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

DEPOSITION OF: MICHAEL LAMONT SIMMONS

Thursday, February 10, 2022

Washington, D.C.

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

Present: Representatives Lofgren and Raskin.

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Appearances:

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

[redacted] STAFF ASSOCIATE
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For THE WITNESS:

DAVID OLIVAS
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[redacted] Good morning. This is a deposition of Mr. Michael Simmons 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, I'd ask the witness to please state your full name and spell your last name for the record.

The Witness. So Michael Lamont Simmons or Greene. S-i-m-m-o-n-s.

[redacted] Thank you. This will be a staff-led deposition, and members of course may choose to also ask questions. In the room today we have [redacted] investigative counsel; [redacted] investigative counsel; [redacted] investigative counsel; [redacted] investigative counsel, and [redacted] professional staff member, and [redacted] professional staff member. There are no members present currently, but I will let you know, Mr. Simmons, that at times some of the Congressional Members do pop in for depositions, but currently there aren't any members on the call right now, for your awareness.

The Witness. Okay.

[redacted] Before we begin, I would like to describe just a few ground rules for you. We will follow the House deposition rules that we had previously provided.

Oh, before I get into that, what is your legal name? I just want to make sure that it is clear for the record. I know I asked you off the record. But what is your legal name?

The Witness. It's actually both. I got two last names. I have two birth certificates, two -- you know, but it's the same license number, and it's the same Social Security number. Like, I had young parents. And I don't know what was going on.

[redacted] I hear you. That's good. Thank you for clarifying that on the

record for me. I appreciate it.

So, before we begin, I'd like to describe a few ground rules for you. We will follow the House deposition rules that we sent at the end of your subpoena, via email, to you --

The Witness. Uh-huh

[redacted] -- under House deposition rules, counsel for other persons or government agencies may not attend. And you are permitted to have an attorney present.

I would like to note for the record what has been previously marked as exhibit 1 is a subpoena for Mr. Michael Simmons, which is dated January 10th of 2022. You are here for this deposition pursuant to the subpoena. So, at this time, would counsel for Mr. Simmons please state their name for the record?

Mr. Olivas. There we go. My name is David Olivas, Texas Bar No. 24088155.

[redacted] Thank you, Mr. Olivas.

There is an official reporter transcribing the record for this deposition. Mr. Simmons, just please wait until each question is completed before you start to begin your response so we can capture it properly on the record. And we will try to wait until your response is done before we ask any followup questions.

The stenographer cannot record nonverbal responses, such as shaking your head. So it's important that you answer each question with an audible, verbal response. And I if see you shaking your head, I'll note it for the record that's a positive response or a negative response from the witness. So I will try to help you out if you are shaking your head, but verbal responses are preferred.

We ask that you provide complete answers based on your best recollection. If the question is not clear, just ask me for a clarification or whoever is asking the question.

And, if you do not know the answer, please simply say so. You may only we refuse to answer a question to preserve a privilege recognized by the select committee. And if you refuse to answer a question based on privilege, staff may either proceed with the deposition or seek a ruling from the chairman on the objection. If the chairman overrules such an objection, you're required to answer the question.

I also want to remind you that it is unlawful to deliberately provide false information to Congress. So, for this interview, providing false information could result in criminal penalties for perjury and or false statements. So do you understand that, Mr. Simmons?

The Witness. Yes.

[redacted] Would you please stand and raise your right hand to be sworn in?

The Reporter. Do you solemnly declare and affirm under the penalty of perjury that the testimony you are about to give will be the truth, the whole truth, and nothing but the truth so help you?

The Witness. Yes.

[redacted] So, logistically speaking, let us know if you need any breaks or would like to discuss anything with your attorney. We can go off camera, mute everything, and you can talk to him if you all need to have any discussions out of our presence. If you need a break, like a comfort break to grab a water or do whatever you've got to do, just let me know. I will try to be cognizant of timing. So, if we go for an hour to 90 minutes, might just throw in a 5-minute break so we can go do what we have to do and then come back on the record. Does that all make sense?

The Witness. Yeah.

[redacted] And there may be several people asking questions today. I will call them out by name before they ask you a question. But I just want to let you know

there may be other folks who pop in and ask you follow up. And, if you don't understand the question, again, just ask them to repeat it.

The Witness. Okay.

EXAMINATION

BY [redacted]

Q I'll start off, how old are you? Where are you from? What's your educational background?

A From Indianapolis, Indiana. I'm 38 this year. Educational background, I graduated from high school. Went to college for 2 years. And then I took some courses, like some security course work. And I went to a -- a -- explosive school down in Tennessee. I mean, other than that, like, I just -- I try to -- I try to take light courses to further my career field.

Q And, when you say "security," is it like actual classic personal security type stuff or like cybersecurity? What type of security are you taking classes for?

A Well, I do executive protection, but I was going to college for cybersecurity stuff for 2 years, and then I went back into security work.

Q Where did you go to college?

A I went to Ivy Tech. It's a community college here.

Q And you still live in Indianapolis right now?

A Yes.

Q Is that correct?

A Yes.

Q You said "executive protection." What is your current occupation? Executive Protection?

A Yeah. I do security, executive protection, close protection. I do site

surveys, site recons, threat assessments. Threat mitigation plans, static security, just, you know, all types of security. I even install surveillance systems and monitor them.

Q Do you do this as an independent contractor or do you work for a company?

A I do it for an independent contractor, but I work for a couple of companies as well. Like -- I mean, it's the contracting field. So, like, you might be on the books for several companies at once. I mean, it's -- you know, how you keep working, like I worked for Phillips, Excalibur. Triple Canopy is -- you know, I'm an employee of Triple Canopy, and then like I'm a contractor for Phillips, a contractor for Excalibur, and contractor for Amor Group. Stuff like that.

Q And that's what requires you to travel to different jobs that you might be signed up for or requires you to travel off site --

A Correct, correct. Like, they might call you Monday for a job Friday, and it's in Washington or something like that, or: Hey, man, can you go to Virginia?

Or: Hey, we have something going on in Ohio, you know; what's your availability? You know, can you fly out to Vegas for 2 months? Or stuff like that. So, I mean, you can either do it or you can't. If you can pass their prereqs and qualifications or, you know, whatever the client is asking for, they will reach out to you.

Q At any point, were you law enforcement?

A I was law enforcement. I was a police officer for a year for one of the police departments here.

Q Okay. Which police department was it?

A It was the airport police department.

Q Got it. And you say you did that for a year?

A Yeah.

Q Got it. And I know, I understand that you were in the military. How long

were you in the Army? What was your career field? Can you tell us a little bit about that?

A I was in the Army for about 3 years and 6 months, I think it was. I got it involuntarily extended for a deployment to Iraq. And I was a combat engineer, small arms assault guy. Like, I know, you know, engineering is generally like building stuff, but that's not the kind of engineering we was. We blew a bunch of stuff up. We looked for IEDs overseas, diffused mines, and stuff like that. And so, when I went to explosive school, it was just padding on what I've already done in the military. And so it just kind of fit.

Q Thank you for your service. As a fellow veteran, I definitely understand a combat engineer is not a traditional engineer. And I definitely understand the involuntary extension when you're trying to get out. So -- and did you do military before law enforcement, or what was the order of that?

A I went to the military right out of high school. I didn't know what I wanted to do when I graduated so I went to the military. And, you know, I had a couple offers to go to college. And I just -- I didn't know what I wanted to do, so I went to the military. Like, I knew I could serve in the military and be proud of my service. So I went into the military, and I liked it. I only got out to work for private companies.

Q Got it. Got it. Okay.

[redacted] can we just pull up exhibit 5 real quick.

I'm just going to pull up your DD214 and ask you to confirm that this is actually your DD214. It will be page 2. Do you recognize this as your DD214, Mr. Simmons?

A Yes.

Q Okay. We can just scroll, just scroll through it to make sure.

So you got out at Fort Stewart? That was your last assignment?

A Uh-huh.

The Reporter. Yes or no, please.

The Witness. Yes. I'm sorry.

[redacted] Sorry about that, [redacted]. I should have caught that.

Thank you, [redacted] You can take that down.

BY [redacted]

Q All right. Before we get into the questions about what happened on January 6th, we understand, through some of the filings that have been filed with some of the defendants in the Oath Keepers matter with the DOJ that you interviewed with the FBI. Is that correct?

A I did, yes.

Q How many times --

A I had a phone interview twice and they sent a guy out to see me when I was Vegas. And then, when I got home from Vegas, he came back, and we had a brief conversation. And he had warrant for my telephone.

Q Okay. So they actually seized your telephone?

A They did.

Q When was that? Do you remember when?

A That was in September.

Q Okay. So recent, not too far ago. It was -- and you had your interviews in May I believe. Is that correct, around May?

A Yes. It was in May.

Q Okay.

A And they asked for my phone then. And I let them see it. Like we sat there and talked for a couple hours, and I let him see my phone.

Q So it was a total of what four times that you spoke to the FBI?

A Yes.

Q And two were in May, and then it sounds like the other two were in September?

A I talked to them twice on the phone.

Q Okay?

A And then they sent the guy to see me. And we had a conversation when he came to see me in Indianapolis to get my phone. So I don't really consider that last visit from the FBI like an official conversation. We just talked about, you know, the events that was going on. Like, he showed me the warrant, you know. He explained why they needed the phone and stuff like that. So it wasn't like an interview about what happened.

Q When was the in-person discussion then?

A That was in May.

Q Okay. Did -- were you ever identified as a subject, target, witness? Did they ever tell you what you were identified as?

A Well, they just told me I was a person of interest initially. And then they sent the guy to talk to me. And I really didn't understand why they sent somebody to talk to me after I talked to the guys on the phone. So I talked to two agents on the phone from Indianapolis, and then the guy who came to see me was a guy from the D.C. Office. And he asked --

Q Did you ever --

A -- a bunch of the same questions. And he asked a couple of questions that they didn't and, you know, showed me pictures and stuff like that.

Q Well, I don't -- I'm sure you appreciate this point, but this is a totally

separate investigation from the DOJ, so I may be going through a lot of those same questions that you previously asked -- or answered with the FBI. So I just want to highlight that for you.

Did you ever, without getting into what you said, did you ever testify before the grand jury as well?

A No. I never went before a grand jury.

Q Have you worked out any deals like immunity or anything with the Department of Justice for the ongoing investigation?

A I have not.

Q Okay. Are you currently, like, cooperating with the DOJ when they have questions for you for the Oath Keeper conspiracy cases?

A Yes. I -- you know, I don't -- like, I don't, like, see an issue with talking to them, you know. They -- they -- they haven't, you know, -- in my opinion they haven't wronged me in any kind of way or made me feel like I was a subject of an investigation. I mean, they -- they just generally come and talk to me about stuff. They asked me questions. And they showed me, you know, like I said, like, when he came out, he showed me pictures and stuff. And we just talked.

Q Did you -- have you met with the defendants' attorneys as well, some of the Oath Keeper defendants, have you met with them?

A I have not met with any of their attorneys. I've talked to -- I talked to Josh James' attorney, but it was -- it was -- it was before the FBI took my phone. And I don't remember the date. And then, when Stewart got arrested, I talked to his attorneys.

Q Gotcha. So that was -- you talked to his attorneys recently?

A Yeah. It was more recently.

Q And Joshua James' attorneys, was that like summertime of 2021?

A Yeah. It was -- man, I -- it -- probably July, August timeframe. It was a while ago.

Q Okay. And what was the nature of what you all were discussing?

A He just wanted to know kind of, you know, what happened and, you know, because -- because he said that he was looking at a conversation that I had with the FBI. You know, a lot of the defendants were naming me as somebody. So he just wanted to call and touch bases with me. He told me who he was and stuff. And we talked briefly about what happened. And then he was telling me about Joshua James' situation and stuff, and that he wasn't able to contact anybody because of some agreement he had with his -- with his bail or his bond other something like that. But I haven't heard from him since.

Q Got it. And what was the nature of the conversation with Mr. Rhodes' attorneys?

A They just wanted to know, again, what happened and stuff like that. Like, everybody is really asking same questions.

Q Well, I apologize in advance.

[redacted] Does any other of the staff members have any questions for Mr. Simmons on that topic?

BY [redacted]

Q So let's go, I guess, go back to the beginning of your relationship with the Oath Keepers. Tell us, how did you even get connected with them in the first place?

A So, when I first seen the Oath Keepers -- my first time seeing the Oath Keepers, it was at a gun show. I seen some guy -- and I thought they were a racist group when I -- when I first seen them. Because the people who was representing them was, you know, the racist type. You know what I mean? And they had a booth at the gun

show. And the only people around their booth was, like, these, you know, these militia types. And, you know, a couple of them had been making comments about, you know, Black people and Hispanics and stuff like that. So I thought they were a racist group when I first seen them.

And so, you know, a couple of months go by and I meet some guy, military guy, and he was an Oath Keeper. And then a friend of mine ended up being an Oath Keeper, and he's a Black guy. And I was like: Damn, man, I thought they were a racist group.

He was like: No, man, you know, it's legit. It's square.

So me and these two guys, you know, we train, we get on the range and, you know, we talk. And we work on tactics together and stuff like that. And, you know, they were Oath Keepers. They were pretty solid. You know, Greg is a huge Black guy. You can't miss him. And you know, he swore by them. And so, you know, I just started to, you know, look at it like, okay, well, maybe, maybe not.

A couple of years go by, and I get a call from Greg, and he's asking me if I'm home and available for work? And you know, the Oath Keepers had some disaster relief stuff going on where, you know, they can use -- they can use me for protection of, like, Mobile Medics and Doctors Without Borders and stuff like that down at the Harvey Hurricane in Texas. And so he told me he was there with Stewart Rhodes, the founder of the Oath Keepers, and stuff like that, and if I wanted to come and work, he'd cover all of my expenses, and he would pay me if I came out there. So I went out there.

And I met with Stewart, I met with Greg. And they had a couple of guys out there. It was -- it was -- you know, me and Greg -- we -- me and Greg were the only darkies out there, but we had a couple -- a couple of Hispanics, and a bunch of other White guys. But it was -- it was no funny -- you know, everything was on the up and up. You know, they helped with the disaster relief. They rode around with Doctors Without

Borders. They helped the sheriff's department do police work, down in Marysville. They, you know, set up booths with the National Guard. Stewart took in several pallets of donations of food and gave it to the National Guard to hand out to people who didn't have food and stuff like that. So they were a pretty solid group. You know, what I mean? And so, you know, I could get behind what they were doing.

Q Did you notice a difference -- so you described the first interactions with the militia types. First of all, what did you mean by -- I think I know what you meant, but what did you mean by "the militia types"?

A Like, just -- the run-of-the-mill typical, stereotypical White guys, military BDU uniforms. You know what I mean? And, you know, you got some of those guys, like, they got the White nationalist tags on like the Nazi signs and stuff like that. And so, like, when you see that kind of stuff, you're like well, you know: What the hell? And, like, they are all around the Oath Keeper booth. And I'm like: Hell, well, hell, if they're okay with them being around, you know, I -- that's kind of how I associated them.

Q So what was -- did you notice a difference, though, between the Oath Keepers you were around during the Harvey relief than the ones you saw at the booth that day? I'm guess I'm just trying -- I'm just trying to square, right, how comfortable --

A -- well, the so here's the thing. I don't think that, like, the Oath Keepers at the booth and the militia guys weren't, like, together. They were just around the booth. And I'm just saying, like, when I seen that, I felt like they were all, you know, net the same.

Q Yeah.

A When I actually started getting around Oath Keepers guys, you know, it was nothing like I thought it was.

Q Okay. And how was, I guess, Mr. Rhodes when you first met -- the first

time you met him was with the Hurricane Harvey relief? Is that the first time you met him?

A Yes.

Q Okay. What -- can you described to us what he -- you described some of his actions of like getting some of the food for the National Guard to hand out and stuff like that. But what was Mr. Rhodes like when you met with first met with him?

A I mean, it's -- he's, you know, he's a pretty -- pretty solid guy. He was squared away, you know, mild-mannered guy. You know, he wanted to help people. You know, he was making sure everything was all right. I mean, because we were -- we were staying at a -- at a warehouse. And, before that, we were staying the a karate dojo. And he was just making sure everybody was, you know, everybody was okay, everything was fine. You know, he would go and talk to people and stuff like that. And so, you know, like, he -- you know, he was there, he was getting his hands dirty with everybody else. It was, you know, he was just a, you know, a regular guy who just wanted to help.

Q I guess -- did you ever join the Oath Keepers after this? I guess --

A No. No. I never joined the Oath Keepers.

Q Why did you never join the Oath Keepers?

A I just -- I just didn't. You know, it's not my -- it's not my -- it's not my thing, man. I don't -- don't really -- you know, I'm not a group guy. You know what I mean?

Q Okay. Your friend Greg, is he an Indianapolis -- an Indiana Oath Keepers?

A He was an Indiana Oath Keeper. Greg moved to Montana. And he started a firearms company, training and -- and selling firearms. And, like, I'm actually one of his instructors. And so, like, that's like Greg -- Greg moved to Montana to start his business.

Q I think --

A But he was a -- he was a sheriff in Indiana. And he was an Oath Keeper in Indiana.

Q So was he prior military as well?

A Greg wasn't in the military. Greg was a sheriff deputy.

Q I think one of the things that we've been trying to understand as well is the events on January 6th is understand some of the organizations that are involved or around January 6th, such as the Oath Keepers. And so, what is Greg's last name? We might want to, you know, ask him a few questions about what his experience in the Oath Keepers has been?

A It is Greg McWhirter.

Q McWhirter. Okay. Can you spell that? Do you know how to spell that for us?

A I can't spell it correctly. I -- I'd spell it the way it sounds.

Q Okay. And he is in Montana now?

A Yeah. He's in Montana.

Q Okay. Let's see. So I guess just to square this topic, from your initial impression to the Hurricane Harvey experience, describe what the Oath Keepers are to us from your perspective now. Like, how would you describe the organization?

A The organization now?

Q Yeah. How would you describe the Oath Keepers?

A I mean, they are -- they are -- they are an organization that wants to do -- like they do disaster relief. They help with security for events. And I mean, in my opinion, they've -- they've been pretty bipartisan.

Now, with some of the events that was going on leading up to the January 6th

stuff, you know -- you know, some of the members you were meeting were, you know, more: Hey, you know -- they are Trump supporters basically, like some of the members were. And some of the members were still bipartisan. But, by in large, you know, the Oath Keepers that I've met, most of them's been bipartisan.

Q Did Mr. Rhodes, would you have describe him though as bipartisan in leading up to January 6th or as one of the ones that you would describe as a Trump supporter?

A So the funny thing is, like, Stewart talked about Trump as being an F'ing idiot. You know what I mean? You know, doesn't know how to speak and stuff like that. So like he wasn't a true, like, what you would call a Trump supporter. He talked bad about him. And he talked bad about Biden too, you know. You know, it's kind of hard to say, you know, he's bipartisan or he's not bipartisan because, like, when you look at him and say, well, he supports Trump. No. You're like he bashes Trump every time he gets the opportunity.

Q I guess the question then would be outward facing. Right? What we see from Mr. Rhodes was never any bashing of former President Trump. So was it different when he was talking to you in private and what he was putting out to the public.

A Well, see that's the thing because there's conversations that he had with media people where he would say: Hey, man, Trump is an F'ing idiot, and he needs to do this, and do that. I'm going to send him a letter. And I think he wrote him a letter and sent it to him. And you know, obviously got no response. But I don't know what the contents of the letter was, but you know, he -- he didn't really -- like, he wasn't a die-hard Trump supporter. So you know, it is kind of hard to say the group wasn't bipartisan.

Now, I will say that, like, with some of the rallies and stuff that he was helping to do security with, like, a lot of the guys -- like, the rally was for Trump. You know what I

mean? So it doesn't look like you're a bipartisan group when, you know, you'd go in and you -- you do security for said rallies. But, you know, he's done Black Lives Matter rallies as well.

Q Yeah. I think that I'll ask that in a little bit. I think -- was the letter you're referring to the one where Mr. Rhodes was encouraging former President Trump to invoke the Insurrection Act? Is that the one where he was disagreeing with President Trump?

A I think it was.

Q Okay?

A I'm not 100 percent sure, but he -- he talked about Trump needing to invoke the Insurrection Act, or, you know, Trump needs to start doing something about antifa running -- running wild in the streets.

Q And I think -- I haven't been tracking examples of where the Oath Keepers provided security at Black Lives Matter protests. Did you -- are you aware of any of these? Did you help out on any of these situations?

A Well, I did not. So the protests in Louisville was, you know, they were helping businesses down there. But he had a situation where a member from Black Lives Matter was speaking out against, you know, some other Black Lives Matter groups. And they went down to protect her. And they, you know, put people around her house. And it was another rally where it was some -- it was some Black church. And they had some -- some pro-Black protests at the church. And, you know, the church started getting messed with by White nationalists. He sent some people down there.

Q Are these things that he told you, or did you actually know, like, they actually happened?

A Well, actually, these are things that Greg and I talked about.

Q Okay. Got it. Okay. That's helpful.

Moving through, I guess different folks with the Oath Keepers, Ms. Kellye SoRelle or SoRelle. Do you know her?

A Yes, I do.

Q I guess, what -- how did you meet her? What was your relationship with her, and I guess what is your current relationship with her?

A Currently I don't really -- I can't really say we really have a relationship. I mean, like, I called and talked to her a couple of weeks ago, you know, to check on how things are going. I think they told me that Stewart named her as the spokesperson for the Oath Keepers while he was absent. But I started off, like, in -- back in November she was working for the Trump administration, like, at one of the polling locations in Michigan.

Q Yep.

A And I think she might have witnessed something and she was getting threats. So Stewart called and had me go and sit with her and be her protection. And so that's how I met Kellye.

Q How long did -- and how long did you provide protection for her in Detroit?

A About 2 weeks maybe, a week and a half, something like that.

Q Did you -- I guess walk us through that process. You're clearly a professional executive security person. You talked about doing threat assessments and going through and doing advance work. How you did you prepare to provide protection for Ms. SoRelle for this situation?

A So Stewart called me, and he told me what was going on. And I told him the soonest I could get there was, like, the day after he called me. And so, when I got there, you know, I drove around, like, you know, because she told me where she would

be at, and she was -- and she was pretty frightened. So, you know, I drove around where she was at and the hotel she was staying at. And then, you know, I went and I -- I initially met her and took her back to her hotel. And he sent another guy out there, who was -- you know, he was -- I think his name is Jeffrey.

Q Is it Morlock?

A Yeah, yeah. So Jeffrey was out there as well. And so I went around the hotel, checked the hotel. And, you know, she was pretty -- pretty frightened about what was going on, and what she had seen, and what people had said about her, and you know, how people was approaching her and stuff like that.

So, like, initially, I didn't really see a threat. But then like when people started showing up at the hotel, you had some characters, you know. So I was like, okay, well, maybe -- maybe there's something here. And so the next day she wanted to go out and talk to some other attorneys at some office and then some State representatives and stuff like that. And so we just were moving around Michigan -- well, Detroit. And she went to a rally down there.

After that, you know, it was kind of -- everything started to kind of calm down in Michigan. And so, she was going to go out to meet with Stewart and Ranger Rick -- Greg -- I mean, not Ranger Rick. Damn. The -- the -- the guy from North Carolina. I can't think of his name right now.

Q Was it Doug Smith?

A Yeah, Doug. Yeah, Doug, Ranger Rick, Doug. So she was going tout to meet with Stewart and Doug. And so, when they were getting ready to leave to go to Carolina, I went back home.

Q So did -- Ranger Doug came to Detroit for that?

A No, no, no. She left. Her and Jeff went down to Carolina to meet with

Stewart and Doug.

Q Gotcha.

[redacted] Mr. Olivas, I'm sorry. I know you came on. Do you have anything you wanted to say? I saw you're on camera. I didn't know if you had something you wanted to say.

Mr. Olivas. No, I was switching devices.

[redacted] Oh. No worries. Thank you.

BY [redacted]

Q Do you know what Mr. SoRelle and Mr. Rhodes went down to North Carolina to meet with Ranger Doug about?

A I do not.

Q Okay. Do you know -- have you ever met Ranger Doug or know him?

A Yeah, yeah. I met -- I met Doug out in Louisville.

Q What is he like?

A He's a character. You know, he's a veteran. He was a Ranger. He got out. You know, went back in. Got deployed again. He was like the oldest guy in his unit, and they went on a combat deployment. Like, Doug is kind of shit like it's funny, but it's not funny. One of those kind of guys. Like, he's kind of shell shocked. You know what I mean? He's -- he's funny. Like the guy needs a -- the guy needs a reality show. You know what I mean? But, you know, he's -- he goes zero to 10 quick, you know. But he's a cool guy. You know what I mean? But he's just kind of -- he's just kind of jacked.

Q Did you consider him like leadership with the Oath Keepers with Mr. Rhodes? Or how would you describe his influence with the organization?

A He was the head of North Carolina chapter.

Q All right. And we'll get into this more when we get to the January 6th planning. But I'll definitely want to -- I've seen North Carolina Oath Keepers mentioned in various Signal chats and text messages. But it would be great if you can help us understand their involvement, if they had any, in January 6th.

A Okay.

Q I guess Mr. Morlock, going back to him, what was he like while he was providing protection in Detroit with you for Ms. SoRelle?

A Jeff was pretty -- pretty -- pretty mild-mannered. He went to a protection school. And, you know, he does protection down in Florida. He's licensed in Florida. And I mean, he -- he was -- he was pretty cool. Like, you know, just -- he wasn't like -- he wasn't like the -- you know, the security guys that generally show up like -- like some of the guys that showed up to help with the Breonna Taylor stuff. You know what I mean? Jeff was, like, quiet. He was, you know, more reserved.

Q Got it. And, overall, you kind of talked about this, but the Detroit experience, did you all have to act at all? Did you actually witness any actual threats that you had to deter? I guess, how did that 2 weeks, how did that play out with Ms. SoRelle?

A Well, it was -- it was -- more or less -- because -- she's the kind of person, like, okay, we're providing protection. Like she would walk off and maybe just about dart into traffic. You know what I mean? Like she'd walk off on her phone or she'd take a phone call and stuff like that. And she would just like dart. And she was concerned about the people that were at the hotel. And she would -- and she would do stuff like, she damn near walked through a crowd of people, you know, not evening paying attention. And so, you know, she was kind being a security risk by doing stuff like that.

But, you know, everything else like the biggest threat where the fact that some of the people at the hotel with her made threats, and she didn't want to leave the hotel.

Q What kind of threats did they make to her? Do you know?

A Well, they were saying stuff -- but know now, because she started speaking out about how she seen, you know, voter fraud and stuff like that. And she said the DNC, like, the Democratic people were making threats to her and -- you know what I mean? And so, like, I didn't hear any of the threats. Just, you know, what she was telling us. But she was pretty spooked about it. So, you know, I just took her word.

Q Got it. And did Ms. SoRelle pay you for this job for 2 weeks, outside of the hotels and food and stuff?

A Stewart paid for the initial protection for Kellye.

Q Gotcha. How much, if you don't mind, how much were you paid for those 2 weeks approximately?

A I charged him $200 a day.

Q Okay. Is that pretty standard for executive protective standards, or is that a discounted rate? How would you describe it?

A It just depends on who you're going through. Some companies charge more. Hell, some companies charge less. So I think it's pretty -- pretty -- pretty middle of the road.

Q Okay. And that was $200 a day on top of meals and lodging expenses?

A Correct.

Q Okay. Do you have any knowledge about the relationships between -- if there are any, between like Oath Keepers and public figures like Mr. Roger Stone?

A No. So, to my knowledge, there was no prior relationship. And then the -- I think the Florida crew end up to -- I talked to the guy from Florida. He end up

saying that they've done protection for Roger Stone before. But, you know, to my knowledge, the Oath Keepers as a whole, I don't think they had a prior relationship with Roger Stone.

Q So the Roger Stone -- Mr. Stone's relationship with the Oath Keepers was started with the actual Florida chapter, to your knowledge?

A To my knowledge, yes.

Q And what about Mr. Alex Jones? Did you know if the Oath Keepers had a relationship with him?

A I don't know about Alex Jones. I know Stewart mentioned that he talked to Alex Jones a couple of times and that he knew him, but nothing like: Hey, you know, we provide security for Alex Jones. He just -- you know, he was just a guy -- you know, he was just a guy.

Q Yes. And when was this? Do you remember approximately when Mr. Rhodes said he had talked to Alex Jones? Was this leading up to January 6th or other times?

A This was -- I think we had a conversation -- it was -- it was something that was going on. And Alex -- you know, how -- some stuff that was on Alex Jones' show. And Stewart was like: Oh this guy. And then he said he knew him and spoke to him. It had nothing to do with any of the events.

Q Got it. What was Mr. Rhodes', I guess, feelings or impressions of Mr. Alex Jones, if you recall?

A He just -- at that point he was just, like, yeah, he's somebody he knew. He didn't really show any emotion towards him one way or another.

Q Were there any other media figures that you can recall that Oath Keepers might have had a particular relationship with?

A No.

Q What about politicians?

A No, no. Like I said, like, outside of the disaster relief and doing security at the Breonna Taylor stuff, I didn't think the Oath Keepers did any political figures or, you know, you know, big name people like Alex Jones. You know, I just thought they were disaster relief, and, you know, they help do security for businesses and organizations -- other organizations.

Q I want to go through some of the chapters -- you've mentioned some of these chapters already, but I want to go through them just to make sure. So the Florida Oath Keepers, did -- you worked with them I'm assuming leading up to January 6th?

A I worked with them out in Louisville.

Q Louisville. How would you describe that chapter, like, how were they?

A Kelly was school cool. He had a couple people waiting, you know.

Q Kelly Meggs?

A Kelly Meggs, yeah. And I only -- I only actually talked to a couple of the guys from Florida. And, you know, there is an another guy named Todd; he's from Florida. He's, like, a firefighter. And, you know, he -- he was pretty cool. And Kelly was pretty cool. Everything was -- everything in Louisville was on the up and up. So, like, you know, I didn't -- you know, any of the other people I talked to, it wasn't a bad impression for me. Like, they wasn't like -- they wasn't radical seeming. You know what I mean?

Q Do you remember Todd's last name?

A Who?

Q Todd.

A Todd? I don't -- I don't remember Todd's last name. And, you know, like,

I don't have the other phones, so I couldn't -- I couldn't do through and get it for you.

Q Yeah.

A You know, he was -- Todd -- there was another guy there from -- from Florida. I don't remember his name either, but, you know, they were -- they were cool. This guy rode with Todd. And, you know, they were -- they were cool. And then Kelly came, and, you know, there was a couple of people they had with them. You know, they were just -- they were -- they were straight up and down, pretty solid when I met them.

Q Does Kandaris or Kandaris ring a bell for Todd's last name?

A I don't know. No. It doesn't sound like it.

Q I'm just going -- I just got to throw it out there. What about the Ohio Oath Keepers? Did you ever work with them?

A The Ohio Oath Keepers. Well, the only -- the only person that I met that was an Oath Keepers from Ohio was Jessica.

Q Okay.

A And she had --

Q Watkins?

A Yeah. Jessica Watkins. She had a couple guys with her. And I think one guy was her boyfriend and then she had another guy who was, like, one of her militia members. And there was another guy who was one of her militia members. But like as far as Ohio Oath Keepers, she's the only Oath Keeper that I was from Ohio. She just had people with her.

Q So you used the term "militia" when you described Ohio. Were they different I guess than some of the other chapters in your mind?

A Well, no. That's just -- what -- what she's, you know -- that's what she said,

you know. They had a militia there. And you know what I mean. That's what she called it. So that's what I called it. But it was only like a couple guys, like her boyfriend and two other guys.

Q How would you describe them? What was the Ohio Oath Keepers like? What was there personality?

A Honestly, Jessica was semi squared aware. The other guy, he didn't -- I mean, he shouldn't have been there. Like he -- like had no knowledge, no tactical anything. He was just a guy. And then the other two guys, I didn't really talk to the other two guys, but, I mean, they were all -- they were all quiet. And, you know, it was -- it was -- it -- one guy, he looked like he was scared. And so my impression of all those people, you know, they -- they shouldn't have been there. I don't know why she called them a militia.

Q All right. We saw in the indictment for Mr. Caldwell and some of the other Oath Keepers that Ms. Watkins described a military style basic training that the Ohio members would go through. Do you know anything about that?

A She called me -- well, she text me and asked me did I want to attend her training. She had some -- some marine guy who was -- who was teaching their, quote/unquote, basic training for her new members and stuff like that. Oh, you know, it's a 2-day training, and they work on tactics and do stuff with weapons. And, you know, I wasn't -- I wasn't really impressed by the Ohio people in Louisville. But, furthermore, I wasn't getting ready to go to any training that they had going on. But, you know, outside of that, I don't -- I don't know exactly what they were doing, you know, but she asked me about coming out to that training.

Q Do you recall who the marine guy was that was doing the training for them?

A I do not. She never mentioned it.

Q Okay. And do you know, did they do their basic training in Ohio, or did they do it, like, somewhere else?

A I'm pretty -- well, I felt like it was going to be in Ohio. I mean, she didn't say it was going to be anywhere else.

Q Okay.

[redacted] I would just like to note for the record that Ms. Zoe Lofgren has joined.

BY [redacted]

Q Did you ever hear of any other basic training type training programs that Oath Keepers chapters would do for new members?

A I did not.

Q Okay. And just going back to the chapters, what was your familiarity with the Arizona Oath Keeper chapter, if you had any?

A I don't think -- I don't think the Arizona people came out to Louisville. So I don't -- I don't have much knowledge about the Arizona chapter.

Q Okay. Were there any other chapters of Oath Keepers that stood out to you as, you know, good or bad, or that you recall working with?

A It was a couple guys from Carolina, they was, you know -- they were pretty cool.

Q Do you remember who from North Carolina I guess might have stood out --

A I don't -- you know, I don't remember their names. I'm just saying I can remember a couple guys from North Carolina being there. And they were -- didn't make any noise. It was like two of them.

Q So Ranger Doug we have him. Does Steve Kwiatkowski ring a bell?

A No. I know I met Paul, and it was another guy, heavier set, drove a truck.

I don't remember what his name was, but they were all North Carolina guys.

Q Were these North Carolina guys mostly veterans, would you say?

A Yes.

Q Okay. I meant to ask that about the Florida chapter. Were they mostly -- because we know Mr. Morlock, for example, is former law enforcement, and you said executive protection. Were they also, the Florida chapter, mostly veterans or law enforcement or a mix?

A I -- you know, I don't know about the Florida chapter. And I -- I'm not 100 percent sure of Kelly Meggs' background. I think maybe -- maybe he was either first responder or law enforcement -- I mean first responder or military. I'm not 100 percent sure about Kelly Meggs. But like, you know, as far as the rest of the Florida chapter go, I couldn't tell you.

Q Okay.

A I know they had a couple of guys straggling around, you know, maybe -- maybe they all trained together, but you know, they all came together. And I didn't talk to everybody from Florida, just a couple of people.

Now, outside of that, you know -- I mean, they -- they didn't -- they didn't make a whole lot of noise. They didn't mess anything up, you know, like -- so I -- I can't say for sure.

Q Were you ever aware of any munitions training that the Florida chapter would have or put on for their local members?

A Not to my knowledge.

Q Okay. What about I guess a different type of munition, but like gun training in particular, do you recall any of the chapters holding gun trainings for their --

A I don't know about holding gun training, but I do know, you know, some of

those guys go out and train. A lot of -- a lot of -- a lot of the people go out and train. Now as far as, like, just a standardized training, not sure about the Florida chapter. I know Doug says he has training pretty regularly.

Q I think they're both former military so I understand training. What kind of training are these Oath Keepers doing?

A I guess it depends on the chapter you ask. You know? I -- I would say, you know, standard training, you know, rifle stuff, you know -- I would venture to say most of the stuff is militarized rifle training. You know what I mean? Kind of like the easiest stuff to do. But like I never really asked them, like, what the meat and potatoes was about their training because I know when Jessica was describing some of the stuff that some of her basic training stuff: Oh, you know, we just do, you know, we do physical exercises. It's just like boot camp. You know, so, you know, I guess whatever she felt like boot camp was, I mean, because, you know, Jessica was military, and the marine guy was obviously a marine guy, but, you know, I don't know what the Florida guys trained or, you know, if they got together as a collective and trained. But you know Doug mentioned that those guys got together and trained.

Q I guess what I'm trying to understand -- I'm going to use some, I guess, military talk. Is it similar to boot camp in your mind or more like tech school, right? Which?

A I would -- I would venture to say more so along the lines of boot camp than classroom stuff.

Q Gotcha. Okay. And when you say "tactics," like they are doing tactical training, is this, like, tactical training on clearing rooms or how to, you know -- - what is this tactical training like?

A When -- now, when -- when they say we do -- we do, you know, weapons

and tactics, you know. So when I -- when I say it depends on the chapter you ask, you'd -- you know, you'd almost have to ask who's running the chapter's training and what kind of tactics are they doing, you know. Because there is such abroad spectrum when you say "tactics." You know, so --

Q Right.

A Like, you know, when I'm -- when I'm in charge of the detail in -- in Louisville, and these guys are talking about the training they do, I don't -- you know, I didn't really care to ask one way or another, just, you know, just sit and listen to them talk.

Q I guess this is an overall question. Why are these chapters doing weapons and tactical training? What are they preparing for?

A Well, it's -- it's not so much as preparing for anything, but, you know, like you -- you -- it's kind of like you go to the gym. You know what I mean? Like, you'd be like, if you -- if you box, or you used to box, or you do any kind of martial arts you know, you go to the gym to stay sharp. You know, you go -- you go to the gun range to stay sharp. I mean, shooting is a losable skill, you know. So I wouldn't say they are training particularly for any one thing or another. But, you know, one, you might just be going to the range to -- to stay sharp with your -- with your weapons. And, you know, two, if they are going to be in any situation where you're going to carry a weapon or, you know, maybe, at the end of the day, might be forced to use a weapon and defend yourself, you want to make sure that you know what you are doing with the weapon.

Q Right, right. So almost just staying current on your current skill sets?

A Correct.

[redacted] Does any of the other staff members or Ms. Lofgren have any followup questions to that? Okay.

BY [redacted]

Q So you've described Louisville and going out there to provide services with the Oath Keepers. So I want to drill into that a little more. Did you go -- when did you go out approximately to Louisville. When did you go down?

A The first time I went down was in -- in July. It was to talk two a couple of business owners and provide threat assessments for their establishments by way of the Oath Keepers. It was, you know, some riots and stuff going on in Louisville. And a couple of business owners got hit. And some of their stuff got tore up. And they couldn't afford security. And Stewart wanted to provide them at least with a threat assessment and, you know, see if they wanted Oath Keepers to come in and provide security for them if the Breonna Taylor trial went the wrong way and they started rioting again. So he sent me down to do threat assessments for three -- three businesses.

Q So we understood it that you had volunteered to just go down there. Mr. Rhodes actually brought this to you to go down and do the threat assessment?

A Well, actually Greg brought it to me.

Q Got it.

A You know, for Stewart.

Q Got it. And walk us through how you performed these threat assessments in general?

A So the way I do a threat assessment, I do -- like, I'll go out to a business. I'll talk to the manager and the owner. Let them know what I'm there for. You know, so: Hey, if you see me walking around, this is -- this is what I'm doing.

So, of course, they are like: Well, hey, man, we didn't -- you know, we didn't call any security company. We didn't call anybody to do a threat assessment. So I tell, them: Hey, you know, the Oath Keepers is paying for it. So I'll go in the morning, see it before it opens. I'll sit there. I'll watch, watch the traffic, see what's going on. Go

around the building, see how the building looks in the morning. Then I'll go back to maybe -- maybe lunchtime after they are open, see -- you know see the crowd, see what's going on. See -- see how it looks in the afternoon. Do the same thing, go around the building, look at it. Then I'll go back maybe peak hours and look at it, see what's going on. You know, check the environment. You know, sit there and watch it, see what happens. And then I'll go back when it closes and, you know, I'll -- I'll -- I'll look around and see stuff. And, you know, I'll watch how the employees do stuff. You know. What doors are being used, stuff like that. And so, you know, I'll look around, and I'll see if they got cameras. See how you can get in and out of properties. Can somebody bust through the back of your establishment without being picked up by camera or without being seen by regular foot traffic or car traffic and stuff like that. So I jot all of this stuff down, all the risks, and then I'll do an analysis plan and I'll hand it to them.

Q Got it. Approximately how long did it take you, I mean it seems like a pretty thorough process. How long does it take you typically to do a threat assessment for a company or a business?

A This is a full threat assessment; you -- you -- you've got to go open and close, so you go in the daytime, you know, right as they opening or right before they open. And you go in the afternoon. You go back at night. And then you might walk through the actual establishment while they are open. And then, you know, you hand it to them the next day. So you'd probably go out there for anywhere between an hour to 2 hours, three -- three different times or four different times. However you want to do it. So maybe 6 to 8 hours, but -- you know, not like all at once.

Q Got it.

A And then you go in there and you talk to the manager and the owner again. You tell them everything you found. You explain to them, you know, the different risks

and stuff to do to mitigate those risks.

Q How much do the Oath Keepers pay for providing threat assessments in Louisville?

A I think I charge them like maybe -- I think for the whole time I was down there, I think I charged them like just about $600, $700. Something like that.

Q And for each of these payments -- I meant to ask this earlier -- are they paying via check, direct deposit? How were they paying?

A This one was paid through Wintek, which is Greg's company. And it was a digital payment and a 1099.

Q Okay. And so, you did the threat assessment it sounds like in July. And then did you come back to actually help provide security at a separate time?

A Yes. So he had a -- he had a meeting set up with some organization down there, and he was sending some Oath Keepers down there. And he asked me would I go and sit in on a meeting. So I was, like: Okay. I'll go and sit in on a meeting -- you know what I mean -- because it was a meeting about security.

And so, when I went down there, they didn't actually end up having a meeting. But I did meet some of the Kentucky Oath Keepers. And then, since I met them and was talking to the business owners and stuff like that, you know, after that meeting, I went back home, and then he called and asked me would I care to run the security operations since I talked to the owners. And if, you know -- if things got out of hand, he told me that they had got the permission from two of the businesses to provide security at three locations. So, okay. You know, I don't have an issue running a security operation because I've talked to the business owners and stuff like that. So I set up the whole operation, and, you know, everything went okay.

Q And when was this? I guess when did the -- when did the actual security

take place? The risk was in July -- the risk assessment was July --

A Yeah. So, like, the day -- I got there the day before the Attorney General made his announcements about the Breonna Taylor stuff. And so, like, once he made his announcement, we wanted to be able to stand up security teams. And so, like, as soon as he made his announcement, that day, we had people on those properties.

Q Who from the Kentucky Oath Keepers were you working with, if you remember?

A It was Landon. I don't remember what the guy's name is that runs the Kentucky Oath Keepers, but I will say this: There's only like five of them.

Q Okay.

A Yeah. And so -- and out of the five, only -- only three -- only three of those guys were out there. Now, he did like a call to action and had a bunch of people show up.

[redacted] I would like to note that Mr. Raskin has joined the deposition.

BY [redacted]

Q So you said you set up the entire security operation to start when the Kentucky Attorney General would make the announcement about Ms. Breonna Taylor. What was the operation? So describe to us the moving pieces and what your job was and what the different moving pieces were doing while you were providing security?

A So we had a pawn shop, two -- two locations of one, like, one pawn shop company. He has two locations. And then it was a store called I think either Vaden's (ph) or Vada's (ph) or something like that, and they were right across the street from each other. And so, you know, Stewart told me how they did security in -- out in -- out in Missouri.

Q Ferguson?

A Yeah.

Q Okay.

A You know, they were on rooftops and stuff like that because people fire bomb and stuff like that. And so, you know Todd -- what Todd did being a former firefighter, we went and talked to the fire department and got some -- got the lock to open up the street hydrant in case they threw cocktails in the store windows and tried to set them on fire because like that's what -- at the time, you know, like, when antifa showed up and Black Lives Matter showed up, like, they would burn stuff up and loot stores and vandalize stuff. So like, we had 2-by-4s. We had ladders to get on roofs. We talked to the fire department. We got the lock for the fire hydrants. We went and talked to the police department, let them know, you know, what we were going to be doing, where we would be at. So I went and talked to the lieutenant that was in charge that shift. And he, you know, had me talk to the sergeant that was over the police riot team and stuff like that. And so, like, I told him where we were going to be at and stuff.

So we set up guys around the gas station. And then we put guys on the rooftops of the pawn shop. Now, you know, their only thing was to deter people from vandalizing the building or setting it on fire.

Q Right.

A We were not there to fight with anybody. We were not there to try to stop anybody from doing anything. The primary concern was keep the buildings from being vandalized and set on fire. And then, if the business wanted their employees to have, you know, escorts from -- you know, from work to their house, we would provide that as well.

Q Okay.

A We didn't end up doing any escorts. We just did static security on three

buildings.

Q How many guys would you estimate were there helping provide security in Louisville?

A Oh, man. The first night it's probably about close to 40, maybe 40, 50 people the first night. The second night it was less. The third night it was less. You know, we -- we -- after -- after about the third day, we -- we were -- we were only at like a consistent 20, 25, and then, you know, like, groups will come and go. You know, if he did a call to action, people showed up from everywhere. You had, you know, this little patriot group, that prepper group, this militia. You know, just people from everywhere were showing up. People from around Kentucky, had some people come in -- like the Florida guys came in. The North Carolina guys came in. It was a pretty big operation when it first started. But if fizzled down.

[11:01 a.m.]

BY [redacted]

Q So I know you mentioned the Florida and North Carolina guys. And Ohio chapter members were there as well, correct?

A Well, yeah, the Ohio guys -- or the Ohio person came with her people.

Q Okay.

A And then the North Carolina guys -- and, like I said, like, we had rovers, like, people that would drive around and check on the different spots, you know, bring food and water and stuff like that. You know, Doug was one of those rovers. Stewart was in the car with Doug, and they were roving. And then, you know, Todd was a rover.

And so, like, I was pretty mobile. Like, I would go around and check on everything. And then, like, I'd sit stationary at a spot for a couple hours.

And, you know, this started when -- like, this started when the sun started to go down to the times, you know, about 7:00 in the morning, 6:00 in the morning, something like that. We'd pull our guys about 5:30, 6:00, and, you know, wait the next day, wait till the sun went down the next day.

Q Right.

I guess my question -- I remember -- I think I read something where you said that other groups tried to partner with you all in Louisville? Do you --

A Yeah. It was Mountain Rangers or something like that or, you know, some group from around Kentucky. And it was kind of, like -- it was, like, a rumor about them. Like, a couple of the guys had been seen at a White nationalist rally where they were messing with BLM people. And we ended up taking -- like, I ended up taking those -- putting those guys out.

Like, you know, the first day they showed up, you know, they were kind of -- you know, they were kind of all over the place. The one guy who was in charge of them, he had his own security team, and, you know, he had on eyeliner, like a linebacker from Clemson in the '90s. You know, his eyes looked like he was high. You know, he'd dart off, like, "Hey, man, I'm going up here to check on the riot." Like, why are you going to the riot? Like, this is not --

Q Okay.

A -- like, what we're doing. So he would just, you know, walk off. Him and his security team would go up to the riot.

And so Landon told me, he was like, hey, man, these guys are a bunch of racist a-holes, and -- you know, I mean, like, I'm telling you they're going to be a problem. I was like, well, hey, look, you know, if Stewart wants to use them, as soon as they're a problem, they're out of here.

And, you know, I don't know why you would walk into the riot when the security operation was down the street. But, you know, he did that.

And so, you know, one day, they got out the car, I smelled alcohol on them. And I looked at the guy's eyes, and he was obviously high. I was like, hey, man, I don't need you, can't use you. Like, if something happens and you gotta shoot somebody or you gotta go physical with somebody, nothing you say is gonna matter because you're intoxicated. Like, you know --

Q Yep.

A -- can't use you.

So, you know, we sent them packing. They got upset. They said a bunch of stuff on social media.

Then they had some other group from -- I think they were from, like, southern

Kentucky. I mean, those guys were pretty cool. You know, they didn't cause any issues. And then, you know, some older -- some older group. There was a bunch of guys in their 60s.

But, you know, he puts a call to action out, there's no telling who's going to show up.

Q Right.

Do you recall which group, though, these people were from, like, the actual names of the groups?

A Not all of them. Only that group I had the problem with, the Kentucky Mountain Rangers or something like that.

And then the guys from the -- like, the older guys, that guy, he was -- like, he was an older White male, and we had a confrontation with BLM one day. They came to the hotel where, you know, we were gearing up to walk across the street to the business. And, you know, Black Lives Matter came. They had a consortment of media people with them, you know? And it was probably -- it was right around a good -- shit -- probably couple hundred of them. You know what I mean? And they were -- you know, I mean, they were pretty hostile.

And so me and Stewart talked to them. But, like, you know, these older guys that was there, one of them, you know, tried to get on his car, and, you know, he had his finger in his trigger well on his rifle and stuff like that. And so, you know, he's -- but these are the guys that you remember, because of stuff like that. You know what I mean?

But, you know, we had the -- we were talking to the BLM guys, and, you know, this was going on behind us, you know? And I didn't realize it was going on until I seen it in the papers. And then, you know, it was a couple other guys who had the same thing

going on, where they were showing pictures of people who were out there with the Oath Keepers. They had their fingers in their trigger wells and stuff like that. A bunch of scared people.

And so, you know, these kind of things happen when you invite just the run-of-the-mill persons, like, anybody out.

Q Right.

A So, like --

Q So what I hear is you all were trying to deescalate. Is that right, it sounds like?

A Yeah, you know, because --

Q Yeah. And people behind you had their finger on the trigger well, which obviously might not have deescalated the situation. Is that right?

A Yeah.

Q Okay.

A And, yeah -- and, you know, once they seen it, they start pointing them out, they start getting around them. You know, you know how it goes. Mob mentality starts to take over. "You gonna shoot me? Shoot me." It's just --

Q Yeah.

A -- you know, stuff like that.

And I'm like, listen, bro, look, we're not here to stop you guys from rioting. You know, like, the police can deal with that. We're just here to make sure you don't, you know, destroy these buildings, these properties. You know what I mean?

Like, we're not trying to have any conflict with you. Like, do your thing. You want to go destroy the city? That's fine. You just won't destroy these properties.

Q Right.

A You know, and they left. We never had another interaction with anybody after that.

Q So I was going to ask, like, other than that incident, did you all have any incidents at the businesses that you all were patrolling or taking care of?

A No. We didn't have any other incident.

Well, the police came down one day -- one night. Like, you know, I put guys on the roof. I told them, hey, look, you know, don't be seen on the roof, okay? Don't be seen on the roof. You know, it's like a bunch of privates in the military. They're all standing up. They're pointing shit. You know, they're yelling.

And so the police come, and they're like, hey, we got guys on the roof. And so, like, it was a different sergeant than the guy I spoke to. But, you know, I wouldn't really call it a situation, but, you know, it is something that happened.

Q Got it.

You mentioned the law enforcement. You mentioned meeting with the firefighter lieutenant. Did you all meet with, like, local actual police officers, as well, while y'all all were there?

A We did. We did, down in Louisville. I mean, and, generally speaking, like, every time -- you know, Stewart says, every time we go in somewhere, he wants to make sure he talks to law enforcement and the authorities over whatever area he's going to be in, so there won't be any confusion or any discrepancies, because he doesn't want conflict with police departments.

And so, when we got -- you know, when we were starting to get stationary, we actually physically walked down and talked to the police that were there. And we went to the fire department, you know.

Q And what was their -- you already described the reception from the fire

department, but how did the police perceive you all? And what --

A You know what? They actually took pictures with us, you know. Now, you know, while some guys were like, hey, man, they're cool, wanting to take pictures of us, I was like, no, that's not why they're taking pictures with us.

Q Okay.

A You know what I mean? But, I mean, they were cool with it. You know, he was like, well, hey, man, you know, as long as you guys aren't down there, you know, threatening people and pointing weapons and stuff like that, we don't have any issue -- you know, we won't have any issues.

And so we told them we had permission from the property owners. And they were talking the full spiel about what was going on. And they were pretty cool. He gave me his card and told me, if stuff started getting out of hand, to, you know, give him a call, and if he had available officers, you know, he would send them down there.

Q Okay.

So did it seem like, I guess, there was a previous relationship between the Oath Keepers and this law enforcement group? Or just you all just created that connection and --

A Yep. Yep. We just --

Q Okay.

A Yeah. We just walked down there and, you know, introduced ourselves, let them know what's going on, and make introduction.

Q I guess, overall, how would you describe that job, that experience, during the Louisville protest?

A You know, I'd say -- you know -- and I say this a lot, you know: Boring is best, you know? You know what I mean? If you can go to a job and be bored, great.

And so we had boring nights. You know what I mean? So I think it was a good operation.

And, you know, it went so well that nobody even knew the Oath Keepers were -- like, it was -- you know, other than the Black Lives Matter confrontation, nobody knew, you know, we were there. Like, you know, after that confrontation, they came down, people were taking pictures and stuff like that, and, you know, somebody said, you know, who invited the White racists into town, and stuff like that.

But, outside of that, like, the operation was great, you know, operation went smooth. Nobody got hurt. Nobody went to the hospital. Nobody had to point their gun at anybody. Nobody got shot. You know, nobody got arrested. And the businesses didn't get burnt up. The owners didn't get beat.

You know, everything was cool, on my end. You know what I mean? Like, we had to send a couple -- like I said, we sent a group home, you know -- actually, sent more than a couple people home. But, you know, these things happen.

Q All right. So, almost like in the military, no debrief is a good brief, right? That's kind of how you viewed it?

A Yep. Yep.

Q Okay.

[redacted] Well, we've been going for about an hour and 10. Let's take a 5-minute break and come back at 11:15 eastern time. And we'll start, when we come back, just so you can prepare, with the November post-election rally in D.C.

The Witness. Okay.

[redacted] All right. We'll be back on the record at 11:15. We'll go on recess now.

[Recess.]

[redacted] We'll go back on the record at 11:16 a.m. eastern time.

BY [redacted]

Q So, Mr. Simmons, we want to now fast-forward to the November 2020 election.

Before we get to the November rally in D.C., I guess, were you in contact with Mr. Rhodes or other Oath Keepers around the election time? I guess you were in Detroit, right?

A No, no. So, at the election, you know, in between Louisville and when I went to see Kellye, hadn't talked to anybody in the Oath Keepers. You know, not -- let me think. I might've talked to Landon once or twice, but --

Q And where's Landon again? Kentucky? That's the Kentucky Oath Keeper?

A Yeah, but --

Q Okay.

A So, like, here's the thing about Landon and the Oath Keepers. Hardly an Oath Keeper. Like, you know what I mean? Like, he's out of the loop. In fact, he didn't know about the operation in D.C. until I asked him was he going to go.

Q Gotcha. Okay. That's helpful.

So how did this operation on November 14th in D.C. come about?

A Well, Kellye -- you know, from my end, Kellye wanted to go down there because they wanted her to speak. You know, she had, you know, spoken about what she's seen and, you know, the election fraud and stuff like that. So Kellye wanted to go down there.

And Stewart was like, well, hey, you know, just, you know, stay with Kellye. I was like, okay. You know?

So I had left Kellye, and then I went back, and I met them at some guy's house

they were staying at in Virginia. You know, I met --

Q Was that at the farm?

A Huh?

Q Is this at the farm?

A No, it wasn't the farm. It was another guy. We was, like --

Q Is this --

A -- probably, like, 40 minutes from the farm.

Q Is this Mr. Caldwell?

A Huh-uh. I don't remember his name. I don't remember his name.

Q Okay.

A But, you know, we stayed at his house. And then all the Oath Keepers that were coming in were staying at Caldwell's farm.

Q Okay.

A Like, the farm was Caldwell's property, basically. Like, you know what I mean? And, you know, I call it a farm, but, like, I didn't see any animals. It was just a -- this guy's got a bunch of land. You know what I mean?

Q Do you remember where it was, where he had the -- where this land was in Virginia?

A It was about 45 minutes away from D.C. So maybe outside of Alexia -- or Alexandria.

Q Okay. I'll just name -- is it, like, Loudoun or -- do these names ring a bell? Will the name of the town ring a bell?

A No, not to me. I mean --

Q Okay.

A -- I drove, I met him -- you know, I drove out to meet him, and, you know, we

went to some house, and we stayed at this guy's house. And it was me and Kellye and Jeff and Stewart and everybody at the farm.

Q And when you said Kellye, about, like, she wanted to speak, this is Ms. Kellye SoRelle, not Kelly Meggs, right?

A Yeah, yeah. Kellye was supposed to speak at this -- I think it was the -- I think the first rally was actually, like, the march.

Q Okay. Yep, yep. And this is the one on November 14th.

So, I guess, how was the job described to you from Mr. Rhodes?

A He just was saying, hey, man, just, you know, stay with Kellye. Like, I wasn't a part of the Oath Keeper operation. You know, my primary job was still protection of Kellye.

Q Was there --

A It was me, Jeff, and Kellye.

Q Okay.

So there was, like, a separate, I guess, maybe, Oath Keeper event thing going on, and then there was, like, you and Mr. Morlock, and your role was just to protect --

A Protect Kellye.

Q -- Ms. SoRelle?

A Yeah. So we still had Kellye.

Now, Kellye was going to meet some lady that was with Alex Jones, and they both were supposed to speak. And she was some kind of -- you know, she was some kind of protester of something or another. Like, you know, when all the stuff was going on, people were coming out of everywhere, protesting this, protesting that, activists against this or that, you know, just a bunch of stuff that they were against. Like, the Marcia (ph) lady was against, like, vaccinations and -- it was a bunch of different shit -- stuff, you

know?

And so we were to meet with Alex Jones, his security people, and the two chicks. And so, you know, when I was thinking about it, I was like, well, hey, look, we'll just group them all together, and we can just all walk around them. You know, Alex Jones' security and me and Jeff, you know, we'll just put them all in a box, and we'll just walk with them. And that's ostensibly what we did.

Q Okay.

A Now, Stewart and the Oath Keepers, they wanted to go and do security for people at the march, or the protest. Because, you know, he's like, well, hey, you know, generally -- because I guess they had went to a couple different protests where antifa was jumping on people, you know, just attacking people. So he was like, well, hey, look, man, we're gonna watch the crowd and make sure they don't get attacked. And so that was what Stewart's and the Oath Keepers' mission was. They wanted to provide security for people leaving the event.

Now, when we got there -- so me and Jeff and Kellye were riding in one vehicle, and, you know, we were all gonna meet Alex Jones' security people. Well, Stewart brought in a guy from Texas, some guy who was an Oath Keeper. Like, he'd left the group, but he was a constable. And so Stewart was like, hey, you know, he was the guy who was actually running the operation.

Q Was this Mr. Enlow?

A Huh?

Q Is his name Mr. Enlow, last name Enlow?

A What's his first name?

Q I can get that. Let me check real quick.

A He was a constable.

Q Okay. We'll come back to that.

A Okay.

Q I'll get a name for you, but --

A Sure.

Q Okay. Keep going. Sorry.

A So he was running the security operation. And, you know, we were supposed to meet with Alex Jones' security the morning of the rally. Because he was, like, well, hey, man, you know, I know Alex Jones. And matter of fact, he does security for the "Louder with Crowder" guy.

Q Okay.

A And so he knows Alex Jones' security. And so, like, he's like, well, hey, look, you know, we're just gonna -- you know, we're gonna meet Alex Jones' security. And so, when we came up with the idea to put them all in a box and walk with them, he's like, all right, well, we're going to coordinate with Alex Jones' security. So he had to meet them at, like, 8:00, 7:30 or 8:00, at some hotel that they were staying at, and we were all supposed to coordinate.

What ended up happening was, this guy gets on the ground, he leaves with Alex Jones' security detail, and we just don't see him. You know, we get there, we don't see him. Well, Stewart's like, well, man, have you heard from -- I don't know what the hell his name was. Have you heard from this guy?

Q Is that Tim?

A Huh?

Q Is it Tim Enlow?

A No, man. I don't remember what his name was. I don't think it was Tim, though. It was -- it was a -- like, he was a damn constable. Like, he left the group.

You know, they had a falling out about one of the rallies.

So the guy gets there. He walks off with Alex Jones' security. Like, he's with Alex Jones. Like, Alex Jones is his job. But he's supposed to be running the whole security detail. And, you know, he's supposed to make the introduction between me and the rest of Alex Jones' security and these other ladies who were there.

So, you know, we're driving there, and Stewart and them leaves from the farm. Now, Stewart's like, well, hey, you know, we're gonna set up -- you know, we got -- you know, he was telling me how they were gonna set up.

And, like, you know, they had a local guy who was supposed to drive them around because he was familiar with the area, and he was gonna be the driver. And they're gonna run a QRF, you know, and he's gonna be the driver in case somebody needs to be evacuated for medical. He's gonna be able to find his way in there, drive up in there, pick up the guy, and extract him for medical aid. And, you know, if stuff gets kinetic, you know, he'll be able to -- because he's a local guy, right? You know, he'll be able to come right to it.

Well, so we're all driving there, me, Kellye, and Jeff. And then Stewart and those guys, you know, I hadn't -- you know, I hadn't been able to get a hold of Stewart. And so, like, you know, we get there. It's kind of late. And so, like, we park outside. We walk, like, damn near 40 minutes to get to everything.

Now, we can't find the guy who's in charge of security. They're already gone. The rally's getting ready to start. Like, they're starting to walk. And so, like, when we get to and see the crowd, you know, Alex Jones is starting to walk up the street with these other two ladies. They're on the megahorn.

Like, Stewart and them still not there. So they're late. Stewart's pissed. Like, man, this guy, man, he don't know what the hell's going on. But this is the driver who's

supposed to be the local guy who's supposed to know everything. That guy was Caldwell.

Q Oh.

A Completely lost. Like, you know what I mean? And he's supposed to be the local guy. You know, he's over the -- you know. And so it was Doug and his North Carolina guys and the Caldwell guy. And, like, they're late as hell.

So, by the time we get there, you know, the whole rally's going on. You know, we're walking with Alex Jones, you know, just up and down the street. You know, he's yelling on a megahorn. You know, Alex Jones, out of breath. You know, we thought we was gonna have to defib him. It was crazy.

So Stewart and the other guys, like, they show up late. And, you know, at this time, now we're, like, just about at the Capitol. Stewart and them is just getting set up, you know what I mean? And so, like, now the rally is over.

You know, Doug's been walking. They're tired. Doug pulls everybody out because, you know, somebody said the operation was over. I guess they had a, you know, drop in communication. I don't know, you know, who said what. But Doug ends up pulling all these people out. So the march is over. Like, everybody's walking back to their car. Sun's going down.

But now the antifa people is battering people. Like, they're jumping on people, they're sending people to the hospital. They're tearing up hotel -- like, you know how you got the little dinner area outside at hotels? Like, they're snatching people off of tables. Like, they're doing all kind of stuff.

Now, the police are surrounding the Black Lives Matter people that came out of the Black Lives Matter Plaza. It was like, you know, probably a small army of police officers surrounding the Black Lives Matter people while antifa's tearing shit up. Like,

you know, they're jumping on people, sent a couple people to the hospital.

There's no Oath Keepers on the street. Stewart's upset. Doug snatched all these guys out. You know what I mean? Stewart's like, well, what the hell happened? Like, the whole reason for us to be here was to provide security for people walking. Like, we had so many people, this shouldn't have happened. So Stewart took it personal, you know.

So now he's upset. You know, we talk about it. Like, now we're -- you know, like, the event's over. Like, we're walking around. We're seeing, like, all this stuff happening, like -- you know what I mean? Police around BLM. Antifa still tearing stuff up. You know what I mean? There's police cars going everywhere. You know, all the cops who were walking was around Black Lives Matter.

And, like, we're walking through antifa people, fighting. They beat the hell out of some guy. Somebody recorded it. You know what I mean?

And so he's like, I'm gonna talk to Doug.

It's like, hey, Stewart, you know, Doug's a supreme A-type personality guy. Like, you know, don't -- I wouldn't approach him in front of everybody. You know what I mean? Just, like, you know, talk to him on the side.

No, no, no, he needs to own his -- you know, he needs to own it. You know what I mean? Like, he's gotta understand.

Well, you know, Stewart calls him out in front of all these people. Doug got upset, and they fell out. You know, Doug's -- you know, now Doug's upset. He's talking about, hey, look -- you know what I mean? He doesn't say it there, but, you know, eventually he said he was going to start his own group. So, like, Doug started doing a bunch of stuff to underhand Stewart.

But that's how that first rally ended. Like, you know, we were just walking with

Kellye, Alex Jones, and, you know, these other two people. And after the speech was over, we ended up meeting with Stewart. We told him, hey, man, you know, this guy just bolted off. Like -- you know what I mean? It was like, he didn't run the detail at all. And then he's like, there's no Oath Keepers on the street. People are getting jacked up.

So, like, we ended up meeting Alex Jones at a hotel for dinner. You know, we talked to some of his security guys and stuff like that. And then, you know, we were out. We left, and then the next morning we went back to Caldwell's farm. And that's where Stewart and Doug exchanged words about what was going on.

Q Got it.

A You know, like, an after-action review.

Q I do want to break down -- so you mentioned that there were QRFs for this November rally. I guess, what were these QRFs? So you said "in case things get kinetic." So tell me what the QRF was, and --

A So --

Q -- what type of action were you expecting?

A So, now, Stewart had a belief that, you know -- because Trump was saying that -- you know, Trump was saying that, you know, he wasn't going to leave the White House or something like that. And so Stewart felt like they were going to storm the White House and forcefully remove him. So, you know, he wanted to be prepared in case that happened.

He's like -- you know, Stewart felt like Donald Trump was actually gonna call up -- you know, call on them as a militia and call up other groups as militias to come and defend the White House, come defend him at the White House, because these groups of people were gonna be allowed to storm the White House.

And so, you know, when he told me, you know, my reaction's like, Stewart, there's no way, okay? Like, I laughed it off. Like, I'm laughing at him as we're talking about it, but, like, you know, like, he laughed with me, but he was serious. He was like, no, man, I'm serious, man. And, you know, if it gets kinetic, I just wanna be ready.

So he had a guy in the van waiting outside of the city. The thing about it is, he probably had a gun or two, you know, maybe a rifle. Like, he had, like -- it wasn't like he had a truck full of damn guns. He had, you know, his gun, maybe a rifle, some body armor, you know, maybe somebody else's gun. It wasn't, like, a whole arsenal.

But the thing about it is, this is the same guy who got you lost on the way into the city. He obviously don't know where the hell he's going. You're still upset with him because he was, like, an hour and a half late because he wanted to take a shortcut.

BY [redacted]

Q So the QRF for the November rally was Mr. Caldwell. That was it. Right?

A Caldwell and supposably Doug, but Doug ended up, you know, being out there and pulling everybody off. So it ended up being Caldwell in the van and somebody else in the van.

Q Do you know who the other guy was in the van?

A I don't know who the other guy was. It was Caldwell and somebody else in the van. But --

Q Do you know where the van was outside of the city?

A The van was on the Virginia side somewhere, and --

Q You don't remember where, though?

A I don't know where. They said some, you know, some plaza, some shops or something like that, some plaza where they were sitting. But, you know, the guy who was driving the van didn't know where the hell he was going, didn't know what the hell

he was doing.

And then, too, like, you know, we walked probably, you know, that day, close to 20 miles walking. And so you couldn't get a vehicle on the streets, there was so many people. So it was like, you know, QRF is absolutely ineffective. On top of that, the driver don't know how to get to you.

And so, I mean, Stewart's pissed about Doug pulling all those people out, but, like, you know, when we were talking about it, like, how he was going to set up the QRF, I was like, Stewart, you know, you do know the White House has an arsenal, right? Like, these guys aren't going to get through the front line.

Q I guess that's what I was trying to figure out, is, why -- and under your opinion -- did Mr. Rhodes think that former President Trump was going to call militias --

A Don't have a clue, man. You know, like I said, when Stewart told me, like, we were face to face, and I was, like -- like, I was laughing. Like, Stewart, it's not going to happen. Like -- but my --

Q Did you think at all that Mr. Rhodes had actually talked to former President Trump about this, or was it you just took it as him just kind of talking about it?

A Who? Stewart or Trump?

Q Stewart.

A No. Stewart thought that Trump was going to call him. I was like, Stewart, that's insane. He's like, no, man. But, even still, if it gets kinetic, I want to be ready.

So -- you know what I mean? So, like, you know, he might've played it out, but, like, I laughed at him and told him, you know, Stewart, you know, they have an arsenal at the White House.

Q Do you recall Mr. Rhodes ever talking to former President Trump or him

telling you that he had talked to former President Trump?

A No. No.

Q Okay.

And going back to the two women that were with Mr. Alex Jones, you said Virginia. Is this Ms. Virginia Lessard? Was that one of the women?

A I don't know their names. Well, I don't remember who they were. I know one of the ladies were, like, whoever the lady is that Alex Jones deals with, messes with. I think it might be his trophy wife or whoever.

Q Okay.

A And then there was another lady -- it was four total women.

Q Okay.

A You had Kellye, Alex Jones' wife, and then you had a lady in heels and a lady in boots. The lady in boots was some kind of activist, and the lady in heels was, like, against, like, vaccinations and stuff like that.

Q Right. Was the lady in boots, was she Latina? Do you remember that?

A I don't remember.

Q Okay.

A She looked White, but she could've been Latino. But I don't remember.

Q Got it.

And for the protection, you said it was you and Mr. Morlock again?

A For Kellye. Now, Alex Jones had his own security there.

Q Okay. I'm just trying to make sure I close the loop on -- and how much were you paid for this job?

A For that job, I was paid same rate.

Q Okay. Just to make clear, so it was how many days and approximately how

many -- $200 a day?

A $200 a day. So we went from D.C. When we left out of D.C., we went down -- I think there was another rally in Georgia.

Q Okay. Yeah. We'll get to that one in a second.

So $200 a day. How many, I guess -- you have you and Mr. Morlock doing Ms. SoRelle's protection. If you had to estimate, how many Oath Keepers were present for, kind of, the street protection that Mr. Rhodes was envisioning?

A I don't know, man. I know the crew that Doug had was pretty big. Probably -- maybe 30 guys maybe, total.

Q Okay. So it was primarily Ranger Doug that organized that, so North Carolina. Were there Florida Oath Keepers as well?

A Might've been a couple guys from Florida. I don't -- like, none of the guys from -- like, I didn't see a lot of guys in the Florida group that were in Louisville. Like, it was maybe one or two. But, like, by and large, like, the group that was in Louisville, a lot of them didn't go to that first -- or I didn't see them at the --

Q Right.

A -- first rally. I mean, because, like, they were all camped out at Caldwell's farm, and I didn't get there until nighttime. It was a lot of people out there, but I didn't see everybody's face.

And then, when we went for the after-action review, a lot of people had already left. I mean, because they were upset about how the things played -- because some people came out there to, you know, do that security, and when Doug made them leave, they felt like it was a waste of time. Like, a lot of people was upset about it.

Q And going back to the antifa -- you were talking about antifa and some of the conduct. Did you witness this conduct, or is this what you saw, like, on the internet

after the fact when you got back?

A No, I witnessed it.

Q You witnessed it? Got it.

A Yeah.

Q And did you know the difference between, you know -- and I think this might be obvious, right -- the antifa folks and the Black Lives Matter folks you described? How were you able to discern the difference?

A Well, for starters, they were White. And, you know, like, a lot of antifa guys dress the same -- bunch of scrawny White guys with tight pants, all black. They've got on riot gear. You know, it's the same look from Louisville. You know, they had the little makeshift shields with the face covers so they wouldn't get sprayed with mace.

And so, you know, they'd move around in huge groups. You know, they get to circling around people, and then they start to go at people.

Q Okay. And you said you started to witness antifa once the sun went down. Is that accurate?

A Yes. Once the sun started coming down, you start seeing them in groups. And, like, you know, when they were first -- when I first seen them walking in, it was, like, a huge group of them. And they were all together, and they had megahorns and stuff like that. And, you know, they were just -- they were just walking.

And when the BLM people came out of Black Lives Matter Plaza in D.C., the police started to surround those guys, and the antifa guys just kind of broke off. You know, they started going different directions. And, you know, they just started causing havoc.

Q Okay. And so, in your mind, the antifa folks were targeting some of the Trump supporters that were in the city for the protests?

A They were targeting anybody they could, you know, surround and jump on.

And it's like, I don't know, like, what they were picking out, but, you know, they were attacking people. And then they were going past hotels. People were eating outside. You know, they'd climb over the railing and, you know, dump tables over. It was insane.

Q If you had to tell me -- and I know this is always tough, like, when you're in a -- I'm not going to say combat environment, but in an environment where there is violence of some sort -- approximately how many incidents did you witness with antifa during the November rally in D.C.?

A I seen them at the hotel. I seen them beating up a guy in the street. I seen them fighting another guy. And then I seen them snatch a guy off a bicycle. Four for sure.

Q And in each of these, it was, in your opinion, antifa antagonizing, or was it just, like, mutual antagonistic-type behavior?

A I would say all antifa, you know, because, you know, like, when people started to walk away, you know what I mean, there were just groups of people walking, and then, you know, these antifa guys started following them, and, you know, they're exchanging words. And next thing you know, like, they start to surround them.

Like, you know what I mean? Because, like, it's like, when groups broke down to smaller groups, they started getting attacked. You know what I mean?

Q Got it.

A So, like, groups of 3 and 4, you know, here comes a group of 10 or 12 guys, and, you know, they circle around them. They start snatching on, pulling on them. And then, you know, it just gets progressively worse.

Now, at the hotel, when we walked past the hotel where they were sitting down eating, it was just like, they just walked up there and jumped the rail and just started flipping over tables, just, like, almost on cue. Like, you know, they just walked up here,

jumped the rail, and just, you know, dumped a couple tables over. You know what I mean? Like, people were sitting there trying to eat. Like, they didn't attack any of the people eating there, but they were just dumping over tables and stuff. They jumped back over the rail and just kept walking.

Q And you mentioned a hotel where Mr. Rhodes and Mr. Alex Jones, I think, had dinner that night. Do you remember where that was?

A I don't remember what the hotel was. It was a -- I don't remember what the hotel was. It was not far from the -- where the hell was it? It's, like -- that Freedom Plaza thing? Like, it's a couple streets up there from.

Q Okay. Was it, like, the JW or Willard? Does that ring a bell?

A Maybe the Willard. I know it wasn't the JW.

Q Okay. And do you remember what was discussed? I guess, what were they talking about, if you remember, Mr. Rhodes and Mr. Jones?

A Well, it was just -- it was just a dinner for the security and the people who were there. It wasn't, like, you know, any kind of discussion. Like, they were just -- everybody was just talking.

Q Do you recall seeing any Proud Boys or Three Percenters or other groups out there at the November rally?

A I seen Proud Boys. You know, they got the yellow and black on. But, you know, they were all together. They didn't -- like, I just, you know, I seen them. They were actually in front of the square that we created for Alex Jones. It was, like, a line of Proud Boys in front.

Q Were you all working with the Proud Boys, or was that just coincidental?

A Well, we wasn't working with the Proud Boys, you know. We were only supposed to work with Alex Jones' security. Now, when we got there, the Proud Boys

had created a line for Alex Jones, and they were -- they were, matter of fact, in front and in back. And so, you know, you had this square -- like, we were around Alex Jones and these women, and then you had a line of Proud Boys in the front, and then it was a couple Proud Boys behind them.

Q Do you remember if there was, like, a point of contact with those Proud Boys? Did you talk to any of them?

A No, we didn't, not me and Jeff. You know, I don't -- and I don't remember Stewart talking to them either, but -- and I didn't even know they were going to be there. Actually, that was my first time seeing Proud Boys.

Q What were they like, I guess, in general? What was their demeanor compared to the Oath Keepers' demeanor?

A At that rally, they were just walking in front of Alex Jones' security detail. You know, they didn't really do a whole lot of talking.

Q Okay.

[redacted] Do any other staff members have any questions on the November rally before I move on to the Georgia rally?

Okay.

BY [redacted]

Q Okay. So you said you went down to Georgia right after this, right, for a rally? Tell us about that.

A The Georgia rally was pretty small. Well, it was a smaller rally, significantly smaller, compared to the rally in D.C.

And the same guy who was in charge of the security for D.C. was in charge of the security for that Georgia rally. And, you know, some of the same people came out. You know, I met Josh James at that first rally, and Josh James had came back out for the

D.C. -- I mean, for the Georgia rally.

But it was significantly smaller. Same guy ran the security detail, and he ended up doing the same thing. He just, you know, ended up bolting on the group. And so Stewart asked me to take over while he was gone and when he came back.

So it was the same thing. It was security for Kellye. Kellye was, again -- she just wanted to go to that rally. I don't think she was supposed to speak. But, like, it was in front of the -- I think the Georgia State house.

Q Yeah. Yep.

Well, so wait. Was the guy who was supposed to be running the security for this, was it Ranger Doug again?

A No.

Q Who was the guy?

A It was the same guy who was running -- who was supposed to be running the first D.C. rally.

Q Do you remember his name?

A I don't remember his name. Like, he's a Texas -- he was a Texas constable.

Q Texas constable. Okay. Got it.

A Yeah.

Q And so you got kind of promoted to running the op for Georgia? Is that kind of when it happened?

A So what happened was, Stewart had some guys that was coming in, and they needed to be picked up from the airport. Well, the guy who was running the security operation, he came in, and he had a friend with him and another guy. You know, some guy from the police department he was working for came in with him. And so he wanted that guy to co-run the operation with him.

And, you know, Stewart didn't want it to happen like that. You know, he was like, well, hey, man, you know, I want Whip to be second in command, but, you know, he's doing security for Kellye, so, if anything happens, you know, and you can't step in, I'll just ask Whip to take over.

Well, he wanted his friend to be second in command. I was like, well, you know, Stewart, I'm not really here for that. You know what I mean? You can have him do whatever.

He was like, well, no, man, you know, this is how I want things, and, you know, this is what I want to do.

And so, you know, they kind of, you know, had a couple words about it, but, you know, like, it was some drinking going on the day before, and you know what I mean? You know, there was tempers, stuff like that. You know how it is when men get to drinking.

Q Yep.

A So the rally starts, and we get there. You know, like, I'm not letting Kellye go in the crowd. Like, you know what I mean? It's not smart to be in the crowd, first of all, okay? We're not gonna get in the crowd. So we're watching it from across the street first.

And then Stewart, you know, wanted her to come up on stage, because I think they was going to, you know, let her say a couple words. And, you know, it was one of Ali Alexander's deals.

Q Okay.

A And so, you know, we get to moving to the stage and stuff like that. And so, you know, Stewart looks up, and this guy just bolts. Like, he told him he was going to pick the guy up from the airport, but when he left, he took, like, everybody he came with.

Like, the two guys he came with, they all left together.

And so they had guys on each corner watching. And then a group of antifa showed up. Like, they were coming, and it was -- hell -- a couple hundred of them. You know, they were a huge group. Huge group.

And Stewart's looking around for this guy. He was like, man, I can't believe this fucker just left us like that, you know? Hey, man, you know, we got antifa coming in, man. I need you to step up and, you know, take control of the security situation.

I was like, well, hey, man, you know, if they don't do anything, there's not a reason to provoke them.

Q Right.

A And so, you know, we stood there. And, you know, the rally's getting close to ending, and, you know, now it's coming to a close. Well, you know, Stewart's like, well, hey, man, I don't want another D.C. incident. You know, let's -- you know, let's figure out what the plan is.

I was like, well, hey, the parking lot's across the street from where the rally is. You know what I mean? So, like, we can just have guys, you know, just scattered around from here to the parking lot. And that's what we ended up doing.

But, you know, these antifa guys started walking around. And then -- I mean, that really was it. You know, we went to a restaurant after that, had chicken and waffles. And that was really it. I went home. And then there was another -- it was another D.C. rally after that.

Q Yep. Yep. We'll get to that. Right.

So was the constable John Shirley? Was that his name?

A Yep.

Q Got it. Okay. So he was the one supposed to be doing the security and

then bailed, it looked like, two times?

A Yep. And we planned --

Q Okay. Do you remember the reason why he bailed?

A Well, I know the second time it was because Stewart didn't let his friend in the position that he wanted his friend in. But, like, the night before, they were drinking, and Stewart, John, Josh, and the two guys that he brought, or the guy that he brought with him -- two guys he brought with him, they were drinking.

And, you know, Kellye was sitting there, and, you know, Josh was sitting there next to Kellye. And, like, you know, this guy, the drunker he got, the more aggressive he started to become, you know what I mean, the more touchy he was. And him and Josh ended up bumping heads.

And, you know, they're going back and forth. He's telling Josh how he's been a cop for such and so on, so on, so on, so years. And Josh is like, hey, man, I'm not going to have a dick-measuring contest with you, because mine is bigger. And, you know, then he was ready to fight.

And so I was like, hey, man, I'm out. You know, so I go back to the room, and Stewart comes up there. He's like, man, I can't believe these guys was getting ready to fight. So it's like, well, hey, you know, alcohol.

So John comes in the next morning apologizing for his friend, but, you know, like -- because me and Stewart stayed in the same room. And, you know, Stewart snuck out. You know, I don't know where he went for sure, but, you know, I got an idea. But he came back in the morning.

John came in there. I was getting dressed, was getting ready to go to the rally. And, you know, he was pleading his case about his friend running the operation with him. And he was like, well, no, man, if something happens, you know, I trust his word more,

and stuff like that.

I was like, well, Stewart, I'm not -- I can't do two things at once. You know what I mean?

Q Yeah.

A So just let him do it. He was like, no, man, fuck that guy.

And so, you know, when the guy came in from the airport, John left, and he took the guys that came with him, and, like, they were gone.

Q Right.

A And they didn't come back. Like, you know, I mean, they -- when they did come back, everything was over. It was like --

Q All right.

I guess a question I should've asked in the beginning -- and this is something we're aware of, but I want your -- was Mr. Rhodes and Ms. SoRelle -- are they in a romantic relationship, just from your understanding?

A I would say. I mean, probably not at this moment, but, you know, they -- it was some fooling around going on.

Q Okay.

A Now, I didn't realize that until I went out to -- like, I wasn't sure of it until I went to Texas.

Q Gotcha. What happened in -- when did you go to Texas?

A I went to Texas in February. You know --

Q After January 6?

A -- Kellye had some issues -- yeah. Kellye had some issues in February with people coming -- I mean, she was paranoid, you know, at this point, scared, stuff like that.

And then, you know, she -- Kellye would go off the deep end pretty

frequently -- well, I ain't gonna say "pretty frequently" -- but semi-frequently about QAnon shit. And, you know, that's so far left field. You know, I was like, Kellye, think about it. You know what I mean?

Q I don't want to divert too much, but it sounds like Ms. SoRelle -- you're describing her as paranoid and just reading conspiracy theories, like, QAnon conspiracy theories? Is that --

A At that time, yeah. She was definitely spooked, and she felt like, you know, she needed protection still. And I was like, all right. You know what I mean? So I went down there.

And, you know, she said somebody had been, you know, camping out and watching her at her law office and stuff like that. Well, you know, as it turns out, like, her and her husband had started the process of getting divorced and stuff like that. And I was like, well, you know, Kellye, it might be a private investigator.

Q Right.

A You know what I mean? And so, you know, like, some of the issues she had concerns with, you know, it ended up being, like, something different, you know?

And so, when she was saying, well, hey, I was followed and stuff like that, well, you know -- when I first got there, you know, it wasn't -- you know, it wasn't anybody -- you know, I didn't notice anything.

And then, you know, one day, we were riding on the highway, and somebody actually was following us, but it could've just been coincidental dumb luck, you know, for them. But, you know, that's the only concern that arised when I was in Texas protecting Kellye. But she felt like she needed protection.

Q So I was going to take us to the December rally you just mentioned. How did that come up? Was it similar to November and the Georgia rally? And what role

did you play, I guess, in the December D.C. rally?

A Well, the December rally, he asked, you know, could I come down. And I told him, you know, hey, Stewart, you know, I don't have anything going on, but, you know, if you want me to come down -- you know, if you foot the bill, you know, I'd come down. And he was like, well, hey, man, you know, just let me know.

And when it got closer, he asked me, you know, could I make it out and help with that rally as well. And I was like, all right, just, you know, cover the bill. And I don't even think I charged him more than -- it might've been -- hell -- a couple hundred bucks for the whole thing.

And the December rally was very small, man. Not really any noise, you know. He wanted to make sure -- I mean, he took that antifa attack personally, so he wanted to make sure it didn't happen again.

And so he came down there, did a call to action. People showed up. But, like, you know, he wanted people able to, you know, fight antifa if they tried to fight the crowd. But, you know, realistically, not a lot of fighters showed up. A bunch of old guys, you know, some Geritols.

And it was like, you know, hey, Stewart, listen, if stuff gets physical in the street, we don't stand a fighting chance. What you need to do is just observe and report, you know, because you don't really have a lot of fighters.

And so the thing about it was, the Proud Boys had thousands of people there. Like, it was so many of them. And they were physically assaulting the antifa guys. Like, when antifa started following crowds, the Proud Boys started following them. So, when they started gathering around people as before, you know, the Proud Boys started attacking them. Like, you know, they started pushing them into conflict, and -- you know what I mean? Basically, you know, just, hey, poking them. Hey, well, look, you

know, hey, you know.

And so every crowd of antifa you seen, you seen a bigger crowd of Proud Boys. You know what I mean? And --

Q Do you recall --

A -- the thing about that -- go ahead.

Q I'm sorry. I was going to say, do you recall Mr. Rhodes, I guess, requesting Proud Boys to come? Or was there any kind of coordination between Oath Keepers and Proud Boys?

A No. See, the thing about the Proud Boys and Stewart, like, Stewart didn't really agree with the Proud Boys, because, like, they let anybody join. You know what I mean? Stewart said, you know, him and the guy who used to run the Proud Boys had words because, you know, he has known White nationalists and White supremacists join, and, you know, he don't care as long as he get the numbers.

So Stewart really had a issue with the Proud Boys because of that. And so, like, there was no coordination with it.

When we got there for that other rally, I mean, the Proud Boys, hell, they had people who was just in yellow shirts, like, you know, didn't even have the Proud Boy look, who was walking with the Proud Boys.

And so, like I said, when they broke off into groups, you know, each group of antifa had a group of Proud Boys behind them. And it ended up -- you know, it wasn't an issue that time. You know, nobody went to the hospital -- well, a couple people went to the hospital still. Like, one of the Proud Boys got stabbed by some antifa folks.

But, you know, it was nothing like the first time. You know what I mean? No hotels were trashed. You know, like, a bunch of people didn't get attacked like the first time. Some people still got jumped on, but, you know, nothing that I noticed. Like, I

seen Proud Boys fighting antifa, but I didn't see antifa jumping on crowds like they were the first time. So, you know -- but it was -- I mean, man, they -- Jesus. It was a bunch of them.

Q Do you remember which rally you went to on December 12th? Was it the one on The Mall or the one at Freedom Plaza? Do you remember?

A We were in between.

Q Okay. So it was kind of roaming all the different rallies?

A Yeah. Yeah. We were --

Q Okay.

A -- in between.

Q And where did you stay this time when you came to D.C.?

A I stayed at a hotel, the same hotel from -- matter of fact, it was the same hotel. Every time I went --

Q Okay.

A -- to D.C., I stayed at the same hotel in Virginia.

Q The Hilton Garden Inn?

A Yep.

Q In Vienna? That one?

A Yep.

Q Okay. Is that where Mr. Rhodes and Ms. SoRelle stayed as well?

A At that march in December, I believe -- I know Stewart was there for sure. I don't remember --

Q Okay.

A -- where Kellye stayed.

Q And -- I'm trying to think, was there anything else?

[redacted] Do any other staff members have any other questions about the December rally?

Okay.

BY [redacted]

Q Oh. Do you remember Mr. Meggs being at this event? Mr. Kelly Meggs.

A In December?

Q Yeah.

A I don't remember. I don't think he was there.

Q Okay.

And, approximately, you said there was -- it seemed like there was a ton of Proud Boys. Approximately how many Oath Keepers were there?

A Fifteen maybe.

Q Okay.

A And then, out of the 15, half of them were senior citizens.

Q Okay.

So, actually, before we get to the January 6th planning, were you ever aware of a Steven Brown or Resource Media Group? Did you hear of them?

A No. No. Now, are you talking about Steve, the IT guy?

Q All right. Who is Steve, the IT guy?

A I mean, I'm just saying, like, I know he's got a IT guy. I don't know what his name is, but --

Q Okay. No. This is a Steven Brown, Resource Media Group. Do you know that?

A No.

Q Okay.

And you mentioned Mr. Ali Alexander earlier. I want to go back to that. What was Mr. Rhodes and Mr. Alexander's relationship?

A To my knowledge, they didn't have a relationship prior to that. Like, we were helping with 1AP, and, you know, Stewart knew those guys from somewhere, or knew the guy who was the head of them from somewhere. So, like, we were helping with their security detail. And then I think the first time we seen Ali Alexander was in Georgia.

Q So when did you first meet 1AP? Was it the November rally or the Georgia rally?

A The first time I met them was at the November rally, but, like I said, Stewart knew them, and I think they met during -- like, I know for sure Stewart seen the guy -- like, he wanted to know who the guy was who was organizing the Georgia rally, and it was Ali Alexander. And, like, he you know, went and -- I guess they talked or whatever. But I think Stewart knew the 1AP guy prior to, you know, all the stuff. So, like --

Q Who was the -- I guess I have two questions. How would you describe 1AP in general, and what was your impression of their -- who was their leader, I guess?

A I don't know what the guy's name is. Older guy. I don't remember what his name was. But, I mean, they're pretty professional.

Now, the difference is, with 1AP, from the guys we were working with and the members that I were talking to, like, the guys I was working with, like, you know, they were more or less getting paid, so they're a lot more, you know, professional. Like, you know, they had their shit together.

You know, they had real communications. They didn't rely on, like, the mobile communications that Stewart wanted to rely on and some of the methods of

communicating that we had to rely on that didn't work when it was large groups of people.

So, I mean, they were pretty squared away. And a lot of those guys are vets.

Q Okay.

Does Robert Patrick Lewis ring a bell? Does that name, Robert Lewis?

A Maybe.

Q Okay. Or, and I'll try Philip Luelsdorff? Does that ring a bell?

A No, not to me.

Q Okay.

And I guess, before January 6th -- so, like, I'm thinking about November, December -- do you recall Oath Keepers providing protection for Roger Stone?

A No. Like I said, outside of the Florida group, I don't know of any other Oath Keepers that provided security for Roger Stone. Like I said, when --

Q What about Mr. Alexander?

A Not to my knowledge, no.

Q Okay. And what about General Flynn?

A Not to my knowledge.

Q Mr. Alex Jones? You talked about it a little bit, but did you all provide protection for him?

A We helped with -- I mean, and only because, you know, we grouped everybody to -- because it was just easier that way.

Q Okay.

A Outside of that, you know, I've never been a part of any detail for Alex Jones through the Oath Keepers or any other --

Q Okay.

[redacted] Do any other staff members have any followup questions to that?

All right.

BY [redacted]

Q You mentioned communications. That's where I wanted to go. Did you ever receive a directory or contact list of Oath Keepers when you were working with them?

A No. Stewart would start these conversations on Signal, and he would just put everybody in there. And so you get on there, and when you talk to somebody on Signal, you know, you're talking to the group. You know what I mean? So, like, whenever somebody wanted to talk to me directly, they would send me a direct message. But it was all through Signal.

Q Got it.

A Like, the only people I had personal contact information for was, like, people like Landon. I got -- well, I had Todd's number in my other phone. And then I've never talked to Doug outside of Signal.

Q Okay. So I just want to go through some of these, I guess, different apps to see if you guys were using it.

You've mentioned Signal. Did you all just do regular email typically?

A Not really. Like, if -- because, like, how Signal's set up on my phone, like, if Stewart is going to do, like, some kind of conference call on Signal, I would get an email, like, an email reminder. You know what I mean? And then, you open it up, and it takes you to the Signal chat and stuff like that. But, like, those are the only emails that came for conversations. Like, hey, you know -- it's, like, reminders.

Q Okay.

What about -- you said Signal. Do you recall ProtonMail? Did they use that?

A I didn't use Proton. A lot of those guys did use Proton. I think Stewart had a Proton account set up. I know I was listening to some of the local members talk about using Proton.

Q Okay.

Zello? Do you recall using Zello?

A Not for, like -- so we didn't use Zello for the January 6th rally because, when we attempted to use Zello for the prior rally, you know, it's ineffective.

Q Right. Why is it ineffective?

A Well, some kind of way, like, when your signal goes down, because it's network-based on your phone, like, you can't use it if you don't have a signal.

Q Right. Okay. That makes sense.

Those are similar -- do you not have those issues with Signal?

A Well, so Signal, you can -- you would send a message, and, like, if you don't have a good signal, it'll send out as soon as your signal comes back.

Q Okay.

A But the issue is, you're not going to be able to get those messages if you don't have a signal on your phone either.

Q Gotcha.

A But at least it will be there.

With Zello, when you need to contact -- because Zello is more like a walkie-talkie. So, like, when you need to contact somebody, you know, you key up, and you can't reach them because you don't have signal. Like, you don't have a phone signal, so it's like you're dead in the water.

Q Makes sense.

And did you all communicate via social media at all, or --

A I'm not on social media, so I don't use social media for anything.

Q Got it. Got it. Okay.

And then I want to go through -- because we're now moved on to January 5th and 6th at this point, so thank you for bearing with me for that timeline.

So I want to go through -- I'm going to show you, probably similar to your interview with the FBI, a bunch of pictures, and I just want to ask you to tell me about the person, the interactions you had with them, and just your general impression of them.

A Okay.

[redacted] So, [redacted] can we start with exhibit 26?

BY [redacted]

Q And you've already talked about this individual a little bit. This is Mr. Caldwell. Is that him?

[12:05 p.m.]

The Witness. I can't see. Yep.

BY [redacted]

Q Okay. And, just generally, how would you describe him?

A I mean, he was cool when I met him. You know, he's one of those, you know, likes-to-be-in-charge kind of individuals.

Q Okay. And he's a veteran, right? Is he a veteran?

A Yes. He said he was a veteran.

Q Okay. Let's go to exhibit 11, and this is Mr. Donovan Crowl. Do you know him?

A Only -- I mean, I don't know him. I've seen him, but I don't know him.

Q All right. What was your impression of him from when you saw him, if you had any?

A I didn't -- didn't have really an impression of him.

Q Okay. Exhibit 16. This is Ms. Watkins. I guess, just in general, how would you describe her?

A I mean, you know, he was pretty cool. When I -- so when we first met was in Louisville. Here's somebody who's saying that, you know, they have been in combat, and they got this experience. And, you know, me and Landon and Stewart started looking at each other. I'm like: Well, look, unless she was a he, there's no way she's got any combat experience prior to Obama. And, as it turns out, she was a he.

Q Got you. Okay.

A But, I mean, now, there was -- there was -- there was another security job that Stewart sent some people to. And, I mean, this -- and I don't know the logic behind

it, and so it was -- it was a -- some lady that they wanted to provide security for because she was staying across the street from somewhere where they were doing some kind of protest.

And so Jessica went down with a couple of her people and some other Oath Keepers. And, oh my God, like, it kind of went haywire. Jessica climbed up on this lady's roof and started doing security from her roof. It was the craziest stuff ever.

But yeah, it's -- you know. Outside of that, like, you know, she was pretty cool with me, you know. I didn't have any issues.

Q What was she like leading up to January 6th? Like, when it came to the January 6th job -- and we'll get into that in more detail -- what was your impression of like what she was coming to D.C. to do, if you have any?

A You're talking about Jessica on the January 6th job?

Q Yes.

A Wasn't even a part of it.

Q Okay. Helpful. That's helpful. Okay.

Exhibit 25. This is Ms. Sandra Parker. Do you recall her?

A I don't know her, no.

Q Okay. And we'll go to exhibit 6. This is Mr. Bennie Parker. It's only the back of his head, unfortunately.

A Yeah.

Q Was this one of the guys that came with Jessica Watkins? Do you recall these folks?

A I don't know any one of them.

Q Okay.

A See, like, here's the thing about January 6th and Jessica. Like, you know,

she wasn't a part of the security operation, not initial planning or anything. So, like, I didn't even know she was there. You know, I didn't know she was a part of this operation.

Q I guess the question, and this is more so -- I was going to get into it later, but it makes sense.

She's all throughout the Signal chat, so how did you not know she was part of the operation?

A Because she wasn't supposed to be in the operation. Stewart put her in the Signal chat. And so like, when we were initially planning the operation, like, she wasn't -- she wasn't -- she wasn't really a part of it because, like, we had guys from New York, we had guys from Carolina -- South Carolina, not North Carolina, then the Florida guys.

And so, when we had the meeting for everybody who was going to show up and help with security, nobody showed up. And so like the operation was only the close protection people and those couple of guys from South Carolina who stood around stage seven, Landon, Joe, and like some old guy from New York Stewart had.

Q What was the operation supposed to be?

A We were to -- you know, outside of like the close protection details with Alex Jones -- not Alex Jones, but Ali Alexander had two people. Roger Stone had a team of people. And then the Florida guys said they had some politicians from Florida that they were going to protect, and so that's why they didn't protect Roger Stone. That's why Josh James and his crew started protecting Roger Stone.

And then we wanted guys to stand around the stage while the speakers were speaking and then walk said speakers to their cars after they were done speaking. We didn't end up having enough people to do that. We only had a couple -- a couple -- a

couple bodies, actually.

Like -- like, on the 5th, I was the only one there for several hours, you know, and there was two stages. And lucky for me, one stage faced the other stage. So, like, I was going back and forth in between the stage in front of the U.S. Capitol -- I mean, the stage in front of the U.S. courthouse to the stage on the U.S. Capitol yard.

Q Right.

A And so, when I say she wasn't a part of the operation, she didn't show up for the meeting that we had. Like, the only people who were at the meeting were like a couple -- Josh, Josh and like another guy.

And then the Florida team, I didn't see the Florida team until the night of the 5th and, like, we never really coordinated. You know, like they walked in. They stood around the stage on the Capitol Grounds. But outside of that, like, you know, everybody knew what they were supposed to do.

And so, when I say Jessica wasn't a part of that, like, she didn't get a job, like, you know what I mean? She wasn't at any of the stages.

Q Okay. We'll put a pin in that because we're going to come back to January 5th and 6th and just what everybody's responsibility was supposed to be.

[redacted] Can we go to exhibit 13, [redacted]

BY [redacted]

Q Graydon Young, do you remember him?

A I don't remember him.

Q Okay. Exhibit 22. This is a Laura Steele. Do you remember her?

A I don't.

Q Exhibit 20, this is Kelly Meggs. So I know you've mentioned him already, but what was Kelly Meggs' role leading up into January 6th?

A Kelly Meggs led the Florida group. You know, he's a -- he's a Florida coordinator. And he was in charge of the Florida guys, and they were supposed to be providing protection for some politicians that he said they had from Florida.

Q How did -- oh, the politician was supposed to be from Florida, the politicians were?

A That's what he said.

Q So did Mr. Meggs arrange for these politicians' protection, or was it Mr. Rhodes?

A It was actually -- so when -- initially, I was only supposed to set up the close protection security for Stewart. So I was supposed to say, you know, organize who goes where and stuff like that.

Well, Roger Stone was going to go with the Florida team, and Josh James and his guys were just going to help out with Ali Alexander and Roger Stone. Well, Meggs had called -- like, we had a -- like, Stewart had a conference call and Meggs said that they had a switch in plans where, you know, they needed a team to take over Roger Stone's detail, because they had some politicians who reached out to them for security.

Q Okay.

A And so, you know, I was like, okay, well, you guys take those politicians and Josh and his guys will go with Roger Stone.

Q Do you remember who the politicians were that had called for some security?

A No, I don't. He never said, actually. And when I asked Stewart to try and figure it out, he was like: All right, you know, I'll talk to him.

But I don't think he ever did.

Q Can we go to exhibit 9.

This is Connie Meggs. What was she like?

A I mean, outside of being Kelly's wife, you know, I really didn't have a lot of conversations with her.

Q Okay. Exhibit 21 is Kenneth Harrelson. Do you recall him?

A I met him in Louisville.

Q Okay. What's Mr. Harrelson like?

A He's pretty mild-mannered. You know, he was one of Kelly's guys, you know. He -- you know, he was -- he was a soldier. If Kelly was like, "Hey, man, go here," he'd go there.

Q Got it. Exhibit 24, this is Mr. Roberto Minuta. Do you know him?

A Minuta? Yeah, I met -- I met Minuta at the second D.C. rally.

Q Okay. What's he like? What was his role for January 6th?

A He was pretty cool. You know, he's -- you know, I felt like he was -- he was a good guy. He was working with Josh James' team.

Q Okay. So Josh James -- that's actually -- exhibit 19 is Mr. James.

Josh James, was he considered like a lieutenant almost, like a leader of a group?

A No. He just -- he just had some guys that -- that he was, you know, doing some training stuff with and, you know, they wanted to work together. So, you know, I let him work with the guys that he brought doing security for Roger Stone.

Q Was Mr. Ricky Jackson one of these guys?

A What does he look like?

Q We don't have a picture of him. I was just wondering if the name rang a bill, Ricky Jackson?

A No, the name doesn't ring a bell, but I seen -- I seen a couple people that was with his group. I think he had like six or seven guys.

Q Can we go to exhibit 17.

And this is Jonathan Walden. He had a dog. Do you remember him?

A I remember him. He came later on the 5th of January. He ended up getting in with Josh James' guys.

Q Was he one of Josh James' guys, like --

A Yeah, that's -- that's who he ended up -- like, he came -- he came to help out. And I think him and Josh are -- him and somebody Josh was with knew each other. So he ended up -- he ended up going with those guys.

Q And what was his overall demeanor like, do you recall?

A He was pretty -- you know what I mean, he was pretty cool. He kept talking about his dog and how he had a dog. I was like: Well, hey, man, there's not really a need for a dog during close protection, but okay.

Q This wasn't like a bomb dog or service -- like a working dog or anything like that?

A I don't know what kind of dog it was, bro. Like, he: Oh, man, I got my dog.

Like: We don't -- why would you need a dog for personal protection?

Q Got it.

A But he brought a dog, and, like, he was with this dog every time I seen him.

Q Got it. Okay.

Exhibit 18. Mr. Joseph Hackett, do you know him?

A I don't recognize -- I mean, I can't really see. I don't recognize him.

Q Okay. Ahab I think was his call sign, A-h-a-b.

A I don't know.

Q Exhibit 15, Mr. Jason Dolan, do you know him? That's a terrible picture, by

the way. It's from surveillance so -- he's a Florida guy. Do you remember him at all? His call sign was Turmoil.

A No, I don't know him.

Q Okay. Exhibit 27 is a William Isaacs.

A I don't know him neither.

Q He's also from Florida.

A No, I don't know him either. So a lot or -- a lot of the people who came with the Florida guys, like, I -- you know, if they wasn't -- if they were not at the Louisville protest, I didn't know -- like, I didn't know the new Florida guys he showed up with. So, like, the only guys that I recognized from Florida was the guys in Louisville and the -- the one guy that I met at Crowl's farm.

Q Okay. Got it. Who was the one guy at Crowl's farm other than Kelly Meggs that you met?

A I don't know who he -- you know, I don't know who he was, but that's the only other Florida guy that I knew to be with -- with the Florida guys. And I met him with Kelly.

Q We're about to go through like another three or four Florida guys, so maybe it might be one of these guys.

So exhibit 10 is a David Moerschel. Call sign was Hatsy. He's the one with the red circle around him.

A Yeah, the one with the hat?

Q Yes.

A No, I don't know him.

Q Okay. Exhibit 8, Caleb Berry, his call sign was Breacher.

A Yeah, he -- I think he was at the -- at Crowl's farm.

Q Okay. Got you. So this might have been the other Florida guy?

A Yeah.

Q Okay. And what was he like, Caleb Berry?

A He didn't really say a whole lot.

Q Exhibit 23, Mark Grods, and his call sign was Sapper. Do you recall him?

A Well, I don't recall. You know, like I talked to this guy on one of the Signal chats. He was kind of -- you know, he was kind of a dick when I first talked to him, but he ended up being pretty cool on the chat. But I never -- never really got, you know, interpersonal with him.

Q What was he reaching out to you about on the Signal chats, if you remember?

A I -- I mean, because his call sign is Sapper, so, you know, I asked him, you know, was he a Sapper? You know, that's what I did. Like, what -- you know what I mean, how can you use a name?

And so he kind of was, you know, like, well, who are you to ask me that? I was like, I'm just asking, you know what I mean. So, like, you know, we started talking and, you know what I mean, we started exchanging history. And he was pretty cool after that.

Q Got you. So he was kind of closed off at first?

A Yeah.

Q Exhibit 7 is Mr. Brian Ulrich, or --

A I don't know him.

Q Okay. And then exhibit 14 is a Mr. James Beeks. I believe he was like a Michael Jackson guy.

A I don't remember that. Hadn't seen him before.

Q Okay.

[redacted] And then you can take the pictures down. Thank you, [redacted]

BY [redacted]

Q We don't have a picture for this guy, but Mr. Edward Vallejo, do you remember him?

A No, I don't. And, actually, like, the only time I seen a picture of him was like -- it's like -- I think it's a picture going around of him bringing some stuff into a hotel.

[redacted] Just for the record, it looks like Mr. Simmons has lost internet connectivity, so we will go on a 5-minute recess while he fixes that.

[Recess.]

[redacted] We'll go back on the record now, 12:26.

BY [redacted]

Q Before I move on, I guess you were talking about Mr. Vallejo. Can you go back to what -- you didn't know who he was is what you were saying?

A Yeah. I didn't -- I didn't know who he was. I seen a -- I seen a picture of him from the -- from the hotel toting -- well, carting in two totes.

Q I guess you don't recall him in the Signal chat, though, with all the QR -- I'll show you some screenshots later, but with all the QRF stuff?

A Well, I didn't know him. A lot of the Signal chats I was just in, you know, unless Stewart told me: Hey, man, get on this chat; they need to know this or that. You know what I mean? Because, hell, he put me in like six or seven chats. And these guys just talk, just talk, just talk, just talk. So --

Q That's a good -- I want to go through -- so were you in the leadership intel sharing chat?

A I don't know. Man, like, he put me in like chats, just chats, new Oath

Keepers, Florida op, OK op. Like, it's insane. Like, if this guy says, "Well, who is this guy," I don't know who he is. Well, they're going to start a new chat, and then they'll put me in that chat. So, like, I got Signal chats with like 22,000 unread messages.

Q Okay. So you -- I don't want to say the answer for you. Describe to me how frequently you would check the Oath Keeper Signal chats.

A If I was on a -- like if it was -- if it was something that was coming up, like -- like the rally in December, like I would check that, you know, a couple times a day to see what was going on. Or, if Stewart was like, "Hey, these guys are talking about this, this or that, can you get on and give us your opinion," I would get on in.

But, like, outside of that, I really didn't, you know, keep up with it a whole lot. Like, I went from looking at it to not even checking it at all.

Q But do you still have any of these Signal chats at all?

A When the FBI took the phone, I still had all of them. You know, when -- when I realized it was like an investigation, I didn't delete any of the chats. So like they're on the phone, you know. And they got the phone, and I'm sure they went through and looked at a lot of them.

But like the main chat that I was in like when -- when me and the special agent opened it up, there was like 24,000 unread messages. And then the conversation right underneath that had another 15,000, and it just went down the list.

Q I'm jumping way ahead, but, after January 6th, do you recall Ms. SoRelle telling people to delete all their chats and everything like that?

A Not to my recollection. Now, I do know that she -- she thought they were going to do like strategic air strikes on people.

Q Who is "they"? I've seen that, like -- and actually, let's just --

A "They" meaning the government.

Q Okay.

A Like, are you -- yeah. So, you know -- you know, sometimes -- like I said, sometimes she'd go left field.

Q We'll get to that later. I have -- I think I have an exhibit. I have an exhibit where Ms. SoRelle mentions the coup is starting now and stuff like that. I just was trying to better understand what she was saying, if you recall.

Well, I'm going to --

[redacted] Can we pull up, [redacted] the indictment, the Caldwell indictment, exhibit 3?

I just want to know if you can help us understand some folks.

And, once you pull up the indictment, [redacted] we can go to page 5. It's exhibit -- we're talking about exhibit 3, page 5.

Okay. And there's a mention of person 19. So can you find that paragraph, [redacted] I think it's the bottom. There it is, right there.

BY [redacted]

Q It says: Person One initially named Person Nineteen and Person Ten to be the co-leaders of the group's operations in D.C. on January 6th.

This is Mr. Don Siekerman, right?

A Well, no. Remember, Siekerman was in charge, and [redacted]. Like, Siekerman was over the whole operation.

Q Right.

A [redacted]. And Stewart asked me to take over the whole operation. Now, I was only supposed to organize the close protection details for speakers, Ali Alexander. And then when Kelly said that they had the politician from Florida, it then became Roger Stone.

Q Okay. And we'll get to that too. But look, this paragraph says: Person One initially named Person Nineteen and Person Ten to be the co-leaders of his group's operation in D.C. on January 6th.

You're Person Ten. Person Nineteen is Don Siekerman, or you're saying it's not Don Siekerman?

A Yeah. Well, I didn't know who Person Nineteen was, but Don was supposed to run the whole operation.

Q Got it.

A And I was only supposed to do the EP stuff. So, if he's saying co-leader of the operation, that's maybe what he was talking about. But when he initially asked me, it was to organize for him the close protection stuff and work with Don Siekerman to get teams together for that kind of stuff.

Q And the reason why we're saying it's Don Siekerman is because the paragraph says when Person Nineteen [redacted], Person One was deemed -- Person One deemed Person Ten to be the sole leader. So --

A Yes.

Q Who is Don Siekerman? We haven't heard that name yet.

A Well, Don was at the first march -- the second march in D.C. He was one of the people that was -- that was with us at that -- at that smaller march. He's an older guy. I think he used to be a police officer. He's retired. He's pretty cool, a pretty mellow old guy. You know, he's -- he's, you know, he's an older guy that's in shape, you know.

Q Where is he?

A I haven't had a clue. Like, I haven't talked to him since January 4th.

Q Did you have his contact information? Is this someone that you would talk

to on the phone?

A Only on Signal.

Q Only on Signal, okay. And he was a guy -- he was close with Rhodes, I'm assuming?

A I don't know how close they were, but Stewart did name him to be in charge for the January operation.

Q Okay.

[redacted] And then can we go to page 10 of this same exhibit, [redacted] and it's the last paragraph of this page.

BY [redacted]

Q So we're talking about the GoToMeeting on November 9th, which we'll touch on a little bit.

Person Three. So it sounds like Watkins, Kelly Meggs, Harrelson, Hackett, Person Three, you and other members were known to have attended this GoToMeeting.

It also mentions -- the indictment also mentions that Jessica Watkins had reached out to Person Three to see if the North Carolina boys were coming to January 6th. And then Caldwell had talked to Person Three on at least one -- about at least one full bus 40-plus of people coming from North Carolina.

Is this Ranger Doug?

A Well, yeah. The North Carolina guy is -- see, here's the thing about it: Going into the January stuff, you know, Doug had kind of excommunicated himself from the group and Stewart did the same. So Doug was trying to start his own thing, and Stewart was talking about suing him because he was still trying to use the Oath Keeper name. And, you know, Doug had been reaching out to the Florida guys, an Ohio chick, and a couple other people, trying to get them to, you know, basically go siren from

Stewart and join him.

So, like, Doug was trying to do his own thing, basically. And Doug told Stewart he was -- he was -- he was leaving the group and he was taking the whole -- all of North Carolina with him.

Q Okay. We understand Person Three, if it's a North Carolina bus coming up, to be Doug Smith?

A I mean Person Three ran North Carolina. And they ended up coming on a bus, but they also said -- well, Doug also said that, you know, they were coming, and they wasn't -- they were not affiliated with national, meaning, you know, they were coming, but they had nothing to do with the Oath Keepers that were going to be there.

Q And that had to do with the falling-out that --

A Happened in November.

Q Which was after this meeting. Okay, that makes sense. Okay.

And on page 14, there's a mention of Person Two. There's a conversation with Watkins and Caldwell. Caldwell says: Not that I am aware. Have been contacted by no one. Typical Person One -- which is, as we know, Stewart Rhodes -- here's the rub: Person Two and I will be in a hotel within striking distance of the city starting on the 4th so we won't even be here.

Who is Person Two?

A I don't know who Person Two was, but, like, that conversation, like, those conversations were like sidebar conversations between them, and then did find out later that, you know, they had been talking to each other since that first rally and, you know, they had been planning on getting together and doing training and all kind of stuff.

So, like, a lot of the stuff that was going on was like outside of my knowledge and some outside of Stewart's knowledge, you know, as -- as stuff started to unfold.

Q But you don't know who this person was that Caldwell might have been working with or having these conversations with outside?

A I don't know.

Q Okay.

[redacted] Can we go down to page 16, [redacted] and it's going to be paragraph 65.

BY [redacted]

Q It looks like there's an individual, Person Nineteen, with Kelly Meggs. It looks like Joshua James, Mark Grods, and Person Nineteen were the four participants in a southeastern leaders op call.

Do you know who this person is, Person Nineteen?

A I don't.

Q All right. Person Twenty, this -- page 20. It looks like Person Twenty traveled with Joshua James and Mark Grods and Ulrich from Alabama and Georgia to D.C.

I'm assuming he's part of like the guys that Joshua James brought that you mentioned earlier. Do you know who this fourth -- or fifth person is -- fourth person?

A I don't. The only person I knew that was with Josh James was the Minuta guy, and I seen the dog guy with him, and then there was another guy. I think the -- I think the Sapper guy was talking to him or, you know, something like that. I know somebody in Josh's group was a combat engineer too. So, you know, it might have been him. I'm not 100 percent sure at all.

Q Okay.

A Like Josh -- Josh -- like I said, Josh came with a group. He said he had been working with these guys, and, you know, they would be competent enough to do the security job. So I went with it.

Q Okay.

[redacted] Thanks, [redacted]

BY [redacted]

Q When did you first become aware of like the January 6th plans?

A The January -- well, it was actually for January 5th and 6th. And it was probably like maybe the 3rd -- 2nd or 3rd, he you know --

Q Second or 3rd of December?

A January.

Q January, okay.

A You know, I learned -- you know, I learned about them going -- I mean, because, hell, I'm not thinking about going to a rally, you know, outside of doing, you know, work or something like that.

So he had hit me up and was like: Hey, man, you think you might be available?

I was like: I don't know, man, maybe.

So then he started talking to me about it. When he asked me to do it, it was like pretty close to the event. And Don was in charge, and he had -- you know, had already had a plan to do the security stuff, and then he ended up not going.

BY [redacted]

Q So I guess the question -- this is like an overarching question. You weren't an Oath Keeper, but, like, I guess help us understand how often you talked to Oath Keepers, how much you understood like their plans.

Would you describe like you knowing a lot about January 6th and the Oath Keepers heading into it?

A No. So like -- like I said, in between -- in between him having me come out in -- him having me come out in July and November, talked to nobody, you know, other

than Greg. I might have had a couple conversations with Landon. But, you know, me and Landon never talked about Oath Keeper stuff, you know what I mean. So, like, you know, Landon's a cool cat, like you know what I mean. He used to be a recruiter and stuff like that. Me and Landon are, you know, friends outside of Oath Keeper stuff.

And then all the stuff from November all the way out, you know, Stewart kind of kept me in the loop because I was out with Kelly. And then when I went home in December, hadn't heard anything, hadn't talked to anybody. You know, to me, it was just, you know, something else that I've done. And then, you know, here comes January rolling around and he hits me up.

Q How did you bill Mr. Rhodes? Would you just like -- would you send him hours? How did that -- or did you just say $200 a day like just period?

A Basically, yeah. Like: Hey, I'll do it for this much. You cover -- cover the rental and, you know, room and board.

And then like -- I know Kelly paid me for my second time out with them. Like the stuff through December, like Kelly paid for that. And then Stewart paid me again in January.

And so, like, you know, I just felt like it was going to be just a job, you know, just Brown and Taylor (ph) job, and, you know, went through Greg, you know, 1099, that. And then, when he called me to do Kelly's stuff, it was like so spur of the moment, you know. I was, like: Hey, look, this is how much I need, you know, cover this, cover that.

So he was like: All right, cool.

And then, when I left and came back, Kelly paid for that second time, and then the third time when I came back, Stewart paid.

Q Did Mr. Rhodes ever not pay you for a job?

A No. No, he never not paid me for a job. Like, he paid me later. And like

going into the January stuff, he gave me some money up front and then, you know, he paid me later, but he wanted me to come back out for Kelly, and him and Kelly was going to pay for it. But Stewart ended up giving me a lump sum of money for the rest of the January stuff and then the stuff that he wanted me to do for Kelly in February.

Q Okay. And this is February of 2021?

A Uh-huh.

Q So this -- is this what the eight grand was for?

A Yes. It was the rest of the payment for the January stuff and then the stuff for Kelly, because he wanted me to stay there for, you know, damn near a month. And I was like: Stewart, you know, you got to cover the rental and then gas and stuff like that. So he just dropped me a lump sum.

Now, some of that money went back to Stewart to pay for his -- his -- some attorney he had when he -- when he felt like he should get an attorney for the group.

Q Okay. And this is after January 6th?

A Uh-huh.

Q I guess, why did you give the money back at that point?

A Well, it was -- it was -- hell, I was leaving. Like, I left. I didn't stay out there the whole time. I think I did a total of like 3 weeks out there with Kelly. I mean, because it was like -- in my opinion, there wasn't a need, like, you know what I mean. It's like, you know -- you know, there wasn't a need.

Like, you know, I go to her law office with her, sit there for a minute, you know, ride her around the city. And we went to quite a few places around Texas. And then like it just kind of like -- there wasn't a need.

Q Right, okay. So there wasn't a need because you weren't perceiving any threats that --

A Yeah. There's no need for me to stay out here, you know what I mean. I can, you know, go to do a real job, you know. I mean, not that I didn't want to get paid to hang out, but, you know, I can be doing real work, and, you know, just there wasn't a need.

Q Going back to January 6th, you found out sometime about January 2nd. Mr. Rhodes is the one that reached out to you. Who else might have been involved in making the plans for -- other than Mr. Siekerman?

A As far as I know, it was just Stewart and Siekerman. And he was like: Well, hey, you know, can you help Don with the security? Can you set up close protection stuff? You know, we got these speakers, and, you know, they're asking for protection.

And so it was a call with the organizers, the Virginia Women for Trump person. Basically, like, it was supposed to be somebody on the call from like each stage that, you know, they were going to be at and stuff like that.

And so like I listened in on the call a little bit. I was, you know, kind of late getting on the call so I caught like the tail end. And, you know, I know -- I don't remember what the lady was, the Virginia Women for Trump, older lady. You know, she had a security guy. He was -- you know, they were on the call. And then I think Ali Alexander dropped in and, you know, one of the Latinos for Trump people.

Q Did any Congressmen or White House folks drop in on the call?

A I doubt it. I don't know. I mean, if it was -- if it was, I don't know who it was.

Q Okay. Going back to this November 9th GoToMeeting, do you remember that, that meeting on November 9th?

A Not really. I mean, when the FBI played it for me, you know, I remembered

some of the audio.

Q Right. So do you recall like the mention of a bloody, bloody Civil War that Rhodes was talking about, Mr. Rhodes?

A So Stewart's like: Hey, man, you know, it's going to -- like, he's talking like, you know -- he was talking about like -- he felt like the left was using people like antifa and BLM to fight their battles for them.

And so, when he's, you know, saying: Hey, well, man, there's going to be blood in the streets. He's talking about like -- he was talking about like fighting with antifa. And, you know, he made mention of a couple people being ready to throw hands with antifa in the streets.

Q Got you. What did you think about this rhetoric of fighting antifa in the street?

A I just listened to it, man. I just listened to it like.

Q What did you think? You said earlier you laughed at Rhodes when he --

A I mean, because -- I mean come on, man, who's going to storm the White House? Like you know what I mean? A bunch of makeshift riot shields and face masks were made. They're going to take over the White House? Come on. Yeah, right.

But like when it came to him talking about fighting antifa in the streets, you know, it's like, you know: Hey look, Stewart, you know, whenever you're doing a security job, like when you're protecting somebody, the primary goal is to get the client off the X.

I'm not going to stand here and fight with antifa if I'm protecting people. Like, my goal is to get this person out of here. And if I can do it and be boring, hey, like I've done my job really well if I don't even have an interaction with these guys.

Q Right.

A And Stewart understood what I was getting at. And he was like: Well,

man, you know, it just might happen, man, you got to be ready.

I was like: I understand, Stewart, and I'll be ready, but that's not my primary concern.

Q So, moving forward to the plans, do you recall the -- you mentioned earlier you didn't read all the Signal chats, but were you tracking if there was going to be a QRF for January 5th and 6th?

A No. So me planning security, me being at the other two rallies, I didn't plan for a QRF because, one, we didn't have enough people; and, two, you wouldn't be able to get to anybody because you're not going to be able to get a vehicle on the street. So, like, we didn't have a QRF.

Q Okay. And did you ever express this to Mr. Rhodes, like --

A Yeah. Everybody who was involved knew we don't have a QRF, because there's no need. In fact, I told everybody not to show up wearing BDUs. Like hey, look, this is not a military operation. Don't show up in camo. And Stewart's like: Well, a lot of their plate carriers are camo, and that's all they got.

I was like: Well, that's cool, but you don't need to be looking like a National Guard person or, you know, some -- somebody who's going to a weekend militia meeting or something like that. Like, you know, this is not a military operation. So like there's no need for anybody to show up wearing a battle dress uniform. And, you know, some people still showed up wearing battle dress.

Q Who did you specifically tell that people shouldn't be wearing BDUs? Was it Mr. Rhodes, or did you tell individual members?

A No, it was everybody who was on that conversation. Like, we had a -- we had a meeting with everybody who was supposed to do security, everybody who was coming, like the Florida people, Josh James, you know, a couple people from New York

that didn't show up, some South Carolina people that didn't show up. You know, everybody who said they could help with security was all on this meeting. And I told everybody: This is not a military operation, nobody should be showing up in BDUs.

And then like, when I was telling them there's no need for a QRF because, like, you're not going to be able to get to people on the street. So, like, if you can, like park your car close to where like you can get in your car and extract people for medical reasons. And so like, if you run a QRF, it's only for medical stuff.

But like -- like I said, we didn't end up having enough people to do the security. So, you know, going into the 5th, I was like: Yo, there is no QRF. We don't have enough people.

Q We'll do a little more about the QRF. I do want to ask when was this meeting that you --

A I think it was on the -- it was either on the 3rd or the 4th. It was a phone call and it was later in the day. Like, this was -- this was when -- well, this was after Don said he wasn't going. So it had to be like the 3rd or the 4th.

Q Okay.

A Because I left out the -- like, I left out the evening of the 4th. I got there like the night of the 4th.

Q And what was the response? When you said no BDUs and no QRF, what was the response from the folks on the call?

A Nobody said anything. Like, Stewart said, some of their -- you know, some of their gear is -- is camouflage and, you know, tri, you know, colored stuff. Well, that's fine, but there's no reason for you to have BDUs on.

Q What do you typically wear for security jobs?

A Depending on a job. Like, if you -- you want to blend in. So, like, you're

not going -- you're not going to wear tactical anything. You know, some jeans, you know, some shoes that you can walk in and move around in, you know, some clothes to be loose.

You know, you might have -- like, in D.C., you can't carry firearms. So you got no firearms, right? And then, like, you can't carry, you know, big knives. So you got no knives. Then you can't use pepper spray if it's not OC so, like, you know what I mean? So there's like a lot of stuff you can't have in D.C.

So now you're really dependent on your ability to get your client off the X. Now, when you got members in your group that's like H.R. 218, they might have handguns, but I can't account for that.

Q Right. How did you become aware of these laws in D.C.? Was it something you researched on your own as a professional or something that people made you aware of?

A Both. Like, you always look at the laws like where you're going. And then you got people who stay there, like: Well, hey, look, you know, what's the -- you know, what's the law on this? What's the law on that?

Because, like, you know, for a while I couldn't find the law on like carrying a -- carrying a baton. Well, you know, D.C., you can't carry a baton and use it for offensive purposes, you know. So it was like, you know, like, these are things you got to be aware of.

Well, the second time we was in D.C., Siekerman called the police department, talked to them, and got a whole list of dos and don'ts.

Q Okay. Did Siekerman have a relationship with the D.C. Metropolitan Police, or he just cold-called them and asked these questions?

A I think he just cold-called them.

Q Okay. Do you recall on December 14th Mr. Rhodes publishing a letter on the Oath Keepers' website advocating for the use of force to stop the lawful transfer of Presidential power?

A I don't, but I will say this: I don't go to the website.

Q Okay. Do you recall him talking about this at all?

A I don't recall him talking about it. Now, he did say that, you know, if -- if need be, he'd be willing to fight with the left in the streets if they tried to protest against the -- if they tried to protest against like a -- like a recount and stuff like that, because there was like protests popping up for recounts and people was getting attacked.

So he's like: Hey, man, you know, I'd be -- I'd want Oath Keepers to stand at those polling locations and be willing to fight with antifa and rioters that show up to try to stop a reelection, stuff like that. He never came out and said: Hey, man, if this election is stolen, I want you to go and shoot people. Like, I never heard him say anything like that.

Q Okay. But it was to protect -- if there was going to be a hypothetical recount, he was willing to fight, in his words, antifa and leftist groups that came to --

A Stop a recount or stop a reelection.

Q Got it. Do you recall President Trump's tweet about the January 6th rally on December 19th?

A No. I don't -- no.

Q I figured. I have to ask the question still.

On a December 23rd letter from Mr. Rhodes, he talked about tens of thousands of patriot Americans, both veterans and nonveterans, will already be in Washington, D.C., and many of us will have our mission-critical gear stowed nearby just outside the city.

Do you recall this letter, or do you recall Mr. Rhodes saying stuff like this?

A I don't recall the letter, but, you know, it's Stewart. You know, Stewart talked about stuff like that. Well, hey, man, you know, if it goes kinetic, you always want to be ready. So, you know, he's like: I'm not going to wear plate carriers, but, you know, I'm going to keep it in the car. And, actually, he did keep his plate carrier in the car and -- I mean, because he walked around without one on.

Q So he was preparing for -- I'm just making sure it's clear -- fights with antifa or the left, that's what he was preparing for?

A Right, he was. And he -- he thought that, you know, those guys would show up armed. Like, the first -- like the Million MAGA March or whatever they called it, he felt like, you know, they were going to be able to storm the White House and the cops wasn't going to do anything, because, you know, all the Governors are telling police officers don't do anything about the rioters. They're letting them tear up cities and letting them tear up national historic buildings and stuff like that. And, you know, like: Oh, man, these guys aren't going to give a damn about what the D.C. laws says. They're going to come in there with guns, and it's going to get kinetic.

I was like: Okay, Stewart, you know, I still don't think they're going to storm the White House, but you know what I mean. And that's -- that's where his mind was with that stuff.

Q Do you recall any Oath Keepers saying things like "we need to" -- and this is a quote -- "we need to make those Senators feel very uncomfortable with all of us being a few hundred feet away," in regards to January 6th?

A I heard that after it was said.

Q After it was said, like in December-January or after January 6th?

A After January 6th.

Q Okay. But you didn't hear anything like that as it was going on?

A I didn't hear anything like that as it was going on.

Q What's your reaction to it now?

A Kind of -- it's kind of F'ed up. It's kind of asinine for you to say something like that, given, you know, what happened at the Capitol, you know what I mean. Like, you know, there's no way -- say, like a group of people storm the Capitol and you're with said group and then you make comments like that. So, like, you know, what were your true intentions, you know what I mean?

Q I know I'm jumping ahead a little bit. So is that kind of how you feel overall, looking back, about the day when you hear quotes like this of people who stormed the Capitol that you were with, it makes you kind of question?

A Like I said, like -- like, some people just walked into the Capitol, you know what I mean, and some people were just there. But there were people who actually felt like: Hey, let's go attack Congress.

You know what I mean?

And so, you know, I'm not saying that everybody's innocent and everybody shouldn't be charged, but, you know, some people should really be charged and some people just, hey, look, you know, you shouldn't have walked in here. You know what I mean? Because, like, I was standing on the -- I was standing on the grounds looking at everything going like: Jesus Christ, this is insane, this is insane.

And so like when you -- when you're looking at people -- because like -- you know, like the guy who snatched the pepper ball gun from the cops and then took the shield and you know what I mean? And like these guys who ripped all the stuff off the police officer and tossed him around in the crowd. Like, you know -- like, you know, the mob mentality takes over, but, like, some people really wanted to do harm, you know what I mean? And it comes with those huge, huge crowds.

Q Right.

A You never know what like somebody's true intentions are. So like if somebody goes in the Capitol and they're feeling like: Well, hey, let's -- let's see how far we can get into scaring Congress or let's see how far we can get into attacking Congress Members; those guys need to be prosecuted.

Q Going back to the 6th, was there any part of the plan that dealt with the rally at the Ellipse?

A Well, we only had people in the Ellipse. Like Roger Stone was supposed to go to the Ellipse. He didn't end up getting in. He was ready to go, because they wasn't treating him like a VIP. Now, and that's according to, you know, what Josh told me when he called me. He was like: Well, hey, man, Roger Stone's out. Like, he's upset they're not treating him like he's a VIP. He feels like F this stuff, like, you know, we're out of here. And so like he took him back to the hotel.

And then like Kelly Meggs and his guys were there with the, you know, politicians, whoever they were. But, you know, they weren't allowed in because they had on plate carriers. And then, you know, Jeff was there with Ali Alexander, and he was in there. But I'm not sure if the Florida guys actually got in the Ellipse.

But, in terms of like the stuff at the Ellipse, it was only the people who were going and the people who they were going with.

Q Do you recall any coordination before January 6th or discussions with the Proud Boys?

A None.

Q Are you aware of Kelly Meggs ever meeting with Enrique Tarrio in Florida to discuss January 6th?

A I'm not.

Q Would that surprise you?

A It would.

Q Why would it surprise you?

A I mean, well, given what Stewart said about, you know, the Proud Boys group and, you know, Kelly being one of the State coordinators, it's kind of like, you know, like: What are you on? Like, you know, are you already going behind this man's back or, like, you know, what's happening, you know what I mean?

Because like if we're all in a group and we're all on the same page, let's all be on the same page, you know what I mean? So if I say, hey, we're not going to associate with said group because of their ties to White nationalism or, you know, whatever, why then would you be one of my leaders and you go meet with this group to plan anything?

Q Right. Would it surprise you then -- I think I saw a quote of you in an article, but -- and I think you were surprised, but does it surprise you then to hear about Enrique Tarrio and Stewart Rhodes being in a garage together the night of January 5th?

A Yeah, it did. And I was kind of blind-sided by that. Like, you know, I didn't -- and still can't understand why like, you know -- I don't -- I don't even know like, you know what I'm saying? I'm kind of like, hey, you know, I'm kind of trying to figure out what they were talking about.

Q And he never mentioned this to you, Mr. Rhodes never mentioned it to you, and Ms. SoRelle never mentioned meeting with Enrique Tarrio in the garage on January 5th, the night of January 5th?

A They did not. And here's the thing. I talked to Kellye last week and I asked her about it. And she's like: Oh, you know, yeah, he met and it was -- you know, she tried to give me an explanation. But, no, I didn't know about it when it happened and he didn't say anything to me.

Q I guess now like -- and I don't want to assume anything, but like I'm hearing what you're saying. You find out. You talk to Ms. SoRelle. She gives an explanation.

I guess what are your thoughts about the fact that the meeting happened and the fact you didn't even know about it when you were in D.C. on January 5th?

A You know, it's -- I mean, it's a conversation. I mean, you know, I'll ask Stewart about it, you know what I mean? And, you know, I'll ask Stewart about it. But it's kind of like: Damn, bro, you couldn't fill me in, especially with all the stuff going on.

Like, you know what I mean, don't let me be blind-sided by something, because, you know, at the end of the day, like, you know, I'm -- I'm not a member of the Oath Keepers and so like, you know, I'm kind of out here.

Q Right. And I guess the reason why I'm asking these questions, right, is we have these quotes of making people feel uncomfortable, the Senators feel uncomfortable. We have like this meeting on the 5th. So I'm trying to understand how plugged in you were to the Oath Keepers, in retrospect.

A You said I got quotes to make Senators uncomfortable?

Q No. I'm saying we just talked about the quotes.

A Oh, oh, oh, oh.

Q So I'm not putting words in your mouth. I'm talking about the quotes that we just went over of Oath Keepers saying: We're going to make the Senators feel uncomfortable with being a couple hundred feet away.

And then you have like this January 5th meeting with Enrique Tarrio.

I'm just trying to understand like what you're thinking now after the fact about how plugged in you might have actually been to the whole operation.

A You know, outside of the operation, you know, I can't speak on anything outside of the operation or the stuff that I, you know, had any -- any -- any hand in. So I

can't really speak on that. But, again, like -- like when all this stuff happened, you know, you could have said something, like you know what I mean?

So like don't let me be blind-sided by like, you know, hey, well, yeah, like you asking me about it now. Well, yeah, well, he told me about it and this is what he said happened. Like, I don't -- I don't know what to tell you, because I found out a couple days ago, you know what I'm saying? And so I can't really ask Kellye about it, because I don't know if she's going to be left field or, you know, I don't know -- like, you never know when you talk to Kellye about some stuff. So --

Q And just to make it clear before we move onto this QRF, I want you just to say it again. And I don't know if you were explicitly asked this question. We used the word "operation." What was the operation for January 5th and 6th, from your viewpoint?

A To provide security for speakers at stages, escort them to their vehicles, make sure nobody, you know -- make sure nobody did anything in the crowd to, you know, that would give the rally or anything like a bad name, because they were worried about actors being in the crowd, you know what I mean? Like antifa types or, you know, people who wasn't with, you know, the rally, basically. Like anybody who wasn't with the rally, they'd come and, you know, wear Trump supporter hats and start shit in the crowd.

And so like, you know, watch the crowd, make sure none of that's going on. But the primary responsibility was to make sure the speakers made it to their cars safely and that the people leaving the rally when it was over made it to their car without being attacked.

Q And you all were going to be at the Capitol Grounds because you were going to be at lot seven, because that's where the event was being held?

A See, stage seven was on the other side of the Capitol. There was something that was supposed to be on the Capitol that Ali Alexander was supposed to have going on, but, you know, looking back at it, like, it didn't appear that he had anything planned on the night, because like nobody ever seen any kind of permits or anything for a stage on the Capitol Grounds on the day of the 6th.

So, outside of the stuff that the Virginia Women for Trump had on the 5th in front of the courthouse, the events that was on the yard of the courthouse on the 5th, and then the stages that were set up on the 6th, you know, we didn't have any -- any other plans to be around any other places on the 5th and 6th after that, with the exception of the protection details around D.C. for Alex -- I mean, not Alex, Ali Alexander, Roger Stone, and whoever those guys were the Florida team had.

Q Got it. All right.

So let's hit this QRF hotel issue. You've kind of described what the purpose was going to be, but when were you tracking there was going to be a QRF for January 6th?

A There was no QRF for January 6th. We didn't have enough people. So any QRF was not a part of what we had going on.

Q When you say "we," who's "we"?

A The operation.

Q Okay.

A So the stuff that Stewart brought me there for, we didn't have a QRF.

Q But are you saying Mr. Rhodes would have been tracking the QRF, because we have messages of --

A Well, that's what I'm saying. Outside of what I'm -- like, you know, I can't -- I can't speak on what I don't know.

Q Yeah. So you weren't tracking the QRF is what you're saying?

A Right. We didn't have enough people. We didn't have enough people for the stages. So how in the hell -- like, who has a QRF?

Q So you weren't really familiar with folks staying in the Comfort Inn Ballston? And I'm talking about beforehand, before the fact, the Comfort Inn Ballston, with the weapons being stowed there?

A See, now, here's the thing: Josh and his group stayed inside of D.C. for Roger Stone or with Roger Stone. And I don't know -- like, I'm not -- like, I don't remember what hotel they stayed in, and I don't know if some of those guys had guns.

Now, I do know like Stewart said he had other members that stayed in D.C., and they would probably have their guns. And, you know, he made mention of them handing their guns off to somebody who was staying outside of D.C. And I don't know if that happened. But I didn't plan for a QRF because we didn't have enough people. We didn't have enough people to cover every stage.

Q I guess why was -- and I think I know the answer to this as well. Why were folks bringing guns up here anyway, to be stowed in Virginia?

A You know, why do people bring guns anywhere? You know -- you know it's against the law. Some people still -- still bring a gun, you know what I mean? I mean -- and you got the -- like Doug, you know, Doug will tell you, I'm not going anywhere without a gun. And he was so uncomfortable being in D.C. without his gun, he pulled everybody out when he left, you know what I mean? So you got those people.

Q And when I asked -- I was going to ask you what were they expecting where they needed to bring a gun? Was it the antifa threat you've been talking about?

A I mean, some guys I'm sure, you know what I mean. Like, here's a guy who was a Ranger and he doesn't want to go physical with anybody, but he's older too. And so when you got -- when you got somebody in that mindset, like an older person or

something like that, like, you know, I got my gun. I can't carry it, but I got it in my room.

Q Yeah.

A You know. So like -- because I would tell people: Hey, look, you know, you can't have guns in D.C. So like if you bring your gun, leave it at the hotel room. But everybody who I was talking to was staying in the Virginia hotel.

Q And were you aware that they were staying in this Virginia hotel?

A Yeah. Josh, Landon -- well, I mean -- because Josh had a room there. He just didn't stay there. So Josh had a room there. Landon, Joe. Stewart -- Stewart got quite a few rooms there, and there was some people there.

And, hell, I didn't bring my gun into D.C. Joe -- like, we -- like, no guns were brought into D.C. by us. And so like even -- even when I was doing the security briefing, like, look, you know what I mean. Everybody knows you can't have a firearm in D.C. And, hell, I told them not to even bring mace. If you're not sure what kind of pepper spray to bring, don't bring it at all, because like what I don't want is people going to jail.

Q And this is -- when you say stayed in Virginia with you all, this is the Hilton Garden Inn Vienna?

A Yes.

Q Okay.

A So, like I said, Josh had a room. He didn't stay there. He stayed in the city because he had Roger Stone.

Q Did he stay at the Mayflower, do you know?

A I don't remember.

Q You don't remember, okay.

We also understand that the QRF -- and you may not know this, but it was supposed to be run by the law enforcement Oath Keepers. Were you tracking that at

all?

A No. So, like after everything was over and I was looking at it, like, it seemed like the North Carolina guys were the bulk of the so-called QRF. Now, I might be wrong, but, you know, the stuff that I was looking at, because like the guns on the bolt and stuff like that, like, you know, those were all plans that like people -- the North Carolina cats were talking about.

Q But I guess -- I thought Ranger Doug and them weren't -- I guess I didn't think they were on good terms with Mr. Rhodes at that point. So what North Carolina guys were manning the QRF?

A So it's -- it's -- it's another guy that Stewart was going to make the leader of the North Carolina guys. And so he's telling us all the conversations that Doug's having with the other North Carolina guys. And these were plans that they were laying out.

So he's telling Stewart: Hey, this is what they're going to do, or this is what they're planning to do. That's how we knew that they were coming on the bus. That's how we knew that they were leaving from the military base. We got all that from -- I think his name is Steve.

Q Steve Kwiatkowski, is that it?

A I don't know his last name.

Q Okay, Steve. So Steve and Ranger Doug were still organizing the bus. Did they leave from Bragg? Which --

A Steve is still cool with Doug, and Steve is still cool with Stewart. Now, Steve's part of the North Carolina guys. Doug runs the North Carolina guys. Doug wants to go solo, and Steve's still with Stewart. So Doug -- I mean, Stewart is going to make Steve in charge of North Carolina, but he's going to sue Doug or some crazy stuff like that or something like that. He's going to sue him and not use his name or

some -- some stuff he was talking about. But -- so like, you know -- so Steve would, you know, tell Stewart what was going on.

Q Got you. And it was the North Carolina guys that were mostly manning the QRF, from what you understood?

A Well, they had their own thing going on.

Q Got it. What about radios?

[redacted] Can you pull up exhibit 51, [redacted]

BY [redacted]

Q I believe this is a message, one of the few messages we had of you in the Signal discussing radios.

You can scroll down to what Whiplash says, right here.

Just help us understand what communications you all were planning to use.

A So this is where they were trying to figure out -- because like the -- the AP, the 1AP guys had radios, Motorola radios. And when we were with them, the radios, you know, there was no issues, no problems. But, like I said, like, you know, they were -- like, they're a different ball game. Like, those guys got their shit together.

Now, with us, you know, Stewart doesn't have these radios. And, you know, everybody in the group's wanting to use like Zello and Voxer and stuff like that. And, like, these were all ideas that people were trying to do the previous two marches.

And so what I'm telling them is, like: Hey, look, you know, like the FRS radios and like all these preppers we're having, like the little cheap Chinese radios, you know what I mean, like the analog radios, like guys had them, they just didn't work.

[1:11 p.m.]

BY [redacted]

Q Got it.

A And so I'm like, well, hey, look, you know, they didn't work the first rally, the second -- you know, they didn't work these other rallies. You know, none of the online communications worked the second rallies. And so we only had success out of using the Motorola radios.

Q I saw mentions of Ms. Watkins talking about Baofeng radios. Did you all end up using radios on January 6th?

A No.

Q Did you see Oath Keepers with radios on January 6th?

A Not -- like, so none of our -- like, our primary mode of communication was text and then phone call and then Signal. So, like, the FRS radios -- the Baofengs are the FRS radios.

Q Yep.

A Like, they didn't work when --

Q Okay.

A -- there was, like, a bunch of people grouped into there. So it was like, there's no need to have it if it doesn't work.

Q Right. Okay.

A And, like, all of these, like, militia groups, they use these radios, these prepper groups use these radios. They're analog. Like, you know, if you set up a repeater, it's going to work this far and that far.

Like, nobody has time to do that on a single operation. You know, this is a

security operation, it'll probably last you 3 days. You're not gonna go around and set up repeaters to be able to use a radio, one. Two, who the hell is going to let you set up a repeater and stay there with it that's in law enforcement in D.C.? Like, you know, you look like you're planting a terrorist device. You know what I mean?

So, like, it's not going to happen. It's unrealistic.

Q Got it. Okay.

[redacted] Thank you, [redacted] We can take that down.

BY [redacted]

Q And you mentioned a meeting I think on, like, January 3rd or 4th to discuss January 6th. How many meetings did you all have planning for January 6th -- 5th and 6th?

A I know I was in, like, at least two -- three.

And, hell, Stewart would have meetings to talk about breakfast. He just -- man, we're gonna have a meeting about this, we're gonna have a meeting about that, we're gonna have a meeting about this.

So I don't know how many meetings they had, but I know I was in, like, two or three of them.

Q And this was in the January 2nd timeframe when you were in these meetings?

A Yeah. After -- you know, after I decided to go.

Q Do you recall a December 31st leadership-only conference call? I believe the indictment, Caldwell indictment, says you were on it with Watkins, Kelly Meggs, Joshua James, Roberto Minuta, Hackett, Ulrich, Groves, Grods, Rhodes. It says "Person Three" and then you.

Do you recall this meeting?

A I don't recall it. I mean, you know, it's probably one of the phone calls that they were having, but I don't recall it. Like I said, like, I don't remember talking to anybody after my second spiel out with Kellye. So, like, going into Christmas and stuff like that, I don't remember talking to anybody after that.

Q Okay. And when you were on these calls, how active were you? I guess, how active of a participant were you during these calls?

A It varied. Just depends on a call, like, what the situation -- like, what the conversation was about. Like, you know, some of those sidebar conversations I didn't really get into. You know, a lot of the conspiracy stuff, you know, it's not -- it wasn't really my cup of tea. But, like, some of the more prevalent issues -- like, you know, we were talking about, well, hey, this is gonna happen or that gonna happen. You know what I mean?

And so, like, Stewart would have calls about just different stuff, and, you know, I'd sit there and listen to it, but -- some of those calls were about security, and some of those calls were just calls.

Q So when you say a sidebar conversation, were these more like the political-type conversations?

A Yes.

Q Okay. And, like, I'm assuming, like, Insurrection Act-type stuff?

A Yeah. Getting closer to January, yeah, like, you know, it was more about the Insurrection Act. And I had never heard of it, so, you know, I asked him what it was, and he told me what it was.

And, you know, he had a couple conversations about it. Said he was going to write Trump a letter telling him he should invoke the Insurrection Act. And, you know, Stewart wasn't quiet about calling Trump a fucking idiot. Like, I told him, you know,

Stewart, if you send him a letter calling him a fucking idiot, he's probably not gonna invoke the Insurrection Act.

Q Right.

Okay. And then some of the stuff, you said, "like this or that." What threats, I guess, did you actually participate in talking about? The antifa threat?

A Yeah, the antifa threat. You know, like -- so obviously, like, you know, we're not gonna attack anybody. You know, we're not ever gonna go offensive. And, you know, if, like, you're outnumbered -- like, it was a conversation where somebody had asked, well, what if you're outnumbered and stuff like that? Well, you know, leave.

Q Do you recall any discussions about delaying the vote on January 6th or going in the Capitol, anything like that?

A No.

Q Okay.

A Like, nobody ever talked -- you know, not any conversations I was a part of -- nobody ever talked about planning to run in the Capitol or storm the Capitol or, you know, do anything at the Capitol.

Q Got it.

Did you have to text -- or did you text Mr. Roger Stone on January 3rd, the evening of January 3rd? Do you remember that?

A I do re- -- you know what? I do remember reaching out to --

Q Was it Ms. Davis, Kristin Davis? Or was it Roger Stone?

A It was somebody who was affiliated with -- I don't know if it was Roger Stone. I know I reached out to the Virginia Women for -- the Virginia Ladies for Trump, the Virginia Ladies for Trump. I don't remember what her name was.

Q Virginia Lessard? Oh, no, no. Virginia Ladies for Trump. Okay.

But you recall vaguely, it sounds like, texting or reaching out to Mr. Stone or someone with Mr. Stone?

A Probably.

Q What was it about?

A Just pickup loca- -- I think it was, like, you know, where was he going to be, pickup location.

But I ended up -- because I reached out to -- I reached out to somebody. And then I ended up basically handing them over to Josh so they could talk directly.

Q Okay. So Josh James was responsible for all Roger Stone security on January --

A Yeah. But, like I said, I want to say it was about, like, pickup place or what time he was flying in or something like -- something logistical. And I ended up just, you know, handing him over to Josh so they could talk directly.

Q Got it.

A And then everything that I got about Roger Stone and his movements I ended up getting from Josh.

Q Got it. So that explains all the phone calls from Josh?

A Uh-huh.

Q Got it.

A Now, too, remember, the signal there was not good, sketchy at best. And so, like, some of those calls were you call, the call wouldn't go through, so you call back. It'd ring and stop, and then you call back. And then you send a text; it won't go through. Then it'll go through, and you're sending another text. And, you know, it was a bunch of that stuff going on.

Q So moving forward, I guess, to -- you mentioned you came in on January 4th.

Is that when you got into the city, to D.C.?

A Uh-huh. No, it was into -- I drove into Virginia.

Q Okay. When did you drive -- walk us through how you got to Virginia.

A I drove.

Q You drove on what day, January 3rd or the 4th?

A I drove on the 4th and started on the 5th.

Q Okay. And you stayed at the Hilton Garden Inn?

A Uh-huh.

Q And -- oh, you have to say "yes."

A Yes.

Q And you said there was a number of Oath Keepers staying in the Hilton Garden Inn with you all, right?

A He got a number of rooms for Oath Keepers. Like, so a lot of people didn't show up on the 4th. Some people showed up on the 5th he had rooms for. Some people didn't show up at all. Like, some people showed up and didn't, like -- you know, we didn't know they were there until the 6th.

Q How did that make you feel? Like, you thought people were going to come and they didn't show up. Or, like, what were you thinking at this time?

A Well, by this time -- you know, this is, like, my third one for the Oath Keepers straight. So it was just, for me, it was like, eh, typical.

Q Got it.

A You know, it's a --

Q So what --

A -- volunteer group. You know, a lot of people say they're going to come, don't come. It happened in Louisville. It happened again in Georgia, where, you know,

he puts out a call to action, all these people say they're going to come, only a fraction of them show up.

Q Why do you think some of these folks weren't showing up, if you had to speculate?

A I don't know, man. Some people probably overcommit. I don't know. You know, could be any number of reasons. I mean, it's a volunteer group, so, you know, they probably mean well. And some people probably never intended on showing up anyway.

Q And what hotels were you aware of, if you remember any, that other Oath Keepers were staying at other than the Hilton Garden Inn?

A I know it was guys staying -- whatever hotel Roger Stone was in, they had guys staying there. And then I think Minuta stayed in the hotel -- somebody stayed in the hotel that was right next to BLM Plaza.

Q Okay. And was there a reason for that? Did they do it purposefully or just --

A Nope. Just blind luck.

Q Blind luck. And Mr. Rhodes paid for the rooms in the Hilton Garden Inn?

A No, he paid for my room -- like, he paid for all the rooms at the Hilton Garden Inn. Like, he was anticipating more people. So he ended up, you know, reserving all these rooms for people. And, I mean, because he didn't want to -- I guess he didn't want to have people go back to Caldwell's farm.

Q Why not?

A You know, they kind of bumped heads about the way stuff went in November.

Q Oh, when -- okay. With the antifa situation and --

A Well, just, you know, the guy made him, like, 2 hours late.

Q Yeah.

And what gear did you personally bring to prepare for this job on January 5th and 6th?

A I bought a can of mace and a baton --

Q Right. To be used --

A -- and a Taser.

Q -- defensively, right?

A Right. And a Taser. But, see, I didn't end up taking the baton. I didn't end up bringing the mace. All I had on me was a Taser.

Q I guess, why didn't you bring the baton and everything?

A It just didn't fit what I had on. Like, I didn't want to -- I didn't want anything to protrude.

Q Okay. And the Taser you just had? That was, like, your only line of defense, was the Taser?

A That was it.

Q Okay.

A The Taser and fire and ice.

Q So walk us through the 5th. And you talked about this a little bit.

First, before we get into it, were you aware of a command post the Oath Keepers had for January 5th and 6th?

A Well, no, it was a rally point on the 6th for people to meet. Because, remember, everybody didn't show up at the same time. Some people couldn't get there till the morning of the 6th. Some people couldn't get there till the afternoon of 5th. And so they wanted to set up a rally point where members could meet and coordinate

with helping with the security.

Q And what was that rally point?

A It was behind, like -- and here's where me and the FBI were going back and forth. It was behind -- like, I would say, behind the Capitol there's, like, a statue in, like, a roundabout.

Q Was it the Peace Monument?

A I don't know what it's called. But it's a statue, it's behind the Capitol, it's a roundabout, it sits in front of the little makeshift pond.

Q Okay. That's a good description. That works for us.

So walk us through your day on the 5th.

A So, on the 5th, I left out in the morning, parked at the Jefferson Monument, walked into the downtown. And I met with the -- well, I walked to the stage at the courthouse and stood there and was looking at what was going on. I talked to the Virginia Women for Trump lady and her security guy. And that's, you know, where I was at.

And then I walked over to the stage that was on the U.S. Capitol front yard, and --

Q I am sorry for doing this. I want to go back to this rally point. Was it -- you said it was at a roundabout on the back side of the Capitol. Was it, like, a Jefferson statue or a Lincoln statue? Do you know?

A I think it was Jefferson.

Q Okay.

A But it's definitely a statue, like --

Q Was it near the Court side of the Capitol or --

A So remember in January where they were doing construction for where the inauguration was going to be?

Q Yes.

A If you're standing at that statue, you can look right at that construction.

Q Okay.

A So I don't know -- like I said, I don't know if that's the front or the back. I call it the back, but the FBI was calling it the front.

[redacted] If some of my colleagues who know the Capitol Building better than I do have any followup to that, please jump in now.

[redacted] Sure.

Was this potentially a Grant statue? Was it by the water, the reflecting pool?

The Witness. Yeah, it was by the water.

[redacted] Okay. I think that makes sense. Thank you.

BY [redacted]

Q All right. So that was the rally point. Got it. Okay.

Walk us through the protection for Mr. Roger Stone. Was that on the 5th and the 6th?

A Yes. Josh and his guys picked up Roger Stone from the airport, and they, you know, basically stayed with him. They were able to get two golf carts from somewhere to drive him around downtown. And, you know, they just moved around with Roger Stone.

Q And you don't know where they got the golf carts from?

A I don't have a clue. He said the guy from the hotel had -- so some kind of way, the guy from the hotel gave him these golf carts. And he kept calling it "Grand Theft Golf Cart" or something like that.

Q Okay.

And what were the plans for Mr. Stone for the 5th? Like, you said Mr. James was

filling you in on the movements. What were his movements for January 5th?

A Oh, he picked him up. They went to a hotel. And then, from the hotel, they drove around a couple spots around downtown.

Then, on the night of the 5th, there was some, like, some huge rally, and he spoke at that rally. And then they took him back to the hotel. And, you know, that was it.

Then, on the 6th, they were going to the Ellipse, and they didn't let him in the Ellipse. So he went back to his hotel and then to the airport.

Q So let's go back to the 5th. So what hotel -- or what airport did they pick him up from? Was it Reagan?

A Yeah. Right in D.C.

Q Okay. And then they drove around a couple spots. Do you know what spots they drove around to in the city before the night at Freedom Plaza?

A They were on the golf carts. I think they were driving around, like, the -- I think they drove around Freedom Plaza. They went up -- I think he said they went up to -- what's the street that looks at the Capitol, that main street? He said they drove up the main street.

Q Okay.

A Like, when you're driving, it's like a -- what hotel is that? Is that the Trump Tower? I think you drive past the Trump Tower, and you're going up the street. You got the -- I think the Native American museum's on the other side.

Q Yeah.

A It's the same street Alex Jones walked up during that other rally.

Q Did they have any -- did you go to any meetings or anything that day that you recall?

A With Roger Stone?

Q Yeah.

A No, I didn't.

Q Do you recall Mr. James -- so you were with Mr. Stone all on the 5th. Is that right?

A I was at that stage, in between those two stages, all day on the 5th. When I left -- like, that's the only thing I did on the 5th until that huge, like, little rally that they had the night of the 5th.

Q What two stages were you at? The ones at the Supreme Court?

A Yeah. It was the courthouse, and then it was a stage directly in front of it, in the yard of the Capitol.

Q And this was what Mr. Rhodes coordinated for you to -- this is, like, event security you did, basically, for January 5th then?

A Yep, for the Oath Keepers. You know, like, the Oath Keepers were supposed to do security for both of those stages. And we were supposed to have people, but, like I said, nobody showed up. So, like, I ended up being there. And then, like, the Florida crew came midday, and they, you know, stayed at the stage on the courthouse --

Q Okay.

A -- I mean, on the Capitol. My bad. They stayed at the stage on the Capitol.

Q So, going back to Mr. Stone, you don't recall hearing about him going to any meetings, like, at the White House or anything?

A No. I know they met somebody at his hotel, and they were sitting in the lobby waiting on him.

Q Do you know who they met at the hotel?

A I don't.

Q Okay.

A Because when I went -- I actually went over there to check on them at the hotel. And, you know, the hotel was putting people out because of COVID and stuff like that, and so we ended up sitting outside talking.

And then, like, that event was getting ready to start. So they, you know, kind of came out of there, and, you know, that -- I don't even know what that rally was called, but it was a bunch of people. Roger Stone talked. Ali Alexander talked.

Q This is the night one at Freedom Plaza?

A Yep.

Q Yeah. Okay.

I guess, did you observe any threats or anything like that on January 5th?

A Threats from?

Q Just while you were providing security, did you have to --

A No. No. Everything was okay. Like, nothing out the way. Everything was pretty easy until the 6th.

Q What was the discussion like -- I guess on the 5th, what were people talking about for the 6th? Were people talking about plans for it?

A No. No. You know, like I said, everything was pretty normal.

Like, after that event was over, we took this lady named Marcia back to her hotel. And it was the -- the Veterans for Trump people were there. And so, like, we, you know, stayed there for a while talking to them. Like, Stewart was there. He was, you know, talking to the guy who runs the Veterans for Trump group. And there was a couple Latinos for Trump there. Like, everything was cool. Everything was just on the up and up.

And I went back --

Q Talking about --

A -- walked back to the Jefferson Memorial -- huh?

Q What were they talking about with Rhodes and the Vets for Trump and Latinos for Trump? What was the discussion?

A Just stuff, you know, just plain, run-of-the-mill stuff. Like, you know, hey, man, how long you been here? Hey, well, what do you guys got going on? They were talking about, like, other events that they had been in and stuff like that.

Like, I mean -- like, it wasn't -- like, nobody was talking about the election. Nobody was talking about, you know, running in the Capitol. They were just having just plain old conversations. Like, hey, man, after this is over, you guys want to get something to eat? You know what I mean?

Like, they wanted to go to -- it's some bar that a bunch of Republicans hang out at in downtown D.C. They were talking about walking over there. You know what I mean? The guy was, you know, giving everybody beers. You know, it was one of them kind of situations.

And then the hotel manager came and made everybody leave because they were being too loud in the lobby.

Q So how would you describe the environment on the 5th? Was it festive? Did it seem, like, tense? It sounds like it wasn't that tense.

A No, it wasn't tense at all. It was more festive than tense. Like, you know, a bunch of old vets get together; there's alcohol involved, beers. You know what I mean? People talking shit. It was cool. It was all right. You know what I mean?

Q Did the Oath Keepers have any planning meetings on the night of the 5th for the 6th?

A Any planned meetings?

Q Any planning meetings for the 6th on the evening of the 5th?

A No. So the only meeting we were supposed to have was, when everybody got there, we were all supposed to meet. And then -- I mean, because all the close protection people were with the people they were going to be with from the 5th through the 6th.

And then, so, like, the only other people that was supposed -- like, there was supposed to be any meeting was, like, the people for the stages and the people that were going to walk with the speakers and stuff like that, like, the people who were gonna watch the crowd. But, like I said, like, nobody showed up. And that was supposed to be the morning of the 5th.

Q Okay.

I'm going to -- we're now -- does any -- I think we're good. Let's move to the 6th.

We've finally made it to the 6th. So I'm going to walk us through the day. I'm going to ask you questions, but I'm also going to show you messages from the day just to see if you were tracking it and what you were thinking.

[redacted] So can we start with exhibit 45, [redacted] or [redacted]

BY [redacted]

Q All right. And there's a message from Mr. Rhodes I think a little further down.

All right. So this is at 6:27 a.m. on the 6th: "We will have several well-equipped QRFs outside of D.C., and there are many, many others from other groups who will be watching and waiting on the outside in case of the worst-case scenarios."

Help us understand this text, if you can, from Stewart Rhodes on the morning of January 6th.

A Well, I know -- because Stewart knew we didn't have a QRF, so I don't know why he would, you know, put that out there. But he did say that, you know, he knew there were other groups outside of D.C. who, you know, might have been armed, like, prepper groups and militias and stuff like that.

Q Did he ever say any names of these groups?

A He didn't.

Q Did he ever say where they were?

A He didn't. He just said he -- he just said he knew there -- hey, man, I know there's other groups. Like, you know what I mean? Like, making, like, a -- it almost seemed like he was making, like, a sure assumption.

Q Also, though, you just said he knew that we didn't have a QRF, but, like, you've seen the video now where there are Oath Keepers bringing up guns --

A Well -- so, yeah, but, like I said, I can only talk about what I knew. You know what I mean? So --

Q So when you said "we knew," you're saying "I didn't" --

A Yes. I didn't -- I didn't plan for a QRF.

Q Okay. Sorry. I --

A And Stewart -- like, Stewart knew our group -- like, our security plan didn't call for a QRF. And so, like I said, like, outside of what our plan for our security group, we didn't have a QRF.

So when Stewart put this message out -- and, like I said, like, I didn't even see the message until, you know, after everything. And so, like, Stewart knew we didn't have a QRF. But when he was talking about the other groups, he was like -- like, a sure assumption, like, he knew for sure there were other groups who had weapons outside of D.C.

Q Mr. Simmons, I swear I'm not trying to attribute this to you, but, like, you're saying, "We didn't have a QRF," but we've seen videos of Oath Keepers with the QRF. We have Mr. Rhodes right here saying, "We have QRFs here."

So are you saying you weren't aware of it, or are you speaking for Mr. Rhodes here?

A Like I said, I'm only speaking for what I planned. So me, my role in planning security. We did -- I did not plan for a QRF, because we didn't have enough people.

So we -- when I say "we," I'm saying my security plan. You know, our close protection guys, we didn't have a QRF, because we didn't have enough guys.

So, if Stewart had a QRF outside of D.C. that he set up outside of my security plan, I wasn't aware of that.

And so, like, that's why I'm saying, like, I find out a lot of stuff after these events took place, just like the stuff I found out about the North Carolina people who, you know, were doing their own thing and had their own stuff set up. Like, you know what I mean?

So, like, if Stewart had a plan for a QRF, he didn't fill me in on it, in terms of the security planning that, when I sit down with Stewart and say, well, hey, this is how we're going to do this, he never said, oh, I've got a QRF. Like, you know what I mean?

So I can only talk about what I planned for and what my security plan was for said events.

Q Understood. Understood. Okay.

[redacted] You can take that down, [redacted] Thank you.

BY [redacted]

Q So I believe you all left the hotel, the Hilton Garden Inn, around 8:20 a.m. Does that sound about right?

A Yeah. It was me and Kelly and Stewart in the car.

Q Were there any other Oath Keepers that left with you all that morning, or was it just y'all?

A Well, everybody left. I think Joe and Landon might've took a Uber or something like that. Like, they came out a little later.

Q I guess I never asked this. Do you know Joe and Landon's last name?

A Landon's last name is Bentley.

Q Okay.

A I don't know Joe's last name. Joe was Landon's friend. They were both in the military together.

Q Okay. And they're both Kentucky guys, right?

A Yeah, both of them stay in Kentucky. Now, Joe is not a member of Oath Keepers, but Landon is. But --

Q And they haven't been charged. That's correct, right?

A Huh?

Q Joe and Landon, they're not charged, are they?

A No.

Q Okay.

So, then, walk -- you kind of talked about this, but walk us through Roger Stone's movements. Because you were receiving updates from Mr. James. So what updates did you receive from Mr. James about Roger Stone on January 6th?

A He would just tell me, like, hey, you know, we're on the move, and stuff like that. Like, he called me every time they went from one place to another.

But they were on two golf carts, and they were riding around downtown. So, like, he would call me and say, well, hey, man, we're on the move, you know, I'll call you when we get to where we're going, and stuff like that.

So, like, I think initially, like I said, like, they went up the street to a couple places, like, up that main road he said they were on.

Q This is on January 6th?

A No, the 5th.

Q Oh, no. On the 6th, walk us through --

A Oh, on the 6th? Oh, no.

So he took Roger Stone to the Ellipse, and they wouldn't let him in. And so he took him back to the hotel. And then, from the hotel, he was ready to go back to the airport. And so Josh said that he dropped him off at the airport.

By this time, all the stuff was going on already. And so, when I finally talked to Josh, he said that he had dropped Roger Stone off at the airport. I was like, well, man, where are you coming to? He said, well, I'm headed your way. And I told him where I was at. And he was like, okay, I'm going to come over there.

Q We'll get into that a little later. But who didn't -- do you know who didn't let Mr. Stone into the Ellipse that morning?

A I do not know who didn't. I'm assuming when he say "they" he was meaning Secret Service or whoever was letting people in. Because, you know, they also didn't let in the Florida people with their body armor on.

Q And what was your understanding of -- you've touched on it, but I just want to make sure I'm clear. What was your understanding of how Mr. Stone felt about not being let in?

A I mean, he didn't feel too good. In fact, he was ready to go.

Q Got it. And so he left, like, late morning, early afternoon of January 6th?

A I know -- like, I'm not sure when he left. I know Josh dropped him off at his hotel, and from his hotel he was heading to the airport.

Q Did Josh take him to the airport?

A Not to my recollection. I mean --

Q Okay. So --

A In fact, I would say no because of how fast he got to -- or how fast, you know, everything happened. You know what I mean? Like, there's no way you could take him to the airport and then be back and then still make it to the Capitol.

Q Got it. Okay.

So, then, at 11:02, it looks like --

[redacted] And can we pull up exhibit 38, [redacted] just so we can give Mr. Simmons a frame of reference?

BY [redacted]

Q At 11:02 a.m., it looks like Mr. Rhodes sends out directions for the Latinos for Trump event on the Capitol Grounds. And you can scroll down to -- here it is, the Alcon (ph), the freedom rally with Latinos for Trump. And he gives the directions for it.

Does this look familiar?

A Well, so the Latinos for Trump stage, it was Stage 7.

Q Okay.

A And that was, like -- like I said, it was on the other -- like, it wasn't at the Capitol.

Q Okay. But it was on the Capitol Grounds. It was near the Capitol, not at the Ellipse, right?

A No, it wasn't at the Ellipse. It was near the Capitol. It wasn't a far walk from there to the Capitol. So, like, it was -- I would say the other side, but, like, you know, you had to walk up a couple streets.

I mean, it wasn't that far, I mean, because, like, I walked from Stage 7 to the

Capitol when everybody started saying that they were storming the Capitol or they were, you know, fighting with the police at the Capitol.

Q Got it. Okay.

So who was with you? Because I see right here, "Anyone who's trying to link up with me or Whip, go there."

Who actually ended up linking up with you all at this time?

A I think it was only a couple guys that came in from South Carolina.

Q Do you remember, was Frank Marchisella one of them? Do you remember him?

A You know, I don't know any one of their names.

Q Okay.

[redacted] You can take this down. Can we pull up exhibit 48?

BY [redacted]

Q So, as you see, I'm just working through the morning via the Signal chats. You can scroll out.

So it looks like Horse Whisperer Texas sends Proud Boy movements or pictures.

Why were you all tracking the Proud Boys?

A I don't know why they were tracking the Proud Boys. And I know the Horse Whisperer person is supposed to be, like, a mobile overwatch or something like that, from my understanding.

Q Okay. Do you know this guy? Do you know who he is?

A I don't.

Q Okay.

So you don't know why the Proud Boys are being tracked within the chat?

A I don't.

Q Okay.

[redacted] Can we pull up exhibit 32, please, [redacted]

BY [redacted]

Q So now we've moved past the morning of, and we're starting to get more to the vote.

And you can scroll out a little bit. Right here.

Stewart Rhodes says, "All I see Trump doing is complaining. I see no intent by him to do anything. So the patriots are taking it into their own hands. They've had enough."

Do you recall -- I guess, let's backtrack. People start to storm the Capitol, like, 12:50-ish.

A Trump was still talking when they started fighting with the police.

Q What are you thinking -- where are you at this moment?

A I'm still at Stage 7. I'm looking at the -- I'm looking at the monitors. Like, it's me and Joe and Landon. We're both standing there. We're looking at the monitor. I don't know who's on stage talking, but nobody's really, like -- like, everybody's looking at Trump.

And, you know, a couple of the people in the crowd were like, what the hell? I mean, because this was just, like, a -- it was just, like, a talk, like, a regular Trump speech. Like, you know what I mean?

Q Yep.

A And then somebody came over and was, like, well, hey, they're attacking the police.

And, you know, the first time, you know, I heard it, I was like, well, damn, you know. But when they came back and said, well, they're attacking the police and they're

storming the Capitol, I walked over there to see what was going on.

Q And what were your thoughts at this moment -- at that moment?

A Well, I wasn't thinking anything. I wanted to see what was going on. But when I got there and they were storming the Capitol -- like, they were past the first gate, past the second gate. The cops were pushed all the way back up against the building. Like, what in the entire hell is going on?

And so I tried to reach out to Stewart a couple times, because I don't know where the hell he went to. Him and Kelly walked off and went somewhere. So it was me, Joe, Todd, and Landon. We walked over there. And we just stood there and looked at the stuff happening and going on.

And, like I said, I called Stewart a couple times, because the phone didn't go through at first. And when I actually talked to him, I was like, well, hey, man, you know, they're storming the Capitol. I think you need to get over here and look at this. And then I told him, you know, I'm gonna try to get accountability of the guys.

Q Where was Mr. Rhodes when this is happening?

A I don't know. Him and Kelly went somewhere.

Q When did you lose track, I guess, of Mr. Rhodes and Kelly that morning?

A Well, we left Joe at the rally point. And then Landon was there. So I walked back to the Jefferson Memorial to move the car back over by Stage 7. And, you know, that's it. You know, I didn't see him. And so, when I moved the car back -- and remember how far a walk that is.

Q Yeah.

A So, you know, I get the car over there, park it, and then I get up to Stage 7. You've got the two guys that showed up from South Carolina and Joe and Landon. Todd was over there. Stewart wasn't there. Stewart and Kelly were both gone. They told

me that they did a little speech and then they walked off. And so we were standing there looking at Trump's speech.

Q Got it. So, when this message comes in, Stewart is not at the Capitol. Is that correct?

A You know, like, I didn't see Stewart at the Capitol until most of the stuff was starting to calm down. So I don't know what time Stewart got there. I remember texting him, calling him. You know what I mean? But, like, we were -- you know, when I talked to him, he was -- he was at the Capitol when I finally talked to him. He said he was on the other side, and he wanted me to walk towards him. And I'm like, Stewart, there's too much going on. Like, you know, let's just meet in the front.

And I had talked to Josh. And we were just, you know, walking around to the front. And so, like I said, like, I didn't actually see Stewart until stuff had started to calm down. They had already ran in the front, they had already ran into one of the sides, and they were still busting windows on the right side of the Capitol. And cops were still shooting flash-bangs and throwing tear gas at people.

And they had went up the back steps. They had, you know, moved the cops off the back steps. That's where the guy snatched the other cop's paintball gun. I think, like, there was some guys climbing on the wall, and the police pushed one of them off the wall. And when he pushed him off the wall, a bunch more people decided to run up those steps to try and make those cops move so they can get in the building.

Q I guess, when you look at this quote right here of "All I see Trump doing is complaining. I see no intent for him to do anything," what is -- I mean, I know you're not Mr. Rhodes, but he had to have talked about this before. What did they think President Trump was going to do on January 6th?

A Well, a lot of people thought that he should invoke the Insurrection Act.

You know, they were -- a fuck-ton of people were waiting on him to say something, other than, you know -- something. You know, hey, man, say something. Like, you know?

And so I can't say exactly, like, what they were waiting on, but, you know, like, they wanted him to -- I guess they wanted him to make some kind of comment about the Insurrection Act or, you know, let's do this. You know, like, who knows for sure? But I know people were waiting on him to do something other than have a mundane speech.

Q I guess, when Mr. Rhodes says, "The patriots are taking it into their own hands," it seems like he's almost -- I mean, the term "patriot" is not a bad term about someone -- like, almost like he's supporting the people going in the Capitol. Is that a fair way to read this message?

A You know, I can't say how he felt about it. But, you know, it's just -- you know, all I can do is look at it and read it, like I said. Like, I didn't -- I didn't see this message prior to now.

Q Okay. And this is at 1:38, too, on January 6th, just so we're clear for the record.

[redacted] We can take this down, [redacted]

BY [redacted]

Q So I don't -- we have your phone records. I don't think I have to go through and show them to you unless you want me to. I could just tell you the calls that I'm curious about.

At 2:00 p.m., for example, there's a call with Joshua James. Do you -- I guess you kind of talked about this. What were you talking about with Joshua James after the Capitol was being breached?

A Well, we were talking about -- like, we were trying to physically meet. So, like, I wanted to get control -- like, I wanted to get at least -- like, at least let me know

where my guys are, you know? So I said -- because, you know, I never used Signal in the middle of the operation, and I even got on Signal and told guys, like, if you're not on the operation, you know, come see me at the Capitol.

But, you know, the only person I talked to was Josh. I didn't talk to Jeff. I didn't talk to Kelly. The only person I talked to was Josh. And Stewart. Outside of that, Landon, Joe, and Todd was with me. I knew the two South Carolina guys were still at the stage.

And so, like, I did a lot of back-and-forth with Josh just trying to meet up with him at the stage. Because he told me he was -- I mean, not at the stage, at the Capitol. Because he told me was coming over there. I was like, okay, well, you know, call me and we can meet. And so he told me he was in the front, so we started walking around to the front. You know what I mean? And I was just trying to find him.

And so, when we finally actually -- when everybody actually met, that's when everybody met at, like, that far corner of the steps.

Q So, when you were saying "trying to find my guys," I'm assuming this is almost like a recall. Is this what you're kind of going through in this moment? Just trying --

A Yeah. Like, okay, I know I got guys -- like, I haven't heard from Jeff, you know, haven't heard from Kelly. I've talked to Josh a couple times, but that's it. You know what I mean? And I know where the South Carolina guys are.

So I was trying to get a full accountability of all the guys that I knew to be out. And so --

Q It sounds -- sorry.

A Supposably security. So when I say, hey, look, you know, if you're not on operation or if you're not, you know -- if you're not working, basically, come meet me at

the Capitol.

Q And I was going to show you that Signal. It sounds like you know it very well, right? You said, "They've taken ground at the Capitol. We need to regroup any members who are not on a mission."

What were you all regrouping to do?

A I just wanted accountability, right, at that point. Like, hey, let's regroup. You know what I mean?

Q And you say -- I know what it means, I think, when you say accountability, from the military, but what do you mean by "accountability"? Can you just --

A Like, I need to know where y'all at and what y'all doing. You know, if you're working for me, I need you here if you're not still working, basically. Like, I need to be accountable of what you guys are doing.

Q Okay.

And so, then, we know that around 2:36 p.m., I'm going to say, like, the first stack went into the Capitol. Were you tracking any of this on January 6th?

A I was not. And when they say "stack," I'm like, well, what in the hell they mean? Like, I had to see the video to see what they meant by "stack." You know what I mean? Because, like, "stack" to me has a different definition.

Q Yeah.

So how would you describe, just so we have it accurate for the record, the way you've seen the video of them going in the Capitol on the east-side steps?

A Yeah, I've seen the video.

Q No. How would you describe them going into the Capitol?

A Oh. Man, I -- so, first of all, you know, I wouldn't call that a military formation, you know. It's just a line of people walking with their hands on their

shoulders. But, you know, they very tactically did walk through the crowd. I just wouldn't call it a military operation. Now, I wouldn't call that a stack either, but, I mean, it's just -- I'd call it just a line of people working through.

Now, I will say this. In the security world, you know, we do stuff like that sometimes if it's a crowd. You know, you say, like, "Grab my belt, and this is how we're going to move through this crowd," kind of thing.

But, you know, when I first heard about it, the reason that he gave me for going in -- you know, he said they were going in to render medical aid --

Q Yeah.

A -- and help people that way. And, you know, hell, it's a video of them walking out with some police officers who were, you know, pretty beat up.

But, you know, outside of that, like, I can't think of any other reason why they would decide to go in there.

Q Right, because --

A Because, like, some of the people that I seen with Kelly, you know, wasn't Florida guys. Hell, I didn't know Josh went into the Capitol until damn February, and he sat right at the dinner table with us. You know what I mean? And, you know, like, I didn't know -- I didn't know Kelly had even met up with Jessica. Like, you know what I mean?

So, like, it was, you know, kind of shocking, because, hell, as many times as, you know -- I'm sure Kelly had, you know, opportunities to reach out and say, well, hey, this is what's going on. You know what I mean? I didn't hear from him. I heard from Josh. I didn't hear from Jeff. You know?

So, when I seen the stack going up the stairs, I was, you know, kind of shocked.

[redacted] Can you pull up exhibit 37, [redacted]

And right here.

BY [redacted]

Q Do you recall Congressman Ronnie Jackson's office calling you all for help on January 6th?

A I do not recall that.

And, you know, in a -- I will say this. You know, if somebody was to call us for help, you know, outside of you texting my phone or calling my phone, there's no way, like -- because I'm not on the Signal chat in the middle of the op. So, like, there's no way I would've knew about anybody calling for help.

Q Got it.

A So, you know, I didn't know anything about anybody calling for help.

Q Okay. Okay.

[redacted] We can take this down, [redacted]

BY [redacted]

Q So, around 3:40 p.m., after Mr. James has actually already walked out of the Capitol -- so he's gone in and he walked out -- he calls you at around 3:40 p.m. Was this you all discussing that rally point again for accountability?

A Well, so when he -- after he called, like, when stuff was starting to calm down, we were already sitting on the steps. And it was just one of those, well, hey, man, we're on the steps.

Q Okay.

A You know what I mean? And so, like, everybody ended up meeting on those steps. It's like --

Q This is the 4 o'clock meeting on the northeast corner of the Capitol on the steps?

A Yeah. Yeah. Everybody ended up meeting on those steps.

I mean, because, like, you know, me and Landon and Joe, you know, we're standing, we're looking at the stairs, and we're seeing all this stuff happen. Like, there's an MRAP. There's a guy sitting on an MRAP. There's, you know, still people going in. We still hear stuff going on on the side.

And then, you know, I think either Landon or Joe spotted Stewart and was like, there's Stewart over there on the steps. And so, like, we walked over there. And everybody started to, you know, come over to those stairs.

Q What was discussed while you all were just sitting on the steps? Once Mr. Rhodes and, you know, Kelly Meggs and everyone gets there, what were you all talking about?

A Honestly, like, there was some stuff that happened inside. There was a guy who was, you know, trying to get people to go and have a sit-in. He's like, hey, man, let's go, let's go occupy the Capitol. And he's talking about the lady who got shot and stuff like that. And, you know, he wasn't -- like, I've never seen him before. He wasn't an Oath Keeper or anything. He was just trying to get people to go in the Capitol with him.

And then they were talking about the guys who were still trying to get in to the side of the building. And, actually, like, me and Landon walked off to go back and look at the back side of building, because there were still, like, flash-bangs going off, and these guys were still trying to get in.

And so we walked off. And when we came back, we still, you know, stood there a little while longer, watched the crowd jump on the CNN people. And then we walked off.

Q I guess, why did you leave? How come the Oath Keepers didn't go back in?

Like, did they say why during this meeting?

A Did they say why what?

Q Why they weren't gonna go back in or try to go back in?

A Go back into the building? Like, nobody talked about going into the building.

Q Okay.

A Like, you know, we just -- they just were, you know, talking about, you know, like, people trying to still get into the building. Like, because they were still fighting on the -- like, if you're looking at the steps, the right side, they were still fighting with the police on that right side, and they were still exploding flash-bangs and stuff like that.

So, like, I walked back over there and was looking at that stuff for a while, and then I walked back around to the steps. And there was, like, a bunch of police still standing there, and then some people had started fighting with the police that were standing there.

Q So you don't recall any discussions during this 4 o'clock meeting where the members were talking about how they had just gone in the Capitol or anything like that?

A Not that I heard, you know.

Q Okay.

A I didn't hear anybody talk about going in the Capitol right there. So it's like, when I seen the video, I'm like, damn. You know, I kind of felt like -- because, you know, Kelly told me he went in and why he went in, but this was while I was driving home.

Q Got it.

A And he was trying to get in touch with Kellye because, you know, she was named the group's legal counsel.

Q Right.

I guess, at 4 o'clock, you see all this going on at the Capitol. You're not an Oath Keeper. You didn't go in the Capitol. Like, what are you thinking about what's going on at this time?

A "I can't believe this shit happened" is actually what's going through my mind. Like, I can't believe this shit happened. Like, you know, like, these folks lost their damn mind.

But -- and it was still going on. And then, like, what ramped the crowd back up was when, like, a group of people -- like, CNN's setting up all their stuff. They're neatly setting it up. They got the backstrap set up. They're putting up the lights. The reporter's sitting there. He starts talking crazy to somebody in the crowd. And somebody else snatched him, took the microphone out his hand, and threw him into the crowd. And they just trashed everything CNN had. I was like, oh my God.

And so, like, a bunch more cops showed up. And so, you know, it's like, well, hey, man, I'm'a walk to the car.

Q So you -- I guess that was my next question. You just walked back to the car and then drove back to Virginia? Is that kind of how --

A Yeah. Walked back to the car. Drove back to the hotel. Got ready to get my shit ready to leave. And they wanted to go to dinner.

Q So you all went to Olive Garden that night, right, in Virginia?

A Well -- so I was gonna just leave, and Stewart was like, "Well, hey, man, come sit down and eat with us. We're gonna meet with the 1AP guys." And Landon was ready to go. I was gonna leave. And I talked Landon into going with me. And so me and Landon and Joe, we rode around. Joe spilled his beer in my back seat.

We got there, and we were talking to the 1AP guys. Joshua James was there with us. You know, they were talking about the lady who got shot. You know,

this -- you know, it -- the chick getting shot. Mike calls a bunch of veterans to rise up against what was going on in the government. You know, shit like that.

And then, you know, they were talking about other stuff that was going on around the country. Like, apparently, at the same time the Capitol got hit, some other State's capitol got hit, same time, same kind of way, or something like that. And so they were talking about how they might try to say it was an organized attack and stuff.

And, you know, again, Josh is sitting at the table with us. You know, Josh is kind of quiet and reserved, but, you know, he's doing the Josh thing. You know, didn't mention at all he went in the Capitol. Kelly's having phone conversations with people. And, you know, just ate and left.

Q So you met with the 1AP guys that night at Olive Garden eating?

A Yeah, we met -- it was a couple 1AP guys there.

Q What were they -- I guess, were they talking about that they had gone in the Capitol? Or what were they talking about?

A No. They were just talking about, like, you know, how the veteran lady getting shot might cause a spark amongst veterans against the stuff that was going on in the country and stuff like that, and a Black man. You know, just people's opinion about, you know, what was going on.

But, you know, nobody talked about running in the Capitol. You know, nobody mentioned they went in the Capitol. And, again, Josh is sitting right next to damn Landon. He said nothing about going in the Capitol. Like, golly. But, you know what I mean?

When we left dinner, get back to the hotel, Kellye pulls -- like, Kellye drove up to the hotel. She was so frantic. And she was like, hey, you know they're looking for people. They're gonna come and -- you know, the police or whoever's gonna come and

grab people. You know, they're looking for people. And she went way so far left field that she was talking about how they were gonna do drone strikes on me and my family. Told me I need to go home and move my people out. Like, Jesus Christ.

And so everybody left. And she was still ranting and raving. And it was just, you know -- I just casually collected my stuff, filled up my gas tank, and got on the road.

Q What was Mr. Rhodes's mood like on the night of January 6th?

A I mean, he was -- you know, no changes. Just, you know, Stewart. You know, talking about, you know, this could be a spark of the revolution. And, you know, like, people are gonna start to talk about, you know -- because, like, remember, like, all the other capitols got hit -- and he's like, people are gonna start to talk about how this might be a planned attack. And he was like, I just think it's patriots being upset about what's going on. And stuff like that. You know, just Stewart.

Q I guess I have to ask you: Like, he's talking about a revolution. Like, there was just a violent day at the Capitol. I'm just trying to understand, because it seems like you're not attached to this at all, like, what are you thinking. Like, let's just say you leave, right, to go back and you call someone as a friend; like, what do you say about what just happened and the dinner you just left?

A I mean, it's -- I mean -- I mean -- same kind of stuff you'd say. Yo, man, look, this shit was crazy, man. Like, you know what I mean? These people just ran up in the Capitol. Like -- so, you know, it was conversations like that, you know.

But, like, me listening to Stewart talk about stuff like that, like, to me it was just Stewart talking about stuff. You know what I mean? So, like, that didn't move me too much.

But, like, the events that happened? Yeah, like, I've never seen anything like that in the United States. You know what I mean? Now, like, you know, I wasn't real

bothered, but, I mean, I've seen stuff like that overseas, but just not here. So, like, it didn't -- you know, it didn't make me nervous or anything, but it was just the fact that it's in the U.S.

Q Yeah.

And I'm not going to show you the message because you've already touched on it, but we've seen messages in the same Signal chat -- so I believe you weren't reading -- where Ms. SoRelle was telling everybody to delete their Signal chats.

A Oh, Lord.

Q You didn't delete yours. I guess -- and I can show -- it might be worth showing you this just to -- and it actually is important to show you because --

[redacted] Can we show 42, exhibit 42?

BY [redacted]

Q Because, when I read the chats, it almost made it seem like you were part of the group that was advising on what to do at this point. And I just want to make sure we're clear.

So this is the messages from Kellye SoRelle. And what day is this? Can we go back up and see what date it is? It's January 8th. So scroll down.

It says, "Please delete any information you posted regarding the D.C. Op and your involvement. This thread will be deleted when possible."

Okay. So that's part one.

[redacted] And then can we go to exhibit 49?

And then can we scroll down?

BY [redacted]

Q I think it's Ms. SoRelle again. Oh, it's GLM, this person. Oh, yeah, here it is -- Ms. SoRelle, Ms. SoRelle, sorry. She says, "Stewart's monitoring through his phone,

but yes if you can't get to Stewart through me, if anything happens to shut down this line or comms, get with Greg or Whip."

I guess what I'm trying to understand, the way I read these messages was, like: delete; Stewart's monitoring; if you need anything, get with Greg or Whip.

So you weren't in on any of this?

A Well, like I said, like, if it's not directly involving me, it's just shit that they're talking about. You know what I mean?

Now, Greg was the vice president for --

Q Who's Greg, by the way?

A Greg McWhirter.

Q Oh. That's the vice president for the Oath Keepers?

A Yeah, he was. Yeah.

Q Is that your friend that brought you in?

A Yes.

Q Big Greg. Big Black Greg, right?

A Yeah, yeah. Yeah. Now -- so Greg is kind of upset by the whole situation, like, the whole situation, the whole operation, everything.

But, like, you know -- so Kellye telling people to get in touch with Greg or Whip, I mean, it wouldn't surprise me, like, you know, because, shit, I'm close to Greg, and, you know, hell, for the past -- since November, I've been around Kellye and/or Stewart.

But, I mean, hell, as an attorney -- and this is just my personal opinion -- as an attorney, you know, she probably should've known better.

Q Yeah. Got it. Got it.

I guess, what was Mr. McWhirter -- you said he was upset by the whole thing. What was he upset about?

A Well, he felt like there's no reason why Oath Keeper members should've ran up in the Capitol, one. Two, how is it that Stewart doesn't know any Oath Keeper who ran up in the Capitol? And, three, why is it there's Oath Keepers in D.C. at said rally and Stewart not knowing about it?

Q Got it.

A You know what I mean? He just felt like it was a drop of the ball on leadership.

And, you know, him and Stewart's talked about that before. He's mentioned it to me. Like, we've had conversation where we've all been on the phone and he said, like, "Hey, Stewart, man, you fucked up." You know what I mean? "There's no reason why there should've been any Oath Keepers that the security leader didn't know about or that you didn't know about."

And so he just felt like it was a huge, huge, huge drop of the ball.

Q Got it.

So when did you get back home to Indianapolis?

A I left, shit, probably somewhere on the 7th.

Q Okay.

And you described some of your talks with Ms. SoRelle a few weeks ago. But I guess, if you could generalize your conversations with the Oath Keepers after January 6th, what were they like?

A Again, you know, really, like, outside of Kelly hitting me on Signal -- you know, Josh ended up going to Florida to do protection for Kellye initially. That's who he had go out to do protection for Kellye, was Josh and somebody else. But, you know, I talked to Josh. You know, he's still asking me security-related questions and stuff like that while he was down there with Kellye. And he was telling me what the situation was

and, you know, how she was nervous and, you know, she felt like people were following her and stuff like that. So, like, we talked about that.

But, you know, I still conversated with Landon. Landon was in disbelief. You know, Greg was upset.

But, outside of that, I don't really talk to any other Oath Keepers.

Todd might've called me maybe three or times since. But, you know, hell, one time Todd called me, he was drunk and, you know, he was all over the place. Like, sounded like he was stressing out about what was going on. Then another time he called me, he just, you know, wanted to talk. Had asked me if I'd heard from Stewart and stuff like that, because Stewart went dark for a couple weeks after the 6th.

Q I guess one question I had: You said Kelly called you. What did Kelly call you and tell you?

A Kelly?

Q Meggs.

A Meggs? This was the Signal conversation where he was telling me why he went in and he was trying to get a hold of Kellye SoRelle.

Q Got it.

Is there any topic I've hit on -- that I haven't hit on that the FBI hit on with you about January 5th and 6th?

A No, not really. I mean, you asked about financials. You asked about everything -- well, yeah, you've -- just about everything.

Q Okay.

Well, I do have just a few more questions. And this is gonna go more, like, messaging that you might've heard. And just let us know if you know or if you have an opinion on it.

But when -- and I think you've touched on this, but I want to ask it explicitly. When the Oath Keepers would provide personal security or event security in general, what did they see as the biggest threats?

A For January or period?

Q In general.

A It just depends on what's going on. Like, you know, with BLM and antifa and, at one point, the NFAC people -- I remember a lot of people thought NFAC, like, the NFAC group was gonna be, like, problematic. So, you know, they were requesting security and stuff like that. And so, like, they'd reach out to groups like the Oath Keepers and stuff. And so, like, Stewart would, you know, send some people down or go down and stuff like that. But, like --

[2:11 p.m.]

BY [redacted]

Q What is the NFAC group? I don't even --

A You never heard of NFAC?

Q Oh, NFAC. Gotcha. Yeah.

A Yes.

Q I do, actually. I know what you're talking about, but --

A Yeah.

Q -- guys with the guns, right?

A Yep. What?

Q Got it. Okay.

A And so, you know, when -- and it's funny you mention that because, like, you know, when -- when me and Stewart had talked about it, you know, he sent some people down to an NFAC rally.

And I was like: Well, Stewart, listen, bro, like, you are trying to fix the rhetoric of people saying that they think you're a White nationalist group or a racist group. However, like, if you're going to send a bunch of White guys with guns because a bunch of Black people with guns show up, how does it make you look?

He was like: You know, I really didn't think about that, Whip. You know what I mean?

And so, you know, it was just stuff like that. Like, where, you know, he -- you know, it's just -- the threats would be determined by, like, what's going on --

Q Got it.

A -- you know?

Q And you've talked about already how you prepared for those threats. Who did the Oath Keepers view as allies, I guess, is the question I have when you were doing protection?

A Just, you know, other patriots, patriot groups, you know, law enforcement, you know, first responders, you know, just, you know, people. They just good people. You know, they don't just look at somebody and say: Hey, you know, everybody's -- you know, everybody's -- it's us against them. You know, they just -- you know, every -- everybody's an ally until you show differently.

Q Was President Trump considered an ally of the group?

A Depend on who you ask.

Q Okay. Mr. Rhodes?

A Yes and no.

Q Okay.

A Sometimes yeah, sometimes no.

Q Because of the reasons you said earlier, where Mr. Rhodes would call him like an idiot, for example? Is that --

A Yeah. Like, he -- I mean, it's just -- I mean, he wasn't quiet about his dislikes for Trump.

Q Got it.

Are there threats that you witnessed that Americans are facing that convinced you to want to work with the Oath Keepers, or was it kind of just like a purely financial thing?

A Honestly, man, like, being out -- being out with those guys in Texas, man, like, you know, it was -- it was -- it was righteous. You know what I mean? I can -- I can get behind, you know, the core principles of the group. You know what I mean? It's a bipartisan group that wants to help the community, you know, and they're staffed by a

bunch of military and law enforcement guys, former first responders.

So, like, you know, looking at it from the outside to me sounded like a good idea, but, like, you know, when I first seen them, you know, I thought they were racist. But, when I actually went to work with them, it was -- it was pretty righteous.

And so, when he reached out to me, you know, I didn't mind working for him, one, because of, you know, what I've seen them do in the past and the stuff that I heard Greg talk about, and so, outside of that, you know -- you know, secondly, it was, you know, financially beneficial to me, because, you know, I was in between jobs right then.

So it kind of worked out in two ways. You know what I mean? Because, like, hell -- you know, and, honestly, if I was working, I probably still would have went to help them in Louisville, just because of, you know, what he laid out, what he was trying to do. You know what I mean?

Like, the Cuban restaurant that was getting threatened -- you know what I mean? Like, these guys went up in his restaurant, tore stuff up and told him that, if they -- if they didn't make a contribution to the Urban League, that they would come back.

And so Stewart was like: Hey, man, you know, look, it's a Cuban restaurant. The owner is Cuban. You know, it's a minority business. They've been around for a while. Go in there, give them a threat assessment, and, you know, saying, see if he'll let you, you know -- you know, see if he wants us to help him with security.

And, you know, the first words out the guy's mouth was like: Well, man, after all the damages I had to pay for, I can't afford to pay a security company for a threat assessment.

So, you know: Hey, look, the Oath Keepers are paying for it.

It was like: Oh, well, who the hell are the Oath Keepers?

You know what I mean?

Q Right. I guess I'm asking this because I think I've heard it, but I want to make sure I'm understanding. Did it kind of remind you of like your military time when you were around the Oath Keepers?

A I -- well, not -- not me, no, I mean, because, you know, I got out the military to be a contractor, and so, like, it's -- you know, I've -- I've -- you know, I've been around, like -- I've been around private contracting for a while. So it's -- it's -- it's not that they reminded me of military time.

But, you know, it -- it is some sort of camaraderie, so to speak, you know, so I can see where guys would say, well, yeah, man, it's just like being back in the military, I mean, because, you know, it gives guys a purpose. Like, when they come out to help with security, it gives them a purpose, and they're with like -- they're with like-minded people. You know what I mean?

Q Got it.

A And so, you know, now, me being dark, it's a little different because, you know, what is like-minded people? You know what I mean? Like, is their mind going to be like mine? Like, you know, are some of our goals different? Just like -- like -- like what I told you about me telling Stewart about them. They're like: Every time NFAC shows up, like, if people ask you for help, you're going to send a bunch of armed White guys because a group of Black armed guys show up, like, you're not changing how -- like, you're still going towards what people perceive your group to be.

And so, you know, I mean, I get it if somebody says, hey, it reminds me my military time, but, you know, it's different for me. Like -- like, you know, their mission was righteous.

Q Right. Right. Did you ever -- in your mind, did you ever see or think that, like, politicians were agreeing with the Oath Keeper missions?

A Say it again.

Q Like politicians -- did you hear them talking about or see politicians supporting the Oath Keepers' mission? And, if you didn't, that's fine. I just want to know if you've ever seen that.

A I didn't, man. I mean, like, you know, by and large, a lot of people think the Oath Keepers is a big militia, like -- you know what I mean? Like, when you -- you know what I mean? It's -- but it's the same thing I thought, too. Like, I thought it was a racist militia before, you know, I had started actually, you know, getting into it or, you know, talking to people who was around it, stuff like that.

But, like, you know, like I said, it still doesn't erase, you know, the company that I seen them keep at the -- at the gun show, you know, my first impression. And first impressions speak a lot.

Q Right. So you view them as a little more righteous now, but you still are aware of the company that they might attract or keep. Is that fair?

A Yes. Yes. I mean, because even in Louisville, like, the Kentucky Mountain Ranger guys, you know, Stewart puts out a call to action; you don't know who is going to show up.

And so, you know, Greg always tells him: Hey, look, we need a dedicated, core group of people that can go and do these security jobs when these organizations ask you to come out. And so, you know, they've been going back and forth about that, but, you know, in the meantime, Stewart puts out a call to action; you don't know who is going to show up. And just like -- just like the -- just like the Ohio people. Like, one person is an Oath Keeper, and he brings his militia with him. You don't know these guys.

Q Right.

A And, well, quite honestly, like, you're such a big group, you don't know all

the members you have now. So, like -- you know what I mean? So you put out a call to action; you don't know who is going to show up.

Q Right. How do you personally view the role of militias in America?

A I mean, man, personally, like, I think some militias are just older White guys who wasn't that high-speed in the military try to, you know, live out their glory days, and a lot of them lie about their military service.

And then you got some pretty squared away militias. But here is the thing about it: Like, they don't consider their self to be militias. They call their self shit like prepper groups, or: Oh, we're just a group of people that get together and train.

You know what I mean? You know -- you know, one way or another, like, if you guys show up in masks, armed, they're going to call you a militia, so, you know -- but, you know, personally, that's -- that's how I see it. So it depends on which group you look at and say militia.

Q And are you aware of Oath Keeper -- you mentioned training, but do you recall any, like, joint trainings that Oath Keepers did with local law enforcement?

A No, I don't.

Q Okay. Military, nothing like that? No joint training, or anything like that?

A No.

Q All right.

[redacted] Do any of my colleagues have any followup questions or things they want to circle back on?

All right. Well, Mr. Simmons, thank you for spending a little over 4 hours of your day with us here today on answering our questions. If we have any followup questions, I'll reach out to you and Mr. Olivas for that.

But, with that, we'll go on recess now, and we'll end at 2:20 with the recess. But

thank you.

The Witness. Hey, man, thanks for talking to me.

[redacted] All right. Thank you for responding and showing up here today. Thank you, Mr. Olivas.

Mr. Olivas. Thank you, [redacted] Thank you, Michael.

[redacted] All right. Take care.

Mr. Olivas. Take care.

[Whereupon, at 2:20 p.m., the deposition was concluded.]

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