 A So vaguely I remember a commitment to build a box for us. Afterwards
2 there, the only recollection I have -- and this should show up in the digital stuff that
3 you're going to receive, possibly -- report-outs of what people may have saw from out in
4 areas that we were not.

5 So in other words, hey, Capitol Police captured a antifa person. They took them
6 two blocks, cut their little zip ties loose, and then they came back in 5 minutes. Those
7 kind of things.

8 I do vaguely remember hearing things like that, but, again, I'm down in the salt
9 mine, doing the -- doing volunteer stuff near the stage. So my peripheral would've been
10 limited for the -- for the broader area.

11 Q When you used the word report-outs, I think -- and I don't want to put words
12 in your mouth or --

13 A Yeah.

14 Q -- correct me if I was wrong -- do you mean, was that like a specific
15 document or a specific report, or you just mean you heard people talk about it?

16 A No. So people want to tell you about their experiences, right, because you
17 haven't been around people all day. So when I say report-outs, audibly people
18 squawking off about the things they saw. Hey, look, for all I know, it's all
19 embellishments, but this is -- you got to hear people out. They're volunteering for you,
20 right? So.

21 Q And I was asking about your use of the term report-out just because I'll
22 represent to you -- I know you weren't familiar with the group 1AP, but we looked at
23 some of those chat messages, and in some of those messages, there were specific, like,
24 1-page reports of security incidents that were sent to folks involved in the security team
25 for Women for America First.

1 A Right.

2 Q But I take it, that's not what you're talking about, and you're not familiar
3 with those reports?

4 A Yeah, no. I actually am familiar with those reports. I'll tell you why.
5 Because much like you asked me earlier, I was curious just for instance, what happened
6 with the guy in Tennessee, the Molotov cocktail guy. So I know that the organized
7 security groups, whoever they may have been at any given time, did dailies, like daily, you
8 know, "here's what occurred today" type thing.

9 That may be what you're -- I'd be speculating, but that may be what you're saying
10 or it may not, but they did make daily reports to the security -- the security teams.
11 Because I remember them talking about it being a pain in the -- the butt, so.

12 Q And did you ever end up seeing any of those reports?

13 A Above my pay grade, yeah, no, unfortunately.

14 Q For the November 14th event, I had asked you some questions about people
15 you might've talked to or interacted with that you can remember. I want to ask kind of
16 the same set of questions specifically for December 12th.

17 Do you remember talking to or interacting with any people that you identified as
18 Proud Boys?

19 A I don't know if it was December or November or -- it was probably one or the
20 other. I do know at least on one occasion I walked downstairs from the Willard to see
21 just frankly what it was. You know, it sounded like a frat party. It was very loud.
22 We're many stories high.

23 So I do know I walked down at least once to, you know, take it in and see what it
24 was. I don't recall communicating with anyone, but I did go down once and try to get a
25 good look at that and see what it was.

1 Q All right. And then how about Oath Keepers, do you remember seeing an
2 Oath Keeper presence on December 12th?

3 A You know, I don't, but from everything -- I just don't. Like, I don't think
4 they had a look. It's easy to see a Proud Boy. They look a certain way. I don't
5 even -- you know. I don't know I'd know an Oath Keeper if they walked by my front
6 porch, you know, I don't -- I don't know.

7 Q Understood. And then one more time referencing those messages with
8 Ms. Kremer, Kylie Kremer, and the specific mention of Proud Boys at the Washington
9 Monument.

10 A Okay.

11 Q Do you remember going to the Washington Monument on December 12th at
12 all, or did you go?

13 A I don't recall going. I think, like I said before, I remember chatter or it may
14 have even been news, but I remember hearing about it after the fact, for sure. But I --

15 Q And I think we lost you there for that last bit of it. You said you don't recall
16 going there, and then you cut off.

17 A No. I said I don't recall going there, but as I told you before, I do recall
18 hearing about it after the fact, so.

19 Q Okay. [REDACTED] you have any other questions about December 12th?

20 BY [REDACTED]:

21 Q Yeah.

22 So I wanted to pull up exhibit 4 for you, Mr. Bowman. So this is a text message
23 that we received from somebody else with yourself and Don Thompson, and I believe it's
24 Dustin Stockton on the right. And this is from December 12th, although the date got cut
25 off.

1 So take those in reverse chronological order here, so I'll start at the bottom. And
2 a Vinny Caldera says, Alex Jones left the, quote, reality building, close quote, a long time
3 ago.

4 A Okay.

5 Q Don Thompson says, did he just leave. I'll be happy to follow him so we can
6 keep the intel so he could get -- he could be arrested. And you say LOL, in a police car.

7 Do you have any -- what do you recall about Alex Jones on December 12th?

8 A I got to tell you, there was -- and, again, I'm going from memory here.
9 Maybe my documents will be more responsive, but I remember, if I'm not mistaken, there
10 being some kind of incident with Kylie and Alex Jones. And, again, I think maybe he may
11 have been removed from the premise of the Willard. I don't know, but there was
12 definitely an incident of some type between those two. Beyond that, the more
13 you -- the more you show me here, maybe the more I can remember. Is it further down
14 or --

15 Q No, this is it.

16 A This is it? Yeah.

17 Q Yeah.

18 A There was something -- and, again, when I say November, December, I could
19 easily misrepresent, I'm going off my memory, but I do believe there was an incident with
20 Kylie and Alex Jones at some point, yeah. That's probably what this is.

21 Q Were there any incidents before December 12th between Kylie and Alex
22 Jones?

23 A Yeah, I don't know. I don't know what the history is there.

24 Q Was Alex Jones sort of a persona non grata for Women for America First?

25 A No. What do you mean? Sorry.

1 Q Like someone they didn't want to interact with.

2 A No. I mean, I don't know. I just, you know, I know what I know of Alex
3 Jones like you do, and I don't know what their personal relationship entailed, honestly.

4 Q Okay. Then I'm going to go back to exhibit 14 -- and, again, this is the
5 Nakatomi Plaza Reunion chat -- page 18, and this is December 1st, Robert Lewis says, also
6 Cindy -- and Cindy Chafian, and somebody else, please be aware we got confirmation that
7 Alex Jones is planning on being in D.C. on that date. Potential exists that our,
8 quote/unquote, friend may tag along as well.

9 And Cindy talks about later, thank you, we expected this. The friend is coming
10 back to Georgia after learning we are heading there Thursday. They can't stay away.
11 Two smiley faces, Emojis. Do you know who the, quote/unquote, friend was?

12 A Yeah. I don't have visibility of that. I have no idea. I'd be speculating.

13 Q All right. Do you have any -- do you know who Ali Alexander is?

14 A From the news and from chatter, I've heard, but yeah, I don't know him, no.

15 Q And were you involved with any conversations with people -- with Women
16 for America First people about Ali Alexander?

17 A I'm sure there's got to be something responsive in the forensic stuff. Being
18 all of the issues that happened between the two groups with the permits, there's bound
19 to be something that's happened. I mean, I don't remember anything specifically, but
20 there's probably some- -- you know, at least in the group message, I'm sure there's
21 something.

22 Q Okay. That's fine. There's nothing to sticks out to your mind in terms of a
23 conversation about Mr. Alexander?

24 A Not here and now, no, sir.

25 Q Appreciate it. So then in terms of the First Amendment Praetorian, did

1 anyone on the Women for America First, maybe later in December, tell you not to work
2 with the First Amendment Praetorian for the January 6th event?

3 A I got to tell you, I don't recall the group, much less the conversations hardly
4 at all, so I don't think -- no, I don't think so, no.

5 Q Okay. And before January 6th then, you did not work with First
6 Amendment Praetorian for any security matters?

7 A Not that I can recall here and now, not from my recollection.

8 Q Okay.

9 BY [REDACTED]:

10 Q Before you finish with December 12th, I had some questions. I don't think I
11 had asked you specifically about Mr. Liggett's presence or activities on the 12th.

12 A Okay.

13 Q Was he there on the 12th?

14 A I believe so, yeah. I'll answer that, and then I'm going to have to get some
15 more coffee if that's okay, guys. I'm sorry, I'm just, like -- so what's the question about
16 him? Was he there on the 12th? I believe so.

17 Q Was Phil Liggett, there on the 12th?

18 A Yeah. Yeah.

19 Q Why don't we, you want to take a quick 5-minute recess and you can grab
20 your coffee and --

21 A Well, is that it for that question? I mean, I can complete the --

22 Q Sure, I can ask you some more.

23 A Yeah, yeah, yeah.

24 Q Okay. We'll finish up with Mr. Liggett, and then we can take a break.

25 A Got it. Appreciate it.

1 Q What do you --

2 Mr. Warrington. I think you got crossed there. So I guess we're taking a break.

3 [REDACTED] Let's take a break. It's 11:48. We'll try to come back at 11:53.

4 Mr. Warrington. Okay.

5 [Recess.]

6 BY [REDACTED]:

7 Q We'll go back on the record.

8 So I believe before we went on break, we were talking about Mr. Liggett and kind
9 of his activities on the 12th. And earlier you had told me he did -- he kind of performed
10 the same function. You reached out to him to gather a group of sort of informal security
11 folks who could set up the box or the perimeter. Is that right?

12 A Yeah. Best of my recollection, yeah.

13 Q And did you see him there on the 12th?

14 A Did I see him in D.C. on the 12th?

15 Q In D.C. on the 12th.

16 A I believe so, yeah.

17 Q And was he actually part of the box or perimeter as far as you recall?

18 A So I was just thinking about that. He spoke at one event, but I don't know if
19 it was in December or January, and whichever event he spoke at, he would've, of course,
20 not been on the perimeter because he would've been down by the speakers.

21 So I can't say definitively. I believe he spoke in January, which means in
22 December he should've been on the box. Best of my recollection, I would say he was
23 probably on the box, yeah.

24 Q And do you remember any conversations with him about any of those
25 groups that we've run through a few times -- Proud Boys, Oath Keepers, First Amendment

1 Praetorians, or other Three Percenters?

2 A Yeah, I don't -- I don't recall any conversa- -- usually when I spoke to him, it
3 was just very quick to arrange whatever. But if I had anything, I'm sure it would've been
4 electronic, and maybe it will be responsive, but I don't recall anything.

5 Q All right. Then that's all I have about Mr. Liggett. So, [REDACTED] if you
6 want to move to the 6th.

7 BY [REDACTED]:

8 Q Yeah. Actually, I'm going to stay on the 12th for a second.

9 Mr. Bowman, I'm going to show you exhibit 7, and although my name appears on
10 this, this isn't an email from --

11 A You were there too?

12 Q Yeah, right. This is just how it printed. This is an email from a Matt M.
13 Wingard gmail. It looks like, you know, an automated email, and it's sent out to Tyrant's
14 Curse. What is Tyrant's Curse?

15 A So it's like a blog. You see how it says dot substack?

16 Q Yeah.

17 A So dot substack is where people create blogs. I mean, just everybody,
18 right? And so Tyrant's Curse was a blog that Stockton had.

19 Q Okay. Great. And it looks like the first email that's sent, Dustin Stockton
20 from Tyrant's Curse email was on December 16th, 2020. And I'm going to take us to
21 page 8. So he included this photo in the email.

22 A Right.

23 Q Sorry to zoom out for a second. Dustin Stockton, he calls him, I guess,
24 Bossman, and you, Charles Bowman, on an elevator with the Three Percent team in D.C.

25 A Uh-huh.

1 Q So do you remember taking this photo in Washington, D.C.?

2 A I do, but I don't think it was December. I think it was November.

3 Q Okay. Do you know who's in the photo with you -- and is that you in the
4 front, Mr. Bowman?

5 A Yeah. Yeah, that's --

6 Q Okay.

7 A -- come on, look at that face, that's -- the -- so I can tell you who is in it that
8 their face is uncovered. Me. The far back -- yeah, thank you, zoom in. The far back,
9 Stockton. Far back middle is Robinson. That's the person you spoke about earlier,
10 Matthew.

11 Q That's the guy with the beard, smiling?

12 A Yeah. That's who I can say definitively, because their face is uncovered.
13 Beyond that, I wouldn't, you know --

14 Q Right.

15 A Yeah, those three for sure. Me, Stockton, Robinson.

16 Q Had you met these individuals previously?

17 A Yeah. Yeah, absolutely. This is some of Jeremy's group.

18 Q Okay. So they're Guardians of Freedom?

19 A I don't know if all of them are, because some of their faces are covered, but
20 some of them, like Matthew -- actually, I don't even know if Matthew was a Guardian of
21 Freedom. If Matthew was a Guardian of Freedom member, then him. I, of course,
22 wasn't. Stockton wasn't. So the rest of them being covered, I can't say definitively, but
23 I'm sure some of them were.

24 Q So when Mr. Stockton wrote, with the Three Percent team in D.C., to your
25 knowledge, he's referencing Mr. Liggett's group in this elevator?

1 A Yeah. I mean, I see what you see. I don't want to speculate on what he's
2 writing there, but, yeah.

3 Q So to your knowledge, these were Three Percenter -- individuals who
4 identified as Three Perceners in this shot?

5 A I can't speak for how they identify, but I do see the garb in the picture, if you
6 zoom in.

7 Q Yeah.

8 A See the patch?

9 Q Yeah.

10 A But then again, there were 5-year-olds walking around with Three Percenter
11 hats, so it's an ideology, so.

12 Q Right. So -- let's see. You think this might've been November, though, to
13 your memory?

14 A I think it was November. I could be wrong, [REDACTED] but I think that was
15 November.

16 Q And this was the team that was providing the box?

17 A Most likely. At least some of them.

18 Q Great. Thank you. So you said Dustin Stockton was not a member of
19 Guardians of Freedom to your knowledge. So you were not aware that he joined -- this
20 is exhibit 9.

21 A Okay.

22 Q This is an email from a Tarra Hernandez who is -- and we'll scroll down
23 quickly -- she was an assistant lead administrator for the Three Percenter Guardians of
24 Freedom.

25 A Okay.

1 Q This email is to Mr. Stockton on December 30th, 2020. First, the Three
2 Percenter Guardians of Freedom, that is Mr. Liggett's group, correct?

3 A I know him as GOF, or Guardians of Freedom, but, yeah, it's the same.
4 Yeah, that's, uh-huh.

5 Q Do you know who Tarra Hernandez is?

6 A I met her, yeah.

7 Q And who is she?

8 A She was like an administrative-type person. I don't really know how to
9 describe her beyond that.

10 Q Do you know what her role for Guardians of Freedom was?

11 A All I know is that if I asked for something, if anything came back that was a
12 document or a communication that was organized in some manner, a list or anything, it
13 would come back through her. So that's why I was saying she's probably serving
14 in -- yeah, it even says, admin capacity, yeah.

15 Q Do you know if she had any role welcoming new members in the Guardians
16 of Freedom?

17 A No, but can I read the email? It's jumping around.

18 Q Yeah.

19 A I'm just trying to catch up on what --

20 Q That's fine. I don't think you were on this email, but here.

21 A Yeah. No, I'm just interested in reading it.

22 Q Sure. Try to make it bigger for you.

23 A Thank you.

24 All right. Scroll down a little bit.

25 Q Yep.

1 A Yeah. No, I mean, look, I guess that document speaks for itself. Does it
2 go down further, or is there more?

3 Q There's an attachment to it that's very zoomed in. This is, you know, the
4 Guardians of -- do you recognize this as the Guardians of Freedom actual logo, however
5 you want to describe it?

6 A Yeah. I mean, I'm familiar with that patch, yeah.

7 Q Yeah. And then the -- oh, the rest got cut off. There was an attachment
8 to it. That's not important for you. Did Dustin Stockton ever talk to you about joining
9 Guardians of Freedom?

10 A You know, I don't recall that conversation clearly. Not to my recollection.

11 Q Today, do you know if he is a member of Guardians of Freedom?

12 A No. I -- based on what you just showed me, I'm aware of it for about 2
13 minutes now.

14 Q And then in terms of, you see -- you noticed that you knew it as Guardians of
15 Freedom.

16 A Yeah.

17 Q Here we have the email Three Percenters, underscore, Guardians of
18 Freedom, and the first line is, welcome to Three Percenter Guardians of Freedom.
19 Sorry, the screen is a little bit in my way.

20 Was it your understanding that Guardians of Freedom was a Three Percenter
21 organization?

22 A No. Listen, that -- when you sent me my subpoena, that was one of the
23 questions I had. It was weird to me because I didn't know it as GOF Three Percent per
24 se. Ideologically perhaps, but I don't -- I did not identify them as a Three Percent
25 organization specifically to my recollection as a group.

1 Q And do you know if there are -- do you know of any groups that are Three
2 Percenter specific? You know, separate from what you're noting about the ideology?

3 A Yeah. So my -- my [inaudible] today is, you know, a year and a half later,
4 there's apparently a group nationally that is like a membership-based type group. I
5 don't know their name, but there's a group that is specifically the original, like, group.
6 Does that make sense?

7 Q Does the name the Three Percenter Originals ring a bell to you?

8 A I believe that might -- yeah, I believe that might be it.

9 Q But you were not aware of the group in January 2021?

10 A Yeah. So in January 2021, I was -- you see a lot of people running around
11 with ThreePer stuff on. And the chatter you hear is, oh, that's a real ThreePer, that's a
12 not. Well, that's just someone that adheres to -- so it's a real mixed bag. So I don't
13 know what I don't know.

14 But now sitting today, I realize there is a national group, and I believe it's the one
15 you just referenced.

16 Q So when you heard people saying that's a real ThreePer, that's a notter,
17 whatever, what did you take that to mean?

18 A Oh, I could tell you. You see 5-year-olds running around with hats on that
19 had -- you know what I mean? And then you'd see people from wherever that identified
20 as them. And you see people just attend the rallies. Maybe they bought a shirt 5
21 minutes ago, so.

22 Q And then what was a real, quote/unquote, real ThreePer to you?

23 A I mean, I wouldn't know because I'm not one, but as we sit here today, I
24 assume it's whatever the national group is.

25 Q Okay. When people are pointing out real ThreePers, did they wear gear

1 like we saw in that photo or patches? Was there something distinctive about their
2 character that made people say they were real ThreePers?

3 A I can't say why they would say it, unless you know, they identified them from
4 knowing who they are. But to me, many looked all the same except for the -- except for
5 the, hey, listen, you got a mom, a dad, three, four kids tugging along going to the rally,
6 and they're all wearing ThreePer stuff, you can make a safe assumption, probably not
7 ThreePers, right? But I wouldn't -- I'd be speculating, [REDACTED] to see it through someone
8 else's eyes, you know.

9 Q Understood. I was more wondering if anyone explained to you why they
10 would say it was a real ThreePer or if you had your own sense at the time of what a real
11 ThreePer was?

12 A Yeah, no, it was real muddy.

13 Q Sure. So in terms of Mr. Liggett himself, do you know if he was planning to
14 come to Washington, D.C. before you contacted him about providing, you know, informal
15 crowd management on January 6th?

16 A Yeah. So I believe, to the best of my recollection, that they were coming
17 regardless, and maybe my documents will be responsive as such, but I believe the group
18 planned on being there whether or not there was anything occurring with our group. So
19 I think they had intentions to be there, yeah.

20 Q Did you speak to Mr. Liggett about why he was coming to Washington, D.C.
21 regardless of your request?

22 A No. Not that I recall. I know that the narrative broadly, from memory,
23 was, everybody just wanted to come to D.C. to exercise their First Amendment right.

24 And I mean that on all occasions, not just January obviously, but every time people
25 just come to be heard.

1 Q So nothing specific about Mr. Liggett's intentions, though, or his group's
2 intentions?

3 A Not that I recall. Like I said, there may be something responsive in -- you
4 know.

5 Q Did you have any conversations with Mr. Liggett or anyone in Guardians of
6 Freedom on January 6th about why they had come, outside of helping you out?

7 A What was the last part? It's glitching real bad.

8 Q Sorry. I asked, did you have conversations on January 5th or 6th with
9 Mr. Liggett or anyone in his group about why they had come to D.C., you know, other
10 than helping you guys out with security, with the informal security?

11 A So it's a great question, and that I actually do recall. So kind of the
12 progression of it, [REDACTED] was, when you came in, in November to D.C., the first go-around,
13 it was like the wild, wild west. There wasn't a whole lot of orchestrated police presence
14 locally or anything like that.

15 Just to be frank with you, a lot of people who were just there eating dinner,
16 walking around, or minding their own business got hurt, and you can see that in the news.

17 So when December came along, D.C. had more Capitol Police, they had dump
18 trucks blocking the roads off a lot more --

19 Q Mr. Bowman, you're freezing up quickly. I think the --

20 A -- and, of course, in January it was even more security. Yeah.

21 Q Sorry. You froze up for a second as you were talking about December 12th.
22 So the last we heard was, there was more police presence, and you were about to talk
23 about maybe dump trucks. So do you want to pick it up there?

24 A Yeah, yeah. So what I'm saying is, in general, November, December,
25 January, it got progressively more organized from a local perspective, with the Capitol

1 Police, D.C. having maybe a handle on things, but it was very violent in -- in what you can
2 see in the news, November and December.

3 So I think -- and I'm just answering what I think, you asked me my opinion -- I think
4 a lot of people that were coming out, including Jeremy and them, who were going to
5 come regardless, were coming to just make sure that the entirety of -- of the area was
6 safe. Because you're hearing so many incidences of people getting picked off or picked
7 on, people who were minding their own business, maybe even local people in D.C.

8 So I do recall a narrative that, hey, let's go up there and let's get people -- if
9 people, especially older people, want to be escorted or whatever it may be, let's make
10 sure they're safe. And that is what I do recall, yeah.

1

2 [12:13 p.m.]

3 BY [REDACTED]:

4 Q Thank you very much for that. Yeah, that was helpful.

5 So this might confirm what you were saying. I'm going to show you exhibit 11.

6 This is a Facebook post by Mr. Liggett on December 30th. And --

7 A Okay.

8 Q See, 3 percent -- number 3, percent sign -- will show in record numbers in

9 D.C. The gloves are off antifa.

10 Was Mr. Liggett specifically talking about possibility of violence from antifa on
11 January 6th?

12 A Listen, I -- I would have to speculate what he was saying in his own post, but
13 I'll reiterate what I said earlier that -- that there were many incidences prior of people
14 getting attacked from various groups, yes. So possibly.

15 Q I'm sorry. I --

16 A That'd be a question for him, I guess I would say.

17 Q Yeah. I apologize for not being clear. I meant, in your conversations with
18 him on the 5th and the 6th, did he mention the possibility of violence specifically from
19 antifa?

20 A So, not that I recall specifically, [REDACTED] but I will tell you that, generally,
21 there's an ongoing concern and narrative of violence at any of these First Amendment
22 events. So possibly something will show on my communications that are responsive.

23 Q Understood. Thank you.

24 And did Mr. Liggett ever talk to you about how many Three Percent people were
25 showing up in Washington, D.C., on January 6th in your conversations with him?

1 A Not that I recall. And I would allude back to -- listen, hard to count them
2 even physically from there, because you don't know what you're looking at, right? But I
3 never had any conversation, to my recollection, of a number, no.

4 Q And in terms of his group, do you remember how many members of his
5 group came to Washington, D.C., on January 5th and 6th?

6 A So, no, not as a total number. I -- you said 5th and 6th, right?

7 Q Yeah.

8 A I could -- I could speculate from memory that we might've utilized a couple
9 dozen, thereabout, of volunteers on the 6th. But I don't know the number of people
10 who were physically present in Washington, D.C. I couldn't -- I couldn't tell you.

11 Q Okay. So Mr. Liggett didn't express to you that, aside from the people
12 helping you out, that there were other members of Guardians of Freedom in Washington,
13 D.C., at those events?

14 A I don't -- I don't know what the total number would've been. The way
15 the -- the way it -- the way it went was I just requested a quantity of just volunteer
16 individuals, right? So I never inquired, unfortunately, so I can't answer your question.
17 I never knew how many total people were there, no.

18 Q Okay. And he didn't tell you, for the record?

19 A Not that I recall, no.

20 Q That's fine.

21 So why don't we go turn back to specific Guardians of Freedom volunteers. I
22 forget if we asked you earlier, so I'm just going to ask again. Do you know if Mr. Liggett
23 was an Oath Keeper?

24 A Not that I'm aware of, no.

25 Q Was he a Proud Boy?

1 A Not that I'm aware of.

2 Q Do you know if he was a -- associated with other Three Percenter groups
3 besides Guardians of Freedom?

4 A I don't know for sure, no. I couldn't say.

5 Q Okay. Do you know if he belonged to any militia groups?

6 A Yeah, I really don't know the extent of his personal business. I can't -- I
7 can't say.

8 Q Understood. Thank you.

9 So generally about January 6th -- these are very general questions. As a -- you
10 know, helping out Women for America First, what was your understanding about what
11 the White House's involvement in organizing the rally was?

12 A Yeah. So up to January 5th, there was some sort of -- and we talked about
13 this prior -- issue with the permits. So -- and -- so best of my recollection, it split, if it
14 makes sense. There was a 5th event and a 6th event to appease whoever all the people
15 may have been in its entirety, right?

16 So the 6th event, which was the one you're referencing at the Ellipse, was
17 orchestrated by the White House side. And the 5th would have been, best of my
18 recollection, Stockton. So --

19 Q Got it. And when you say on the White House side, do you recall who
20 specifically was organizing for that day? Was it like Katrina Pierson, anyone else?

21 A Yeah, I don't know. All I know is, on the 5th, I met a -- 5th or the
22 4th -- Justin. And best I can -- best I can figure, Justin must've been the version of their
23 advance team, similar to like if we were running our own event, right? So that
24 was -- that was -- that was who I was introduced to as my contact. But I don't know
25 beyond that, like --

1 Q So for the record, you personally were not part of any conversations with
2 people besides, you know, Justin that were with President Trump's team?

3 A Not from my recollection, but if you'd like to take them one by one, I'll give
4 you a yes or no.

5 Q Well, do you remember -- that's actually fine. Did you ever, like, overhear
6 about any conversations that other people in Women for America First had with
7 members of President Trump's, you know, staff?

8 A Not that I recall here and now. But, listen, again, that's above my pay
9 grade, you know? But if you were to find anything of that in my electronic
10 communications, it would probably be in a group text.

11 Q Okay. Thank you.

12 And did you know about whether -- ahead of January 6th, had you heard that
13 President Trump wanted to march after his speech on the Ellipse?

14 A No. I -- I -- listen, I wasn't even aware there was going to be an Ellipse
15 event until 24 or 48 hours prior. I don't -- I don't recall hearing anything about marching
16 down, no.

17 Q And just personally, what did you take the purpose of the January 6th event
18 to be?

19 A What did I take the what? I'm sorry.

20 Q The purpose of the Ellipse rally to be.

21 A Listen, I think the Ellipse rally was just another First Amendment rally. And
22 what I primarily heard -- do you mean from the perspective of the people that attended it
23 or the people that ran it?

24 Q Sorry.

25 A Yeah.

1 Q From your view, what did you think the purpose of, you know,
2 President Trump giving the speech and holding the rally was for?

3 A Yeah. I -- I don't know what I would say that was -- what it was for
4 specifically. Initially, it was -- before it split, right, into two events -- before it split into
5 two events, there were a lot of speakers and a lot of different people, a lot of different
6 viewpoints.

7 But when it split down to January 6th being what it was with the limited speakers
8 and the limited event, seemed to me just like a place that they could do their event that
9 had visibility for enough people to come. You know, the monument runs all the way up
10 the hill. So I don't know, to answer your question, yeah.

11 Q All right. Did anyone in Women for America First talk about, you know,
12 what they expected -- or what they took the purpose of the January 6th rally to be?

13 A Yeah. So with -- with the January 6 thing, I think we were all kind of just
14 hearing it in real time. Like I say, before there was the permit issue, the narrative was
15 there was a very structured kind of speaker list and a variety of different people trying to
16 come and talk on a variety of different topics. But January 6th, at the Ellipse, was
17 almost spontaneous, because getting it arranged, getting it set up, getting everything in
18 the timeframe they did it, I don't even know if they were sure what -- what the event was
19 going to look like.

20 Q Understood. Thank you.

21 So we'll go back a little bit to the -- getting the help from Jeremy Liggett. So I'm
22 going to pull up exhibit 5. This is a text message chain --

23 A Uh-huh.

24 Q -- on January 2nd. It has Kylie Kremer --

25 A Uh-huh.

1 Q -- mommagrizzly, who I can represent to you is Amy Kremer --

2 A Okay.

3 Q -- Jennifer Hulse, and yourself.

4 First of all, I'll let you read a little bit, but we can scroll --

5 A Can you zoom it in a little bit, [REDACTED] just because --

6 Q Yeah.

7 A I apologize.

8 Q Again, unfortunately, it goes bottom to top, so --

9 A No problem.

10 Q -- I'll take you down.

11 So it starts on January 2nd, 11:29 a.m. Amy Kremer says, Ladies, I just talked to
12 Bowman, and he's going to get us 10 marshals. He's on this text message. Thank you,
13 Bowman.

14 A Uh-huh.

15 Q And you have some, you know, congratulations, yay.

16 And here at 11:31, Kylie Kremer says, Do you want us to handle the 30 volunteers
17 under the marshals? You will be lead marshal, unless you want someone else to be.

18 So you say, Sit tight. Let me see if I have 40 people who will pass the background
19 check.

20 What was the background check that you were talking about?

21 A So kind of more to the point, I think they initially said, Hey, I need like 5 or
22 10 or -- the number kept going. So I don't know what the total number of people were
23 who I could, you know, inquire through Jeremy to get a number of volunteers. But
24 being as it was going to go on the White House grounds, that reference is, hey, let me
25 see, A, who's here, and, B, if there's enough people responsive to what they're requesting

1 who will pass a background check, just anticipating there being, you know, a full
2 background check on anyone that will be on the grounds.

3 Q Okay. So you weren't aware of a background check process that was
4 required, but you were anticipating that the possibility of one happening?

5 A Yeah. So my communications were from Hulsey and back to Hulsey. And
6 from there, she was going to handle whatever that looked like. Yeah, I don't know.

7 Q Got it. Thank you.

8 All right. So if we scroll up a little more, it's just a little bit of back and forth
9 about numbers. You'll see Jennifer Hulsey at 1:01 p.m. on January 2nd, says, Just talked
10 to Justin. Can we get 50 volunteers?

11 So this is, I think, what you were talking about, the numbers keep changing a little
12 bit.

13 A Yeah, I remember it changing, yeah.

14 Q So you mention at 3:19, I have 34 that will pass background.

15 And here we're back at the top.

16 So at 3:48, you send this list. And let me just zoom in a little more for you.

17 You send a list of 10 people who can be marshals. And we've talked about
18 Mr. Liggett and Matthew Robinson --

19 A Uh-huh.

20 Q -- and Tarra Hernandez.

21 A Uh-huh.

22 Q Did you get these names from Jeremy or were they names that you knew
23 already?

24 A Yeah, no. This is -- these are Jeremy's people. Some of them I knew of or
25 knew, but, yeah, they're -- that's Jeremy's group. I'm looking at the list now.

1 Q Okay.

2 A Walter, Timothy -- yeah. Yeah. These are -- these are his people, yeah.
3 It should be diced into two sections. Go down.

4 Q Yeah.

5 A Straight volunteers, and then marshals.

6 Q Yeah. So these 10 would be marshals.

7 And can you quickly explain what the difference between a marshal and a
8 volunteer would be?

9 A Yeah. So I think the intent was that -- and, look, I hate to make it sound as
10 disorganized as it was, but I think the intent was that marshals would reside more
11 towards the front of the event and then help people get to their seats towards the -- you
12 know, more towards the back, towards the stage.

13 And I think the volunteers in general was just to have X amount of people -- just to
14 have X amount of people. We don't really know what we're going to use them for, but
15 better to have them in -- better to have them when you need them, right, than need
16 them and not have them. So that's the -- 10 were seating, and whatever the balance
17 was there was for just general purpose.

18 I will say that isn't the entirety of the list. My recollection is 50 or 60 people
19 total.

20 Q Okay. Who was asking -- you know, we saw that Justin asked for 50. Who
21 was it -- what was your understanding of where this request was coming from?

22 A Yeah. So, listen, I think the whole Ellipse thing happened so fast that Justin
23 had a -- you know, look, there -- he bit off a lot. He had to make a lot of things happen.
24 So I think Justin -- and I'm speculating, right? You asked what I think -- probably reached
25 out, said, How many people can you get me that would just help me, help me with this

1 thing, because I'm just throwing it together, right.

2 Beyond where he would've gotten any directives from, that's for him to say. I
3 wouldn't know, [REDACTED] I'd have to -- I'd have to guess like you, so --

4 Q All right. And was it your expectation that these individuals would provide
5 some sort of security role or was it more of a crowd assistance role?

6 A No. Listen, the -- the -- again, this is one of the deals where security was, I
7 think, Allied. Allied rings a bell. I think they had a paid-for security, Allied, there. I
8 mean, it's on the White House grounds, [REDACTED] so they've got Secret Service galore.

9 So I don't think they had a real security need so much as they had a -- again, just
10 a -- a need for volunteers and -- they didn't know why. We just wanted to have them on
11 hand, right? Some to seat people, some to do God knows whatever comes up, you
12 know. You just don't know what you don't know. Just have people, so --

13 Q Sure. And do you personally know these 10 individuals or only some of
14 them?

15 A I know most of them. Yeah, I know Liggett. I know Robinson. I know
16 Hernandez. I know Preller. I do not know the Joseph guy off of the name. I know the
17 Clarke. I know of the Adams. I'm having trouble putting Walter in my head. Sharp, I
18 know. Summers, I know of. So, yeah, probably six or seven of them I know, yeah.

19 Q All right. Mark Andrew Clarke, do you know if he's a member of any militia
20 group?

21 A So Mark Clarke is GOF. And beyond -- beyond that, you know, I
22 don't -- listen, I don't know what you would define as a militia group or what entirety of
23 his business is, but he's definitely a Guardian of Freedom.

24 Q Actually, you anticipated my next question. Would you consider GOF to be
25 a militia group?

1 A I wouldn't consider GOF to be a militia group. I would consider them to be
2 a -- a patriot type group.

3 Q And what's the difference?

4 A The difference? You know, look, I would say -- you know, I don't personally
5 know any militia groups, so you're asking me my opinion. I would say a militia group
6 probably would be a more organized group. A patriot group would be people that align
7 with love for one's country. And I'm sure there's a lot of gray area between the two.

8 Q Okay. A lot of groups, you know, love their country, so I'm just wondering
9 why --

10 A That's what I'm trying to say, yeah.

11 Q -- specifically defining GOF as a patriot group. most -- is there an intent
12 behind using that word besides what you just described?

13 A No, no. I remember, a long time ago, a conversation I had had with Liggett,
14 and Liggett was saying, hey, listen, let me put you in a group to give you the visibility to
15 what -- what this group's all about, because you just don't know what you don't know if
16 you don't belong to a group, right.

17 And when I say patriot, I just mean God-fearing, country loving people. And
18 that's what they always looked like, smelled like to me, just salt of the Earth people.

19 Q Okay. So it was sort of -- you had -- "vetted" might be too strong a word,
20 but you were at least comfortable bringing these individuals into a White House event?

21 A Yeah. So with -- with Liggett, I always say, Hey, man, here's what I need.
22 Let that be at his discretion, because, again, they're his people, so he knows them better
23 than me. I think the background -- take you the rest of the way, right?

24 But some of those groups of chat rooms or Telegram, for instance, that I was put
25 into, you're talking about hundreds or thousands of people in there. So these guys

1 specifically, I trust Jeremy's -- Jeremy's opinion. The broader group in there, I don't
2 know that anybody could vet everybody. That's -- that's too big of a number of people.

3 Q Were you put into other chat -- Telegram chats besides the Guardians of
4 Freedom one?

5 A Yeah. So I -- you know, I don't recall. I'll tell you this. Do you use
6 Telegram, [REDACTED]?

7 Q I -- I've seen it.

8 A So it's like a messaging app, but I think what differentiates it is people can
9 just grab you once you're on there and toss you into things, you know, if they think you
10 might have a interest, right?

11 So I don't know what I was in, I really don't, or what still exists. But I do know
12 that there was one group, relatively large, hundreds if not thousands of people that was
13 in it, that was a patriot type label. I don't know the name of it. Maybe you do. And
14 that's what I would mean by saying patriot. Just people that -- God-fearing, country
15 loving.

16 Q All right. Now, do you know if any of these 10 individuals besides -- we saw
17 Ms. Hernandez' role. Do you know if any of them had like an official role for Guardians
18 of Freedom?

19 A Let me look at it again.

20 Q Sure.

21 A So -- yeah, so I'd say Liggett was the -- the head person.

22 Q Yeah. Oh, sorry. He's the founder.

23 A Yeah.

24 Q You don't think Matthew Robinson was in, as far as you knew?

25 A I don't know if he was actually in it or not, but he's such a close friend to

1 Liggett that -- I don't know if he played a role in it. Hernandez would have been the
2 administrative person we spoke of.

3 And looking at everyone else, no, I'd say just probably general members.

4 Q Great. Thank you.

5 And then I'm going to show you exhibit 13.

6 You see exhibit 13 is an email from Megan Powers. Do you know a
7 Megan Powers?

8 A Not that I recall.

9 Q That's fine. Sent to Jennifer Hulseley, a couple of others, and cc'ing
10 Justin Caporale and Kylie Kremer.

11 A Yeah.

12 Q There was an email on the 4th. Jennifer says, Megan and Justin,
13 Katrina -- who I can represent to you is Katrina Pierson -- do you remember the
14 name -- does the name Katrina Pierson now ring a bell in terms of helping organize
15 January 6th?

16 A I think you mentioned her earlier, and --

17 Q Yeah.

18 A Yeah. I don't -- I don't have any recollection of it, but I've heard that name,
19 yes.

20 Q Okay. So Jennifer is saying, I've copied and pasted the first group, and it's
21 attached the marshals and rest of our volunteers.

22 A Uh-huh.

23 Q And Charles Bowman will be onsite Tuesday at 3 p.m. -- so Tuesday was
24 January 5th -- to go over what you need from them and will make sure they do what is
25 needed.

1 So first question is: Were you at a meeting on January 5th with the marshals and
2 volunteers?

3 A Yeah. So you remember Justin? I had the conversation with you about
4 Justin.

5 Q Okay.

6 A So the meeting on -- what does it say? The 4th?

7 Q January 5th.

8 A 5th. All right. So the meeting I went to was in the field there where the
9 thing was going to be. But it wasn't set up yet, so Justin was trying to get the logistics
10 of, hey, I know you don't see it now, but the front will be over there. This is where the
11 setup will be for the rest of the stage. There's going to be seats here. There's going to
12 be, you know, bike racks here.

13 He was just trying to -- I mean, God bless him. He was trying to get it all
14 together, but he was -- he didn't have anything to show me, so he was meeting with me
15 to kind of walk me around and say, this is what it's going to look like. I do recall that,
16 yeah.

17 Q Okay. And was he asking you -- or telling you what he needed for the
18 marshals and volunteers to do?

19 A No. Like I say, he was just -- to me, it seemed like he was just wanting to
20 have access to as many volunteers as he could get his hands on, like maybe he was still
21 scoping out, you know, what his needs were. So, I mean, you're asking me to speculate.
22 That's what I would say.

23 Q All right. But in terms of the meeting, then, did you take away any
24 information from it other than what the stage would look like and the setup would look
25 like?

1 A Yeah. I had a decent idea of what the perimeter of it would look, that he
2 was going to want some number of people for sure to help seat people. And then just
3 beyond that, hey, look, be aware that subject to change, right? Ask me in -- ask me in
4 an hour kind of thing. So --

5 Q Okay.

6 A -- that's about the extent of it.

7 Q Did he ask you to get the marshals or volunteers to do any sort of box or
8 perimeter?

9 A No. The -- the perimeter was all Secret Service, so --

10 Q Okay. Yeah. Understood. Thank you.

11 So this is the, looks like, volunteer list No. 1.

12 A Uh-huh.

13 Q And do you recognize these top three names?

14 A I recognize Julia and I recognize Rick. I do not recognize the third person.

15 Q Are the first two that you recognize, are they Guardians of Freedom
16 members as well?

17 A No. No.

18 Q Did you -- did you independently find these people or did Mr. Liggett give
19 you these names too?

20 A No. So there was a -- like I say, I think the group was 50 or 60 people, so
21 some portion of it was completely external to my visibility. They just showed up. So I
22 don't know where they came from, [REDACTED]

23 Q Gotcha. How about -- highlighted for whatever reason -- Jesus Rivera?

24 A Doesn't ring a bell, no.

25 Q Sure. Any -- a Jessica Rivera?

1 A Huh-uh.

2 Q Okay. Just let me know -- I'll scroll slowly -- if you see anyone else that --

3 A Yeah, yeah.

4 Q -- that you remember.

5 A Yeah. It must be a list from a -- the secondary group or --

6 Q Right. Another highlight here, Mike Pope?

7 A I personally know a Mike Pope, but that is not -- that is not the Pope I know.

8 Q Is 831 a Florida area code? Obviously --

9 A I believe 813 is Tampa area, yeah.

10 Yeah. No, [REDACTED] I think that's a list of the other people that made up the group
11 in its entirety.

12 Q Got it. Appreciate it, Mr. Bowman.

13 So then, similar to how [REDACTED] asked about the other two rallies, why don't
14 you just give me your, you know, broad overview of what you did on January 6th and
15 what happened, and then I can ask some more specific questions after that.

16 A Listen, this is going to sound -- hope you don't laugh at me, but -- so what we
17 did basically on January 6th was stand there, look at bike racks, freeze to death, starve to
18 death. They didn't even feed us lunch. Like, we sat there for -- gosh, it must have
19 been 8, 10 hours. I don't know how long it was.

20 And we arrived before the sun came up, sat there, did a whole lot of nothing,
21 other than try to secure those bike racks to make sure that, you know, people aren't
22 coming in and out of them. By that, I mean there's a perimeter --

23 Q Uh-huh.

24 A -- beginning with bike racks. Any logical person will probably zip tie them
25 together or in some way make sure that one rack attaches to another. Well, none of

1 them were attached, so we stood there and played the part of attachment, and literally
2 froze to death, starved to death all day.

3 Q So let me be clear then. You mean like at the back -- so the Ellipse
4 had -- obviously had its own perimeter of bike racks, and you guys were --

5 A Yeah.

6 Q -- sort of standing at the back?

7 A [Inaudible] is the perimeter. Inside of the actual event up to the front part,
8 there's actual seating. So visualize -- I'm sure you've seen it, but there's seats. And
9 then there's kind of a -- a big grassy area where anybody can stand, right?

10 Well, the section that had the seats, that section was surrounded by bike racks.
11 None of the bike racks were interconnected, so just trying to make sure that that all
12 stayed together and that they weren't all moved or removed or whatever it was. And,
13 you know, I wish it was more interesting, but --

14 Q Well -- so you listened to President Trump's speech then?

15 A I heard -- I heard things. You know, listen, I -- the content wasn't a concern
16 of me. What I was concerned about was where I was going to find a cheeseburger and
17 when I was getting out of there. We were freezing to death. It was freezing cold,
18 yeah.

19 Q So then, what did you do after you left -- or, I guess, when did you leave?

20 A It was at the end of the day, and I'll let you guess what we did after standing
21 there all day starving to death.

22 Q I imagine you went to go find some food.

23 What time did you -- what time did you leave the Ellipse?

24 A I don't recall what time, but when -- when we left, you are correct, by The
25 Willard and then to the McDonald's, straightaway. And that was -- that was, frankly, all

1 of our concern. We hadn't eaten all day.

2 Q And after McDonald's, where did you go?

3 A It was a nearby hotel. I don't know which one. It wasn't The Willard. It
4 was a -- I don't know the name of it, [REDACTED] but we went to a hotel.

5 Q Okay. Were you with Kylie Kremer or Jennifer Hulseley at all in the afternoon
6 on January 6th?

7 A So you mean at the event or before the event or after the event, anytime --

8 Q Sorry. After the event.

9 A Got it. I'm sure of in passing in the afternoon. Definitely by the evening.
10 I recall that the -- yeah. I came back to The Willard. I was definitely there that
11 evening, because the -- the Mayor did a curfew, and I just recall where I -- where I was
12 when the curfew went in place. So I was definitely back with the group, yes.

13 Q Got it. Did you head out to the Capitol at all that afternoon?

14 A No. I was not at the Capitol.

15 Q Didn't go towards the Capitol Grounds, correct?

16 A I was -- I was not at the Capitol, correct.

17 Q All right. So what were the conversations like with the Women for America
18 First people on the night of January 6th?

19 A Listen, man, everyone was just trying to figure out what the heck happened,
20 like, what went -- you know, what went so sideways? So -- it's a blur, but I do remember
21 everyone being like, what in the world? What happened?

22 You know, our hotel was surrounded by -- [REDACTED] it had to be a hundred police
23 cars. So people -- why is our hotel surrounded by police cars? You know, are we safe?
24 What the heck just happened? And a lot of disbelief, yeah. So --

25 Q Did anyone express a feeling that they -- that Women for America First was

1 partially responsible for what happened?

2 A No. Much the opposite, actually. Any emotion I witnessed was more
3 anger at -- at -- anger and disbelief at, you know, what happened, who's responsible for it,
4 and -- and -- and why were -- why were things the way they were, so --

5 Q And who was that anger directed at?

6 A Well, that's -- that's the thing. Nobody's really sure where to direct it.
7 Everyone -- everybody wanted to know what happened, you know?

8 Q Did anyone put some fault on President Trump's lap for what happened?

9 A Not that I recall, but you have to appreciate something, [REDACTED] You know,
10 the people that are affiliated with this Women for America First group are at The Willard.
11 The Willard is essentially next door to the -- to the White House. This thing came to
12 pass. You're inside a place that has everything but a violin. It's a different world.
13 Whatever is happening down on the streets or out and about, if you were someone that
14 were staying over there, you'd have very little visibility to it.

15 So what I'm trying to say is the shock and awe factor of it probably came from the
16 insulation of everyone who was there at that group in that five-star setting versus
17 whatever is going on down in the streets of D.C. at that time.

18 Does that make sense?

19 Q Somewhat. But were you watching what was happening on TV?

20 A I do recall passing a TV -- I don't recall where -- and just kind of seeing news
21 blurbs. I've got -- I know how ridiculous this sounds, [REDACTED] but I wanted to get
22 something to eat. That was my primary focus. I would've eaten anything.

23 But that's where we went right away, got over there, got something in the belly,
24 and, you know, beyond that, I think a lot of people didn't know what was going on till way
25 after the fact, so --

1 Q So then just walk me through what you can remember about the
2 conversations. Were people in Women for America First that night, were they -- were
3 they blaming, you know, anyone in the White House? Were they blaming antifa?
4 What were people speculating about what had happened?

5 A So the -- when you say the people, I'm going to reference what I know to be
6 the suite, right?

7 Q Yeah.

8 A So we all have rooms, right, but there's a suite where, if anytime people
9 need to meet up as a group, you all can meet in there. Maybe some nonsecurity related
10 meeting or maybe you're eating dinner, whatever.

11 In this suite on January 6th, the mood was kind of somber, angry, intrigued, but I
12 don't recall hearing anyone placing blame on anyone speculatively by a man that I recall
13 here and now.

14 I just remember a profound sadness in the suite itself, you know? And the
15 reason I identify that, [REDACTED] is because my family was in D.C. My kid was in that suite,
16 and I'm trying to monitor what my kid's been exposed to. And it just felt like a lot of,
17 you know, anger and sadness. So --

18 Q Yeah. That's understood.

19 A Yeah. Yeah.

20 Q So you're at The Willard then. Did you ever see Steve Bannon in there
21 while you were staying at The Willard?

22 A I did once, yeah, in passing. He was coming out. I don't know what day.
23 I don't know if it was January or if it was December or what it was, but -- because The
24 Willard was the hotel each time, right.

25 But I remember Bannon exiting The Willard one time. And, of course, everybody

1 knows Bannon when you see him, right? And it was in passing. I don't know where he
2 was coming from, but I did see him.

3 Q All right. But you didn't have a conversation with him? He didn't say
4 anything to you or to anyone around you?

5 A Oh, yeah, no. I mean, I didn't have a conversation with -- I didn't have a
6 conversation with him personally, no. He was literally walking by.

7 Q All right.

8 A Yeah.

9 Q So were you aware of the Chafians having a -- like a security room in the
10 Willard, where they had meetings with people about security concerns?

11 A So I can tell you that the suite, right -- visualize a suite, common area, and
12 then wings on either end of it. What I know to be security meetings -- other words,
13 where I can't go -- was off to the left of one of the suite wings.

14 Now, if there was a secondary place exclusively for that, I'm unaware of it. But
15 anytime I was shooed away was off the wing of one of the primary things there. That
16 seems to be where a lot of the closed-door stuff went, yeah.

17 Q Got it. And did you ever see Rudy Giuliani go into one of those rooms?

18 A No.

19 Q Okay. And then, you know, just a very broad question. You know, looking
20 back at January 6th, what are your thoughts today about what happened?

21 A Man, I -- I figured you might ask that, and I've given some thought to it. I'm
22 still trying to -- to -- still trying to sort out what happened in its entirety that day. I
23 don't -- I don't know that you can condense that down into a single statement. I really
24 don't.

25 Q Yeah. Well, I appreciate it, Mr. Bowman.

1 [REDACTED] Unless anyone else on the Webex has any follow-up questions, if
2 [REDACTED] does.

3 Not seeing anything, Mr. Warrington, is there -- oh, very good.

4 Mr. Warrington, is there anything that you'd like to put on the record before we
5 finish up today?

6 Mr. Warrington. No. I saw [REDACTED] -- I guess [REDACTED] popped on just to say he had
7 nothing further?

8 [REDACTED] Yeah. And you're all set?

9 Mr. Warrington. Yeah. The only thing that we would do is note an objection to
10 continuing the deposition, having to do it again after production of documents. So, as
11 you know, we tried to do this all in one shot to be efficient for everybody, but -- so we'd
12 just like to note our objection to continuing the deposition.

13 [REDACTED] Objection is noted.

14 We will leave the deposition record open and wait for your production, and then,
15 you know, see if we have any followup after that.

16 So, subject to the call of the chair, we'll leave the -- this deposition in recess, and
17 go off the record.

18 [Whereupon, at 12:55 p.m., the deposition was recessed, subject to the call of the
19 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