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

INTERVIEW OF: KATRINA PIERSON

Friday, March 25, 2022

Washington, D.C.

The interview in the above matter was held via Webex, commencing at 10:02 a.m.

Present: Representative Luria.

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Appearances:

For the SELECT COMMITTEE TO INVESTIGATE THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

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For KATRINA PIERSON:

DAVE WARRINGTON
MICHAEL COLUMBO
GARY LAWKOSKI

[redacted] We'll go on the record. Good morning. It is 10:03 in the morning. 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.

At this time, Ms. Pierson, could you please state your full name and spell your last name for the record?

Ms. Pierson. Katrina Pierson, P-i-e-r-s-o-n.

[redacted] Thank you. This will be a staff-led interview, and members, of course, may choose to also join and ask questions. My name is [redacted] I'm a senior investigative counsel. Joining me by Webex from the staff are [redacted], an investigative counsel. And also with us is Mrs. Luria. Thank you for being here.

At this time, you have several lawyers with you today. If you could -- I'll ask your lead lawyer, Mr. Warrington, if you could please introduce everyone for us.

Mr. Warrington. Yeah. David Warrington, W-a-r-r-i-n-g-t-o-n, counsel for Ms. Pierson. Also with me from my office are Michael Columbo, C-o-l-u-m-b-o, and Gary Lawkoski, L-a-w-k-o-w-s-k-i.

[redacted] Great. So before we start, I'll go over a few just ground rules to help things go smoothly. The first is that we have court reporters who are with us today joining by Webex, so they'll be transcribing what we're talking about. Please -- so please wait until each question is asked either by me or someone else before you begin to answer your question, and we'll do the same to wait until you're done before we ask our next question.

The reporter can't record nonverbal responses, and so things like shaking your head and nodding your head won't pick up, so excuse me if I have to break in and ask you

to say yes or no at some point. Also, there might be people or things we talk about that we'll just need to spell so the record's clear, and so we might have to take breaks to do that.

We ask that you provide complete answers to the best of your ability based on the best of your recollection. If a question is not clear, just let us know. Happy to rephrase it so it's clear for you. And if you don't know the answer, just say so.

If you need any breaks, just let us know, whether for comfort or to talk to your lawyers. And if you do need to talk to your lawyers, we can all go off video and go on mute so you can meet in private. And if you'd like to take a lunch break today, just let us know and we can certainly accommodate that.

Throughout the deposition what we'll do, as I think you've seen before, is we'll put exhibits up on the screen, and so they'll flash up and hopefully you can see them there. We also provided access to them last night through a Dropbox for you and your counsel. But you take as much time or as little time as you need to familiarize yourself with a document before you start to answer. And we're happy to zoom in and zoom out, however you direct, so you can see any part of it.

So we'll try it out right now with exhibit 1. So if we could please put that on the screen.

Okay. And just want to make sure, can you see that okay?

Ms. Pierson. Yes.

[redacted] Okay. Great. So that's the subpoena that the select committee issued to you. So as long as you can see that all right, then that's about the way it'll be displayed for other exhibits today.

Mr. Warrington. [redacted] just to let you know, if you have -- if you're using the exhibits that you sent to us, we also have a large screen that we've set up, that if for some

reason we can't read it on the Webex screen, we'll pull it up on the larger screen.

[redacted] Perfect. Perfect. I appreciate that.

So, last, as we tell all witnesses, just want to remind you that it is unlawful to deliberately provide false information to Congress and that to do so could result in criminal penalties. Do you understand?

Ms. Pierson. I do.

EXAMINATION

BY [redacted]

Q So we met in November for an informal interview, which we appreciate you taking the time to do, so much of the questions we'll talk about today will overlap with that, Ms. Pierson, and so apologies on the front end. But as I said before we started on the record, our goal is to be as efficient as we can, and so we'll try not to cover everything. But I imagine when you met with us that everything you told us was to the best of your knowledge and as truthful so far as you know?

A Yes, that's correct.

Q And even though we asked you last time, I'll just ask now, if you could just give us an overview of your higher education and your early career path before you got into politics.

A Sure. I graduated from the University of Texas in Dallas with a degree in biology. Also studied for psychology [inaudible] medical school. And from there I worked in healthcare for about 14 years, ultimately ending as the operations administrator for a level I trauma hospital in the neurology department.

Q If I could stop you right there, and thank you for that.

[redacted] Dave, the microphone is going a bit in and out with Ms. Pierson. I don't know if other people hear it, but if you could pull it closer, it would probably work

better.

Ms. Pierson. Is that better?

[redacted] It is. It is. Great.

BY [redacted]

Q So you were a trauma -- a level I trauma hospital.

A Operations administrator for neuroscience, yes, in my previous life.

Q In your previous life. So when did you come to be in your current life? What started that?

A 2008, '09 time period, I got very involved with grassroots politics in my home State of Texas, where I started volunteering for local, State, and Federal candidates, ultimately earning recognition from the State legislature, being honored by the Senate resolution in the State of Texas, then moved on to become one of the original founders of the Tea Party movement, which I'm sure you're all familiar with. And that just led to more and more engagement. Ultimately started my own consulting firm doing communications in the political realm and some in the private realm, which led me to doing a lot of national media across all networks globally essentially, and met Donald Trump and he became the first official campaign that I joined.

Q And your consulting company that you've had this whole time, is that PCG for Pierson Consulting Group?

A Yes, that's correct.

Q And when did you first start to see President Trump, or not yet President at the time, but come across him in your work in the grassroots, do you remember?

A It was about 4 or 5 years prior to his entrance in the political arena. He was speaking at Tea Party rallies. One specifically I recall was in the State of Florida. So he had been in the grassroots for some time prior to running for office.

Q And what was the reception that you observed to Mr. Trump at the time from the grassroots?

A He resonated very well. I think that's why the base latched on when he began running for President, because he had been to some of these organizations, some of these meetings. And I finally personally met him at a similar Tea Party meeting in South Carolina in 2015, where I --

[redacted] If you could hold on. Dave -- I apologize, Ms. Pierson, the audio just cut out entirely -- I don't know if you have another option with the microphone.

Mr. Warrington. No, I don't have another microphone. Let me check here.

BY [redacted]

Q Okay. Well, Ms. Pierson, we'll just keep going. You cut out when you said you met him at an event in South Carolina.

A Yes. My first in-person meeting with him was at a Tea Party convention in South Carolina in Myrtle Beach in 2015.

Q And am I right that you were one of the first people with a national presence to get behind him and start working for him when he -- to run for President?

A That's correct.

Q And what drew you to him amongst all the other people?

A Well, what I told him that day was that I felt like he would be the only one that could take on the Republican establishment, the only one that would take on the Democrat establishment, and the only one that would take on the media, and that's why I supported him.

Q So in what role did you support him going forward?

A I did political commentary across all networks, so I was very supportive of his candidacy. And once he finally filed his paperwork, it became a big deal, and there was

a lot of press around him being serious about running. So I continued to do television for him. He eventually started calling me to thank me for my public support.

Q Did you take on an official role with the campaign at some point?

A That would be the end of 2015, September-October time period, when he finally called and invited me to become his official campaign spokesperson.

Q Did you hold that role through the election?

A Yes.

Q And did you go into his administration after he won?

A I did not.

Q What did you do instead?

A I stayed out with the super-PAC that was started with some of the other members of the campaign for a little while, before going back to the campaign.

Q And so for his reelection campaign, President Trump's, did you have an official role?

A Senior adviser to the 2020 reelection.

Q And what were you overseeing in that role as a senior adviser?

A So my portfolio, for lack of a better term, it was more press, comms, and coalitions.

Q And when you say coalitions, what does that mean?

A It is the grassroots outreach support.

Q And what sort of work in terms of the outreach and otherwise interacting with the coalitions and grassroots did you do in that role?

A Really just oversee. Because each department had their own director and deputies and staff, so there were essentially like miniature campaigns within the campaign. But because I had so much experience in running coalitions and networks, I

would help, you know, identify people to serve on the board, come up with ideas to do events, approve events, and things like that.

Q This concept of vetting came up quite a bit when we met in November. What does that mean in the context of coalitions and what you were doing?

A Well, board members had to be vetted to be on the campaign as advisory board members, and all of those individuals were vetted through the RNC vetting before coming back to us. And then if there was someone's vetting that wasn't typical for the RNC, I did have the ability to override that.

Q And if someone wasn't vetted -- I'll ask a basic question -- does that mean they couldn't go out and publicly advocate for President Trump's election?

A Absolutely.

Q Or what did --

A Well, they could do it on their own just not under the campaign banner.

Q And so doing it under the campaign banner, what does that mean? If you take, say, a group that is a third-party group but a coalition you're working with, what does it mean to do it under the banner of the campaign?

A So, for example, in the press they ask you for your chyron, which is the title at the bottom of the screen. Anyone could advocate for anyone under their own banner, meaning if it's a coalition, let's just say there's a group of Christians for Trump and that was their entity, then they could do it under that. But they could not do it under the actual campaign. They couldn't cite that they were with the campaign, only with their group.

Q What were some of the larger coalitions that you worked with that were vetted and approved to appear on behalf of the campaign?

A Black Voices for Trump had an advisory board, Latinos for Trump had an

advisory board, Women for Trump. Oh, my gosh, there are so many coalitions. Workers, cops, lawyers, typical campaign coalitions.

Q And so as part of that work, it sounds like, as you did in your time at the Tea Party at the grassroots, you kept a finger on the pulse of the grassroots movement and people's sentiment pretty well?

A Absolutely.

Q And how would you do that, just nuts and bolts of how you made sure you were aware of how people were feeling and the sentiment?

A Well, having come up and built the movement, I was a part of a lot of, you know, social media groups that you just kind of watched the threads. And people would constantly reach out to me if there were issues, complaints, or needed advice. There were influencers in the movement that I would follow and interact and engage with, so constant contact.

Q This concept of an influencer, was that around as early in the Tea Party or is that a more of a modern, a more recent development?

A Well, that's a great question. But, no, they've been around from the beginning. We've all had our mentors as such and then we just call them influencers now.

Q And when you say influencer then, what do you mean?

A Someone who has a large following, someone who shares your values, someone you respect. You know, when we're doing this back in 2008 and '09, there wasn't really a Twitter that was really pushing everything, and so our mentors became influencers on Twitter, and then now you have these newer Twitter people that are called influencers. But the way that I stayed connected with was following my mentors and reengaging with them, seeking advice and vice versa.

Q As part of your work with the coalitions, was there also a proactive sense of being aware if someone who hadn't come to you to get vetted was otherwise holding themselves out as somehow associated with the campaign?

A There were a lot of people who would pretend to speak on behalf of the campaign, and we would track that. We'd ask them to stop in many cases, but you just can't police the entire internet.

Q Now, when -- after the election in 2020, did you stay on the campaign for a time?

A After the November election?

Q Uh-huh.

A My time ended December 31st.

Q So between November 3rd, election day, and at the end of the year, December 31st, what role were you doing, if it was different, or was it the same?

A So during that time period, there were a lot of coalition members, board members who wanted to stay engaged in the process, follow the constitutional process of challenging the election. And one of my primary goals, one of my primary personal goals was to make sure that our specific campaign people did not get caught up with those who were out there not really carrying our message and kind of going their own route and -- which is something that we've done throughout the entire campaign, making sure that they had clear guidance on what would be approved or what would not be approved.

Q You, yourself, were you -- did you go out and advocate on behalf of the campaign and the President or were you still -- were you strictly doing the oversight of coalitions during this, after the election to the end of the year period?

A I was still advocating. I didn't really do much TV. We did Team Trump

Online, so we would do commentary through the campaign's social media and the Team Trump network --

Q In terms of --

A -- views of the day.

Q In terms of the messaging that was coming, were you responsible for crafting that messaging or was it provided to you by people within the campaign and then you used that and the coalitions would use that?

A The campaign would provide messaging.

Q Were you involved in any sort of fact-checking, kicking the tire, so to speak, on the facts or messaging that was given to you by the campaign?

A No, I was not involved in the fact-checking, but I would also include my own commentary.

Q Understood. So on top of it. But in terms of the --

A Right.

Q -- facts that you would rely on, those would come from the campaign and by whomever was responsible for that?

A Correct.

Q Did you have any visibility into the fact-checking apparatus, the people who were doing it and how they did it?

A No, that was the communications department.

Q And who was that led by?

A At that time, Tim Murtaugh, Jason Miller was there by then, so those were the two that were spearheading the communications.

Q Can you talk about what you saw after the election in terms of the reaction of the grassroots and the coalitions, the people that you were close with and knew best?

What -- how could you describe how they reacted?

A People were furious. They were upset. They felt betrayed and ignored. Most of the complaints that I was receiving were firsthand complaints of being at polling locations or not being allowed to go into polling locations, you know, going to bed Trump winning, waking up Trump losing by tens of thousands of votes that wasn't accounted for.

You know, people like in my home State of Texas, where there's tens of millions of votes that can manage to be accounted for and the election -- called on election night, whereas a handful of counties with a fraction of the amount of people couldn't seem to get their ballots counted and turned in on time.

There were other people calling in from States where they were questioning the extension of mail-in ballots to be received. There were postmark dates being changed. There was all kinds of, you know -- a rational, logical person would be upset about happening.

Q So you certainly sensed that within the grassroots --

A Absolutely.

Q -- right after the election, right at -- from November 4th on?

A Correct.

Q And what -- how would you characterize the sentiment of the grassroots, the base, coming into the election with, you know, with COVID having gone on for 2 years and the restrictions and otherwise, the state of the economy? What would you say about that?

A Well, I think that the emotions were already high, because depending on where you lived, you had a certain level of freedoms that had been removed, and those of us who were in red States had received their freedom back, but you had some people who couldn't even go to church. So it just varied where -- depending on where you

were in the country.

Q And after the election, when it comes to just the composition of the coalitions and the influencers who are out speaking about the issues about the election, was it new people, the same people, or how would you describe that, as opposed to before the election?

A In my experience, it was pretty much the same people. You know, I'm sure there were new people out there, but my focus was on the people that we had already, you know, had invested in and supporting along the way.

Q Were there people who gained more prominence after the election than they'd previously had before the election, you know, influencer types?

A Yes. The more aggressive people, like the Alis and all those guys, they began to get a little bit more prominence because of the language that they were using.

Q And when you say Ali, that's Ali Alexander?

A That's correct.

Q And what concern, if any, did that -- or -- cause for you in your role still at the campaign and coalitions and people out there advocating and potentially saying they're advocating, you know, for or on behalf of the campaign?

A Well, in my experience, what we've done in instances where there have been what we would typically call fringe in the political world, and every party has them, we would do our best to keep our distance from those entities. And so we would warn people not to follow that route and not to retweet those people because they were just very unpredictable. And, you know, what we've also learned, coming up in the last, you know, 10, 12 years of grassroots, is those people tend to ruin it for the rest of us because those are the people that the media would focus on.

Q So contrasting that then, you mentioned earlier Women for Trump. Is that

the group of Amy -- excuse me -- Amy and Kylie Kremer?

A No. There was an official Women for Trump at the campaign, and the campaign asked Amy to change the name of her group because the President wanted to own his name under his coalitions.

Q I see. So --

A Yes.

Q -- the Kremers did have a group, Women for Trump, and then they were asked to and did change their name?

A Yes, they did.

Q And what was the name they changed it to?

A Women for America First.

Q And just briefly, how did you know Amy Kremer and for how long?

A So I have known Amy Kremer over a decade. She too was one of the original founders of the Tea Party movement, so I've known her for a long time. We've worked together for many years. We've done several bus tours together, electing, you know, dozens of Congresspeople, several Senators. So we've had a relationship for a long time.

Q And you're familiar with the fact that after the election in 2020, Ms. Kremer and her daughter Kylie started up what's known as March for Trump in support of the President and protesting against, you know, in their view, a lack of integrity in the election?

A Yes.

Q And one of the events that they did included a rally in -- on November 14th here in D.C., at Freedom Plaza. Are you aware of that event?

A Yes.

Q Did you attend the event?

A I don't think I attended that event.

Q And did you have any role in organizing it or otherwise helping them carry it off?

A I don't remember helping organizing, but we talk so frequently, she may have asked if I knew of anybody that wanted to speak or, you know, if anybody wanted to participate.

Q Did you speak to anybody at the White House, to include President Trump or anyone else, about White House involvement with the event?

A With that particular event? No, I don't recall.

Q Are you aware that President Trump did drive by the event in his motorcade that day?

A I am aware, yes.

Q Okay. It's been described as that having quite an impact on the crowd. In your experience, how does a crowd react when the President shows up to an event?

A Very excited. It was a supportive measure in their terms, I'm sure.

Q And if we look at -- we'll bring up an exhibit. I'll show you some tweets. Exhibit 3.

I'll tell you, this is from an archive of the President's tweets, since they're no longer on Twitter, and I'll show you just a couple related to the event. And if we can turn to page 4 to start. There it is.

So on November 13th, the day before, the President tweets: Heartwarming to see all of the tremendous support out there, especially the organic rallies that are springing up all over the country, including a big one on Saturday in D.C. I may even try to stop by and say hello. This election was rigged from Dominion all the way up and

down.

And so the day before, he's referring to the event that the Kremers are having, although not by name specifically. Do you know how he became aware of the event?

A My guess would be Twitter.

Q In your experience, did the President pay attention to Twitter a fair amount?

A Yes.

Q Okay. Now, he comments here about the organic rallies that are springing up all over the country. Is that something you, yourself, were observing during this time period, rallies all around the country?

A In November, I do remember reports, I think, going to their State capitals, questioning their legislatures on how they were handling the certifications or challenges to them.

Q Did Amy tell you at this time that she was in touch with the White House about trying to see if the President actually would come to their event?

A Not that I'm aware of.

Q If we go to page 3, at the top you'll see that the date cuts off, but you can tell by the ones above and below that it's still on the 13th in the evening, so the night before the event. The President actually retweets Women for Trump: So excited to have Congressman Louie Gohmert Texas 1 join us tomorrow for the March for Trump in Washington, D.C.

And the tweet cuts off, but I'll represent to you that's a retweet of a tweet by Amy and her daughter's group.

Were you aware at the time that the President had retweeted Amy?

A I may have seen that. I don't remember.

Q What was the value or the impact if the President, in your experience, would

retweet someone? I mean, for Amy, what did that mean for her and for her efforts?

A It was validation. And he's friends with Louie Gohmert, so that would not surprise me.

Q And in terms of the impact on an event, if the President retweets, just in your experience, would that tend to increase the interest in people who would go or decrease?

A Increase.

Q Now, did you learn after the fact about what I'll, for lack of a better term, call some drama that developed between the Kremers and certain other people who were there during that event on the 14th, to include Ali Alexander and possibly Alex Jones?

A Yes. They did tell me about that, yes.

Q So just in a brief format, what did you understand about -- or what was your takeaway from what had happened that day?

A My understanding was the Kremers, they had the way that they wanted the event to work, and Alex Jones and Ali and that other group had other things that they wanted to take place. And, again, by that time, the rhetoric did not typically match the message they were trying to send, and they just sort of split their own ways. It's my understanding after this event they decided to go separate ways.

Q So, in other words, the groups had all done the event as one coalition on the 14th, but it just didn't go well?

A Correct.

Q And the rhetoric that was not in line, just to be more precise, that you're saying the rhetoric of Ali Alexander and Alex Jones and people associated with them was different than what the Kremers were saying and the message they were trying to get out?

A Yes, that's correct.

Q And different in what way and by whom?

A Well, Ali Alexander and Alex Jones, to no surprise, they are what you would call fringe in the movement and very unpredictable. Whereas, the Kremers were doing what the Kremers have always done, is support the Constitution, and in this case they were doing it in support of the President and election integrity. Excuse me. And therefore, you know, they didn't really go into specific details, other than they were clashing because of some differences of opinions and ideas on how to do things, and that Women for America First decided to not do an event with them anymore and start doing their own thing, which I believe was a bus tour.

Q So they do go out on the bus tour, but they come back on December 12th to D.C. and do another event at Freedom Plaza. Are you aware that the Kremers did that?

A I am.

Q And did you appear at that event and speak?

A Yes. She asked me that night, if I was in town, if I would want to come speak, and I did.

Q Did you have any role in sort of organizing it or putting it together or just you were strictly there to speak?

A When she text me that night and said if I was in town I'm welcome to come, I said, okay, I'll come. And that was it. I did go speak.

Q Now, as you said, the Kremers had decided not to work with Ali Alexander and others by this point. Did you understand there to be other protests in the city that same day on December 12th?

A Multiple, yes.

Q Did that include Ali Alexander and Jericho March with their own stage on the

National Mall, if you knew?

A Yes. I did hear about that, yes.

Q All right. Now, in relation to the Kremers' event, did you interact with the White House, to include President Trump or others, to see if he would appear at the event that day?

A No, not the President. I would likely have asked other people that were in town if they wanted to speak.

Q Do you recall if you did or who you talked to if you did?

A I don't remember, because it was such a last-minute thing for myself even.

Q You're from Texas. I imagine you know Attorney General Ken Paxton?

A Very well.

Q All right. And are you aware that he had filed a lawsuit on behalf of the State of Texas against other States in early December challenging, in effect, the election procedures used in those other States?

A Yes, and I thought it was beautifully written.

Q And he had actually filed a lawsuit with the Supreme Court?

A Yes.

Q Do you recall that the night of December 11th, so before the events on the 12th, that the Supreme Court, I might not get the right term, but dismissed the case?

A I don't remember the date, but, yes, I do recall that happening.

Q All right. So why don't we look then at exhibit 4. It will be another excerpt from the President's Twitter archive, just to ground the discussion about that day. And we'll look at page 3. There we are.

So it works from the bottom up, so I'll just read the two that are highlighted there, Ms. Pierson.

It starts at 12 -- December 12th, but at 12:24 in the a.m., so really carrying over from the night of the 11th and still into the early morning of December 12th. And the President says: So you're the President of the United States, and you just went through an election where you got more votes than any sitting President in history, by far, and purportedly lost. You can't get "standing" before the Supreme Court, so you "intervene" with wonderful States that, after careful study and consideration, think you got "screwed," something which will hurt them also. Many others likewise join the suit but, within a flash, it is thrown out and gone, without even looking at the many reasons it was brought. A rigged election, fight on!

So it seemed consistent that the decision from the Supreme Court came down in and around the evening of December 11th, and that's what the President was reacting to?

A Okay.

Q Fair enough?

A Fair enough.

Q And if we go to -- you know, he says there, "A rigged election, fight on." If we go to page 2, you see that, you know, in the full morning of December 12th at 8:47, you know, in all caps the President tweets: We have just begun to fight, with a lot of exclamation points.

A Yes.

Q And I'll stop there and ask -- well, why don't I -- well, actually, I'll finish out. I'll come back to that one.

If we go to page 1 and at the bottom. All right. So a little bit later on that morning, the President tweets at 9:59 a.m.: Wow! Thousands of people forming in Washington, D.C. for Stop the Steal. Didn't know about this, but I'll be seeing them!

#MAGA.

And then above that, at 1:48 p.m., he retweets Dan Scavino: President -- and gives the President's Twitter handle -- flies over Freedom Plaza in Marine One before heading north to West Point for the #ArmyNavyGame.

So do -- were you there in Freedom Plaza when the President flew over in Marine One?

A I don't recall being there when he did that.

Q But did you become aware that that happened?

A I became aware, yes.

Q Okay. So much like at the November rally, he made an appearance in a way but this time flying over instead?

A That's correct.

Q Did you ever talk to the President after the fact about his appearance at either the November or the December rallies, why he decided to go and -- or how he made the arrangements?

A No, we did not discuss that.

Q And, in fact, he said at his first one that morning, "Didn't know about this." And so the same morning of it appears he didn't -- he wasn't quite aware. But how was -- what was your experience at the -- on December 12th at the rally, just from your own perspective, while you were speaking and otherwise on the street that day?

A I just went to speak and I left, so I didn't stay. But people were -- it was your typical -- I mean, it looked like a Tea Party rally, essentially. People were just there wanting to have their voices heard, you know, gathering with like-minded people that wanted to continue the process of challenging the election.

Q So speaking of voices being heard, you cut out a bit there, so I don't know if

you can lean closer to the laptop. But I think we caught you, unless the court reporter would like us to go over that again.

[Reporter responds.]

BY [redacted]:

Q So the -- that was December 12th. And are you aware that on December 14th, the electoral college, the electors met and cast their votes for the election?

A Yes.

Q And that those -- that President Biden, through that process, got the more than 270 votes he needed to be inaugurated as President?

A That's correct.

Q What, if any, shift was there within the campaign, as you were still with the campaign, was there once that happened? You know, we just looked at the tweets that the President sent after the Supreme Court loss saying he was going to fight on. So what happened then?

A All right. Well, at that point, there were still some State legislators in some areas who didn't feel like their own States had handled their processes correctly, so they wanted to continue to make those challenges. And then following through the challenging of the election process, as I mentioned to you previously, from the way that Rutherford B. Hayes did, they wanted to continue down to -- the final measure would be at Congress.

Q Would be what, I'm sorry?

A Would be at Congress.

Q On January 6th?

A Yes.

Q Okay. So did the -- so the campaign started to shift its focus to the State legislators and then the certification on January 6th, right?

A Correct.

Q Did you have any role in messaging, yourself, on behalf of the campaign once that shift was made between then and the end of your time on December 31st?

A No.

Q And did you notice a shift or observe that the grassroots organizations that had been protesting, that they shifted their focus to January 6th at that time similarly to the President in the campaign?

A Every -- once the news started coming out at the -- they were announcing what the next process would be, it was natural for everybody to shift to what was to be next.

Q And so on that point, if we look at exhibit 5, these are going to be screen shots of tweets. And we go to page 1.

Do you -- what we have here are Kylie Kremer and her Twitter account. And you see on December 16th -- and I'll just go through a few of these just to set the stage -- she says: We have some very exciting news coming soon for the #MarchForTrump.

If we go to page 2, still on December 16th, she says: Our incredible team @AmericaFirstWomen has put on the two largest events that the American people have ever put on for a POTUS. March for Trump has sent shock waves around the world that we the people will be heard. Help us keep fighting.

And down below, if we can zoom in, you see that she makes clear that: After our second massive March for Trump in D.C., we are keeping the buses going leading to our next massive rally January 6th in D.C.

A Uh-huh.

Q So the Kremers, up by December 16th. Like you said, people are focused on the 6th. And here it is, they're saying they're coming back to town.

A Right.

Q Did you talk to them about this plan before they sent it out or soon after, that you can remember?

A I don't remember when they told me they were doing the bus. I remember having a discussion because, prior to the electoral college, which I think it even states on there, through January 20th, prior to that, there were no plans for the 6th until the 6th became the next step, and then they rearranged everything for the 6th. But I couldn't tell you when we had that conversation.

Q Understood. And if we go to page 3, you see Women for Trump is the Twitter handle, and I'll tell you, that's actually still the Kremers' group, even though they had changed the name but it was still under the Women for Trump name, and sending out that they were going to keep rolling patriots, never, ever back down, and that was retweeting Kylie's, and this was also on December 16th.

A Uh-huh.

Q So consistent. And then we go to page 4. We have to do a little bit of math here, but what we see here are a tweet by Mike Coudrey. Now, it's actually on December 19th. That's going to be in reaction to President Trump's tweet that same day that we'll see in a second.

But what Mike Coudrey says is: 2 days ago, Stop the Steal founder Ali announced our coalition was doing a protest in D.C. on January 6th.

And if you go down below that, you see he's re -- I don't know if that's retweeting or resharing a tweet he sent out of Ali's 2 days prior. So on -- if you see that, next to Ali's name, so on December 17th. And you can see down there: Every Saturday every

State capitol, noon, rain, shine, or snow.

And then at the bottom it says: January 5th, Georgia and D.C., January 6th, D.C.

So what Mr. Coudrey was saying was that also Ali and his group was coming back.

So were you aware, at least at this time, that they were going to be coming to town, or is that something you expected given how these things had played out?

A At the time I wasn't aware they were doing January 6th. The last that I knew at that point is they were going to focus on going to all the State capitols, which is why the Kremers decided to do a bus tour instead.

Q Had there been any friction on December 12th between the groups, to your knowledge?

A December 12th. There was one event, I'm not sure which one, but there was a conflict, and I believe it was with Alex Jones, who tried to rush the stage at one of their events, but he was stopped.

Q Well, Mike Coudrey, did you know Mr. Coudrey or know of him?

A I knew of him, yes. I don't know him personally.

Q Who was he working with at the time?

A I don't know.

Q He refers to Stop the Steal as our coalition with Ali. So you don't know whether he was working with Ali?

A I wouldn't be able to verify that.

Q Understood.

A Yeah.

Q So if we go to page 5 of the same exhibit. See, this is the President's first tweet about January 6th and it's on December 19th. And if you can see there, the last two sentences of his tweet says: Big protest in D.C. on January 6th. Be there, will be

wild!

Did you -- do you remember seeing this when it came out or not long after?

A I remember seeing it, yes. I'm not sure when I saw it, but I do remember seeing it.

Q The President doesn't say which, if any, protest or group that he's referring to, just to a big protest and a singular in D.C. wherever on the 6th. Did you make any effort at that time to find out if he was referring to the Kremers, to Ali Alexander, or anyone else?

A No.

Q And at least between the D.C. events, you had seen earlier that he had tweeted one day before the November event and the day of on the December event. This was certainly, I guess, different in a sense that's 3 weeks in advance he's tweeting out that an event will happen. Is that fair?

A Yes. It was all over Twitter, yes.

Q Once he sent it out?

A Well, no, just the fact that everybody was going to D.C. on January 6th.

Q Did you see any reaction once the President said -- sent this tweet to what social media or people in the grassroots were saying about it once he joined in?

A Nothing different other than the fact that everybody was sharing it.

Q If we go on to the next page, page 6, see that on -- if you can see at the bottom, this is a tweet the President sends on December 26th. And I'll just read it: The Justice Department and the FBI have done nothing about the 2020 Presidential election voter fraud, the biggest scam in our Nation's history, despite overwhelming evidence. They should be ashamed. History will remember. Never give up. See everyone in D.C. on January 6th.

And I just say that for context. And one last context is, if we could go to 5A, exhibit 5A, page 3. If you see there in the middle of the page highlighted on December 26th at 7:51 in the morning, so before the President sent that January 6th tweet out, he retweeted Ali Alexander talking about: Our friend, Congressman @AndyBiggsAZ4, has this video message for our Arizona #StopTheSteal rally. #DoNotCertify, #Jan6.

And the tweet was later deleted, as you can see by the red. But did you -- were -- did you become aware at the time that the President had retweeted Ali Alexander?

A I remember that happening, but by the time I went to go verify -- because I had heard about it. I don't remember who said anything. But by the time I went to go look, it had already been deleted.

Q And why had you heard and why did you go to look? Why did that matter to you?

A Because it was Ali, someone who I had already identified as somebody that was on the fringe, and I'm pretty sure you've seen other people with similar concerns around [inaudible].

Q The audio did cut out there. I don't know if the court reporter heard the end.

[Reporter responds.]

Ms. Pierson. Yes. I said that because it was from Ali, which was a concern because we had all considered, we meaning a lot of the senior advisers, had considered him on the fringe, so I assumed that someone around him asked him to delete it or asked Dan to delete it. I don't know who actually retweeted that message.

BY [redacted]:

Q When you say Dan, do you mean Dan Scavino?

A Dan Scavino, correct.

Q And we'll come back to him and social media. But that day, December 26th, is important otherwise because do you remember that's the day that you first heard from Mr. Taylor Budowich about there being a source of funding for the rally on January 6th?

A Was it the 26th?

Q Why don't we look at exhibit 6.

So these are text messages you produced between you and Mr. Budowich?

A Yes, okay.

Q All right. And so I'll -- if we zoom in a -- well, I guess you can see. On December 22nd, Mr. Budowich had reached out to you simply to ask who is --

A Yes.

Q -- doing the Jan 6 rally, and you replied with Amy Kremer's Twitter handle. But on December 26th in the afternoon, at 1:09 p.m., he says: Call me. Have big money for the rally on the 6th.

And you respond back within a few minutes emphasizing that. So do you remember --

A Yes.

Q -- now that's when it happened? Okay.

A Correct.

Q And what I'll show you, because we'll come back to it, are -- it's a bit of a kaleidoscope, but if we look at exhibit 2, these are phone records for your phone number ending in the last four digits of 6822.

A Okay.

Q And we focused on the time period between December 19th and

January 6th. And I'll just take a second to orient you to the way the records look so we can work with them. But on the left-most column it will list the date and time. And important to the time when you look at it you'll see, if you zoom in, there's in parentheses always a notation GMT for Greenwich Mean Time or Universal Coordinated Time, and whether the time reflected is off of GMT or at GMT. And so if it's minus 5 hours, then the time reflected is 5 hours off, and that will come up in a moment here.

But you've got the date and time. You've got the direction, so whether you were calling or someone was calling you. Got the other number you're communicating with, and then the duration, the number of seconds.

A Okay.

Q And then for certain people we highlighted -- we put their names associated with the account and then highlighted in color.

[redacted] And I'll note for the record, Dave, we'll certainly redact all the numbers for privacy purposes, but for now it helps to work with the numbers as we work through this, okay?

Mr. Warrington. Okay.

BY [redacted]

Q But if we -- if you see from December 19th, if we just scroll down that first page, it goes all the way through December 23rd. The only name highlighted is Brad Parscale, who we'll come back to.

If we go to page 2, you see there on December 26th near the top, a few minutes after you emphasize Mr. Budowich's comment, you call Amy Kremer, if you can see that, if we zoom in, and have about a 10-minute long call, and then you call Mr. Budowich.

A Yes.

Q And so did you let Ms. Kremer know that there was a potential for a large

source of funding, it sounds like, before you called Mr. Budowich to find out the details?

A Yes.

Q All right. And at that time, how -- just at a general sense, were the Kremers doing the best they could to raise money at grassroots level to fund their efforts?

A Yes, they were. Taylor and Amy also know each other, so I let her know that Taylor said that he had somebody that wanted to help with the event, and that's how the whole discussion began.

Q And is it right, Taylor had also worked for Tea Party Express like Amy Kremer had in California? Is that right?

A Correct.

Q All right. And Taylor Budowich at this time, what was he doing, do you know?

A I do not know what he was doing at that time.

Q Had he worked in the administration of President Trump?

A I don't think Taylor worked at the administration. He worked on the campaign.

Q Anyone in particular that he worked with at the campaign?

A Yes. He was working with Don Jr. and Kimberly Guilfoyle.

Q And what was his role with them?

A It started out being more advance press and comms, and then he started helping with events and things like that.

Q So you do have your calls with him. And what does Mr. Budowich tell you when you call him about this money for the event?

A He says Caroline has a donor that wants to help crowd build for the President's rally.

Q And when he said Caroline, who is he referring to?

A Caroline Wren.

Q And who is she?

A She was a fundraiser for the campaign.

Q Had she also worked with Mr. Budowich and Ms. Guilfoyle in the past?

A Correct.

Q Now, it's a small point, but I think it matters for your own schedule. You'll see there the times on the calls are taken on December 26th are GMT minus 5 hours, which is East Coast time. Were you in the D.C. area the day after Christmas, to the best of your memory, and then returned to Texas maybe the next day, when it switches to -- you'll see on the 27th it moves to Central Time?

A The 27th is when I flew home.

Q All right. Okay. So how much did Mr. Budowich say Caroline had for the event, if you remember?

A I don't remember if any specific numbers were out there. This was more of a is it going to be possible for the Kremers to work with Caroline, because I didn't know much of the back story at this point and who all was involved for that matter. That's what that discussion was about. But Taylor and I also discussed a ton of other things as well.

Q So then if he -- he wanted to check, you said, whether the Kremers could work with Caroline?

A Correct. Because he wanted to know who had the permits. And then I talked to Amy about it and that's when she first explained to me that they had the permits for the 5th and the 6th. And I got back with Taylor to let him know what she had just told me about how they were initially going to be approaching January 6th

events.

Q Fair to say they were going to approach it the same way they had done the November and December events at Freedom Plaza portion and then to go up to the Supreme Court?

A Yes.

Q And so what role, if any, did Taylor ask you to play in that? He knew Amy himself. I mean, why did he call to talk to you instead of just her?

A Well, I don't know the full story, but I don't know if the split from Tea Party Express was amicable. I mean, they had to work directly together, whereas I was on the outside. But they both felt comfortable working with me, and so I think Taylor came to me because she and I were friends and I could be that intermediary for them.

Q Did Mr. Budowich give you any indication whether -- of who the donor was at this point?

A Not at that point, that I can recall.

Q Okay. At any point did Mr. Budowich talk to you about who the donor was or did you learn it from someone else?

A I don't think Taylor and I discussed who the donor was. Caroline is the one who mentioned it to me who her donor was, but not by name specifically early on.

Q Have you learned at the time or have you learned since that the donor's name is Julie Fancelli?

A Yeah, I learned since that the name was Julie Fancelli. And when I heard the name, I went back into my documents and realized that I had the name inside a folder but never had looked at it.

Q Did you, yourself, ever talk to Ms. Fancelli at any point?

A No.

Q And did Mr. Budowich ever tell you whether the idea to provide money to crowd build for the President's events was one that Ms. Fancelli herself came up with, or was it a -- an idea that was brought to her by Caroline?

A I don't recall specifically. The way that Taylor approached it with me was just that, you know, Caroline has a donor, which is not unusual considering we had all worked together for several years.

Q Now, did Taylor discuss with you at that time whether President Trump would be appearing at the events and whether the White House apparatus would be involved, given the President's tweets about see you in D.C.?

A No.

Q Did you -- so this is December 26th. You get this information. We can look at your phone records if we just slowly scroll down. You do talk to Amy on the 27th, which we'll come back to, you saw above. But otherwise, you don't speak to Caroline Wren or Taylor until December 30th. Do you see that?

A Yes.

Q And you said you just -- you flew home to Texas on December 27th. Is that right?

A Correct.

Q And you had mentioned when we met in November that I think, you know, you had a lot going on in your life at the time with the passing of a loved one and a physical injury. Is that right?

A Yes. My aunt died a few days before Christmas, and then I injured my back doing things I shouldn't have been doing.

Q And so at least for these few days, it seems like you were relatively at home and taking care of family business and yourself rather than involved in the rally at all. Is

that fair?

A That is fair.

Q Now, on December 27th, and we're going to get to the calls with Ms. Kremer, but the President does tweet again about the event. And if we look at page -- on exhibit 5, page 7.

All right. So this is at 5:51 p.m., that's Eastern, on the 27th. You know, much like his earlier tweet, "See you in Washington, D.C., on January 6th. Don't miss it." But here he says, "information to follow," whereas before he hadn't referred to any sort of information coming out.

Do you remember seeing this tweet on the 27th?

A I do, yes.

Q And what, if anything, stood out to you about the fact that the President was saying this at this time?

A This was the first that I heard of him saying that he was essentially going to be there.

Q And why did that matter to you?

A Because I hadn't heard about it and I thought that was interesting, but that also let me know that, you know, whatever they -- anybody was planning was definitely going to change.

Q So on that point, we can show you in exhibit 9 -- and as I said, you saw the President tweets that at 5:51 p.m. On December 27th at 7:16 p.m., this is a text message from you to Mark Meadows, the President's chief of staff, with an update on the March for Trump tour and a list of dates.

Did you text that to Mr. Meadows?

A Yes.

Q And the last date, you can see if we scroll down, is Wednesday, January 6th, Washington, D.C. Is this the schedule for the Kremers' tour?

A Yes, that is their bus tour.

Q Why were you sending this to Mr. Meadows, you know, less than 2 hours after the President's tweet?

A I sent that text message to Mark Meadows and probably Jason Miller because he was head of comms, and it was unsolicited, because in the nature of what I had done for the campaign previously, I always kept senior staff involved of what outside efforts were going on via coalitions.

Q Fair enough. But I imagine the important point was they were going to be there on January 6th in D.C., the Kremers that is?

A Yes, I mean, everybody was. It was all over Twitter, yes.

Q And was this any part of an effort to see if the President would be affiliated with the Kremers' group as opposed to who everybody else was that was going to be there?

A No.

Q Well, if we look then at -- we'll get to Jason Miller, but did you talk to Mr. Meadows right after this on the 27th about this? We don't see a response from him and nothing in your phone logs.

A No, I don't think I spoke to him until I started raising red flags.

Q So if we look at exhibit 11, this is a text message you produced and to a group, Taylor Budowich and also Andy Surabian, S-u-r-a-b-i-a-n, and we'll talk about min in a moment. But also on December 27th at 6:17 p.m., looks like you send them the exact same schedule for the Kremers' bus tour. Is that right?

A That is correct.

Q All right. So who is Mr. Surabian?

A Andy Surabian is one of Donald Trump, Jr.'s political advisers.

Q And how long had you known him for?

A Same as Taylor. They -- he worked on Tea Party Express as well.

Q Why were you sending this to -- including Mr. Surabian on this text?

A So that he was aware of what was going on outside as well. Again, this was one of those unsolicited text messages that people would know what was going on. He also had access to a lot of people whom they wanted to have participated, and this was my way of showing the events where I felt were okay for people to attend, because at the same time, there were other events that were happening across the country at capitols and otherwise that I didn't feel were safe, for lack of a better term, just because the people who were running them we had put up, we had vetted. And we just really wanted to make sure that the people who were out there supporting the President and this effort were going to legitimate events.

Q And so included within those legitimate events would've been the event on January 6th that the Kremers would be holding in D.C., right?

A That's correct.

Q All right. So similar to when you sent it to Mr. Meadows, if the President was going to appear at an event, that was a message that you were putting your stamp on this and that this was an event that could be, for lack of a better word, safe for him to associate with. Is that fair?

A Yes, that's fair.

Q And so one of the people that Mr. Surabian, you said -- well, the one person you said he's an adviser to was Donald Trump, Jr. Did you have a sense that maybe Don Jr. would also potentially attend and speak on the 6th?

A If he wanted to, yes.

Q All right. And then if we flip to exhibit 12. As you said earlier, and this was produced by you as well, on December 27th at 7:15 p.m., so around the same time as with Mr. Meadows, you text the schedule to Jason Miller in two texts, update for March for Trump and then the whole schedule.

A Okay.

Q So why did you text this to Mr. Miller particularly?

A Because I knew he was running comms, and so when you're running comms, you get a lot of inquires from press. So I wanted him to be able to see that if any other events were coming -- as incoming to them, that he would know that these particular events were being put on by people that he knew and knew how to do events, whereas if any others were coming in, he could do a little bit deeper dive and try to figure out who the people were.

[11:03 a.m.]

BY [redacted]:

Q Right. Well, speaking of people he knew, if we go down on this page to 7:20 p.m., Mr. Miller responds within a few minutes.

Good stuff. This is still Amy Kremer and Ali Alexander? Just keep in mind, POTUS is in Dalton, Georgia, at 7:00 p.m. on the 4th.

So we'll put the run-off rally to the side, but it appears here Mr. Miller knows who Amy and Ali Alexander are. Is that right?

A Correct.

Q And I imagine that was expected, given his role in communications and otherwise keeping a finger on the pulse of the electorate?

A Yes.

Q And to your knowledge, was Mr. Miller someone who, like yourself, was monitoring social media to make sure he was aware of what was going on there?

A I don't know if he was or wasn't.

Q If we flip to the second page, you respond back to Mr. Miller: Ali is not affiliated with this.

He responds -- I'll just read these.

He says: Gotcha.

You respond: For obvious reasons. LOL.

And Mr. Miller says: I had to ask, with a smiley face.

How did you interpret the fact that Mr. Miller said that he had to ask?

A Just because he wasn't sure.

Q Uh-huh. Uh-huh. But why --

A And again, to my earlier point, you know, when I sent them that list of events, that meant these are events that are legitimate events but because Ali and the Kremers and all of them were in this hodgepodge early on, I think that was his way of clarifying that they were completely separate now.

Q And important to him and his role for the reasons you're saying, at least so far as you know, to not be affiliated with Ali Alexander or at least to be --

A Correct.

Q Okay. So why don't we -- this is as good a point as any. We've talked about Mr. Alexander a fair bit, and I just want to address him now.

When we met in November, you talked about your opinion of him based on your observations as raising four concerns for you. And you tell me if this is right or wrong.

One is that he's difficult to work with, just as a personality.

Was that one of the reasons?

A Yes.

Q Two was that he had prior convictions in his past. I think he's an ex-felon. Is that right?

A Yes.

Q Three was that in your view, he's a grifter, that is, someone who uses his political activity for personal gain.

A That is correct.

Q And then the last is you said you were concerned, as you've now said this morning, with his inflammatory rhetoric and the civil unrest that could come with it.

A That's correct.

Q On the grifter issue, what, in particular, were you concerned about?

A There were concerns raised by others that he was fundraising and the

money was going directly into his personal bank account and that is a problem.

Q Problem for him or problem -- why would that matter to anybody else? If he's taking it, what's the problem to you or anyone on the campaign?

A Well, it's illegal. And if, you know, there was any association with him, then my understanding would be that it could be assumed that we were helping to put money into his personal bank account.

Q And then on the civil unrest issue, again, the language that he was using, you mentioned a few minutes ago that you were aware of incidents at State capitals that were giving you pause. Is that right?

A Yes.

Q In one incident --

A Yes.

Q Go ahead. I mean, there's one incident you talked to us about in November, if you remember which one that was.

A Georgia.

Q All right. And what about Georgia? What happened in Georgia, and why did that give you concern?

A The Kremers mentioned it to me. So I went to look it up. And Alex Jones and Ali Alexander had gone into the Georgia Capitol with some inflammatory rhetoric. There were other instances where, you know, he was calling for civil unrest. I think I even included some quotes in some of my messages that I felt were pretty inflammatory, and we just could not be associated with any of that.

Q And if we look at exhibit 13, it's an article about that Georgia rally that you've just referred to. Bring it up here in a moment. And you see dated November 18th of 2020, so after the election but before your involvement with the rally. And the

headline is: Alex Jones leads Stop the Steal Rally at Georgia's Capital to Protest Election Results.

And I'll just read a few parts of it and just -- and then talk with you about it. It starts off:

"Conspiracy theorist Alex Jones led a Stop the Steal demonstration at the Georgia Capitol on Wednesday amid a manual recount in the presidential election. Footage posted to Twitter by Brendan" -- and I'll butcher his name but -- I think Gutenschwager, "an independent journalist, showed Jones, activist Ali Alexander, and right-wing media personality Nick Fuentes occupying the rotunda of the capitol building in Atlanta, along with supporters of President Donald Trump."

We then turn the page. It's the top of the second page. It starts off:

"Jones indicated he'd be travelling to Georgia during a broadcast of his InfoWars radio program on Monday, according to the watchdog site Media Matters. Jones told listeners that, quote, 'everyone must go to the capitol of Georgia now and you must surround the governor's mansion now,'" close quote.

And then: "Protesters were seen Wednesday waving Trump campaign flags and holding signs that read Stop the Steal."

And then you see a photograph of Mr. Jones and Mr. Alexander in there.

So this kind of behavior by Mr. Jones and Mr. Alexander, you know, surrounding the governor's mansion, going into the Capitol, that's the kind of thing that was giving you pause as you described it?

A Absolutely.

Q All right.

A This was the event that made the Kremers decide to not do protests anymore but to do the bus tour instead, because they didn't want to be seen as doing the

same thing that these guys were doing.

Q Now, another person that the article mentions was with Mr. Jones and Mr. Alexander was Nick Fuentes.

Do you know of Mr. Fuentes?

A I do not.

Q Continuing on with the photograph of Mr. Jones and Mr. Alexander, it refers to -- one paragraph below.

It says: The Proud Boys, a far-right extremist group, were also in Georgia on Wednesday. A video clip posted from Gutenschwager showed Enrique Tarrio, the group's chairman, addressing the crowd. We're going to keep coming out, he said, until something gets fixed. And if they steal this election, we'll be out every day.

Were you aware of the Proud Boys at this time and their connection with the Stop the Steal movement?

A I only heard of them through the media. I still don't know who they are to this day.

Q All right. And then going to the last page, page 3, and to your point, Ms. Pierson, it starts off:

The demonstration in Georgia was not the first time Jones has attempted to boost Trump's allegations of election fraud. On November 5th, Jones appeared at a demonstration outside of a counting station in Phoenix. Speaking into a megaphone, Jones yelled, quote, "You ain't stealing shit, as poll workers tallied votes. Quote, "We don't know how this is going to end. But if this he want to fight, they better believe they've got one," Jones told the crowd in a video posted by Randy Perez of activist group LUCHA Arizona. Quote, "We're not going to fight their little meth-head antifa scum. We're going to take it directly to those scumbag Nazi bitches," close quote.

Again, indicative of the type of inflammatory rhetoric you were concerned about?

A That's correct.

Q And when you talked earlier, Ms. Pierson, you talked about an incidents at State capitals, plural.

And so I just want to ask. Were you aware at the time of clashes between protesters, sometimes violent, at other State capitals that had been happening in 2021 before this one in Georgia?

A I don't know when they were but there was -- there was a few articles that were coming out, people who were upset, who were going to State capitals.

Q So I'll show you a few and see if they refresh your memory. But if we look at exhibit 14, the first one, you see an article dated April 30th of 2020. And I meant to say the year 2020. And the headline is: Armed protesters demonstrate against COVID-19 lockdown at Michigan Capitol.

And if we go to exhibit 15, there's an article from May 14th of 2020.

Heavily Armed Protesters Gather Again at Michigan Capitol to Decry Stay-At-Home Order.

Were you aware that Michigan was one of the places where these events were happening?

A I remember hearing about this.

Q And if we look at exhibit 16, we see on an article on August 26th of 2020, titled: Maskless, armed protesters storm this State capitol building. Why?

And if you go down to the first paragraph underneath the photograph, the first sentence says:

Earlier this week, a group of maskless protesters, many of whom were armed, forced their way past police and stormed the Idaho State House.

Do you remember this happening in Idaho?

A I don't really recall Idaho. I just remember there were several incidents.

Q One that might have rang a bell or been more resonant is if we look at exhibit 17. So this is an article from The New York Times on December 21st of 2020. So this is 2 days after the President's, Be there, will be wild, tweet about January 6th, and just a few days before you're tweeting, you know, Mr. Meadows, Mr. Miller, and others about the tour that will end up in D.C. And the article is titled:

Armed protesters angry over virus restrictions try to force their way into the Oregon State House.

And I'll just read a bit. The first paragraph is:

Armed protesters trying to force their way into Oregon's State Capitol Building on Monday were met by officers in riot gear as lawmakers gathered for a one-day special session and the growing tension over coronavirus restrictions in the State.

Then move down to the third paragraph.

Many in the crowd, which included people from far-right groups, carried weapons, wore body armor, or held flags supporting President Trump.

It goes on.

Governor Kate Brown had called a one-day special session of the legislature to address issues related to the pandemic.

And then I'll go to the next paragraph.

Protesters objected to restrictions imposed by Ms. Brown to limit the spread of the coronavirus, shouting about their impact on jobs and schools. Quote, "Arrest Kate Brown," close quote, the crowd chanted at officers. And one person carried a sign, saying, quote, "Politicians are the virus. Revolution is the cure."

And the last paragraph, the last I'll read, the second sentence is:

Many in the crowd yelled that they had long supported law enforcement officers including at, quote, "Back the Blue" rallies but would no longer back them.

Do you remember this Oregon protest happening right on the heels of the President's call for January 6th and at the time you're thinking about planning for the rally?

A I don't know if I remember this specifically. But I do recall having a discussion, to my earlier point today, about, depending on where you were in the country, you were already under a number of limitations based upon the restrictions and the removal of constitutional rights, for that matter, in many of these States, which is what looks like these people are upset about.

Q Understood. But were these the kind of concerns, I imagine, again, when you say not being safe at State capitals, this article captures the types of things you were concerned about with regard to January 6th?

A Yes. People were already upset for a whole host of reasons. And any time you're dealing with a large crowd, you have to take into consideration those sentiments.

Q Now you talked earlier about the tweet on December 26th that the President had re-tweeted of Ali Alexander's and how, by the time you went to see it, it was deleted. And you figured someone within the White House, or close to the President, maybe Dan Scavino, had spoken to him about it.

Can you give us a better sense, to your knowledge, of what Dan Scavino's role was with respect to social media and the President at that time?

A Dan had pretty much served as the social media person. I don't know what else you would call him. He did do a lot of tweets. The President did a lot of his own tweeting as well. That's why I said it may not have even been the President that

re-tweeted or deleted it for that matter. I don't know who did it, but he was definitely in charge of social media.

Q So when you said it might not have been the President who sent the Ali Alexander tweet, did you understand Dan Scavino to have the ability to post tweets from the President's Twitter account?

A Yes.

Q Did you know anybody else who had that authority?

A Not that I'm aware of.

Q And in terms of the type of personalities like Ali Alexander and people like him, as you've described him, was there any sort of, I don't know, affinity, for lack of a better term, between Mr. Scavino and people like that, that you observed?

A I'm not sure. What I can say is Dan didn't come from the world of politics. So, I'm just not sure if he had any of those baseline foundations of people in politics.

Q Guardrails?

A Yeah, exactly.

Q What world did he come from?

A He came from the corporate world with President Trump when he was his golf caddy.

Q Did he have any official role, that is, Mr. Scavino, with respect to the campaign?

A In the first campaign, 2016, he was digital, social media, things like that. But in 2020, I don't think he held an official role at all because he was in the admin the entire time.

Q So he would just liaise with the campaign as necessary and as kind of typical for someone who was in the White House at the time as need be?

A Sure. Correct.

Q In terms of crafting the President's messaging for social media, was he -- he was in charge of that to the extent he could be?

A I don't know that I would say he's in charge. The President is in charge of his messaging, but I don't know that Dan would be in charge of that.

Q All right. If not in charge, was he the President's right-hand man on that, so far as you knew?

A Yes. That's fair to say.

Q All right. You know, if we look at exhibit 18, speaking of social media and the White House, it's a Washington Post article about the social media summit held in July of 2019. Were you aware at the time that this event took place?

A I had heard about it after the fact, yes.

Q And did, to your knowledge, did Mr. Scavino have any role in this event?

A I can't say definitively. But when some of us discussed it, I believe that, you know, he would have helped with deciding who the invites would go out to.

Q And one of those invites, as you can see in the photograph on the article right there, is -- went to Ali Alexander. Did you know at the time that Mr. Alexander was invited to and did attend the social media summit?

A Not until I saw it unfold on social media.

Q And did Mr. Alexander use that to his benefit, so to speak, to try to increase his profile, that he had been invited to the White House?

A Absolutely.

Q And did that give you concern at that time back in 2019?

A Absolutely.

Q So he had been someone on your radar prior to the reelection campaign in

2020.

A Yes.

Q To the intersection of Mr. Scavino and Mr. Alexander, I want to get to something we'll show you written by Amy. But to get there, we need to kind of work through your phone logs just a little bit.

A Okay.

Q We've been going for an hour and 20 minutes. Do you want to take a break for 5 minutes, or should we keep going?

A We can keep going.

Q I knew it. All right.

So we'll look at exhibit 2 and page 2.

Mr. Warrington. One thing we might do, [redacted] I can actually turn -- I can dial in with the phone and see if that works better.

[redacted] Well, I guess Dave is essentially asking for a break, Ms. Pierson. We'll have to accommodate. So, no, why don't we take 2 minutes?

Mr. Warrington. Let me see if that works better.

[redacted] Yeah, why don't we do that? Why don't we just go -- it's 11:20 now. We'll take a pause. And at 11:25 we'll get on, and we'll plow right through, okay?

Ms. Pierson. Okay.

[redacted] Thank you. We're off the record.

[Recess.]

[redacted] All right. It's 11:25. We'll go back on the record.

BY [redacted]

Q Ms. Pierson, we'll turn to exhibit 2, as I said, to look at phone records for

your phone number ending in 6822.

As we pull that up, was that your main phone number that you used?

A Yes. Yes.

Q If we look right there on December 27th, you see at -- it's listed at 9:02 p.m., a call that I've highlighted with Ms. Kremer for -- my math is not great -- but over 10 minutes long. Do you see that call?

A I do.

Q All right. So that's the evening after you've texted Mark Meadows, Jason Miller, you know, Andy Surabian about the tour. I imagine you were talking to her then about next steps?

A It could have been, but it could have also have been her updating me on all the drama that was going on.

Q Sure. There's enough of that.

A Yes.

Q So there's that call. And what I want to then show is -- so that roughly is about 10 minutes. As I said, it started at 9:02 p.m. And so, 10 minutes takes you to 9:12, roughly, and then a few minutes over, so 9:15.

And if we look at exhibit 2A, you had told us in November that you had two phone numbers that you used. One was your main one, but then also you had one that ended in the digit 6896. Is that right?

A That is correct.

Q Okay. So if we can look on page -- these are phone records from Verizon for that phone number. If we look at the bottom of page 2, showing that it runs through December 26th, and then we can flip over to page 4 where it picks up on December 27th. And if we can zoom in on that December 27th, you see there's a call at 9:18 p.m. and

that's to Amy Kremer's number. It's the same number you talked with her on the other phone.

A Uh-huh.

Q And it's for, if you move over the right, if you look at it, you'll see that it's for 40 minutes.

A Uh-huh.

Q And so the question I have is: Do you know why you switched phones to talk to Ms. Kremer after you used your other phone for just a few minutes prior?

A Yes. Typically I switch phones when the battery dies on the other.

Q And this account with Verizon, Ms. Pierson, this 6896, it's in your name, right?

A That is correct.

Q Why did you have a second phone, this second Verizon phone?

A Because I have a personal phone and a public phone.

Q And this 6896, was that the personal or public?

A That's the public phone.

Q And would it forward to your private number, as well, if you received a call?

A Correct.

Q But you could give this out and that would keep distance between -- you give this number out and keep distance between that and your personal phone number, right?

A Correct.

Q All right. So this is as good a time as any to ask about what has been reported now several times in Rolling Stone and picked up other places about the notion that Kylie Kremer and Amy Kremer were using burner phones to communicate with White House officials and maybe even with you.

Do you know what a burner phone is, just as a general matter?

A I watch television. Yes, I know what a burner phone is.

Q So fair to say a phone that you could pick up, say, at a convenience store and not register in your name with the hope being that no one could trace it back to you?

A Yes.

Q All right. To your knowledge did either Amy or Kylie Kremer, at least in or around the time we're talking about, so December of 2020 to January of 2021, have and use a burner phone?

A Not to my knowledge.

Q Did you ever tell them that they needed to use a burner phone to communicate about the rally, whether with you or with the White House?

A No.

Q And did you yourself use a burner phone to communicate with anybody about this rally in December of 2020 or January of 2021?

A Absolutely not.

Q Did Mark Meadows ever tell you to use a burner phone to talk about the rally?

A Absolutely not.

Q To your knowledge, did Mr. Meadows tell either or both of the Kremers to use a burner phone to talk about the rally?

A I don't know that he ever spoke to the Kremers.

Q Did they ever tell you that they had spoken to him about the event on the 6th?

A They told me they had not spoken to him about the event on the 6th.

Q Now, going back to your phone records, so between the two calls on the

27th, you roughly spoke with Ms. Kremer for about an hour. So, and that would have run until -- that last call would have put you at about, you know, 10:00 p.m. central time at least. And so I just want you to hold that. And then we're going to look at text message between Amy and her daughter, Kylie, that you weren't on, but just for context to maybe talk about what you talked to Amy about.

A Okay.

Q So if we look at exhibit 19, these are text messages that Kylie produced through Mr. Warrington. And they're text message with her mom, Amy.

And if we look at, start with page 69, it's going to be roughly in the middle, if we go up to the top half, so starting right there. Go down a little bit. We're just scrolling on the exhibit. Right there.

So you see at December 28th, 2020, at 3:07 a.m., so carrying over from the night of the 27th into the early morning of the 28th, Amy says to Kylie:

Call me real quick.

I'm just going to read these. She says: Scott is still here.

And Amy says: That's fine.

Kylie responds: Okay. Don't say anything.

And Amy says: I need to tell you something.

She says: I won't, but I'm dying to know why you think that.

And then we continue to page 68. The messages don't reference you until you get to right there at the bottom, 3 10:00 a.m.

Kylie says to her mom: Who called you about those people?

And Amy responds: Katrina, two times.

So it's -- we just saw that you had two calls with Amy, right, on the 27th?

A Yes.

Q All right. And then Kylie responds: That she wants people to tweet?

And then she clarifies right away: Speak?

And Amy says: No, that she doesn't want Scavino taking over because then Brandon Straka, Ali, and all the people that have come after us will be on our stage. She said do not let the White House take over our event.

Kylie responds: They won't be.

And Amy says: If Scavino gets involved, they will.

Now Kylie asks: Why is that?

And if you go to page 67, Amy doesn't respond in text. I'm just going to keep a placeholder there and read the last few messages.

If we go to page 56, this is now going to be on December 29th at 8:32 p.m. So if we just scroll down on that page 56 a little bit, right there.

So the next day, Amy picks up on this again and says: I'm really afraid we're being played. I'm extremely concerned about us being played by Caroline and Scavino. Why are they working with Cindy or Ali? I don't want anything to do with either of them. Nothing.

And Kylie responds: Then you need to get on the phone with Yoder or a lawyer.

We'll put that aside.

And Amy says: Why?

And Kylie says: To see how to shut it down.

And Amy responds: I'm not the one working with Caroline.

And then follows up by: How does Ali know about a big announcement?

So I stopped there and pause to say certainly Amy was telling Kylie, after she spoke with you, that you-all talked about Dan Scavino and the White House potentially taking over the protest event on the 6th. Does that ring a bell?

A It does ring a bell because one of the concerns that Amy was explaining to me was that I was hearing all about the rift that she and Cindy had. What is this? December? Yeah, so this is still early on. The rift that she had and Cindy had, all the things that had transpired between them and the other groups, and the fact that Caroline I guess, had positioned herself as someone who was, quote, "working with the White House," although we had not cleared all this up until later.

And then leading from, as we've already seen, Scavino having the social media summit, having Ali there, at that point in time, the assumption was made that Caroline and Scavino were working with Ali, which I learned later to not be true.

Q And so, your advice to Amy was, because that was the working assumption at that time, is that you couldn't have the White House take over because Dan Scavino working with Caroline would then put their people on and their people would not be the Kremers?

A Correct.

Q And along similar lines, if we look at exhibit 7A.

[redacted]. And, Dave, this was not one that I was able to give over before, but it's -- these are -- I'll tell you these are text messages between Katrina -- Ms. Pierson and Mr. Budowich. They're just clearer than the ones produced by y'all for this.

Mr. Warrington. Okay.

BY [redacted]

Q So if we look at 7A, you can see at the top, if we zoom in, Ms. Pierson, so you can situate yourself, you see your phone number, your personal phone number, and then Mr. Budowich's name. And then what he did is he produced text message in chunks. And so, this chunk runs from December 31st of 2020, 9:43 p.m., to January 1st of 2021, to 6:15 p.m. But these are all in, if we go down a little bit to show you, all in universal time.

So you have to take 5 hours off for East Coast. That's by way of background.

But if we look at page -- let's see here -- what would be page 3 of the -- page 4 of the exhibit, at the top, if we zoom in, you see that on December 31st, so New Year's Eve, you're writing to Mr. Budowich in the second sentence of a message at 10:54 p.m. by the time of these:

Besides, we can't have Ali and Alex Jones married to POTUS day. Best option is to redirect to January 5th.

Now we'll get to this in a moment. But there are you talking about how, again, you don't want Ali Alexander and Alex Jones to be affiliated with the President on January 6th?

A Correct.

Q All right. And if we continue on down on that same page until we get to 6:49 a.m. on January 1st, right there, you send a link to Mr. Budowich. If we zoom in, you can see it says it's a Newsmax -- excuse me -- NewsWars link. And do you know NewsWars to be affiliated with Mr. Jones, Alex Jones?

A I thought it was InfoWars.

Q He's got a lot of wars, but I'll read --

A Oh, okay.

Q -- I'll read this one here.

Breaking. President Trump will officially speak at the D.C. MAGA March on January 6th.

Some sort of emoji or something you send, it doesn't reflect here. But Budowich responds:

LOL. Pretty sure the DJT tweet did that, in other words, breaking news.

A Right.

Q And you respond: He did not break that, that he was speaking and Alex Jones doesn't need to be the one -- be one breaking it.

A Can you scroll down some? I can't see that part.

Q Okay. So, again --

A Okay.

Q Do you remember that Alex Jones was -- at least being aware that at this time Alex Jones was going on the air, talking about the 6th and claiming to have inside knowledge of what the President's plans were?

A I am aware, yes.

Q All right. And did that give you pause for all the reasons we've already talked about?

A Yes.

Q All right. So if we go to the next page, your first response after the Alex Jones is that, you know, needs an actual press plan.

Is that a reference to the event, needing a press plan, so that people like Alex Jones weren't speaking out about it?

A Yes.

Q And then your next response is:

Between us, fucking hate Dan Scavino, FYI.

And why at that time -- put aside the language. Why in the context of talking about Mr. Jones were you expressing that sentiment about and linking it with Mr. Scavino apparently?

A What is the date? Okay. That is the day after I spoke with Caroline, and Caroline is the one that mentioned Scavino.

Q So your thought is that she's saying Dan Scavino wanted Alex Jones and

Alexander to be affiliated with the events? So that's what you're expressing --

A Yes.

Q -- frustration about?

A Yes. For the reasons I stated earlier about having those people at the White House summit.

Q We're going to get to -- that's a way to get to Caroline, and you first talking with her. I think you just said you might have talked to her the day prior. This was a text on January 1st. I think we'll show you that it was on December 30th. It may be the easiest way to do that is if we look at your phone records on exhibit 2 and we go down to the first orange line on page 2 right there. On December 30th, do you see --

A Yep.

Q -- almost a, I don't know, half an hour or an hour-long call, I almost should say, with Caroline Wren on that day?

A Yes.

Q And then you start to have calls with her that same day and with Amy and Taylor. So can you just tell us and walk us through your conversation with Caroline, why she reaches out to you, because she calls you, and then how this develops over the next few days?

A Yes. She called me. I texted her and said I'd call her back, and I did.

She reached out to me and said that she was trying to help the President have a good event. She has the donor that wants to help get people there, but everybody was fighting. She specifically cited Kylie and Cindy and all these -- all of these things that she was -- all these issues she was running into.

And she goes, You're the only one that I know that knows a lot of these people. Could you help me try to navigate this essentially?

And I said, Well, I need to figure out what's going on. And that was my first -- that was first time where I really started to try to separate all the pieces and put some of the -- connect the dots essentially.

Q Had Ms. Wren, to your knowledge, been involved in event planning before?

A Other than fundraisers, I was actually kind of shocked that she was helping to, quote, "plan" the grassroots piece of it. But other than fundraising, that was my only association with her until after the fact.

Q Did she then or at any point explain to you more about how she came to raise the money from the donor for the event?

A She did not explain to me how. And I didn't ask, because, again, we'd all worked together for several years. And so, up until that point, it seemed like a regular thing. The President's going to have a rally. Caroline has donors. Who wants to help? So at that point, I didn't raise any red flags until she mentioned Alex Jones to me specifically.

Q We'll get there in a moment. I think that's going to have to do with what she wanted to have speak at the event. Is that right?

A Correct.

Q Okay. But in terms of the -- everybody was fighting, were there essentially two camps that she was describing between who was fighting, or maybe three camps? How was it broken out?

A I would say probably three, but two were kind of the same. But there were a lot more organizations involved that I'd never heard of. But Caroline specifically was trying to navigate with the Kremers, Ali, and Alex Jones, and then there was Cindy Chafian who had split off from the Kremer's group.

Q Can you in a, if you can, just at a -- just in a nutshell describe what the permit

drama was briefly? Because I think that helps explain some of this.

A So, the Kremers initially had the permits for January 5th and 6th. When Caroline got involved, she had mentioned that she wanted to include Ali Alexander, which we'd already discussed that the Kremers did not want anything to do with. That was upsetting to Caroline.

And then something had happened between Cindy Chafian and the Kremers about Cindy having their names removed from the permit. There was something going on with the permits that I was just trying to get caught up on at this point in time. And Cindy was not affiliated with Women for America First and, therefore, could not make changes to the permits. The bottom line was, the Kremers ended up with permits for the 5th and the 6th.

And so Caroline was reaching out to me to try to figure out, how can we bring everybody together to do an event for the President?

Q Those permits at the time, Ms. Pierson, did you understand them to be for Freedom Plaza?

A That is correct, just like the previous events.

Q Do you know how the -- that Women for America First, were you involved in them getting a permit for the Ellipse?

A No, I was not.

Q Do you know how that came to pass, whose idea it was and why that location was settled on?

A I do not. I just assumed that, since the President was going to be involved, Secret Service, and maybe Justin Caporale would know.

Q And so Caroline, when she talked about this to you, the theme she was conveying was that she wanted to get as many people as possible to support the

President? Is that right?

A Correct.

[redacted] All right. And I see Mrs. Luria's on camera, if you had a question.

Mrs. Luria. I don't have any questions right now. I was just listening.

BY [redacted]

Q And so what -- what was the solution, or what did you do to help try to mediate this fighting that was going on?

A I talked to the Kremers about possibly releasing the permit on the 5th, since the President had already said he was going to come on the 6th, as a way so that everyone would have their voices heard and could exercise their constitutional rights. They weren't happy about it. But Caroline seemed agreeable to it, and Cindy seemed agreeable it to. And ultimately, that's what they decided.

The Women for America First would keep their permit on the 6th. They released it on the 5th so that everyone else could have their constitutional day.

Q And so, the Women for America First would be the headliner, or the organizers of the event on the 6th at the Ellipse and that Cindy and others would be able to put on their events on the 5th at Freedom Plaza?

A Correct.

Q Now in terms of the people you mentioned, we have the Kremers. We have Cindy Chafian and Alex Jones and Ali Alexander. Two of the other names that at least seem to pop up in these early discussions about this are Roger Stone and Kristin Davis.

Do you know who Kristin Davis is in relation to Mr. Stone?

A I did not until then. I was told that she was his publicist, I believe.

Q And why were they in the mix at this time?

A So Caroline originally was including Roger Stone in all this, as well. But Cindy Chafian had him -- had Roger Stone also speaking with her group that was going to be on the 5th.

Q And when we talk about, you said that Caroline Wren brought up Alex Jones as someone who's a point of focus for her, why was that? Did she tell you?

A Yes. She said that -- well, she -- first she said that Alex Jones was going to speak.

And I said, No, he's not speaking. He's not getting on the President's stage.

And she said, Well, my donor who's supporting this event wants him to speak.

And I said, Well, you can tell your donor that's not happening.

Q How about Roger Stone? Did Ms. -- did Caroline Wren talk about Roger Stone in connection with her donor?

A Not in the context of her donor. She was just advocating hard for Roger Stone. She was saying things that -- trying to convince me that it was a good thing, saying it's already been approved. It's okay. He's having dinner with the President every night, which I knew wasn't true.

When I asked her flat out had she cleared any of this with the White House, and she said, Well, not specifically. But it's okay. They're all fine with it.

I said, Well, who's "they" and who approved this?

And she couldn't tell me.

Q You said earlier that, you know, in relation to your comments to Mr. Budowich regarding Alex Jones, that Ms. Wren told you Dan Scavino was somehow involved? How did his name come up or come from Caroline?

A During the conversation, when I asked her where's this coming from and she mentioned Dan Scavino's name in passing, I guess to try to convince me that somebody at

the White House approved, and that's what really upset me when I was talking to Taylor about it, because I thought, well, if Dan approved this, now I'm going to have to go and explain to him why all these people shouldn't be in. And then, I mean, I can't override the White House on anything, which is why then I started raising flags to the Chief of Staff.

Q Ali Alexander, did Ms. Wren seem to have an affinity or be pushing for him as well to participate?

A 100 percent.

Q And what was her explanation for that?

A She did not give an explanation other than he's been fighting hard for the President.

Q Did any of this strike you as out of the ordinary for what you understood Caroline Wren's role, you know, role in fundraising, to now be advocating for people like Stone, Alexander, and Jones to share the stage with the President?

A Yes. I was taken aback by it.

Q Now you end up with the stage solution, so to speak, of January 5th and January 6th. But there's this notion of everybody referring to each other as coalition partners. Are you familiar with that as something that was agreed upon between everybody in terms of promoting the event?

A Yes. There was an attempt to try and still present a unified front as far as the support, but I think that broke down as well.

Q So, for instance, if we look at exhibit 35, which is just a picture of the web page for the Kremers' March for Trump site, for the January 6th event, if you zoom in to the coalition partners at the top of the page, you see Women for America First listed, MyPillow. I know MyPillow's not a group. Was that a sponsor for the Kremers, to your

knowledge, or somehow involved?

A Mike Lindell, yes.

Q Okay. And I think you can see that right behind there on the bus the MyPillow logo is there. Did you understand he had given money for their bus tour?

A I knew he was one of their donors, but I just noticed that.

Q Okay. The next entity listed is Turning Point Action.

Are you familiar with that entity?

A Yes.

Q And how were they connected with these events to your knowledge?

A Caroline said that Turning Point was going to help organize the bus tours.

Q Did they receive -- did Turning Point, to your knowledge, receive any of the money from the donor to help make that happen?

A To my knowledge I don't know. But Caroline did say that she was giving them money.

Q The next entity is Phyllis Schlafly Eagles.

Do you know what they are and why they were involved?

A I think that group is actually called Eagle Forum, but I don't know how or if they were involved.

Q Next one is Moms for America.

Do you know who they are and why they were involved?

A I've heard of them, but I don't know them or why.

Q Next is Peaceably Gather.

Does that mean anything to you?

A Never heard of them.

Q After that is Wild Protests. Did you know that to be just the website that

Mr. Alexander had set up or not even that?

A Oh, I didn't even realize that, no.

Q Tea Party Patriots?

A I do know Tea Party Patriots run by Jenny Beth Martin.

Q And without getting into it, a long history with the Kremers?

A Correct.

Q They essentially don't get along well?

A Yes. This is why I think the coalition piece fell apart, because their lawyers had some issue, because I think there's actually still some ongoing litigation there.

Q Then last is Stop the Steal.

Is that -- understood that to be Ali Alexander's group?

A Correct.

Q All right. Now do you know whether Ali Alexander's group got any money from Caroline?

A I --

Q Or through -- from the donor, that is?

A I do not know.

Q How about Tea Party Patriots?

A I don't know.

Q Peaceably Gather?

A I don't know.

Q Moms for America?

A I don't know.

Q Phyllis Schlafly Eagles.

A I don't know.

Q How about Women for America First?

A I do know they received funds for Caroline, from her donor.

Q And I imagine, given the history -- we've talked about it with many of these people and the Kremers -- they weren't necessarily happy to be -- even being listed as coalition partners for this event?

A Yes. They were very upset about it.

Q And on that point, on exhibit 8, these are, right, your text messages with Kylie Kremer. And we'll just go to page 9. Just at the very top, I mean, just to highlight the dynamic here, Kylie tells you, so this is December 31st, in the afternoon.

"We were told by Caroline over and over that the 6th was solely our event. Caroline even told my mom that. They could be VIPs, but they could not be listed anywhere."

And then you go down, at 3:56 p.m., you say: Fact. Can't marry POTUS to those groups.

And Kylie responds: Exactly.

So, again, it sounds like the kind of, as you're saying, the agreement was we can list them on the website. That will be -- that's as far as we're willing to go but they can't be affiliated with the event at the Ellipse on the 6th. That's strictly Women for America First?

A That was the understanding at that point in time, yes.

Q All right. And it sounds like Caroline said a lot of things to a lot of people.

Was that your experience with her?

A Yes, because she told me they agreed to do that. And then I find out that they didn't. And then that's when Amy got upset, because she reminded me that there was litigation between them and Tea Party Patriots. And their lawyers did not like the

fact that it looked like they were working together, and then we'd asked to take that off. And, like I said, it began to unravel.

Q Before your meeting that we'll get to with the President on January 4th, did Caroline ever tell you that she was -- had approval from, you know, Don Trump Jr., or Kimberly Guilfoyle or anyone other than Mr. Scavino close to the President for what she was proposing?

A No, she didn't mention either one of them.

Q All right. Or anyone else other than Mr. Scavino?

A No.

Q All right. Did Caroline ever drop it, wanting these people to speak? Up until the day of the event, did she ever drop urging these people to get on the stage on the 6th?

A Not to my knowledge, because those same people continued to tweet out their involvement on the 6th. Ali even tweeted the night before something in the likes of looking forward to taking the stage with the President tomorrow. So, I'm pretty sure she did not stop telling it. And the fact that she leaked her own list to the press, knowing that I was going to meet with the President the following day, was disturbing.

Q So, despite all the things you told her from the get-go about why these people couldn't speak, she continued to press.

A That's correct.

Q So when we -- if we look at exhibit 21, and as part, again, I imagine you continued to monitor social media to see what was being said by people, as you just said, like Ali Alexander saying he was going to speak, correct? This was something on your radar?

A That's correct.

Q All right. So on January 2nd, at 9:55 a.m., these are text messages between you and Mr. Budowich and Hannah Salem. You send to the two of them an article from the Daily Beast.

If we can zoom in, right there is fine.

And the Daily Beast article, it says: Trump Plans to Fight the Election Even After 'Stop the Steal' Rally Ends.

And below that you pull a quote. "May God have his vengeance on the Hotel Harrington," close quote, Ali Alexander, a lead organizer of Wednesday's rally, said in a Twitter video Monday.

And then you say: Hannah, do we have anyone tracking these comments to make sure January 6th surrogates aren't blindsided?

So a couple of things about Mr. Alexander's quote, and then we'll look at the article, the first being that he's quoted as being a lead organizer of Wednesday, that is, January 6th's rally. Was that true?

A He was not a lead organizer on the January 6th day, though I was told that he had a permit to have a protest at the Capitol on the 6th.

Q And then obviously his quote, May God have his vengeance on the Hotel Harrington, I guess the language, did that give you pause, too?

A Absolutely.

Q All right. So if we look at exhibit 22, it's the Daily Beast article you sent. And the quote that you pull out actually is at the end of the article. So just show you that on page 5. All right. So you get all the way to the end. But I want to focus on some of the stuff in the article itself before that quote. And let's go back to page 3. And if we go to the bottom of that page, the last paragraph, I just want to get your reaction to this.

The January 6th rally comes after two earlier Washington protests in November and December failed to save the election for Trump or stop his campaign's nearly perfect record of courtroom defeats, but the protesters' mood ahead of the January 6th protest has turned even more desperate.

That characterization of the mood, did you -- do you agree with it at that time that was the mood of the people regarding the election?

A I mean, people were upset. I don't know that they were desperate at that point because, again, there is a constitutional process that was taking place and precedent for the vote to be had in Congress. So there was still hope at that time, I believe.

Q If you turn over to the next page, the lead-up to Mr. Alexander's quote, it says:

Trump diehards from across the country have organized their travel to Washington on The Donald forum. One of the hottest topics on the site is how protestors can bring guns to D.C., which would count as a local crime in nearly all circumstances under Washington's strict gun laws. Others have talked about braking into Federal buildings or committing violence against law enforcement officers who try to stop them from storming Congress.

Quote, "I'm thinking it will be literal war on that day," close quote, one popular comment posted last Wednesday read. Quote, "Where we'll storm offices and physically remove and even kill all the D.C. traitors and reclaim the country," close quote.

Then it continues.

Both the November and December rallies in Washington saw violence, especially after nightfall. And that seems likely to be the case this coming rally, too. Proud Boys leader Enrique Tarrio claimed in a post on conservative social media network Parler that

some Proud Boys would dress in black to disguise themselves as left wing antifa protesters.

So, one, were you familiar with The Donald forum that's referenced in this?

A I've never heard of it. I've never heard of that.

Q Were you seeing comments of this sort, though, on social media that you were tracking about January 6th, about the risk of violence?

A I was seeing a lot of this, because there were attacks at the two events leading up to it. So I was very concerned.

Q How about this concept you've talked about at State capitals and Mr. Alexander going in them? Here's a quote that says:

Where we'll storm offices and physically remove and even kill all the D.C. traitors and reclaim the country.

Were you concerned as well that on the 6th, that people could go to the Capitol itself and try to get in?

A I personally did not think people would actually do that.

Q Because why?

A Because that's crazy.

Q But you had seen it happen at other capitals. Why would the U.S. Capitol be different?

A Well, for someone like me who understands that this was the next logical step in the constitutional process, it doesn't make sense to disrupt that process, because the whole purpose was to get to the vote, which they never got to because it was disrupted. So it was counterproductive.

Q And what was your understanding, though, in that constitutional process, since you know politics and follow it, did you believe there was any chance that that

objection process could actually work to overturn the election results for President Biden?

A What I thought it would do was provide the public with the last bit of recourse in following the process to its end. And, like, you know, I liken it to a football game. You know, if there's flags thrown, they get challenges. If a flag isn't thrown and the coach, you know, doesn't call it, if time runs out, the game's over. So for me, that was just the end of the process.

Q But certainly of the process, but the game analogy, you know, you know, someone could score at the last minute and potentially win. But when it came to January 6th, did you understand there being any chance that the election could be overturned in favor of President Trump?

A I don't know that I would use the term "overturn," but I did think there was a possibility that the electors could have been challenged.

Q Challenged --

A Slim, slim, but a chance.

Q Would -- to your knowledge, were there enough votes just in the House to be able to support a vote that would object to enough electors that President Trump could win?

A I'm not sure to the number of votes. But I think that, had we gotten to that process, then I think the people would have felt like the process had come to a full completion, and they might have been able to move on.

Q But certainly, the focus on January 6th was on what was going to happen inside the Capitol that day, right?

A Sure.

Q And on -- at the protests in November and December, fair to say that there

was nothing happening at the Capitol in D.C. that day related to those events. There were no proceedings taking place. Is that right?

A Correct, yes.

Q So if we look at your texts with Caroline at exhibit 20 -- and I'll tell you these were produced by Caroline. They're just in a different format than you produced just kind of in the more native. So it's easier to follow them. So that's why we used them.

If we could go to page 4, so because you're the recipient on this chain, as produced by Ms. Wren, yours show up in -- your messages show up in gray, hers in blue.

On January 2nd, so that same day you sent that Daily Beast article, so if we go back to page -- is it -- yes. That's it. Exactly. Sorry.

So January 2nd, 4:15 p.m., Ms. Wren sends you a list of speakers. And if we could zoom in on the orange section, all right, right there is great.

So even after everything you've told her, the list she sends you lists Ali Alexander and Roger Stone as speakers and that Roger Stone would be introduced by Alex Jones, and Ali Alexander would introduce all the other speakers in that block.

Do you see that?

A I see it.

Q All right. And then your response is right below that.

I just realized this is all on the 6th. Political freak-out. I'll make some edits, and the timeline is off.

So that's how -- that's what you say to her. But what was your reaction in your own mind about her sending you this list now on January 2nd with these people still on there?

A Deal breaker.

Q Pardon?

A Deal breaker.

Q So what did you do?

A I alerted the Chief of Staff.

Q Why?

A Because she was still pushing for these people. I think Caroline also had a phone call about this, and I told her that there was no way these people were going to get on the President's stage. It will never happen. The White House will never approve. That's when she was trying to reassure me that everything was fine, and alluded to Dan, which is why I notified the Chief of Staff and asked him to call me, because there was out of control.

And I had told him that I'm not going to be a part of this. If these people are involved, then I mentioned to him that, you know, she mentioned that Dan might have approved it, because the Chief of Staff said he had no idea. At that point, he didn't even know who Caroline was. He said that no one had spoken to them about it, they hadn't seen any lists, and then he told me to talk to Dan.

[12:07 p.m.]

BY [redacted]

Q Fair enough. So let's look at those texts that prompt those -- that conversation with Mr. Meadows.

So on exhibit 9, and at the bottom of page 1, on January 2nd, so about a -- you know, not long after Caroline sends you that list of speakers, you write to Mr. Meadows: Would you mind giving me a call regarding this January 6th event? Things have gotten crazy, and I desperately need some direction. Please.

And on your phone records, if we look at exhibit 2 -- sorry to jump around -- at page 3, and it's going to be the first yellow one we see. Now -- and we zoom in.

Now, you had written him -- these text messages are in Eastern Time, so at 5:15 -- 5:15 p.m., if you look at this yellow line, it's the first call we have in your records in this time period. It comes from Mr. Meadows.

Now, it shows here at 1624, but that's in Texas time. So, in other words, it's at 5:24 p.m. Eastern Time. And he calls and talks to you for, it looks to be, about -- you know, almost 7 minutes or so.

So what -- as best you can remember, what did the two of you talk about in that call? Was it strictly about the rally and the help you needed?

A It was strictly about that. I -- he called me back. He said, what's going on?

I said, Look, Caroline Wren is trying to include Alex Jones, Ali Alexander, and all these other crazy people on the President's stage, and that is a disaster, and I can't be a part of that. But she's telling me that somebody in the White House has approved this.

And he goes, Who is Caroline?

And I said, Caroline Wren, she's a fundraiser.

He didn't know her. I said, okay. Well, I don't know who else she's talking to. She told me that nobody was there, everybody was gone, which you're obviously there. And I just said, Look, we can't have this. This is going to embarrass the President. This is going to embarrass the entire movement. It's going to make everybody look bad.

So I'm making my case basically.

And he goes -- he just agreed with me, and he just said, Look, we haven't seen any list. No one has spoken to me about it. I haven't talked to anybody about January 6th. He goes, So just why don't you just take this over to make sure that this doesn't go bad.

And that was the point that the chief of staff asked me to take over the event. And that's when I got really involved.

Q And in your conversation with Mr. Meadows, was anyone else on the phone with the two of you?

A No.

Q He was aware of the event, though, at the time -- the January 6th event itself, right?

A Yes.

Q And you understood at that time that the -- that the President -- at least the plan was for him to speak at the event?

A By that time, yes. He had tweeted that, yes.

Q And Mr. Meadows -- what else did he tell you about, during that call, their plans within the White House for the event? Put aside who else would speak, but what did he tell you they were planning for that day?

A He didn't say anything. He said they hadn't had a discussion about it, they didn't know who was speaking, there were no lists. He had not spoken to anyone.

Q And I apologize. On the speakers. I'll put that aside. I'll be more clear.

In terms of what would happen after the President was done speaking, did he give you -- did he talk to you about the fact that the President would be telling people to march to the Capitol?

A I don't know if it was that phone call, but there -- he asked me if people -- because I gave him the lay of the land and told him what was happening and what I had been told about all the stages that were going to be there. So I kind of gave him a briefing of such, and that some people were going to the Capitol, but this event was going to be separate. You know, just initial lay of the land. But he didn't go in any specifics or any plans. We had not had that discussion.

Q So what specifically did you tell him, though, about other -- other events? How did you tell -- describe it to him on the 6th?

A Just that there were -- just that there were a bunch of entities coming in. Some were very suspect, but they're going to be on other -- on other stages, some on other days. A very, very brief overview of what was actually happening and why I raised the red flags.

Q And when you told him that people were very suspect, what -- what did -- did you tell him what you meant by that, or what did you convey to him about what you were -- the problems with these folks?

A I think I even texted him some of my concerns. But I did briefly go over some of the concerns that I had raised to everybody with Alex Jones or Ali Alexander and some of the rhetoric that they were doing. I probably mentioned to him that they had already caused trouble at other capitols or at the previous event -- the previous march that they did for protesting. And I just had a concern about it.

And he just -- he wasn't aware of any of it, and that's why he just said, Look, I

haven't spoken to anybody. We haven't had a discussion here about it. Can you just -- can you just take this over and make sure that everything works out for the President?

And I said, okay.

And that's when -- that's when I personally became involved, involved in the event and really started to dig in to who people were, what they were doing, what everybody's roles were. And then, as you can see, I started looking for quality -- quality and control measures.

Q Did Mr. Meadows know who Alex Jones was?

A He didn't say. I said his name, but he didn't -- we didn't have a discussion about Alex Jones.

Q In other words, did he have --

A I'm pretty sure he knew who he was.

Q He didn't ask, Who is that, right? Okay.

A No.

Q Did you bring up Roger Stone?

A I don't recall specifically. My main concern in raising flags with the chief was Alex Jones and Ali Alexander.

Q But you do remember bringing up the capital issue that they had had in Georgia, right?

A Yeah. So there's just been a lot of activity leading up to this that I'm just not comfortable with.

Q So I -- it might be helpful to -- you know, I can represent to you, just so you know, that the -- the event had been a topic of discussion with the White House for several days at this point. And so when I hear you say that Mr. Meadows didn't know

anything about it, I just want to make sure we're clear what you're talking about.

When he was saying he didn't know about it, he was speaking about who would speak at the event?

A Speaking.

Q Is that what you mean? Yes. Okay.

A Correct. Speaking.

Q All right. Okay. So you -- this is when you kick into gear and take control, per Mr. Meadows' direction.

Let me think. I'm just trying to organize my thoughts. Give me one moment.

A Uh-huh.

Q If we look at exhibit 29.

Well, look at your phone records real quick, actually, just to show you. So you see you had that call on January 2nd, Ms. Pierson. And if you scroll down, you don't see any, you know, Mark Meadows again until the afternoon of January 3rd.

Do you see that right there --

A I do.

Q -- highlighted in yellow?

Okay. So, in other words, it go -- a day goes by, 24 hours, before you talk to him, roughly -- roughly. And, in between, it -- you don't talk to, from what we can see, anybody else within the White House.

Do you remember talking to anyone within the White House between your phone calls with Mr. Meadows?

A Between Meadows' calls? No --

Q Yeah.

A -- because I don't think I spoke to Dan until after that.

Q Right. Okay. And you hadn't yet started talking to Max Miller, who you -- you started talking to after the meeting with the President on the 4th, right?

A Correct.

Q Okay. So, then, if we look at -- hmm -- exhibit 29, this is an email from you to Mr. Budowich and Caroline on January 2nd at 10:49 p.m. And this was produced by Mr. Budowich, so I apologize. You know, he's in California, so whether that was at, you know, 7:49 his time or 10:49 East Coast, I don't know, but it's on the night of the 2nd.

And you send speaker schedule. Do you remember sending an email to this effect after speaking with Mr. Meadows and taking control in this way?

A Yes. I think there were some phone calls between Taylor and myself as well, and my attempt was to move all of those people off the 6th and put the people -- put her people on the 5th.

Q And what was Mr. Budowich's reaction to the notion of having Ali Alexander, Alex Jones, and other people speaking with the President on the 6th?

A Same as mine. He agreed with me.

Q And did he talk about, in the context not only of President Trump, but potentially what that could look like for Don Jr. and Kimberly Guilfoyle?

A For anyone with any credibility, it would be a disaster.

Q All right. So you start off your email -- it's underneath that -- the avatar right there. It says: Hey guys, I spent the better part of the day on the phone with these organizers, comma, and was able to get a little guidance from the White House.

And I just want to go down to point 4 first. And point 4 is, POTUS expectations are to have something intimate at the Ellipse, and call on everyone to march to the Capitol.

A Uh-huh.

Q So the only person you had talked to in the White House before you sent this email was Mark Meadows, right?

A Yeah, and I think he texted me about that.

Q We'll go back and look. I don't know if it's there on this point.

A Yes. Okay.

Q But certainly communicate generally. It was only Mr. Meadows up to this point about --

A Up to that point.

Q -- the specifics? Yeah.

A Yes.

Q And you say the POTUS expectations. So I don't presume you would speak for the President. Did Mr. Meadows tell you what the President's expectations were?

A What is the date on that again?

Q This is the 2nd, so after you talked --

A Right.

Q -- to Mr. Meadows.

A Yes. So that is correct. When I gave him the lay of the land, told him where people were going to be speaking and that some people were going to the Capitol, yes, he agreed.

Q Okay. Agreed or told you that that was their -- that was their thinking as well, or had been their thinking?

A I don't recall the specific words, but we did discuss the lay of the land that day.

Q All right. But the result --

A I can't tell you specifically what he said verbatim.

Q Understood. But what you conveyed to Mr. Budowich and Ms. Wren is that the POTUS expectations are to have something intimate at the Ellipse, so small stage, not everybody speaking. That's one, right?

A Yes.

Q And then call on everyone to march to the Capitol. Is that right?

A Correct.

Q Okay. And so that he, the President, would call on everybody to go to where the other events were at the Capitol?

A Yes, because there was a march -- supposedly a march that was being organized to go to the Capitol. This is the one that was all over Twitter. So he knew there was going to be a march going on at the Capitol, and he was going to have his event and -- so people were going to the Capitol. They had the SCOTUS stage that I believe the Kremers were working on, and then I was told that Ali's group had a permit for the Capitol. So, yes, that's correct.

Q Okay. Okay. And along those lines, you continue on. You say: This actually works out because Ali's group is already setting up at the Capitol and SCOTUS is on the way.

And then you --

A Yes.

Q -- continue on.

Okay. What was the SCOTUS reference to? You talk about it in point 5, but what was the possible plan?

A That -- so the Kremers were disheartened that their speakers weren't going to get to speak on the 6th because, at this time, there really wasn't a speakers list. We just knew that that was going to have to come from the White House. So they decided

that they could possibly set up a stage at SCOTUS, which apparently didn't work the same way. It was more of a -- more of a first come, first serve type deal that they were going to try to set up a stage there so that their speakers who couldn't get to speak on that day could still speak but just at SCOTUS.

Q And on the point of who could speak then -- and I should say -- let me ask this in terms of timing. Did you always understand the President would speak at the rally at the Ellipse before the proceedings at the Capitol commenced on the 6th at 1 p.m.?

A I did not know what time until the day we met.

Q All right. But you understood the events up at the Capitol, whenever the President would speak, that these other events by Ali and the Kremers would be taking place while the Congress was in session?

A I did not have the timeframes of what their plans were.

Q On your points 1 through 3, you talk about the speaker schedule, and you used color --

A Uh-huh.

Q -- coding to talk about this. I think you applied and tried to bring some order to the speakers by doing this. Is that fair?

A Yes. Yes.

Q Your first point is the green marks are those who are already confirmed speaking on the 5th. The --

A Uh-huh.

Q -- red marks are suggested to move to the 5th and/or SCOTUS, right?

A Correct.

Q And then the yellow marks are either don't pass vetting, or there may be an issue to explore.

The don't pass vetting, was there someone other than you who was doing the vetting at this point?

A No. This would be a carryover vetting from what the campaign had did previously, because no one was doing vetting at this point.

Q All right. So if we look at -- the attachment to your email is the speaker schedule. It's at exhibit 30. And just the way it showed up is it's really small. Well, we can -- we can zoom in.

But if we go to that peach block in the middle, similar to the orange block that Caroline had sent you, so the "stop the steal"?

A Uh-huh.

Q Fair to say you moved all of those people to the 5th, except you highlighted Scott Presler as potentially not passing vetting. Is that right?

A Correct.

Q All right. So Roger Stone, Alex Jones, Ali Alexander, consistent with what you've been saying, they're not going to speak on the 6th at the Ellipse?

A Correct.

Q All right. How did Caroline react to that?

A To this specifically?

Q Yeah.

A She -- she seemed to go along with it, because I was dealing with Cindy Chafian, Caroline Wren, and the Kremers. So I was trying to put on paper what this would look like between the 5th and the 6th. I don't even think I completed this, because it was too time consuming, which got -- looks like everybody that they wanted to speak was going to speak, just not on the stage that they wanted.

Q Uh-huh. Well, if we look at exhibit 20, which is back to your text messages

with Ms. Wren, and we look at page 8. And just go down to the tweet that Ms. Wren sends -- excuse me -- text that Ms. Wren sends right there.

So the next day, 4:53 p.m. on January 3rd, she sends you her list again. That's where it starts, but you can carry it over to the next page to see the full thing. So onto page 9 if you could go.

And in the "stop the steal," she still has Ali Alexander and Roger Stone, but Alex Jones is gone, and asks you below, if you scroll down just a little bit: Is this more manageable?

So, again, still not giving up on at least those two of the three, right? She's still trying to get them on? Okay.

A That's correct.

Q And you say that you'll -- you'll call her right back.

So then what I want to do is, to your point about getting in touch with Mr. Scavino at Mr. Meadows' direction, I think this is where that happens. So if we go to look at your text messages with Mr. Meadows, and we go to page 2.

If we're there, and we go down to 1:39 p.m., so a few hours before that, you -- you express to Mr. Meadows: Scratch that. Caroline Wren has decided to move forward with the original psycho list. Apparently Dan Scavino approved. So I'm done. I can't be a part of embarrassing POTUS any further. I let her know --

So that's -- that's what you tell him. And then I'll just represent to you, but it sounds that -- you can see that Mr. Meadows calls you.

A Right.

Q Does that sound about right? So he's saying --

A That sounds right.

Q Okay. And you say, Follow up after the call: I let her know that I was

going to reach out to White House, and her tone changed. So I'll continue to build a proper event.

And even though her tone changed, at 4:55 on the next page, page 3 -- can't see it because it doesn't come across in the way you produced your texts, but at 4:55, you say, "Her counter." And it's clear there's an attachment of some sort.

Do you think you sent the list that Ms. Wren sent you a few minutes prior that still had Ali Alexander and Roger Stone on it?

A Right. Yes. It was a screenshot of her list.

Q Right. And you say to him: I think she made promises to these people without weighing the consequences.

Why -- why is -- why is that your reaction to Mr. Meadows after seeing that list?

A Because I couldn't understand why. I -- it did not make any sense to me on why she was so adamant about having these people on stage.

Q And you had -- you had taken a shot at that with Kylie.

If you look at your text messages with her on exhibit 8, on page 4, you know, a few days prior, as you're trying to suss this out, at 10:08 p.m. on December 30th, Kylie says to you: Exactly. I don't understand how Caroline is wrapped up in this, though. It's weird to me.

And your response is: POTUS.

And Kylie says: But just let the crazies be crazies. You can't do anything about them.

And your response is, at 10:09: And he likes the crazies, so she had to try and work with everyone. So she should have just called me first instead of after the fact. LOL.

So when you said that he likes the crazies, were you talking about

President Trump?

A Yes, I was talking about President Trump. He loved people who viciously defended him in public.

Q And so you said she had to try and work with everyone. When you said that, you're referring to Caroline?

A Yes. That's what she was telling me, yes.

Q And so, at that time, you were still under the impression she's working with the White House, with Dan Scavino?

A Correct.

Q But consistent in terms of the support for these people, at least with what the President likes, from what you could tell?

A Yes. The -- the people that would be very, very vicious in publicly defending him. And then once I spoke to Dan, that changed.

Q And we're almost right there. And we're moving at a good clip, I should tell you, just so you know.

A Okay.

Q It might not feel that way, but I promise you.

So if we go back just to set that exact up -- situation up, that's exhibit 9, and page 3. If you go down right below there just so we can see -- Mr. Meadows' response is: Better than it could be.

And I think it's fair to say you didn't agree that it was better in any way, based on how you respond. Is that -- is that fair?

A Correct.

Q Okay. Because you give the quote from the Daily Beast article about Mr. Alexander to -- to Mr. Meadows about the God and vengeance. And then the

comment about Mr. Presler.

And then you continue on at 5:02 p.m. to tell Mr. Meadows about Mr. Alexander changing his name because he was convicted of theft and credit card fraud and that his donations are going into his personal bank account. The list goes on.

A Right.

Q And then at 5:03 p.m., so on the heels of that, you said: These are the grifter fringe of the right. The crazies.

And so after you say it's the crazies, at 5:15 p.m., Mr. Meadows tells you to, if we scroll down, talk it over with Scavino.

A Yes.

Q And so what -- why did you understand him, after all these things you're saying -- he's telling you to talk it over with Scavino?

A So if you scroll back up, you'll see, when I was listing all the reasons why I was concerned, he says, "What?"

Q Right.

A Right there.

Q Right.

A And then I explain further. And he says, "Talk it over with Scavino." Which, again, made me think that maybe it is Dan Scavino.

Q And you did, in fact, talk with Mr. Scavino that day, right?

A I did.

Q Okay. If --

A It was either that day or the day after. I don't remember. 3rd or 4th.

Q We'll help with --

A Yes, that day. That day.

Q We'll help -- we'll help with that.

On exhibit 2 at page 4. You see in red on page 4. Looks like you try to reach Mr. Scavino first with an outgoing call that doesn't get picked up. And then at what is the equivalent of 7:16 p.m. Eastern, he calls you, and you have a conversation for what's about 14 minutes or so.

So let me just start first: That number that you used for Mr. Scavino, was that the only one that you had for him that you know of?

A Yes.

Q Okay. Did you ever know Mr. Scavino, in your experience, to have used burner phones to communicate with you or others?

A Not to my knowledge.

Q All right. Had he ever told you to use burner phones?

A No.

Q All right. So you were comfortable texting and calling with him with -- in a phone registered in your name?

A Yes.

Q All right. Same as with Mr. Meadows?

A Yes.

Q So this 14-minute-long call with -- with Mr. Scavino, as best you can, can you please tell us what you all discussed in as much detail as possible?

A Well, prior to the call -- I did call him after the chief of staff told me to talk with Dan. And I text him saying, Hey, Meadows asked me to reach out to you, et cetera, et cetera. I don't know the exact words.

He said, I'll call you after -- or I'll call you when I can, kind of thing.

So when he called me, I said, Look, I don't know what's going on, but, you know,

Caroline's saying that she talked to you about this. Chief of staff said he didn't know anything about it and to talk to you about this, but apparently someone is green-lighting some really bad speakers to be on stage with the President, and I just think you guys need to know about it, because it's going to be a disaster.

And I, again, gave him sort of the lay of the land and what I knew at the time and how things were flowing and working in that process. And -- and he says, I haven't talked to Caroline. I haven't talked to anyone. He goes, And I haven't spoken to anyone about speaking on stage. And he goes, And the President hasn't said anything to me about this.

And I said, Well, look, this is going to be a disaster, so I'm just letting you know. And if this is happening, then I can't be a part of it.

And he goes, No. He goes, You just need to come and talk to him, and you let him put this to bed.

So Dan is the one that asked me to go to the White House.

And I said, Well, I'm kind of bedridden right now, and I'm in Texas. And I said, But if I can find a flight out, you know, I will come in tomorrow and try to put this to bed for everyone. And I found a flight out that morning.

Q The morning for January 4th?

A Correct.

Q Okay. Before you talked to Mr. Scavino, did that Breitbart article by Mr. Boyle, had that been published yet? It doesn't look like it.

A I don't -- no, I don't think so, because I then told everyone that I was asked to go and sit down with the President to go over logistics for that day, and then the article came out that night. So Caroline knew that I was going to go talk to the President, and I knew that it was her that leaked the article -- her list of speakers.

Q Okay. So we'll get to the article in a moment, but that helps for timing.

All right. So when you talk to Mr. Scavino -- and, again, I know it's hard more than a year later to -- to do as much detail as you can about a 14-minute call, but 14 minutes is a long time.

A Yeah.

Q Did you walk through him the people that -- specifically people that Caroline was suggesting that you had issues with?

A I did. I went through all -- I mean, all of my concerns. Because, again, at that point, I felt like somebody was lying to me or I wasn't getting all the facts. And it's really hard to, you know, navigate these types of things with so many gears shifting if you don't know what's happening.

And so I just tried to give him, you know, a kind of briefing to help him make decisions as well, since I was being deferred to Scavino. And I outlaid all of my concerns, all of the issues that had come up from December on through now, what I -- what I felt we should not be doing or including, and just really all of the red flags.

Q Now, Mr. Scavino, he obviously had to know who Alex Jones was, right?

A Yes.

Q All right. And did you -- I imagine Roger Stone came up as well, and he knew who he was?

A Yes.

Q All right. Did he know who Ali Alexander was?

A Yes.

Q All right.

A Just through Twitter, though. That's all he said.

Q Not the Social Media Summit?

A Well, I know, right? Just as a Twitter person. I mean, just because you go to an event with the same people doesn't mean you actually know them, and I understand that. But he told me he had not spoken to any of them.

Q Had Mr. Alexander been talking to you at all, or you hadn't been interfacing with him?

A No.

Q All right.

A I don't even think I've ever met him.

Q Okay. And the concerns you raised, were they the same concerns you raised with Mr. Meadows and that you've talked about throughout today, to include the risk of potential, you know, violence at the Capitol, or just violence in general based on what these guys would say with the rhetoric?

A It's fair to say that I was a broken record, yes.

Q And what was Mr. Scavino's reaction to that? Was he concerned?

A He was concerned. I mean, his response immediately was, You need to come and sit down and talk to him and clear this up and make sure that this goes the way that he wants it to go, and not what all these people are saying.

And then he set it up for me to go in and meet with the President.

Q Did Mr. Scavino express any concern about crowd size, about whether you needed to have a certain number of people associated with the event with influence to be able to get enough people there to have an event that would be to the liking of the President?

A I don't -- I don't recall that specifically.

Q And did he react to Ali Alexander differently than, say, Roger Stone and Alex Jones? Were his feelings in any may more favorable toward Mr. Alexander versus

those two, or the same?

A There was really no difference, as far as I can remember.

Q Why did you need to come meet with the President? If Mr. Scavino was saying to you he hadn't had any discussions with these people, Mr. Meadows was saying the same, so it sounds like, to your knowledge, there was no one in the White House who had made any promises to Ms. Wren, right?

A Correct.

Q All right. So if -- from what you're saying, were they, Mr. Meadows and Mr. Scavino, on board with what you were proposing in terms of the speakers?

A Yes. It is fair to say, which is why I believe the chief of staff asked me to take over that piece of it and why Dan asked me to come in and talk to the President. Because one of the things in -- well, when you work for a President, it's -- what he says goes. It doesn't matter what anybody else is saying. So it makes sense to want to sit down with the President to figure out exactly what he wanted, who he wanted to speak. And that, on a normal day, would have put everything else to bed.

Q Was it important for you to be able to represent that you were meeting with him so you could represent directly to Caroline and the people she was with that it was from the word of the President, and so, you know, that was that?

A Absolutely, yes.

Q Okay. And so when Mr. Scavino said you could come in on the 4th, what did he say the format of the meeting would be and where and who would be there?

A He didn't say anything. He just said, Come see him before he leaves for Georgia. Put me in touch, I think, with Molly to get on the calendar, to get on the schedule or to get put in WAVE, something like that. And then I did my own agenda for whom I thought might be in the room, but he didn't tell me if anybody was going to be

there. And he wasn't even there.

Q Now, this -- after you're done speaking with Mr. Scavino, that's -- we've talked about this Breitbart article comes out, right? And is that by Mr. Boyle?

A Correct.

Q All right. And so I -- did Ms. Wren ever confirm for you that she leaked to Mr. Boyle, or just you could tell based on what was in the article and the timing?

A Well, I could tell because I called Mr. Boyle and asked him to take it down, because it was incorrect information. And -- and he told me that he was not going to take it down because a rally organizer had given it to him.

And I said, Well, it wasn't me, and it wasn't the Kremers. So if you're talking about Caroline Wren, then she lied to you, and she's not organizing this rally, and I'm going to go meet with the President. So these names are wrong.

And he said, Well, a rally organizer gave it to me, so I'm leaving it up.

Q One of the -- someone else you talked to after you talked to Mr. Boyle was Arthur Schwartz. You had a couple of calls with him that evening. Who is Mr. Schwartz, and do you remember why you were talking to him around the time of this article?

A Arthur Schwartz is another adviser to Don Jr. And I don't know if the call was before or after text message exchanges, because he was concerned that these people were on the list. I think one of his messages said, Are we seriously sharing the stage with these people? Something to that effect. And we had a phone discussion about it, and he was not happy.

Q Did he do anything to try and address the situation, to your knowledge?

A I don't remember.

Q Okay. And was he unhappy with the situation of these potential speakers,

like Ali Alexander and Alex Jones and Roger Stone, for the same reasons you were not comfortable with it?

A Yes. He was very upset.

Q All right. And was he looking out for Don Jr. or who with --

A I mean, I think it was the same as me. I mean, it was for everyone.

Q Everyone. And when you say everyone --

A Including Don Jr.

Q -- is that the Trump family as a whole?

A The Trump family. I mean, just the average person that's going to be there. I mean, that -- these people are just not the people you want to be associated with in general, period.

Q So if we look at exhibit 33, it's the Breitbart article. And you can go scroll down a little bit below the picture just to orient you.

So there's Matthew Boyle on January 3rd in the evening. So if we go to the second page, I think right there, and maybe the giveaway to who leaked, is that the -- excuse me one second.

The Washington pollen gives me fits. I apologize.

The President is expected to deliver remarks beginning at around 11 a.m. He will cap off an event at which several other high-profile names, including Kimberly Guilfoyle.

So the first name is Ms. Guilfoyle, and then the last name is, at the end of the paragraph, Ali Alexander.

And then it continues down to the -- two paragraphs down. It references a website. If you see, there's a hyperlink, MarchtoSaveAmerica.com. Has a place to go to RSVP. Was that the Kremers' website?

A No, it was not.

Q Whose website was it?

A Caroline's.

Q And -- and continuing on below that, it says: The official program will begin around 9 a.m., and, again, will be capped by Trump's speech beginning around 11 a.m. When the President finishes his remarks, organizers will then lead a march up to the U.S. Capitol, where they are expected to arrive around 1 p.m., the time during which the new Congress, which is being sworn in on Sunday, will consider certification of the electoral college results.

Was all of that accurate, to your knowledge?

A I knew that Caroline -- her group did want to go to the Capitol. They were absolutely going to the Capitol.

Q It talks here about organizers will lead the march. Did you understand the Kremers to be leading a march from the Ellipse, that they were going to do that?

A My understanding was that they were not going to be marching at all.

Q How about in terms of things --

A The only thing that came up -- the only thing that came up after the fact was a workaround to getting their speakers to speak on that day, which is why they were going to try to do a stage at the Supreme Court.

Q Why do you call it a workaround? The workaround because they couldn't speak on the 6th, you mean?

A Yes.

Q At the Ellipse, that is.

A At the Ellipse, yes.

Q Okay. But having to move from the Ellipse to the Supreme Court would require people actually walking or otherwise traveling, right?

A Sure. Sure.

Q Okay. So when I ask about -- but did you understand the Kremers would be leading a march to get people to where they were at?

A No, I didn't understand that to be them leading the march. I knew Caroline's people were wanting to march.

Q And on this point, were you involved in any way with permitting for the event yourself?

A No.

Q All right. Was there any -- this -- the thing you had emailed on January 2nd, after your conversation with Mark Meadows, to the email you sent that night to Mr. Budowich and Ms. Wren about POTUS' expectations, you recall that email?

A Yes.

Q Okay. And one of the expectations was to then, after he's done speaking, send everybody to the Capitol, right?

A Yes.

Q Okay. To your knowledge, did the White House ever publicize the fact, prior to the President actually speaking on the 6th, that he was going to tell people to go to the Capitol?

A Was it -- you're asking me if it was public?

Q Yeah.

A I -- I don't recall seeing anything publicly.

Q And on that point, if we look at exhibit 31, these are text messages that Kylie produced, and this is with Mike Lindell of MyPillow.

And if we look at page 3, on January 4th at 9:32 a.m., you see that Ms. Kremer -- Kylie tells Mr. Lindell: I don't have any control or knowledge about

tomorrow -- being the 5th. I will try and find out, but maybe better you stay away from the crazies like Alex Jones that speak tomorrow and just speak Wednesday.

This stays only between us. We are having a second stage at the Supreme Court again after the Ellipse. POTUS is going to have us march there/the Capitol.

It cannot get out about the second stage because people will try and set another up and sabotage it. It can also not get out about the march because I will be in trouble with the National Park Service and all the agencies, but POTUS is going to just call for it, quote, "unexpectedly," close quote.

POTUS is confirming speaking schedule for Ellipse, and we should have by COB today -- I think a reference to your meeting.

If anyone tells you otherwise, it's not accurate info. Only myself and Katrina know full story of what is actually happening, and we are having to appease many people by saying certain things.

So this -- this -- this notion that Ms. Kremer was telling Mr. Lindell about having to keep it secret about the President directing people to the Capitol, had the two of you ever talked about it in that -- in those terms?

A Only because of what Caroline was telling us.

Q Which was what?

A That they were going to march to the Capitol and POTUS wanted to go. And then when I spoke to him -- was this before or after my meeting? That's before my meeting. Okay.

So -- because Caroline was convinced that he was going to go and they were going to march. And I don't know what she means by, we know what's actually happening; I mean, everything is in writing. But the Supreme Court thing was a new thing, because, again, they were looking to find a place for their speakers to speak on that day.

Q I hear you on that point. What I'm focusing in on is the -- she says: POTUS is going to have us march there/the Capitol."

And that's consistent with what Mr. Meadows had told you on January 2nd, right?

A Yes.

Q All right. And, you know, she does -- Ms. Kremer does express concern about that getting out, about the second stage, because people will try and sabotage it. But she also says: It can't get out about the march because I'll be in trouble with the National Park Service and all the agencies.

And on that point, did you understand the Kremers to have a -- a permit to do a march from the Ellipse to the Capitol?

A Well, see, that's the part that checks out with me, because the Kremers told me that they didn't have a permit to march. So my assumption was then, well, maybe Caroline's got a permit to march. But I never had that discussion with Caroline.

Q Right. So in not having a permit, Ms. Kremer is saying, I will be in trouble with the National Park Service if it gets out that the President is going to direct people at the Ellipse to march. Do you see that part?

A I do see that part.

Q All right. Did she discuss with you the fact that she was worried she could get in trouble with the President saying that?

A Well, no. She told me she would get in trouble if they marched.

Q Uh-huh.

A The part about the President, we didn't discuss.

Q Okay. Well, you must have, because she knows it right there, right? Had anybody else told her about the President going to direct people to march?

A Well, Caroline.

Q How did Caroline --

A Caroline -- Caroline was saying that from the beginning.

Q Okay.

A There -- she was pushing the march. She had her separate website for the march. So, yeah, I mean, they -- there was an understanding that she obviously would want to. But, no, I had no knowledge he was actually going to march. In fact, at my meeting with him, it was decided that he wouldn't.

Q And that's about him marching, and we're going to --

A Right.

Q -- get through -- thank you.

A Okay.

Q But just on this part about him telling the rally goers to go to the Capitol --

A Yes.

Q -- did you and Ms. Kremer talk about the fact that it needed to be kept secret, so to speak; it couldn't get out?

A I don't know why that couldn't get out. I mean, if he wanted everybody to go to the Capitol, he would say it, which he did. But because there was a march that was being advertised and that people were going to the Capitol, I don't know why that would have to be secret, because it was -- it was public. Everybody was tweeting it. Everybody was posting it. People were going to march to the Capitol that day.

Mr. Warrington. Hey, [redacted], I just want to jump in here just to clarify something, that you're asking her to comment on what somebody else meant. She wasn't on this text exchange. She wasn't in this conversation with Mike Lindell. So she's speculating as to what might have been in the mind of Kylie Kremer at this point.

[redacted] I appreciate that, Dave, and thank you.

BY [redacted]

Q And that's why I was asking if they had -- you, Ms. Pierson, and Ms. Kremer had conversations to this point about the needing to keep it secret and having President just do it, quote, "unexpectedly."

A No. There was no secret conversation about it. I mean, like I said, it was all public that they were -- there were people that were going to march.

Q But did you see a distinction between people who'd just march on their own volition and the President actually saying at the Ellipse rally for them to march?

A I do, yes.

Q Okay. And so presumably -- you tell me if I'm right or wrong about this -- you know, given the President's influence, would you expect more people to listen to him and march if he says it than if they're just left to their own devices?

A I mean, they were planning to march, so they were going to march. But the fact that he says it also, I'm sure helps.

Q And when you say they, you mean all rally goers, or who do you mean?

A No, no, no. Meaning the people that were there to march. Like I said, there was -- it was very public that people were going to D.C. to march. So those people were going to march whether he asked them to or not. That was their plan.

Q I totally agree. So anybody who came to town --

A Yeah.

Q -- with the preformed plan that they were going to leave the Ellipse and march to the Capitol, that was their plan. The event that -- that was held on the Ellipse was advertised, I think, intentionally by Women for America First and talked about by you as its own thing, not connected to the events at the Capitol. Is that right?

A Correct.

Q All right. And so that, I imagine some people could have come to the event just to see the President without having a preformed plan to go to the Capitol afterwards, right?

A Yes. Yes.

Q All right. And so the fact that the President was going to tell everyone at the rally to march, I imagine you agree would -- the expectation would be more people would then go because he's reaching people who didn't have those plans before he said it, right?

A Yes. That's possible, yes.

Q All right. And so --

Mr. Warrington. Again -- again, [redacted] you're asking her to speculate what is in other people's minds.

[redacted] No, just the natural -- natural reaction.

BY [redacted]

Q Much like if the President retweets somebody, Ms. Kremer, does that bring more attention to the message than when they just say it on their own?

A Yes. That's possible, yes.

Q All right. Was there ever any discussion that you had amongst yourselves -- you directly with the Kremers or other rally organizers -- about whether to make public the fact that the President would say this, to tell the rally goers to march?

A I don't recall specifically that discussion ever being had.

Q Now, there -- I have to address another Rolling Stone article. If we look at exhibit 28, and we look at -- I think the -- the date -- I don't think the date came through, but it's -- it's relatively recently that this article --

A I saw it.

Q -- was published. Okay.

A Uh-huh.

Q So if we go to page 2, this is a gentleman named Scott Johnston who is talking to the reporter.

Do you know Mr. Johnston or had you ever heard of him before these articles started coming out?

A No.

Q All right. Are you aware now that he represents himself as someone who was a driver for the Kremers during the bus tour?

A Yes.

Q Did you ever see him or have you been told you saw him actually in D.C. during the events on January 6th?

A No. I don't even know what he looks like.

Q Right. Okay. So on page 2, I just have to read a few things and just get your response to this.

He -- Johnston tells Rolling Stone -- this is in the full -- first full paragraph. He says he overheard Mark Meadows, then former President Trump's chief of staff, and Katrina Pierson, Trump's national campaign spokeswoman, talking with Kylie Kremer, executive director of Women for America First, about plans for a march to the Capitol.

Johnston said that the conversation was clearly audible to him since it took place on a speakerphone as he drove Kremer between the group's rallies in the final 3 days of 2020.

Do you see that?

A Yes.

Q All right. Now, we looked at your phone records, and the first phone call

on your records that showed up between you and Mr. Meadows between December 19th and January 6th was on January 2nd. So --

A Right.

Q So in 2021, right?

A Yes.

Q So this -- what Mr. Johnston is saying here about a call, did that call take place in the final 3 days of 2020?

A No.

Q And were you ever on a call -- a three-way call with Mr. Meadows, yourself, and Kylie Kremer about the events --

A No.

Q -- of this rally?

A No. Not at all.

Q So now we come to January 4th. Did you get into town, into D.C., that is, the morning that day?

A Correct.

Q And we don't have to look at it. I -- in your text messages with Caroline, it looks like she sent you a package of materials that she wanted you to take with you to the White House to use. Do you remember that?

A Yes.

Q Did you use any of those materials at the White House?

A I did not.

Q Okay. And why not?

A Because I was done with Caroline at that point, and I just -- I was -- I was just done with her and everything that she was doing.

Q Now, if we --

A This is after that she leaked the article, and it was just -- I was just done.

Q Who came with you to the White House?

A Ashley Hayek.

Q And that's H-a-y-e-k?

A Yes.

Q Now, if we look at exhibit 34, is this the agenda you prepared for yourself, talking points --

A Yes. That's correct.

Q -- for the meeting? Okay.

The timing shows that the meeting was going to be January 4th at 3:30 p.m. And I'll tell you that the -- the White House visitor logs, that they show you and Ms. Hayek arriving right around 3:30 p.m. So --

A Okay.

Q -- just based on your memory, it went off at about the same time you thought it was going to occur?

A Yes.

Q Yeah? And it shows you two leaving, you know, a few minutes after 4 p.m. Does that sound about right, that you were there about half an hour?

A That sounds right.

Q Okay. Now, you list the attendees in what you typed up in advance as the President, Mark Meadows, yourself, and Dan Scavino, right?

A Yes.

Q Okay. Who actually --

A That was my assumption.

Q Uh-huh.

A That was my assumption, because those are the people that I had spoken to already.

Q All right. And the agenda is March to Save America Rally, and then you have background on Women for America First, four points about that.

And why was that background important for you in meeting with the President, conveying that about the organization?

A Because I knew he would probably remember who the Kremers were specifically, and I wanted to let him know that this was the same organization that had done the March for Trump and the previous two D.C. rallies.

Q And how would you characterize the event itself? Was this a White House event or was this a Women for America First event, or how would you say it?

A The Ellipse event?

Q Yes. Yes. Sorry.

A A Women for America First event. However, when the President's involved, you know, he -- it's sort of his event, but Women for America First were the -- was the entity that was hosting the event.

Q Okay. Certainly, when the President shows up anywhere, that brings with it a lot of --

A Yes.

Q -- baggage. And I don't mean that in a negative way. It just brings a lot of stuff with it that has to be taken care of, right?

A Yes. That's correct.

Q Okay. So compare this -- was this an official government event that the White House would put on or this was a private event that the President was showing up

at?

A It was a private event the President was showing up at.

Q And then you --

A That's how I would describe it.

Q And then you have a note there after the background to say: There is a Stop the Steal coalition and a Stop the Steal organization that participate in the coalition, which are very different.

So the organization you're referring to is what?

A I was talking about Ali Alexander's group versus the broader coalition of people.

Q That is -- okay. The collection of people that are supporting the President's efforts with respect to stop the steal, and then there's the organization of Ali Alexander specifically. Okay.

A Yes.

Q And so why was it important for you to make that contrast during this meeting?

A Because leading up to this, I mean, even just in social media, there just seems to be -- there seemed to be a lot of confusion about who was who. Everybody wanted to take credit for "stop the steal." It's the hashtags.

So I felt it was important, if I was going to sit down with the President, to make sure that he understood what the differences were between all these entities, because if I needed to make an argument, that would be very helpful.

Q And then the discussion is going to be, as you list there, event flow and speaker lineup. And then you have a list of four recommendations. The first is, "Keep the Ellipse portion intimate and official to control the narrative."

Now, the -- the intimate portion at the Ellipse, that was -- seems consistent with what Mark Meadows had told you back on January 2nd. Is that right?

A Yes.

Q All right.

A Correct.

Q And then, "and official to control the narrative."

What narrative needed to be controlled?

A Separate from Ali and Alex Jones' narrative.

Q So separate from all the things you described about them, to include the civil unrest, it's not going to be the narrative of the Ellipse?

A Correct.

Q The next point is, "Limit to 2016 surrogates," in parentheses, "vetted and on your team not their own."

That "not their own," there's a -- what did that mean to convey?

A I just meant there were a lot of people who got involved for their own reasons, whether it be to make money, whether it be to become an influencer, to build their own brand. I just felt like it should be people who have actually been doing this long enough to know that they're on one team here.

Q And they're looking out for the President and his interests and not their own?

A Correct.

Q The next point is, "Eliminate convicted felons that could damage the other speakers." It seems -- and when you say damage, I imagine you mean reputation, not physically hurt them?

A Oh, absolutely, yes. The integrity. I wanted the event to be people that

could maintain their integrity and have some -- someone else not be on the stage that could damage them, specifically for their reputation.

Q And then the last point is, "Keep the fringe on the fringe. We have alternative" -- it says "States available." Did you mean stages available?

A Should be stages. Yes, correct.

Q All right. And fringe in the same way you described that earlier today, right?

A Correct.

Q All right. And when you said alternative stages available, was that both a reference to the January 5th event, but also the -- the stages at the Capitol on the 6th?

A Yes, that's correct.

Q And then if you turn to page -- page 2 of this, is this a schedule -- a proposed schedule that you brought to discuss with the President?

A Yes. I did that one myself.

Q All right. So much slimmed down from what Caroline had been proposing, right?

A Yes.

Q Okay. And nowhere anywhere are any of the people we've been talking about that raised concerns on this list. Yeah?

A Correct. Yes.

Q Now, on your list is -- the first time that at least I think seeing, and maybe it popped up on an earlier draft you had, but Dan Scavino is listed in there as appearing before Eric Trump. Do you see that if we --

A Yes, I do.

Q Towards the bottom? All right.

Whose idea was it to put Mr. Scavino on the speaker list?

A It was mine. In one of our discussions, I said, You know, let me know if you want to speak, and we'll add you to the list.

Q And why would he be someone who'd be good to speak at this event out of all -- I think he'd be the only White House official other than the President himself.

A Because Dan had been speaking at some events earlier and, you know, he had just been helpful in helping me sort of stomp out some of the problems, and it was just a, hey, why don't you come speak. Let me know.

Q So when you get to the White House, where do they -- where do you go for the meeting?

A The President's dining room.

Q So off of the Oval Office?

A Correct.

Q Did Ms. Hayek come with you?

A No. She waited in the lobby.

Q When you -- can you please describe, when you get into the dining room, who is there and what's the scene look like?

A There was a lot of activity because he was getting ready -- as soon as I finished, he was leaving for Georgia. And when I walked in the dining room, I don't remember who specifically was there, because people come and go through either side. Again, I don't know if you've seen how that room is set up, but people were coming in and out. And, typically, the President has a stack of work that he's working on, a phone, and then another stack. And so he'll pick up one thing, work on it, put it in the other stack. Someone comes in, picks it up. And there's just a lot of people going in and out. So I honestly wasn't paying attention to any of that, because it was a regular workday, in

my opinion.

So when I went in to sit down with him, I sat to -- he was at the head of the table. I sat to his right. And then Max Miller came in and sat across from me. And there was somebody standing in the back corner. I don't really remember, because I was facing the President the whole time. I know -- I think Bobby Peede came in for something, because, again, they were getting ready to -- to leave. But that's all I can remember who I saw specifically there.

[1:04 p.m.]

BY [redacted]:

Q So the -- when you've been saying he was working on papers, just so we're clear, that was President Trump was seated at the table?

A Yes.

Q All right. And the end of the table that he sits -- was sitting at, is that with his back to the windows to the outside?

A Yes.

Q All right. And so as we understand it, was there a TV on the wall that he's facing at the end of the table, so he --

A I think that's correct.

Q All right. Do you remember the TV being on when you came in?

A I don't remember. I was so laser focused that day on what I needed to do. I don't remember, if that's possible.

Q And when you came into the room, did you come in with Max Miller and Bobby Peede or they were already there?

A No. I went in by himself, because I walked in and he looks up at me and goes, Hey, are you coming to Georgia with us? And I said, no, actually I'm here to discuss January 6th and what you're expecting. And he goes, Oh, yeah, so what's going on with that? And then I sat down, and then I think Max came in and sat down at some point after that.

Q And what did you understand Max's role at the White House to be at that point?

A I don't know what his title was, but I know he was with the President all the

time.

Q Had you understood him to help put on events for the campaign and presidential advance before the campaign?

A Yes. I do remember he was in advance, yes.

Q All right. Had you spoken to Mr. Miller in advance of coming in for that meeting about January 6th?

A I don't remember if I did or didn't. I know I did a lot after the fact.

Q And so, you didn't know -- did he explain why he was there, and Mark Meadows and Dan Scavino were not, or did anybody talk to that?

A No. I didn't even ask.

Q Did Mr. Miller join your conversation with the President about the event?

A For the most part he just sat there, and if the President asked him a question he would chime in. He really didn't say much until towards the end that I can remember, because I remember I closed my folder, and that's when the President brought up safety and the National Guard and those topics.

Q All right. So we'll get there. How about Mr. Peede, did he join in the conversation that you remember at all?

A No. I think he -- I think he just came in to give him, like, a timeframe, because they were leaving, and then I think he just walked out.

Q Okay. What if anything did you --

A I don't remember.

Q Oh, I'm sorry. Did someone say something?

A No, I was just trying to think if he said anything else. I just -- I don't remember.

Q What, if anything, did you put in front of the President in terms of paper,

Ms. Pierson?

A I put in -- I gave him my list, my suggested list.

Q So the set -- the page that's up on the screen now for exhibit 34, that's what he had in front of him?

A Yes.

Q All right. Did you give him your agenda?

A I don't think I gave him my agenda. The agenda was really for me.

Q Did you -- so just -- you told him you're there to talk about the event. So as best you can, can you recount up until the point you get to the discussion about security and walking, can you talk about what that part -- the first part of the discussion was about as best you can in as much detail as you can.

A Yes. I told him I wasn't going to Georgia, but I was just there to figure out what his expectations were for the event on January 6th. And he goes, Oh, so what's going on with that? And I said, well, there's a lot of people that want to speak, and there's been a lot of confusion. And it's just reached a point to where, you know, we feel like I need to ask you directly, because I want to make sure, you know, that you have the event that you expect for that day.

And he goes, oh, yeah, sure. So I gave him the list. And I said, all these people want to speak. And I said, I'm of the opinion, and he cut me off. And he starts looking at the list and says, so-and-so wants to speak, and so-and-so wants to speak? And I go, yeah, everybody wants to speak. And I went through, I think it was Diamond & Silk and Mike Lindell, the people that are on this list.

And he said, Why do they want to speak? And I said, Well, sir, this is, you know, a big day for you and everybody wants to be a part of it, and I'm sure you can understand that, and everybody wants to speak. And I said, but the reality is, we can't have

everybody speak, and I need to know what you want for that day.

And so he's looking at the list, and he says, Kimberly, why is Kimberly on my stage? And I said, I don't know. This is just to see how it goes. He says, Well, she's always on my stage. She doesn't need to be on my stage. I said, okay. And then he goes back up, and he starts going through the list of these people and says, No, they don't need to speak, and they don't need to speak.

And he just looked at me and said, Everybody really wants to speak? And I said, yeah. And he says, Well, is there anybody else -- anywhere else that they can speak? And I said, absolutely. I said there's -- the entire day on the 5th is open for people to speak. A lot of people are speaking on that day.

And I said my understanding is they're going to try to set up a stage at the Supreme Court so people who couldn't speak on your stage can go speak on that stage. And I said, it's also my understanding that there is a permit for a stage over at the Capitol, so I said there's plenty of room for everybody to speak that day.

And then he starts looking at the minutes, and he just kind of goes one by one and says, That's too long, That's too much. And then he finally just says, No, I don't think anybody needs to speak. And then he goes back to his kids, he goes, the kids want to speak, too? And I said, I'm sure if you're speaking, they're going to want to speak. And he goes, they don't need to speak.

And then he goes back to the top and says, you know what, I just want a lot of music. We don't really need speakers. And so that's when my mind kicked in and said, you know what, to him, and this is because you probably don't know and have sat with him for years like I have, for him, he saw it as sitting President of the United States speaking at the Ellipse, so I think in his mind, he was processing more of an official event and less of an event like a rally, so it was kind of a hybrid between the two. As he was

speaking out loud to me, I could see it unfold.

He only chose a handful of elected officials that he wanted to speak, again, along that official line. And I pointed out, I said, Look, I mean, I'm on there to speak. I don't need to speak. And I said, I was just going to introduce the host of the event. And he goes, well, you can do that. You can host the event. I said, great, because I don't really want to speak. I said, I'm here and paying anyway.

So -- and then I started taking notes, and then finally he just said he wanted a party. He wanted a lot of music and he wanted very small speeches, I think it was like 2 or 3 minutes each. And he chose three Congressmen, three Senators to do that portion of the program, but he wanted big blocks of music in between, and that's where the rally piece sort of kind of comes in as a hybrid.

He said, I just want people to have a party. People are going to come. I want them to, you know -- he didn't use fellowship, but it was in his mind what he was wanting to see is people coming together, because the reality is it was going to be his last speech while he was President. And I wrote all that down, I packaged it up and sent it in an email.

Q Understood. So the -- did he talk about the fact that it was going to be his last speech as President?

A He didn't. He didn't.

Q And did people that --

A But --

Q Oh, go ahead.

A I forgot to go into, like, the after piece of that, because I did, for my own purposes, ask about a couple of people, like Roger Stone and Ali Alexander.

Q Well, so what did you say about them and why did you bring them up?

A So when we got to the end, everything was fine, but, again, I felt like I wasn't getting all the information. I had already caught Caroline in a number of lies. But I really just wanted to see where the information about Roger Stone and Ali were coming from. And so, when we were going back and forth on the list, I said, What about Roger Stone? And he goes, Roger Stone, no, he doesn't need to speak. I said, okay.

And I go, Ali Alexander? I just kind of like threw it out there. And he says, Who? And I said, Ali Alexander. He goes, who is that? And I said, oh, he's a -- he's a Twitter -- he's a Twitter personality, kind of really out there. And he goes, I don't know who that is. And he goes, but he's on Twitter? I said, yeah. He goes, well, talk to Dan. And I did not ask about Alex Jones.

Q Well, Alex wasn't on Caroline's last proposal to you, I guess, right, so no need to ask about him?

A Well, I just wasn't -- I mean, that was a nonstarter for me anyway, so I just didn't even ask.

Q There are notes on this agenda, handwritten, if we can keep it up on the screen, that's exhibit 34.

A I can't guarantee I can read my writing.

Q No, it's okay. But these were hand -- the notes you were taking as the President was speaking to you?

A Yes.

Q All right. So we'll walk through them in a second, but when it came to Mr. Alexander in explaining that he was a Twitter person, you know, you had told us in November that you -- you told the President that -- your concerns with Mr. Alexander, the types of things he would say. Do you remember telling the President about that?

A When he asked me who he was, I said, you know, he's a guy on Twitter, says

some pretty inflammatory things. I kind of went into it briefly. I didn't go into too much detail though.

Q Did you bring up the Capitol incident in Georgia, and that's what prompted the security discussion at the end?

A I don't recall specifically bringing that up. The reason security came up is because he talked about wanting to go be with people. That's why security came up.

Q I see. I see. Well, then, looking at your handwritten notes at the bottom, if we zoom in, below the yellow, over to the left, that looks to be Stone's name.

A Oh, Stone 5th, yes.

Q Okay. So that came from the President. Keep him on the 5th?

A Yep.

Q All right. Now, to the bottom right in the handwriting, it looks like it says, No Rudy?

A That's correct.

Q And what was that about?

A Rudy was one of the other people that I asked about, mainly because I knew he had a relationship with him, and he was somebody else that Caroline was insisting upon. So I asked about Rudy Giuliani, and he said, No, Rudy doesn't need to speak. He needs to be preparing. And so I said no Rudy.

Q Did he say preparing for what?

A I guess he was going to present over at Congress. I didn't ask.

Q And then crossed out there, can you read that, the two words that are above "no Rudy" and next to "Stone"?

A I cannot read that.

Q That was the same thing you said in November. We -- okay.

A I don't -- I don't know.

Q Any other names come up that were not on your typed-up agenda but that you brought up as potential speakers that you can remember?

A Can you zoom out so I can see the ones that are actually on the list?

Q Sure. And we'll talk about the Members of Congress and Senators that the President suggested, but separate from them.

A Okay. So let's see, Gorka, Lindell, Diamond & Silk. No, I don't think anybody else came up. I just wanted to bring up a couple of names that Caroline continued to push insisting that it was coming from somewhere, and my concern was I just wanted to make sure it wasn't coming from him. And this was -- this discussion was my confirmation that it wasn't coming from him, at least to me.

Q Now, the strike-throughs in the names, that run right through the names, those are Sebastian Gorka, Mike Lindell, Diamond & Silk, State Senator Doug Mastriano, Texas AG Ken Paxton. Is that because the President told you just to strike them from the list?

A Yes, that's correct.

Q And there were -- the number 3 was written next to them on the left. Had he initially said they could speak for 3 minutes, and then he just decided to cut them out?

A That is correct. At first he said it was too much time. People that are speaking only need 3 minutes. And then by the time he finished looking at it, he just essentially scrapped everybody.

Q And the Members of Congress group, you take handwritten notes, and tell me if this is right. The three representatives he wanted to speak were Devon Nunes, Jim Jordan, and Mo Brooks?

A Yes.

Q Okay. And we can zoom in if it helps.

A Please. Okay.

Q Is that correct?

A Yes, that's correct.

Q All right. Did you understand them to be three of the most vocal members in support of the President's effort to object to the certification of the election results?

A Yes.

Q Then what's written in the blue part, I think you've told us previously, these are the three Senators that the President wanted to speak, Senators Cruz, Hawley, and Blackburn?

A Yes.

Q All right. And similarly, were these three Senators who have been at -- kind of vocally and at the lead of planning to object to the certification of the presidential election?

A Yes.

Q And while understanding that you talked about how the President -- you said he wanted a party atmosphere, did you understand that the focus of the event was going to be about Stop the Steal, and what was happening at the Capitol on the 6th?

A Yes.

Q Did you yourself interface with any of these Members of Congress, or the Senators about their participation or not in the event?

A I did not.

Q All right. Did you understand Brian Jack and maybe others to have talked to them about whether they would appear?

A Yes, Megan Powers, I believe, was running point on that, and she had

mentioned Brian -- she had asked Brian Jack to reach out to at least one of them.

Q Now, of the six, the only one who ends up speaking on the 6th is Mr. Brooks. Do you know that?

A That sounds about right.

Q Now, Madison Cawthorn also spoke on the 6th, but he wasn't on this list or of the names the President raised. Do you know how it is that he ended up speaking on the 6th?

A I do not.

Q In your planning for the rally generally, Ms. Pierson, from the time you got involved to the end, did you understand any Members of Congress or Senators or their staff to be involved in organizing the rally?

A No.

Q How did it settle within the blue segment with regard to the family members of the President speaking? By the end, what was the decision that had been reached about who would speak?

A By the end the host of the event could speak, I could introduce her, and then the boys could have a couple of minutes.

Q All right. Did Mr. Miller have any input as you were talking through any of these people that you remember?

A I don't remember.

Q How about when it -- when you raised Ali Alexander or Roger Stone, did he bring -- did he have any input on those two?

A I don't remember.

Q So then in talking about the -- you get the roster set and the expectations from the President. You said at this point, he raises the notion of going to the Capitol

and security. Is that right?

A Yes. He asked me, he says, Are people going to the Capitol? And I said, Yes, there are some people going to the Capitol. There is a permit for a stage at the Capitol. And he says, Well, I should walk with the people, which I did not take seriously, but because I know him so well, I know that he would absolutely want to be with the people, which is exactly why he did the drive-by the first time and the flyover the second time.

And that's when Max said, No, that's not a good idea. And he says, Why not? And Max said something like, that's not going to be safe. And he looked at me, and I go, No, it's not safe, like you're -- you should not be going to the Capitol. And he goes, Well, about safety, do we expect any issues? And, you know, I said, I don't know. I said, I haven't heard of any issues. All we know is that there have been some incidents at the last couple of events.

And he just cut me off, and he goes, well, we should call in the National Guard. And then I think it was Max who said something to the effect of, Well, we should only call in the Guard if we expect a problem. And then the President says, no, we should call in the Guard so that there aren't -- so that there isn't a problem. You know, we need to make sure people are protected.

And he said -- he looked over at Max, and I don't know if somebody was standing behind him or not. He just looked the other way from me and says, you know, I want to call in 10,000 National Guard. And then I opened my folder and wrote down 10,000 National Guard, closed my folder again. And then they were having that discussion.

And then I was finished with my piece of it. And then I said, Oh, by the way, I need to know what time you're speaking, and they told me 11:00 a.m., and I wrote that down. And there was a lot of shuffling going on because he was leaving. And I said,

Okay, I'm going to let you guys deal with that stuff, I need to go deal with this stuff, and that's when I left.

Q If we could look at page one of exhibit 34. This is your agenda. And as you mentioned, there's handwritten notes in the middle.

A Yes.

Q If we could just read those. The first one you see on the left is, it looks to be, 11:00 a.m. Is that right?

A Correct.

Q All right. Were you -- did you have this agenda -- you know, a paper copy of the agenda and were you taking notes on it during the meeting?

A Yes, that's correct.

Q Did you take notes anywhere else other than on this agenda and on the schedule we just looked at?

A Just those two pieces of paper.

Q What was 11:00 a.m.?

A The time he was going to speak.

Q So confirming it would be before the Joint Session of Congress began?

A Yes, 11:00 a.m., uh-huh. Correct.

Q And then next to that, it looks to be 10K Nat Guard. Is that right?

A Yes.

Q And what was that -- that's the number that you heard the President say?

A Yes, that's correct.

Q All right. So in terms of the walking to the Capitol, what exactly did the President say?

A He said that he wanted to be with the people, which like I said, would not

surprise me one bit. He wanted to be one with the people. He always does. And that is when Max said it's not safe. And, again, it's the discussion of, well, do we expect any problems? And --

Q But -- and I'll just stop you there. And without commenting on what you know the President's state of mind to be, and I'm surprised Mr. Warrington didn't say something, but it's fine, the -- what specifically did he -- did the President say about how he wanted to go and when to the Capitol?

A He said he wanted to walk to the Capitol.

Q All right. And you understood that to be after he was done speaking, I imagine?

A Yes.

Q And he didn't say anything else about that, just he was going to walk between the two places?

A Welt, that's what he said, but then that was disrupted by, No, that's not safe.

Q That was coming from Max Miller, right?

A Yes.

Q Did he say --

A And I agreed.

Q But did Mr. Miller talk about whether the President could drive up to the Capitol in a motorcade?

A I don't know if Max said it or if the President even offered it. I don't know. I don't know who might have mentioned that, but it was -- there were other methods. He was like, Well -- because he did the drive-by the first time and he did flyover the second time, so they were talking about that. But I don't know specifically if they were mentioning doing the same thing, but because that did come up, it's however -- if the

President wanted to go, they would make a plan for it. But the part that I was sitting in on was, No, it's not safe, and then the President calling for 10,000 National Guard. But, again, that was an ongoing discussion they continued to have as I left.

Q So on the National Guard then, so he asked, is it going to -- you say Mr. Miller says it's not going to be safe and that prompts the President to ask, Well, what's going to be the problem. So what specifically did you tell the President or Mr. Miller about the security concerns that you had for the day?

A Yes. Recounting what occurred in the previous events when they've had the marches, you know, there were some physical assaults, there were, you know, conflicts between Black Lives Matter, and then you have those other guys that were there, I don't even remember who all they were. But there were countless reports of people being attacked at some of these marches or rallies or whatever you want to call them.

So there was a high potential of that, on top of all of the previous encounters that specifically Trump supporters have run into with being attacked pretty much anywhere. So there was a concern that, you know, people could come and try to start trouble, so that was my concern.

Q Was it your impression that the police had not adequately addressed the issues that had happened at the November and December rally? Did you --

A I'm not even aware of what they did or didn't do.

Q Okay. And did the notion of what had happened at State Capitals that we went over earlier today, you know, armed confrontations and people going into buildings, did that come up at all?

A No.

Q Why not?

Mr. Warrington. So you wanted me to interject, so, again, that's speculation.

[redacted] Well, no, I mean, Ms. Pierson said she was aware of them.

BY [redacted]

Q Why didn't that come up as something that you raised with the President?

A Because those were all instances due to COVID, not the election integrity.

Q So you saw a difference between how people were reacting between the two issues?

A Yes. I did, yes.

Q Okay. But the concern you had about Ali Alexander when he went into the Georgia Capitol was specific to the election, wasn't it?

A Yes, that is correct.

Q Okay. So did that incident come up in your discussion with the President?

A I don't recall bringing that up.

Q The President's response then to that is having 10,000 National Guard troops just from talking about what had happened at the two prior rallies in November and December?

A Well, no. You also have to take into account of the summer of love where Democrats, Black Lives Matter were, you know, throwing Molotov cocktails at police stations, tearing down national statues, you know, setting cities on fire. You know, in my home State of Texas, a guy was chopped with a machete in public street. I mean, there was a lot of stuff going on that was a concern, and so I'm sure the President wanted to make sure that people were safe when he said that.

Q But violence in the way you just described, I'm trying to get a sense of perspective. That like that happened in November and December at the rallies, had it?

A No.

Q Okay.

A No. But to my earlier point, there had been, you know, months of things that had been happening to people, and years if you're a Trump supporter. When you have sitting Members of Congress calling on violence against Trump supporters and having them thrown out of restaurants, you know, we all operate on, you know, years of potential issues and conflicts.

Q So the President says the number 10,000 National Guard troops, and who's in the room at that point that you remember?

A Max Miller was still sitting across from me at the time, and I don't know if there was anybody in the back of the room.

Q Okay. And so do you know as you sit there whether the President ever conveyed that to anybody who could make that happen to have 10,000 National Guard troops there on the 6th, from your personal knowledge?

A My personal knowledge, no, but I did see it come out in a report somewhere.

Q All right. I think you're referring to The Epoch Times article that came out in February of 2021?

A Maybe that's it. I did see -- I did see that number come out in the news at some point, yes.

Q Okay. And so, while you were in the dining room, the President didn't make any -- did not make any sort of order to anyone to have 10,000 troops deployed that you saw or heard?

A I mean, unless somebody was standing in the back of the room and he was directing them, I don't know.

Q Right. So, I mean, again, I'm only asking your knowledge.

A He said, I want 10,000 National Guard. That's what he said. I don't know who else heard him or if anybody else was in the back of the room. I don't know.

Q And Mr. Miller's response was what?

A He says, Well, we should only call the Guard if we expect a problem. And then that's when the President said, Well, are we going to expect a problem? I said, well, there have been some instances, and that's when he said, no, we need to have the National Guard there so that there isn't a problem.

Q And what was Mr. Miller's response to that?

A Basically, okay. I mean, he didn't say anything. There was no -- I don't recall any specific pushback or disagreeing, so -- but, again, that's not my lane. I stay in my lane.

Q Well, if we look at Mr. Miller's lane, if we look at exhibit 37 --

A Uh-huh.

Q -- and these are Mr. Miller's text messages with you. They're ones that he produced just because, again, they're in the format that are a bit easier to follow.

A Sure.

Q And you see it starts with January 4th at 4:08 p.m. --

A Uh-huh.

Q So according to the log, it's right after your meeting would've ended with the President. But do you recall actually walking out with Mr. Miller when the meeting was done?

A I don't think I did, no.

Q Did you have his --

A I don't recall walking out.

Q Did you have his phone number before then?

A Yes.

Q You had, okay.

A I think I did.

Q So the first -- the message we have here you send after the meeting ends is you popping -- it's an emoji with you popping a bottle of champagne, right?

A Yes.

Q Okay. And, you know, his response to follow up on that is, you did a great job killing some of those speakers, consistent with what you just talked about, about dwindling the list down, right?

A Yes.

Q And then -- okay. We can follow down. I can read, you say, Hallelujah, Praise the Lord Jesus, Amen. And he responds, Hahaha, crushed it. And I'll continue there. But why were you celebrating coming out of there and praising the Lord, because it -- coming out of the meeting because it doesn't sound like he pushed back on any of your ideas, the President that is?

A No. For me, I was relieved, because I was being led to believe that he was wanting these people. And when I realized that it wasn't him at all, I felt so relieved, so I was just very happy, and it didn't even take much work. And I was just thrilled that I could now go and tell everyone, Here's what's going to happen.

Q All right. Now, you continue on -- he continues on, Max does, but, man, he thinks a million people are coming. Oomph. And you say, I tried to help manage expectations. So did the topic of crowd size come up?

A It may have, because it always comes up with him. He probably said about a million people just because of the last couple. I don't remember specifically talking about it, though.

Q All right. And he tells you, You did manage expectations. But then his next comment is, Just glad we killed the National Guard and a procession. And you do a heart emoji on that.

A Yes.

Q And so at least the way Mr. Miller is conveying it to you is he's saying, Kill the National Guard in a procession. So did you leave the meeting thinking both the procession and the idea for the National Guard were killed?

A No, I left the meeting with -- the procession was my concern with him wanting to go with the people. I don't even know why he said Kill the National Guard, but, no, I was more thrilled about, you know, him not walking and then being happy about the speakers list.

Q Well, on the National Guard, could it be that it was killed there in the room, that they were shot down and Mr. Miller told the President it's not going to happen?

A It could've been. That's a question for him though.

Q Okay. You just don't remember that?

A No. I mean, I was more concerned about getting back to my people. And then I was like, oh, my gosh, I didn't get a picture. I see that there.

Q But on that point on the next page, page two, at the bottom you send him that night, you send to Mr. Miller at 8:09 p.m. a link to an article from Politico about D.C. National Guard activated to respond to pro-Trump protest. Do you see that?

A Yes.

Q And I think that's your, I don't know, is that a laughing emoji -- I don't -- that you send after that?

A Yes, he always gets what he wants basically is what that says.

Q Okay. Well, this wasn't him. If we look at exhibit 38, it's the Politico

article.

A Uh-huh.

Q And do you see that? That's the article you sent.

A I do. Yes.

Q It's on the 4th. And it starts at the bottom of the first page, the D.C. National Guard has been activated to respond to protests expected this week in the Capitol when Congress certifies that President-elect Joe Biden has defeated President Donald Trump, city officials said at a news conference on Monday.

And it continues, D.C. Mayor Muriel Bowser requested that city's National Guard support local police in handling the influx of people expected in D.C. on Tuesday and Wednesday.

And if you continue on down that same page, you see that it says, About 340 personnel will be activated to assist police with controlling crowds at Metro stations and enforcing street closures, the National Guard said in a release.

So this article talks about Muriel Bowser requesting on behalf of the city, right?

A Yes.

Q And only 340 troops?

A Yes.

Q All right. And then going back to your message with Mr. Miller in exhibit 36, and we go down to the page -- we can go to page three. So after you send that, yeah, right there, Mr. Miller responds to you, You know, haha, I know, I fucked myself, but chief already had said no for days. The man is never wrong.

A Uh-huh.

Q So when he says that I fucked myself, that seems to suggest that he did, in fact, tell the President the National Guard wasn't needed. Did you understand that to

be what he was saying?

A I did, because he was the one that said we only need to call the National Guard if we expect a problem, yes.

Q And then he continues on, but Chief had already said no for days. Did you know who he's referring to when he said chief?

A I assumed it was Mark Meadows.

Q And during that meeting with the President, did Mr. Miller, in fact, talk about that Mr. Meadows and Mr. Miller had been talking about the National Guard for a few days?

A No.

Q And then the next part, The man is never wrong, did you understand that to be a reference to the President?

A Yes, and that's why I said never.

Q Okay. I'll stop there because we're moving on and just see if there are any questions up until this point from anybody else about the National Guard or the procession or the things we've talked about up to this point.

Okay. I don't see anybody that they're going off mute.

Did you want to take a break? I think we'll be done by 2:30, Dave, if you want to just keep going, or do you want to take a 5-minute break?

A I could keep going.

Q All right.

Mr. Warrington. We can keep going.

BY [redacted]:

Q All right. Now, one of the -- if we look -- then we'll go back. I haven't looked at it yet, but exhibit 32 are your text messages with Dan Scavino.

A Okay.

Q Excuse me. If we go to page 3. Did you see Mr. Scavino in the White House while you were there at all?

A No.

Q All right. And since you had been talking to him about this meeting, it seems natural that you update him after it was done, right?

A Yes.

Q All right. And so 5:39 p.m., you text him, He basically -- and this is on January 4th -- He basically pushed everyone to another stage, which is fine by me, but he did ask me to check with you on Ali. Sorry.

And then you follow on, And I'm going to move forward moving them all unless you tell me otherwise, that way you don't have to answer.

So, did you understand Mr. Scavino still being interested in having people on the stage at the Ellipse that maybe you didn't want to be there, and that's why you're asking him this?

A No, I asked him because the President asked me to, but he had already told me that he had not -- that he had said -- or talked to anyone about that. So I'm going back to him as the President asked me to, and I was just going to implement what the President said. And as you can see, it takes Dan a very long time to respond. And I told him that I'm just going move forward unless I hear something else.

Q Specifically, the President told you to follow up on Ali just because he was a Twitter guy?

A Yes, social media.

Q And then Mr. Scavino, Dan Scavino writes back to you, I guess it's now the very early morning of January 5th at 4:23 a.m. And I'll just kind of -- Hey, sorry, been out

of pocket on this cell. Just got in from Georgia a couple hours ago. He brought up Ali. Just keep him on stage not associated with POTUS or main event, POTUS said. We talked about on our -- on way back.

So when he -- when Mr. Scavino refers to "he" bringing up Ali, did you understand that to be President Trump?

A Yes.

Q All right. And the event that they had traveled -- they were traveling back from, was that the Georgia rally you've talked about?

A Yes.

Q And so consistent with what you wanted and now hearing from Mr. Scavino confirmed by the President, Ali would not be speaking on the stage on the 6th at the Ellipse, right?

A Correct.

Q And did you -- you conveyed this to Caroline and everybody else involved in organizing?

A Yes, I did.

Q And just how was that received by Caroline?

A She was not happy at all. In fact, she rejected the entire premise of the President's request.

Q But was she able to do anything about it ultimately?

A I'm not sure yet. Ultimately, she was not supposed to be able to do anything. But, I mean, she was not happy about it, and it's my understanding that she was not going along with it even after I sent out the instructions from the President.

Q And the part about Ms. Guilfoyle being taken off the speaker list, did that draw a reaction from Caroline as well?

A Caroline didn't say anything, but I did receive a call from Kimberly, or text message and a call from Kimberly.

Q And in a nutshell, what was that discussion and the text about?

A She asked me if -- I mean, obviously, Caroline told her, and she asked me if I took her off the list, and I said no. She asked me if I was speaking, and I said, no, I'm just introducing. And she was trying to make a case for herself to speak, and I just told her that the President is, you know, on his way to her, and she should just talk to him about it.

Q Did Ms. Guilfoyle claim to have been involved in raising the money for the event?

A Yes. After that, she did explain that she had a donor who raised a lot of money for this, and, you know, she wanted to speak. And I just told her again, you know, there's a list of people that were sent out, White House didn't approve, and that's when she responded with that's the list we approved. I told her that, you know, nobody knew about that, and she just needed to take it up with him when he got there.

Q And when she said "we," she was referring to her and Donald Trump, Jr., right?

A She was referring to her and Caroline.

Q Okay.

A To my -- that's the way I understood it.

Q Okay. Okay. Well, on that point then, did you ever speak to Donald Trump, Jr. about the event before the day of yourself?

A Before, I don't think I spoke to him until the day of. I don't recall speaking to him until the day of.

Q Okay. And at that point did you talk to him about these folks that had

taken up so much of your time, Ali Alexander and Alex Jones? Did that come up?

A No. My assumption was that his political team would have probably told him, but I don't know that.

Q And you're referring to Mr. Surabian and Mr. Schwartz?

A Correct.

Q All right. And you had kept them up to date on what had happened at the White House?

A Yes.

Q All right. On this point about whether Ms. Guilfoyle told you that she and Don Jr. approved the list, do you remember texting with Lara Trump about the event and what had happened with Ms. Guilfoyle?

A You mean she and Caroline?

Q No, the question I had asked about whether -- because we'll get to that. But I'll ask this, were you texting with Lara Trump about this?

A Yes, I kept Lara up to date on the craziness of Caroline.

Q So if we look at exhibit, it's been marked as 47. You produced this. It's your text messages with Lara Trump?

A Yes.

Q Okay. And if we go to January 5th at 8:14 a.m. on page two -- right there. Oh, you passed it. Go back up. Right there at 8:14 a.m. This might help with your memory. Do you see there that it says, You tell Ms. Trump, Kim said that she and Don approved. I said, well, don't. So does that remind you that Ms. Guilfoyle told you that she and Donald Trump, Jr. approved the list?

A Yes. She was trying to make it seem like she and Don Jr. approved, but I know she meant me and Caroline, because she and Caroline were the ones that were

working on it. And after speaking to Andy and Arthur, I knew that it was not Don.

Q And Lara's response is, My God, did you tell Eric this? And you said, if you look down, No. And she says, You should have. And your response is, I didn't want him to worry about it. I dealt with it, and I'm not going to let them bully or flash money to embarrass the family for their benefit.

A Yes.

Q And on that point about having to tell Eric Trump, I think if we look at exhibit 2, your phone records, if we go to page five, towards the bottom, right there on the -- if you see on January 5th at 8:42 a.m., you get a call from Eric, so it would appear, from what I can tell, to seem that Ms. Trump told him to call you?

A I don't know if she told him to call me, because I think that call was more of what time do I need to be there? What time am I speaking? It was more of a logistical question. It wasn't about any of the drama.

Q Right after you were talking about -- with Lara about all the drama?

A Yeah. I didn't talk to Eric about drama.

Q And they -- he and his wife did show up but not until January 6th. They weren't there on the 5th, is that right, to your memory?

A This day of -- yes, the day of.

Q Okay. Your -- when you are in D.C. -- you were in D.C. January 5th, you stayed there after your meeting with the President?

A Yes.

Q And also there on the 6th, right?

A Yes.

Q On the 5th, did you go out to any events the night of the 5th that were being held around town?

A Not that I'm aware of. I was injured, so I spent most of my time in my apartment.

Q There was an event at the Trump Hotel in downtown D.C. that Caroline put on. Were you aware that the event was taking place at the time?

A Yes.

Q And what did you understand about the nature of that event and who was attending?

A She mentioned to me that she was hosting an event the night before that was going to have donors. I don't remember the specifics. I know that she had invited Attorney General Ken Paxton, and then after everything that had unfolded, I reached out to him and asked him not to go because I wasn't sure of what all she was doing.

Q Did any of her other conduct come to your attention that night that gave you concern, the night of the 5th?

A So the night of the 5th, I believe that is when the credential came up missing. I believe it was Kylie who alerted me. Someone alerted me to the credentials coming up missing. I reached out to, I believe, Justin and Megan to try and figure out, since they were in charge of operations, what was going on. I don't remember which one, it might have been Megan who told me that Maggie came and got the credentials and took them over to the Willard. I still don't know why, but she did take the credentials, and then there was a scramble of trying to get some form of bracelet or band or something so that people could actually -- so that their own people could get into the event.

Q And just so we're clear for the record, the names you just mentioned, when you say Justin, is that Justin Caporale?

A Yes, sorry.

Q And Megan -- no, it's okay. And Megan is Megan Powers?

A Yes.

Q Maggie is Maggie Mulvaney?

A Correct.

Q And Maggie was working with Caroline on this event?

A Yes.

Q All right. And did you understand the taking of the credentials to be, I don't know, a retaliation, so to speak, or whatever you want to call it for -- that Ms. Wren not getting the speakers she wanted on the 6th?

A Yes.

Q And do you recall having told Mr. Miller, Max Miller, after the President's speech, you provided some potential mentions for the President to have in the speech, you know, to include the name of the donor, Ms. Fancelli. Do you remember having done that?

A I do remember that.

Q And then, I could show you the message, but kind of late on the night of the 5th, you end up telling him, Please remove the donor's name. Do you know why you did that?

A Because I was done with all things Caroline.

Q So the morning of the 6th, fair to say you woke up to learning that there was some more drama actually at the location of the event?

A Yes, at the Ellipse itself.

Q All right. And briefly, what was the nature of that and what did you do to address it?

A Well, I had not slept, so I think it was 5:00 or 6:00 in the morning. People

were trying to get set up. I believe VIPs were showing up, couldn't get in. But the first thing that I was alerted to was that Caroline was rearranging names on seats, because there was a concerted effort to keep her people away from the stage. Just based upon previous actions, we were trying to prepare and prevent something similar from happening of them trying to get on stage, so they put them a few rows back. But that morning, and I believe they got some cell phone video of that because I asked them to get it on video, of the names being rearranged, and somehow, they all ended up on the front row.

Q So people like Alex Jones and Ali Alexander ended up in the front row?

A Yes.

Q All right. And so how did -- just how did you respond to that, or what actions did you take?

A I believe I reached out to Max Miller. I couldn't tell you if it was before or after or what. It was just -- that whole day was a mess, and I asked him for options. I needed options to deal with any type of potential incident that may or may not unfold. I just needed to be prepared. And he gave me several options: one being pulling her credential; the other being, you know, making sure she's not pinned, which I did; and another one -- I said, No, I need something stronger than that, because I felt, like, she was really going to continue to push. And then once he told me that I could call the National Park Service's police, that's exactly what I had them do.

Q Did the police end up taking Ms. Wren away, or was it resolved before that happened?

A Well, when they showed up, because I specifically asked Kylie to call them and I stayed on the phone the entire time, because I was not on site yet but I was en route, and they showed up, and then Kylie informed me that she was now allowing

people to come in and people were starting to move. And I was going to make the call once I arrived and could physically be present and see what was happening.

But by the time I got there, Maggie Mulvaney approached me as I arrived on the -- before I reached the Ellipse, and she just was profusely apologizing to me, saying, I'm so sorry, I don't know what's going on. I had nothing to do with it. And I just told Maggie, I said, Maggie, it's fine, just let me deal with this.

And then I walked up to the event location at the Ellipse, and then Justin Caporale came up to me and says, Please don't do this. And I said, Justin, we cannot have anything bad happen today. Do you understand how serious this is? And he goes, I know. He says, I will take full responsibility for Caroline. Please don't do this or she's going to pull money from the event. And I said, No, she's not. She's not going to pull anything from the President's event. We cannot let anything bad happen today.

And I'll just back up real quick. When I asked Kylie to call the police, she was concerned that it was going to make a scene, and I said I'd rather have a scene at 7:00 a.m. than 11:00 a.m., something to that effect. But Justin really did beg and plead and said that he was going to take full responsibility for her and watch her like a hawk.

And Justin Caporale was the one that I told that she should not have a pin because I didn't want her having any stage access to get her people on that stage, and he agreed with me. And I said, Okay, Justin, for you, I'll let her stay, but if she makes one wrong move, I will have her escorted off the property. And he said, Okay. And that's why they did not remove her that day, and I regret that.

Q There was several speakers that ended up talking on the stage that weren't on the list that came out of your meeting with the President, one was Mr. Cawthorn, which we spoke about, but also Kim Paxton, who the President had crossed off. Do you know how he ended up speaking that day?

A Yes. I allowed Ken Paxton to speak on the stage because there were, to your point, you know, other people that somehow got on the stage, and I was not going to allow a sitting attorney general not speak when some others were allowed to speak.

Q And had you understood Caroline had essentially promised him that he would be able to speak and he had come to D.C. for that?

A That is correct.

Q The other people that spoke that weren't on the list included Rudy Giuliani and John Eastman together. Do you know how they ended up on the stage?

A I do not know.

Q Vernon Jones ended up on the stage. You had a text message exchange with Mr. Meadows about him. Do you recall that and how he, Mr. Jones, ended up on the stage?

A Well, I received the text after the fact because Vernon Jones was already on the stage, which is why my response to the chief in text message was, I would've said no, but it had already happened. But the chief still says that he defers to my judgment. And when I showed Justin Caporale that the chief deferred to me, I said, then who is putting these people on the stage? And Justin said, I don't know. It's coming from the top. If it's not the chief, then who's doing it? So I don't know to this day who was allowing those other people on the stage.

Q There's been reporting that Ginni Thomas, the wife of Supreme Court Justice Thomas, was at the rally. Did you see her there, or know that she was there that day?

A I don't recall seeing her, but in fairness, I had really one focus. My attention was fully on one entity, so I -- I don't remember seeing her there.

Q Did you understand her to be coming before that day? Had anybody told you she'd be there?

A I mean, I don't recall her name coming up at all.

Q And that includes with anything having to do with rally planning for that day?

A Yeah, no, none.

Q I think there's been an article, maybe in Rolling Stone again, that says that Ms. Thomas was brought in to help mediate disputes between the groups, a role that you've described as you yourself having. Did anybody talk about Ginni Thomas playing that role with regard to January 6th?

A No. I can tell you that I did not speak to or work with Ginni Thomas this entire time. Rolling Stone is likely going to be sued.

Q Or hearing about her at all?

A No, she didn't come up. I don't know Ginni Thomas, so I -- I would probably remember if she was helping.

Q Now, after -- do you know Alexandra, I think it's Preate, P-r-e-a-t-e?

A I know who she is, yes.

Q All right. And who -- do you know her to be connected in some way with Steve Bannon?

A Yes, she used -- I don't know if she still does, but she used to work for him.

Q All right. Did you see her on January 6th at the event?

A I don't remember seeing her. The only reason I know she was in D.C. was because of a conversation I had with the Kremers.

Q And what did they tell you about that?

A They had some falling out with Dustin Stockton and Jennifer, and Dustin had mentioned something about Alexandra inviting them up -- inviting him up to one of the suites they were in. I don't know. It was more of their chaos and drama, but that's the

way I knew that Alexandra was there because Dustin had mentioned that she had invited him up to the suite or a suite.

Q Up until that point, had you heard anything about Ms. Preate being involved in any way with the rally planning?

A No.

Q We've raised with Mr. Warrington and provided to you that -- text messages between you and Mr. Meadows that we've received from Mr. Meadows as opposed to from you. And the only difference between the two was one message that you sent. It's undated in what we received from him, but this -- I'll read it.

It's FWIW -- this is in exhibit 10, page 3, but I'll just read it as they pull it up, but FWIW, so what I understand to be for what it's worth, Bannon's people were helping Caroline with the Jan 6 disaster. Is that a message you recall sending to Mr. Meadows?

A It sounds like something. I didn't have it. We actually looked for it, and it's not in mine, but it's not unlikely that it's -- I just don't have it. But I do recall mentioning that, yes.

Q And so what did you mean by that?

A That was the Alexandra Preate reference after speaking to the Kremers.

Q But based on that, just based on that -- the discussion you had with them, that was the sole basis about them -- Bannon's people helping Caroline?

A Yes, based upon their interaction with Dustin and him going up to the suite, and they had some big fallout between those two, between them two, between the Kremers and Dustin.

Q And why would that be --

A I think --

Q Oh, go ahead.

A Because Dustin had mentioned something about -- and this is probably a better question for the Kremers, but Dustin mentioned something about they were trying to get him to turn on them, meaning turn on the Kremers, I don't know, something about the event.

Q And why was this important information to give to Mr. Meadows?

A Because there were reports about -- I had not -- I don't keep up with Bannon or War Room or any of his shows, but I had saw that there was a report that he said something about being there January 6th, which I didn't even know he was there. So it was just a reference, because I knew that he knew Bannon.

[2:05 p.m.]

BY [redacted]

Q When it came time for the President to arrive, did he arrive on time?

A He did not.

Q When he finally -- when he did get there, where were you at that point?

A I was backstage. And his delay is the only reason I ended up speaking that day, because they needed to fill in space. But by the time he arrived, I think I was in the back of the stage, because when he walked in, I was standing there.

Q So what's sometimes referred to we've heard as the offstage announce area, is that where you were when he pulled in? Or do you know it to be called that?

A Well, there's two sides. So I was on -- so in the back of the stage -- I'm trying to remember now -- there was -- there was an offstage where there were TVs and speakers were setting up. But then there was on the other side, there was like a tent area where you -- where they could walk through, where the President was going to walk through. And I was on that side.

Q So when he got out of the motorcade, you were essentially right there to greet him?

A Yeah. We call it the receiving line.

Q And did you talk to him as he came through the receiving line or hear him talking to other people?

A Yes. He walked up, pat me on the back, and said, Oh, this looks so great. This is the biggest rally we've ever had.

Crowd size, typical. He was excited about that. And he just seemed normal, and just started shaking hands and saying hello to people.

Q Who do you remember being there from the White House at the same time? Staff.

A This is tricky because I've seen pictures since.

Q As best you can recall.

A Yeah. I think Dan was there. Kayleigh might have been there. I just remember everybody was saying, oh, the crowd looks great. It looks good. The music was loud. I remember seeing one of Ivanka's staffers.

Q Was Mr. Meadows there?

A Yes, he was there.

Q And did the President comment -- as you looked out on the crowd, Ms. Pierson, there was the area of the stage that was within the security perimeter on the Ellipse, right, where people actually had to go -- they had to go through magnetometers to get in?

A You know, I don't even know the logistics of how they did that. That would be a Justin question.

Q All right. But fair to say there's an area that was kind of fenced in that was controlled by the Secret Service or security. Is that right there in the front of the stage?

A Yes.

Q And then, fair to say there were a lot of people that were not in that part that were back, in fact, going all the way back to the Washington Monument?

A Yes. That's correct.

Q And do you remember the President saying anything when he got out of the car about the fact that there were a lot of people that were not within the area close to the stage but rather were all the way back?

A No, he didn't mention that to me.

Q Was Max Miller back there around you at that time? Do you remember seeing him?

A I don't remember.

Q Was there any discussion about concern that so many people were there that hadn't come into the secure area of the -- for the event and were out there by the Washington Monument and other places?

A No. I just assumed that that's how they set it up. I didn't have -- I wasn't involved in those discussions.

Q Okay. So the President tells you he's happy with the crowd size or, otherwise, it's looking good. Does he say anything else, before he goes to get up on stage, to you?

A Things like isn't it incredible what they're doing. I mean, it was more about -- he talked about the vote at the Capitol. He talked about preparing the arguments. It was just more of a general discussion of, you know, maybe they'll hear the case today and, you know, just nothing really specific.

Q Did he talk about Vice President Pence?

A Good question. He may have. I just don't remember.

Q Anything else you can remember that he was talking about?

A Nothing specific that I can recall.

Q Did you hear him bring up at that time the idea of going to the Capitol after he was done speaking?

A I don't remember talking about that.

Q Did you hear him speaking about it with anybody else?

A No. He said it on stage, but I don't recall any discussions about that in the back.

Q And were you with him the whole time he was in the back or did he move through the receiving line and move towards other people?

A He moved towards other people, was saying hi. But then I went back to the other side just to make sure things were okay.

Q So after he -- did you stay there at the Ellipse in the backstage area while the President was speaking?

A Not fully in the back. I mean, it was freezing cold that day, so you'd go out front and, you know, just sit there and watch him speak, but then you'd have to go back behind the tent to kind of warm up. So I was sort of in and out of the tent.

Q But were you there for the entire speech?

A Yes, I was.

Q And did you hear him say during the speech, did it register with you that he was going to go to the Capitol himself?

A To be honest, I don't even remember until people were talking about it after the fact. I think I was just in a state of relief that the crazy people didn't get on stage. I was pretty much almost checked out at that point. It had been a very stressful week.

Q Well, let's just -- we're almost done. If we look at exhibit 41, these are your text message with Taylor Budowich and Arthur Schwartz.

A Okay.

Q And if we look at the bottom of page 2, you see at -- on January 6th at 12:40 p.m., Mr. Budowich texts --

A Yes.

Q -- "Is POTUS actually walking?"

At 12 40 p.m., the President was actually still on the stage. Do you remember that?

A I don't know what time it was, but I'll take your word for it.

Q He was.

And then you responded, if you go down to January 6th, at 12 40 p.m., "They just clashed with police."

And you say: No, they wouldn't let him. But they have a plan for him if he wants to go.

So two things there. This notion of having a plan for him if he wants to go, was that about the President going to the Capitol?

A That's what that would have been, yeah.

Q Okay. And who had a plan and how did you know about it?

A It could have been a discussion with Max. And I know some of that came from being in the back with the tactical team when they were saying -- when they started shuffling and they said something, like, oh, they found a bomb at the -- I don't know if it was the RNC or DNC at the time. And they said to me, Well, they're not going to let think anybody go to the Capitol.

And I was, like, They're going to the Capitol.

But that would have been for him being POTUS. Because what I'm told is, just generally, when it comes to the President of the United States, they have a number of plans and all kinds of contingencies if the President wants to do something.

Q Okay. But in terms of just going to the Capitol with protesters, did you know them to have a specific plan about that?

A No. But, I mean, he did a drive-by once and he did a flyover another one. So it was safe to assume that if he wanted to go, he could.

Q Okay. But that's what it was. It was an assumption based on your knowledge of prior events, not about what someone specifically told you?

A Oh, right, yes. That's correct.

Q Okay. When the President got off the stage and was done with the -- was done with his speech and got off the stage, were you in the backstage area to see him?

A Yes. Because he walked out. Yes, I was back there.

Q All right. And before he -- before he had come down off the stage, had you seen Alex Jones and Ali Alexander leave the Ellipse?

A I didn't see it at the time, but I saw it on video after the fact when everybody was, like, retracing steps.

Q All right. And what you saw is that they left actually while he was still speaking?

A That's correct.

Q And did you see that was Caroline who led them out?

A I didn't see that, but I'm not surprised.

Q So what, if anything, did you hear the President say once he's off the stage and before he gets into his car to go back to the White House?

A Not much, because at that point, the tactical team was just moving him, because, again, like, they were hearing things in their radios. I couldn't -- I wasn't privy to all of it. But he left and just said, Great job. You did a great job. It was a great crowd.

And that was it.

Q Okay. Where did you go after the event was done?

A Back to my apartment.

Q Had you had any plans to go to the Supreme Court stage that the Kremers had?

A No. I could barely walk. No.

Q By the time -- I know they had heard about the bomb, that is, the tactical team. Had you heard about -- it seems like from your message with Mr. Budowich you were aware there was also clashes with police at the Capitol by this point.

A Yes. If you got on Twitter that day, people were live tweeting everything, and they were posting videos. So everybody was trying to keep up with what was happening because there was just so much activity going on.

Q So once you got home, did you leave for the rest of the day?

A Did I leave at all once I got home?

Q Well, I should have been more precise. While the violence at the Capitol was ongoing, were you home the entire time?

A Oh, yes, I was at home.

Q Okay. And did you, yourself, ever go to the Capitol during that time?

A No.

Q All right. We can look at --

A I was actually asking people not to go to the Capitol because I had no idea what was going on.

Q But you and Mr. Miller, if you recall, started texting about what was going on while it was happening?

A Yeah.

Q So if we look at exhibit 37, and we go to page 19 to start. So January 6th by 1:57 p.m., as you saw from your earlier text messages, the violence had already started. And then Mr. Miller says: This is going to get nasty.

And your response is: Well, duh, and an emoji.

And then you say: When they said they couldn't go to the Capitol, I told them that there would be nothing from stopping this crowd from going to the Capitol.

And I know you mentioned earlier, but what did you mean by that in terms of why they couldn't be stopped?

A Well, when the tactical team said that, that's what I told the tactical team, because those people were going to the Capitol, regardless.

Q Regardless of what? Of what anybody said?

A Yeah. Those people were going to the Capitol.

Q And if you go to page 20, you know, Mr. Miller is talking about how bad it is. Are you watching events on the TV or are you following on your phone? How are you capturing what's going on?

A I think I might have had the TV on, and I was sort of scanning to try to get live tweets, because there was so much conflicting information. If you're watching the news, you're seeing the bad stuff. But then if you're looking at some of the feed coming in through Twitter, you're seeing the opposite. You're seeing police officers, you know, moving the gates and opening the doors for people. So at that time everything was unfolded, it was very confusing to follow.

Q But Mr. Miller doesn't seem confused. He says: It's like a fucking revolution.

Then you say: Yeah, so crazy.

And so at least from some of the images you were seeing, it looked like a revolution to you?

A Yes.

Q And you say I -- you know, I figured -- you had said earlier before that I didn't expect it today but eventually.

And then coming back to this: I figured it would get 3 to 6 months into the Biden administration, but it didn't even get to the freaking vote today.

A Yep.

Q And Mr. Miller says: Like a bad dream.

And you say: A 5-year nightmare continues.

What is a 5-year nightmare? What did that mean?

A This is the continued attack on half of this country, you know, on top of the lockdowns, but the assaults and the lost livelihoods and elected officials, calling for attacks against people. It's basic psychology. You can't continue to, you know, beat people down, take away their rights, tell them they can't go to church, and then there's hypocrisy all around. I mean, people get this way.

And that just comes from a background in the medical field, and it's just -- it's very upsetting. It's one of the reasons why I do what I do, to give people the outlet to have their voices heard, to, you know, validate the way that they feel and try to work in a way to try to channel the frustration positively, which is why I always focus on elections.

Q And you follow on: And this is why I thought fought so hard to keep certain people off that damn stage.

A Yep.

Q And on to the next page, page 21, Mr. Miller says: This is loony tunes.

And then this message that you share with others similarly is: Good news is that I was able to keep the crazies off the stage. I stripped all branding of those nuts and removed videos of all of Caroline's psychos so nothing could touch POTUS directly.

And Mr. Miller's response is: Thank God.

So what were you conveying with that? Or just put more color on what you were trying to say there.

A Oh, absolutely. I mean, because the media, without a question, was going to try to pin the actions of other people on him specifically. And that's just been the

nature of everything that we've been through over the last several years. And that is one of the reasons why I fought, as I've explained previously. You always have to police your own crowd, because one bad thing, that's the only thing the media is going to focus on, and they paint your entire movement with that broad brush. And that's exactly what happened.

Q And you continue on below, further down. To that point you say: This would have been worse.

If you keep going down, yeah.

This would have been worse. That's a fuck up. This would have been Trump planned it.

A Exactly.

Q And then you continue on: I didn't know what was going to happen at the Capitol. I knew it wouldn't be good, and that's why I could not be flexible at all on this one.

So when you say you knew it wouldn't be good, what did you mean?

A Meaning, given the nature of the people that were involved, I didn't expect anything good to happen. But the two previous events that have taken place, the attacks that took place, the nature of what was happening at the time, the emotions that were running high, that's why I just told people don't go to the Capitol.

Q Okay. And that note about, you know, taking credit and saying that's why you fought so hard to keep these people off the stage and strip all the branding, I mean, it's why you sent that also to Mark Meadows.

A Uh-huh, correct.

Q And Mr. Scavino?

A Oh, I'm sure, yes.

Q Okay.

A It was basically an I told you so.

Q Yeah. I told you so to them, or what were you trying to reflect?

A Just making the point that, you know, entertaining these types of people makes it so much easier for the press to just make a direct link to you. Because the press really wouldn't be interested in who the people are or what really happened. They would just want to try to pin it on Trump or us for that matter.

Q So if you look at page 27 -- we're almost done with Mr. Miller's. At the top there, this is still January 6th. So everything's -- or, actually, this is the day after. This is January 7th.

It's January 7th, and you say to Mr. Miller: Let me know if you guys need anything. If he wants to lead the modern revolution -- then you put in quotes -- "peacefully," I'm down. There has to be a strategy. I'm going to lean in, regardless, once the dust settles.

He should declassify the swamp.

What were you trying to say there?

A Meaning that what was happening was not cool, and if they want to keep, you know, trying to make America great again, I'm happy to do so, if there's an actual strategy in place; no more of this, you know, winging it and nobody knowing really who's in charge and doing things. And declassifying the swamp means there was a big push for him to declassify a bunch of things, and that's what that meant.

Q What in particular? I'm just not familiar. Declassify what, and how does that relate to what had just happened?

A Well, for example, like, there was a big push to declassify some of the Russia stuff, that's now since been debunked, just to let the American people know that the

government was not our friend. You know, they're not working on our behalf. They're actually hurting us in many ways, and some of that stuff would be in there.

Q And when it said if -- you said, "If he wants to lead the modern revolution, quote, 'peacefully'," why did you put peacefully in quotes?

A Because I wasn't down with what was happening.

Q Oh, that was a way to emphasize the word?

A Yes. That was me saying I'm ready to keep up the fight to make America great again but only this way, not whatever's happening.

Q And did you at the time think that Mr. Trump had any responsibility for what had happened at the Capitol?

A At the time? No. I mean, I believe that adults are responsible for their own actions.

Q Regardless of what people might say to them that might have an effect on their actions?

A I mean, I get mad and I get -- no, I don't think anybody could just go and scale a wall at the Capitol, no. That's somebody's decision.

Q Yeah. Just trying to understand with the concern about Ali Alexander and Roger Stone and Alex Jones saying things, one of the concerns you raised was that their language could, you know, promote or lead to civil unrest, so kind of acknowledging the fact that what people say, that their words can matter. Is that fair?

A Well, it's absolutely fair. And, you know, to take that further, because if something bad happens, we're going to get blamed, not the individual that is actually doing the bad things, but they would just try to put it all on another individual.

Q And I'm -- and just trying to circle back so that when I asked -- I understand President Trump didn't go to the Capitol. But when I asked --

A Right.

Q -- did you think that what he said was responsible in any way for what happened at the Capitol, you said that people are responsible for their own actions. And so I was just circling --

A Yes.

Q -- the point that, you know, you had said earlier people's words do matter. And so --

A Yes.

Q -- I'm asking about President Trump's.

A I will say -- I will say that it didn't help, but I'm not going to say that he's responsible.

Q And echoing these themes, it's a conversation you had with Brad Parscale, which I think is the last part of this. And I know you produced your text messages with him, and we can turn to them at exhibit 45.

And what was the nature of your -- or what is the nature of your relationship with Mr. Parscale?

A Brad and I met during the first campaign. Both living in Texas, being born in Kansas, we kind of became really good friends. And he wasn't as political, and so I've kind of helped him learn some of this process. And over time, I became very close to him and his wife, and so we're kind of like brother and sister now.

Q And he was in charge of the reelection campaign up until a point in the summer of 2020, right?

A Yes.

Q And then after he left, was he running a company called Nucleus?

A Yes. He was building it, yes.

Q Building it. And what -- just so I know it's for context when he talks here, what does Nucleus do?

A Nucleus is a, what do they call it, a campaign -- we call it a campaign in a box, basically, eventually like a competitor to like a CellForce.

Q And by the time of the events of --

A A competitor to a CellForce. It's the name of another company.

Q And could send out political messaging and have -- you could have a network of people supportive of the President or whoever is running?

A Messaging, events, fundraising, digital, ads, legal, everything was in one package. And that's pretty much what Campaign Nucleus does.

Q And by the time of planning for the January 6th event, you recommended to Kylie at one point to think about using Nucleus to crowd build for the event. Do you remember doing that?

Are you still there?

A Yes. Can you hear me?

Q Yeah, I could not. I'm sorry.

A Oh. I said yes.

Q Okay. And for the same reasons you just mentioned that they -- because of the network and contacts, Nucleus could have helped them, you know, in the crowd-building efforts and reaching a lot of people?

A Yes. And that was the system that I was familiar with.

Q So the text messages that we have here at exhibit 45 are Mr. Parscale are really focused on the evening of January 6th.

Was Mr. Parscale at the Ellipse event to your knowledge?

A No.

Q And if we look at page 2, I think the two of you have what seems to be a pretty frank conversation about what you're observing and your takes on it.

A Yes.

Q And at 7:14 p.m., if you zoom, if you can zoom in a little bit. There we go.

Mr. Parscale says to you in his third message at that time: This is about Trump pushing for uncertainty in our country. A sitting President asking for a Civil War.

Did you agree with that sentiment that he was expressing?

A No.

Q All right.

A Brad was upset and emotional, as he should have been. But, no, I tried to calm him down.

Q And we continue on to page 3. And at 7:17 p.m., he says: I have -- if you go down -- I have lost faith.

And as you said, you're trying to encourage him. You say: I'm sorry you feel that way.

And he follows up to say: In Trump.

And your response is: "Just now," with an exclamation point and three question marks.

Why was that your response to him saying he lost faith in Trump and it seems to you being surprised he's saying just now?

A Because of how he made his very public exit from the campaign.

Q Was Mr. Parscale --

A He was publicly humiliated.

Q Right. In other words, he was fired from the campaign?

A Yes.

Q All right. And then Mr. Parscale continues on: It has been decay. This week I feel guilty for helping him win.

It was a reference to 2016, I imagine?

A Yes.

Q Okay. And you respond: I lost faith since he signed the first omnibus.

And what was that a reference to?

A Yes. So the first omnibus bill, I was really upset because I'm anti-omnibus. And that was just my way of trying to console him.

Q The first omnibus would have been from when, in 2017?

A It would be 2017, yes.

Q And so you were saying you had lost faith 4 years prior?

A Yeah.

Q Okay.

A It wasn't a serious statement. It was just, it's okay. I lost faith during the first omnibus.

Q And then you said --

A This was draining the swamp, and it wasn't draining the swamp. So --

Q And then you continue, like you've said earlier: People are responsible for their own actions.

And Mr. Parscale says: Well, if I don't help, none of this happens.

And, you know, I could just read it through.

And you respond: To be honest, if we had Hillary in, this would have starred -- I think you're saying started -- back on the summer and been a lot worse.

A Yes.

Q And so you think that the feelings people would have had would have

erupted earlier?

A Yeah, I do, when you look at the nature of how things went. And we saw what happened with the summer of love. And then, my God, could you imagine COVID? We'd probably still be locked down.

Q Then you continue: Not true. You're a God.

And you clarify you meant: You're not a God.

And Mr. Parscale says: Well, hard to remove my guilt.

And he says: I know.

Then you continue: You did what you felt right at the time and, therefore, it was right.

But Mr. Parscale acknowledges: Yeah. But a woman is dead.

And you say: I regret my ex-husband.

And then: You do realize this was going to happen.

So this is echoing the comments you made to Mr. Miller, it sounds like, the notion that you had a sense that violence was coming.

A Yes.

Q And Mr. Parscale says: Yeah. If I was Trump and knew my rhetoric killed someone. Yeah. I know. Hence, my life lately.

Do you understand what he was, from your perspective, when he seems to be regretting his life lately --

A Yes.

Q -- what did you take that to mean?

A I mean, again, from the time that he got fired to his very public incident, you know, he was in a really bad place at that time.

Q And you come back and say: It wasn't the rhetoric.

And Mr. Parscale says: Katrina, yes, it was.

A Yes.

Q And then you respond: I've been telling you for years that this was building in the people.

And Mr. Parscale responds: I know. He is pushing this.

Did you agree that -- or not agree with his claim that Mr. Trump was pushing this in the people?

A I don't think that he was pushing it in the people. I mean, these were just sentiments that have been out there for a very long time, you know. And that's why I stay involved, like I mentioned earlier. You know, we doing what we do give people hope because we continue the conversation. We give them avenues to express their voices. We make them -- their voices heard, and they feel validated. And, you know, you channel that energy into elections, which is the way it's supposed to go.

Q And but on this day on the 6th, what was the hope on the day of and on the ground? What was the hope that was there? I mean, another election wouldn't be for two more years for Congress and four more years for the Presidency.

A Well, this is in the broader context, because he's feeling bad about the whole, you know, 2015 forward -- or 2016 forward. And what I'm saying is, you know, we did what we could. We did what we felt was right. You know, we got somebody in that was supposed to go drain the swamp. I'm just trying to console him really.

Q Yeah.

A We gave him hope, you know.

[redacted] Well, that's all I have that I can think of. I just need to collect my thoughts, but I'll ask in a moment if anybody else who's on the phone has any questions for Ms. Pierson before we recess.

[redacted] Yes, [redacted] I just have one question.

Ms. Pierson, you -- and this is sort of take you back to the January 4th meeting at the White House. You mentioned that you thought maybe Bobby Peede was there. Do you remember Mr. Peede participating in that conversation at all?

Ms. Pierson. He may have. I just don't remember specifically.

[redacted] Okay. Thank you. That was the only question I had.

Ms. Pierson. Sure.

[redacted] Okay. I don't see anybody else going off mute, Ms. Pierson. Six minutes over par 2:30, but that was about my estimate.

Thank you for being here and sticking with it. I'll ask at the end if you have anything further you wanted to say before we complete the interview?

Ms. Pierson. I don't have anything else to add, but I'll make myself available if you guys need something.

[redacted] We appreciate that. You've been more than kind and giving with your time. So thank you for being here, but we'll stop it for today.

And, Dave, thank you, and Mike as well.

Mr. Warrington. Yeah. [redacted] just to put on the record, our position is that this complies with her obligations under the subpoena.

[redacted] I will follow up in writing. I can't confirm, because it's not my role, but I believe that will be the answer I give you too, Dave. But just let me take that up, and I'll get back to you.

Mr. Warrington. Fair enough. Thank you, [redacted].

[redacted] All right. Take care.

Thank you, Ms. Pierson.

Ms. Pierson. Thank you.

[redacted] We are off the record at 2:37 p.m. that completes the interview.

[Whereupon, at 2:37 p.m., the interview was adjourned.]

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