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

INTERVIEW OF: RICHARD WALTERS

Wednesday, May 25, 2022

Washington, D.C.

The interview in the above matter was held via Webex, commencing at 10:07 a.m.



1

2

Mr. [REDACTED]. This is the transcribed interview of Richard Walters

3

conducted by the House Select Committee to Investigate the January 6th Attack on the

4

United States Capitol pursuant to House Resolution 503.

5

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

6

name for the record.

7

Mr. Walters. Richard Walters, W-a-l-t-e-r-s.

8

Mr. [REDACTED]. Now, this will be a staff-led interview, although members

9

may choose to ask questions. I will note that currently we are not joined by any

10

members.

11

My name is [REDACTED], and I am an investigative counsel with the

12

select committee. With me from the select committee are [REDACTED], senior

13

investigative counsel; [REDACTED], an investigator. We also have joining

14

electronically [REDACTED] and [REDACTED], two other investigators.

15

At this time, I'd ask counsel to identify himself for the record.

16

Mr. Steggerda. My name is Todd Steggerda. I'm a partner at McGuireWoods in

17

Washington, representing Mr. Walters. I'm joined telephonically by my colleague and

18

associate at McGuireWoods, Emily Kelley.

19

Mr. [REDACTED]. Now, Mr. Walters --

20

Mr. Steggerda. [REDACTED]? One question.

21

Mr. [REDACTED]. Yes.

22

Mr. Steggerda. I see someone on the line named [REDACTED]. Is he a

23

stenographer, or is that a different --

24

Mr. [REDACTED]. No, he's not, but he's with the select committee staff.

25

He's a non-member with the select committee staff who is helping.

1 Mr. Steggerda. Okay.

2 Mr. [REDACTED]. Yeah.

3 Now, Mr. Walters, you are voluntarily here for this transcribed interview.

4 Ground rules for the interview.

5 There is an official reporter transcribing the record of this interview. The  
6 reporter's transcription is the official record of the proceeding.

7 This proceeding is also audio and video recorded, and we ask that neither you nor  
8 your counsel audio or video record this proceeding.

9 Now, please wait until each question is completed before you begin to respond,  
10 and we will do our best to wait until your response is complete before we ask the next  
11 question.

12 The reporter cannot note nonverbal responses, such as shaking or nodding your  
13 head. So it is important that you respond to each question with an audible, verbal  
14 response.

15 Please give complete answers to the best of your recollection. If a question is  
16 unclear, please ask for clarification. If you do not know the answer, please just say so.

17 I also remind you that this is a congressional proceeding and it is unlawful to  
18 deliberately provide false information to Congress. Doing so may result in criminal  
19 penalties.

20 Now, logistically, if at any time you want to take a break or discuss something with  
21 your lawyer, please let us know. We're happy to accommodate.

22 Before we get started, do you have any questions?

23 Mr. Walters. No.

24 Mr. [REDACTED]. Okay. Great.

25 I will note still that there are no members present. And to the extent that

1 anyone from the committee joins, I will do my best to let you know that happens.

2 EXAMINATION

3 BY MR. [REDACTED]

4 Q Now, Mr. Walters, before we get started, do you remember meeting with us  
5 for an informal interview some months back?

6 A I do.

7 Q All right. Now, today's interview will be pretty similar to that informal  
8 interview, and we'll go through some of the same topics.

9 Before we get started, what's your full name? Do you have a middle name?

10 A Yes. Richard William Walters.

11 Q Okay. And what's your date of birth?

12 A [REDACTED]

13 Q And where do you reside?

14 A Washington, D.C., currently.

15 Q What's your address?

16 A [REDACTED]

17 Q And what's your cell phone number?

18 A Area code [REDACTED]

19 I assume this information's not going to be shared outside of this?

20 Q No, it's -- it's not shared outside of this, no.

21 A Okay.

22 Q And what's your -- was that the cell phone number you had in November of  
23 2020 through January of '21?

24 A Yes.

25 Q And what is your -- do you have an Instagram or Twitter account?

1 A I do.

2 Q And what are their handles?

3 A I believe my Twitter handle is RWW\_GOP, and I do not know what my  
4 Instagram handle is. I very rarely use social media.

5 Q Were those accounts you had in that same time period of late 2020 to early  
6 '21?

7 A Yes.

8 Q And give us some background regarding your education.

9 A I have an undergraduate degree in public policy from University of  
10 Mississippi and attended Columbia University for a graduate degree in education policy  
11 and social analysis, though I did not complete it.

12 Q All right.

13 Let's go through your professional background. Let's start with your work with  
14 the RNC in 2014, and let's work our way forward. So what was your first role with the  
15 RNC?

16 A For clarity, I started at the RNC in 2013 as the deputy Midwest finance  
17 director. And that was for 2013 and 2014.

18 Q And what did you do in that role, very generally?

19 A Major donor fundraising.

20 Q And then tell us about your next role at the RNC.

21 A I was the Midwest and Northeast finance director.

22 Q And was that the same responsibilities, just for a different geographical  
23 area?

24 A No. The first responsibility, I was the deputy, so reporting to a director.  
25 The second I mentioned, I was director, so a little bit more responsibility, but the same

1 general work, I guess.

2 Q Okay. Yeah, okay, that makes sense.

3 Tell us about your next role.

4 A Finance director.

5 Q And what are the roles of finance director?

6 A In this capacity, I was responsible for writing a budget for major donor  
7 fundraising and overseeing a team to execute those goals and raise the money for the  
8 major donor side.

9 Q And what was your next role?

10 A Interim chief of staff.

11 Q And when did you take on that role?

12 A In August of 2017.

13 Q And what were your responsibilities -- was interim chief of staff the same  
14 responsibilities as you eventually undertook as chief of staff?

15 A More or less. Sure. Yeah.

16 Q Okay. And what were those?

17 A Just to clarify, the interim process was pretty much just to keep the  
18 day-to-day moving, right, as a search was happening for a new chief of staff. But,  
19 ultimately, yes, the responsibilities ended up being the same.

20 Q And what were those responsibilities as chief of staff?

21 A So I oversaw the mission and vision of the RNC, which was to create a  
22 permanent ground game throughout the country, the most robust data operation in party  
23 history, and to, like I said, create a field operation that helped Republicans win up and  
24 down the ballot.

25 Q Let's talk about -- and who did you report to as chief of staff?

1 A Chair of the party, Ronna McDaniel.

2 Q Was she the chair of the party for the duration of your tenure as chief of  
3 staff?

4 A She was.

5 Q And how often would you say in 2020 you were in contact with Ms.  
6 McDaniel?

7 A Daily or, at minimum, every other day, but likely daily, especially since we  
8 were in the middle of the pandemic and really trying to move into a virtual operation.

9 Q And in the reporting structure of the RNC, can you give us insight into, was  
10 she the only person you reported to? Was there anyone else above you that wasn't  
11 her?

12 A So, technically, the RNC is made up of 168 members, three from each U.S.  
13 State and territory. And those members are the governing body of the party, and those  
14 members select the chair of the party.

15 So, in some respect, I was responsible for reporting to them as well, but typically it  
16 was on a more general basis, unless members had specific questions about specific  
17 aspects of something we may have been working on, if that makes sense.

18 Q It does. Thank you for the explanation.

19 So, on a day-to-day basis, is it fair to say that you reported just to Chairman  
20 McDaniel?

21 A Yes.

22 Q And was anyone else her direct report, or did everyone feed through you?

23 A No, she had others who reported to her as well -- the COO, CFO, different  
24 department directors that she would call and talk with.

25 Q Can you give us a brief rundown of who those people are?

1           A    Sure.  So CFO, COO, political director, data director, finance director, digital  
2 director.  Really, if something -- communications director -- if she had a question on  
3 something, she would call either me or the director.

4           Q    Now, of the people you just mentioned, did any of them report to you?  I'm  
5 trying to get a sense of the structure, whether --

6           A    Yeah --

7           Q    Understanding that, on a day-to-day basis, the chairman can speak to  
8 whoever she chooses to speak to --

9           A    Right.

10          Q    -- but, at least on a formulaic sense, were -- like, for example, the digital  
11 director, the political director, were those folks, at least in a formal sense, reporting to  
12 you?

13          A    Yeah, so if you're looking at an org chart, she would be at the top, I would be  
14 under her, and then those director would be under me, reporting up.

15          Q    And who was the digital director in 2020?

16          A    Kevin Zambrano.

17          Q    And Mr. Zambrano stayed on through the election, into at least January  
18 2021, correct?

19          A    Correct.

20          Q    And who was the political director in 2020?

21          A    Chris Carr.

22          Q    And did he stay on through January '21?

23          A    He was on payroll, yes, but he wasn't really present.  But, yes, he was on  
24 payroll.

25          Q    When did he stop being present, as far as you can recall?

1 A From what I recall, like, after the election.

2 Q Now, you're currently a senior advisor to the chair; is that right?

3 A That's correct.

4 Q And when did you undertake that role?

5 A In February of 2022, this year.

6 Q And what are your responsibilities there?

7 A So I am focused on some of the long-term projects of the party, so the 2024  
8 Presidential nominating process, the national convention, primary and general debates,  
9 as well as offering guidance and assistance to the current team when needed.

10 Q Right.

11 So let's -- we're going to try to streamline this interview some, more so than our  
12 prior informal, so we're going to kind of get to it. Let's jump forward to leading into  
13 election day.

14 A Okay.

15 Q So, a week before election day in 2020, tell us a bit about what your week  
16 leading up to election day looks like. What are you doing, what are your responsibilities,  
17 directly before election day?

18 A So, from what I can recall, our focus at that time is paid voter contact. So a  
19 lot of political digital messaging, political digital text messaging, turning out voters and  
20 making sure that that's what's happening throughout the country in all of our target  
21 battleground districts and battleground States.

22 Q As I'm sure you're aware, Mr. Walters, leading into the 2020 election,  
23 President Trump discussed his expectation regarding possible fraud during the election.  
24 Do you recall those public statements by the former President?

25 A Vaguely, yes.

1 Q As RNC chief of staff, do you recall any preparation or otherwise efforts that  
2 the RNC had leading into the 2020 election regarding the potential for fraud?

3 A Yes.

4 Q Can you tell us about that?

5 A Yes. We were involved in litigation in States across the country. You  
6 know, we saw a multitude of Governors use COVID as a way to change election laws and  
7 change the way the process of voting had happened for decades in this country and really  
8 remove a lot of safeguards from voting and from ballots. And so we were involved in  
9 suing those States to help prevent any fraud from occurring.

10 Q And what was your role in those efforts, if any?

11 A Sure. So our legal counsel would bring the potential litigation, lawsuits, to  
12 me and discuss them, and he would seek approval as to whether or not we would move  
13 forward with litigation.

14 Q And who was that individual?

15 A Justin Riemer was our chief counsel then.

16 Q And was Mr. Riemer's -- did you rely on his legal advice?

17 A Yes.

18 Q And what's your view of Mr. Riemer? Do you hold him in high regard? Do  
19 you hold his advice in high regard?

20 A Yes to both.

21 Q And did, post-election, Mr. Riemer keep advising you on litigation efforts  
22 across the country?

23 A Yeah, more of updating what was going on. Post-election, he really was  
24 working with the campaign on a litigation effort and litigation strategy. And, really, how  
25 this worked was, he would call or we would meet, and he would say, "This is what

1 the -- you know, the issue is. I think we should engage/I think we shouldn't engage.  
2 What do you want to do?" He'd give a recommendation and then ask for how to  
3 proceed.

4 Q Is it fair to say that you thought that Mr. Riemer had a fulsome and deep  
5 understanding of the status of the post-election efforts from the campaign and from the  
6 RNC?

7 A I would say from the RNC. I guess I can't really speak to his understanding  
8 of what was going on at the campaign. But from the RNC standpoint, while he was, you  
9 know, our general counsel, chief counsel, my hope is he would have a full understanding  
10 of the litigation.

11 Q Was that your understanding -- so that was your hope. Was it your  
12 understanding? Is that what you believed?

13 A Yeah, that was my -- my understanding. Yeah.

14 Mr. Steggerda, [REDACTED], in what period are you referring to? Immediately after the  
15 election? Are you talking about December? Are you talking about January?

16 BY MR. [REDACTED]:

17 Q So our primary focus, Mr. Walters, is going to be from November 3rd  
18 through early January. You could even use January 6th as a bookend. So when I talk  
19 about "the relevant period," unless I say otherwise, I'm talking about November 3rd  
20 through January 6th.

21 A Yeah, I would say that Justin had an understanding at least through  
22 November.

23 Q And why do you say through November?

24 A Because he took a leave of absence sometime at the end of November and  
25 December, and our interim chief counsel, Matt Raymer, who's chief counsel now, took

1 over the litigation efforts.

2 Q So, at least before late November, he was -- everything you said was  
3 applicable then, that you relied on him and he was, kind of, updating you?

4 A Correct.

5 Q What about Jenna Kirsch? Is that someone that you interacted with?

6 A Not really. She was -- I know she was in the legal department. I'm sure  
7 there are occasions where I interacted with her. But, day to day, or even week to week,  
8 I would say no. We didn't interact often.

9 Q And did Ms. Kirsch -- did she report to Mr. Riemer in November 2020?

10 A I would say ultimately she did, but I don't know the reporting structure  
11 within the department, if she had other supervisors she went through first before him.

12 Q And did you, in this time period, interface directly with outside counsel as it  
13 related to election fraud issues?

14 A Not that I recall.

15 Q Any other lawyers that we haven't talked about that in the post-election  
16 period you would've been relying on for your understanding as to the state of the  
17 post-election efforts going on across the country?

18 A I know -- probably Justin Clark. I wouldn't say I relied on him, but I do  
19 recall, you know, he worked with Justin Riemer on some of the, you know, ongoing  
20 litigation issues. But ultimately I relied on Justin and then Matt.

21 Q Did you have direct conversations with Justin Clark, or were you getting info  
22 from him through Justin Riemer?

23 A So, with regard to litigation, I got my information through Justin Riemer. I  
24 did have conversations with Justin Clark about other items, because he served as the  
25 deputy campaign manager. So there were other logistical, you know, things we would

1 discuss every now and then.

2 Q So your conversations with him, is it fair to say they were political in nature,  
3 regarding his deputy --

4 A Yes.

5 Q -- campaign manager role?

6 A Right.

7 Q Okay.

8 Now, let's switch gears a bit and talk about Kevin Zambrano. Did Kevin  
9 Zambrano report -- he reported to you directly. Is that fair?

10 A Yes, that's fair.

11 Q And tell us a bit about what role or responsibility you had in overseeing Mr.  
12 Zambrano's work and what you understood that work to be.

13 A So my understanding of his work was to be responsible for online digital  
14 fundraising and what we call political digital.

15 And as far as overseeing his work, I didn't really oversee, you know, his work day  
16 to day. As long as online fundraising was, you know, going on and political text  
17 messages or political ads or whatever were going up, I didn't interface much beyond that.

18 My approach to Kevin, as it was to all of the directors, was to allow them to run  
19 their own teams, and when there was a problem, I would intervene.

20 Q In the November to January period, do you recall ever intervening at all with  
21 Kevin Zambrano's work?

22 A Not that I recall.

23 Q Now, are you familiar with an individual named Gary Coby?

24 A Yes.

25 Q And who is Gary Coby?

1 A He is a consultant to the RNC.

2 Q Was he also the digital director for the Trump digital team that included  
3 TMAGAC?

4 A I don't know if that was his title. I know he was in a consulting role. I  
5 don't know if he was the digital director for them.

6 Q Do you know how Mr. Zambrano worked with Mr. Coby? Do you know,  
7 like, how they interacted?

8 A I know that they worked together on creating, you know, like, a budget for  
9 what they thought they could raise year-in and year-out. But outside of that, you'd have  
10 to ask them.

11 Q What do you understand TMAGAC to be?

12 And for the reporters, T-M-A-G-A-C.

13 A It was the joint fundraising committee between -- well, again, I guess in just  
14 the post-election time?

15 Q Post-election time. Well, let's do this --

16 A Yeah.

17 Q Is it fair to say, prior to the election, TMAGAC was a joint fundraising  
18 committee between the RNC and the Trump campaign?

19 A Yes.

20 Q And it focused primarily on small-dollar donors who donated through either  
21 email or text message?

22 A Yes. And there may have been a direct-mail component to that as well.

23 Q But it focused on small-dollar donors electronically. Is that --

24 A Yes.

25 Q -- what TMAGAC is?

1 A Small-dollar donors, yes.

2 Q Yeah.

3 And around November 9th, on or about, Save America PAC, the President's  
4 leadership PAC, was added to the joint fundraising agreement, as well, that TMAGAC was  
5 governed by. Is that accurate?

6 A I know it was added. I don't recall the date.

7 Q Okay.

8 Now, I want to get a sense of your understanding as to how TMAGAC operated.

9 So --

10 A Okay.

11 Q -- do you have an understanding as to how the -- and here's what I  
12 understand from our investigation, and you tell me whether this comports with what you  
13 know or whether you have no idea what I'm talking about.

14 So we understand it that RNC copywriters, folks who were RNC employees,  
15 worked under Austin Boedigheimer, who was a deputy digital director at the RNC, who  
16 reported to Kevin Zambrano and also to Mr. Coby. And those copywriters drafted copy  
17 as part of their job. That copy was then approved by individuals from both the RNC and  
18 the Trump campaign. And then that copy was then sent out to the public.

19 That money comes back into TMAGAC as a joint fundraising committee. And  
20 then that money is, after expenses are paid, disbursed to the RNC and the Trump  
21 campaign as pursuant to whatever agreement is operative at that time for how to split  
22 those proceeds.

23 Is that all fair and accurate?

24 A I would not say that's all accurate, no.

25 Q So tell me about it in your words.

1           A     So the RNC staff that you referenced would create copy for RNC text  
2 messages, RNC-only, RNC-specific text messages and emails, as well as TMAGAC text  
3 messages and emails. But the Trump campaign staff also had individuals creating, from  
4 my understanding, content for TMAGAC as well.

5           I also wouldn't say that those staff were responsible for reporting to Gary Coby.  
6 You know, if -- that's not something I would have approved. I don't have RNC staff  
7 report to outside consultants. Just in general practice -- it doesn't matter to me, you  
8 know, if it's digital, political; I don't care -- staff reports to staff and not to outside  
9 consultants.

10          Q     Now, both public reporting and numerous individuals we've spoken to do  
11 not label Mr. Coby as a consultant the way you do. They label him as the digital director  
12 of the Trump digital machine.

13          So are you saying that your view of his role -- understanding he has his own  
14 companies that interface with the RNC and with the campaign, public reporting and  
15 multiple individuals we spoke to said he was the digital director, end of the day, Gary  
16 Coby was the boss of the 2020 Presidential cycle digital team that the RNC and the  
17 campaign relied on for the purposes of the Presidential election.

18          Is it your view that that's incorrect?

19          A     It's my view that I would -- Gary very well may have done that on behalf of  
20 the Trump campaign, and he was definitely involved with the RNC aspect as well, like I  
21 said, as a consultant, but he was not in charge of my staff.

22          I would not -- and, look, that's as far as I know, right? If Kevin and him worked  
23 something else out that I am unaware of, I guess that's a different story. But I would not  
24 have had staff report to an outside consultant.

25                   BY MS. [REDACTED]:

1 Q So maybe it would help to say, when you're saying "report," there's kind of  
2 like the manager role, right? Somebody who approves time cards, approves vacations.  
3 It's our understanding that that would've been Mr. Zambrano, right? Because he was, in  
4 fact, who they reported to at their place of employment as RNC employees. Fair?

5 A Fair.

6 Q But for the purposes of content or for the purposes of, kind of, substantively  
7 what they were doing, in terms of the work product that they were producing, our  
8 understanding was that that was largely approved, reviewed, and driven by Mr. Coby, not  
9 by Mr. Zambrano.

10 A If that's what they worked out, that is not -- that is news to me. I guess --

11 Q Okay. So --

12 A Again, I know that Gary was involved in it, but as far as who drove it on  
13 behalf of the RNC, I would've expected Kevin, the digital director, to take the lead on that.

14 And if he worked with Gary, that's great. I agree that probably did happen, that  
15 he worked with him, because he was a consultant to us. But --

16 Q So I just want to be --

17 A -- as far as, like, the master of strategy, I would -- if -- go ahead. I'm sorry.

18 Q No, no. I just want to be clear, was it your understanding from  
19 Mr. Zambrano that he was supervising them when it came to, like, the content of their  
20 work and what they were doing?

21 A Look, I don't recall a specific conversation where Kevin said that "I am  
22 supervising them and their work and what they're doing." But, you know, do I expect  
23 my comms director to supervise, you know, her staff, or my finance director to supervise  
24 her staff, or whatever? Yes. That's my understanding in general when it comes to  
25 directors and their teams, that they're supervising them, and not an outside consultant.

1 Q Okay. That's helpful clarification-wise. Thank you.

2 BY MR. [REDACTED]:

3 Q And are you familiar with who Austin Boedigheimer is, the deputy digital  
4 director?

5 A Yes.

6 Q And what did you understand his role to be? We've been told he oversaw  
7 the email and text fundraising team. Is that what you understood him to do?

8 A I -- I don't know. Again, my management approach, very much so, was to  
9 hire competent directors to assemble teams to get the job done. And if that is what  
10 Kevin hired Austin to do and that's what they agreed to do, then great, but I can't say for  
11 certainty that I understood that's what his exact role was.

12 Q So is it fair to say that, when it came to the digital efforts, that you just were  
13 not involved? Is that a characterization that is accurate? Or how would you frame it?

14 A Well, I think there are multiple aspects of the digital effort. If we're talking  
15 about, you know, a digital spend on prospecting, if we're talking about political ads  
16 targeting, you know, a Democrat or supporting a Republican, you know, very broadly I  
17 would've been involved in those discussions. But, like, the minutia of content and, you  
18 know, day-to-day reporting, no, I would not have been involved in that.

19 Q Well, I guess when you say "the minutia of content" -- as we understand it, in  
20 2020, digital fundraising was absolutely critical and fundamental to the fundraising efforts  
21 of both the RNC and the Trump campaign. Is that fair?

22 A I would say it was absolutely critical to the Trump campaign. The RNC  
23 fundraising, it was critical to us as well, but we had our own separate operation that I  
24 relied on more so than TMAGAC.

25 Q And what was that operation?

1           A     RNC digital fundraising, like, RNC only, RNC specific, outside of TMAGAC, that  
2 had to do with the campaign.

3           Q     And who was head of that enterprise?

4           A     That also fell under Kevin.

5           Q     And do you know who worked on that, which copywriters, who drafted  
6 copy --

7           A     Yeah, I couldn't --

8           Q     -- on that critical part of the RNC?

9           A     I couldn't tell you the names of the copywriters who worked on that or,  
10 quite frankly, really, any staff below the deputy level in any department.

11          Q     All right. So who was the deputy working on that side?

12          A     So Austin was the deputy digital director. And, again, if Kevin and Austin  
13 came up with a team to focus just on RNC fundraising -- which they did, because we had  
14 RNC-specific-only fundraising -- you know, you would have to ask them as to who they  
15 assigned to that.

16          Q     Okay. So is it fair to say that what happened below Austin you don't have  
17 any direct knowledge of?

18          A     Yeah. I mean, I may have some peripheral knowledge of, you know, like I  
19 said, if we're -- if they are creating targeted political ads in a State, you know, sure, I  
20 would know that that's happening. But that doesn't necessarily mean I know the  
21 content of those ads.

22          Q     Well, I'm asking you something just a little bit more broadly, is that --

23          A     Okay.

24          Q     -- TMAGAC raises hundreds upon hundreds of millions of dollars for the RNC  
25 and the Trump campaign. And that's even pre-election, obviously. And then,

1 post-election, TMAGAC raises several hundreds of millions more, post-election.

2 And what I'm trying to get a sense of is: That enterprise that -- from all accounts  
3 that we've heard from people who worked at the campaign, who worked at the RNC, and  
4 from third parties, they saw the TMAGAC effort as incredibly successful both pre-election  
5 and post-election and as a part of the enterprise that really pulled its own weight and  
6 worked out well.

7 So I'm trying to get a sense: That TMAGAC enterprise, is that fair -- would you  
8 say that you were not involved with that?

9 I'm trying to get a sense -- because what I don't want to do, Mr. Walters, is spend  
10 a morning asking you questions of things where this is just -- someone else, you know,  
11 either got it right or got it wrong but it wasn't you.

12 So tell us a bit -- with TMAGAC, is that outside of your wheelhouse?

13 A Yeah. I mean, for a large part, it is, you know?

14 Just to give an example, in 2019 -- I don't remember our exact raise in 2019 in  
15 TMAGAC, but, you know, let's say it was \$100 million gross. The RNC portion of that  
16 would've been \$25 million before expenses. After expenses, you know, the net would  
17 probably be somewhere between \$12 million and \$15 million. And when our raise that  
18 year is \$200-or-so million, that's a very small portion of what my revenue stream is.

19 Q Yeah. Okay. Well, we're going to come to some of that, Mr. Walters --

20 A Okay.

21 Q -- and kind of talk about what role TMAGAC played.

22 But as far as the process by which content was either decided or created, did  
23 you ever -- were you involved in that process or knew how it worked?

24 So, if I'm looking at emails, and, you know, there are hundreds of emails that go  
25 out post-election, do you have any involvement or awareness as to what's going on,

1 either on the back end where you are helping with the process or, I guess, at the front  
2 end -- or at the back end where you're getting the emails? Are you aware of that at all?

3 A Yeah, so I -- I was not involved in the process unless I was asked to be  
4 involved, if there was a dispute or something between department directors.

5 So, you know, there was an approval process, approval chain, that different  
6 individuals gave sign-off on for content. I was, you know, on that chain. But I don't  
7 recall ever -- you know, I never engaged with it unless I was asked. I just -- there was so  
8 much other stuff going on that was a lot more pressing and important.

9 Q Now, when you say you were on the chain, you're talking about -- that's the  
10 chain I referenced where, after copy is drafted, it's submitted to the approval chain for  
11 both the campaign and the RNC to be reviewed and approved before it's published. Is  
12 that what you're discussing?

13 A Correct.

14 Q And you're saying --

15 Mr. Steggerda. Well -- and, [REDACTED] just to clear the record --

16 Mr. [REDACTED]. Okay.

17 Mr. Steggerda. Can we just be clear in terms of, when you say "approval chain,"  
18 do you mean your name's on an email with tons of other people --

19 Mr. Walters. Right.

20 Mr. Steggerda. -- or is it actually the specific smaller group that actually signed  
21 off?

22 Mr. Walters. I don't --

23 Mr. Steggerda. [REDACTED] heard from a lot of different witnesses --

24 Mr. Walters. Sure.

25 Mr. Steggerda. -- how it works, so I don't want to confuse the two things.

1           Mr. Walters. Yeah. So it's a listserve. I don't know the exact number of  
2 people on it. I would probably say at least 20, but very well could've been more than  
3 that, between the two entities.

4           And, again, it was more of an FYI on my end unless I was asked to engage. But,  
5 you know, I don't even recall reading the emails when they came through.

6                           BY MR. [REDACTED]:

7           Q    Now, let's go back to -- so, leading to election day, there is the  
8 litigation -- various litigation efforts that you were referencing.

9           And, Mr. Walters, what I'm going to try to parse out today is drawing the  
10 distinction between fraud and the processes that are in place in States to prevent fraud,  
11 versus evidence of actual fraud. And I want to get your understanding of those two  
12 distinct ideas. Is that fair?

13          A    Sure.

14          Q    All right.

15          So, going into election day, did you have discussions regarding the expectation  
16 that there would be fraud that could be dispositive leading into election day? Did you  
17 have any discussions with anyone about -- and I'm not asking you to tell me something  
18 your counsel told you, if that's the case. But tell me more, if you had any discussions  
19 regarding that.

20          A    I mean, yes, but it would go into -- involve conversations with counsel.

21          Q    Okay. So let me ask you a different question. On election day, did you  
22 have an expectation that there would be an effort by the Democratic Party to engage in  
23 coordinated fraud?

24          A    Again, I think this goes to -- depends on how you define it. I think my view  
25 is, you had Democrats change laws all throughout the country that created mass

1 confusion that opened the door for fraud.

2 I mean, we've seen video of, you know, multiple ballots being deposited in  
3 dropboxes in Georgia where ballot harvesting's illegal. Now, I'm not saying that those  
4 ballots were cast for a Republican or Democrat, but the fact of the matter is, it's illegal.

5 Q All right, so I'm going to stop you.

6 But what I'm asking you, again -- I'm not asking you about process. I'm asking  
7 you whether the Democratic Party, as a political party, was going to be engaged in  
8 coordinated fraud, not changing the laws to permit mail-in ballots, because I think, if you  
9 agree with my framing, that may be a question about legitimate process and what's  
10 legitimate or not, versus actual fraud, which I'm going to define as someone either  
11 illegally voting or otherwise trying subvert the will of the people, right?

12 So did you have an expectation that Democrats -- on election day, have the  
13 expectation that Democrats would engage in coordinated fraud?

14 A Am I aware of a Democrat saying out loud on national television that they  
15 were going to commit fraud on election day? No.

16 Do I believe that Democrats used COVID -- and I understand you want to separate  
17 them, but I really don't think you can. Do I think that they used the process to allow for  
18 an environment for fraud to happen? Absolutely.

19 BY MS. [REDACTED]:

20 Q I just want to follow up on that for a moment.

21 A Sure.

22 Q Sitting here today, it is your belief that the Democratic Party would  
23 encourage and endorse voter fraud, would be fine with dead people voting, would be fine  
24 with illegal voting procedures? It's your position that the Democratic Party was  
25 encouraging or creating the circumstances to encourage actual illegal voter fraud?

1           A    It's my position that they created an environment that allowed it.

2           Q    No, no, that's not what I'm --

3           A    Hold on.  Let me -- "encourage" is your word, not mine.  So they created  
4 an environment that allowed it.  I didn't say they encouraged it.  They created an  
5 environment that allowed it.

6           And, as far as today goes, I would say you still see it.  You see it in Georgia, where  
7 you have Democrats screaming at the top of their lungs that an election integrity bill  
8 creates voter suppression, when, actually -- the results are in from last night -- you had  
9 more minorities voting in the State of Georgia than ever before.

10          Q    Wait, wait, wait.  I understand --

11          A    I do --

12          Q    I understand -- Mr. Walters, I don't want to interrupt you.

13                The stock market is an environment that creates an opportunity for fraud.  
14 Financial planners is a career that creates an opportunity for fraud.  The difference here  
15 is intent.

16                Is it your position that the Democratic Party intended to increase voter fraud in  
17 the changes that they made to the voting laws, that they intended voter fraud?

18          A    Again, you're continuing to use words that I did not use.  So my position is,  
19 the Democratic Party created an environment where fraud could exist.  Whether they  
20 intended it -- which, again, is your word, not mine -- I don't know.  But what we do know  
21 is that an environment was ripe for it.

22          Q    I guess what I'm asking is:  Voter fraud existed -- when you created voting,  
23 you created the environment that could lead to voter fraud, correct?

24          A    Correct.  And when you remove voting safeguards, you make it even more  
25 so where the environment is ripe for voter fraud, which is what we saw.

1 Q And did you think that, in the removal of these safeguards, the intent of the  
2 Democratic Party was to enable fraud?

3 A I do believe that, in mailing out multiple ballots to people, people receiving  
4 multiple ballots to individuals, for States not purging voter roles, not purging voter lists,  
5 and people receiving ballots where they haven't lived in decades, created an environment  
6 for fraud. Yes, I do believe that.

7 And I understand your question on intent. Did a Democrat say out loud that this  
8 is my intent? No, not that I know of. I don't know that to be the case. But I don't  
9 think that they had to.

10 BY MR. [REDACTED]:

11 Q Well, here's the problem I have -- and, Mr. Walters, we are honestly trying to  
12 make this an expedited process today, so we're going to try to cut to the chase.

13 A Sure.

14 Q We're going to draw big distinctions here, because what we want to  
15 understand is what the RNC's positions were and what the RNC's knowledge was at the  
16 time. Right? And we're going to understand that through you.

17 We can go State by State if that's easier for you, and you can explain to us, State  
18 by State, each battleground State, what your belief was as to -- because right now we're  
19 making very general claims about someone getting mail from decades ago, and that is  
20 what I do not want to do. I want you to be as precise as possible.

21 If you have beliefs that are based on specific States, specific legal changes, that  
22 you think are evidence of fraud or evidence of Democrats engaging in fraud, we want to  
23 know that.

24 But what we see is that RNC individuals, multiple, again and again draft  
25 fundraising emails that go to millions of people that are not nuanced, that say that

1 Democrats are trying to steal this election.

2 And you, as the deputy to the chairman, I want to understand what you -- your  
3 understanding as to whether those statements were true and, if they were true, what  
4 you're basing it on.

5 A So, since you asked for an example, I'm happy to give you one.

6 In the State of Michigan, there was an election worker who said publicly that she  
7 was intimidated by her Democrat boss into counting ballots after they were received  
8 after election day. A whistleblower report was filed in, I believe it was the Eastern  
9 District, in court in Michigan because of that exact thing happening.

10 So, again, you're asking, is that fraud? Well, our position is that if you're  
11 counting ballots in after election day, that, yes, that is fraud. And so you asked for an  
12 example; there is an example.

13 Q Okay. And if you have more precise -- because we can -- we can get it on  
14 the break, because I would love to talk about an example with you. Because what we've  
15 seen --

16 Mr. Steggerda. But, [REDACTED].

17 Mr. [REDACTED]. Yeah.

18 Mr. Steggerda. -- [REDACTED]. I mean, he's not here, you know, to lay out the  
19 entire legal case across 50 States about the instances of fraud.

20 He's told you three times already how he viewed it, that his concerns he  
21 had -- that stemmed and is reflected by months of RNC litigation about the procedures.  
22 He described for you how he was concerned about safeguards. He laid out some  
23 instances he's aware of that were actual fraud and he thinks that the system allowed for  
24 given the change of the rules. He's said he can't, you know, allege what the Democratic  
25 intent was.

1 But I would ask that we bring it back to his role in the approval process.

2 Mr. [REDACTED]. Well --

3 Mr. Steggerda. I think he's explained pretty adequately what --

4 Mr. [REDACTED]. And, Todd, that's exactly what I'm going to do.

5 Mr. Steggerda. But I want -- he's explained to you how he viewed the process.

6 And, now, if we can go back to his relatively minor role in actually approving these

7 things --

8 Ms. [REDACTED]. Well, just --

9 Mr. Steggerda. -- which I think is the -- which is the relevant part of the  
10 interview.

11 Ms. [REDACTED]. It is, Todd, but I will say this.

12 And, Mr. Walters, you correct me if I'm wrong.

13 There have been individuals we spoke to who said, "I may have drafted the copy  
14 that said 'the liberal mob was trying to steal the election,' but I took that from the  
15 candidate. I might not have shared those personal beliefs."

16 A moment ago, it actually sounds like you would not disagree with the statement  
17 that "the liberal mob was trying to steal the election."

18 And let me be clear, it is not our place to judge your views. What we are trying  
19 to get is, if you believed that that statement was true, it would impact your view of those  
20 emails, the way that somebody who thought it was false, it would impact their reaction to  
21 the emails.

22 So, if I showed you an email that said "the liberal mob is trying to steal this  
23 Presidential election" -- correct me if I'm wrong -- I got the impression would you not  
24 disagree with that. And that's fine. We were trying to get your position as to whether  
25 a statement like that, to you, seemed true.

1           Mr. Walters. Okay. Well, I will respond and correct you, because you are  
2 wrong. Not once did I say that, and I apologize if that was your interpretation.

3           What I said was, Democrats used COVID as a way to change election laws  
4 throughout the country, which created confusion and allowed for an atmosphere that  
5 could have led to fraud.

6           I did not refer to a mob, did not say the mob was stealing an election. Those  
7 words never came out of my mouth, number one.

8           Number two, it's hard to say that I would be okay with the emails because, as I've  
9 already previously stated, I very rarely read them, if at all. I don't recall ever reading  
10 them unless I was asked to engage.

11                           BY MR. [REDACTED]:

12           Q    So let me ask you this. The approvals team. Who did you understand to  
13 be on the approvals chain from the RNC and what role they served?

14           A    So, I don't know everyone who was on the chain. There were multiple  
15 folks. But --

16           Q    Let's start with the people that are actually, like, critical, the people who you  
17 think were actively engaged and matter in the chain. Who were those people?

18           A    There's someone from the counsel's office, someone from the  
19 communications team, and someone from the research team.

20           Q    And you said -- so legal, comms, and research.

21           A    Yes.

22           Q    Okay. So who were those people by name, post-election period?

23           A    Again, I can't speak to exactly who. I know Justin Riemer could have been  
24 involved, but, again, he had other attorneys in his office he could've asked to do it.

25           Michael Ahrens or Michael Reed, they were the comms directors. They could've

1 approved it or could've had someone else in their office do it.

2 As far as the research team goes, the research director, he could've done it or  
3 could've had someone on his team do it.

4 So I don't want to assign a name to it, because I don't know for sure.

5 Q And what did you understand legal's job to be in reviewing fundraising  
6 emails?

7 A That if an email was going out about a court case or where we were  
8 intervening somewhere, that it was -- that the text was correct.

9 Q What if the text had said something that was legally problematic? Would it  
10 be legal's job to catch that?

11 A Yeah, I mean, I would expect the counsel's office to decide if something was  
12 legally problematic that couldn't go out, or that shouldn't go out.

13 Q All right. So is it fair to say the two things we've covered are, one, they  
14 would catch things that were legally problematic, that was for some reason not  
15 permissible to say or, you know, they advised against saying or, two, correcting that any  
16 representations made regarding ongoing litigation was accurate? Is that --

17 A Correct.

18 Q Anything in addition to those two things that you understood them to be  
19 doing?

20 A Not that I recall.

21 Q What about comms? What was their role?

22 A That the content going out was, you know, correct in message, right? It  
23 was on message with what was in the news that day, what was going on that day,  
24 relevant to the, you know, to the conversation, I guess.

25 Q Okay.

1 And then what was research's role?

2 A So, if an email contained, you know, like, facts and figures, right, like, that  
3 they were correct. Like, if the email said that, you know, we received X amount of votes  
4 in a State, that that number was correct, or that election day is on Tuesday, you know,  
5 November 3rd, that that's correct.

6 Q Okay. Thank you for that.

7 So let's go to election day. Where did you watch the results?

8 A The Four Seasons.

9 Q And who were you with?

10 A The RNC team, senior staff, which included their directors and deputies, and  
11 then some folks from the data team.

12 Q And were you there through the evening?

13 A I was.

14 Q And through early morning?

15 A Yeah. I think I left at, like, 11:00 a.m. or something like that.

16 Q Okay.

17 Now, on the day of election day, did you have any conversations -- or leading up  
18 to election day -- any conversations about preparing -- the preparing of copy to be  
19 sent -- to be approved for the post-election period, fundraising copy for email or text?

20 A No, not that I recall.

21 Q Do you recall being on any approval chains that went out about approving  
22 copy leading up to post-election publishing?

23 A I don't recall being on any approval chains.

24 Mr. Steggerda. Are you talking about TMAGAC --

25 Mr. [REDACTED]. Yeah.

1 Mr. Steggerda. -- emails, [REDACTED]?

2 Mr. [REDACTED]. Yeah, I am.

3 Mr. Walters. Yeah, I don't recall being on -- again, that doesn't mean that I  
4 wasn't. That doesn't mean that an email wasn't sent. But, again, like, I didn't really  
5 engage unless I was asked. So I don't recall being on an email chain, but, you know --

6 BY MR. [REDACTED]:

7 Q Did you have any discussions leading into election day about TMAGAC  
8 continuing fundraising after election day?

9 A With regard to what, specifically?

10 Q TMAGAC, in fact, does continue, obviously, to fundraise after election day.  
11 And our --

12 A Right.

13 Q -- understanding is that that kind of decision would've required approval or a  
14 directive from someone senior. People we've spoken to who are not senior say that  
15 they didn't make the decision to continue fundraising, someone senior had to make that  
16 decision.

17 So are you aware of any such decisions coming from the RNC? And were you  
18 involved with it, if so?

19 A I'm not aware of a decision. And, to be honest with you, that's not how I  
20 would view that, generally. So --

21 Ms. [REDACTED]. What do you mean?

22 Mr. Walters. So digital fundraising in the way I viewed it is, if, you know, we  
23 won, there would be fundraising on winning; if there was a recount, there would be  
24 fundraising on a recount. I mean, it's hard to plan, in my view, pre-election-day, before  
25 you know what's happening, what the content would be.

1           Mr. ██████████. So, if we told you that we have received evidence that the  
2 TMAGAC team did plan for what the content would be, would that be surprising to you?

3           Mr. Walters. It would be.

4           Mr. Steggerda. Do you remember if you've had any role in any TMAGAC  
5 preplanning about what the message would be post-election?

6           Mr. Walters. I don't -- no, I don't recall that.

7           Ms. ██████████. Do you have any idea, sitting here today -- I understand you said  
8 earlier you had a higher-level position in terms of not necessarily supervising the  
9 day-to-day work of Zambrano or his direct reports.

10           But, sitting here today, do you have any concept of the themes or messages of the  
11 fundraising that took place just before the election, leading up to January 6th?

12           Mr. Walters. Just before the election or leading -- are those two separate  
13 questions or all -- I'm sorry. Do you mind clarifying?

14           Mr. Steggerda. Well, let me --

15           Ms. ██████████. Just, are you aware --

16           Mr. Steggerda. I can try --

17           Ms. ██████████. No, it's okay, Todd.

18           Mr. Steggerda. Go ahead.

19           BY MS. ██████████:

20           Q    Are you aware of any of the themes or messages that were being used in the  
21 fundraising emails coming from TMAGAC just before the election and through up and  
22 until January 6th?

23           A    I mean, I would imagine that the theme or message before election day was,  
24 you have to get out and vote.

25           And then, post-election, I know we had recounts going on. We had Georgia,

1 where we had a runoff for two Senate seats that we were trying to mobilize staff to go  
2 down there for, which was a large focus for me at the time, and we were fundraising for  
3 that.

4 I mean, I guess, if that answers your question, that's, like, my general awareness.

5 Q Well, it does to a certain extent, in that I don't believe I remember seeing a  
6 fundraising email that actually encouraged people to go out and vote as opposed to  
7 donate. So maybe I'm conflating those in a way. But it sounded like you were saying  
8 you thought fundraising emails would encourage people to go out and vote. I definitely  
9 remember seeing, obviously, the election being important.

10 But let me make this even easier. Post-election, after voting was no longer an  
11 option, do you know what the large, common themes of the fundraising emails were  
12 between the election and January 6th?

13 A Yeah. Well, so just to address the first part, I guess I give our donors  
14 enough credit to know that, if we're saying the election is important, that they should go  
15 out and vote.

16 But with regard to post-election, I don't -- like I said, we were fundraising for  
17 Georgia, for sure, and the runoffs. We had two Senate runoffs there on January 5th,  
18 and so we were very much still focused on that. We had recounts going on in different  
19 States throughout the country. So I imagine that the content was, you know, around  
20 that as well.

21 Q I do remember emails that were raising funds for Georgia. I believe 60 or  
22 70 percent of that went to Save America, the President's PAC. Were you aware of that?

23 A I don't recall what the breakdown was.

24 Q Were you aware that little to no money that was raised to help Georgia from  
25 those emails from the President's PAC actually went to any representative running in

1 Georgia?

2 A Well, I can't speak to how the President's team spent their money, but I can  
3 say, as far as the RNC goes, we spent a significant amount of money, multimillion dollars,  
4 in Georgia.

5 BY MR. [REDACTED]:

6 Q One thing I want to just -- I want to bring it back, Mr. Walters. When you  
7 say you "would imagine" with the content, sitting here today, are you aware of what the  
8 TMAGAC emails focused on from election day forward?

1

2 [11:05 a.m.]

3 Mr. Walters. I am aware to -- at the time -- or -- I am aware to the extent of  
4 what has been, you know, reported out.

5 Is that -- I don't know if that's --

6 Mr. Steggerda. That's spam.

7 Mr. Walters. Okay.

8 Mr. Steggerda. He's trying to place -- like, if you've seen some of the press or  
9 seen some of these emails recently --

10 Mr. Walters. Right.

11 Mr. Steggerda. -- he's trying to distinguish, and I think Amanda was trying to do  
12 the same thing. Back at the time, what awareness did you have of the -- the messaging  
13 that was going out from TMAGAC, you know, generally, specifically?

14 Mr. Walters. Right. So, look, like I said, at the time, my understanding was the  
15 general awareness was regarding Georgia recounts, votes still being counted, you know,  
16 ongoing litigation. As we sit here today, to the point Todd just made, like, was -- have I  
17 seen press reports about, you know, different things that have come out. Have -- you  
18 know, different things that the committee has put out, I have. But, again --

19 Mr. [REDACTED]. What's your understanding now from those reports?

20 Does that change your understanding of what the emails were about?

21 Mr. Walters. A little bit. You know, the -- some of the emails were  
22 about -- about continuing to -- to make sure every vote's counted and to continue our  
23 litigation efforts and, you know, continue moving forward.

24 Mr. [REDACTED]. Mr. Walters, respectfully, that's wrong. And I need to  
25 understand that you don't have an understanding or you do, because what you're saying

1 is incorrect. The emails widely reported, and anyone reading the emails can see, they  
2 are heavily focused on claims of election fraud, right. We have messages from RNC  
3 individuals who indicate on the day of the election that they have preapproved emails  
4 regarding trying to steal the election. So I think your framing is just factually incorrect.  
5 So I am going to push back on that.

6 And what I want to understand from you, Mr. Walters, is that, were you aware at  
7 the time that TMAGAC was focused on sending emails indicating that election theft was  
8 going on at the hands of Democrats? Is that something you were aware of in November  
9 2020 or you were not aware of that?

10 Mr. Walters. So I'm going to push back on you. I completely disagree with your  
11 framing and how you just laid that out. And that I believe, like I said, the messages were  
12 about ongoing, you know, litigation and about continuing to fight for every -- every ballot  
13 being counted, continuing to -- to move forward to fight against fraud. I mean, those  
14 are very much so from what I understand and what I've read --

15 BY MS. [REDACTED]:

16 Q Mr. Walters, let me ask you something.

17 A Sure.

18 Q Have you sat and read the emails?

19 A Not -- not really, no. I've -- I've seen a couple, but I have not -- I mean, have  
20 I sat and read 600 emails? No.

21 Q No, no. But here's the thing, we have.

22 A Okay.

23 Q So this is why I am -- we are not sitting here expecting you to have read 600  
24 emails, especially when you said that you supervised somebody whose job that  
25 presumably was. My colleague is sitting here telling you, factually, we've read those

1 emails; factually, we've done analysis on these emails; factually, we've read reports that  
2 others have done on the analysis of those emails. There are things that are facts. If  
3 you don't know that, that's fine.

4 But when we tell you the facts of what is in those emails, because they were in  
5 fact sent and they are capable of being read and analyzed, and you push back and say, no,  
6 you are wrong, and then I ask you, have you read and analyzed the emails, and your  
7 answer is no, do you see where that is disconcerting from an inconsistent definition of the  
8 use of facts?

9 A I said I have not read 600 emails is what I said. I said I have read some of  
10 them. And I will go back to what I've been saying all along. I do believe that there was  
11 abuse of Democrat power throughout the country to change election laws, which created  
12 confusion among voters, throughout the country hands down, which created an  
13 environment for fraud.

14 And I do believe that the emails that were sent out fundraising for Georgia -- you  
15 yourself just admitted that those emails do exist -- fundraising for Georgia, talking about  
16 ongoing litigation that we have. I know I have seen emails stating the ongoing litigation  
17 we have. So I feel like, while we're sitting here and you're telling me those emails don't  
18 exist, it's a little bit of gaslighting because I know I have seen them.

19 Q Mr. Walters, I'm going to actually read you the email that I'm talking about  
20 for a moment, because --

21 A That's great. If you have a specific email you're referencing, that's one  
22 thing. But there are 600 or so plus emails. So if you want me to sit here and stipulate  
23 that none of the emails say what I have said, I'm not going to do that, because I disagree.

24 Q No, no. I totally understand. What I'm saying is the email that I told you  
25 about was an email that was purportedly from Eric Trump -- a surrogate -- and it was sent

1 on December 12th, 2020.

2 A Okay.

3 Q And it talked about the election in Georgia. It stated in the same email,  
4 Make no mistake, the leftwing mob is already trying to, underline, steal the Presidency,  
5 and now they're trying to attempt to, underline, steal the Senate too.

6 So I'm not disputing your characterization that there may have been other things,  
7 because it would be boring to just say they're stealing the election, election fraud for  
8 perhaps 600 emails in the time post-election leading up to January 6th. Did they  
9 sprinkle other things in? Was there a hat given away in the course of election fraud  
10 messaging? Probably. I'm not going to disagree with you about that.

11 But the point my colleague was trying to make that we were surprised you're  
12 pushing back on is that data and evidence shows that the single common theme amongst  
13 all of these emails post-election leading up to January 6th is the Democrats are trying to  
14 steal the election and there was election fraud and the Presidency was stolen. And you  
15 pushing back on that was surprising to us because it didn't seem to be based on data or  
16 facts. That's all we were trying to say.

17 A Sure. I'm not pushing back on -- I -- again, I don't -- I feel like we  
18 are -- you're mischaracterizing what I am saying. And so, I will say it, outline it once  
19 more.

20 Election laws were changed throughout the country by Democratic Governors  
21 using their emergency powers because of COVID, which created mass confusion among  
22 the electorates. Okay? Take that, couple it with people not knowing when to vote,  
23 how to vote, election ballot security safeguards being removed creates an environment  
24 for fraud, which according to you is what the emails stipulate. I agree that an  
25 environment was ripe for fraud and there could have been emails that stated that.

1           As far as what Eric Trump said in an email, you would have to ask him. I don't  
2 know.

3           Q    I -- first of all, Eric Trump did not say that. It was the RNC copywriters who  
4 drafted it. But second of all --

5           A    I thought you said Eric Trump sent it.

6           Q    No, no. You know how they send the emails from surrogates and they say  
7 Eric Trump is sending it, but it is the copywriters who draft it and then it purports to be  
8 from Eric Trump, Lara Trump, surrogates of the campaign.

9           Mr. Steggerda. [REDACTED], are you just trying -- are you trying to ask him whether  
10 at the time he had an awareness of the kind of the general theme --

11          Ms. [REDACTED]. I was.

12          Mr. Steggerda. -- in some of these emails about Dems trying to steal the  
13 election, whether he has some general awareness of that?

14          Ms. [REDACTED]. I was.

15          Mr. Steggerda. Is that really the --

16          Ms. [REDACTED]. Todd, I actually think Mr. Walters understood the question.

17                BY MS. [REDACTED]:

18          Q    And what's interesting to me is that your answer is an understandable  
19 answer in the sense that it reflects nuance, because I don't think sitting here today you  
20 would look at us and say, the Democrats were trying to steal the election. I don't think  
21 you would say that. What you said was a very nuanced explanation for your concerns of  
22 changes in laws that created an environment for fraud.

23                And what I'm asking is, is do you remember ever seeing a single email that  
24 explained it in the intelligent nuanced way you just portrayed it? Because we've read  
25 600, and what they say is the Democrats and the Liberal elites are trying to steal the

1 election. They hate you. Let me repeat that one. They hate you.

2 Is that consistent with your very nuanced intelligent description?

3 A I mean, I would say there have been multiple instances of Democrats  
4 publicly saying they don't like Republicans and that they, you know, hate Republicans.

5 Q I'm not -- Mr. Walters --

6 A I mean, so, yeah, I do think that --

7 Q Mr. Walters, I'm not asking for --

8 A -- Democrats hate Republicans.

9 Q I'm not asking for a whataboutism. A moment ago you gave a very  
10 intellectually based explanation for a change in laws that could create an environment of  
11 fraud. And what I'm asking you is, do you think that's consistent with the messaging  
12 continuously post-election leading up to January 6th that Democrats hate you, they're  
13 trying to steal the election, and the Liberal mob is trying to steal your vote? Is that  
14 consistent?

15 A The messaging that I just mentioned is consistent with what the RNC  
16 messaging was and what the RNC put out. If the TMAGAC messages that you are  
17 referencing, which, again, I have not reviewed all 600, is not -- I -- I'm sorry, I cannot say if  
18 it's consistent with that. I'll take you at your word. If it's not consistent with that, I am  
19 not aware. Again, I was involved in approving the emails. I wasn't involved in that  
20 process.

21 Q Have you reviewed a sampling? Have you reviewed any of them, the  
22 TMAGAC emails?

23 A I just stated that I had, I'd seen a couple of them.

24 Mr. Steggerda. I would say, you know, what emails I showed him I think are  
25 protected. He has said he's seen some. I'm talking about this process. You know,

1 back in the day, he doesn't remember seeing them, as he's testified to.

2 Mr. [REDACTED]. Mr. Walters, I'm going show you what's been marked as  
3 exhibit 21.

4 Mr. Walters. Okay.

5 Mr. [REDACTED]. And what we want to understand, Mr. Walters, is --

6 Mr. Steggerda. Do you want to -- I'm sorry. Can we take a break? You know,  
7 we've been going for an hour and 15.

8 Ms. [REDACTED]. Is there any chance -- Todd, is there any chance we could push  
9 forward a little bit, because we actually, we're going to have to take a break at about  
10 11:45, 11:50-ish anyway. So if you can power through just maybe 30 minutes more.

11 Mr. Steggerda. Well, I would -- I would, you know --

12 Mr. Walters. I actually really need to use the restroom.

13 Mr. Steggerda. I think an hour 45 is just too long with -- I mean, we're -- I think  
14 we need a short one.

15 Ms. [REDACTED]. That's fair.

16 Mr. Steggerda. Maybe 3 minutes, 3 minutes.

17 Mr. [REDACTED]. We'll give you 4, Todd.

18 Mr. Steggerda. Okay. Thanks.

19 Mr. [REDACTED]. We'll see you all in 5. All right.

20 [Recess.]

21 BY MR. [REDACTED]:

22 Q Mr. Walters, I want to bring it back to your role overseeing Kevin Zambrano's  
23 work --

24 A Okay.

25 Q -- just so we have a clear record. Is it accurate that you were on the

1 approval email listserv but you do not actively engage on a day-to-day basis unless asked  
2 to? Is that fair?

3 A To -- yeah, to the best of my knowledge, yes.

4 Q And with regard to the substance and the content that went out on TMAGAC  
5 emails post-election, you did not direct that in any way. Is that accurate?

6 A Yeah, to the best of my knowledge it's accurate.

7 Q And as far as the post-election content that was created for the TMAGAC  
8 emails, were you aware at the time as to the general substance of those emails?

9 A I don't recall being aware. Well, I mean, again, let me -- I should rephrase.  
10 Generally, I knew they were talking about Georgia, fundraising in Georgia. I knew  
11 generally there were conversations about recounts, but, I mean, again, that's very  
12 general. Outside of that, I don't recall being involved in the conversations about the  
13 content.

14 Q How did you know they were talking about Georgia?

15 A Well, because we had -- I don't know how much I can go into this, but  
16 strategy meetings about sending staff to Georgia, about mobilizing the folks to give, to  
17 help support the -- to help support the runoffs. Is there a way to donor call a couple of  
18 days after the elections specifically about Georgia to get folks to engage and to give.  
19 Because, like I said, the RNC spent many, many millions of dollars in Georgia staff and  
20 transportation and accommodations and whatnot.

21 Q So is it your understanding that the Georgia runoffs were a prominent topic  
22 in the post-election TMAGAC emails?

23 A Again, I don't know the complete content of all 600 emails and what was  
24 most prominent versus what wasn't. I just know that it was a topic.

25 Q Okay. So you know it was mentioned. You have no concept as to the

1 frequency?

2 A Correct.

3 Q Is that fair?

4 A That's fair.

5 Q Okay. I want to show you what's been marked as government exhibit -- as  
6 exhibit 21.

7 A Okay. Okay.

8 Ms. [REDACTED]. Congressional government.

9 Mr. [REDACTED]. Legislative government exhibit 21.

10 Mr. Steggerda. Yeah.

11 Mr. [REDACTED]. [REDACTED], can you pull that over a bit, please.

12 Now, this is an email that went out on November 4th. And it says here it's a  
13 TMAGAC email. This was drafted by copywriters that worked for the RNC. And it says,  
14 Wow, we are winning like no one thought possible right now. Despite the numbers that  
15 were very obviously in favor of your President, the Democrats will try to steal this  
16 election.

17 And then in the second -- in the third full paragraph it says, We can't allow the  
18 leftwing mob to undermine our election.

19 Is this -- were you aware that emails like this were going out the day after the  
20 election at the time?

21 Mr. Steggerda. [REDACTED] -- before you answer that -- can you scroll down? I just  
22 want to see -- I just want to make sure this is a TMAGAC one. And is this a surrogate  
23 one?

24 Mr. [REDACTED]. It's from President Trump himself and it's a TMAGAC. It  
25 says it is paid for by the Trump Make America Great Again Committee.

1 Mr. Steggerda. Okay.

2 Mr. [REDACTED]. So this is RNC copy.

3 Mr. Walters. So it's TMAGAC copy, it's not RNC copy.

4 Mr. [REDACTED]. Okay. Now, when you say -- I understand it goes out for  
5 TMAGAC, but I'm going to tell you it was drafted by RNC individuals. Do you dispute  
6 that?

7 Mr. Walters. I don't know who it was drafted by. But I do know that both  
8 Trump campaign and RNC had individuals working on TMAGAC copy.

9 Mr. [REDACTED]. Okay.

10 Mr. Walters. I don't know who actually wrote this copy, though.

11 Mr. [REDACTED]. Okay. Mr. Walters, though, and I want to parse out  
12 between things you know versus things you're guessing, because I want the record to be  
13 clear.

14 Mr. Steggerda. Well, [REDACTED]?

15 Mr. [REDACTED]. Hold on, hold on, hold. Let me ask my question.

16 Mr. Steggerda. Wait. You said it's RNC copy.

17 Mr. [REDACTED]. Let me --

18 Mr. Steggerda. And he says not technically, and then you dump on him because  
19 he's just --

20 Mr. [REDACTED]. I'm not dumping on him, Todd. I've asked him -- Todd,  
21 he's not a child. He can -- I'm not dumping on him. I want the record to be clear.

22 When you say it's not RNC copy, I'm not suggesting this is going out on behalf of  
23 the RNC. It very clearly states it's for President Trump. Now, you've seen the  
24 disclaimer at the bottom that says it's for the joint fundraising committee. Right,  
25 Mr. Walters?

1           Mr. Walters. Yes.

2           Mr. [REDACTED]: Do you dispute that RNC copywriters were drafting the  
3 copy for TMAGAC?

4           Mr. Walters. No, I don't dispute that. Like I've said multiple times, both RNC  
5 staff and Trump campaign staff draft -- drafted copyright for the -- for the JFA. But to  
6 say that this is RNC copy is a false categorization.

7           BY MS. [REDACTED]:

8           Q    Mr. Walters, you're the first individual, I believe, that has stated that there  
9 were individuals separate from the RNC copywriters who wrote copy for TMAGAC emails.  
10 This is why --

11          A    Okay.

12          Q    -- we very much want to get from you, what is your basis for that? Do you  
13 know those individuals? You are literally the first person to state that. So we are  
14 trying to figure out, is that in fact true, because nobody else is aware of an individual who  
15 drafted copy for TMAGAC emails who wasn't an RNC employee.

16          A    Sure. So my understanding was how the JFA works, it's part Trump, part  
17 RNC. And my understanding was staff from both the campaign and the RNC were  
18 involved with the JFA, were involved with copy, were involved with ads. That was my  
19 understanding.

20          Q    And I understand that when you say my understanding is this is the concept  
21 of the JFA, we would split responsibilities, things were supposed to be shared, I  
22 completely understand that.

23                What we are trying to pin down is, sitting here today, do you actually know or  
24 have any evidence of the existence of an individual who drafted copy for TMAGAC emails  
25 who was not employed by the RNC?

1           A    I mean -- I don't. But I also can't contend that this was drafted by RNC  
2 staff. Again, I don't know who -- who drafted the email. Again, my understanding was  
3 that both individuals from the campaign and the RNC were sharing responsibilities in  
4 drafting the emails and all responsibilities regarding the JFA.

5           Q    And I totally understand that. The only point we were trying to make to  
6 you, understanding that your level is up here, and we've talked to everyone largely  
7 involved below you, is there's not a single other individual who has said that a non-RNC  
8 staff member wrote copy for TMAGAC emails. So that's why, if you have actual  
9 evidence of that, that would be super relevant.

10           What I'm understanding you to say is you don't have evidence either way. Your  
11 understanding was the JFA worked a certain way, there could be, there might not be.

12           A    Right.

13           Q    But you don't actually know.

14           A    Correct.

15           Mr. Steggerda. That's right.

16           Ms. [REDACTED]. Okay. So when we represent, because we have interviewed some  
17 other people, when we represent that certain emails were drafted by RNC copywriters on  
18 behalf of TMAGAC, understand it's because we have interviewed other people and have  
19 gotten evidence from elsewhere that you might not have.

20           Mr. Walters. And that's totally fine. That still doesn't change that this is not  
21 RNC copy. And, [REDACTED], that's how you referred to it and it's just not. It's TMAGAC copy,  
22 because RNC copy was separate for RNC-specific emails. And I'll still contend that my  
23 understanding was that staff from both entities worked on copy for emails.

24           Mr. Steggerda. I -- I think, just to clarify, just -- I think there's just a foun- -- I  
25 think the problem is, is just the foundational side of his understanding of how TMAGAC

1 was working in the annex. So I don't think he's trying to be combative. He's here  
2 cooperating, this is the second round.

3 Ms. [REDACTED]. Oh, no.

4 Mr. Steggerda. But, [REDACTED], my simple point is that, you know, if you ask him  
5 just what might seem like a basic fact based on the other aspects of your investigation did  
6 RNC employees draft this email, and he says I don't know, he's not being combative; it's  
7 just a -- it's a reflection of the fact that foundationally, as he said, he doesn't really have  
8 an understanding of how the copy was put together and who actually drafted it, I think  
9 is --

10 Ms. [REDACTED]. And, Todd, I think that --

11 Mr. Steggerda. That was a long objection, but it's a foundational problem I think  
12 we have with Richard's involvement in it.

13 Ms. [REDACTED]. No, no. Here's the thing. I would actually understand more if his  
14 answer had been "I don't know." What was disconcerting was what seemed to be the  
15 suggestion that he knew of actual employees other than RNC copywriters who might  
16 have written this, which would have been extreme news to us. So that's why I want to  
17 be very careful, because the answer "I don't know" is actually very clear, you have no  
18 knowledge either way. But when you suggest that you have actual evidence of a  
19 non-RNC employee who might have drafted this email, that's a whole other ballpark.

20 You know about a JFA and about the way that something may have been run.  
21 What I want to make crystal clear and delineate is, you don't actually have any evidence  
22 or knowledge that there was an individual who ever wrote copyright copy for TMAGAC  
23 who did not work for the RNC, who in fact worked for the Trump campaign.

24 Mr. Walters. Look, I, again, not trying to be combative, but, sure, then, I don't  
25 have any knowledge of an RNC member ever writing this copy other than you saying it.

1 Right? All I know --

2 Ms. [REDACTED]. Okay. Well, I --

3 Mr. Walters. No. Excuse me. All I know -- all I know is that the joint venture  
4 included both RNC staff and Trump campaign staff. And my understanding, that staff  
5 from both entities were drafting copy for emails. And what I am saying is I don't know  
6 of a spec- -- what specific staff member from either entity drafted copy or if that didn't  
7 happen. I am telling you what my understanding was.

8 Mr. Steggerda. Is it really more of your expectation or speculation, is that what  
9 we're really --

10 Mr. Walters. Correct. I mean, this is what my understanding of how the -- a  
11 JFA works.

12 Ms. [REDACTED]. I'm confused, because I -- I thought we spent the first 30 minutes  
13 going over your understanding of what Mr. Zambrano was responsible for, what  
14 Mr. Bodenheimer was responsible for, and it was supervising RNC copywriters who draft  
15 both RNC and TMAGAC emails. So I thought we actually had established quite well  
16 earlier that you were aware of RNC employees who drafted TMAGAC copyright. Are we  
17 now going back on that?

18 Mr. Walters. You first -- you just said RNC employees drafting RNC emails, and  
19 then you're saying RNC employees drafted TMAGAC emails. They are not  
20 interchangeable to me. Okay? So -- and, again, perhaps it's me, I'm just confused, but  
21 RNC employees drafted RNC-specific emails. And R -- and my understanding was that  
22 RNC employees and Trump campaign employees worked together to draft TMAGAC  
23 emails. And what you're saying is that you don't know of any Trump campaign  
24 individuals being involved with this. And I am saying that is news to me, because my  
25 understanding was that they worked together.

1 BY MR. [REDACTED]:

2 Q Mr. Walters, let's just parse out what your lawyer said, which might help  
3 clear this up. When you say your understanding, understanding to a lawyer means you  
4 have a basis and fact to believe that. If you say it was your expectation, that's different.  
5 Your lawyer noted that it might be your expectation.

6 So is it your expectation that RNC employees and Trump campaign employees  
7 worked together to draft these --

8 A Correct.

9 Q -- and were both copywriters, that you said it's your expectation that was  
10 what was going on?

11 A Yes.

12 Q Now, is it fair to say you don't have an actual understanding, based in either  
13 information given to you by someone else or from your own observation, that, in fact,  
14 both RNC and Trump campaign employees drafted copy for TMAGAC?

15 A Yes. By your definition, yes. That is helpful. Thank you.

16 Q Okay. So -- but you do have an understanding, as I've defined it, that RNC  
17 employees drafted copy for TMAGAC. Is that correct?

18 A Correct. And for RNC emails.

19 Q All right. So the one area that you do not have any understanding about is  
20 the involvement of Trump campaign copywriters. Is that correct?

21 A It's correct I do not have an understanding of that but an expectation that it  
22 happened.

23 Q Okay. So let's go to exhibit 22, which is another TMAGAC email that came  
24 out near the time of this exhibit I just showed you. And here it says, Breaking:  
25 Democrats plan to steal the election.

1           And then you can see in the second full paragraph it says, It's no -- if we can stop  
2 scrolling, yeah.

3           It's no secret that Democrats will try to steal this election.

4           And it says, They can't stand the thought of America rejecting their candidate so  
5 they will do whatever it takes to manipulate the results.

6           Have you seen emails like this that came out of TMAGAC? Have you seen these  
7 kind of emails? Sorry. Yeah. Let me clarify.

8           This email comes out November 4th. At the time in November 2020, were you  
9 aware that TMAGAC was sending emails like this?

10          A    I -- no. I don't recall seeing this email or this -- this type of content. But, I  
11 mean, with that being said, I do know that this is the kind of rhetoric that was coming out  
12 of the White House from the President. I am aware of that.

13          Q    And our understanding, which -- what we understand, Mr. Walters, is that  
14 the copywriters would look to take the messaging from the candidate, from both tone  
15 and substance and content, to re-create that, because it's obviously going to supporters  
16 of President Trump. So I think your understanding is consistent with ours.

17          What I want to ask you, though -- I'm sorry, did you --

18          A    Yeah. Yes, that would be my expectation.

19          Q    Okay. Now, from the RNC perspective, as the chief of staff, would  
20 you -- from me read reading this, it appears to be different in -- it appears to be  
21 substantively different from your -- what you espouse was your understanding as to the  
22 state of potential fraud on November 3rd. Is that fair -- is that a fair reading, that  
23 what -- the assertions being made here are substantively different than the concerns you  
24 espouse concerning the altering processes that may allow an increase in fraud? Is that a  
25 fair reading?

1           A     So I -- look, I don't want to get into parsing out words or, you know, word  
2     games.    But, again, I go back to Democrats -- I don't separate them necessarily.    Like,  
3     Democrats changing -- using COVID to change laws throughout the country, to create  
4     mass confusion among voters, to remove voting safeguards, to remove ballot security  
5     created a massive environment for fraud.    And I imagine that this type of content was  
6     coming from that, as well as the rhetoric of the President.

7           Q     So when you say "as well as the rhetoric of the President," you're  
8     now -- you're not being clear again, right.    Because now you're parsing out two sources.  
9     I'm asking something very specific.    This --

10          A     I think they can --

11          Q     Mr. Walters, we can't speak over each other.    When I'm done, you can  
12     speak.

13          A     I'm sorry.    I'm sorry.

14          Q     It says, Breaking:    Democrats plan to steal the election.

15                 And what I want to understand from you is that, is your view that -- and it says  
16     again, It's no secret that Democrats will try to steal this election.

17                 As I read this, it is speaking about a future plan that Democrats are going to try to  
18     subvert the will of the people.    Is that a fair reading of what this email is suggesting?

19          A     So, like I said, [REDACTED], I don't think -- I do think you can put them together.  
20     And I don't think it's fair to say that one is -- one is relevant and one isn't.    Democrats  
21     changed election laws, as I've said multiple times, throughout the country to create  
22     confusion among voters.    They used their emergency powers to strip safeguards from  
23     ballots.    And what I am saying is that led to an atmosphere where fraud could happen.

24          Q     Now, twice you said Democrats changed the laws to create confusion.    Is it  
25     your --

1 A Yeah.

2 Q Okay. So it's your assertion that Democratic legislators at the State level  
3 intended to create confusion. Is that your testimony?

4 A I don't know that that was in -- that that was their -- I -- no, I don't know that  
5 that was their -- that they wanted to create confusion. I apologize if I misspoke. It did  
6 create confusion.

7 Q Okay. So, again --

8 A Whether there was intent, I don't know.

9 Q Do you think this email, one, suggested there was an intent to steal the  
10 election or it's just a by-product of a stolen election?

11 A I'm sorry. Again, I'll say it for the third time. Democrats changed election  
12 laws throughout the country, removed voting safeguards from throughout the country,  
13 stripped ballot protections that we have had in this country for decades and which  
14 created, whether they intended it for to or not, created confusion and created an  
15 atmosphere for fraud to exist. And what I think -- I think that this email couples that  
16 with the rhetoric from the White House and from the President.

17 Q Mr. Walters, you can repeat the talking point all day long and we'll be here  
18 all day long. I don't think it's helpful. And what we want to do, Mr. Walters, we want  
19 to be accurate. It doesn't matter to me what the answer is. I just want a clear answer  
20 and a clear record. And repeating the same talking points is not helpful. It does not  
21 give --

22 Mr. Steggerda. It is not --

23 Mr. [REDACTED]. Todd, please don't interrupt. Let me finish. You can  
24 speak when I'm done.

25 Mr. Steggerda. It's not a talking --

1 Mr. [REDACTED]. Todd, please don't speak. Todd, we've been asked not to  
2 speak over each other. When I'm done, if you want to speak, you can speak.

3 BY MR. [REDACTED]:

4 Q Mr. Walters, you repeated the same talking point again and again. These  
5 emails come out from people who are in your chain -- directly of supervision. What we  
6 want to understand, Todd, is the answer could very -- excuse me, Richard, the answer  
7 could very simply be what you suggested at first, which is RNC copywriters are drafting  
8 messaging that is consistent with what President Trump is saying, and he is the candidate  
9 and that's what leads TMAGAC's messaging. That's a perfectly understandable result.

10 What I'm trying to parse out, Mr. Walters, is whether the RNC's position you find  
11 to be consistent with the messaging in this these TMAGAC emails or inconsistent. Right?

12 Is this what -- and when you say -- when you use the language of it marries,  
13 basically, let's call it the election integrity argument, married with the messaging coming  
14 out of the campaign, that, to me, as I understand what you're saying, suggests that, no,  
15 by itself, this is not what the RNC is saying. You need to marry that with what the  
16 candidate is saying. And when you put those together, then is all makes sense.

17 But, of course, President Trump is saying openly the Democrats are going to try to  
18 steal the election. That doesn't help us understand. I want to get the RNC's position  
19 from your vantage point. Is the RNC's position what this email is saying or is it not? Is  
20 it something else?

21 And I'm not asking you to repeat the same lines about changing processes. We  
22 understand that and we understand it well. I'm asking you here, this email goes to  
23 millions upon millions of people. This messaging is repeated again and again and again.  
24 And it is not talking about, oh, processes have changed that were in place for decades.  
25 That's not what the emails say. The emails say the Democrats are trying to steal the

1 election. The emails say the leftwing mob wants to reject your candidate. That's what  
2 the emails say.

3 And I'm asking you the RNC's position and your understanding, is that what it was  
4 as well. That's what I'm asking you.

5 A So, [REDACTED], I understand you're fishing for an answer that you want, and I'm  
6 not going to give you just what you're looking for. Okay? So I'm going to go back to  
7 what I've said now for the sixth or seventh time. Democrats used COVID as a way to  
8 change election laws throughout the country, as well as remove safeguards from ballots  
9 throughout the country that created confusion and created an atmosphere ripe for fraud.  
10 And I believe that this email and probably others that were sent came from that, coupled  
11 with rhetoric from the President.

12 I think it was unfair to think that the copywriters wouldn't take into consideration  
13 what Democrats were doing throughout the country to, once again, remove safeguards  
14 from ballots, create confusion, and create an atmosphere ripe for fraud. So I think it  
15 comes from both places.

16 Q Are you aware of the RNC challenging the election wins of any Republican in  
17 any race in 2020, as saying that those results were questionable on the same ballots  
18 where Joe Biden won?

19 A I'm not.

20 Q Why not?

21 A I don't know. I'm just not aware of it.

22 Q Did you ever have any concerns that Republicans who won, that every single  
23 Republican who won their House race across the country won on a ballot with Joe Biden  
24 on it as well, and for the States that he also won, that there could be fraud for those  
25 Republican seats, or did that the not matter for you?

1           A    I -- I think that's an unfair question.  If you want to talk just about 2020,  
2           look at what the RNC has done, regardless of whether Republican or Democrat.  We  
3           filed lawsuit in Pennsylvania yesterday getting involved in our Republican --

4           Q    Sir, sir, we have to --

5           A    Do not interrupt me.  Do not interrupt me.  Do not interrupt me.  Do not  
6           interrupt me as I did not interrupt you.  Thank you.

7           We filed a lawsuit in Pennsylvania yesterday in a -- in a Senate race between Dr.  
8           Oz and David McCormick, who are running for Senate, regarding ballots that are not  
9           dated being counted.  So, yes, there are instances where we do get involved, where we  
10          do intervene in areas that may just involve Republicans because it is for what is best  
11          when it comes to election integrity and for what is best when it comes to ballot security.  
12          So there are -- that is an example of us getting involved.

13          Ms. [REDACTED].  Did you do any fundraising or messaging surrounding that litigation?

14          Mr. Walters.  We've done a lot of messaging around it, yes.

15          Ms. [REDACTED].  Did you --

16          Mr. Walters.  The chairwoman has --

17          Mr. [REDACTED].  [Inaudible] fundraising question.

18                 BY MS [REDACTED]:

19          Q    Did you do fundraising --

20          A    The chairwoman -- the chairwoman has been on TV three times about it,  
21          number one.  And she was on today and on TV yesterday about it.  And as far as  
22          fundraising goes, like I said, this happened yesterday and we pulled our fundraising offline  
23          because of the school shooting in Texas.

24          Q    This was Pennsylvania, you said?

25          A    Correct.

1 Q In the messaging, did Ms. McDaniel say that they were trying to steal the  
2 election in Pennsylvania?

3 A I have not seen her interviews. I've been here with you.

4 Q Are you aware of any messaging where the discussion in Pennsylvania over  
5 this ballot issue was that the election in that situation was being stolen?

6 A I haven't seen the interviews.

7 Mr. [REDACTED]. Are you generally aware of Ms. McDaniel's positions  
8 before she goes public or is that -- are you cut out of those decisions?

9 Mr. Walters. It depends. This specific instance I have not been involved in her  
10 immediate prep or conversations on it.

11 BY MS. [REDACTED]:

12 Q You can understand the concern, though. And I think that the question  
13 that we were trying -- I -- it really seemed like an easy question on its face because you  
14 spent quite a bit of time explaining what the RNC's position was and its extensive  
15 explanation of changing laws for COVID, not a single -- not a single sentence or word of  
16 which made it into a fundraising email issued by TMAGAC. Not a single thing that you  
17 said is the position of the RNC in terms of election integrity made it into these fundraising  
18 emails, other than they're trying to steal the election.

19 And it didn't seem like a difficult question to say you have stated the RNC's  
20 position multiple times. That position has never, in fact, been stated in a single TMAGAC  
21 fundraising email. To the contrary, a simplified, not nuanced, accusatory message of  
22 they're trying to steal the election is what is being sent out. Is A consistent with B?

23 It seemed like a softball, but you seem unwilling to say that your extremely  
24 extensive nuanced position was never, in fact, represented in a single fundraising email.  
25 We thought we could just ask the honest question, if they never sent your message, if

1 they sent something different, was that inconsistent with the RNC's position, because you  
2 have sat here and explained it quite well over and over. We didn't think it was  
3 disingenuous to say, that message was never conveyed in a single TMAGAC fundraising  
4 email. Was it?

5 We've looked at them, we have not seen anything similar to the explanation  
6 you've provided. And all we thought was you could agree that these emails did not  
7 convey the position of the RNC.

8 A I apologize that I'm not fitting your narrative. However, I think it's difficult  
9 for you to sit there and say that you understand how 40 million people received these  
10 emails, how they may have -- how it may have been conveyed to them or how they may  
11 have understood it, number one. Number two, I also think that copywriters can see  
12 what is going on with what the RNC is doing and what we're saying, as well as what the  
13 President is saying, and come up with an email. I don't think that that's out of -- such a  
14 crazy idea and out of the realm of possibility.

15 Q I understand what you're saying. And I will tell you, as somebody who  
16 reads this email just as a basic American and hears the message that's in it, I have sat here  
17 and heard you explain extremely effectively what is effectively an election integrity  
18 argument. There were laws changed. Those changes opened up gaps that could have  
19 possibly led to fraud.

20 And my only point was, if you have a basic understanding of English and you read  
21 the 600 or so fundraising emails between the election and January 6th, you will never see  
22 the nuanced election integrity argument that you have put forward as your opinion  
23 consistent with the RNC's position. And I'm not trying to make a narrative. I'm stating  
24 a fact. That has never been expressed in an TMAGAC email, so the logical conclusion  
25 was these emails did not reflect the RNC's vision.

1           A    That's just not true.  The email that you have up right now, there's a line  
2   that says, we need your help to defend the integrity of our election.  That's literally  
3   election integrity.  Defend the election integ- -- I mean, that's the email that's up right  
4   now.  So for you sitting here saying that this was never said is not true.  As a matter of  
5   fact, this goes directly into what I was referencing in the hybrid of what the RNC was  
6   saying, as well as what Trump was saying.  You had the rhetoric, which I'm assuming this  
7   is coming from Trump, without knowing for sure, plus what the RNC is saying is we need  
8   your help to defend the integrity of our election.

9           Q    So the email is consistent with the RNC's position.

10          A    It is a hybrid, what I've been saying along.  It is a hybrid.

11          Q    Okay.  So pick out for me the piece that's Trump and not RNC.

12          A    I don't know.  You'd have to ask the copywriters what was going through  
13   their mind when they wrote it.  But what I am telling you is that I do know for a fact, as  
14   we've been saying, defend election integrity, as I've sat here and said over and over again,  
15   Democrats used COVID as a way to change election laws, to strip safeguards from our  
16   ballots, to create confusion.  Whether they intended to or not, confusion was created,  
17   which undermined the integrity of our election.  There was an email up that I was  
18   reading.  It's now moved on.  But there was a line that -- I don't know where it went,  
19   but --

20          Q    Hold on.  Can we scroll back?

21          A    That the line states, We need your help to defend the integrity of our  
22   election, which was the position of the RNC multiple times.

23          Q    Okay.  And I appreciate you identifying the sentence that is consistent with  
24   the RNC's position.

25                Let's try this.  It's no secret that Democrats will try to steal this election.  They

1 can't stand the thought of America rejecting their candidate so they'll do whatever it  
2 takes to manipulate the results.

3 Is that consistent with the RNC's position at the time?

4 A I think at the time our position was there was so much confusion created  
5 that the results could have been manipulated.

6 Q So you can say yes, it is your position on one sentence, but you can't say yes  
7 or no for that -- for that paragraph, you cannot say yes or no, whether that was consistent  
8 with your position, without modifying it and explaining it and extending it to make it your  
9 position?

10 A I just -- I think it's unfair that you sit here and think that 40 million people  
11 who received this email convey it in a way only you do or that your panel does or that  
12 your partisan committee does. I believe that people can see this and believe that  
13 because election integrity -- because elections our processes would change, that the  
14 integrity of our elections were, you know, at risk, and that created confusion over and  
15 over and over again. And the results could have been manipulated.

16 I mean, it's just -- it's ridiculous to me that only this -- you believe this can only be  
17 viewed through your lens.

18 Q Mr. Walters, let me explain something to you. You don't know me. You  
19 don't know me.

20 A Right.

21 Q But your counsel has seen me in countless interviews. And I think pretty  
22 comfortably he will tell you that I'm probably one of the least partisan people that you'll  
23 meet and that I have not in any way treated this as a partisan activity. You can  
24 take -- you can message however you want.

25 I'm asking you a simple sentence, which was, you stated the sentence, we need

1 your help to defend the integrity of our election, was consistent with the RNC's position  
2 at the time. I assumed that was because you are number two at the RNC and you have  
3 knowledge about what the RNC's position was at the time.

4 I asked you a simple question that was the paragraph above, is that consistent  
5 with the RNC's message at the time. And you are unable to say yes or no without a  
6 qualifier, which suggests that that paragraph alone was not consistent with the RNC's  
7 message, because that's grammar and English and not partisan. And I'm asking you a  
8 question that has nothing to do with either of our political beliefs.

9 I'm asking, as the number two at the RNC, competent in your position at knowing  
10 the message, is the second paragraph consistent with the RNC's position or do you have  
11 to add a bunch of qualifiers to make it the RNC's position?

12 A What I've said over and over again is that this email and others like it are a  
13 hybrid of the RNC's position and what Donald Trump was tweeting out or saying at the  
14 time. You actually started off this series of questions with saying nothing in these emails  
15 echoed the position of the RNC, even when it was right in front of you. So I've proven  
16 that to be incorrect.

17 As I've said, we need your help to defend the integrity of our election, was a  
18 position of the RNC. I understand that you want to try and manipulate this in a way that  
19 fits whatever -- you say you don't have a narrative, fine -- but whatever you all want it to  
20 be. But my point is Democrats changed election laws, they stripped safeguards from  
21 ballots, they created a ton of confusion -- again, whether they meant to or not, I won't get  
22 into that -- that could have led to ballots and the results being manipulated.

23 And because it isn't as clear-cut as you want, you know, I can't help that, but that  
24 is my view and that is the position of the RNC.

25 Q I think you actually answered the question when you could not state that

1 that paragraph was or was not consistent and it's a hybrid. So it's the portion of the  
2 position that Trump adds, if I'm understanding you, to the long nuanced explanation that  
3 you have that is the RNC's position. But sitting here today, you can't simply say yes or  
4 no whether that paragraph is the RNC's position, without claiming it's a hybrid, without  
5 adding explanation, and without giving a lengthy explanation of what the RNC adds to  
6 that, because otherwise it's just Trump's narrative. And that's fine. I get it.

7 A But it's not true.

8 Q But you just sat here and effectively established that. And no matter how  
9 much --

10 A I didn't.

11 Q If we stripped this out -- you did, because you could say --

12 A I didn't.

13 Q We need your help to defend the integrity of our election. You could say  
14 that is, in fact, consistent by itself with the RNC's position. You are able to logically  
15 reason that out. But somehow for the paragraph above, you cannot answer that yes or  
16 no without saying it's a hybrid of the RNC and Trump. And we will never know because  
17 you cannot tell us what --

18 A Well, we started this conversation --

19 Mr. Steggerda. Can I --

20 Mr. Walters. Well, I just want to make a point. We started this conversation  
21 with you saying nowhere in this email could I point to anything that was the RNC's  
22 position. So that's how you started the conversation.

23 BY MS. [REDACTED]:

24 Q And here's the thing --

25 A Excuse me. Please don't interrupt me.

1 Q Fine.

2 A Okay. And like I said, I pointed out that that is incorrect. As I imagine this  
3 type of language, we need your help to defend the integrity of our election, is throughout  
4 other emails as well. And so now you would look to parse it out paragraph by  
5 paragraph. And what my point is, what I've said all along, is that this email, I'm  
6 imagining if I were the copywriter, which I don't know what was going on in their head, is  
7 that they are taking a hybrid of RNC messaging, which we see here, and Trump  
8 messaging, which I'm assuming part of this is Trump messaging. I believe he has  
9 previously said that the Democrats tried to steal the election. I don't know for sure, but  
10 it sounds like something he probably said. And I believe that that is the hybrid that I am  
11 referencing. I don't know --

12 Q No, no. I accept your correction that we were wrong. I accept your  
13 correction that, as the number two at the RNC, you pointed out to us that we were  
14 incorrect, because that sentence, we need your help to defend the integrity of our  
15 election, was in fact consistent with RNC messaging. So you were right and you knew  
16 that.

17 What I can't understand is what seems like the disingenuousness of then not  
18 being able to say yes or no, that the paragraph standing above it, taken by itself, without  
19 any additions or qualifiers, was or was not consistent with the RNC's position. That to  
20 me seems disingenuous.

21 Mr. Steggerda. Objection. I -- I -- I don't want to say I'm offended, because I  
22 appreciate the dialogue. You've got a witness here who is trying his best to give a really  
23 complicated answer to a complicated question that has nuances to it. What he's said  
24 now at least six times is that he believes that probably is the type of language that the  
25 President used. He also pointed to the third paragraph and said that's more specifically

1 consistent with what he had been trying to explain from a process.

2           When you ask him a straight yes or no question that basically calls for a heartfelt  
3 academic description of what he really believes, and then for you to say it's disingenuous,  
4 when he's trying to be truthful, he's trying to tell you exactly what he thinks on these  
5 complicated issues. And the reality is, which concerns me, we're not doing this over a  
6 beer, we're doing it in a highly complex and challenging scenario where this transcript is  
7 going to get out to the public, you've got DOJ asking to read transcripts. And so he's  
8 trying to be truthful here. That's the number one goal. And I'm sorry that a yes or no  
9 answer doesn't fit perfectly with what you want. But he's going to keep saying it over  
10 and over and over again the way that he feels it truthfully. And for you to say it's  
11 disingenuous, I just think it's just too much.

12           And I -- I've worked really, really closely and everything that you said about our  
13 relationship I think is true, but that I -- I've just got to object to calling my witness  
14 disingenuous.

15           Ms. [REDACTED]. Todd, you answered the question in your answer, because what I  
16 asked him was -- you said he has answered with nuance. And the question that I said  
17 was, that second paragraph, my understanding from everything Mr. Walters said, that  
18 second paragraph is not consistent with the RNC's position without adding all of the  
19 nuance he's been saying.

20           And all I was saying was, if you did add anything to that paragraph, if you're the  
21 person reading it sitting here today, start at the paragraph to the end of the paragraph  
22 with no addition of nuance, just like an average American, like the hundreds of millions  
23 who received this would, if you started reading that paragraph and you ended reading  
24 that paragraph, without the addition of all the nuance that Mr. Walters provided, all I  
25 asked was, is that paragraph standing alone consistent with the position of the RNC at the

1 time. And I'm sorry, I thought that could be a yes or no answer.

2 Mr. Walters. Well, it can't be. And, unfortunately, you know, it can't be,  
3 number one. And number two, I don't think it's fair for you to sit here and say, just this  
4 one paragraph sitting here reading it, you know, 2 years after the election, when in fact  
5 the average American was very much so in tune to what was going on, what was going on  
6 in TV, what they were reading in their papers, what they were seeing on social media, like  
7 very much so. It's not a black and white answer. It's just not.

8 Ms. [REDACTED]. Mr. Walters, I really apologize. I don't mean to be rude. I have to  
9 step out, so please don't -- please don't take this the wrong way. They're going to  
10 continue. I just -- I had a hard stop at noon that I'm late for, and I apologize. I just  
11 didn't -- we were in the middle of something, and I apologize for having to leave, but I just  
12 wanted to apologize.

13 Mr. Walters. Thank you.

14 Mr. Steggerda. Thank you, [REDACTED]

15 Ms. [REDACTED]. I'll be back. Apologies.

16 Mr. Steggerda. Okay.

17 BY MR. [REDACTED]:

18 Q Mr. Walters, I'm going to show you what's been marked as gov -- excuse me,  
19 as exhibit 4. It is an email from -- you know, actually, [REDACTED], let's start at exhibit 3.  
20 Let's go to exhibit 3.

21 Mr. Walters, this is an email from November 5th.

22 If we can scroll down to the bottom of page one.

23 It's a November 4th email. Subject line says, For approval: Election defense &  
24 Pennsylvania. And it says -- it's an email from Julia Trent. Do you know who that is?

25 A I don't. Not -- I don't -- I think she was on the digital team, but I don't know

1 her personally.

2 Q Okay. Now, scrolling through here --

3 A Sorry. I said she was on the digital team, she still may be. I don't -- I don't  
4 know.

5 Q Okay. And this is one of the approval emails, right, that we have been  
6 talking about. I'm going to scroll -- you can scroll down a bit to page 2, please.

7 Is it fair to say this looks like one of the approval emails we've been discussing?

8 A It could. Yeah, yeah, sure.

9 Q When you say it could, I mean -- what I understand and witnesses have  
10 testified to is that this is -- what I understand that witnesses have test -- what I know is  
11 that witnesses have testified, including -- that this is the approval emails of how TMAGAC  
12 texts and emails were approved from RNC --

13 A Okay.

14 Q -- copywriters. So what I'm trying to understand, is this your understanding  
15 of the emails we've been talking about?

16 A Yeah -- well, sorry to -- these look like text messages. I think that's why I'm  
17 confused.

18 Q That's fair. They are text messages. And we can scroll down further.

19 And our understanding is that these approval chains came with both texts, as you  
20 see here at the top.

21 A Okay.

22 Q And then you can now see here, this is an email -- you can stop, please.

23 And you see here this email says, The left will try to steal this election. And I'm  
24 calling on you to step up and fight back.

25 So that's an email here. You can see at the bottom of this email it says, President

1 Trump wins Pennsylvania.

2 Is this fair to say that this is when the approval emails, that while you didn't  
3 engage with them, you were on them? Is that fair?

4 A I -- I assume I was. I don't know for sure. But I assume I -- if this went to  
5 the approval chain, then I would have been on it.

6 Q Okay. Were you aware of any discussions regarding President Trump  
7 preemptively claiming that he won Pennsylvania?

8 A Not that I recall.

9 Q Okay. So election was November 3rd. We get to November 7, Joe Biden  
10 is made -- is declared President-elect by the general media. That's Saturday, November  
11 7th. Is that what you recall?

12 A I believe -- I believe that's what it -- correct, it was Saturday.

13 Q And then we have -- where were you when you heard that the media called  
14 the race for President -- now President Biden?

15 A I believe I was in Washington, D.C.

16 Q And when that happened, did that change your view as to the state of the  
17 Presidential race or have no impact? And what was your view -- on or about November  
18 7th, what was your view as to the state of the race?

19 A My view was that the -- there was a lot of pending and ongoing litigation and  
20 that that's where our focus was in that litigation with regard to this specific race. I was  
21 also focused on Georgia at the time with the two Senate runoffs there.

22 Mr. Steggerda. [REDACTED]

23 Mr. Walters. [REDACTED]

24 [REDACTED]

25 BY [REDACTED]:

1 Q [REDACTED]

2 A [REDACTED]

3 Q [REDACTED]

4 A [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 Q And when did you get back to work?

8 A I don't -- I'm sorry, I don't remember the exact date, but I think we were  
9 running into Thanksgiving around that time, but I don't remember the exact date.

10 Q Well, is it fair to say you were back to work by end of November?

11 A Yes, that's fair.

12 Q Okay. And I want to zoom out a bit before we go into more approval  
13 emails. Is it your view that there was any fraud that occurred that was dispositive as to  
14 who the President would be, as in who won the election?

15 A I'm not sure -- I'm not sure I completely understand the question. I'm  
16 sorry. Do you mind restating it?

17 Q So is it fair to say that in every election there's some level of fraud?

18 A Probably. Yes, I would think so, yes.

19 Q All right. So, for example, someone may vote on -- on behalf of a deceased  
20 spouse and --

21 A Sure.

22 Q -- that would be an example fraud. Correct?

23 A Right.

24 Q But if that were the only example of fraud, let's just take for the purposes of  
25 hypothetical, the only fraud that occurred, that fraud would not be dispositive as to who

1 won the race if the race were decided by more than one vote. Is that fair?

2 A Correct.

3 Q So what I'm asking you --

4 A That's correct.

5 Q -- is that are you aware and do you have a view as to whether there was  
6 fraud that was dispositive as to who won the 2020 Presidential election?

7 A As in today or at the time?

8 Q Let's -- as in today. Sitting here today, what is your view?

9 A I am not aware of fraud -- enough fraud that could have overturned the  
10 election.

11 Q So is it your view that Joe Biden legitimately won the 2020 election?

12 A It is my view that Joe Biden is the President.

13 Q I didn't ask you that, sir. He's clearly the President. Answer the question I  
14 asked you, please. I'm asking you whether he legitimately won the 2020 election. He's  
15 obviously the President. I'm asking whether he legitimately won the 2020 election?

16 A I believe that we will never know the amount of fraud that was committed  
17 or to the extent to which fraud was committed. And so, because of that, I am willing to  
18 say that Joe Biden is the President of the United States. That's where I'm at.

1

2 [12:10 p.m.]

3

BY MR. [REDACTED]:

4

Q But you cannot say whether he's a legitimate President. Is that correct?

5

6

A I don't know that we will -- that we -- again, we'll never know the amount of fraud that could've been committed or that was committed. Again, like, the process of, like, once you separate ballots from envelopes, it's impossible to trace, you know? And so it's hard for me to say other -- that -- anything other than that he is the President of the United States.

10

11

Q Now, in 2016 ballots were separated from votes, as they are every election cycle, right? That happened in 2016 as well, did it not?

12

A Not to the extent that it did in 2020.

13

Q Did it happen in 2016, yes or no?

14

A Yes, but not to the extent that it did in 2020.

15

16

Q Do you know exactly how much fraud was committed in the 2020 cycle in the Presidential race?

17

A I don't --

18

Q And if you do know -- let me finish, please. If you do know, tell us exactly how much it was.

20

A I don't think we'll ever know the exact amount.

21

22

Q And do you think President Trump was the legitimate -- was elected legitimately in 2016?

23

24

25

A I -- I -- I -- I mean, I do. I mean, I -- that's, very much so, contrary to what a number of Democrats have said, calling him an illegitimate President over and over again, but I do believe that Trump was elected legitimately in 2016.

1 Q So take me to your understanding as to, if you both do not know how much  
2 fraud was committed in 2016, how have you arrived at the position that President  
3 Trump --

4 A Sure.

5 Q -- was legitimately elected?

6 Mr. Steggerda. You can do it one more time.

7 Mr. Walters. Yeah, let me -- I'll do it one more time.

8 Mr. Steggerda. One more time.

9 Mr. Walters. It's only been 14 or 15 times.

10 So, in 2020 --

11 Mr. [REDACTED]. Well --

12 Mr. Walters. -- Democrats --

13 Mr. [REDACTED]. But I'm not asking you about 2020.

14 Mr. Walters. No, hold on.

15 Mr. [REDACTED]. I'm not asking you about 2020.

16 Mr. Walters. I will get to -- please don't interrupt me.

17 In 2020 --

18 The Reporter. One at a time, please.

19 Mr. Steggerda. Can you -- hey, [REDACTED]?

20 Mr. [REDACTED]. Yes.

21 Mr. Steggerda. Does the stenographer have the ability to read back the  
22 question?

23 Mr. [REDACTED]. There's no need to read back the question. I can restate  
24 it.

25 Mr. Steggerda. Okay.

1           Mr. [REDACTED]. What I'm asking you, Mr. Walters -- and you can recite all  
2 you want you've said it 17 times. You haven't.

3           And our point here -- and I say this genuinely. We are not looking for political  
4 grandstanding from us or from you. We are not. We are looking to be clear as to what  
5 the RNC thought and why and when.

6           So, here, you just testified that you cannot say whether Joe Biden is the legitimate  
7 President because you don't know how much fraud was committed.

8           I asked you how much fraud was committed in 2016. You said you don't know.  
9 I asked you whether President Trump was legitimately elected in 2016. You say he was.

10          So I want you, in regard to 2016, when you worked at the RNC -- not in the same  
11 position, obviously -- but I want to understand how you determine, without knowing the  
12 amount of fraud, that President Trump was legitimately elected in 2016.

13          Mr. Steggerda. You can answer.

14          Mr. Walters. So it's going to be the same answer for the 18th time.

15          So, in 2020 -- and this will get to your question on 2016 if you'll allow me to finish  
16 this time.

17          In 2020, Democrats changed election laws throughout the country. They used  
18 COVID to create confusion, intentional or not, and to also strip away safeguards from  
19 ballots. And that created an atmosphere of fraud, likely through mail-in ballots, to the  
20 extent we will not -- we will never know.

21          In 2016, you did not have anywhere near the level of vote-by-mail that you had.  
22 All of the safeguards that were removed in 2020 were in place in 2016. And because of  
23 that, I think it is okay to say that Donald Trump was elected legitimately.

24          Regardless of how many times Democrats have said otherwise over and over  
25 again or Hillary Clinton recently saying the election was stolen from her in 2016,

1 regardless of any of that, I do believe that he was elected legitimately in 2016.

2 BY MR. [REDACTED]:

3 Q So is it fair to say that you also cannot say that Republicans who won in  
4 2020, on the same ballot as Joe Biden, were also legitimately elected?

5 A I think it's fair to say, if people want to contest the results of an election  
6 because of potential widespread fraud, that it should be looked into. Every individual,  
7 every candidate, the party committee, we have a right, whether it's Democrats or  
8 Republicans, to look into issues that may have occurred and to challenge them in court.  
9 One hundred percent, absolutely; I don't care if you're a Republican or Democrat.

10 Q Sir, respectfully, please listen to the question I asked you and answer that  
11 question. We don't need to speeches. We don't need political talking points. I asked  
12 you a specific question. If we're going to get out of here in any reasonable time -- you  
13 can make whatever statements you want in public forums. It doesn't help here. The  
14 way the record works here, this is not going to be read in some public forum or where  
15 your public statements will make a difference. It's just going to make us be here longer  
16 today.

17 What I'm asking you -- I want to just delineate whether there are concerns that  
18 the RNC's having that pertain just to Joe Biden and that race or whether those concerns  
19 are broader.

20 So, for example, there are Republicans who were on the same ballot as Joe Biden  
21 in Wisconsin, right? Is that fair?

22 A Sure.

23 Q Okay. Now, I assume that Wisconsin -- is it fair to say that you would have  
24 the position that you cannot say whether Joe Biden legitimately won Wisconsin as a  
25 State? Is that the position that you would have and is consistent with the RNC?

1           A    I am not -- my position is -- I'm not going to go State by State and say  
2 whether Joe Biden legitimately won a State or didn't win a State.

3           My position is that there was so much confusion and potential for fraud across the  
4 country in multiple States that allowed for people to potentially commit fraud, for  
5 safeguards from ballots to be removed, and to create confusion throughout the country  
6 among voters. And, again -- and because of that, it's hard to say if Joe Biden was elected  
7 legitimately or not, just like many Democrats won't say whether President Trump was  
8 elected legitimately or not.

9           And to further answer your question, if you look at Iowa, Miller-Meeks in Iowa,  
10 who only won in 2020 by six votes, Democrats, as a matter of fact, did challenge that.  
11 Nancy Pelosi refused to seat her as a Member of the House of Representatives until the  
12 individual she was running against finally conceded and stepped aside. So I would say  
13 that, yes, Democrats did challenge Republicans who won in 2020 as well.

14          Q    You can say "yes" all you want. That's not what I asked you. My question  
15 I asked you --

16          A    Okay.

17          Q    I mean, you can -- sir, we're trying to get precise points. And you haven't  
18 listened to the question I asked. And if you listen to that question and answer it, we will  
19 move a lot quicker so we can get out of here.

20          What I'm asking you -- I want to understand the RNC's position. And you said  
21 you don't want to go State by State, but I think it's helpful to be specific in what we're  
22 discussing.

23          There are Republicans who won on the ballot under the same processes that Joe  
24 Biden won. So what I'm trying to understand is, do those concerns you have, that have  
25 led you to believe that the President of the United States -- to not have a position -- or to

1 not know whether he was a legitimately elected President, do those also apply to  
2 Republicans who won on the same ballot, where you also cannot know whether they  
3 were legitimately elected? Is --

4 A Yeah.

5 Q -- that accurate?

6 A I think we've seen that from, like, the example I just gave with Miller-Meeks,  
7 where Democrats refused to seat her and refused to acknowledge that she won that race.  
8 And you're right, those were the exact same mechanisms that were used to elect Joe  
9 Biden. So, by the Democrats' own actions, I would say the answer to your question is  
10 yes.

11 Q Again, you're doing your political grandstanding that isn't helping.

12 A You guys --

13 Q Let me finish, sir.

14 A Okay.

15 Q I don't care about what Nancy Pelosi did. This is not the Nancy Pelosi  
16 committee.

17 What we want to understand is to -- what the position as to the fraud, whether  
18 there was fraud that the RNC believed existed in the lead-up to the 6th, the attack on the  
19 Capitol, whether the fraud that was told to the American people, what basis the RNC  
20 thought it had in making the claim that the RNC copywriters did, and the scope as to what  
21 the RNC believed that fraud was, or the environment that led up to that fraud.

22 So I'm asking you, for, as you say, you know, basically the seventh time now,  
23 whether you have a position as to whether you can arrive at the legitimacy of Republicans  
24 that were elected on the same ballot as Joe Biden. Do you believe those Republicans  
25 who were elected in States that Joe Biden won were legitimately elected to their seats in

1 Congress?

2 And I'm asking you, again, about the Republicans, and the party specification is on  
3 purpose. So, please, sir, I don't want to hear about the Democrats. I want to ask you,  
4 as the second in command of the RNC at that point, do you think those individuals were  
5 legitimately elected, those Republicans?

6 A I think that if a Democrat wanted to -- and I appreciate you don't want to  
7 hear about it, but you're going to -- if a Democrat wanted to bring a challenge against  
8 legitimacy of those individuals, they could have.

9 And, as a matter of fact, they did. Again, I'll use the example of Miller-Meeks in  
10 Iowa, who won by six votes, who was not seated in a timely manner when she should've  
11 been until finally her opponent stepped aside.

12 Q So are you suggesting that the RNC's concerns here were for partisan gain  
13 only, or were they about the integrity of the election? Because my understanding, sir --

14 A It's about --

15 Q Let me finish, please. My understanding, sir --

16 A Okay.

17 Q My understanding was that what you were espousing was the position that  
18 the RNC was engaged in these election integrity efforts because it wanted a secure  
19 system, not because it wanted a specific winner. Is that fair?

20 A Absolutely.

21 Q So what you're saying, if I'm correct, is that the security of the system, from  
22 the RNC's perspective, was not a partisan issue; it was an integrity issue as to, we can all  
23 be confident that our election system is secure. Is that fair?

24 A Correct.

25 Q So any concerns that might apply to Joe Biden, in your view, would be

1 equally applicable to Republicans if the circumstances were the same. Is that fair?

2 A I will go back to the example I gave earlier in Pennsylvania, where we  
3 currently have a Republican primary going on, where we have two candidates running for  
4 U.S. Senate, two Republicans candidates running for U.S. Senate, where one of the  
5 candidates is suing to have ballots that arrived or that -- excuse me -- that are not dated,  
6 have those ballots counted in the total.

7 The RNC -- again, two Republicans -- has intervened in that case, because we  
8 believe that is not right and that those ballots should not be counted if they are not  
9 dated, because have you no idea when they arrived.

10 And so that example shows that we are about election integrity and the integrity  
11 of the election for the entire process, regardless if it's Republican or Democrat.

12 Q Okay. So, again -- and, listen, Mr. Walters, here's the beauty of this  
13 process. If you don't want to answer a question, just say it. Just say you don't want to  
14 answer it. Say that the question is not something that you want to weigh in on. Then  
15 we can move on. Right? But --

16 A I feel like I've answered it, multiple times.

17 Q But you haven't. You haven't, sir.

18 A No, it's not the answer you want --

19 Q Again -- wait, wait, wait, wait, wait.

20 [Cross-talk.]

21 A -- haven't answered.

22 Q Wait, wait. I asked you very -- I know we both have been talking over each  
23 other somewhat, but let's try to do better.

24 I'm asking you, again -- I'm not asking you about anything you did yesterday. I  
25 honestly, sir, do not care what the RNC did yesterday. I want to hear about your views

1 as to what happened between November 3rd and January 6th.

2 There were Republicans who were on the same ballots that you now say you can't  
3 be sure led to a legitimate President being elected. And I'm asking you, is it fair to say  
4 that those same concerns regarding legitimacy apply to the Republicans who were on  
5 those same ballots in battleground States that won their election and got seated in the  
6 Congress? Is that fair to say, those concerns also apply to them, yes or no?

7 A I think it is unfair to say what we did yesterday is not applicable here,  
8 because it absolutely is. We intervened in a major Senate race between two  
9 Republicans that could change the outcome of who wins that race regarding an issue of  
10 election integrity. And so that goes to show -- and one of the candidates is not going to  
11 like that. That goes to show how seriously we take the issue of election integrity.

12 And if there were issues regarding the Republicans in 2020 -- Republican ballots in  
13 2020 and Democrats wanted to bring challenges, they absolutely could, like they did in  
14 Iowa with Miller-Meeke, who they refused to seat and sued to try to have her not be the  
15 Congresswoman from that district.

16 Q Well, I guess --

17 Mr. Steggerda. [REDACTED], I would -- can I --

18 Mr. [REDACTED]. Uh-huh?

19 Mr. Steggerda. Can I make a point, just in terms of substance and process?

20 You know, we're really trying to give you broad leeway to ask whatever you want  
21 to ask. When you start to go to non-Presidential races, when you've asked the  
22 question -- and I understand why you ask it. I do believe there's 1 of 600 emails where  
23 there's a reference to Joe Biden's legitimacy. I get it. And I think, for that reason, it's  
24 fair to ask Mr. Walters, do you remember seeing that TMAGAC email?

25 And if I asked you that question, what would your response be?

1           Mr. Walters. I don't recall seeing it.

2           Mr. Steggerda. And then you went further and you asked him, how do you view  
3 the President, whether it's a legitimately elected President or not. He answered it  
4 several times.

5           And, at that point, I think the testimony is on the record as it relates to what we're  
6 talking about, which are the TMAGAC fundraising emails.

7           If you want to go further and assess the depths and the consistency of the  
8 RNC -- he's the chief of staff -- no longer the chief of staff -- the breadth of their  
9 consistently on the position of election integrity as to non-Presidential raises, which don't  
10 relate to the TMAGAC email that I think is the source of all of this line of questioning, I  
11 just think we're going to -- we're just going to -- we're going to go forever. And I just  
12 question the legislative purpose of that line of extended discussion.

13           Mr. [REDACTED]. Well, I will strongly disagree, Todd. It matters, whether  
14 the RNC and their views are genuinely held, based on facts and their understanding of  
15 what happened, or whether they are partisan -- they're motivated by partisan ends.  
16 That matters, Todd. It matters when we look at these emails.

17           And, Todd, it's not one email that calls Joe Biden illegitimate; there are multiple  
18 emails. I've just shown you one, but today I'm happy to show you multiple. There are  
19 emails that go into late December, after the States have certified the results, that still say  
20 Joe Biden is going to be an illegitimate President -- language that Mr. Walters today has  
21 adopted, that Joe Biden is effectively -- he's not a legitimate President. Right?

22           So it is important to understand the intent regarding these statements, so we can  
23 understand why RNC copywriters are writing the things they're writing, and  
24 understanding what the second-in-charge, the person who oversees the digital director,  
25 to understand his thoughts as to the legitimacy of this.

1           And it does matter whether -- if Mr. Walters says, "I only think the legitimacy  
2           question pertains to Joe Biden and Joe Biden alone," well, Todd, it gives us insight into the  
3           intent or perhaps some insight into what the RNC's public statements -- whether they're  
4           genuine or not.

5           And that is all important, both in understanding January 6th and preventing the  
6           next January 6th, by leading people to believe that the elections were stolen from them.  
7           So that's what we're trying to do here, Todd.

8           So, Mr. --

9           Mr. Steggerda. No, I get it, but I would just say one -- I would just respond in one  
10          way.

11          The idea that the RNC copywriters came up with that language -- I think your own  
12          analysis of -- the tweets and the statements that were coming out of the President and  
13          the campaign were largely the source of all of that type of substance that ended up in  
14          these TMAGAC emails.

15          So I don't think the premise of your question, that the RNC copywriters wrote  
16          that -- some of this was cut-and-pasted -- you're well aware of that -- out of the campaign  
17          or the President's feed.

18          Mr. [REDACTED]. You just heard the former chief of staff of the RNC and  
19          now senior advisor make statements, Todd, that are entirely consistent with that  
20          messaging. So I'm sorry, but --

21          Mr. Walters. That's not true. That is not true.

22          BY MR. [REDACTED]:

23          Q    Okay. Well, let's flesh that out, Mr. Walters. Let's flesh that out.

24          You, today -- is it fair to say that you cannot say that Joe Biden was legitimately  
25          elected because you cannot be sure about the amount of fraud that was committed in

1 the 2020 election because of the changes that were made to the electoral process leading  
2 up to the election? Is that a fair statement of your view?

3 A You are asking me what my mindset or process is today, and you're trying to  
4 apply that to what my mindset or thought process may have been in November, or  
5 whatever the month is, of 2020. It's not a fair comparison.

6 And so what I'm saying to you today, regardless of 2020, the emails or whatnot, is  
7 that I believe that the Democrats used COVID to change election laws, to strip away  
8 securities from ballots, to create an atmosphere of confusion, and to allow it to be ripe  
9 for fraud.

10 And what I'm saying is that, because of that, fraud likely occurred. And we'll  
11 never know how much or the extent, because we've talked about the process of  
12 separating ballots from envelopes and never being able to fully understand what  
13 occurred or how it occurred or how much occurred.

14 And what I'm saying -- because of that, I will not say that Joe Biden is the  
15 legitimate President. Just like Democrats didn't say that Donald Trump was the  
16 legitimate President, over and over and over again. Just like they wouldn't seat  
17 Miller-Meeks because they said she wasn't legitimate in her election.

18 So I do believe that Democrats have some of the same concerns in them thinking  
19 that there were issues regarding ballots and ballot integrity. And, like I said, every  
20 political party and every candidate, if they have those concerns, they deserve to go to  
21 court and fight it out in court.

22 And that is my position and my view.

23 Q Two things.

24 The reason I asked you about your view now is because I presume you didn't once  
25 think Joe Biden was the legitimate President and then arrive at your current view. So,

1 knowing your view now, I think it's fair to infer that, whenever you came about it, you  
2 didn't hold the contrary view earlier. Is that fair?

3 A No, that's not fair.

4 Q Okay. So did you --

5 A That's not fair at all.

6 Q -- previously think that Joe Biden was the legitimate President?

7 A My previous view was I did not know, is what my previous view was. That,  
8 during that time, there was so much pending ongoing litigation and that we were trying  
9 to get to the bottom of whatever was going on in court, one way or another, is what my  
10 view was at that time.

11 So I didn't -- so I didn't have a view as to his legitimacy -- and, again, I don't  
12 remember the month, November, December, whichever month you're referencing from  
13 this email. So it's not fair to infer that.

14 Q Wait. Is your -- when you didn't have a view -- that's the view you have  
15 today, that you don't have a view as to -- you cannot say he was not legitimately elected.  
16 Are you drawing a distinction between those two views? Maybe --

17 A What I'm --

18 Q -- I'm misunderstanding here.

19 A So what I'm saying is -- what I'm saying is that, in that time period that  
20 you've referenced, there was a ton of ongoing litigation, and we were involved in that, in  
21 litigation, and trying to get to the bottom of what was going on.

22 A lot was being uncovered at the time. I referenced, in Michigan, where we had  
23 the poll worker, you know, file a whistleblower complaint. We found the ballots that  
24 were found under a table in Georgia -- all different things that were going on that still  
25 needed to be decided.

1           And so my point is, I did not have a view at that time. And so I'm not saying that  
2 Joe Biden is legitimate. I'm not saying Joe Biden's illegitimate. I am saying Joe Biden is  
3 the President of the United States. And on January 20th in 2021 he was sworn in as  
4 President of the United States.

5           Q    So you mentioned the Georgia ballots. Do you know what happened in  
6 that case?

7           A    There were a couple of different instances. Something about ballots being  
8 found under a table. There was so much rhetoric going on in the media from, you know,  
9 the President, from Nancy Pelosi. All over the place, people were saying things. So I  
10 don't -- again, I don't know that we'll ever know what went on.

11          Q    Well, no, but --

12          A    And --

13          Q    -- sir, specifically, the Georgia one. Because you -- I think it's -- you're  
14 saying, we'll never know. I'm asking you -- there is one famous example about the  
15 Georgia suitcases under a table, which is what you're referencing, if I'm not mistaken. I  
16 am asking you -- you just cited it. I am asking you, do you know what happened in that  
17 case?

18          A    I am citing that as an example of confusion. So whatever you're about to  
19 say is the outcome, my point is that there was so much confusion around it, which is why  
20 you have people who don't believe whatever the narrative is on either side.

21          Q    But, sir, you and I are educated people. So, respectfully, the chief of staff  
22 telling me, "We don't know on both sides," I don't buy that. You have the ability and the  
23 resources to get definitive answers.

24                You just cited something here --

25          A    That's not true.

1 Q Well, sir, I can google it right now and tell you what happened in that case.  
2 I'm asking you, do you know --

3 A You --

4 Q Hold on, hold on. Do you know -- do you have any other facts about the  
5 fact -- about the Georgia case that you just cited? Do you have any facts at all?

6 Mr. Walters. Do you want to answer, or do you want me to?

7 Mr. Steggerda. You can answer.

8 Mr. Walters. My point is, whatever you google or whatever you're saying as  
9 facts -- and, again, that's your word, not mine -- we don't know those to be facts.  
10 Because there is so much confusion going on, and people aren't going to trust it. That's  
11 the only point that I'm making.

12 And, like, whatever is reported out very well may be exactly what happened. But  
13 the point I'm making, [REDACTED] is that there was so much confusion in this time period,  
14 whether it's Georgia, Pennsylvania, Wisconsin. That's the only point I'm making, is that  
15 the confusion existed everywhere.

16 BY MR. [REDACTED]:

17 Q Is your answer that you don't know what happened in the Georgia case?

18 A My answer is that confusion existed everywhere.

19 Q Is your -- do you know what happened, yes or no, sir? I mean, I can --

20 A My answer is --

21 Q -- move on. I just want to make sure --

22 A My answer is that confusion existed everywhere.

23 Q Okay. And, specifically, not everywhere, on the Georgia case that you  
24 cited, do you have any -- let me ask you this. Did you, yourself, look into that case  
25 further to see whether anything came out of it?

1           A    I do not recall at the time if I was involved in that, but I know our attorneys  
2    did.

3           Q    Okay.  And without getting into the substance of what they told you, did  
4    you ever ask them for further information as to that case?

5           A    I don't recall.

6           Q    Sitting here today, do you know anything about that case, more than what  
7    you've told me?

8           Mr. Steggerda.  If you remember.

9           Mr. Walters.  I don't really remember much about it.  No.

10          Mr. [REDACTED].  Because you cite confusion, but are you aware that the  
11    Republicans who oversaw the Georgia election released additional footage regarding that  
12    suitcase and indicated that there was no fraud at all and they offered a full explanation of  
13    what occurred?  Have you heard about that?

14          Mr. Walters.  I'm not saying that that didn't happen or that that's not correct.  
15    But my point is, leading up to it and even after it, there's still confusion around it.  You  
16    still have people that don't believe it.  And I'm not saying that's true or not.  But to say  
17    that their confusion doesn't exist I think is completely unfair.

18          Mr. [REDACTED].  I'm not saying --

19          Mr. Steggerda.  [REDACTED], again --

20          Mr. [REDACTED].  I'm not saying confusion doesn't exist.

21          Hold on.  Wait, Todd.  Todd, hold on.

22          I'm not saying confusion doesn't exist, Mr. Walters.  There's confusion about  
23    whether or not the Earth is flat or round.  There's confusion as to whether we go around  
24    the sun or the sun goes around us.  There's confusion as to Big Foot, right?  But people  
25    who have resources and education and intelligence shouldn't hide behind confusion

1 generally. We have the ability to research things, look into facts, draw conclusions.

2 I'm asking you, sir, as the chief of staff of the RNC, you -- former chief of  
3 staff -- you just cited an example of supposed fraud, or confusion regarding fraud. And  
4 I'm asking you whether you ever took the effort or the time to check as to what the  
5 claims actually were before you cited it as an example in a congressional proceeding.  
6 You cited it, sir, not me.

7 And I'm asking you, do you have any facts at all, any knowledge, anything to  
8 explain what happened in that case or what people even allege happened?

9 Mr. Walters. I also know, too, [REDACTED], that we had a Mueller investigation and a  
10 report on Russia that told us that Russian interference didn't change a single vote in the  
11 2016 election. Yet we have prominent Democrat after Democrat say that Donald Trump  
12 is illegitimate because of Russia.

13 And so you can go on and on and on as much as you want about Georgia, and I  
14 understand that I referenced it passingly as a single -- as one of multiple instances that  
15 created confusion throughout the country.

16 But to sit here and say that, you know, all of your examples of how we know  
17 what's true, what's fact, what's not -- then, again, what you said, what videos may be put  
18 out, 100 percent, that could absolutely be the case, absolutely be true, 1,000 percent. It  
19 doesn't change people's perception, in that some people believe that that's still not the  
20 case. Just like we see with Democrats believing that Russia interfered and changed the  
21 election results in 2016, and multiple prominent ones, including the Vice President of the  
22 United States, have said it.

23 Mr. [REDACTED]. Did you ever try to do -- before -- you, as the chief of staff  
24 and an advisor to the chairman of one of the two major parties, did you ever try to  
25 understand factually, from your own resources, from Justin Riemer, from anyone

1 else -- did you want to say, I, Richard Walters, want to know, is this stuff true or not? I  
2 don't mean perception of the general public.

3 Mr. Steggerda. I object to the --

4 Mr. [REDACTED]. And I'm not asking you whether --

5 Mr. Steggerda. -- premise.

6 Mr. [REDACTED]. Yeah?

7 Mr. Steggerda. I object to the premise of the question.

8 You're asking him to come in here and make the case for fraud in this election.  
9 That's not what he said. He's said, now, how many times -- I don't want to read the  
10 transcript, if I ever get to see it, to count how many times he's said it.

11 What he's been trying to say -- I think it's been clear, but it hasn't registered, and I  
12 think you have a different view. What he's tried to say is that, given the lack of  
13 safeguards and the massive amount of mail-in voting, when these ballots come in and  
14 they get separated by people who, frankly, aren't trained in separation or signature  
15 counting and everything else --

16 Mr. [REDACTED]. Todd -- we need his testimony, Todd.

17 Mr. Steggerda. -- once they get separated --

18 Mr. [REDACTED]. Todd, sorry to interrupt, but he didn't say all this. We  
19 need his testimony, right? So we --

20 Mr. Steggerda. That's exactly what he said.

21 Mr. [REDACTED]. Todd, if you want to ask him a question, ask him the  
22 question.

23 Mr. Steggerda. [REDACTED], let me just finish what he said.

24 What he said was, no one -- his view is, no one will ever know, because you can't  
25 go back and figure it out.

1           Now, you're drilling him on, "Well, give me your specific instances of fraud," as if  
2 his entire view is misguided. And all he's been doing is trying to go back and say, "We'll  
3 never know. It was not a properly conducted election." That's what he's been trying  
4 to say.

5           And I know you disagree with it and everything was hunky-dory about this  
6 election, but that's not his view. And, frankly, that's not the view of most of the  
7 Republicans that are on the RNC --

8           Mr. [REDACTED]. Todd, respectfully --

9           Mr. Steggerda. -- you know, email --

10          Mr. [REDACTED]. Todd, respectfully, we don't need your testimony. We're  
11 here for his testimony.

12          And I didn't say -- I didn't offer a view as to the 2020 election. I don't have a  
13 view.

14          And we don't need your testimony, Todd. If you wanted to ask him a question to  
15 clarify mine, I'm happy for you to do that. But, going forward, we don't need your  
16 testimony.

17                       BY MR. [REDACTED]:

18          Q     Mr. Walters, what I'm trying to clarify is that -- you have resources at your  
19 disposal. You are able to check and see whether -- you've gone on, Mr. Walters, nine  
20 times regarding specific examples.

21                So you seem to think that the Meeks example, for example, that it's beneficial for  
22 our discussion to have specific examples as evidence of broader claims. You've done  
23 that multiple times. You've told me about this lawsuit yesterday and put that forward as  
24 an example to help me understand what the RNC's doing.

25                You then referenced an example regarding Georgia, an example that has been

1 talked about ad nauseam in the public, that people at the highest levels of government,  
2 from U.S. attorneys to the Georgia Governor, to the Georgia secretary of state, to Gabriel  
3 Sterling, the election manager in Georgia, have all made public statements about this very  
4 issue.

5 And then you choose to refer to it as an example. And I asked you a simple  
6 followup, to provide me your thoughts as to what actually occurred or what happened,  
7 and you seem unable to even mention a single fact -- which is, itself, telling.

8 So, again, just for the last time, are you aware -- and if you are not, that's okay.  
9 That's okay. You don't need to be aware of everything. I'm not suggesting that. I'm  
10 just asking you, are you aware of any facts as to what anyone alleged occurred on either  
11 side? Are you aware of any of that, or are you not?

12 A [REDACTED], when I talk about Iowa, I, again, referenced that generally and broadly.  
13 I didn't go into the details of that, just as you didn't ask about the details of it. Okay?

14 And when we talk about Georgia, the only point that I'm making is, whether it's  
15 true or not, whatever facts are out or not out, is that people don't agree.

16 And I am saying that as someone who has been on the ground in Georgia talking  
17 to voters, who told me they don't believe what the secretary of state said or they don't  
18 believe the election commissioner, even though the video was put out.

19 So the only point that I'm making, whether it is true or not, is that confusion  
20 exists, through multiple different instances. Whether it's Iowa, Pennsylvania, Wisconsin,  
21 Georgia, the confusion exists, period, the end.

22 Q Did you ever ask anyone to provide any work product to you so you could  
23 have a better understanding about the various fraud claims?

24 A What do you mean by "work product"?

25 Q I'm asking you: There are all these fraud claims going on. We've talked to

1 other people, from the campaign or otherwise, who asked people, "Here, someone made  
2 a claim about the Georgia ballot thing. Go find out what actually happened there."  
3 "Someone made a claim about Dominion Voting Systems. Go find out what happened  
4 there."

5 And I'm asking you, as the chief of staff, did you at any time have any processes or  
6 other efforts -- I'm not asking -- not even getting into substance -- but did you have any  
7 processes or any other efforts to help you understand whether there was, in fact, fraud?  
8 Did you ever ask anyone to do anything, ever task anyone researching it, do anything to  
9 draw a conclusion besides "there's confusion everywhere"?

10 Mr. Steggerda. Objection. Foundation.

11 You can answer.

12 Mr. Walters. I would -- yeah. I mean yes. And I would go back to the example  
13 I've given multiple times in Michigan with the whistleblower who was there, who we  
14 spoke with, who we helped her file an affidavit in the U.S. attorney's office because she  
15 said that she was pressured by her supervisor to count ballots that were undated and  
16 received after election day.

17 So, to answer your question, yes. That is someone who we spoke with, who we  
18 talked to. And that's an instance of the fraud that I've been referencing.

19 Mr. [REDACTED]. Sir, I'm asking you a different question. I'm asking, were  
20 there processes in place?

21 So, for example, did you at some point tell Joe Shmoe, "Hey, I want a memo about  
22 all the claims of fraud in Wisconsin, and let me know either way, whether it's true or  
23 false"?

24 Mr. Steggerda. Don't respond with respect to any of your discussions with the  
25 legal team.

1 Mr. Walters. That's what I was going to -- I mean, my discussions were with  
2 counsel.

3 BY MR. [REDACTED]:

4 Q Okay. So, outside of counsel, you never tasked anyone with researching  
5 fraud claims. Is that fair?

6 A That's fair. But I did discuss it at length with counsel.

7 Q Okay.

8 Do you have -- I'm going to show you what's been marked as government exhibit  
9 4. Now, this is an approval email chain that goes out November 10th.

10 And you'll see at the bottom of page 1 -- do you know who Alex Cannon is, by the  
11 way?

12 A I believe he's an attorney for the Trump organization.

13 Q And that's correct.

14 So he, at the bottom of this email -- is this exhibit 4? Yeah. At the bottom of  
15 this email, it says, "Good with edits below incorporated."

16 And then Kingsley Cortes -- do you know who that is, Kingsley Cortes?

17 A I don't believe so.

18 Q So Kingsley works for the RNC. And Kingsley --

19 A No, she doesn't --

20 Q What?

21 A She doesn't work for the RNC. She has a Donald Trump email address. So  
22 she wouldn't work for the RNC if she has a Donald Trump email --

23 Q You know what? Yeah. I actually apologize. I meant the other way.  
24 You're right, Mr. Walters. I meant to say that the other way.

25 But you see another approval. Then you see Zach Parkinson @ Trump. Do you

1 know who Zach Parkinson is?

2 A Yes, I do.

3 Q And he's the deputy comms director and the head of research for the Trump  
4 campaign, correct?

5 A At that time, I don't know what his title was. But, at that time, I know he  
6 was part of the Trump campaign, but I don't know the title.

7 Q Okay. And then it says, "Otherwise good w/ Justin's edits."

8 And I want to show you, at the bottom, Justin Riemer says, "Suggested edits below  
9 to RNC communication."

10 So this is a TMAGAC email, but, just for clarity, Mr. Riemer is calling it "RNC  
11 communication." Do you see that?

12 A I do. Yes, I do see that.

13 Q Okay.

14 So I'm going to take you to the second page. You see Ms. Trent, who is with the  
15 digital team, sends out this email to [approvals@donaldtrump.com](mailto:approvals@donaldtrump.com) and  
16 [approvals@gop.com](mailto:approvals@gop.com).

17 And [approvals@gop.com](mailto:approvals@gop.com) would've been the email thread that you were on,  
18 correct?

19 A Correct.

20 Q And then on the third page of this document, this is where Mr. Riemer's  
21 edits are that he references here. And you see that the email originally -- and if you  
22 can't tell with the shading, then let me know. But I'm going to read it to you as it was  
23 originally and then the revision.

24 A Okay.

25 Q The original email says, "Joe Biden should not wrongfully claim the office of

1 the President."

2 And then it says, "Joe Biden" -- the new email removes "should not wrongfully  
3 claim the office of the President" and says, "Joe Biden does not get to decide when this  
4 election ends. Only LEGAL ballots must be counted and verified."

5 Do you see that?

6 A I can't see the first part, but I can see the second part.

7 Q Okay. Oh, so that text -- I mean, I have a printed version, Mr. Walters, so  
8 it's easier for me to read.

9 A Okay.

10 Q But the text that's shaded out, it's what's been deleted by Mr. Riemer. And  
11 it says -- he deletes "should not wrongfully claim the office of the President."

12 A Okay.

13 Q So this is November 10th. And from just your reading it -- I assume you  
14 don't recall receiving this email. That's fair, right?

15 A I don't recall, no.

16 Q Okay. Is it fair to say, from just your reading of this, is it a fair  
17 characterization that the edit here is a substantive one?

18 A Will you remind me again of what the shaded part says? Should not what?  
19 I'm sorry.

20 Q "Should not wrongfully claim the office of the President."

21 A Okay. Okay.

22 Q Would you say that Mr. Riemer's edits are substantive here?

23 A Yeah, I mean, he made a -- yes. He made edits, yes.

24 Q And, effectively, he changes the meaning of the copy -- of what the copy's  
25 trying to say. Is that fair?

1           A    I'm not sure I would agree with that.  You'd probably have to ask Justin  
2 what his intent was, but I don't completely agree with that.

3           Q    And tell me why you don't agree.

4           A    So the shaded copy says "should not assume the Presidency"?  I'm sorry.

5           Q    No.  It says "should not wrongfully claim the office of the President."

6           A    Okay.  And so Justin's edit says "does not get to decide when the election  
7 ends."  So that's stating that the election was not over, and so he shouldn't assume the  
8 Presidency until it was over, and that only legal ballots must be counted.

9           Q    Well, I think we would all agree that Joe Biden, himself, does not decide  
10 when the election ends.  I don't think anyone's contesting that.  But is that not  
11 different in kind than saying, Joe Biden should not wrongfully claim that he won the  
12 election?

13          A    I don't -- I mean, again, you would have to ask Justin what his intent was  
14 here with this.  But the way I see it is that Justin was stating that the election wasn't  
15 over and that Joe Biden does not decide what -- I mean, your point is taken on he doesn't  
16 decide -- but it says that Joe Biden does not get to decide when the election ends and  
17 that only legal ballots must be counted and verified.

18          So I read that as:  The election wasn't over, ballots were still being counted and  
19 verified, and, therefore, Joe Biden should not wrongfully take the Presidency.

20          Mr. Steggerda.  Do you remember seeing this email --

21          Mr. Walters.  No, I don't --

22          Mr. Steggerda.  -- at the time.

23          Mr. Walters.  I don't remember seeing this email at the time at all.  I am purely  
24 speculating, based on Tem's request, as to what Justin may have been thinking.

25                   BY MR. [REDACTED]:

1 Q Well, I'm also -- I'm asking just what you think as well, as someone who leads  
2 the RNC, has seen these kind of emails in the past. I'm also asking from your view.

3 So put aside what you think Justin meant. Do you think that is a substantive  
4 change?

5 A I mean, again, I think the tone is probably different. It's a softer tone.  
6 But, as far as substance goes, it seems pretty the same. I mean, the election's not over,  
7 only legal ballots must be counted and verified, which would also mean that Joe Biden  
8 shouldn't assume the Presidency, because the election is not over and ballots are still  
9 being counted and verified.

10 Q Well, where does it say the election is not over?

11 A Well, it says Joe Biden does not get to decide when this election ends,  
12 which --

13 Q Yeah?

14 A So my thought process would be that the election's not over, and only legal  
15 ballots -- and, again, if ballots are still being counted and verified, only legal ballots must  
16 be counted and verified. Then the election's not over.

17 I mean, that is my interpretation of that. I mean, I'm sure other people interpret  
18 it differently, but that is my interpretation of it.

19 Q Well, let me ask you this, sir. Does it say that?

20 A No, it does not say that.

21 Q Okay.

22 I'm going to show you what's been marked as exhibit 5. It's another email chain.  
23 Now we're going -- this is around the same time.

24 Again, we have Alex Cannon at the top of this email. This is a November 11th  
25 email with the subject line, "FOR APPROVAL: Defend the Election & Vaccine."

1 Austin Boedigheimer is responding.

2 Cassie Smedile -- do you know who that is?

3 A Yeah, Cassie Smedile. She was the deputy comms director at the RNC.

4 Q So she says she approves the email.

5 Kingsley Cortes says, "Good!"

6 Mike Reed -- who is Mike Reed?

7 A At the time, he was one of the communications directors, and he's currently  
8 the chief of staff.

9 Q And he says, "Ok."

10 Zach Parkinson says, "Good w/ edits."

11 And then we get to -- Justin Riemer offers edits again, where he says, "A few  
12 suggested edits below."

13 And then Marc Lotter approves for the V.P.

14 So I'm going to bump you ahead in this. This has further comments, but we're  
15 going to go to page 5 to see Justin Riemer's edits.

16 And here the original text says, "Remember, President Trump WON this election  
17 by A LOT. He got 71 MILLION LEGAL votes - the most EVER for a sitting President."

18 Now Justin Riemer removes the language "WON this election by A LOT" and  
19 instead just says, "President Trump got 17 MILLION LEGAL votes."

20 Do you see that?

21 A I see a shaded-out area which I'm assuming is what you're referencing.

22 Q Exactly. So what's shaded are the words "WON" in all caps, "this election,"  
23 and "A LOT" in all caps. And "he" is the word -- maybe that helps.

24 A That helps, yes. Thank you.

25 Q All right.

1           Now, earlier, you mentioned -- is it fair to say that this changes the substantive  
2 meaning of the original copy?

3           A    I do think that changes the meaning of the copy.

4           Q    Because the original copy says the President won the election, and the  
5 second, the new copy, merely notes that he got 71 million votes.  Isn't that right?

6           A    That's correct.

7           Q    Were you ever involved in any conversations within the RNC regarding  
8 messaging about taking a softer tone regarding claims of the President winning the  
9 election?

10          Mr. Steggerda.  If you remember.

11          Mr. Walters.  Not that I recall.

12          I mean, I think if I'm correct -- I saw the date at the top -- this was November 10th.

13

14          I don't really  
15 remember and wasn't really involved in any of this.

16          So there may have been conversations about it with others.  I don't recall being  
17 part of those conversations.

18          BY MR. [REDACTED]:

19          Q    And, just to be clear, for timing purposes, I'm going to show you a variety of  
20 emails, but I'll tell you the time for each one.

21          A    Okay.

22          Q    But I want to understand whether there was any conversations -- when you  
23 got back to work late November, obviously, the President is still challenging the election.

24          A    Right.

25          Q    I want to know whether there was -- so let's expand a bit, zoom out.

1 A Okay.

2 Q Were you involved, at any time prior to January 6th, about the RNC  
3 softening its position or its messaging regarding claiming President Trump won the  
4 election?

5 A I don't necessarily recall being involved in those conversations. But, like  
6 I've said previously, I didn't consider the election over, and so I didn't think that, I mean,  
7 President Trump or President Biden had won yet.

8 I'm not sure what happened to the screen, but -- anyway. Sorry.

9 Q Were there any discussions regarding not publicly saying that President  
10 Trump won the election?

11 A I wasn't involved in any of those discussions, if they occurred.

12 Q Okay.

13 A I don't recall, at least, being involved in any of those discussions, if they  
14 occurred.

15 Q Are you aware of any discussions that you were involved in or that occurred  
16 about pivoting to a focus on election integrity, as we've been using that terminology, as  
17 opposed to claiming that President Trump specifically won? Anything like that happen?

18 A Yeah, I don't recall being involved in a conversation about a specific pivot like  
19 that.

20 Mr. Steggerda. Hey, [REDACTED]?

21 Mr. [REDACTED]. Yeah.

22 Mr. Steggerda. In terms of timing, what are you thinking in terms of how much  
23 more do you have and what do we want to do with a break? What works best for you?  
24 We would certainly like to answer the questions that you have, but the witness has been  
25 going for 3 hours now.

1           Mr. ██████████. Well, Mr. Walters, if you'd like, we could have a lunch  
2 break and come back. Would that be something you'd like?

3           Mr. Steggerda. I know that I told you 12:00 to 2:00 --

4           Mr. Walters. Yeah.

5           Mr. Steggerda. -- and then I had got the time wrong. Are you still --

6           Mr. Walters. I --

7           Mr. Steggerda. Can we get done by 2:00? Could we take a short break and go  
8 another hour and try to wrap it up by 2:00? I mean, how much more do you have?

9           Mr. ██████████. We're going to march through docs. I mean, I think  
10 we -- I don't want to say -- I'm not going to make any promises regarding timing. So I  
11 think, if Mr. Walters wants to grab lunch, we're happy to. We'll take a short break,  
12 come back at 1:00, and then go on and then just see where we are.

13          Mr. Steggerda. Yeah, why don't we take 5 minutes --

14          Mr. ██████████. Okay.

15          Mr. Steggerda. -- and come back and march on? Because I don't want to  
16 reschedule this, but I'm sensitive to Richard's time today. And, you know, we'll plow  
17 through as fast as we can. Does that work for you?

18          Mr. ██████████. Yeah, we're happy to keep going. So let's come back in  
19 5.

20          Mr. Steggerda. Okay.

21          Mr. Walters. Okay.

22          Mr. ██████████. All right. Thank you.

23          [Recess.]

24          Mr. ██████████. Mr. Walters, are you ready to continue?

25          Mr. Walters. Yes, I am.

1 BY MR. [REDACTED]:

2 Q All right. So we were previously on exhibit 5, page 5 of exhibit 5. And you  
3 testified that Mr. Riemer's edits removing that President Trump "WON this election by A  
4 LOT," agreeing that that was a substantive change, correct?

5 A Yes. In my opinion, yeah.

6 Q Are you aware of any issues on November 10th that would be  
7 problematic -- that would make it problematic to say President Trump won the election?

8 A I mean, I kind of go back to what I was saying earlier, that there was ongoing  
9 litigation and, like, ballots were still being counted in multiple States throughout the  
10 country. And, yeah, I mean, couple that with the fact that I had COVID and wasn't  
11 really -- had a very limited knowledge of what was going on in the world at the time, I feel  
12 like.

13 Q Okay.

14 Let's go to -- I'm going to show you another email. This is exhibit 6. And it's a  
15 November -- the original email coming out from the digital team is on November 11th.

16 And Zach Parkinson says he's "good w/ edits."

17 And then Cassie -- how do you say her name again?

18 A "Smeldie."

19 Q "Schmeldie"?

20 A "Smeldie." Yeah.

21 Q "Smelodie." Is that right?

22 A "Smeldie." Close.

23 Q "Smeldie." Got it. "Smel-" -- okay. Thank you. She says, "OK."

24 Mike Reed says, "ok."

25 Mr. Lotter says, "Approved for VP."

1 Kingsley Cortes, on the second page, says, "Good."

2 Alex Cannon says, "Good."

3 And then Jenna Kirsch says, "Edits below." Now, Jenna Kirsch is legal, under  
4 Justin Riemer, correct?

5 A Correct.

6 Q And, then, if you'll -- we'll go to page 3 of this document, where we see  
7 Ms. Kirsch's edits. And you'll see here, Ms. Kirsch, she says, "We'll have what it takes to  
8 keep FIGHTING &," and she removes "secure 4 MORE YEARS" and instead says "defend  
9 the election."

10 Do you see that?

11 A I do.

12 Q And if we go to page 4 of this document, at the second half of page 4, you'll  
13 see another edit from Ms. Kirsch, where, in this draft email, she says -- the original email  
14 asks folks to "contribute to our critical Election Defense Fund so that we can DEFEND the  
15 Election and," and she removes "secure FOUR MORE YEARS" and instead says so that we  
16 can "finish the fight."

17 Do you see that?

18 A I do.

19 Q Is it fair to say that Ms. Kirsch's edits softened the language, by indicating  
20 that donating would secure 4 more years versus finishing the fight?

21 A I mean, my opinion would be that finishing the fight is securing 4 more years.

22 Q So you're saying that her edit was unnecessary and superfluous?

23 A Yeah, I -- I can't tell you why she made the edit, so I don't know what was  
24 going on in her mindset. But I view that as finish the fight -- if you don't mind, let me  
25 just read the rest.

1 Can they zoom out a little bit so I can read the rest of it so I can understand the  
2 context, please?

3 Mr. Steggerda. Just for the record, do you remember this approval chain?

4 Mr. Walters. No. And if I saw the date again, it was November 11th, so I  
5 definitely wasn't engaged at the time.

6 BY MR. [REDACTED]:

7 Q And, Mr. Walters, are you saying -- and I'm asking you, in your, you know,  
8 background, training, and experience, just your views on these edits.

9 A Sure.

10 Q So is it your view that these edits -- that her edits are, in a sense,  
11 unnecessary because those words mean the same thing?

12 A Well, in the first, it says, "I am calling on YOU to ensure we have the  
13 resources to" -- what are those two blurred-out lines? I just need that word.

14 Q So it says, "I am calling on YOU to...have the resources," and she removes  
15 "finish the," and it now says "fight back."

16 A Okay.

17 Q And then in the second half, it says, "I need YOU to step up and contribute to  
18 our critical Election Defense Fund so that we can DEFEND the Election," and the original  
19 language says "and secure" and in all caps "FOUR MORE YEARS," and then it now says in  
20 small caps "finish the fight."

21 So the original says "secure" and then in all caps "FOUR MORE YEARS," but then  
22 Ms. Kirsch says, don't say that, say "finish the fight."

23 And as you --

24 A Yeah --

25 Q And, as you'll note, the previous page, Ms. Kirsch had said, don't say "secure

1 4 MORE YEARS," say "defend the election."

2 So what I'm asking is that -- previously I think you used the language of  
3 "softening." Is it fair to say that this is softer language? Or would you read it  
4 differently?

5 A I think that first edit is probably softer language, but this one seems fairly  
6 interchangeable.

7 And, like, the first line says, "I am calling on YOU to ensure we have the resources  
8 to fight back," matches up with "finish the fight." So it looks like she's trying to make it  
9 flow so it reads as something that makes sense.

10 And this is just my opinion, but, again, I don't know what her mindset was.

11 Q But you've said earlier that Ms. Kirsch's job or legal's job here is to make  
12 revisions that have to do with things that may not be permissible for legal to say. That's  
13 one of their core roles. Is that fair?

14 A No. I think what I said was with regard to litigation, to make sure that if  
15 we're talking about litigation in fundraising, that what they say in these fundraising emails  
16 about litigation is correct, so that -- yeah, so that that's correct.

17 Q Because I think if I'm correct, I think you said two things. One was that the  
18 emails accurately discuss ongoing litigation; and, two, that the fundraising emails don't  
19 say things that aren't legally permissible. Is that what you said?

20 A Probably. I mean, I don't completely recall, but, yes, I guess --

21 Q Yeah.

22 A -- it would make sense that I said that.

23 Q And you wouldn't expect Ms. Kirsch to be -- or maybe you would. Would  
24 she be doing just pure campaign messaging? Or was that the role of Mike Reed, for  
25 example?

1           A    I think you would have to ask Justin what his intent was with her on these  
2 email chains. I don't know.

3           Q    Well, I'm asking you as the chief of staff. What's your understanding as to  
4 what the roles were here? Is your role that Mike Reed was handling comms, for  
5 example, and Ms. Kirsch would've been handling legal questions?

6           A    Yeah, that is my expectation, is that Kirsch would handle legal questions.

7           Q    Okay.

8           A    But, again, if she had a conversation with Mike about messaging or  
9 whatnot -- multiple different things could've gone on that I'm not aware of.

10          Q    But you have no knowledge of that happening.

11          A    Correct. That's correct. I have no knowledge of that happening.

12          Q    So, fair to say you have every reason to think that your expectation would be  
13 intact, that Ms. Kirsch was handling legal questions?

14          A    Correct.

15          Q    So I'm going to show you exhibit 7.

16          A    Okay.

17          Q    And this is the email with the subject line, "FOR APPROVAL: NC, GA  
18 Election Defense."

19                And, again, Ms. Kirsch offers more edits on this email chain. Mr. Cannon, at the  
20 top, adopts her edits. And Ms. Kirsch, at the second email, says, "Edits below."

21                And then you'll see that on page 4 Ms. Kirsch again says similar language, that  
22 instead of "finish the fight," she says -- she removes "secure FOUR MORE YEARS" and says  
23 "finish the fight."

24                Did you have any discussions or are you aware of any discussions as to concerns  
25 about making claims about an additional 4 more years in fundraising solicitations?

1           A    I don't recall being involved in discussions about that.

2           Q    Would you say that this is a substantive change, telling people that if they  
3 contribute, they can "secure FOUR MORE YEARS" versus they can "finish the fight"?

4           A    I really don't think it's that substantive, because "finish the fight" implies  
5 that you're going to get 4 more years. I mean, that's my interpretation.

6           Q    You think if someone lost they couldn't finish the fight and lose at the same  
7 time?

8           A    I'm sorry, can we -- just so I understand the full context, can we zoom out so  
9 I can see --

10          Q    Oh, of course.

11          A    -- the rest of the email?

12                Right. So, "President Trump is calling on his BEST supporters, like YOU, to ensure  
13 we have the resources to finish the fight." And, in my opinion, that means to win  
14 election.

15                And "he needs to YOU step up to contribute to our critical," again, "Election  
16 Defense Fund," so to win the election, "so that we can finish the fight," which, once again,  
17 is consistent with language in the first sentence.

18                So my assumption would be that she changed it to be consistent with the  
19 language in the first sentence.

1

2 [1:15 p.m.]

3 MR. [REDACTED]:

4 Q In your experience, and if you read this, with your training and background,  
5 you would say that Ms. Kirsch was not doing a legal edit; she's over here engaged in  
6 comms editing and messaging editing?

7 A I mean, that would probably be my assumption on this, again, without fully  
8 knowing the back story or --

9 Q Yeah.

10 A This is just in the moment talking to you, that would be my understanding.

11 Q Yeah. So your assumption -- tell me why your assumption wouldn't be that  
12 she's doing the job she's paid for by being a lawyer and providing legal comments.

13 A So, again, if we're assuming, she very well could've had a conversation with  
14 Mike Reed, you know, about the style of it, about how she believes it should be -- should  
15 have been consistent with finish the fight in the first sentence. I mean, there are  
16 multiple reasons. But, again, these are -- you'd have to ask her to know for sure.

17 Q So what I'm asking you, though, is that if someone gives me a document,  
18 if -- if -- when I look at a chain where everyone has very specific skill sets, and we -- and  
19 you said this today, and other people across the RNC and the campaign have told us,  
20 comms, their role is to make sure it's consistent with messaging. Research, check the  
21 facts. Legal, whether you're either doing disclaimers on the fundraising emails are  
22 correct or making sure that we are not saying something we're not legally supposed to  
23 say, that's their role.

24 What you're arguing is speculation. What I'm asking you is that, is it not fair to  
25 assume that when the lawyer provides edits -- and you said the expectation of the lawyer

1 is providing legal edits -- is that fair to assume that the lawyer providing edits is doing so  
2 for legal reasons?

3 A So I'm not trying to -- I don't want to be combative, but on a previous email  
4 where Zach Parkinson is the research director, offered edits to I believe the sentence he  
5 felt was awkward. I mean, that's not research related, that's comms related. And so,  
6 again, I'm not trying to be combative. Like, yes, ultimately, she should provide edits on  
7 legal matters. But if she sees something else, like a stylistic or that she sees something  
8 that's weird, same with Zach, sees something that's weird, something should flow  
9 differently, they're absolutely welcome to make that edit and then the comms director  
10 can veto it if they disagree.

11 Q Well, so I will proffer to you that I think your understanding is incorrect in  
12 that Mr. Parkinson was the deputy comms -- was deputy comms at the campaign. So  
13 you're right in that he's making a comms edit, but that's his title. He is deputy comms  
14 and director of research at the Trump campaign. So you're right, he was making a  
15 comms edit, but that's his role, right. So I think it's consistent with what I'm saying.

16 A No. Well, so my understanding is that the deputy -- my understanding was  
17 he was the deputy communications director for research. Just like at the RNC, he was  
18 the deputy communications director for research. He -- his job is to -- not to get into  
19 minutia, but the research department falls into comms, falls under comms. And so  
20 while he was the deputy communications director for research, Erin Perrine was the  
21 deputy communications director on the campaign for messaging.

22 And so that's -- again, those are very technical things. I understand where you're  
23 coming from, but from, I guess, inside the building, my understanding would be that his  
24 job would be research, not messaging.

25 Q Yeah. And we can agree to disagree, but I'm telling you, in our

1 investigation that, as you can see in these emails, Mr. Parkinson is responding for the  
2 campaign on both the research and the comms perspective here. And that's  
3 consistent --

4 A Okay.

5 Q -- even with the emails I've shown you thus far as to who's -- you see the  
6 campaign legal counsel, you see no comms responding for the campaign, you see  
7 Mr. Parkinson responding.

8 I'm going to show you what's been marked as exhibit -- exhibit -- and I'll proffer to  
9 you again, I wouldn't even show you this one. Exhibit 8, again, has Ms. Kirsch providing  
10 the same edits, and saying that secure -- remove secure 4 more years and instead say that  
11 contribute to election defense fund to finish the fight.

12 And your reading is that finish the fight inherently means win, it does not mean  
13 just get to the end. Is that correct?

14 A Yeah. I -- that's -- I mean, in my personal view, my personal opinion, again,  
15 outside of whatever their thought process was, I almost think that finish the fight is more  
16 aggressive than secure 4 more years. But, you know, I think that, again, it's consistent  
17 with the first line of that -- that sentence. Maybe that's what she was shooting for.

18 Q Did you ever have any discussions with Chairman McDaniel about softening  
19 public statements regarding claims that the election was stolen?

20 A No, not that I recall. I also don't recall Chairman McDaniel making public  
21 statements saying the election was stolen. And if she did, I just don't recall it.

22 Q Did Ms. McDaniel have the view, from your understanding, that the election  
23 was stolen from President Trump?

24 A I think that the chairwoman and I shared the same view that there were a  
25 bunch of election irregularities and a bunch of changes to the election because of COVID

1 and that, you know, we will never know.

2 Q So is it your understanding from your conversations with her that she also  
3 would have the view that she cannot know whether Joe Biden is a legitimate President?

4 A I mean, I don't want to speak on her behalf, but I assume you guys will ask  
5 her that yourself, but sure. I mean -- but, again, I think you should get clarity from her.

6 Q No. I'm asking what you understand from your conversations you had with  
7 her. Is it your understanding that she believes Joe Biden is -- that she does not know  
8 whether Joe Biden is a legitimate President?

9 A I don't recall a conversation where the chairwoman has ever said that Joe  
10 Biden is a legitimate President or an illegitimate President.

11 Q Do you have an understanding from speaking with her as to whether she has  
12 a view?

13 A I don't -- I don't. I mean, my understanding from speaking with her is  
14 that -- that Democrats used COVID as a way to strip ballot security and create confusion,  
15 again, whether they meant to or not, and really -- it really caused problems in this  
16 election. I mean, that's -- I know we -- I know we share that view.

17 Q Now -- and I don't want to talk about this too much, but you mentioned  
18 multiple times, and I want to just clear the record so I know what you're saying, because I  
19 don't want to misunderstand you. You just said Democrats stripped ballot security.  
20 Are you suggest -- are you indicating that you believe it was their intent or was a  
21 by-product of changes made?

22 A I think that their intent during COVID was to remove things, such as the  
23 signature match, signature veri- -- like signature verification, to remove voter ID, to  
24 remove ballot signatures being required, to not purge voter rolls. I mean, that was  
25 clearly their intent because they didn't do it.

1 Q But my point is that, was the intent to be that people who were not allowed  
2 to vote would vote, like, there would be unlawful voting?

3 A Look, I -- I'm not going to speculate on whether the -- if the  
4 Democrat -- Democrats broadly, you know, tried to encourage unlawful voting. I don't  
5 want to say -- I don't believe that. But I do think that they created an atmosphere for it  
6 to occur.

7 Q What I'm trying to parse out -- so just to be clear, you're saying that you  
8 don't -- you don't have a view as to the intent, but the atmosphere was the by-product of  
9 whatever the intent was. Is that fair?

10 A No. I'm saying the by-product was -- it became -- the atmosphere was a  
11 by-product of their action. And, again, I don't know the intent, but we know the action.  
12 And the by-product was because of -- was from their actions.

13 Q Do you recall comments that Ms. McDaniel made publicly that, I think the  
14 quote is, quote, painfully, Joe Biden won the election and it's very painful to watch. He's  
15 the President, we know that.

16 And that's from late November. It got a lot of press, because I think there was  
17 some backlash and she may have deleted some comments after the fact. But -- and she  
18 indicates as well that she said that were lots of problems with the processes, but that she  
19 says her conclusion is, painfully, Joe Biden won the election.

20 First of all, before we get into whether you had conversations with her about that,  
21 do you recall the comments I'm talking about?

22 A Well, to clarify, you said November, November of what year?

23 Q November of -- this article is 20 -- it's 2020 I believe she said it. It's during  
24 the period. But, I mean, are you suggesting it was 2021?

25 A Yeah, I believe it was November of 2021. So a year after that.

1 Q Okay. So -- but do you recall the comments I'm talking about?

2 A I do, from November of 2021.

3 Q Okay. So 2021. Okay. I appreciate that.

4 Did you have conversations with her about those comments?

5 A Like, after the fact?

6 Q Yes.

7 A Sure, yes. Yes.

8 Q And tell me about those conversations.

9 A Our counsel was present, so I'm not sure that I should, but --

10 Q Did you have conversations with her when the counsel wasn't present about  
11 these comments?

12 A I don't recall having conversations with her without counsel present.

13 Q So have you ever talked to her about whether Joe Biden won the election  
14 without counsel present?

15 A I don't recall a specific instance of it. I'm not saying it didn't happen. I  
16 just -- we have -- we talk a lot. I just don't recall a specific instance.

17 Q Okay. So then, recall a general instance. Are you generally aware of her  
18 views as to whether Joe Biden in fact won the election and not a fraud? Because it looks  
19 like her comments are saying that, with the benefit of having a year later, right. So  
20 we've talked about -- we could talk about the fog of war, but a year later, in November  
21 2021, Ms. McDaniel says, painfully, Joe Biden won the election. And she even notes,  
22 perhaps there were issues with the process, but Joe Biden won. Right?

23 A Yeah.

24 Q Is that a fair description of her view in November 2021?

25 A Yeah. It's a public on record view, then sure, absolutely. That's what she

1 said.

2 Q All right. And are you saying that you don't recall any discussions with her  
3 about her views about whether Joe Biden won the Presidency in the last year and a half --

4 A No. What I'm saying is I don't recall.

5 Q -- when counsel wasn't present?

6 A Correct. Without counsel present.

7 Q But you remember the conversations where counsel was present?

8 A I do recall conversations where counsel was present.

9 Q And you remember the substance of those conversations where counsel was  
10 present. Is that right?

11 A Some of them, but not -- I mean, I don't remember the substance of every  
12 conversation. But, generally, sure.

13 Q So do you know why Ms. McDaniel, after the benefit of a year of reviewing  
14 the claims, RNC litigation, the advice of counsel of you and others, how she reached a  
15 conclusion that Joe Biden did in fact win the election?

16 A Yeah. Because she was in -- he was in the White House. He was the  
17 President.

18 Q Well, sir, that's not what Ms. McDaniel said. So -- right? Based on what  
19 you said today, and tell me if I'm wrong, one can both be inaugurated as President but  
20 perhaps be an illegitimate President. We may not know the answer, but that's a  
21 possible conclusion, right?

22 A No. I actually never not once said that Joe Biden was an illegitimate  
23 President, ever.

24 Q Sir, please, you have got to listen to what I'm saying specifically. I didn't say  
25 you said that. I didn't say you said that. What I said -- no, no, no. What I said

1 specifically, you said you don't know whether Joe Biden is an illegitimate President or not.

2 Correct?

3 A No, I didn't. I said that I don't know if Joe Biden is a legitimate President.

4 Q Okay. You don't know whether he's a legitimate President, which means  
5 you don't know whether he's illegitimate as well. This is linguistics here. I mean, this  
6 shouldn't be complicated.

7 A I just want to make sure we're accurate. Sorry, [REDACTED]

8 Q Apology accepted.

9 Let's be clear. In the last year, a legitimacy question, have you had any  
10 discussion with Ms. McDaniel as to how she arrived at the conclusion that Joe Biden won  
11 the election, despite any claims regarding the processes?

12 A Outside of the presence of counsel, I do not recall.

13 Q Did you -- well, you say you don't recall. So all the conversations you do  
14 recall happened to be when the lawyers were there. The ones the lawyers weren't  
15 there, you don't recall. Is that accurate?

16 A What I'm saying is I don't know if there were conversations. I don't recall a  
17 conversation. There may have been, there may not have been. I don't remember a  
18 time where we had a conversation about Joe Biden being the President. I mean, I -- I  
19 remember this interview. And there was prep for this interview. And during that prep,  
20 our counsel was present. That is a conversation I remember.

21 Q And he was providing legal advice?

22 A He was.

23 Q And is your view -- is there any difference in your view that you've espoused  
24 here today than the view Ms. McDaniel said in that interview? Is there any difference?

25 A That Joe Biden is the President?

1 Q That's not what she's saying. We have to be precise with our language.

2 Of course he's the President. She said --

3 A [Inaudible.]

4 Q Yes. I've read the quote. The quote is --

5 Mr. Steggerda. [REDACTED]

6 [Reporter asks for clarification.]

7 Mr. Steggerda. This is Todd Steggerda of McGuireWoods.

8 What's confusing us, [REDACTED] -- and maybe you can just restate the question in a way

9 so there's no confusion about it. I don't have the quote from McDaniel in front of us.

10 You have told the witness that, on the one hand, the chair said in this quote, Biden won

11 the Presidency. But then you also suggested she also talked about the process violations

12 and her concerns about that.

13 If we could see what she said so that then the witness can be asked about

14 whether that's consistent with his view or not, I think maybe that will help get us to the

15 finish line.

16 BY MR. [REDACTED]:

17 Q Mr. Walter, the thing I'm parsing between is the idea of Joe Biden being the

18 President versus Joe Biden winning the election. Do you see what I mean by the

19 difference there?

20 A I -- I understand the difference.

21 Q All right.

22 A I understand what you're saying.

23 Q Okay. So someone can win an election and then, for whatever reason, not

24 be inaugurated as President. And the vice versa could theoretically happen, someone

25 could not win an election but, nonetheless, be inaugurated as President. Is that fair?

1 A I think. Sure.

2 Q In the abstract?

3 A Yeah.

4 Q Ms. McDaniel says, painfully, Joe Biden won the election and it's very painful  
5 to watch. He's the President, we know that.

6 Now, when she says, Joe Biden won the election, is that different from the view  
7 you've espoused today about -- and I'm not asking whether he is the President. I'm  
8 asking as to whether Joe Biden won the election?

9 A I don't think that's different --

10 Q Okay. So your view is that --

11 A -- than what I said.

12 Q Okay. So your view is that -- obviously, Joe Biden is President. Your view  
13 is that Joe Biden won the election?

14 A Correct.

15 Q Okay. And your view is that you just don't know whether he won through  
16 fraud or not?

17 A That -- yes. That -- and we will never know.

18 Q And is your view that that's -- from your conversation with Ms. McDaniel,  
19 that your view is that she also was saying the same thing that you were saying, that, yes,  
20 he may have won, but it might have been fraud where he in fact should not be President  
21 because he's illegitimate, from your conversations with her?

22 A No. [REDACTED], no one -- I have not once said that he was illegitimate. I have  
23 not once said he shouldn't be President. You're putting words in my mouth.

24 Q I said could be, sir.

25 A Please don't interrupt me. With all due respect, you're putting words in my

1 mouth, number one. And number two, you're asking me to respond to something that I  
2 haven't seen, I don't have a copy of, and I don't have the full context.

3 What I am willing to say is that -- I'm going to take you at your word that Ronna  
4 made that comment, that Joe Biden won the President, here's our President. And what  
5 I'm willing to say is that I agree with that, Joe Biden won the Presidency, is the President.

6 What I will also say is that there was, again, an atmosphere where fraud was able  
7 to exist because of Democrat overreach and Democrats stripping safeguards from ballots.  
8 And I believe that because of that, we'll never know the true legitimacy of it. And that  
9 doesn't mean he shouldn't be President, doesn't mean he should be President. That is  
10 just -- that's my view. And if -- you'll need to ask Ronna if she shares the same view.

11 Q I appreciate that Mr. Walters.

12 When you say -- and this is just a very quick side note, but when you say that the  
13 changes made in terms of COVID, I mean, you multiple times today talked about [REDACTED]  
14 [REDACTED] In our last  
15 interview, you said you were, [REDACTED] whatnot.

16 Does that impact your view as to whether or not changes should have been made  
17 in light of the medical needs of COVID or no?

18 A Absolutely not.

19 Q Okay. So even with your experience, your view is that COVID was not a  
20 sufficient basis to make changes? Is that a fair calculation? I want to be fair here.

21 A Sure. No, that's fair. I do believe that some changes could've been made,  
22 but I don't think that not purging the voter rolls or automatically mailing ballots to  
23 everyone on a voter roll is -- should be come about because of COVID. I don't think one  
24 has anything to do with the other.

25 Q What States automatically mailed --

1 A California.

2 Q Okay. And was California dispositive in who won the election?

3 A It was -- it was -- it was dispositive in who had -- takes back the House and all  
4 the House seats we won. So it was very much so important to us.

5 Q Okay. But I'm asking you about the Presidency.

6 A Correct --

7 Q You still have the claim, I'm asking you -- I'm sorry?

8 A The other State was Nevada.

9 Q Okay. What I'm trying to understand, sir, is the claims you're making about  
10 what was dispositive for the election and what was not. You threw up California.  
11 California was going to go to Democrat no matter what, isn't that fair, on the Presidential  
12 level?

13 A For the Presidential level, that's fair.

14 Q Okay. So that example as a COVID change is not a great one then for the  
15 claims made in the TMAGAC emails. Is that fair?

16 A Okay. Sure.

17 Q Okay. So what other examples do you have in mind that you cite?

18 A Nevada.

19 Q Okay. And what did --

20 A Not purging its rolls, battleground State for sure.

21 Q Okay. So tell me what Nevada did that was inappropriate, in your view.

22 A Not purging -- not purging the voter rolls, automatically sending out  
23 voter -- excuse me, absentee ballot requests to everyone on the voter rolls. Like, I  
24 just -- I don't believe that those should have happened -- those things should have  
25 happened. You had -- not to mention, all of the polling locations that were closed

1 throughout -- through multiple States. I think you look at a State like Florida who was  
2 able to execute the 2020 election with no real issues versus some of these other States  
3 that changed their laws, that had real -- in my opinion, real consequences and were real  
4 problems.

5 I think Wisconsin is also one of those States. Pennsylvania is one of those States.  
6 I mean --

7 Q And in your view with that is -- but to be clear, the RNC has not somehow  
8 found any dispositive evidence of fraud to this day. Is that your understanding?

9 A By dispositive do you mean -- what?

10 Q I'm saying, sir, the -- there's a lot of -- the emails that we've been talking  
11 about of course claim the Democrats are trying to steal the election, again and again and  
12 again. The emails say multiple times that Joe Biden is going to be the illegitimate  
13 President.

14 We are now on May 25th of 2022. Have you become aware of any fraud, not an  
15 atmosphere of fraud, actual fraud? And I know you say that we can never know,  
16 but -- and if that's your answer, then you can say it. But are you aware of any evidence  
17 with all the money you said the RNC has spent, the efforts of the Trump campaign,  
18 Republicans like in Georgia who oversee the process, are you aware of any fraud that  
19 would have been dispositive in the election?

20 A So like I've already referenced, the instance in Michigan where you had the  
21 poll worker who was pressured by her boss to count ballots after election day or count  
22 ballots that came in after election day or weren't dated, who filed a whistleblower  
23 complaint. You have the sheriff in Wisconsin who stated that there were irregularities  
24 that went on in the -- in his county in the election there.

25 So, yeah, I am I aware of instances today that -- that were problematic. And I

1 know you don't -- the -- I've said this before, but we will never know to what extent.  
2 And so it's hard to say one way or another, sitting here today, if it would have changed  
3 the outcome, because we just don't know.

4 Q So the examples you have after a year and a half is an affidavit from a  
5 woman saying she was pressured. Is that your best example?

6 A No. I gave you the example of Wisconsin, with the sheriff there. If you  
7 have -- you can google it, I'm sure, like you did Ronna's other story. You can talk about  
8 Pennsylvania where we had the issue with undated ballots being counted. Again, the  
9 same issue we're fighting today that the RNC's involved in litigation there. I mean, there  
10 were multiple issues, and I'm sure we can have counsel provide it to you guys, if you  
11 would like.

12 Q You'd be happy to provide evidence of dispositive voter fraud?

13 A Happy to provide evidence that the instances I'm referring to -- again, do you  
14 want a definitive answer as to whether or not it would change the outcome? And what I  
15 will tell you again is that we will never know for sure.

16 Q I'm going to show you an email, what's exhibit 11. And we are skipping  
17 documents, Mr. Walters. It may not seem that way, but we're going to move faster.

18 Mr. Steggerda. What's the date of this one, Tem?

19 Mr. [REDACTED]. It's November 20th.

20 Mr. Steggerda. Were you still under the throes of COVID --

21 Mr. Walters. Yeah.

22 Mr. Steggerda. -- on November 20th?

23 Mr. Walters. I think so.

24 BY MR. [REDACTED]:

25 Q So let's look at this email quickly, Mr. Walters. Again, Mr. Cannon said he's

1 good with edits. Mike Reed says okay. The email is November 20th. It has press  
2 conference and election defense as the subject line.

3 Mr. Robertson from legal offers an edit where he says, We have hundreds of  
4 thousands of affidavits. He now says "we have hundreds." He just makes that edit.

5 I'm going point you towards, on the second page, Jenna Kirsch says she has edits,  
6 in the middle. And then she changes the edit here where she removes "The radical left  
7 allowed illegal ballots to spoil our election." And she said, "The radical left don't want us  
8 to investigate."

9 And I'm going to hop ahead to page -- give me one second, sir -- to page 4 and  
10 additional edits here. You'll see that it goes -- there are edits from "voter fraud" to  
11 "voting irregularities." And then there's a -- you see that where it begins with Rudy  
12 Giuliani?

13 A I do.

14 Q Okay. So the initial sentence says, Rudy Giuliani and the Trump campaign  
15 legal team have reportedly uncovered mass amounts of edits, which is from "voter fraud"  
16 to "voting irregularities." Do you see that?

17 A I do.

18 Q In your reading of that, is that a substantive change saying voter fraud  
19 versus -- is it softer to say irregularities?

20 A I think it's a substantive change, yes. I agree with you.

21 Q Okay. And the next line, the previous sentence says, One thing has become  
22 very clear, Joe Biden did not win the election and the fake news media is continuing to  
23 ignore the biggest political scam of all time.

24 And legal makes the edit that Joe Biden did not win this election. Again, here fair  
25 to say that removing the Joe Biden did not win the election is a substantive change?

1 A It is substantive change.

2 Q Now, you never saw this email, as far as you can recall, right?

3 A As far as I recall, no.

4 Q And on the next page, we have an edit where, at the top of page 5 of exhibit  
5 11, Ms. Kirsch seems to change the edit from "he did not win this election" to "he hasn't  
6 won this election." Is it fair to say that that's, again, softening the language of the claims  
7 made in the email?

8 A It says basically the same to me. I don't think that that's that much of a  
9 substantive change.

10 Q Okay. So you think -- so he did not win and he hasn't won are the same to  
11 you?

12 A Yeah. I mean, he had -- he did not win the election. Votes were still being  
13 counted, litigation was still going on. He hadn't won, he did not win. And this is saying  
14 it's like he hasn't won because votes are still being counted and litigation is still  
15 happening.

16 I don't -- I mean, I understand it's a change; I just don't think it's that the  
17 substantive.

18 Q Sir, in your view, at what point did President Biden win the election?

19 A When he was sworn in on January 20th.

20 Q Not after January 6th, the certification that happened in Congress?

21 A I believe that we still had litigation going on at that time. And so -- look,  
22 were things looking bleak? Sure, absolutely. But we have a responsibility to the 75  
23 million Republicans who voted for Donald Trump to see litigation through. And until  
24 January 20th when he took the oath of office and was sworn in, that's what we were  
25 doing.

1           Q    I guess what I'm asking, though, just to be clear, when you say he  
2 didn't -- when he won the election, the President can win the election with ongoing  
3 litigation still outstanding, correct?

4           A    Okay.  Sure.

5           Q    I'm saying is that -- do you agree with that view?  So when you say that --

6           A    Yes.  Yeah.

7           Q    Oh, I'm sorry, did you say no or yes?

8           A    No, I said yes.

9           Q    Okay.  So the fact that litigation was pending doesn't mean he didn't win  
10 the election.  So I'm asking you, what's the view when you said he -- when he would've  
11 won the election?

12          A    I think on January 20th when he took the oath of office.  I mean, the  
13 pending liti- -- look, I understand what you're saying and that there could be a lawsuit or  
14 two after election day, which we saw in, quite frankly, in 2016, when we did the recount  
15 in Michigan because they didn't think that Trump won that State and the Clinton  
16 campaign pushed for the recount there.  And so, ultimately, though, that State would  
17 not have changed the outcome of the election.  I think the way the view here from our  
18 team was that if there were enough litigation going on in those States to change the  
19 outcome of the election, then neither candidate had won yet.

20          Q    I'm going to hop ahead to exhibit 14, which is one of the emails we've been  
21 talking about.  So the States certify on December 14th, and then this email here I'm  
22 going to show you is December 22nd.  And I am going to point you towards the official  
23 poll here where it says, Do you want our country to be run by Joe Biden, who would be an  
24 illegitimate President?

25                Have you ever seen this poll before?

1 A During this time period, I had not.

2 Q Okay.

3 A I don't recall seeing it during this time period.

4 Q Okay. Do you remember discussions in December 20 -- in late December  
5 about claims about Joe Biden would be an illegitimate President?

6 A I don't recall those claims. To be quite honest with you, at that point, I was  
7 so focused on Georgia and, really, that was my sole focus. We were in the process of  
8 moving 600 staff down, opening up offices, making sure that they were all taken care of  
9 to win those two Senate races that were on January 5th. And that's really where I  
10 focused this time in December.

11 Q Would you agree that the statement made here about the illegitimacy is  
12 different in kind than what you were saying earlier regarding a lack of knowledge as to  
13 the legitimacy?

14 A Probably, yes.

15 Q Okay. So in December 22nd of 2020, are you aware of any facts that  
16 led -- that would lead one to conclude that Joe Biden would be an illegitimate President?

17 A So I just -- can I see the rest of the email? Because just showing just a  
18 snippet in a vacuum it's not fair. I need the whole context to understand.

19 Q Yeah, for sure. That's not a problem at all.

20 Tell us when you've read the whole thing.

21 A Okay. Okay.

22 Q All right. So --

23 Mr. Steggerda. Could you go down and just verify this is a TMAGAC fundraising  
24 email?

25 Mr. [REDACTED]. Well, I have to say, I don't know if this printout has it, but

1 we'll see. Because we -- from different sources, Todd.

2 Mr. Steggerda. Just from a foundation perspective, though, Tem.

3 Mr. [REDACTED] Yeah.

4 Mr. Steggerda. Richard, do you remember seeing that or approving that back in  
5 December 2020?

6 Mr. Walters. No.

7 Mr. Steggerda. Do you have a recollection of any --

8 Mr. Walters. I don't. I don't. And also, I wouldn't -- I mean, it says Team  
9 Trump. If this was a campaign email, I wouldn't have been on the approval chain, not  
10 that -- even if I was on the approval chain, that I would have seen it anyway. But I  
11 don't -- is this definitely a TMAGAC email?

12 BY MR. [REDACTED]:

13 Q I mean, I think as you saw earlier, Mr. Walters, and we showed you exhibits  
14 21 and 22, exhibit 22 was for Team Trump and that was a TMAGAC email. So the  
15 TMAGAC emails, the signers can be from President Trump, from surrogates, from Team  
16 Trump.

17 A Right.

18 Q We haven't seen a member from the RNC, so it's always linked to a President  
19 Trump framing, as far as I recall.

20 A So you're confident then that this is a TMAGAC email?

21 Q I am. We're happy to pull it up again in another source so we can see the  
22 full thing, if that's helpful.

23 A No, I'm just curious.

24 Q Yeah.

25 A Because, like I said, if -- if it is a Donald J. Trump email, I would not have seen

1 it or been part of it.

2 Q Yeah. So my question for you, though, is that, is it fair to say that this  
3 is -- would you -- is it fair to characterize this as a claim that Joe Biden is going to be an  
4 illegitimate President if he in fact becomes President?

5 A Is it fair --

6 Q In that poll there. In that poll -- what goes in that poll, would you agree  
7 that that states that Joe Biden is going to be an illegitimate President if he does become  
8 President?

9 A That's what the poll states, yes. Yeah.

10 Is that what he's asking me?

11 Mr. Steggerda. Yes.

12 Mr. Walters. Okay.

13 Mr. [REDACTED]. Yeah. And that's different from the view that you've  
14 then espoused and currently espouse. Is that fair?

15 Mr. Walters. Cor- -- I mean, my view is I don't know the legitimacy and we'll  
16 never know, is what my view is.

17 Mr. [REDACTED]. Are you now or have you ever been aware of facts that  
18 would support saying that Joe Biden would be or is an illegitimate President?

19 Mr. Walters. As I've said multiple times, I -- the Democrats used COVID as a way  
20 to change election laws and as a way to remove safeguards from ballots and safeguards  
21 from the election process. We saw it all throughout the country. And because of that,  
22 we'll never actually know. We'll never be able to know if -- the amount of fraud that  
23 occurred in the election.

24 Mr. Steggerda. Do you know what the source was of that comment about  
25 illegitimate President?

1 Mr. Walters. I have no idea.

2 BY MR. [REDACTED]:

3 Q I'm to going switch topics a bit and talk about -- you can take the document  
4 down, please -- and talk about Salesforce.

5 Are you aware that Salesforce provided services to the RNC, including delivering  
6 emails for TMAGAC?

7 A Yep, I am aware of that.

8 Q And were you aware of that in November 2020 through January 6th?

9 A Yeah. I -- I mean, I was aware they were a vendor. I'm not sure I was  
10 aware of exactly what they did. But, yes, I was aware they were a vendor.

11 Q Okay. In any time prior to January -- well, in any period, no time limitation,  
12 are you aware of any complaints -- did Salesforce make you or the RNC aware of any  
13 complaint it had received regarding emails sent through its platform by the RNC?

14 A By the RNC or by TMAGAC?

15 Q My understanding is that the RNC's account is used by RNC individuals on  
16 behalf of TMAGAC, so I mean all the same thing. It's all the same account as what I  
17 understand. If you have a different understanding, let me know.

18 A Yeah, I think that's incorrect. They're separate accounts.

19 Q Okay. Well, tell me about, are you aware of complaints that came related  
20 to the RNC or to TMAGAC?

21 A I am aware of the TMAGAC complaints immediately following January 6th,  
22 and they weren't allowed to send any longer. The TMAGAC wasn't. But -- and the  
23 reason why I say they're different accounts because the RNC was allowed to send. I  
24 assume that they were the same account, but it would be neither one of us would have  
25 been. But I guess I potentially could be wrong on that, but I'm pretty sure they're two

1 separate accounts.

2 Q And how did you become aware about the complaints or the issues  
3 regarding the TMAGAC sends?

4 A From -- if I recall -- if I'm recalling correctly, it's from Kevin Zambrano.

5 Q And what did Kevin tell you?

6 A That they had an issue with the email send -- that -- or that they -- the -- the  
7 email sends could no longer go out from TMAGAC because of January 6th. And so  
8 TMAGAC didn't send anything. And the RNC actually, from what I recall, didn't send  
9 emails for a couple of days as well.

10 Q So are you saying that the Salesforce had barred TMAGAC emails from going  
11 out?

12 A Again, I believe that's what happened. I would -- I -- I think that is what  
13 happened, that they sent -- they barred them from sending emails out.

14 Q And what did you do, if anything, in response to learning about that from  
15 Kevin Zambrano?

16 A I'm not sure I did anything. I don't recall doing anything. I said okay. I  
17 mean, I'm not sure -- I mean, TMAGAC was deplatformed by Salesforce. I'm not sure  
18 there was much we could do.

19 Q How do you understand them to be deplatformed by Salesforce? Who told  
20 you that?

21 A Well, because it wouldn't let them send emails. Like, Kevin told me they  
22 couldn't send emails, which then, to me, means they were deplatformed.

23 Q So was there -- did you raise that with the chair -- the chairwoman? Did  
24 you do anything else? Did you just kind of say it is what it is? Well, did you say like --

25 A I'm sorry. Go ahead.

1 Q Did you go back to ask, like, why they were deplatformed, why that'd even  
2 make sense?

3 A I don't recall pushing back, but I do know the chair was aware of it. It was  
4 very public. It was -- I think Salesforce, if I remember correctly, Salesforce put out a  
5 statement saying they did so. So, I mean, it was publicly known that it happened.

6 Q Did you have any discussions with -- internally regarding what Salesforce said  
7 it was doing in stopping those emails from going out?

8 A I don't recall specific conversations.

9 Q Because I'm going to show you what's been marked as Government Exhibit  
10 19, which is some of the report -- the reporting that happens regarding that time.

11 A Okay.

12 Q And this is an article here from CBS. But just to give you some sense, in the  
13 third paragraph, it indicates the statement from the RNC that came out January 11th.  
14 And there are a few -- excuse me, from Salesforce. And Salesforce says, We are all  
15 deeply troubled by the terrible events of January 6th. And while we all hope that they  
16 are never repeated, sadly there remains a risk of politically incited violence across the  
17 country. The Republican National Committee has been a long-standing customer,  
18 predating the current administration, and we have taken actions to prevent the use of  
19 services in any way that could lead to violence.

20 So when I read that, it seems to draw a connection between emails that the RNC  
21 folks are writing and political violence.

22 Did you read this statement at the time that it came out? Were you aware of it?

23 A I was probably aware of it. I don't recall the statement or reading it. But  
24 seeing it now, I don't -- I actually -- I don't agree with your assessment of it. I think that  
25 the comment, "we have taken action to prevent its use of our services in any way that

1 could lead to violence," that's been a long-standing policy that we don't -- you know, that  
2 the RNC wouldn't do anything that led to violence.

3 I mean, if you keep reading, it says the RNC independently decided to stop  
4 fundraising. So meaning that Salesforce didn't force us to stop fundraising, we  
5 independently decided to do it.

6 Q To be clear, Salesforce is saying here it took action to prevent use of its  
7 services in any way that could lead to violence. You agree that's what it says, right?

8 A No. I thought you said this is RNC's statement. I'm perhaps confused.  
9 Sorry.

10 Q No. Sorry. No. This is a Salesforce quote. This is what the Salesforce is  
11 saying about the action it took. So I'll let you reread it again.

12 A Okay.

13 Okay. Right.

14 Q All right. So that's Salesforce telling the public in the aftermath of January  
15 6th. So does that help reframe you a bit?

16 A Yeah. I still -- I don't necessarily remember it, but, yes, I'm understanding  
17 now.

18 Q Do you recall in having any discussions as to what the RNC should do in  
19 response to this statement?

20 A I mean, I -- again, I don't think we had to respond because we independently  
21 stopped fundraising. And they didn't -- they didn't make us stop fundraising, we chose  
22 to.

23 Q You did use a term that TMAGAC was deplatformed, correct?

24 A Right.

25 Q And here, Salesforce publicly says its connecting January 6th and the use of

1 the RNC -- the RNC's use of its services, and connecting all of that in something that could  
2 lead to violence. Is that a fair reading of what this -- not saying it's true. I'm saying, is  
3 that a fair reading of what the Salesforce statement says?

4 A Yes. That -- yeah, that we have taken action to prevent its use of our  
5 services in any way that could lead to violence, yes.

6 Q So separate from what the RNC did separately, which we know there was a  
7 pause to fundraising, did you not have any discussions with anyone, whether the  
8 chairwoman or anyone else, as to this very public statement by a massive company  
9 connecting January 6th, TMAGAC fundraising emails, and violence?

10 A No, because they didn't -- whatever action they're saying they took -- or  
11 to -- action to prevent use of our services, whatever they did didn't impact us because we  
12 weren't using the services that could -- in a way that could lead to violence. So I get  
13 what they had to say, but I think they made a very political statement in a very politically  
14 charged environment that they had to do for their -- their workforce and for their  
15 reputation.

16 Again, we weren't using the platform to do anything that could lead to violence,  
17 and we made an independent decision to stop fundraising. So if there was some action  
18 they took against us, to my knowledge, we are unaware of it.

19 Q Were you involved with any discussions internally at the RNC regarding  
20 these topics?

21 A I remember, as I previously stated, when Kevin first told me they  
22 deplatformed TMAGAC. But I never recall him telling me that the RNC had some  
23 consequence because of it. And to this date, I don't know of a consequence that the  
24 RNC had because of it.

25 Q And do you know who at the RNC, if anyone, was speaking directly to

1       Salesforce?

2               A     I imagine it was Kevin. This is a speculation that it was Kevin, since he's the  
3       one that told me. And I would also speculate that our counsel was involved.

4               Q     Did you have any con- -- after hearing that from Kevin, did you do anything  
5       else regarding the topic of Salesforce and the RNC?

6               A     To my knowledge, no, because, again, it didn't impact us.

7               Q     Did you do any -- did you have any conversations that you can recall with  
8       anyone regarding Salesforce and actions taken after -- against the RNC?

9               A     The -- again, I don't recall having a conversation after my initial one with  
10      Kevin because there was not an action taken against us, that I remember.

11              Q     That you remember, right?

12              A     I don't recall an action being taken against us, right, correct.

13              Q     Do you recall any kind of investigation or anything the RNC did in relation to  
14      the Salesforce statement or the Salesforce claims?

15              A     At -- for the RNC?

16              Q     Yeah.

17              A     No, not that I recall.

18              Q     Do you recall being updated in a later date that the RNC had taken any other  
19      actions as a concern to the RNC, whether putting -- removing restrictions, adding any  
20      restriction, anything else like that?

21              A     I don't recall being updated or told that. It wouldn't surprise me if Kevin or  
22      someone, you know, did something that had no real impact on us, but I don't recall being  
23      part of that.

24              Q     And when you say that the RNC -- let me switch gears. Are you aware of  
25      anyone internal to the RNC raising concerns that the emails were inflammatory or

1 otherwise problematic in any way, raising it up within the RNC?

2 A I remember I had -- I recall conversations I had with counsel that I probably  
3 shouldn't get into.

4 Q What about, do you remember -- was that just with you and counsel alone?

5 A I believe so.

6 Q Okay.

7 A I believe it was just me and counsel, correct.

8 Q And what about conversations with anyone else who's not counsel regarding  
9 concerns regarding the fundraising emails?

10 A I don't recall additional conversations regarding fundraising emails.

11 Q So is it fair to say, separate from the conversation with counsel, you're not  
12 aware of anyone raising concerns regarding the content or subject matter of fundraising  
13 emails?

14 A That's -- yes, to the best of my knowledge, that's correct.

15 Q Are you aware of anyone on the Trump campaign side raising issues with the  
16 content of fundraising appeals that then somehow made its way to you?

17 A Do you mind just clarifying just during this time period? Is that correct?

18 Q At any time period. In your tenure as chief of staff.

19 A Yes.

20 Q And what time period are you thinking about, if it's one or more than one?

21 A I'm thinking of a specific instance in 2018.

22 Q And very generally, what was that about?

23 A The use of the President's likeness.

24 Q Okay. Separate from that time, are you aware of any other complaints that  
25 came from the Trump campaign or you made -- you were made aware of by someone in

1 the Trump campaign.

2 Mr. Steggerda. If you remember.

3 Mr. Walters. Yeah. I don't remember any, I don't.

4 BY MR. [REDACTED]:

5 Q Are you aware of any claims or concerns regarding the RNC or TMAGAC  
6 sending out emails with fake headers, emails, for example, that suggested they were from  
7 one person when they were in fact from a different person?

8 A Yes. This is into the likeness conversation that -- that I just mentioned.

9 Q Okay. Separate from the -- and that's the likeness of President Trump. Is  
10 that right?

11 A Yeah. Or like Trump HQ, like some -- yes.

12 Q Okay. So let's put that aside. Besides that, any other issues you're aware  
13 of with regard to people complaining about misleading headers and emails?

14 Mr. Steggerda. If you know.

15 Mr. Walters. Not that I recall.

16 BY MR. [REDACTED]:

17 Q What about any complaints that you heard through any means that people  
18 were unsubscribing from TMAGAC or RNC emails but then being resubscribed? Is that  
19 the kind of thing that you would've heard about?

20 A I'm not aware of that happening. I also -- if I would have heard about it, I  
21 would've stopped it, because it's not a way that we operate.

22 Q Now, you mentioned that you hadn't -- I think you -- you know, I know you  
23 haven't reviewed the 600 emails and you weren't otherwise involved in that process.  
24 When you heard about the Salesforce statements, the pausing the emails and in the  
25 aftermath of January 6th, did you or anyone else that you're aware of order a review of

1 the fundraising emails that had come prior to see whether there were any issues that you  
2 may not have been aware of?

3 A Not -- no, not that I recall.

4 Q One second, Mr. Walters.

5 A Sure.

6 Q Are you familiar with the company named DataPeer?

7 A Not -- no, I'm not.

8 Q Are you --

9 A Just grabbing a bottle of water. Sorry.

10 Q Okay. Are you familiar of any efforts -- and to be clear, when you say  
11 you're not familiar, you never heard the name DataPeer. Is that right?

12 A I have heard it recently, but I am not familiar with it. And before that, I  
13 don't recall hearing it.

14 Q Okay. So separate from any recent conversations, you're not aware of it  
15 from, let's say, 2021 and earlier, no recollection of hearing that?

16 A No, not that I recall.

17 Q Are you aware of any efforts -- are you aware of the RNC providing its copy  
18 or emails to any other Trump campaign-related entity for -- to be sent to non-RNC or  
19 non-TMAGAC recipients?

20 A I'm sorry, what?

21 Q I'm asking -- there's -- what we've learned is there were emails that were  
22 sent using RNC copy --

23 A That's right.

24 Q -- to non-RNC recipients, to non-TMAGAC recipients. Is that something that  
25 you were aware of or otherwise was brought to your level?

1           A    So just to make sure I understand this potentially, but I want to make sure I  
2 understand this correctly. So an email is drafted and sent to an individual who is not on  
3 an RNC list or TMAGAC list. Is that correct?

4           Q    Well, it's a little different than that. Let me add a little more detail to  
5 properly explain it.

6           People were basically taking emails that went out through the TMAGAC-Salesforce  
7 kind of normal, you know, out and, instead, they were using a different company to  
8 basically prepare new lists or new IP addresses to be sent by the Trump campaign in the  
9 future.

10          Does that help you understand what I'm saying?

11          A    Yeah. That's different than what I was thinking.

12          Q    Okay.

13          A    I was thinking you were talking about prospecting. But -- so this is not that.  
14 Then, no, I am not familiar with that.

15          Q    Okay. I want to switch gears a bit. You heard of the concept of alternate  
16 electors, correct?

17          A    Yes.

18          Q    When did you first become aware of an effort to have Trump or Pence  
19 electors cast votes in contested States regardless of the declared outcome?

20          A    I mean, I don't really -- I don't -- I don't remember. I -- I believe I was  
21 peripherally aware of it sometime in probably December maybe. But then, really, that's  
22 when I was originally aware of it, but came more to understand like the whole contingent  
23 elector piece really this year with the news reports and stuff that is -- that have come out.

24          Q    Okay. So just -- there's an article from pre-election saying that Republicans  
25 may test the assumption that electors will be chosen by the popular vote.

1           Are you aware of anything pre-election about discussions about something like  
2 this where electors -- where alternate electors might be selected or called upon to act  
3 pre-election?

4           A    No. I'm not aware of that.

5           Q    Okay. Now, going to December 2020, when you became aware of this  
6 concept, tell me what was your understanding of this effort.

7           A    So my understanding was that States would -- not all of them, but some of  
8 them -- these contingent electors would meet in kind of like a ceremonial way. And  
9 then, in the event that any of this litigation succeeded and may have changed the  
10 outcome of a State, those contingent electors could cast a vote. That's my -- that's  
11 about the depth of my awareness or knowledge of it.

12          Q    Are you aware of a call that Ronna McDaniel had with President Trump and  
13 John Eastman in early December?

14          A    I'm not.

15          Q    Are you aware of any conversations that Ronna McDaniel had with President  
16 Trump regarding the alternate electors concept?

17          A    I really don't -- don't know of any. I don't recall any, her telling me about  
18 any conversations she had with the President regarding the contingent electors. I mean,  
19 like I said previously, at this point in time, I was really focused on Georgia and the Senate  
20 races there. That was kind of my -- the focal point.

21          Q    Are you aware of Ms. McDaniel having conversations with John Eastman  
22 post-election but pre-January 6th about any issue?

23          A    I am not aware, because I don't recall an instance like that.

24          Q    Do you recall any discussions that Ms. McDaniel had with you or mentioning  
25 with you John Eastman?

1           A    I do not recall any conversations about John Eastman with her or, quite  
2 frankly, anyone.

3           Q    Do you recall any discussion regarding efforts -- well, let me rephrase that.  
4           Are you aware that at some point this elector effort as a contingent angle  
5 somehow eventually became morphed into something else?  Are you aware of what I'm  
6 talking about?

7           A    I am aware of it today, was not aware of it back then, and don't recall having  
8 any knowledge of it back then.

9           Q    Do you have any knowledge of individuals at the RNC helping coordinate  
10 with electors from different States?

11          A    I mean, I recall like being copied on like one or two emails maybe about  
12 individuals working to get these contingent electors to meet ceremony -- like  
13 ceremoniously like I discussed.  But, again, I wasn't really involved.  I wasn't really  
14 involved in organizing that and wasn't -- don't have much knowledge beyond that.

15          Q    Who was involved there and who lead the effort from the RNC?

16          A    I -- I can tell you who -- who I know to I believe was involved.  I don't know  
17 who lead the effort.  I wouldn't even -- to my knowledge, the RNC didn't lead the effort.  
18 They were at the direction of the -- the Trump campaign.  But, you know, the only  
19 individual that I remember being involved -- or individual remember being involved are  
20 the political director and his assistant at the time.  But --

21          Q    And who's the political director?

22          A    At the time it was Chris Carr.

23          Q    And who's his assistant?

24          A    At the time, her name was Emily Moreno.

25          Q    And what was your understanding of their involvement?

1           A    That they were helping get -- or they were reporting back of individuals who  
2 were meeting ceremonially as contingent electors in the event any of this litigation  
3 prevailed in court.

4           Q    And when the -- the emails you're referencing, are those emails with Chris  
5 Carr and Emily Moreno?

6           A    I believe that -- I believe the email was from Chris. I don't remember for  
7 sure, though. I'm sorry.

8           Q    Do you remember -- do you know someone by the name of Brian Barrett?

9           A    Yes. He was RPD for us.

10          Q    I'm sorry, what's that term you used?

11          A    Sorry. A regional political director, an RPD.

12          Q    And for what region?

13          A    I believe the south.

14          Q    Okay. Are you familiar -- are you aware of him coordinating with electors  
15 in the south?

16          A    I don't recall. I don't have any -- recall a memory of that.

17          Q    What about Mandy Abbott, do you know who that is?

18          A    She is an attorney for the RNC.

19          Q    And are you familiar with whether she was involved with anything with the  
20 electors?

21          A    I -- I don't recall. I'm not -- I'm not familiar with anything, that I remember.

22          Q    And what about Jeremy Hughes, do you know who that is?

23          A    Also an RPD for the western -- mountain western region.

24          Q    And are you aware of him coordinating with electors regarding Nevada?

25          A    I -- I don't recall that, with having a memory of that, no. I mean, look, like I

1 said, I was -- knew about it peripherally and that Chris was helping these folks do it  
2 ceremonially. I don't know what any directive or any conversations he had with them.  
3 And, you know, at the time, my main focus was Georgia. I wasn't focused on this.

4 Q And what about John Black, you know who that is?

5 A He's RPD.

6 Q For which region?

7 A For the northeast and part of the Midwest.

8 Q Like Wisconsin?

9 A For the northeast part he was.

10 Q Would Wisconsin be within his region?

11 A I don't -- I don't remember, to be honest with you.

12 Q And I assume with him, no awareness of conversations regarding the  
13 electors?

14 A Yeah, I don't recall conversations with him either.

15 Q Did you have any role in the shift to sending the electors, in relation to  
16 January 6th, the decision to include them for that? Were you aware or otherwise  
17 involved with that?

18 A I -- I'm sorry, do you mind restating the question?

19 Q Sure. What we understand is that, initially, some people in their position,  
20 as you've said, have thought these electors were perhaps contingent or there if the  
21 lawsuits were successful. Obviously, those lawsuits were not successful, and there is a  
22 move for these electors, for their votes to be sent to Congress for consideration in  
23 January 6th.

24 First, were you aware of that decision to shift the strategy? And then, two, if you  
25 were aware, tell us about who was involved with that.

1           A    At the time, no, I had no knowledge of it. I don't remember having  
2 knowledge of it or being involved in that at all. I'm aware of it now because of like press  
3 reports that have come out recently. You know, like John, who you mentioned, and  
4 Jeremy and Brian, they were all in Georgia with me. John was running, at this point in  
5 December, was really running point in Georgia on the two Senate races there and the  
6 ground game -- the ground team. I mean, like I said, we had 600 people there. And  
7 that was really the focus of the field folks at that time.

8           Q    Are you aware of any RNC involvement after December 14th?

9           A    I'm sorry. With regard to anything specific?

10          Q    With regard to electors. Anything to do with electors. So post the  
11 certification day, after that, are you aware of any RNC involvement with anything to do  
12 with electors concerning the Presidential election?

13          A    No. The extent of what I remember was that they helped organize these  
14 contingent electors, but I don't remember the exact dates. I assume it was before the  
15 14th, but I would -- I don't remember the exact date.

16          Q    Okay. Are you familiar with the lawsuit that went to the Supreme Court  
17 that's often called the Texas lawsuit? Do you have -- do you know what I'm talking  
18 about, where the various State attorney generals signed on?

19          A    Yeah. I'm aware of it, but I'm not -- I don't recall the details of it.

20          Q    Okay. Do you generally recall that a variety of State attorney generals  
21 joined on to a brief challenging the election?

1

2 [2:15 p.m.]

3 Q Okay. Do you generally recall that a variety of State attorney generals  
4 joined on to a brief challenging the election?

5 A I know that a variety -- or, it's a lot of them signed on to a brief at the  
6 Supreme Court. I don't remember the details of it. I know it was something to do with  
7 the election. I don't -- again, if they were challenging it, I don't know.

8 Q Are you aware of any efforts from the RNC to persuade State attorney  
9 generals to sign on?

10 A Not that I -- no. Not that I know of or not that I recall.

11 Q Are you aware of any RNC involvement in general with the lawsuit?

12 A With that particular lawsuit? I don't recall any involvement in it.

13 Mr. Steggerda. Hey, [REDACTED], do you want to take a quick 5 just for a bathroom  
14 break?

15 Mr. [REDACTED]. Yeah, let's take a quick 5. And then we can circle up and  
16 see where we are.

17 Mr. Steggerda. Yeah, it's 2:15. I want to be sensitive to my client's schedule.

18 Mr. [REDACTED]. Okay. See you in 5.

19 Mr. Walters. Thank you.

20 Mr. Steggerda. Okay.

21 [Recess.]

22 Mr. [REDACTED]. All right. We are here.

23 Thank you, Todd.

24 Mr. Walters, I think we're nearing a good point.

25

BY MR. [REDACTED]

1 Q So let's go to January 6th.

2 A Okay.

3 Q You were in Georgia on January 5th. You come back. Were you in D.C. on  
4 January 6th or still in Georgia?

5 A Well, just to clarify, I was in Florida on January 5th and on January 6th.

6 Q Okay. My apologies. I misremembered. So you were in Florida. And  
7 was that for the winter meeting or something else?

8 A Yes.

9 Q Okay.

10 A The RNC winter meeting.

11 Q And I think you previously told us that on the 6th you had concerns, of  
12 course, because there was, I think, an explosive found near the RNC building. And so I'm  
13 just noting that for the record.

14 So let's hop -- tell us when you found out -- when you became aware there was  
15 violence at the Capitol.

16 A I mean, if I remember correctly, I think it was sometime in the afternoon.

17 So, just for context, at these meetings, we're constantly scheduled, like, back to  
18 back to back. So, you know, Budget Committee, Rules Committee, you know, just  
19 typical committee business.

20 And I remember, that morning, being pulled out of a Budget Committee meeting  
21 to be -- I get a phone call from our security director to let us know that there was a bomb  
22 at the RNC. I informed the chair. Obviously kept tabs on that with the security  
23 director.

24 And then sometime in the afternoon, my comms director -- and I don't remember  
25 exactly when, but -- let me know that there was an attack on the Capitol that afternoon.

1 And we turned on TV, were horrified, and obviously condemned it immediately.

2 Q Were you in contact with Ronna McDaniel that day?

3 A I was.

4 Q Okay.

5 And were you -- and you watched all the events that occurred on television, you  
6 watched it all from Florida, correct?

7 A Correct.

8 Q When did you start -- or, did you at some point begin having discussions as  
9 to how the RNC should respond?

10 A I mean, yeah, we put out a statement -- I don't remember the exact time,  
11 but, like, you know, late afternoon -- condemning the violence. If that's what you mean  
12 by "response." That's what we did.

13 Q Yeah. I'm asking, like, when that -- I think -- I mean, what we have here is  
14 that -- is, yeah, we have a statement here from you. Oh, that's not from you, but we  
15 have an email from you where you circulate it.

16 But I want to back up a little. And, like, about those conversations, who made  
17 the decision regarding the statement? Who was involved in drafting it?

18 A My comms director and I made the ultimate decision and sent out the email.  
19 And I probably ran it by the chair. I don't remember for sure, but I probably did. In a  
20 situation like that, I would have. I just don't remember the exact instance of doing it.

21 Q How often would you say you spoke with the chair that day?

22 A Often. I mean, I was next to her for most of the day, because we were in  
23 committee meetings together.

24 Q Okay. That's helpful. So she was physically with you a lot of the day.

25 A Right.

1 Q Okay. Did you and the chair have any discussions regarding the President's  
2 response that day?

3 A I don't recall. I'm not even sure that I was really engaged. Like I said, we  
4 saw the violence happening on TV, and it was in between meetings, but I don't think I  
5 really fully understood the magnitude and gravity of what was going on until later that  
6 night when I was in my hotel room.

7 You know, not to beat a dead horse, but we had the bomb at our building, and all  
8 of our staff inside was what my priority was that day.

9 Q Uh-huh.

10 So -- and you may not know this, but I just want the record clear. So, around  
11 2:24, President Trump tweets that Vice President Pence, quote, "didn't have the courage  
12 to do what should have been done to protect our Country and our Constitution."

13 Were you aware before your statement went out about that tweet?

14 A I don't -- I don't recall being -- I mean, I don't recall either way. I can tell  
15 you, that statement would not have -- or that tweet would not have impacted our  
16 statement.

17 Q Okay.

18 A We were going to put a statement out.

19 Q Did you remember the President's video that day, when he released a video?

20 A I don't. I mean, I know he released one. I don't recall when or really the  
21 content of it.

22 Q Do you recall watching it in real-time, like, on television when everyone else  
23 did?

24 A I definitely did not. Again --

25 Q Okay.

1           A    -- I am not trying to sidestep, but I was just in meetings. I was just in  
2 meetings all day until that night.

3           Q    Did the RNC winter meeting pause at all for the attack, or was there -- like,  
4 how did it impact the winter meeting?

5           A    Well, I think that we were all still trying to figure out what was going on in  
6 those first hours and days afterwards and, like, what was happening.

7           You know, there was an impact in the sense of people were upset to see it  
8 happening. People were upset that there was a live bomb at our building, you know,  
9 threatening to kill our staff.

10          And, also at the same time, there was a truck found outside of our building filled  
11 with ammunition and firearms and homemade Molotov cocktails, you know, that had  
12 napalm in them, or homemade napalm in them.

13          And, I mean, there -- so there was definitely a lot of emotion among the members,  
14 just with everything going on, because there was a lot of confusion.

15          Mr. Steggerda. Hey, [REDACTED], are you --

16          Mr. [REDACTED]. Yeah.

17          Mr. Steggerda. -- just trying to establish the chron? Or are you of the view that  
18 maybe the RNC actually condoned violence? Which is inconsistent with Richard's  
19 statement.

20          Mr. [REDACTED]. Todd, I think --

21          Mr. Steggerda. If --

22          Mr. [REDACTED]. Well, I'm not saying they condoned violence. So I can  
23 stop you there. I'm not doing either. I know what the chron is, because the President's  
24 statements were public. I have the RNC statement, which I've just alluded to, so I know  
25 what it says.

1 I'm trying to understand -- Mr. Walters says he was involved and seemingly led the  
2 drafting of a statement. I'm trying to get a sense of what he knew or didn't know about  
3 the day's actions before the statement. That's all.

4 Mr. Steggerda. Okay.

5 Mr. Walters. Yeah. Look, there was a lot of -- I had a lot of -- I'm not sure I  
6 would say I led the statement. I think my comms director did. He did the first draft,  
7 and we worked on it.

8 But, look, there was a lot of emotion in me that day, from what was happening at  
9 the Capitol, but, again, from what was happening in my office. I mean, I have staff  
10 members there who I care very much so about who could've walked outside and been  
11 killed. So there was definitely a lot of emotion.

12 BY MR. [REDACTED]:

13 Q Did -- and is the -- was it Mr. Ahrens? Is he the comms guy you're talking  
14 about?

15 A Yeah, Ahrens was the -- who helped draft the statement. And I don't know  
16 if he worked with Reed on it or not, but he was the one who originally went through it  
17 with me.

18 Q And, obviously, Mr. Ahrens was -- I mean, the name of the statement  
19 is -- and we can put it up, exhibit 20. It says, "RNC Members Condemn Violence at  
20 U.S. Capitol."

21 We can zoom in a bit, please. And if you can scroll down, please.

22 You can stop there.

23 So this is the statement we've been talking about, right?

24 A Yep.

25 Q Do you recall President Trump's tweet at the end of that night saying that

1 these are the things -- and I'll read you the quote, his tweet.

2 It says, quote, "These are the things and events that happen when a sacred  
3 election landslide victory is so uncer-" -- what's that word I can't say?

4 Ms. [REDACTED]. "Unceremoniously."

5 Mr. [REDACTED]. I can never say that word.

6 BY MR. [REDACTED]:

7 Q -- "& viciously stripped away from great patriots who have been badly &  
8 unfairly treated for so long. Go home with love & in peace. Remember this day  
9 forever!"

10 Do you remember that statement generally from President Trump?

11 A Generally, I remember. I don't remember when I saw it or heard it, but I  
12 generally remember it.

13 Q And what was your -- tell me about your reaction to the President's claims  
14 that the sacred landslide election victory was viciously stripped away from great patriots.

15 A I -- I don't necessarily, I'm sure, have a response to that one line, but just the  
16 general statement as a whole I found to be egregious.

17 Q And why is that?

18 A Because, again, I had a lot of emotion that day, as I think a lot of us did.  
19 And the Capitol was attacked, and I had staff members and friends who were in the  
20 Capitol that day and who were in the building where there was a bomb placed. And I  
21 thought the tone was way off and not a tone of what should've been coming out of the  
22 White House that day.

23 Mr. [REDACTED]. Todd, can you give us just 30 seconds? We just want to  
24 confer.

25 Mr. Steggerda. Yeah.

1 Mr. [REDACTED]. All right. Give me 30 seconds.

2 [Pause in proceedings.]

3 Mr. [REDACTED]. All right.

4 Mr. Walters, we're going to -- we're going to go into recess here, as we say in  
5 Congress. I think it's a good stopping point.

6 Thank you for taking out the time. I know it's been a long  
7 morning-slash-afternoon, perhaps, but thrilling nonetheless. Thank you for taking out  
8 the time today and, both, the last time we spoke.

9 To the extent, when you talk to your lawyer further, if you have things that you  
10 want to clarify or things you think we should know, things you want to add, we welcome  
11 that. So, if you get home and decide, I really think they missed a point on this, or I  
12 wasn't clear, or they weren't clear, reach out to Todd, and he can always contact us, and  
13 we can try to do what's necessary to respond to any concerns you may have.

14 But, before we adjourn, anything else you want to put on the record?

15 Mr. Walters. No, I don't have anything.

16 Mr. Steggerda. [REDACTED] could I just put a request on the record for a copy of the  
17 transcript, to include the video, at some point in the process?

18 Mr. [REDACTED]. I mean, I think you're happy to make the record. That  
19 record is not reviewed for requests, so if any requests -- the record is to me. There's no  
20 one else who's reviewing the transcript to see whether lawyers made on-the-record  
21 requests. So we can talk about that separately, Todd. And the House rules will govern  
22 as to what happens with both the transcript and the audio or video recording. Okay?

23 All right. Well, thank you, gentlemen.

24 Thank you to the staff who joined.

25 And thank to you the reporters as well, who had to hear us talk over each other a

1 lot, which I'm sure was frustrating, but we appreciate all the work you've done as well.

2 All right. We will go into recess, subject to a recall by the chair.

3 Thank you, gentlemen.

4 Mr. Walters. Thank you.

5 [Whereupon, at 2:35 p.m., the interview was recessed, subject to the call of the  
6 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.

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Witness Name

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Date