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

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11 INTERVIEW OF: JULIE RADFORD

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Tuesday, May 24, 2022

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Washington, D.C.

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The interview in the above matter was held via Webex, commencing at 3:01 p.m.

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2 Appearances:

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5 For the SELECT COMMITTEE TO INVESTIGATE

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

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8 [REDACTED] SENIOR ADMINISTRATIVE ASSISTANT

9 [REDACTED] CHIEF CLERK

10 [REDACTED] INVESTIGATIVE COUNSEL

11 [REDACTED] INVESTIGATIVE COUNSEL

12 [REDACTED], SENIOR INVESTIGATIVE COUNSEL

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15 For JULIE RADFORD:

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17 DANIEL BENSON

18 KASOWITZ BENSON TORRES LLP

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[REDACTED] So this is a transcribed interview conducted by the House Select Committee to Investigate the January 6th Attack on the United States Capitol pursuant to House Resolution 503.

Ms. Radford, thank you for joining us.

Could you please say your name and spell it for the record?

Ms. Radford. Julie Radford, J-u-l-i-e R-a-d-f-o-r-d.

[REDACTED] Thank you.

This will be a staff-led interview. My name is [REDACTED] I'm a senior investigative counsel with the staff of the select committee. I have with me by Webex [REDACTED] who is an investigative counsel.

Members may choose to join the interview, but as of now, there are none on. If any do join, I'll let you know, and they can ask a question if they so choose. But, otherwise, it will be myself and possibly [REDACTED] asking questions.

I know you have Mr. Benson with you.

But, Mr. Benson, could you please just note your appearance for the record?

Mr. Benson. Daniel Benson with Julie Radford from the firm Kasowitz Benson.

Daniel, and then Benson, B-e-n-s-o-n.

[REDACTED] Thank you.

Ms. Radford, I'll just go over a few ground rules to help things go smoothly today.

There is an official reporter who's writing down what you're saying, creating a transcript. So if you could, just wait to answer a question until I finish asking before you begin your answer. And I'll wait until you finish your answer before I ask the next question.

And if you respond in a nonverbal way, like shaking your head or nodding your

1 head, the reporter can't transcribe that. So I'll just follow up and ask you to say yes or
2 no.

3 We ask today that you provide answers that are complete based on your best
4 recollection of the events we'll discuss. If a question I ask or someone else asks is not
5 clear, just tell us and we'll do our best to rephrase it so it is clear. And if you don't know
6 the answer or you don't remember, just say so.

7 If you need to take any breaks for comfort or to talk to Mr. Benson privately, let us
8 know, and we're happy to accommodate that. We can turn the cameras off and go on
9 mute, whatever you need.

10 Throughout the interview, there may be times when I show you exhibits. A
11 colleague of mine will put them up on a screen. I sent them to Mr. Benson yesterday so
12 you could get a chance to review them in advance.

13 But putting that aside, if you need more time to look at them when they're on the
14 screen, take as much time as you need, and let me know when you're ready to answer
15 questions about them.

16 I also want to remind you, as we do all witnesses before we start, that it's unlawful
17 to deliberately provide false information to Congress and that to do so could result in
18 criminal penalties.

19 So any questions before we get started?

20 Ms. Radford. No.

21 [REDACTED] If you could, when we progress through the interview, if you could
22 lean closer, I think it picks up the audio better for you.

23 EXAMINATION

24 BY [REDACTED]

25 Q I want to note for the record that you're appearing today voluntarily,

1 without the need for a subpoena. Is that right?

2 A Yes.

3 Q Thank you for doing that. The select committee appreciates it.

4 How old are you, Ms. Radford?

5 A Thirty-nine.

6 Q And what is your highest level of education?

7 A Bachelor's.

8 Q What's your current occupation?

9 A I'm currently self-employed.

10 Q What type of work do you do, just as a general matter?

11 A I'm doing consulting, primarily around communications and reputation risk
12 management.

13 Q Is it right that you served as chief of staff for Ivanka Trump during her time in
14 the White House, at least through the end of the Trump administration in January of
15 2021?

16 A Yes.

17 Q Approximately what year and month did you start in your role as chief of
18 staff for Ms. Trump, as best you can remember?

19 A March -- I started as chief of staff with her in March of 2017. I started at
20 the White House in February of 2017.

21 Q For that one month before you transitioned over, what was your role?

22 A I was working -- I actually didn't have a title. I was working under Dina
23 Powell doing economic initiatives and family policy.

24 Q Now, focusing on the end of President Trump's administration, really from
25 the election through to January of 2021, what as a general matter were your

1 responsibilities as chief of staff for Ms. Trump?

2 A From November until the end?

3 Q If they were different during that time, that's really what we're focused on.

4 A Okay.

5 Q But just for those 3 months, just what were your general responsibilities?

6 A Policy, transitioning our office, doing wrap-up memos, helping off-board our
7 team.

8 We did some -- if I remember correctly, there was a budget or resolution or
9 something going through at the time. So working on some legislative stuff around that.

10 Q With regard to the transition and the wrap-up, as you talked about, when
11 did those efforts begin after the election, as best you can remember?

12 A I would say probably mid-November, the stuff I was looped in on where kind
13 of the points for each primary office, so the policy offices and whatnot, were brought in
14 to start -- we were given a guide on how to start working on transition memos and
15 wrap-up materials simultaneously just for Presidential records and stuff, making sure that
16 our team -- I made sure our team knew what they needed to do.

17 Q And just logistically, your office space, was it in the West Wing?

18 A Yes.

19 Q And where was it in relation to Ms. Trump's office?

20 A Next door.

21 Q And approximately how many feet away was your desk from Ms. Trump's
22 office?

23 A Around 10 feet.

24 Q It's not a math test.

25 A No, I mean, you walked out of my door, you probably walked 10 feet and

1 you were -- or, less, 5 feet -- and then you were in her office.

2 Q And at this time they were talking about -- it was right around the time the
3 vaccine came out and so the pandemic was still kind of in the middle of it.

4 Were you coming into work every day, or were you working remotely? What
5 was your work schedule like as a general matter?

6 A So right after the election, for two and a half weeks, I didn't go into the
7 office. And then I was in the office.

8 Q Election night, were you at the White House?

9 A Yes.

10 Q Were you there through the speech that President Trump gave in the early
11 morning hours of November 4th?

12 A Yes.

13 Q Were you involved in any discussions with the President about what he
14 should say in that speech?

15 A No.

16 Q Did you hear anybody else giving the President advice about what he should
17 say?

18 A No.

19 Q To your knowledge, did Ms. Trump speak with her father about what he
20 should say that night?

21 A No. Sorry. I don't know. I know she spoke with her father. I don't
22 think it was about what he should say. But I don't know.

23 Q If you recall, during his remarks in the early morning hours of November 4th,
24 President Trump said that he did win the election but that the votes that were coming in
25 were effectively a big fraud, a major fraud on the American public.

1 Do you remember just in sum and substance that he said those things that night?

2 A I don't.

3 Q Well, going forward from that night, and understanding you were at home
4 for two and a half weeks after that, do you know whether Ms. Trump was involved in the
5 efforts of President Trump and those working on his behalf to challenge the results of the
6 election?

7 A She was not.

8 Q Did she ever share with you her views on those efforts to challenge the
9 election?

10 A She did not.

11 Q Did she ever share with you her views about the people that President
12 Trump was working with to challenge the election, whether that's Sidney Powell or Rudy
13 Giuliani or any other members of the team?

14 A No.

15 Q Did Ms. Trump ever express with you or share with you her views on
16 whether there, in fact, was fraud in the election?

17 A We discussed whether or not there was fraud in the election, not so much
18 personal views but just the discussion that was happening around us, if that makes sense.

19 Q And to provide more color on those discussions, did the two of you discuss
20 whether the claims that were being made by President Trump and those on his behalf
21 were true or not?

22 A No, just that things were being looked into. I would say that was from
23 Tuesday until Saturday.

24 Q You're talking about election day through the day that the networks
25 declared that President Biden had won the election?

1 A Yes.

2 Q After that day, when President Biden was declared the winner, did you have
3 discussions with Ms. Trump about the continuing efforts --

4 A No.

5 Q -- of the Trump campaign to challenge the results?

6 A No.

7 Q Did she ever share with you whether she thought it was a good thing for her
8 father to continue challenging the election?

9 A No.

10 Q Did she ever -- were you ever present for or did Ms. Trump ever tell you that
11 she herself had a conversation with her father about whether he won or lost the election
12 prior to him leaving office?

13 A Prior to him? Yes.

14 Q Okay. And what did she tell you about her conversations with her father
15 about whether he had won or lost?

16 A Just that she had talked to her father and that -- in the context of transition.

17 Q And what do you mean by that?

18 A Proceeding with transition and having a smooth transition of power.

19 Q And what did her father tell her during that conversation? What did she
20 relay to you about that?

21 A She didn't relay anything from his perspective.

22 Q What was her perspective then that she shared with him and then told you
23 about?

24 A She talked about proceeding with the transition of power and a smooth
25 transition of power.

1 Q Just so I'm understanding, in other words --

2 A [Inaudible] Biden, making sure that memos were done, information was
3 done, that everything went smoothly.

4 Q Approximately when was that conversation that she had with the President?

5 A It was probably when I was back, so probably like in mid-November, maybe
6 right after Thanksgiving. I don't remember when Thanksgiving was that year. But right
7 around that time.

8 Q Did Ms. Trump tell you that she was advising her father that he should allow
9 for the smooth transition of power or that she herself, within her area of responsibility,
10 was going to proceed with the transition?

11 A That she believed there should be a smooth transition of power;
12 simultaneously, our team should be working on transition.

13 Q And do you know what prompted the need for Ms. Trump to have that
14 conversation with her father?

15 A No.

16 Q And why did she tell you about it? Did it affect your responsibilities or day
17 to day?

18 A I mean, it affected my day to day in that we had an entire policy portfolio
19 that we needed to make sure was categorized and left in a way that someone else could
20 pick it up and understand where certain things stood and be able to make decisions one
21 way or another.

22 Q Did she tell you that President Trump in any way sought to keep her from
23 proceeding with the smooth transition of power?

24 A No, she did not.

25 Q So as far as you understood, you had the green light to proceed with that

1 work?

2 A Yes.

3 Q Did that change at any point between then and when President Trump left
4 office?

5 A No.

6 Q Now, I imagine you were aware, say, from mid-November through
7 January 6th, that President Trump and his team did continue to make efforts to challenge
8 election results, whether in court or otherwise. Is that fair?

9 A I was aware by watching the news.

10 Q Did you ever speak with Ms. Trump about whether she should advise her
11 President -- her father, the President -- to stop those efforts and just move on?

12 A No.

13 Q Did anyone else within the White House, Ms. Trump excepted, ever relay to
14 you a conversation they had directly with President Trump between election day and
15 when he left office about whether he won or lost the election?

16 A No.

17 Q And prior to January 6th, were you privy to any discussion among White
18 House staff, Ms. Trump included, about Vice President Pence's role on January 6th at the
19 certification of the election?

20 A No.

21 Q One of the three exhibits that I sent to Mr. Benson yesterday, we'll show it
22 now, is exhibit 2. And this is an email that a gentleman by the name of Ivan
23 Raiklin -- that's R-a-i-k-l-i-n -- sent on December 23rd of 2020 to several people. And
24 you're among them and so is Ms. Trump. And it's about a proposal for Vice President
25 Pence to refuse to receive, in the words of the proposal, the electoral votes from certain

1 States.

2 Do you remember receiving this email or any communications like this about Vice
3 President Pence's authority with regard to the electoral votes?

4 A No.

5 Q Do you know who Mr. Raiklin is?

6 A No.

7 Q Do you remember doing anything just generally with respect to information
8 like this regarding the election and Ms. Trump?

9 A Deleting it.

10 Q So then looking forward to January 6th and the event at the Ellipse, you're
11 aware generally with the fact that the event occurred and that President Trump spoke at
12 it?

13 A Yes.

14 Q Do you know Katrina Pierson?

15 A Yes.

16 Q How do you know Ms. Pierson?

17 A I met her -- originally she -- I think it was maybe 2017, the first time I met
18 her. I don't remember how. Someone invited us -- I mean, sorry, introduced us.

19 Q And one of the three exhibits I share, we don't need to bring it up unless you
20 would like me to, is just an email exchange you had with Ms. Pierson. She wrote you on
21 January 4th of 2021, and then you followed up on the 5th, about whether or not Ms.
22 Trump would speak at the event.

23 Do you remember speaking with Ms. Pierson about that?

24 A I remember the email from her asking. I didn't know anything about the
25 event at the time when she sent that email. I responded the next day after trying to

1 figure out what the event was, what this rally was. And all I knew was that there
2 was -- what I gathered from scheduling was that there was a rally on the Ellipse. And I
3 replied to Katrina.

4 Q And you asked if you could give her a call to speak. Did the two of you end
5 up speaking by phone as best you can remember?

6 A I actually don't think we ended up speaking by phone.

7 Q How did the conversation end up between you and Ms. Pierson?

8 Ultimately, we know Ms. Trump didn't speak at the Ellipse rally. But do you remember
9 what you talked to Ms. Pierson about concerning the event?

10 A So I remember that I asked her to call me because I wanted to know where
11 the request for her to speak was coming from, just so I understood, and then telling her
12 that likely that she would not be -- she would not be speaking. I wasn't 100 percent sure
13 if she would attend or not. But for purposes of planning and because it involved Secret
14 Service, that they could plan like she was attending, but I wasn't 100 percent sure.

15 Q And I can read from the email. It might be helpful just to bring it up. It's
16 exhibit 3.

17 If we go to the bottom of the first page.

18 Can you see that, Ms. Radford?

19 A Yes.

20 Q Okay. We'll continue going on to the bottom of that first page to where
21 Ms. Pierson first writes to you, right there.

22 A Uh-huh.

23 Q And you see that at -- in the first email she sends, she starts off, "POTUS
24 asked me if Ivanka was speaking at his January 6th Stop the Steal event, and I wasn't sure
25 if she wanted to say a few words or not."

1 So in terms of you wanting to understand where the ask was coming from, did you
2 come to understand it was from the President himself?

3 A Yeah. Well, a lot of times people would email me and say the President
4 asked, because that would get -- that would then mean that she would -- might lean
5 towards doing something. I'm not sure. So I've gotten a lot of emails that say POTUS
6 asked or the President asked or her dad asked.

7 So then I got the context, tried to figure out who else was speaking, which was
8 some of my questions, and then got back to her.

9 Q Now, the fact that Ms. Pierson characterized the event as a Stop the Steal
10 event, as you saw there in that first email she sent, did that raise any concern or thoughts
11 in your mind about whether this was an event that Ms. Trump would want to speak at,
12 given the nature of it?

13 A I saw it and thought this is not something that she would want to speak at.

14 Q Why is that?

15 A She didn't really speak that often at big rallies, and I think just probably the
16 title.

17 Q In other words, stopping the steal relating to the supposed steal of the
18 Presidential election from President Trump?

19 A Yeah.

20 Q And was it your understanding that Ms. Trump did not want to associate
21 with that Stop the Steal messaging and efforts?

22 A Yes.

23 Q Katrina ends up telling you that a few Congressmen, a few Senators, the
24 event organizer, and the boys -- that is, Ms. Trump's brothers -- might be speaking and
25 that it was supposed to be a small event, in her words.

1 Did any of that give you more comfort about whether Ms. Trump would be open
2 to speaking at this, or it was a nonstarter based on the Stop the Steal?

3 A No, it wasn't -- I didn't need comfort. I just knew it wasn't something that
4 she would want to be out there speaking at.

5 Q Did you confirm that with Ms. Trump herself and ask her if she would speak
6 at it, or did you just make the decision based on what you knew her position would be?

7 A I think by the time I replied to Katrina I had not gotten in touch with her to
8 talk to her about it. But I had, just knowing her, made the decision.

9 And, like I said, I said that she would attend, because from a logistical and security
10 perspective, it's easier to say she's not going to -- it's easier to pull her out of something
11 than to put her into something at the last minute from the perspective of Secret Service.

12 And they would stop asking and calling and emailing and texting if I just said, yes,
13 she'll attend, she won't speak.

14 Q At what point, if ever, did you tell Ms. Trump that she had been asked to
15 speak and that you had told --

16 A Sometime that morning.

17 Q Sometime the morning of January 5th?

18 A Yeah.

19 Q All right. And did she agree with you when you said you had told
20 Ms. Pierson that she, Ms. Trump, would not be speaking?

21 A Yes.

22 Q Did she have any further discussion about the event at that point?

23 A No. She just still wasn't sure if she would actually go to the event.

24 Q Now, the next day, as we understand it, you ended up going to the Ellipse
25 rally with Ms. Trump. Is that right?

1 A Yes.

2 Q Do you remember approximately what time you got into work that day?
3 Was it earlier than normal or later or regular time?

4 A It was later than normal. It was around 9:15, 9:30.

5 Q And did you -- we understand that Ms. Trump spent time with her family and
6 President Trump in the residence that morning and then also in the Oval Office. Were
7 you aware that she was in those meetings with her family and the President that morning
8 before going to the Ellipse?

9 A I knew she had been in the Oval with her father and her brothers, because
10 someone had called me to let me know that her siblings were downstairs and if she
11 wanted to go say hi.

12 Q Before she left for that, did you already know that morning that Ms. Trump
13 was going to go to the rally or it was still an open question?

14 A It was still a little bit of an open question.

15 Q Why was that?

16 A I honestly don't know. There were a number of times when just people
17 would want her to go places and we just hadn't made a decision one way or another.

18 Q How did you learn that, and when, that she had decided to go to the rally?

19 A She came back up to her office for a couple of minutes. I think she filmed a
20 video for someone's birthday or for a -- you know, somebody that had requested a video.
21 And then she said, "I'm going to go back downstairs. Meet me out by the cars. I'll, you
22 know, like, you'll know if I'm going if I walk out. If not, just we're not going."

23 So I went down to the cars.

24 Q The time that when Ms. Trump came back upstairs, had she already been in
25 the meeting with her father and her siblings in the Oval Office by that point?

1 A Yes.

2 Q What, if anything, did she tell you at that time about what had happened in
3 the Oval Office?

4 A Nothing.

5 Q What did her mood appear to be like at that time?

6 A A little stressed but not -- like a little stressed.

7 Q So no mention of the call that took place between President Trump and Vice
8 President Pence while she was in the Oval Office at that time?

9 A Not at that time.

10 Q So as we understand it, did you go down and get in the car with
11 Ms. Craddock --

12 A Yes.

13 Q -- to wait for Ms. Trump?

14 A Yes.

15 Q And Ms. Trump ended up coming with you to go to the Ellipse, right?

16 A Yes.

17 Q Did anybody else get in the car with you other than a Secret Service agent?

18 A No.

19 Q Within the car, did Ms. Trump share with you any more details about what
20 had happened or any details about what had happened in the Oval Office that morning?

21 A Yes.

22 Q And what did she say?

23 A That her dad had just had an upsetting conversation with the Vice President.

24 Q And upsetting in what way?

25 A Upsetting for her, like it upset her, the conversation.

1 Q Why?

2 A I think they were angry. There was yelling maybe -- not yelling -- firm
3 talking, I guess, between the two. She didn't get into details. But she was visibly upset
4 and bothered by the conversation.

5 Q Did she express that the conversation concerned what the Vice President
6 was going to do that day regarding the count of the election results?

7 A No, she didn't get into those details.

8 Q And did you have any -- did she express why, other than the fact that the call
9 was heated, why it bothered her, why she was disturbed by the call?

10 A No.

11 Q Did she express any views on Mike Pence? There's been reporting that she
12 told someone else that day that Mike Pence is a good man, something to that effect.
13 Did she make any comments about her views on Vice President Pence?

14 A Yeah. I wouldn't say that she said -- I don't know if she said Mike Pence is a
15 good man, but she did just talk about how the call was upsetting and her dad was angry.
16 And she was visibly bothered by the direction of the call.

17 Q Did the call and how it went have anything to do with why Ms. Trump chose
18 to go to the rally from what she told you?

19 A I suspect yes.

20 Q And why do you suspect as much?

21 A Because I think she wanted to try to help keep her dad calm, if possible.

22 Q And so the relationship between Ms. Trump and her father, is she somehow
23 uniquely situated, based on your observations, to help keep her father calm? Why
24 would she -- I'm just trying to get a sense of why that would be something she felt she
25 could do that day based on what you know.

1 A Just based on my observations, I think that sometimes there are times that
2 she can get through to her father when others can't or when others have hit a wall. And
3 I think that's what -- why she went to the Ellipse that day.

4 Q What did she share with you about why it was concerning that her father
5 was upset or agitated after that call with Vice President Pence in relation to the Ellipse
6 rally? Why did that matter? Why did he have to be calmed down, I should say.

7 A Well, she shared that he had called the Vice President a not -- an expletive
8 word. I think that bothered her. And I think she could tell based on the conversations
9 and what was going on in the office that he was angry and upset and people were
10 providing misinformation. And she felt like she might be able to help calm the situation
11 down, at least before he went onto stage.

12 Q And the word that she relayed to you that the President called the Vice
13 President -- apologize for being impolite -- but do you remember what she said her father
14 called him?

15 A The "P" word.

16 Q I think we understand enough about what that word is. We don't have
17 to -- I won't make you say it. But thank you.

18 And in terms of the misinformation that Ms. Trump was concerned about, what
19 do you mean by that?

20 A I don't know. I just -- she did not get specific. There were just a lot of
21 people that were telling the President one thing or another thing. And I think she just
22 wanted him to deliver a clean, good speech and leave and go back to the White House
23 and proceed.

24 Q And on that point, was there concern that Ms. Trump raised that the
25 President would verbally go after the Vice President at the speech at the Ellipse, in other

1 words, say things about him? Was that something she expressed to you?

2 A No.

3 Q Did you hear anything at that time or before the President took the stage at
4 the Ellipse about his desire to go to the Capitol after he was done speaking?

5 A No.

6 Q When you got to the Ellipse, did you stay with Ms. Trump until the time that
7 the President went on the stage?

8 A Yes, but I was about 15 feet away from her.

9 Q Did she, in fact, spend time with her father before he took the stage?
10 We've seen photos that suggest they were. But did you see that?

11 A Yes.

12 Q And did she stay pretty close to him throughout that time?

13 A Yes.

14 Q So consistent with what she had told you about wanting to try to be a
15 calming influence on him before he took the stage?

16 A Yes.

17 Q Were you able to observe anything about the President's mood before he
18 took the stage that told you whether he appeared calm or not calm? What did you see?

19 A To me, he seemed like he normally did before a rally. I mean, there were a
20 lot of people out there cheering happily for him and excited for him. So it didn't -- he
21 didn't seem any different really than he had been at other -- when I've seen him at other
22 rallies.

23 Q Now, Ms. Trump's siblings and their significant others were there as well in
24 the general area where you were, right?

25 A Yes.

1 Q Did you hear any of them talk about what had happened in the Oval Office?

2 Did that come up?

3 A No.

4 Q How about Mr. Mark Meadows? Did you interact with him that morning
5 before the President took the stage?

6 A Just briefly in the tent to say hi.

7 Q But nothing about what had happened in the Oval Office?

8 A No.

9 Q And the same question with respect to Eric Herschmann. Did you see him
10 there, and did you have any interaction of substance with him?

11 A I did see him. No interaction of substance.

12 Q After the President took the stage and before he came down after delivering
13 his remarks did you talk with Ms. Trump at all about what she said to her father while she
14 was with him there in the tent?

15 A No.

16 Q About what his mood was like and whether he had calmed down?

17 A No.

18 Q Were you able to hear the President's remarks as he was giving them or you
19 weren't paying as close attention?

20 A I wasn't really paying attention.

21 Q What were you doing during that time?

22 A So after the President went onto stage, Ivanka came in, asked me if there
23 was somewhere to watch with less people around. So Rachel and I walked out and
24 found an advance person to ask if there was, like, another viewing area, because a lot of
25 times there will be multiple areas.

1 They showed us a tent, like, further, I guess it would be stage right, off in the back
2 that had heat. And there wasn't really anyone in it other than the technicians, I guess,
3 from, like, a comms perspective or something.

4 So I went back and got her and Eric and Lara and we walked over to the other
5 tent. And they went into the tent. And then Rachel and I kind of were going in and out
6 of the tent.

7 Q And understanding that you weren't paying close attention to the speech,
8 did you hear, while the President was delivering his remarks, him say something to the
9 effect of he was going to go to the Capitol with the rallygoers after he was done
10 speaking?

11 A No.

12 Q Did you hear him during the speech, as he was giving it, speak about Vice
13 President Pence and needing to have courage to do what he needed to do at the Capitol
14 that day?

15 A No.

16 Q After the President was done speaking, did you hear at any point before you
17 left the grounds there at the Ellipse about any disturbance at the Capitol, anything out of
18 the ordinary, like the discovery of a pipe bomb? Anything of that make its way to you
19 before you left the grounds?

20 A No.

21 Q Is it right that you got into the car again with Ms. Trump and Ms. Craddock
22 to drive back to the White House?

23 A Yes.

24 Q Do you remember about what time you got back? And if it helps for
25 context, the records we've seen show that the President himself arrived back at roughly

1 1:20 in the afternoon.

2 A I was going to say probably, I mean, I was going to say 1:15, 1:20. I mean, it
3 was definitely before 1:45.

4 Q And how do you know it was before 1:45?

5 A Because I was trying to order lunch.

6 Q And as we understand it, did Ms. Craddock go down to get lunch for
7 everybody from the Navy Mess?

8 A Yes.

9 Q What time did they stop taking orders there?

10 A That day I think they were just really busy and not understaffed, but I don't
11 know why, it was just really busy that day. They normally stop around 2, but they hadn't
12 been picking up the phone.

13 Q Before you arrived back -- I guess I should say before you left the Ellipse,
14 after President Trump got off the stage, did you interact with him at all? Were you close
15 enough to hear him interacting with other people?

16 A No.

17 Q So do you know whether during that time there was any discussion of him
18 going to the Capitol?

19 A No.

20 Q At any point that day did you hear from anyone, whoever it was, that the
21 President had actually discussed going to the Capitol?

22 A No.

23 Q Did Ms. Trump come back up to her office when you all got back to the
24 White House?

25 A Yes.

1 Q And you did, too?

2 A Yes.

3 Q Was Ms. Trump alone in her office working when Ms. Craddock went down
4 to get lunch, so far as you know?

5 A Yes.

6 Q And what was on the schedule that day for her, if you remember, that
7 afternoon?

8 A I don't think anything.

9 Q Did Ms. Craddock end up bringing -- she was able to get the lunch and bring
10 it back to you guys?

11 A Yes.

12 Q When do you remember first learning that there was violence at the Capitol
13 or a problem or whatever word you want to use, that something was wrong? Before or
14 after --

15 A [Inaudible.]

16 Q Yeah, I was going to say, before or after she came back with the lunch?

17 A After.

18 Q Okay. And then when, if you can remember, you first learned.

19 A I went into Ivanka's office with a memo that I had written, like a transition
20 memo. It was, like, a ten-page document. And she had been reviewing and editing it
21 the day before and that morning. So at some point I went into her office so we could
22 keep looking at it. I left it with her.

23 I went back into my office. I had a text message that said, "Are you okay?" from
24 my husband. I didn't really know what he was talking about.

25 Then went -- the TV was on. So then I, like, turned on the TV. You know, the

1 TV -- I wasn't really paying attention. And I could see something was going on, and I was
2 looking at Twitter. And then I went into her office.

3 Q So the TV that was on, you had one in your office space?

4 A Yes.

5 Q Now, did you have one channel that was on, or was it the four-channel feed
6 that we know would be used elsewhere in the White House?

7 A I don't remember. It would either be the four-channel -- the four-channel
8 or FOX, but I don't remember.

9 Q So what you saw was enough that -- on the TV and on your Twitter -- that
10 you got up and went to go talk to Ms. Trump about it?

11 A Yes.

12 Q And so what -- tell us about that. Tell me about that conversation you had
13 with Ms. Trump when you went in. What did you tell her, and what did the two of you
14 do at that point?

15 A I just said something is going on. I'm not sure what. She was reviewing
16 that memo that I had written. So then we got on Twitter and turned on the TV.

17 From what we were seeing, it was people going toward, like, at the Capitol, but it
18 wasn't -- like, you didn't see people in the Capitol, if that makes sense.

19 And then in that time period, while we were looking on Twitter, one of her
20 brothers had tweeted. So I saw that. And then --

21 Q If I could stop right there. We know that Don Jr. tweeted and linked to a
22 story about the violence and said something to the effect of be peaceful. Exercise your
23 First Amendment rights. Be peaceful.

24 Does that sound about right to you?

25 A Yeah.

1 Q That it was Don Jr.?

2 A Yeah.

3 Q Okay.

4 A So then we said -- I don't know who said it, if it was me or her, but we
5 started working on something for her to write.

6 Q And it sounds like an obvious question, but what was the reaction that you
7 and she had to seeing what you were seeing on the TV and on social media to what was
8 happening at the Capitol?

9 A That was very upsetting. The images that we saw, it was more like -- I don't
10 know if they were Capitol Police. I don't know what type of law enforcement they were.
11 But they were being shoved.

12 And so she thought that same thing, like, this is not how we should be acting,
13 people should be acting. That's law enforcement. Like we should like -- so she was
14 upset.

15 Q And was there any discussion at that time about the need for President
16 Trump himself to make a statement?

17 A I don't remember talking about the President with her in that time period.
18 Just, I mean, my job was with her. So it wasn't whether or not, you know, what he
19 should be doing.

20 Q So did you help craft a statement for Ms. Trump to put out?

21 A We started working on something, and then she left the office.

22 Q Where did she leave to go?

23 A I believe down to the Oval.

24 Q Why did she leave to go there?

25 A I don't know. I mean, I'm guessing it's because what was going on, on TV.

1 At some point -- and I believe it was Eric came in and got her. I was standing in a corner.
2 So someone knocked on the door, and I believe it was Eric, and she went down -- Eric
3 Herschmann.

4 Q Was anyone else in the office with you and Ms. Trump before
5 Mr. Herschmann came in?

6 A Rachel was there at one point, but I don't know what -- if it was before or
7 after Eric.

8 Q And so at the time that Mr. Herschmann came in, you-all had already been
9 seeing the events on the TV and had seen Don Jr.'s, his tweet about the violence at the
10 Capitol, right?

11 A That had not -- it hadn't been very long, if that makes sense. Like it was all
12 very quick, bunched together time-wise.

13 Q Understood. So when Mr. Herschmann came in the office, did he come
14 alone or did he have someone else with him?

15 A I think he was alone.

16 Q And can you describe as best you can his demeanor and what he said when
17 he came in the office?

18 A Not really, because I, like where I was standing, the two of them, they talked
19 and then they left.

20 Q Understood.

1

2 [3:45 p.m.]

3 Ms. Radford. So I don't know. I can't really -- he just asked her, "Come with
4 me."

5

BY [REDACTED]

6 Q Did it sound like a "come with me" in a calm way or was it in a hurried and
7 "this is important and we need to go now," just in terms of the way they were moving and
8 the manner in which they were speaking to each other?

9 A "Important. You need to go." But Eric is like a very solid, even-keeled
10 person. So it's not like he was hair on fire. Like, it was, "Hurry. We need to go."
11 But it wasn't panic, freak out.

12 Q So, so far as Mr. Herschmann goes, for his personality and demeanor, you
13 could tell he was moving with urgency, but it wasn't a panicked state. Fair to say?

14 A Yes.

15 Q And where did he say they needed to go, that's he and Ms. Trump?

16 A He didn't say, but I would -- I assumed downstairs to the President.

17 Q And did you understand why Mr. Herschmann was coming to get Ms. Trump
18 at that time?

19 A No.

20 Q Did Ms. Trump come back to her office at some point that afternoon, after
21 having left with Mr. Herschmann?

22 A Yes.

23 Q Do you know approximately when that was? And I don't mean precisely,
24 but was it that afternoon, was it the evening?

25 A No, it was that afternoon. It was shortly after. I mean, she wasn't gone

1 for a very long time.

2 Q And what was her demeanor? And what did she tell you about when she
3 got back about what had happened, where she was?

4 A That a tweet was sent out.

5 Q By who?

6 A Sorry, by the President, asking people -- I think asking people to go home,
7 telling them to stop.

8 Q Well, if we could break --

9 A I didn't see the tweet at the time.

10 Q Why don't we just -- before we look at the tweet I will just ask, what did she
11 say, that is Ms. Trump say, she did with respect to the President and the tweet? How
12 did she describe the meeting with her father?

13 A She didn't really describe it. She just said that a tweet had gone out. She
14 didn't describe their interactions.

15 Q Did she say at least where she met with him?

16 A No.

17 Q Did you learn at least some point that afternoon, before the day was over,
18 that the President had been in the private dining room off the Oval Office, that's where
19 he was situated?

20 A Yes.

21 Q Did Ms. Trump explain to you what the mood of her father was, what his
22 reaction was to what was happening at the Capitol?

23 A No.

24 Q Did she describe who else was with her when she met with her father before
25 that tweet went out? Now, Mr. Herschmann had come to get her. Did she say if he

1 was there or anyone else was?

2 A I know at one point, I don't know if it was at that exact time, Dan Scavino
3 and the chief of staff and Eric Herschmann, and that's -- those are the names I remember.

4 Q Did she then or at any point describe to you that there was resistance from
5 the President about sending the tweet out or particular language that he was resistant to
6 including in the tweet?

7 A I don't remember that.

8 Q It's been reported and we have otherwise collected information, for
9 instance, that the tweet you're talking about, Ms. Trump was the one who suggested that
10 it include the words "stay peaceful." Does that ring any bell for you?

11 A And that sounds like her, but I don't know.

12 Q At any point that day did you hear from Ms. Trump that her father was being
13 resistant to taking any action with respect to the violence at the Capitol?

14 A No.

15 Q Or from her that she felt the statements he was making were not sufficient
16 and that they needed to be stronger?

17 A Yes. Later in the day.

18 Q So tell us -- tell me about that. What do you recall and what did she say?

19 A I just recall that later in the day it didn't feel like things were calming down
20 as they should and people weren't leaving. And she felt like something should be said or
21 put out that was even stronger.

22 Q By her father, you mean?

23 A Yes.

24 Q And stronger in what sense? To say what?

25 A I don't know.

1 Q If it helps, we can look at the tweets that he did send out that day and to see
2 the progression. If we look at exhibit 1, we can bring that up. We can make that -- we
3 can go to page 2 to start, and we can zoom in.

4 Are you able to see that, Ms. Radford, on the screen?

5 So what I'll do is just direct your attention to this is a tweet by President Trump
6 that was issued at 2:24 p.m. and it concerns -- on the 6th -- and it concerns Mike Pence
7 and the President saying he didn't have the courage to do what should have been done
8 and continues on.

9 Do you remember seeing this tweet and discussing it with Ms. Trump that day?

10 A No.

11 Q The next tweet, on page 3, we can go to that, the President issued at 2:38
12 p.m. And if you read that it says,
13 "Please support our Capitol Police and law enforcement. They are truly on the side of
14 our country. Stay peaceful."

15 So if you look at that and agree with me that there is nothing in there telling
16 people directly to go home. Is that right?

17 A Yes.

18 Q If we look at the next tweet that the President issued, it was at 3:13 p.m., it's
19 on page 4 of this exhibit. It says, "I am asking for everyone at the U.S. Capitol to remain
20 peaceful. No violence! Remember, we are the party of law and order. Respect the
21 law and our great men and women in blue. Thank you."

22 Again, agreed, nothing in there about people going home, right?

23 A Yeah.

24 Q All right. So when you're thinking back on Ms. Trump later in the afternoon
25 and thinking something stronger needed to be said, was it along the lines that the

1 President needed to tell the people at the Capitol to go home?

2 A Yes.

3 Q Are you aware that later that afternoon the President issued a video
4 statement to that effect telling people, at least in part, to go home?

5 A Yes.

6 Q To your knowledge, did Ms. Trump have any role in convincing the President
7 to put out that video statement?

8 A I know that she urged him to do a video statement.

9 Q And how do you know that? Did she tell you she went down to meet with
10 him?

11 A She told me.

12 Q So at some point she left? You had described the first time she went down
13 to the Oval Office to meet with her father. At some point she went down again?

14 A Yes.

15 Q Was it just one other time or do you remember if it was multiple times?

16 A Other than that, I don't remember.

17 Q And what was Ms. Trump's demeanor and mood throughout the afternoon
18 as this, the attack, was progressing?

19 A Visibly upset. Everybody was upset with what was going on. But, yeah, I
20 mean, she was visibly upset and down there when people were asking her to be down
21 there and trying to get action taken.

22 Q So did you have the impression that afternoon from her and seeing what
23 was going on that there was resistance from the President to putting out a stronger
24 statement?

25 A I didn't get -- I mean, I didn't get that -- she didn't tell me that directly, no.

1 Q But based on what she was having to do and the things she was saying, did
2 you understand there appeared to be then resistance from the President to saying
3 something stronger?

4 A No, not from my perspective. That was just looking at tweets that were
5 going out later.

6 Q When you say tweets, whose do you mean and what were you seeing?

7 A The tweets you just showed me. Like those tweets as they went out later
8 and later and things were continuing.

9 Q All right. So Ms. Trump was monitoring, seeing these tweets, she knew
10 what was going out?

11 A Yeah, but not next to him. I mean, she could just see.

12 Q Did anybody else ask Ms. Trump, to your knowledge, to come down and
13 weigh in with her father about putting out a stronger statement?

14 A Mark Meadows at one point asked her to come down. I don't know -- he
15 didn't -- when he asked her to come down, he didn't say anything about a statement.

16 Q He came up personally to get her from her office?

17 A I don't remember if he came up or he called.

18 Q But this was after Mr. Herschmann had brought her down the first time?

19 A I believe so.

20 Q And so what, if anything, do you remember Ms. Trump telling you about her
21 subsequent interactions with her father? You said she recommended he put out the
22 video statement. What did she say about that and anything else?

23 A That he was filming a video statement to be put out.

24 Q Did she help him craft the words he was going to say in that statement?

25 A I don't know.

1 Q But she told you that she had recommended to him to put out the
2 statement?

3 A She told me that he would be doing a video statement.

4 Q Understood. Did she -- but did she also tell you that she recommended he
5 put out a statement?

6 A I don't remember.

7 Q So were you with her when the video statement was posted? In other
8 words, she was able to watch it with you or --

9 A What time was the video statement put out?

10 Q It's on the next page. I can show you.

11 A Okay.

12 Q It was at 4:17 p.m. So that's page 5 of exhibit 1.

13 A I don't remember if I was with her when this statement was put out.

14 Q Did you discuss with her after she had seen the statement what her reaction
15 to it was?

16 A No.

17 Q Do you remember what your reaction to this video was when you saw it?

18 A I think I only watched it once, so I don't really remember my reaction.

19 Q In the video the President did tell people to go home, but he also said words
20 to the effect that people at the Capitol were special people and that he loved them very
21 much.

22 Do you remember the words the President used like that being something you
23 discussed with Ms. Trump, whether that afternoon or after January 6th?

24 A No, I don't remember discussing those words with her.

25 Q Did you ever discuss with her after January 6th her reaction to this video?

1 A No.

2 Q Did you know -- is it right that day that Jared Kushner was traveling back
3 from Saudi Arabia?

4 A Yes.

5 Q And that he came to the White House that afternoon at some point after he
6 had arrived back?

7 A I did not know that.

8 Q So no interaction with him that day at all that you remember?

9 A I interacted with him later in the evening.

10 Q And what was the nature of that interaction? Did it concern the events
11 that had happened that day at the Capitol?

12 A No, it was purely -- my car was at their house. So when I went back to their
13 house, I saw him for a couple minutes.

14 Q Throughout the attack on the Capitol, we know that people were reaching
15 out to Ms. Trump by text or phone call about whether her father would put out a
16 statement or a stronger statement.

17 Did she talk to you about the people who were reaching out to her?

18 A I had her phone at some -- a few different times. So I saw calls coming in
19 and texts coming in.

20 Q And who do you remember reaching out to Ms. Trump during that time?
21 Were there any lawmakers?

22 A Senator Graham called her phone.

23 Q Did you speak with Senator Graham?

24 A No.

25 Q Do you know what Ms. Trump spoke to Senator Graham about?

1 A I don't think that she spoke to him because she -- so he called her phone. I
2 believe that Rachel picked up because we were standing next to each other. He thought
3 he was talking to Ivanka. I took the phone and said, "Can you hold on one second,
4 please? This isn't her."

5 We walked the phone -- I walked downstairs to the first floor and ran into Eric
6 Herschmann in the hallway and I handed him the phone.

7 Q Did you understand, it sounds like from the tone of Senator Graham's voice,
8 that it was urgent and he wanted to speak to Ms. Trump as soon as possible?

9 A Yes.

10 Q And why did he say he wanted to speak to her, if he did?

11 A He didn't say.

12 Q Did you stay there to hear at least the one end of the conversation?

13 A I heard Eric's end.

14 Q Are what did Mr. Herschmann say?

15 A Something along the lines of, like, "I know. We know. We're on" -- you
16 know, like, "We understand. We're on it.

17 Q What you took to mean from that was that we, the White House, are
18 addressing the situation at the Capitol?

19 A I think so. I think -- I don't think, I know -- at that point lots of people were
20 calling and texting and everyone. And so I just took it to mean, "We're well" -- "I'm well
21 aware of what you're calling about right now. We're doing what we can."

22 Q Did you -- at the time you had that conversation, were you outside of the
23 dining room? Or where were you?

24 A It goes the chief of staff's office, then there's a little hallway, and then there
25 was Jared's office. So right outside Jared's office. Then the next is the Cabinet Room,

1 and then the entrance to the private dining room. So it was before that.

2 Q So you didn't see the President at that time?

3 A No.

4 Q But you understood he was back in the dining room?

5 A I assumed he was back there.

6 Q Did you see him at any time that day in person, that afternoon, after getting
7 back from the Ellipse?

8 A No.

9 Q Who else reached out to Ms. Trump, that you know of, that afternoon about
10 the attack on the Capitol?

11 A I believe at one point McCarthy did. I don't remember any others. I know
12 others did, I just don't really remember who.

13 Q Did you hear Ms. Trump talk about Senator Susan Collins reaching out to
14 her?

15 A Yes, yes.

16 Q So on Leader McCarthy first, what do you recall about or what did you know
17 about what he was asking Ms. Trump at the time?

18 A I don't remember.

19 Q Did you speak to him yourself?

20 A I picked up the phone and handed it to her. We were at this point down in
21 Jared's office area, like downstairs.

22 Q This is after Senator Graham had reached out?

23 A I don't know if Senator Graham or Senator McCarthy was first. Not -- sorry,
24 Leader McCarthy. I don't -- McCarthy. I don't know which one it was, sorry.

25 Q Being in Mr. Kushner's office that afternoon, we do understand that Ms.

1 Trump spent some time there because it was close to where the dining room was.

2 Did you spend a fair amount of time down there with her to help her during that
3 time?

4 A No. I brought the phone down and then took it back upstairs and then
5 went back down. So it was, like, a little in and out. I would say I was probably in there
6 for, like, a total of 20 minutes in some form or fashion.

7 Q And what was the atmosphere or the mood like when you were down there
8 in that area, in and around where the President was?

9 A Upset. I mean, people were upset. They seemed, like, really concerned
10 about what was going on. Somber is not the right word. I'm not -- I don't know the
11 right way to describe it, but, I mean, visibly upset.

12 Q And was there discussion when you were down there about whether more
13 needed to be done in terms of a statement by the President they heard other people
14 talking about?

15 A Yes. I mean, people -- yes.

16 Q All right. Who did you hear talking --

17 A At some point, I don't remember, I was just going to say at some point -- my
18 personal philosophy after working for there for 4 years is, like, you just don't need a lot of
19 bodies standing around.

20 So at some point, I just went back up to my office, because it's not like I'm drafting
21 anything or talking to him. And more bodies doesn't make more productivity, it just
22 makes more bodies.

23 Q Who were the people, though, who were around while you were down in
24 Mr. Kushner's office? You've already talked about Mr. Herschmann.

25 A I just remember Eric and Ivanka. I don't remember anyone else being in

1 there.

2 Q And what was Mr. Herschmann saying that you heard about what was being
3 done, and what, if anything, more needed to be done?

4 A I don't remember.

5 Q So we talked about, in your words, McCarthy, Senator Graham, Senator
6 Collins. Do you remember anybody else who reached out, lawmakers or otherwise, to
7 Ms. Trump while the attack was ongoing?

8 A No. I know others did, I just don't remember who. I mean, I just don't
9 remember.

10 Q Do you remember what time you left that day, left work? There was a 6
11 p.m. curfew in the city.

12 A I would say probably around, like, 5:45, I would guess.

13 Q So after the President issued the video statement at 4:17, but before you
14 left, did you have any further conversation with people about whether the President was
15 doing anything more to address the situation at the Capitol? Was there any continued
16 discussion along those lines?

17 A Not that I was involved in or aware of.

18 Q And was Ms. Trump back up in her office after --

19 A Yeah.

20 Q -- after the video was released?

21 A Yes. But I don't --

22 Q And do you know was she there?

23 A I was going to say I don't think she was down there during the video filming
24 or anything. So she may have been up at her office before then.

25 Q Now, you talked earlier about a statement that you helped start crafting for

1 Ms. Trump to put out on her own before Mr. Herschmann came. And we're aware that
2 Ms. Trump did put out a tweet at some point that afternoon. Was it the one tweet that
3 you remember going out? Is that right?

4 A Yes.

5 Q Okay. And I think within the tweet she said something to the effect of
6 patriots or American patriots, and that received some backlash pretty immediately. Do
7 you remember that?

8 A Yes.

9 Q Okay. So were you involved in dealing with that backlash with Ms. Trump
10 and how to respond?

11 A Yes.

12 Q So can you just tell us about what that was like, what those conversations
13 were like?

14 A We drafted the tweet. At some point in that timeframe of drafting or
15 starting to work on it she was taken downstairs. I continued to work on the message.

16 At some point she came back up, saw it. And there was so much going on.
17 Everyone was really upset. She essentially just said, like, "Get it out." Like, "Let's get
18 this out."

19 We put -- we sent it out. And then she went back downstairs. She came back
20 out and she could see on Twitter that it was not being well received and immediately
21 deleted it and clarified, I believe it was to Kate Bennett, because Kate Bennett called her
22 out on it.

23 Q Okay. Well, I can read to you the tweet that was sent out and see if this
24 rings a bell. "American patriots, any security breach or disrespect to our law
25 enforcement is unacceptable. The violence must stop immediately. Please be

1 peaceful." Does that sound right to you about the tweet?

2 A Yeah.

3 Q Now, the term "American patriots," did you recall any discussion about using
4 that term and including it in the tweet before it went out?

5 A Yes.

6 Q And why was the decision made to include that language?

7 A I'm not sure.

8 Q Were those words you suggested or were those words that Ms. Trump came
9 up with?

10 A I'm not sure.

11 Q She in that tweet says explicitly, "The violence must stop immediately," a
12 more forceful statement than what was in the President's tweets up until the 4:17 video, I
13 think. Is that fair?

14 A What time was her tweet? I'm sorry, I don't --

15 Q It was at 3:15 p.m.

16 A Yeah.

17 Q It's fair that she was more forceful in her statement than what the President
18 had said to that point?

19 A I guess.

20 Q Was that something that she wanted to make clear in her tweet, the words
21 that, "The violence must stop immediately"?

22 A Yeah. I mean, she just wanted to make clear, like, she was not okay with
23 what was going on. I mean, we started drafting it probably 30 or 40 minutes before it
24 went out, but then she was getting brought downstairs. So I think probably in that time
25 period things escalated outside.

1 Q And she actually -- I don't know if I have the term right, but the tweet, it
2 either retweeted or quote tweeted her father's statement at 3:13, just 2 minutes before.
3 Does that sound right to you, that she was adding on to what he had said?

4 A Yeah. Probably, yeah.

5 Q Yeah. And that, the one that she added onto, was -- we can look at. It's
6 exhibit 1, page 3. We can bring that up. Page 3 we're going to look at. Okay.

7 Do you see that there in front of you?

8 A Yes.

9 Q And I just want to again focus on the "stay peaceful" language. Ms. Trump,
10 she never discussed with you specifically about that and her role in having those words
11 included in the tweet?

12 A I think, like I said, I don't remember if she discussed it or not, but that sounds
13 like her. I mean, I've written enough with her and for her that --

14 Q And that's the President's tweet. And to your knowledge, did he have a
15 larger Twitter following than Ms. Trump had?

16 A I would suspect yes. I'm not -- I wasn't really on -- I mean, I only joined
17 Twitter, like, 3 years ago. I'm not very good at Twitter. So I would suspect he has
18 more followers or had more followers than her.

19 Q And given that the President had put out this tweet, the "stay peaceful"
20 tweet, and then what Ms. Trump sends out afterwards, why was there a need to send
21 anything out at all, did you all discuss that, given that the President had sent a tweet?

22 A I think people -- I mean, people were calling, asking for her essentially to say
23 something. I don't know. We didn't really get into the discussion of it. It was such a
24 back and forth and a lot going on day that I don't -- we didn't get into a discussion of
25 tweet or not to tweet.

1 Q In describing how you first became aware that something was wrong at the
2 Capitol, you mentioned a text message you received from your husband to the effect of,
3 "Are you okay?"

4 A Yeah.

5 Q Not interested in seeing the substance of your communications with your
6 husband, but do you happen to have that so you can look at the time? Would that still
7 be your phone that you could just check to see?

8 A I don't actually think so. I don't think so.

9 Q Would you mind looking? If it's not there, it's not there. But is that
10 something you could look at just to see?

11 A But I don't have my phone with me.

12 Mr. Benson. Can you hold on a moment?

13 [REDACTED] Sure, Mr. Benson.

14 [Discussion off the record.]

15 Ms. Radford. So the phone that would have those text messages, I got a new
16 phone in December of 2021, because my phone shattered. So the phone that would
17 have those text messages on it are at my house in Dallas, that phone is at my house in
18 Dallas.

19 BY [REDACTED]

20 Q Not to get too technical, and, again just trying to, as we do with anybody,
21 just to nail down timelines, was it an iPhone that you were using?

22 A Yes.

23 Q And you still use an iPhone?

24 A Yes. But for some reason, and I just know this because of something else
25 I've been dealing with with my kids, none of my -- like, none of my messages from my old

1 phone transferred to my new phone. So they don't know if it's because my phone was
2 set up on two different messaging accounts. So I still have that phone, but I don't have
3 it with me.

4 Q Does your husband still have his phone?

5 A Probably.

6 Q I'll follow up with Mr. Benson. But we would appreciate, again, just about
7 the timing of the message and not the content or any -- of your private communications
8 with him. But I'll follow up after this, if that's okay, if he could check.

9 A Yes.

10 Q If he has it, he has it; if it he doesn't, he doesn't.

11 Mr. Benson. We'll take it under advisement.

12 [REDACTED] Thank you.

13 Other than that, let me just stop there and ask if -- I only have one other colleague
14 who is on, [REDACTED], if there are any questions he has. He's not chimed in.

15 So let me just check my notes really quick.

16 Ms. Radford, I don't have anything further. I just want to say thank you for
17 taking the time. And it sounds like you may have traveled to be with Mr. Benson in New
18 York. So the time and expense, we appreciate it.

19 We'll end for the day. I'll follow up with Mr. Benson on this one small issue, but I
20 don't think we'll have a reason to further impose on your time.

21 Ms. Radford. Thank you.

22 [REDACTED] Thank you. Take care.

23 Mr. Benson. Bye-bye.

24 [Whereupon, at 4:15 p.m., the interview was concluded.]

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Certificate of Deponent/Interviewee

I have read the foregoing ____ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

Witness Name

Date