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

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11 DEPOSITION OF: TAYLOR BUDOWICH

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15 Wednesday, December 22, 2021

16

17 Washington, D.C.

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20 The interview in the above matter was held in Room 5480, O'Neill House Office
21 Building, commencing at 10:01 a.m.

22 Members Present: Representatives Murphy, and Aguilar.

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Appearances:

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

- [REDACTED], RESEARCHER
- [REDACTED], PROFESSIONAL STAFF MEMBER
- [REDACTED], RESEARCHER
- [REDACTED], CHIEF CLERK
- [REDACTED], CHIEF ADMINISTRATIVE OFFICER
- [REDACTED], SENIOR INVESTIGATIVE COUNSEL
- [REDACTED], SENIOR INVESTIGATIVE COUNSEL

For THE WITNESS:

DANIEL K. BEAN
CHRISTOPHER DEMPSEY
JARED BURNS

1

2 [REDACTED] Okay. Well, good morning. We're on the record. This is a
3 deposition of Taylor Budowich --

4 The Witness. Budowich.

5 [REDACTED] -- Budowich, conducted by the House Select Committee to
6 Investigate the January 6th Attack on the United States Capitol pursuant to House
7 resolution 503.

8 Mr. Budowich, can you please state your full name and spell it for the record?

9 The Witness. Taylor Anthony Budowich. T-ay-l-o-r; Anthony, A-n-t-h-o-n-y;
10 Budowich, B-u-d-o-w-i-c-h.

11 Mr. Tonolli. Thank you. This will be a staff-led deposition, and members, of
12 course, may choose to also ask questions. If they do, they'll join by the Webex and you
13 will see them, and I'll announce when they come on, okay.

14 Now, my name is [REDACTED]. I'm a senior investigative counsel with the staff.
15 With me in the room is [REDACTED], a professional staff member. With us by Webex at
16 this time are -- is Ms. Murphy on?

17 [REDACTED]. Yep.

18 [REDACTED] Also, [REDACTED], who is the chief clerk of the select committee.
19 And [REDACTED], who is also a staff member.

20 The Witness. Okay.

21 [REDACTED]: Under the House deposition rules, neither committee members nor
22 staff may discuss the substance of your testimony that you provide today unless the
23 committee approves release. You and your attorneys will have an opportunity to review
24 the transcript. We'll send it to you by email and you can review it to finalize it, okay?

25 The Witness. Uh-huh.

1 [REDACTED]. Now, before we begin, I'm going to just describe a few standard
2 ground rules. We'll follow the House deposition rules that we provided to you and your
3 counsel that accompanied the subpoena that you received. Under the House deposition
4 rules, counsel for other persons or government agencies may not attend, but you are, of
5 course, allowed to have your own attorneys with you. And I see that you have three
6 attorneys here today, and if I could just ask each of you to put your name on the record
7 and spell it.

8 Mr. Bean. Sure. On behalf of Mr. Budowich, we have the Abel Bean Law Firm.
9 We have Christopher Dempsey to my left, Jared Burns to my far right. I'm Daniel Bean.

10 And briefly, as we stated off the record, sir, Mr. Budowich objects to the instant
11 deposition proceedings as the select committee is not properly and duly authorized in
12 accordance with House resolution 503, as it is not comprised of 13 members, five of
13 whom were appointed after consultation with the minority leader.

14 Additionally, the subpoena to appear for the deposition was not issued after
15 consultation with the ranking minority member. Mr. Budo -- Budowich, excuse me, also
16 objects to the deposition proceedings as the subpoena reporting to compel his
17 appearance does not further a valid legislative purpose, ancillary to the legislative
18 authority but rather, serves a quintessentially law enforcement purpose reserved to the
19 authority of the executive branch to which investigating facts, circumstances, and causes,
20 as well as expose and punish alleged criminal wrongdoing as one of the current
21 committee members mentioned in the past few days. The purpose was to turn
22 information over to law enforcement for prosecution, which we believe is not proper for
23 this legislative body to pursue, and therefore, it also violates the separation of powers
24 doctrine.

25 Lastly, Mr. Budowich obviously objects to the violation of constitutional rights for

1 the 4th and 5th. But with that, he understands his responsibility as an American citizen
2 to cooperate with Congress, and he's here to do that to the best of his ability. Thank
3 you, sir.

4 [REDACTED]. Mr. Bean, you introduced yourself and said that. Thank you. I
5 won't belabor the points you raised except to say that the select committee disagrees
6 with the characterizations and the objections, but appreciate that Mr. Budowich is still
7 prepared to testify here today.

8 But your colleagues still need to introduce themselves and spell their names for
9 the record.

10 Mr. Bean. Okay. Very well.

11 Mr. Dempsey. Christopher W. Dempsey, C-h-r-i-s-t-o-p-h-e-r, W, D-e-m-p-s-e-y.

12 Mr. Burns. And Jared Burns, J-a-r-e-d, B-u-r-n-s. Thank you.

13 [REDACTED]. Thanks, all.

14 So as we proceed, Mr. Budowich, please wait until each question is completed,
15 whether asked by me or a member or someone else on the staff before you begin your
16 response, and we'll try to wait until your response is complete before we ask our next
17 question. That's for the benefit of the court reporters.

18 Those court reporters cannot understand a nonverbal response, such as shaking
19 your head, so it's important that you answer each question with an audible, verbal
20 response. So we might catch you saying -- as you just nodded now, Mr. Budowich, is
21 that a yes or no?

22 The Witness. Bad habit. I'll try to do it.

23 [REDACTED]. No, no. It's not a bad habit; it's a human habit. So we ask that
24 you provide complete answers based on your best recollection. If the question is not
25 clear, just ask, and if you don't know the answer, just say so.

1 If you or your attorneys need a break at any point throughout the day, just let us
2 know and we'll take one. We've provided you a breakout room where you can meet
3 privately. We'll also break for lunch, but, again, if during the time maybe we'll shoot for
4 every hour, hour and a half, if you want to take a break if we don't otherwise do so.

5 Okay?

6 We've provided you and each of your attorneys each with a binder of documents
7 that's sitting in front of you. Those binders have documents that are labeled
8 respectively as Exhibits 1 through 68. Throughout the deposition, I'll be directing you, or
9 other people might direct you, to documents in the binder.

10 Most but not all of the exhibits are documents that you produced, and in most but
11 not all the documents also are going to have in the bottom right-hand corner what's
12 known as a Bates stamp. It's just a way to label the document. So we'll both refer you
13 to the exhibit number to turn to the document and, if it's a particular page, ask you to
14 look in the lower right-hand corner, or maybe in the middle to where that Bates
15 number is. Okay?

16 So if -- when we refer you to a document, take whatever time you need to
17 familiarize yourself with it before you start answering questions. Just let us know if you
18 needed to review the whole thing. And as always with emails, it's better and natural to
19 start the bottom and work your way back up, okay?

20 Now, if you could please open your binder to Document 1, or Tab 1. Now,
21 understanding your objection that Mr. Bean put on the record, do you recognize that as
22 the subpoena that the select committee issued to you?

23 The Witness. Yes.

24 ██████████. Okay. And also within there are the accompanied deposition rules
25 that were provided that I referred to earlier.

1 You may only refuse to answer a question today to preserve a privilege recognized
2 by the select committee, and I understand the standing objection that your counsel has
3 raised on your behalf. But if there's something additional, just put it on the record and
4 we can discuss it, okay?

5 The Witness. Okay.

6 [REDACTED]. If you refuse to answer a question based on a privilege, staff, myself
7 or whomever else, may either proceed with the deposition or seek a ruling from the
8 chairman of the committee on the objection. If the chairman overrules such an
9 objection, you are required to answer it.

10 I also want to remind you that it is unlawful to deliberately provide false
11 information to Congress. Since this deposition is under oath, providing false information
12 could result in criminal penalties for perjury and/or providing false statements. It's a
13 standard disclaimer, as I'm sure your counsel have told you, for any witness who appears.
14 Do you understand all that?

15 The Witness. I do.

16 [REDACTED]. Do you have any questions before we begin?

17 The Witness. I do not.

18 [REDACTED]. So I'm going to ask you to please stand up and raise your right hand
19 to be sworn in.

20 The Reporter. Do you solemnly declare and affirm under the penalty of perjury
21 that the testimony you shall give will be the truth, the whole truth, and nothing but the
22 truth?

23 The Witness. I do.

24 EXAMINATION

25 BY [REDACTED]

1 Q So, Mr. Budowich, we'll just do a few background questions.

2 A Okay.

3 Q Just what city and State do you currently live in?

4 A Sacramento, California.

5 Q And what's the highest educational level you achieved?

6 A Some college.

7 Q Okay. When did you finish the college that you went through, what year,
8 as best you can remember?

9 A 2012.

10 Q And you're how old?

11 A Thirty-two.

12 Q Now, how are you currently employed?

13 A I am self-employed, and then I am also on payroll for Save America PAC.

14 Q And how long have you been on the payroll for Save America PAC?

15 A Since July 22nd, I believe.

16 Mr. Bean. What year?

17 The Witness. Of 2021.

18 BY [REDACTED]:

19 Q Yeah. Thank you, Mr. Bean.

20 And in terms of self-employed, we've seen some documents about a company
21 that you started. Is that through Conservative Strategies?

22 A Correct.

23 Q All right. And how long have you had that business for?

24 A That business was filed in January.

25 Q Of --

1 A Of 2021, sorry.

2 Q No, you will get used to it. It's okay.

3 And what is the nature of the Conservative Strategies --

4 A Just real quick to stop there. I had Conservative Strategies, LLC, filed in
5 Virginia in 2020.

6 Q Okay.

7 A That closed in 2020, and refiled as Conservative Strategies, Inc., in California
8 at the start of 2021.

9 Q But the types of services you provided to clients --

10 A Same. Same.

11 Q Correct. And you will note here that we'll need to avoid talking over each
12 other, so --

13 A Sorry. Sorry.

14 Q No, it's okay. And what, as a general matter, are the services you provide
15 your clients through Conservative Strategies?

16 A Political consulting.

17 Q Prior to starting the business in 2020, in Virginia, what was your role or job
18 just prior to that?

19 A I was senior adviser to Donald J. Trump for President.

20 Q So the reelection campaign?

21 A Correct.

22 Q And when did that end?

23 A My employment ended on November 15, 2020.

24 Q And just as a general matter, what did your role involve doing while you
25 were the senior adviser, if you can describe it briefly?

1 A I was the chief of staff to Donald Trump, Jr., and a senior adviser on
2 campaign and political activity to Kimberly Guilfoyle.

3 Q As I understand it, was Ms. Guilfoyle the head of what was -- has been called
4 victory --

5 A Trump Victory Finance Committee.

6 Q Okay. And what was that?

7 A The finance committee associated with the campaign.

8 Q Okay. So there are going to be a lot of people whose names come up, I
9 think, during the day --

10 A Sure.

11 Q -- based on the documents you provided. So I think it's probably helpful at
12 that point and just to go through those names and just provide a brief synopsis of if you
13 know them and how you know them and just the nature of the relationship. Does that
14 make sense?

15 A It does.

16 Q So you've already explained Ms. Guilfoyle and how -- what the relationship
17 was there. When it comes to Donald Trump, Jr., did you have -- do you have any sort of
18 relationship, professional or otherwise, with him?

19 A Currently?

20 Q We can focus on 2020.

21 A I was his chief of staff.

22 Q The chief of staff. A gentleman named Arthur Schwartz, do you know him?

23 A I'm familiar with Arthur.

24 Q And how do you know Mr. Schwartz?

25 A Through Trump politics, through the Trump universe.

1 Q Okay. Did he have any sort of official advisory role with Donald Trump, Jr.,
2 at any point that you're aware of?

3 A What does official mean?

4 Q Whatever you take that to mean. Did -- was he employed by Mr. Trump
5 or --

6 A No, not to my knowledge.

7 Q Okay. Would he provide him advice to your knowledge or talk to him
8 about political -- to your knowledge?

9 A Yes.

10 Q Okay. Do you know a gentleman by the name of, I believe, Andy Surabian?

11 A Surabian.

12 Q And for the record, that's S-u-r-a-b as in boy, i-a-n. And how do you know
13 him?

14 A He was a roommate in Sacramento in 2014 timeframe, and he was a senior
15 adviser on the campaign.

16 Q The Trump campaign?

17 A Correct.

18 Q And this is the reelection campaign?

19 A Correct.

20 Q Caroline Wren, that's W-r-e-n, do you know her?

21 A I do.

22 Q How do you know her?

23 A She was a fundraiser for the reelection campaign in 2020.

24 Q And did she have an official employment relationship with Ms. Guilfoyle or --

25 A Not to my knowledge. She was employed by the campaign.

- 1 Q Katrina Pierson, do you know her?
- 2 A I do.
- 3 Q And how do you know her?
- 4 A So would you like me to explain --
- 5 Q Just a brief, yeah, just -- again, it's just to --
- 6 A Most recently, I knew her as a senior adviser to the reelection campaign.
- 7 Q And what role did she play on the reelection campaign, if you know?
- 8 A She ran coalitions.
- 9 Q What does that term mean?
- 10 A What does what term mean?
- 11 Q "Coalitions."
- 12 A Bringing together groups of people that identify in a certain way.
- 13 Q Sometimes folks call it grassroots. Does that sound right, or not necessarily
- 14 only grassroots?
- 15 A I'm okay with that description, sure.
- 16 Q All right. Justin Caporale?
- 17 A Caporale.
- 18 Q Okay. Do you know Mr. Caporale?
- 19 A I do.
- 20 Q And how do you know him?
- 21 A He is an event producer, rally producer.
- 22 Q Did he produce events for the reelection campaign for Mr. Trump?
- 23 A To my knowledge, he did.
- 24 Q Megan Powers?
- 25 A She was a staffer on the campaign.

- 1 Q Hannah Salem?
- 2 A She was a staffer on the campaign.
- 3 Q Maggie Mulvaney?
- 4 A Staffer on the campaign.
- 5 Q Sail Russo? That's R-u-s-s-o.
- 6 A He is -- he runs State Tea Party Express.
- 7 Q And how did you know Mr. Russo?
- 8 A I used to work for Sal in State Tea Party Express or Tea Party Express.
- 9 Q Based in California?
- 10 A Correct.
- 11 Q Charlie Kirk?
- 12 A President, CEO, something of Turning Point.
- 13 Q Do you know him?
- 14 A I do know Charlie.
- 15 Q And Tyler Bowyer, B-o-w-e-r (sic)?
- 16 A He is the CEO of Turning Point.
- 17 Q Okay. Do you know Mr. Bowyer?
- 18 A I do know him.
- 19 Q Adam Piper, P-i-p-e-r?
- 20 A I don't believe I know Adam Piper.
- 21 Q Amy and Kylie Kremer, that's K-r-e-m-e-r, Amy is the mother, Kylie is the
22 daughter. Do you know them?
- 23 A I do.
- 24 Q And how do you know them?
- 25 A Amy was the chairwoman of Tea Party Express, which I was employed until

1 2017, I believe.

2 Q And Kylie you got to know through Amy?

3 A Correct. She was -- they come together.

4 Q All right. And at least in the -- a timeframe we're going to be talking about,
5 they were part of Women for America First?

6 A That's what I understand.

7 Q Do you know a woman by the name of Cindy Chafian, C-h-a-f-i-a-n?

8 A I do not.

9 Q Ali Alexander, otherwise known as Ali Akbar, A-k-b-a-r?

10 A I'm familiar with him.

11 Q Do you know him personally?

12 A I do not.

13 Q Have you ever met him?

14 A Possibly in a passing scenario.

15 Q So familiar with him how, as a general matter?

16 A For instance, the passing scenario would've been at like CPAC, the
17 conservative gathering held once a year that he usually holds events at.

18 Q Alex Jones?

19 A I'm familiar with him. I don't know him personally.

20 Q And I'll note for the record that Mr. Aguilar has joined the Webex.

21 A Thank you.

22 Q Roger Stone?

23 A Familiar with him. I watched the documentary.

24 Q But don't know him personally?

25 A I do not.

1 Q Do you know Max Miller?

2 A I do.

3 Q How do you know Mr. Miller?

4 A Currently, he's a client.

5 Q During the time we'll talk about, primarily December of 2020, and January
6 of 2021, do you know what he was doing at that time in terms of an official employment
7 role?

8 A At that period, I didn't know Max Miller.

9 Q You didn't. When did you meet him?

10 A Subsequently when he was looking for running for Congress.

11 Q Do you know Robert, otherwise known as Bobby, Peede, that's P-e-e-d-e?

12 A Yes.

13 Q And how do you know Mr. Peede?

14 A He was involved in production of rallies on the campaign.

15 Q For the reelection campaign?

16 A Correct.

17 Q Do you know Brian Jack?

18 A I do.

19 Q And how do you know Mr. Jack?

20 A He was the political director for the President and the White House.

21 Q So it would just be helpful before we get into the, what I'll call the nuts and
22 bolts of the rally organization that we'll talk about, just to frame the timeline around
23 January 6th, okay?

24 A Okay.

25 Q So were you -- were you aware after the election, November 3rd of 2020, of

1 what I'll call just the Stop the Steal coalition movement across the country?

2 A Was I aware of it?

3 Q Yes.

4 A Yes.

5 Q Okay. Did you participate in any of the events that happened nationwide
6 that were put on by members of the Stop the Steal coalition?

7 A How are you defining the members?

8 Q Whatever you mean -- members. Okay. Fair enough. The Kremers, for
9 instance, the Women for America First did bus stops and rallies at different places
10 throughout the country. Did you participate with them in any of those?

11 A No.

12 Q Are there --

13 A Other than January 6th rally at the Ellipse.

14 Q How about Mr. Ali Alexander and the people that he worked with?

15 A No.

16 Q Were there any that you can think of that you did work with before
17 January 6th on events of that nature?

18 A Before January 6th but after November 3rd?

19 Q Correct, as best you can remember.

20 A No, as best that I -- as -- as best as I can remember.

21 Q Are you aware that there were Stop the Steal protests in Washington, D.C.
22 respectively on November 12th of 2020 and -- excuse me, November 14th and
23 December 12th of 2020?

24 A Are you asking me if I --

25 Q At the time.

1 A -- remember them?

2 Q Yes.

3 A I'm sure I was aware of them, but I don't recall them.

4 Q Okay. Did you attend either of those events?

5 A I did not.

6 Q All right. Were you involved at all in helping put those on?

7 A I was not.

8 Q Now, if you look at -- in your binder at exhibit 2, you're going to see a
9 collection of tweets by former President Trump taken from an archive. It's just
10 a -- dating from January 6th, 2021, and going back to December, I believe, 18th of 2020.

11 A Okay.

12 Q All right. So if you go to the very last page of that exhibit, you will see
13 highlighted in the middle a tweet that I'll read, December 19, 2020, at 1:42 a.m., "Peter
14 Navarro," N-a-v-a-r-r-o," releases 36-page report alleging election fraud, 'more than
15 sufficient,' closed quote, to swing victory to Trump. A great report by Peter.
16 Statistically impossible to have lost the 2020 election. Big protest in D.C. on January 6th.
17 Be there. Will be wild, exclamation point." Do you see that tweet?

18 A I do.

19 Q If I refer to that throughout the day, if it comes up, I'll just call it the wild
20 protest tweet, but that's what I'm talking about.

21 A Okay.

22 Q At the time, do you remember seeing that tweet come out?

23 A I don't remember.

24 Q Are you familiar with it though now looking at?

25 A I'm familiar with it now.

1 Q Do you -- at the time, did you have any -- did you know that this tweet was
2 going to be released or what the President was referring to?

3 A No.

4 Q Now, were you aware at that time, on December 19th of 2020, that the
5 State electors as part of the electoral college had already met to vote in their respective
6 States?

7 A Say that again.

8 Q Were you aware at that time, on December 19th, that the electors from the
9 electoral college had met to cast their votes and that those votes would be certified on
10 January 6th, if you remember?

11 A I don't recall.

12 Q Are you familiar with that general process?

13 A Yes.

14 Q Okay. Now, before -- after -- in mid-December and up to January 6th, what
15 was your view, if you remember, about whether Vice President Pence had the authority
16 to not certify the electors?

17 A I don't recall.

18 Q Did you know at the -- what was your view at that time, in mid-December up
19 to January 6th, about, practically speaking, whether there were enough votes in Congress
20 not to certify the election for President?

21 A I don't recall.

22 Q Now, is it right that Caroline Wren brought you in to helping on the
23 January 6th rally within a few days at least of this tweet coming out from the President?
24 Does that sound about right?

25 A Yes.

1 Q Okay. Do you remember a particular day that she brought you in to --

2 A I don't.

3 Q Okay. Certainly before the end of the year, of 2020?

4 A Yes.

5 Q Now, during this time when you were working on the January 6th rally to
6 help, where were you physically located? Do you remember?

7 A Sacramento.

8 Q Did you ever come to D.C.?

9 A No.

10 Q Did you ever leave Sacramento?

11 A Yes.

12 Q Stayed within California?

13 A Nevada.

14 Q Did you stop working on the rally at any point between the time when
15 Ms. Wren asked you to start helping and when the rally helped -- took place on the 6th?

16 A Yes.

17 Q Do you remember approximately, even if it was just a matter of days, or
18 what would you say?

19 A It was the Saturday before the rally.

20 Q Okay. I think we'll get to that. So roughly, do you remember that
21 January 6th was a Wednesday?

22 A I don't, but I trust you.

23 Q Okay. So that Saturday would've been January 2nd. Does that sound
24 about right?

25 A (Nonverbal response.)

1 Q Yeah, okay.

2 A Yes.

3 Q Now, at a high level, is it fair to say from reviewing your documents that the
4 role you played regarding that rally was to help in crowd building?

5 A Raising awareness for the rally.

6 Q All right. The term "crowd building" is used in your documents, I think by
7 you and others. Do you recall that?

8 A I don't, but I'm sure it's true.

9 Q All right. And just, I know it sounds like a simple question, but how do you
10 describe crowd building and what that means to you?

11 A Raising an awareness for the rally for attendees to show up.

12 Q In other words, to generate interest so people come?

13 A Yes.

14 Q Now, is it fair there were -- I guess what I'll do is I'll describe what seems to
15 be a few buckets of the types of work you did as part of that crowd building.

16 A Okay.

17 Q Fair to say, one of those was working with Sal Russo and Tea Party Express?

18 A State Tea Party Express.

19 Q Excuse me, yes. But that's an arm of the Tea Party Express?

20 A It's a separate organization.

21 Q All right. But affiliated, Mr. Russo is a part of both?

22 A Correct.

23 Q All right. Also, it looks like you helped to some extent on the
24 TrumpMarch.com web design, which was the website for Women for America First.
25 Does that sound right?

1 A I don't recall that.

2 Q We'll get to it.

3 A Okay.

4 Q Coordinating buses to bring attendees to the rally, to include working with
5 Turning Point on that?

6 A I recall linking Tyler with Megan, who was -- Megan was involved in the rally
7 production and entry and Tyler had buses.

8 Q And Tyler is Tyler Bowyer?

9 A Tyler with Turning Point, correct.

10 Q I might be pronouncing it wrong. Is it --

11 A Bow -- I think it's Bowyer.

12 Q All right. Thank you. So in the course of your work across all the buckets
13 of the work you did for January 6th, I'll just ask you, did you, at that time, communicate
14 directly with President Trump?

15 A No.

16 Q Did you communicate with anyone who, at that time, was a member of the
17 White House staff, to your knowledge?

18 A I don't recall.

19 Q Did you communicate with anyone who was still on the staff of the Trump
20 reelection campaign about the events of January 6th?

21 A I don't know, and I say that only because I don't know who was still being
22 paid or not paid.

23 Q Fair enough. Did you communicate directly, again, about the events of
24 January 6th with any Members or Members-elect of the United States Congress?

25 A I don't believe I did.

1 Q How about with the staff of any Members or Members-elect in the United
2 States Congress?

3 A Not that I recall, but I don't believe I did.

4 Q So before we start talking about those buckets of work and the particulars
5 for each, I just want to talk to you about the process that we -- you went through to
6 collect documents to produce those for the committee.

7 A Okay.

8 Q So at the time that you were working on the January 6th event, did you have
9 a computer that you were using?

10 A Yes, I had a laptop.

11 Q All right. Did you search that laptop with your lawyers to look for
12 responsive documents?

13 A Yes.

14 Q It appears from your documents you had a single email address you were
15 using, [REDACTED]. Is that right?

16 A Correct.

17 Q Was there any other email address you used?

18 A I don't believe so.

19 Q So in terms of looking for responsive documents for the subpoena, did you
20 look through your email?

21 A Yes.

22 Q Now, I think it's right that you had an iPhone that you were using at the
23 time?

24 A Correct.

25 Q And the last four digits, [REDACTED]?

- 1 A Correct.
- 2 Q Did you look through the texts or iChats that you sent through your phone?
- 3 A I did.
- 4 Q Did you use any messaging apps other than texts on your phone to
5 communicate with people about the events of January 6th?
- 6 A I don't believe I did.
- 7 Q So apps like Signal?
- 8 A I'm familiar. I don't believe I did, no.
- 9 Q Do you -- did you look to see whether you had any?
- 10 A I don't believe so, no.
- 11 Q Do you use Signal?
- 12 A Not really, no. I have a rule against it.
- 13 Q How about the program WhatsApp?
- 14 A No.
- 15 Q Telegram?
- 16 A I -- I -- these apps are downloaded on my phone.
- 17 Q Sure.
- 18 A But I don't believe I used those apps during this time.
- 19 Q All right. I just have to ask.
- 20 A Yeah. No, I understand.
- 21 Q So the app Parlor?
- 22 A No.
- 23 Q Any other type of, say on your phone at that time, where you could message
24 folks?
- 25 A I primarily or entirely use iMessage, or the just normal text messaging

1 feature on your phone.

2 Q Understood. So let's start with Ms. Wren and Ms. Julie Fancelli, which is,
3 for the record, F-a-n-c-e-l-l-i. Do you know Ms. Fancelli?

4 A I do not.

5 Q When was the first time you became aware of her, if you remember?

6 A Around the period in question.

7 Q And at a high level, what did you understand her role in this to be?

8 A She was a donor to the President's reelection campaign.

9 Q And is it a donor that Ms. Wren was working with?

10 A To my understanding.

11 Q Do you know how Ms. Wren came to work with Ms. Fancelli? Did she ever
12 tell you?

13 A I -- I don't believe so. Not that I recall.

14 Q Do you know whether or not Ms. Guilfoyle had ever interacted with
15 Ms. Fancelli?

16 A No personal knowledge, no.

17 Q Now, if we look at -- it'll be helpful to look through some of the documents
18 to lay down the timeframe. If you turn to Tab 8, this is a document you produced. It's
19 labeled with the Bates No. 1584, and it's a text message chain. This is the format we
20 received from you. Are these texts taken from your cell phone, Mr. Budowich?

21 A I believe these texts were taken from my laptop.

22 Q From your laptop, all right. From an iCloud backup or something to that
23 effect?

24 A Don't know. They found -- it was on my laptop.

25 Q Okay. Now, if you will go through, and I'll just direct you as best I can to

1 date and time, okay --

2 A Okay.

3 Q -- just to pin it down. But if you -- at the top, you're going to see, on that
4 first page, do you see that the -- it says display names in the top left? It's the third row
5 down in that box?

6 A Yep. Yes.

7 Q All right. And there's a number there. It looks to be a phone number,
8 [REDACTED]. Do you know, as you look at that number, who that is?

9 A No.

10 Q If I told you that's Katrina Pierson's phone number, could you tell by looking
11 at the text that that makes sense?

12 A I don't recall, but if you're telling me that, I don't think you're lying to me.

13 Q Well, how about this, this might help jog your memory. If you turn to the
14 second page of that exhibit, and you go down to a message that you sent that's in blue on
15 December 22, 2020, at 11:35 p.m., do you see the message, "Who is doing the Jan. 6th
16 rally"?

17 A Yes.

18 Q All right. And do you see the response comes back to you with a Twitter
19 handle for Amy Kremer?

20 A I see that.

21 Q Do you remember sending this message to Ms. Pierson and her telling you it
22 was the Kremers?

23 A I don't.

24 Q All right. Do you remember why on December 22, 2020, you were asking
25 who was doing the rally on the 6th?

1 A I don't recall.

2 Q Could it have been related to Ms. Wren telling you about Ms. Fancelli?

3 A I don't recall.

4 Q Did you have any other reason to be focused on the January 6th rally that
5 you can remember at that time?

6 A No.

7 Q If -- right below there, on December 26th of 2020, at 7:09 p.m., you write,
8 "Call me. Have big money for the rally on the" -- and then another message that says
9 "6th." When you talk about big money, what are you referring to?

10 A I don't recall.

11 Q Did you know anybody else with big money related to the rally other than
12 Ms. Fancelli?

13 A I don't believe I knew Ms. Fancelli at this time.

14 Q Or know of Ms. Fancelli?

15 A If this references anything, it would be in reference to Caroline Wren, not a
16 specific donor.

17 Q This might help then. Why don't we turn to Tab 7 in your binder. These
18 are text messages, I'll tell you, produced by Ms. Caroline Wren. And if you see at the
19 bottom there's a Bates number on that page. It is REVU and the number 724. Do you
20 see that at the bottom right?

21 A Oh, yes.

22 Q All right.

23 A Well --

24 Q And your name and picture are at the top of the text chain. Do you see
25 that on the first page?

1 A Sorry, I'm on the wrong page. Yes.

2 Q Okay. And so, in blue would be Ms. Wren's messages to you, and in gray
3 would be your responses, okay?

4 A Okay. Understood.

5 Q All right. And you can match some of these up with the messages that you
6 produced with Ms. Wren, although your productions didn't cover the entire time. You
7 can match certain portions of these up. So if you'd like to do that, we can show you,
8 but --

9 A Okay.

10 Q -- I'll represent to you these are Ms. Wren's texts with you.

11 A Okay.

12 Q Now, do you see that at the -- on the first page of that exhibit --

13 A Oh, sorry, I'm way behind.

14 Q No, that's okay. Like I said, you can take the time to familiarize yourself
15 with documents. But if you see on that first page underneath your name and picture,
16 there's the date Saturday, December 26th at 11:25 a.m. She redacted certain personal
17 non-related information so there's a block redacted. But then following there it says,
18 "I'm at Julie Fancelli's. Guess what the budget is she just gave me for our bus project?
19 You won't guess. \$3 million." And then you do the LOL. Do you remember now her
20 telling you that Ms. Fancelli was giving \$3 million?

21 A I see it here.

22 Q Okay. And does Saturday, December 26th, sound about right, based on
23 your knowledge of your involvement in these?

24 A Yes.

25 Q All right. Now, she refers to the budget for our bus project. At that time,

1 do you know what she was referring to, "our bus project"?

2 A I don't.

3 Q You don't have any recollection?

4 A (Nonverbal response.)

5 Q Going forward, what did you --

6 A Sorry, no.

7 Q Going forward, what did you understand that to mean?

8 A The raising awareness, the crowd-building aspect of the rally.

9 Q Now, I can -- do you believe that you would have talked to Ms. Wren about
10 Ms. Fancelli in the January 6th event prior to December 26th?

11 A I don't recall.

12 Q Certainly, she seems to suggest some familiarity by calling it "our bus
13 project" at that time. Do you agree with that?

14 A Yes.

15 Q Okay. What do you remember Ms. Wren telling you, at least in the initial
16 stages, about how she came to have discussions with Ms. Fancelli about the January 6th
17 rally?

18 A I don't recall.

19 Q Did Ms. Wren tell you whether she, Ms. Wren, brought up the idea with
20 Ms. Fancelli?

21 A I don't recall.

22 Q Did Ms. Wren ever relay to you what Ms. Fancelli -- what prompted
23 Ms. Fancelli's interest in supporting the rally?

24 A Not to -- not to my memory, no.

25 Q Did the name Alex Jones ever come up in the conversation with Ms. Wren

1 about Ms. Fancelli?

2 A Not that I recall.

3 Q Did she explain to you, Ms. Wren, what Ms. Fancelli's vision, such as it was,
4 was for the rally on the 6th, what she hoped to have accomplished with the money she
5 was giving?

6 A Not that I recall.

7 Q Did Ms. Wren herself have any experience, to your knowledge, of organizing
8 events like the rally on January 6th?

9 A Not to my knowledge. I mean, a rally with that many people, no.

10 Q Why was Ms. Wren talking with you about the rally?

11 A I -- I don't know.

12 Q You don't have any reason to know why she came to you and told you about
13 it?

14 A No, I mean, other than we talked -- would -- at this period, talked frequently.

15 Q But particularly about the rally and calling it "our bus project," why is she
16 talking about it with you like that?

17 A I -- I don't know.

18 Q Well, what sort of background or expertise did you have in helping to put on
19 a rally like this?

20 A There was a period where -- so Tea Party Express is known for bus tours, and
21 we did bus tours all across the country. And she understood that to mean like putting
22 people on buses to bus them in, which is not what we did. So in her mind, I was the bus
23 guy, but it was a different kind of concept.

24 Q Okay. So you see here that Ms. Wren produced texts from -- starting at
25 least with December 26th with you. If we move to exhibit 3 in your binder, if you could

1 turn to that, if you look at the bottom right-hand corner, you'll see that it's marked by you
2 as -- with Bates No. 1677.

3 A Okay.

4 Q And on the front page of this, you see at the top, and this is a text message
5 chain that you produced, it says the display name is -- and the phone number is [REDACTED],
6 excuse me, [REDACTED], and then your email address. Do you understand that [REDACTED]
7 number to be Ms. Caroline Wren?

8 A I don't, but --

9 Q If you note here, the first text that's shown here is December 29 of 2020 at
10 4:00 p.m., sent by you, saying, "Can you please check in to get an ETA on wires." Do you
11 know what that would've been in relation to?

12 A I don't.

13 Q Do you know why you didn't produce text messages that predated
14 December 28th of 2020 with Ms. Wren?

15 A I don't.

16 Q What search did you personally do to look through your materials to see
17 what you had?

18 A I didn't personally search.

19 Q Have you reviewed the documents produced to see if they're complete?

20 A What do you mean?

21 Q Have you looked through the documents you produced to see if they
22 completely capture everything you have related to the requests in the subpoena?

23 Mr. Bean. I'm going to object on grounds of attorney-client privilege. Any
24 documents he looked at were in my presence.

25 [REDACTED]. It's not privilege whether he reviewed documents to see if they're

1 complete, as his obligation is personally to produce the documents.

2 Mr. Bean. As we said to you, his systems were imaged and then produced to us,
3 which we then -- we reviewed for responsiveness.

4 BY [REDACTED]

5 Q Right. So if we look at Tab 7 where Ms. Wren text you to include that the
6 bus project, Mr. Budowich, that's about the rally on the 6th, right?

7 A Right.

8 Q All right. So that's within the subpoena request, which is about any
9 documents concerning the rally, right?

10 A Correct.

11 Q All right. So, again, asking why, to your knowledge, this wasn't produced to
12 us?

13 A I don't know, to my knowledge.

14 Q All right. You still have your computer with all your documents on it?

15 A I do.

16 Q Now, when Ms. Wren tells you that it's \$3 million, you do the LOL, lots of
17 them. You see that?

18 A Yes. We're back to 7.

19 Q And you said -- we're on 3 -- on 7 still, yes. And you say, "Probably could do
20 it for 3." Seems to be a bit of a joke that \$3 million should be able to cover the project.
21 Is that fair?

22 A Yes.

23 Q Okay. What was your reaction to knowing that there was \$3 million to help
24 put on this bus project and what that meant for the efforts you and Ms. Wren would be
25 undertaking?

1 A Say that again.

2 Q Again, \$3 million, how did that affect your perception of the type of work
3 you would be doing and the scale of the work for the rally?

4 A I don't know that you could spend \$3 million on a rally.

5 Q Okay. Do you know how much was eventually spent?

6 A I do not.

7 Q Do you have a sense of the amount?

8 A I do not.

9 Q Now, you ultimately did agree to help and you did work on the planning for
10 the rally, right?

11 A In conjunction with State Tea Party Express.

12 Q All right. Why did you agree to do this?

13 A Because I believed in the cause of celebrating the President's
14 accomplishments.

15 Q And was it also to be paid for your efforts?

16 A Did I get involved to get paid?

17 Q Well, how about this, did you, at the front end, tell Ms. Wren that you
18 expected to be paid for your efforts?

19 A Correct.

20 Q All right. And did you negotiate a payment upfront, or what that would be?

21 A With her, I don't recall.

22 Q I think you're referring to then you did negotiate it with Sal Russo?

23 A Correct.

24 Q So if you stay on Tab 7, and you turn to the second page, it looks like you're
25 already there, still on Saturday, December 26th, in the afternoon at 4:39, you write to

1 Ms. Wren, "Spoke with Justin. He's putting together a production budget." What
2 Justin are you referring to there?

3 A Caporale.

4 Q And you say, "He's putting together a production budget." What were you
5 referring to?

6 A For the rally.

7 Q And how did you know to get in touch with Mr. Caporale?

8 A I know him to be responsible or involved with planning rallies.

9 Q And particularly with regard to President Trump?

10 A Trump rallies.

11 Q And you said, dot, dot, dot, "...he's already talking to Kylie and some other
12 chick." Is that Kylie Kremer?

13 A I don't recall, but I'm going to assume that it was.

14 Q And "some other chick," do you know who you were referring to?

15 A That is -- no.

16 Q You then follow up by saying, "I also sent you a budget for TPX crowd
17 building." What's TPX?

18 A Tea Party Express.

19 Q So I know you said State Tea Party Express --

20 A Correct.

21 Q -- earlier, but those are related entities?

22 A Correct. I think it was shorthand.

23 Mr. Bean. Make sure you don't overlap. Just take your time.

24 BY [REDACTED]:

25 Q Now, at that time, what did you understand the goal of your crowd building

1 efforts to be, just a particular number you were trying to hit or a level of awareness?

2 A I don't -- there was never a stated goal.

3 Q So if we look at exhibit 3, if you can swing back to that, again, text messages
4 with Ms. Wren. If you look at the bottom right and go to the Bates No. 1683 --

5 A Okay.

6 Q -- at the very bottom, you will see a message that you send at December 30,
7 2020, at 4:24 p.m. Do you see that at the bottom?

8 A I do.

9 Q And you start that message off with the acronym CW. What does that
10 mean?

11 A Caroline Wren.

12 Q All right. And I'll just read it and then we'll -- I'll ask. "You signed off on
13 the plan. It was always a one-page RSVP form to capture data. The goal was always
14 straight crowd building. If you wanted a full-on website, I would've told you to have
15 Charlie do it." Who is Charlie?

16 A Kirk.

17 Q Going back to this, "He has a team on website people. But I also think
18 you're 100 percent wrong in needing to get a website." Of course, the exhibit is right in
19 the middle of it. I'll flip back to 7. But do you see after the exhibit label right in the
20 middle the words rally, huge, and a website doesn't add any value to that goal? And I'll
21 just stop there. Do you see that?

22 A I do.

23 Q All right. So we might have to come back. I could find it in your -- in the
24 ones with Ms. Wren. But if I tell you that the goal was to make the rally huge, does that
25 sound right to you or that's the goal of any crowd-building effort?

1 A Correct.

2 Q All right. As you were talking to Ms. Wren about your involvement in the
3 crowd-building efforts, did you draw any sort of boundaries about the type of work you
4 were willing to do or not do on this type of project?

5 A I -- my involvement was to raise awareness for this rally. The
6 advertisements had to do with celebrating the President's accomplishments.

7 Q All right. And what do you mean by celebrating his accomplishments?

8 A That it was a positive rally to celebrate what he accomplished. The radio
9 ads had in it language, like, come celebrate the President's accomplishments, he cut
10 taxes, negotiated Middle East peace, that sort of thing.

11 Q And celebrating one's accomplishments, is that because you understood
12 the -- his presidency to be coming to an end at that time?

13 A Yes.

14 Q And why did you have to tell Ms. Wren that that was what you were working
15 on as opposed to what? If you will work on celebrating his accomplishments, what were
16 you not willing to work on?

17 A I don't know that it's an either or.

18 Q It wasn't. So at the time that Ms. Wren told you about this event, did she
19 describe it to you as celebrating his accomplishments?

20 A I don't recall.

21 Q But is that what you understood it to be?

22 A That's what I understood my involvement to be.

23 Q Now, we looked at the President's December 19th tweet earlier at exhibit 2.
24 Do you remember looking at that?

25 A Yes.

1 Q And what he said there was, "Big protest in D.C. on January 6th. Be there.
2 Will be wild." Do you remember seeing that?

3 A Yes.

4 Q So the President's tweet didn't mention celebrating his accomplishments,
5 did it?

6 A It did not.

7 Q Did you ever know the President to tweet that January 6th, before the event
8 happened, that the rally was to celebrate his accomplishments?

9 A I don't recall.

10 Q Now, you were involved to help crowd building, I think you said, because
11 Ms. Wren thought of you as the bus guy. Did you know at the time in those initial -- the
12 initial day or soon thereafter whether Ms. Wren planned to involve any other
13 organizations in helping to put on this rally on the 6th?

14 A I don't. I don't recall.

15 Q But she ultimately did involve other organizations?

16 A Yes.

17 Q All right. We'll talk about those. When she first talked to you, that is
18 when Ms. Wren first told you about the rally on the 6th and the work you would be
19 doing, did you have an expectation that the White House would be involved in that?

20 A Say that again. Sorry.

21 Q When Ms. Wren first told you --

22 Mr. Bean. You don't have to apologize.

23 BY [REDACTED]:

24 Q No, you don't -- yeah, no, that's what -- that's the point of asking.

25 At the time that Ms. Wren told you about Ms. Fancelli and the money and putting

1 on the rally, did she tell you, Ms. Wren, that the White House would be involved in
2 putting on the event?

3 A I don't recall.

4 Q When do you remember first learning that the President would be speaking
5 at the event?

6 A A specific -- I don't recall a specific time.

7 Q All right. In relation to when you first started working, when did you first
8 get a sense that the President would be speaking at the event?

9 A I don't recall.

10 Q Was it soon?

11 Mr. Bean. Can you clarify that?

12 The Witness. Yeah.

13 Mr. Bean. I don't understand it. When you say soon, in time, December or
14 January, close to January 6th or -- I'm sorry, but --

15 BY [REDACTED]:

16 Q No, it's fine. So we're talking about a 2-week window, right?

17 A Correct.

18 Q So from December 26 to January 6th?

19 A The second half, not the first half.

20 Q Is it fair to say before the second half, in other words, the second week
21 before that, there was a sense that he might come to speak at the rally, just wasn't sure?

22 A That's fair.

23 Q Do you know who was speaking, if at all, on behalf of the rally organizers
24 with the White House to determine whether the President would be coming to speak?

25 A I didn't have any firsthand knowledge of who was.

1 Q All right. As you sit here today and looking back, are you aware that
2 Katrina Pierson did speak with the White House and President Trump about his
3 involvement in the rally?

4 A I've seen reporting on that, yes.

5 Q All right. Are you aware of anybody else, from your own firsthand
6 knowledge, about who was doing that on behalf of the organizers of the rally?

7 A I don't believe I have any firsthand knowledge on that.

8 Q Now, if we look back at exhibit 2, which is the Twitter archive --

9 A Okay.

10 Q -- and if you go to the, I'll call the next-to-last page, look for a tweet on
11 December 27, 2020, at 5:51 p.m. Do you see that highlighted there?

12 A Got it.

13 Q Okay. So this is the day after Ms. Wren tells you about the \$3 million, and
14 the President says -- tweets out, "See you in Washington, D.C. on January 6th. Don't
15 miss it. Information to follow." Do you know what prompted that tweet?

16 A I do not.

17 Q Now, did you have any conversations at this time, when -- December 26th,
18 27th, the first few days you're involved, with Donald Trump, Jr., about the rally?

19 A I don't recall, but I don't believe so.

20 Q How about with Ms. Guilfoyle?

21 A I don't believe so.

22 Q Did Ms. Wren give you the impression that Ms. Guilfoyle was involved at all
23 in planning of the rally at that time?

24 A No.

25 Q Did you ever, in your work on the rally, get the impression that Ms. Guilfoyle

1 was involved in working on planning the rally?

2 A No.

3 Q How about with Donald Trump, Jr.?

4 A No.

5 Q So why don't we take a minute to talk about Tea Party Express, but I'm going
6 to stop there and see if anybody who is on the Webex has any questions to this point?

7 Okay. I don't hear any, so we'll just keep moving. So when it comes to -- if I say
8 Tea Party Express --

9 A Understood.

10 Q -- do you want me to be more particular, or is it -- you understand what I'm
11 talking about?

12 A I do.

13 Q Okay. So why did you involve Tea Party Express as an organization you had
14 worked with on the January 6th event?

15 A It was an organization I knew and trusted.

16 Q And capable of doing the type of work you needed to get done to get people
17 to the rally?

18 A Correct.

19 Q And what type of work were you looking to Tea Party Express to do to help
20 you crowd build?

21 A Advertising.

22 Q What type --

23 A Paid advertising.

24 Q And what type, in what medium or media?

25 A What ended up happening was radio and digital advertising.

1 Q Now, from the review of your documents, tell me if it's wrong, but it looks
2 like you initially proposed to Ms. Wren a \$500,000 budget for Tea Party Express to do this
3 advertising. Does that sound right?

4 A I don't recall, but if it's in here then that --

5 Q All right. Well, let's just look to get a sense of magnitude.

6 A Okay. Yeah.

7 Q So exhibit 44. All right. And you'll see at the bottom it's an email chain,
8 and it's marked by you with the Bates No. 2, the first page is, and it's an email exchange
9 between you and Ms. Wren. And at the top of that email exchange on December 26th
10 at 5:32 p.m., it appears that you send a budget to Ms. Wren for \$500,000. Do you see
11 that?

12 A I do.

13 Q And that mirrors up with the text messages we just reviewed earlier, Tab 7,
14 where on December 26th you said, I'll send you a Tea Party Express budget. Is that
15 right?

16 A Yes.

17 Q Okay. Now, did it end up being \$500,000 that Ms. Wren directed to Tea
18 Party Express to spend on this advertising, to your knowledge?

19 A To my knowledge, no.

20 Q Do you know about the magnitude that -- the amount of money that got
21 spent by Tea Party Express?

22 A My understanding, it was roughly \$200,000.

23 Q And as part of that, it sounds like -- it appears that you were paid through
24 Conservative Strategies \$15,000. Does that sound right?

25 A Conservative Strategies was paid \$15,000, yes.

1 Q And Mr. Russo would've been paid too for his time and effort?

2 A Yes.

3 Q Now, in terms of the scope of services, this is the budget you provide, but I
4 think it's helpful to look at exhibit 47, if you turn to that in your binder. And this is a
5 document you produced, an email chain, and at the bottom it's Bates No. 1125. Do you
6 see that?

7 A Yes.

8 Q All right. And in the middle is an email on January 3rd of 2021 at 6:57 p.m.
9 that you write. And if you turn the page to the back, you will see that your email is in
10 response to Ms. Wren writing to you and others saying that she's, quote, "connecting
11 everyone regarding the Tea Party Express crowd building efforts. For \$200,000, we
12 should be able to do some pretty significant pushes." Do you see that?

13 A Yes.

14 Q And then your response on that first page, it says, "The plan remains the
15 same" -- this is in the first paragraph -- "as what you requested/approved last week.
16 Digital includes pre-roll, display, and text. 1st text went out Friday. 2nd goes out
17 today. 3rd on Tuesday a.m. Rest of spend is on radio as requested."

18 Does that fairly capture the efforts that Tea Party Express did to help crowd build
19 for the January 6th event?

20 A Yes.

21 Q Now, when you talk to Caroline, you say, the plan remains the same as what
22 you requested and approved. Was Caroline making the decisions so far as it went for
23 the crowd building, to your knowledge, for January 6th?

24 A When you say making decisions, what does that mean?

25 Q Was she the person you had to get approval from to do the work that you

1 did?

2 A She was the fundraising -- fundraiser who was directing funds. So to raise
3 the money she was, to my understanding -- I don't know if she was making the decisions
4 or somebody above her.

5 Q Fair enough. Did you ever talk to anyone other than Ms. Wren --

6 A I did not.

7 Q -- about getting approval for your work?

8 A I did not.

9 Q Did she ever, at any point, talk to you about the particular requests of
10 Ms. Fancelli or anyone else to whom she was reporting to for the direction she was giving
11 to build the crowd for the 6th?

12 A Not that I recall.

13 Q You refer in here in this email to radio advertising, and you talked about it
14 earlier in your testimony.

15 A Uh-huh.

16 Q That radio advertising, fair to say that Kay Rivoli, R-i-v-o-l-i, cut a few
17 different ads to put on the radio to advertise?

18 A I believe it was only one, but, yes.

19 Q Did you help draft the script for that?

20 A I did.

21 Q And then the digital, you call it pre-roll, display, and text, that digital effort,
22 so everything other than the radio, is it right that went through a company call Go BIG
23 Media?

24 A Yes.

25 Q And if we look at exhibit 52, if you turn in your binder, in a document you

1 produced, the first page is Bates No. 1159, it's an email chain. The initial email is an
2 invoice from Go BIG Media sent to you that you then forward to Sal Russo. Do you see
3 that?

4 A I do.

5 Q In that invoice, you can flip through the pages of this email exchange, but
6 the top line number of the invoice is \$109,479. Do you see that?

7 A I do.

8 Q Is that the total amount, to your knowledge, that Go BIG was paid for its
9 efforts?

10 A That sounds right.

11 Q All right. And so this invoice captures the work they did or that they
12 invoiced?

13 A Yes.

14 Q All right. So if we go through that on the second page, the first item is
15 listed as media production, and it's video production and HTML design. So to your
16 knowledge, did they create at least a couple videos, one or more, to help promote?

17 A To my memory, yes.

18 Q Okay. Did you help in creating those videos?

19 A Yes.

20 Q The next one is a website -- excuse me, web design, under that website.

21 A Uh-huh.

22 Q Did they, Go BIG Media, create a website?

23 A A splash page.

24 Q Was that called RallyForTrump.Com, to your memory?

25 A Yes.

1 Q The next entry is service, and under that is listed the term "data." What
2 does that refer to, to your knowledge?

3 A I don't recall.

4 Q The next for \$70,000 is what they call digital media buy, pre-roll plus CTV
5 media buy. Do you know what that means, those words?

6 A A pre-roll is a video that runs before a video that you're watching online.

7 Q And CTV media buy, what does that mean?

8 A I don't know what that means.

9 Q The next is a \$30,000 entry, and it's labeled as service and then P2P texting
10 campaign. Do you know what that is?

11 A I believe P2P stands for person-to-person texting, so it's the texting
12 promotion.

13 Q So would've been in your email we looked at earlier, Tab 47, when you were
14 describing the three texts that went out or were planned to go out. Is that right?

15 A Yes.

16 Q All right. And in that email, but to your memory, do you remember that
17 roughly there was an area around the District of Columbia, or D.C., that it was targeted
18 for the text to try to get people who were relatively close. Is that fair?

19 A Yes.

20 Q And do you know where the text numbers came from, who the people were
21 that were being reached?

22 A The request was to identify high-propensity Trump rally goers. So you
23 usually can pull a list like that of somebody that's attended a rally before or expressed
24 interest in a rally before.

25 Q And if we flip back to -- and thanks for keeping up with the flipping. But if

1 you flip back to exhibit 47, and you go to the first page of that email.

2 A Okay.

3 Q You see at the top an email from Megan Powers, who you talked about
4 earlier, writing on January 3rd at 9:18 p.m., and she, you know, says many things but I
5 want to focus your attention on the second and third paragraphs. And she says, "As for
6 additional crowd raising, MCI can do GOTV calls to PA/WV/NC/VA. They can formulate
7 it around a budget." Now, did you -- did you know what MCI was?

1

2 [10:57 a.m.]

3 The Witness. I did not.

4 BY [REDACTED]:

5 Q Did you have any involvement with whether NCI did any efforts on crowd
6 building?

7 A Not to my knowledge, no.

8 Q The next that Ms. Powers says is, "Gary Kobe's company does P2P texts. I
9 spoke to him briefly today, and he said they could rent a lift."

10 Do you know who Gary Kobe is?

11 A I do.

12 Q And who is he?

13 A He is the -- he was the -- I don't know what his title was, but the digital guy
14 for the reelection campaign of President Trump.

15 Q To your knowledge, did he do anything in relation to helping to build the
16 crowd for January 6th?

17 A Not to my knowledge.

18 Q Now, the Rally for Trump website, you called it a splash page. What does
19 that mean?

20 A It means it's one solid page versus a page with, like, tabs and more robust, if
21 you will.

22 Q And what's the purpose of the splash page, that one in particular?

23 A To collect RSVPs of people that want to attend the rally.

24 Q And with that information, what would be done with the RSVPs?

25 A To remind the people that the rally's here.

1 Q Provide them instructions, too, about where to go?

2 A Arrival instructions, yes.

3 Q And so, if we look at tab 51, it's one page. Does that appear to be the Rally
4 for Trump splash page?

5 A It does.

6 Q All right.

7 Now, you talked earlier, Mr. Budowich, about how your involvement was to
8 celebrate the President's accomplishments on January 6th. Is that right?

9 A Yes.

10 Q And that that was Tea Party Express's goal as well?

11 A Yes.

12 Q Now, if we look at this splash page for RallyforTrump.com, it says at the top,
13 "Stand with the President on January 6th." Do you see that?

14 A Yes.

15 Q And then just below that is a tweet from the President that he sent on
16 January 1st of 2021 at 2:53 p.m. Do you see that?

17 A I do.

18 Q I'm going to read the text of that tweet. "The BIG" -- and "BIG" is in all
19 caps -- "Protest Rally in Washington, D.C., will take place at 11:00 A.M. on January 6th.
20 Locational details to follow. StopTheSteal!"

21 Do you see that?

22 A I do.

23 Q Do you see anywhere in that where the President is saying that January 6th
24 is to celebrate his accomplishments?

25 A I do not.

1 Q And if you go down below, there are event details directing people to the
2 Ellipse and the date and time. And then it says, "Join the Fight," above the RSVP
3 information.

4 Do you see that?

5 A I do.

6 Q All right. And when it says "the fight," what does that have to do with
7 celebrating the President's accomplishments?

8 A It's a normal word and phrase to use to promote a rally.

9 Q Fair enough. But in terms of, in context of celebrating accomplishments,
10 what does the term "the fight" have to do with that?

11 A Again, it's a normal -- I have done probably 300 rallies, all peaceful rallies,
12 and used a phrase like that every time.

13 Q Those rallies were in what context, or what timeframe are we talking about?

14 A From starting in 2011.

15 Q For elections?

16 A For elections, but, no, not just for elections.

17 Q When you say "not just for elections," what else?

18 A Just political activity, political advocating on issues.

19 Q Okay. So, with this splash page, what was there to fight about on January
20 6th still?

21 Mr. Bean. Object. Asked and answered.

22 [REDACTED]. No, I meant, particularly, what was there to fight about?

23 Mr. Bean. He's answered it.

24 The Witness. I believe that the President's accomplishments were worth fighting
25 for.

1 BY [REDACTED]:

2 Q So that's how you interpreted the term "to fight"?

3 A As I recall.

4 Q So there's no mention on this splash page that I can see about where people
5 would go, if anywhere, after the Ellipse rally ended. Am I right about that?

6 A Correct.

7 Q At that time, did you understand that people were planning to march to the
8 Capitol after the Ellipse rally ended?

9 A I remember there being discussions about it.

10 Q What was your view on that, and what would happen at the Capitol?

11 A I don't know that I had a particular view on the march one way or the other.

12 Q Were you concerned at all about people going to the Capitol?

13 Mr. Bean. I'm not sure he was finished with his answer.

14 The Witness. Well, I mean -- well, I'll continue on.

15 I think marches happen in D.C. multiple times a month, so it's not something that
16 would normally elicit concern.

17 BY [REDACTED]:

18 Q Normally. But for this particular day, were you --

19 A I --

20 Mr. Bean. Let him finish his question.

21 The Witness. Sorry. Sorry.

22 Mr. Bean. It's fine.

23 BY [REDACTED]:

24 Q I was just going to say, for this particular day and the particular
25 circumstances of January 6th, was there a concern that you had about people going to

1 the Capitol?

2 A I did not, no.

3 Q And if we look at exhibit 46, if you flip back in your binder.

4 Mr. Bean. Is there a -- can you come to a nice stopping point so we --

5 [REDACTED] Absolutely. I think this will do it. I'm right there with you, Dan.

6 So this will be the last exhibit --

7 Mr. Bean. Thank you.

8 BY [REDACTED]:

9 Q So exhibit 46, if you look, it's an email. And if you look at the bottom right
10 corner, it's what you produced as Bates number 86.

11 All right. And it's an email exchange or a series of emails between you and Sal
12 Russo. Do you see that?

13 A I do.

14 Q All right.

15 Now, if we flip to the back page, so we can start the chain, I'll just direct your
16 attention to the first email, and it's from you to Mr. Russo on December 29th of 2020,
17 and the subject is the "Rally landing page draft."

18 Now, is that reference to RallyforTrump.com?

19 A I believe so.

20 Q And Mr. Russo responds to you at 1:45 p.m. on that same page, you can see,
21 and he has three questions. The third of his questions is, quote, "Do we need to explain
22 a little more of the purpose?"

23 Do you see that?

24 A Yes.

25 Q And then if we flip back to the front page, you respond to Mr. Russo at 1:50

1 p.m. And in your second paragraph -- I'm just going to read it -- you say, "I think it could
2 explain a little more about the purpose" -- and when you say "it," you mean the splash
3 page?

4 A Correct.

5 Q Continuing on, "but not sure it needs to go overboard -- mostly because
6 there are plenty of reasons people want to go. Most of which we don't want to get
7 into."

8 So when you say there are "plenty of reasons people want to go," what are those
9 reasons, to your understanding, at that time?

10 A I don't recall what I was referring to.

11 Q And when you said "most of which we don't want to get into," what did you
12 mean by that?

13 A I don't recall.

14 Q Okay.

15 Mr. Russo responds at 1:57 p.m., and in the second paragraph says, "Since people
16 are coming for different reasons, I know it has to be vague. How about something like
17 'Show President Trump That Americans Stand Behind Him'? Consistent with our ad
18 language and will cover people who want the election overturned to those who just want
19 to say you did a helluva good job."

20 Do you see that?

21 A I do.

22 Q Now, the language that Mr. Russo suggests about "Show President Trump
23 That Americans Stand Behind Him," when we looked at the splash page, it did say, "Stand
24 with President Trump." You saw that?

25 A Yes.

1 Q Now, he refers to "people who want the election overturned" and "those
2 who want to say you did a helluva good job."

3 And when you said, "there are plenty of reasons people want to go, most of which
4 we don't want to get into," between the two he says there, Mr. Russo, the one about
5 "helluva good job" is consistent with you talking about celebrating the President's
6 accomplishments, right?

7 A It is.

8 Q Right. But the other part he says, about people who wanted the election
9 overturned, did you understand that there were folks coming to town who also wanted to
10 see that happen?

11 A I knew that was -- yes.

12 Q And were you concerned about the President being affiliated with that -- or,
13 I should say, the event at the Ellipse being affiliated with that, overturning the election?

14 A It's -- can you ask that question again?

15 Q Sure. When Mr. Russo refers to "people who want the election
16 overturned," did you have a concern about the rally at the Ellipse being associated with
17 that effort, to have the election overturned?

18 A No.

19 Q You didn't?

20 A No.

21 Q All right. Now, that didn't have anything to do with celebrating the
22 President's accomplishments, did it?

23 A It -- I don't know that they're mutually exclusive.

24 Q Certainly Mr. Russo talks about them as being different. You acknowledge
25 that?

1 A But somebody that wants the election overturned can also want to celebrate
2 the President's accomplishments.

3 Q To be sure. But you could also have one or the other of the two, right?

4 A Sure.

5 Q And were you concerned about someone who just wanted to see the
6 election overturned and not celebrate the President's accomplishments?

7 A I would be concerned with anyone that is not willing to come and organize
8 peacefully. But there's a difference between somebody that wants the election
9 overturned and someone unwilling to organize peacefully.

10 Q To be sure.

11 And, at that time, in late December, just a few days before January 6th, to your
12 knowledge, could the election have been overturned at that point?

13 A Could it have been? I'm not a constitutional scholar.

14 Q Did you believe the Vice President at that time to have the power to
15 overturn the election?

16 A I don't have an opinion on that.

17 ██████████. I think that's as good a point as any if you want to take a break.

18 Mr. Bean. Okay.

19 ██████████. Just for the record, it's 11:07 a.m. by my watch. So why don't we
20 take until 11:15? Is that enough?

21 Mr. Bean. Yeah. Uh-huh.

22 The Witness. Great.

23 ██████████. Okay. So we'll go off the record.

24 Mr. Bean. Thanks.

25 [Recess.]

1 [REDACTED]: We'll go back on the record. It's 11:18 -- 11:19 in the morning.

2 Thanks, Mr. Budowich, for coming back.

3 The Witness. [REDACTED] can I clarify one thing from earlier?

4 [REDACTED]: Yes.

5 The Witness. I did have one email. Some emails were sent to
6 taylor@conservativestrat.com, which is a part of my [REDACTED] account, so if I log into
7 [REDACTED], all the emails are there. So that file was all --

8 [REDACTED]: Thank you. That makes sense.

9 The Witness. -- but I said one.

10 [REDACTED]: Yeah. In other words, it -- I'm not good at technology, but it
11 forwards to your [REDACTED]?

12 The Witness. Correct. So all responsive documents include
13 taylor@conservativestrat, but it's one account.

14 [REDACTED]: Yes. Thanks.

15 Okay. In the time that you all were out, Mrs. Murphy left, so we
16 have Mr. Aguilar still on --

17 The Witness. Okay.

18 Mr. Tonolli. -- but, otherwise, it's the staff that are on with us on the Webex,
19 okay?

20 The Witness. Okay.

21 BY [REDACTED]

22 Q So, when we left, Mr. Budowich, we were talking about, you know, your
23 view at that time, in late December of 2020, about what, if anything, the Vice President
24 could do, and you said you didn't have an opinion. Do you remember saying that?

25 A I do.

1 Q Okay. So, if we look at that email in exhibit 4- -- it's exhibit 46. It's still
2 open in front of you. That was on December 29th to Mr. Russo. You see that?

3 A Forty-six? Yes.

4 Q Okay. So, if we flip back to exhibit 8 in your binder, No. 8, we looked at
5 this -- tell me when you get there. Are you there?

6 A Yes, sir.

7 Q Okay. So, again, this is with the Bates number 1584, and this is a text
8 message exchange with Ms. Pierson that we looked at earlier. It had the comment
9 about the "have big money for the rally."

10 So, if you could turn to the last page in this, if you flip over, you'll see on that last
11 page it's a series of messages from Ms. Pierson -- it's in gray --

12 A Yep.

13 Q -- to you. Okay.

14 And focusing on the third one down, on December 26th of 2020, at 7:51 p.m., Ms.
15 Pierson sends you a link to a Constitution Center blog explaining how Congress settles
16 electoral college disputes.

17 Do you see that?

18 A Yes.

19 Q All right.

20 Now, if you flip to tab 9, you're going to see the article.

21 A Okay.

22 Q Again, at the top, it says, "Explaining how Congress settles electoral college
23 disputes."

24 Do you remember reviewing this?

25 A I do not, no.

1 Q Fair to say, at the start of this article, it says, "The next public step in the
2 2020 presidential election will happen on January 6, 2021, when Congress meets to
3 validate the election."

4 Do you see that?

5 A I do.

6 Q And if you turn the page -- and this just to set timing.

7 A Yep.

8 Q At the top of the second page, the last sentence of that paragraph that
9 carries over says, you know, "Then a joint meeting of Congress is required by the 12th
10 Amendment to count the electoral votes and declare the winners of the presidential
11 election. The session on January 6, 2021, starts at 1 p.m."

12 Do you see that?

13 A I do.

14 Q And did you come to understand in your work on the rally that that would be
15 happening at 1:00 p.m. on that day?

16 A I don't know that I knew the timing of it, but --

17 Q That at least President Donald Trump would be speaking before that vote
18 took place up on Capitol Hill?

19 A I don't know that I put those two points together.

20 Q Okay.

21 If you go back to tab 8 with Ms. Pierson, the next message she sends you in that
22 text chain I see you're looking at now is December 28th of 2020 at 7:59 p.m., and she
23 sends you an article from the publication The Hill. That's -- you can see in the
24 title -- let's see here -- "GOP lawmaker sues Pence in bid to overturn Biden win."

25 And then she sends a text message right after that that says, "Add more confusion

1 to the chaos." And then there are no more messages in what you produced.

2 Do you see that?

3 A I do.

4 Q So, if you turn to tab 10, that is the article from The Hill, "GOP lawmaker
5 sues Pence in bid to overturn Biden win." Do you see that article?

6 A I do.

7 Q All right. Do you remember reading this article?

8 A I do not.

9 Q All right.

10 Now, the first paragraph, if you'll see, just so we can make sure we're on the same
11 page, "Vice President Pence was sued Sunday by Rep. Louie Gohmert -- that's
12 G-o-h-m-e-r-t -- a Republican in Texas, "and several other Republicans in a far-fetched bid
13 that appeared aimed at overturning President-elect Joe Biden's election win."

14 I'm just going to continue on, but do you see that?

15 A Yes.

16 Q All right.

17 "The lawsuit focuses on Pence's role in an upcoming Jan. 6 meeting of Congress to
18 count states' electoral votes and finalize Biden's victory over President Trump. Typically,
19 the vice president's role in presiding over the meeting is a largely ceremonial one
20 governed by an 1887 federal law known as the Electoral Count Act.

21 "But the Republican lawsuit, which was filed against Pence in his official capacity
22 as vice president, asks a federal judge in Texas to strike down the law as unconstitutional.
23 The GOP plaintiffs go further: They ask the court to grant Pence the authority on Jan. 6
24 to effectively overturn Trump's defeat in key battleground states. Election law experts
25 were dismissive of the lawsuit's prospects for success."

1 I'm almost done.

2 Quote, "The idea that the vice president has sole authority to determine whether
3 or not to count electoral votes submitted by a state, or which of competing submissions
4 to count, is inconsistent with a proper understanding of the Constitution,' said Edward
5 Foley, a law professor at the Ohio State University."

6 All right. Do you see that's in the article?

7 A I do.

8 Q Okay. And you don't recall having an opinion on this at the time?

9 A I don't.

10 Q All right.

11 If we look at exhibit 11, this is a document you produced with the Bates number
12 1670, or 1-6-7-0. It's a text chain, and if you see at the top, again, it's with Ms. Pierson's
13 number. Do you see that?

14 A I do.

15 Q And it starts -- the first message there is December 31st, 2020, at 9:43 p.m.
16 Do you see that?

17 A Yes.

18 Q All right. It's a message from Ms. Pierson.

19 I can represent that, at least based on my review of the documents, that tab 8 was
20 the first in time text chain that you had with Ms. Pierson that you produced, starting on
21 December 22nd of 2020 --

22 A Okay.

23 Q -- and that this at tab 11 was the next chain in time that you produced with
24 Ms. Pierson, starting on December 31st of 2020 --

25 A Okay.

1 Q -- all right?

2 Now, if we look at exhibit 20, if you can flip the page -- or flip to tab 20. It's a bit
3 hard to see, but I'll represent to you and you can see by the Bates number that these are
4 text messages that Ms. Katrina Pierson produced with you.

5 And at the bottom right, you can see that it has a Bates number of PIERSON0597.
6 It's in red text. It's a little bit hard to decipher. Can you see that at the bottom right?

7 A Okay.

8 Q Okay.

9 So, if you -- and you can see on that first page, Mr. Budowich, for instance, on
10 December 26th, 2020, at 1:09 p.m., there's your text about, "Call me. Have big money
11 for the rally on the 6th." Do you see that?

12 A I do.

13 Q And that matches up with what was at tab 8, the text messages you
14 produced with Ms. Pierson. Do you recognize that?

15 A Yes.

16 Q All right.

17 So, if you go -- looking at exhibit 20, and you flip the page, you're going to see that
18 if you go all the way down the page, it mirrors the text chain that you produced in
19 exhibit 8, except that she has a response on December 28th at 4:54 p.m. to the article
20 that she sent and her comment, "Add more confusion to the chaos."

21 Do you see your response?

22 A I do.

23 Q And it says, "This seems like a stretch. It would mean we can pick the
24 president forever. Pence, if he was the 2024 nominee and stayed on as VP, could pick
25 his own electors. Doesn't make sense. I mean, he could not even run and just pick his

1 own electors after the election."

2 And, Mr. Budowich, that was in response to the article about Rep. Gohmert's
3 lawsuit?

4 A Okay.

5 Q Was it?

6 A I don't recall.

7 Q Well, it's talking about the authority of the Vice President and what to do
8 with the electoral votes, right?

9 A Right. But you're asking if it's in response to the article. I don't
10 remember if it's in response to the article or not.

11 Q Was it in response to the fact of Rep. Gohmert filing that lawsuit against the
12 Vice President?

13 A I don't recall.

14 Q Okay.

15 So does this help refresh your memory about whether you had an opinion at the
16 time about whether Vice President Pence could overturn the election on January 6th?

17 Mr. Bean. Object. Asked and answered.

18 [REDACTED]: I asked if it refreshed his recollection.

19 Mr. Bean. This is the third time you've asked him.

20 [REDACTED]: This is the first time we're seeing this text.

21 Mr. Bean. He answered the question.

22 The Witness. I mean, I'm seeing this. I don't know that that means I have an
23 opinion as far as a definitive opinion.

24 BY [REDACTED]:

25 Q Do you know why this wasn't produced to us --

1 A I do not.

2 Q -- by you?

3 A No.

4 Mr. Bean. What's that? What's not produced?

5 The Witness. This text message.

6 [REDACTED] Was not included in the text messages sent.

7 Mr. Bean. What's the time on -- I have it here. It would be 12/28 --

8 The Witness. 12/28.

9 Mr. Bean. -- at 4:56 p.m.?

10 The Witness. 4:54 p.m. So it was, like, right after that article was sent, it
11 appears.

12 Mr. Bean. Okay. So, I don't mean to interrupt you, but there are texts from her
13 at 3:24, and then 4:01 from him, and then 3:40. I don't --

14 [REDACTED]. What you're seeing there is the difference between -- Mr.
15 Budowich, you're in California, right?

16 The Witness. Correct.

17 [REDACTED]. So you have a 3-hour time difference?

18 The Witness. Correct.

19 [REDACTED] So, when you had your text messages produced, it reflects an earlier
20 time by 3 hours, right?

21 The Witness. Understood.

22 [REDACTED]. Ms. Pierson -- do you understand where she lives or have a sense of
23 where she lives?

24 The Witness. Dallas.

25 [REDACTED]. Right.

1 Mr. Bean. I thought these were all on UTC, though.

2 The Witness. I don't think hers are. Hers are just her local time, because this
3 looks like a screenshot or something to that effect.

4 BY [REDACTED]

5 Q Let me put it this way. It appears from your computer, based on the fact
6 that you produced portions of your texts with Ms. Pierson, that you have the full text
7 chain with her, to your knowledge?

8 A Say that again.

9 Q You've produced portions of your text messages with Ms. Pierson. Do you
10 understand that? I've shown you a few examples, right?

11 A Correct. Yes.

12 Q So it looks as if some decisions were made about what portions of those text
13 messages to produce to the committee. Is that fair?

14 Mr. Bean. No, it's not.

15 The Witness. No.

16 Mr. Bean. No. What we imaged was presented. We screened it with search
17 times, and that's what we presented. I don't always get every single text that somebody
18 sends me. I don't know why that particular text -- I don't know if she added it or --

19 [REDACTED]. No. This is Mr. Budowich sending it. This isn't Ms. Pierson.

20 Mr. Bean. Right. Well, I don't know why it wouldn't have been recorded.

21 [REDACTED]. Are we saying it wasn't recorded, or was it --

22 Mr. Bean. Why it wouldn't have showed up.

23 [REDACTED]. Are you saying it didn't show up?

24 Mr. Bean. I don't see --

25 The Witness. I -- the answer is, I don't know.

1

BY [REDACTED]

2

Q All right. But you could go back and look, right?

3

A Yes.

4

Q All right.

5

So the next topic is the buses and Turning Point, okay?

6

A Okay.

7

Q All right. So are you aware -- I think we talked about it earlier -- that

8

Turning Point did help to organize buses to bring attendees to the January 6th rally?

9

A I'm aware.

10

Q And do you know who from Turning Point took the lead, so to speak, on that

11

effort?

12

A I do not.

13

Q Was Taylor Bowyer involved --

14

A Tyler.

15

Q Tyler.

16

A Sorry for interrupting.

17

Q No, no, no. We'll clear it up. Tyler Bowyer, right?

18

A Yes.

19

Q Okay. And that's B-o-w-e-r.

20

A Y. Y-e-r. B-o-w-y-e-r.

21

Q You're good at --

22

A I'm not trying to correct you.

23

Q No, no, no, no, no. For the record, I'm shaking my head, not at you; it's

24

that I need to be better at spelling.

25

Okay. So you touched on it briefly --

1 A Yes.

2 Q -- but how would you describe your efforts, such as they were, to help
3 coordinate buses for the rally?

4 A Very --

5 [Discussion off the record.]

6 [REDACTED] And just -- if I may, before you answer, just for the record, Mr. Bean
7 and Mr. Dempsey, if you need a break to talk, please do, but it's getting on the record.

8 Mr. Bean. Okay. Can you hang on for a second?

9 [REDACTED] Sure. We'll take a pause.

10 [Discussion off the record.]

11 Mr. Bean. Go ahead and proceed. Thank you.

12 BY [REDACTED]

13 Q I'll ask it again.

14 A Yep.

15 Q Can you just summarize, as best you remember, what your efforts were to
16 help with the buses to bring attendees to the rally on the 6th?

17 A I don't know that I had any official or formal role in that process.

18 Q Well, whether official or not, what do you remember doing?

19 A I do remember connecting Tyler with Megan because I knew both people.

20 Q Megan who?

21 A Powers. Sorry.

22 Q And why connect Tyler Bowyer with Ms. Powers?

23 A Because Megan Powers was organizing the entry instructions for the rally.

24 And so, needed to know that she knew that buses were coming, but didn't know who. I

25 was familiar with Tyler was sending some buses. So I connected the two so Tyler knew

1 where the buses should park, where people should offload, how they should enter into
2 the rally.

3 Q Typical bus/rally logistics to make it work, right?

4 A Always a headache.

5 Q And understood that D.C. was going to have several road closures around
6 the route, as is typical?

7 A As I recall, yes.

8 Q Okay. But, in terms of getting people on the buses, did you understand Ms.
9 Powers had any role in that?

10 A I don't believe she did.

11 Q Okay. Did you have any role in finding people to get on the buses?

12 A I don't recall having any formal role, so -- and I'll qualify that in that I know
13 that there was a lot of people that wanted to come to the rally, and if someone reached
14 out, I would've forwarded them to Tyler and said, he might be able to have a bus in your
15 area.

16 Q Do you remember anyone in particular doing that?

17 A I don't.

18 Q So, if we look at exhibit 43 -- and let me know when you're there.

19 A I'm here.

20 Q All right. So this is again -- this is a text chain that was produced by Katrina
21 Pierson. That's P-i-e-r-s-o-n. You can see at the bottom in black text that this Bates
22 number is KPIERSON0493. Do you see that?

23 A I do.

24 Q Okay. And the text message is between Ms. Pierson; you, Mr. Budowich;
25 and Tyler Bowyer. Do you see that at the top?

1 A Yes.

2 Q And she's redacted phone numbers for personal privacy. Do you see that?

3 A Great.

4 Q Okay. And Caroline Wren is also on this. Do you see her at the top, her
5 name show up as the first text message?

6 A Yes.

7 Q All right.

8 So, starting on December 31st of 2020, Ms. Wren writes, "Hey! Tyler Bowyer is
9 coordinating buses. Katrina -- do you have recommendations of cities/organizers who
10 could fill buses and Tyler will contract the companies?"

11 And Katrina responds at that same day at 12:12 p.m., "Yes. Have 10 people right
12 now. Will connect."

13 Then, here, it shows that you write, "I have Pa" -- for "Pennsylvania" -- "state sen
14 Doug Mastriano" -- that's M-a-s-t-r-i-a-n-o -- "teams working on organizers. They
15 already have 15 buses coming separately. Trying to figure out if they want to add or
16 have other spots that we can hit."

17 Do you see that?

18 A I do.

19 Q Do you know what that was about?

20 A I don't recall.

21 Q Hmm. Do you know State Senator Doug Mastriano from Pennsylvania?

22 A I'm familiar with him.

23 Q How?

24 A I know that he's a State senator in Pennsylvania.

25 Q Have you ever talked to him?

1 A I don't recall. It's possible.

2 BY [REDACTED]

3 Q And when you say it's possible, how would you have come across him?

4 A I mean, we did -- there were rallies in Pennsylvania throughout the election,
5 and he was a supporter of the President.

6 Q Now, you say, "I have Pa state sen Doug Mastriano teams working on
7 organizers." When you say "teams," what did you mean there?

8 A I don't recall.

9 Q And saying "working on organizers," do you know what that means?

10 A I don't.

11 Q When you say, "They already have 15 buses," do you know what that was
12 about?

13 A I don't.

14 Q But consistent with what you said about directing these to Tyler Bowyer,
15 Mr. Bowyer says, "Awesome my team is happy to help contract the buses if you can send
16 me a list of locations you want them from. We can work on logistics for each from
17 there, but we need to get a lot of them done pretty quickly today before the holiday."

18 Do you see that?

19 A I do.

20 Q Does that ring a bell as the type of communications you were having with
21 Mr. Bowyer about the buses?

22 A I think that's consistent.

23 Q All right.

24 Now, again, we didn't receive this text chain from you in your production. Do
25 you know why?

1 A I do not.

2 Q Now, are you aware that State Senator Doug Mastriano was in D.C. on
3 January 6th of 2021?

4 A I do not, no.

5 Q Do you --

6 A Or I don't -- don't remember knowing that he was.

7 Q Do you know that he showed up on the list of speakers that Caroline Wren
8 was proposing for that day?

9 A Not that I recall, but --

10 Q We'll get to that then.

11 So, if we look at exhibit 14 and flip back, this is a text chain that you can see
12 it's -- it's Bates stamped, produced by you, as 1716. Do you see that at the bottom right
13 corner?

14 A Yep.

15 Q And, at the top, you can tell again this is with Ms. Pierson with her [REDACTED]
16 number. Do you see that?

17 A Yes.

18 Q All right. And it starts on January 4th of 2021, with a message from you at
19 2:57 p.m. Do you see that?

20 A Yes.

21 Q And if you go down on that front page -- the first page, excuse me -- at
22 January 4th, 2021, at 5:50 p.m., you write, "lol, my PA guy organized 30 buses."

23 What is that in reference to?

24 A I don't recall.

25 Q "PA" would be "Pennsylvania," though?

1 A I think that's accurate.

2 Q And it seems to match up with the text that you shared with Tyler Bowyer
3 that we just looked at?

4 A I think so.

5 Q You don't know who your PA guy was with 30 buses?

6 A I don't recall.

7 Q Do you have more than one PA guy who would have buses?

8 A I don't know that I have a PA guy.

9 Q How would you have received messages at this time? Either through your
10 phone? On your texts?

11 A Or phone calls.

12 Q Or emails?

13 A Or emails, yes.

14 Q All right. We've not received any emails or communications with anybody
15 about these Pennsylvania buses, so this would be -- so, you know, again, we'll come back
16 to this at the end, but I'm just saying for the record we've not received anything to that
17 effect, okay?

18 A Okay.

19 Q Now, did you ever have any conversations with Charlie Kirk between the
20 time that you started working on the January 6th rally and before the rally occurred that
21 you can recall?

22 A Not that I can recall.

23 Q By that time in your life, had you already met Mr. Kirk and -- yes?

24 A Yes.

25 Q Had you ever spoken to him before?

1 A Yes.

2 Q Like, could you call him?

3 A Yes.

4 Q And he would call you sometimes?

5 A Yes.

6 Q Now, did you ever have a conversation with Mr. Kirk about why -- well, to
7 your knowledge, did Mr. Kirk come to D.C. on January 6th?

8 A Not to my knowledge. I don't know. I don't know one way or the other.

9 Q Did you ever have a conversation with him about why he, Mr. Kirk, would or
10 would not want to be directly involved in the events of January 6th?

11 A Not that I recall.

12 Q Now, Ms. Wren, did you understand whether she had a working relationship
13 with Turning Point at that time as one of her clients?

14 A I don't have any personal knowledge, no.

15 Q Have you come to learn that since, or you don't know at all?

16 A I don't have personal knowledge of her employment with Turning Point.

17 Q When you say "personal knowledge," what does that mean? I'm sorry.

18 A Like, I don't know if she works for them or not.

19 Q Did you know that she did bring Turning Point in to work on this rally,
20 though, as evidenced by the texts with Mr. Bowyer and --

21 A I -- this is the thing. I don't have personal knowledge -- I don't know if she
22 called them or somebody else called them. I don't know how they got involved.

23 Q Do you know who was paying Turning Point for their -- the efforts they
24 undertook for the rally?

25 A No personal knowledge.

1 Q Do you recall that the rally initially was permitted for Freedom Plaza?

2 A Do I know that?

3 Q Do you recall that?

4 A I don't recall that.

5 Q You don't recall having a text exchange with Justin Caporale about that fact
6 and that it was moved?

7 A Not that I recall, no. It's possible.

8 Q Give me one second.

9 We'll just come back to it.

10 So, if we look at exhibit 13 -- if you can let us know when you're there.

11 A I'm good.

12 Q Okay. It's a text chain that you produced with Ms. Pierson, and it's Bates
13 stamped 1640. Do you see that?

14 A I do.

15 Q All right. And if you could turn in that exhibit to the Bates number
16 page 1643, so a few pages in, do you see at January 4th, 2021, at 3:25 a.m., you write to
17 Ms. Pierson, "I'm just realizing... you know whose name is missing in all this?" And then
18 your next message is at 3:25 a.m. just a few seconds later, and you write, "Charlie Kirk."

19 Do you see those messages?

20 A I do.

21 Q And that's Charlie Kirk of Turning Point?

22 A Yes.

23 Q And Ms. Pierson responds at 3:25 a.m. in all caps with the word "GRIFTER."
24 Do you see that?

25 A I do.

1 Q Do you understand that's in relation to Mr. Kirk?

2 A I don't.

3 Q Do you consider Mr. Kirk to be a grifter?

4 A I do not.

5 Q And you write in response at 3:25:37, "Why isn't he a speaker?" And Ms.
6 Pierson writes "lol" after that.

7 And then continuing on to the next page, in a series of text messages, you say,
8 "Like he is everywhere. He actually turned down hosting the site. Didn't want to be
9 responsible -- smart."

10 Do you see those messages?

11 A I do.

12 Q What were you referring to there?

13 A I don't recall.

14 Q It seems to be a reference to a conversation with Mr. Kirk about him hosting
15 the January 6th event?

16 A I don't recall.

17 Q But that would seem to be what it appears to be about, right?

18 A I -- it could be I talked to somebody else about it. So I don't know that I had
19 that conversation with Charlie at all.

20 Q Do you recall talking to someone else about Mr. Kirk's --

21 A I don't. But you asked -- you're suggesting it has to be Charlie Kirk. I'm
22 suggesting that it could've been anyone.

23 Q And Ms. Pierson responds at 3:26 a.m. In a series of three messages that
24 span between 3:26 and 3:27, she says, "Yep. That's what I assumed. That's why it's
25 great that it'll be at the ellipse and NOT" -- in all caps -- freedom plaza."

1 Do you see those messages?

2 A I do.

3 Q And what did you understand, in your -- from your perception, what she was
4 talking about there?

5 A I don't recall.

6 Q Now, I referred to earlier the fact that it appeared from your documents that
7 you helped consult or helped get into shape the trumpmarch.com website for Women for
8 America First. Do you remember that?

9 A I --

10 Q You brought it up. Do you remember whether you did that?

11 A I don't.

12 Q So, if we look at page 57 -- excuse me, tab 57, do you see that screenshot
13 there of the March for Trump --

14 A I do.

15 Q -- website? Okay. Do you see there's a picture there of the Women for
16 America First bus?

17 A Yep.

18 Q Do you recognize this as the website they had up for the January 6th event?

19 A Yes.

20 Q All right. And you can see in the middle of that exhibit that the menu bar at
21 the top, where "Coalition Partners" is listed, there's a list of coalitions underneath that.
22 Do you see that?

23 A I do.

24 Q All right. So I'm just going to read them. It says: Women for America
25 First, My Pillow, Turning Point Action, Phyllis Schlafly Eagles -- "Schlafly" is

1 S-c-h-l-a-f-l-y -- Moms for America, Peaceably Gather, Wild Protest, Tea Party Patriots,
2 and Stop the Steal.

3 Are you familiar with all those organizations?

4 A I know that they exist.

5 Q Okay.

6 If we flip back then to tab 56, you'll see this is an email you produced. And, at
7 the bottom, it's Bates stamped 592. And the email exchange, it's an email that
8 Ms. Wren forwards you on December 31st of 2020 at 1:57 p.m., and the title is
9 "Suggested" -- or subject, rather -- "Suggested list order and groups."

10 Do you see that?

11 A Yes.

12 Q And do you see that the first email in this chain is from someone going by Ali

13 A. with an email handle [REDACTED] Do you know who that was?

14 A I do not.

15 Q Could it be Ali Alexander?

16 A That would make -- that's possible, sure.

17 Q And it's him writing to Ms. Wren. And his email says, "Groups involved in
18 March to Save America." And he lists there at the bottom -- he says, "How I would
19 phrase it on the website: 'Participating coalition partners.'" And he lists 10 groups,
20 including Stop the Steal, WildProtest.com, Women for America First.

21 Do you see all those?

22 A I do.

23 Q And then Ms. Wren forwards it to you. And your response at 1:57 is, "Kk.
24 Website will be ready in 2 hours."

25 Do you understand that to have been you talking about the Women for America

1 First website?

2 A I don't.

3 Q Did you work on any other website where there was a list of coalition
4 partners?

5 A I was working on the splash page for Rally for Trump.

6 Q We can go through all your texts, but the splash page, did that have a list of
7 coalition partners?

8 A No, it didn't.

9 Q Okay. So, when you talk about the "website will be ready" and she's
10 sending you the list of coalition partners --

11 A But, with the timing of all this, I don't know that I was specifically referring to
12 the Women for America First website.

13 Q Okay.

14 A It's possible.

15 Q Was there any other website you worked on that had coalition partners?

16 A No.

17 Q So did you understand at that time -- so this is in late December -- whether
18 there was any, what I'll call "drama," for lack of a better word, between the Kremers and
19 Ali Alexander?

20 A I know the Kremers were involved in a lawsuit. I don't remember who it
21 was with.

22 Q All right. Someone that was at least involved in the 6th events, that it
23 created a bit of, I don't know, tension amongst the groups?

24 A Sure.

25 Q And, on that point, how would you describe the role that Ms. Pierson was

1 playing as a general matter in all of these events around the 6th, you know, given her
2 background with coalitions and the like? From your perspective, what was she doing?

3 A I know that she had a strong relationship with Amy Kremer and that
4 was -- she was, in some capacity, a conduit for Kremer and other organizers involved.

5 Q And, then, how would you describe the level of involvement Ms. Wren had
6 in the particulars of all of the efforts being done to build the crowd for the January 6th
7 rally?

8 A When you say "level of involvement," what does that mean?

9 Q Whatever your perception was of how --

10 A Well, I say that because voicing an opinion versus the decision being made
11 are two different things. So I know that, as I recall, Caroline Wren had a lot of opinions
12 on how things should be done. That doesn't mean her opinions were honored or
13 followed in all cases.

14 Q And it seems that -- the impression one gets from reading some of your
15 documents or conversations with Ms. Wren or about her was that it became frustrating
16 about her level of opinions that she was sharing when it came to the January 6th events?

17 A It wasn't -- I don't know that the frustration was in the frequency or the
18 amount of opinions.

19 Q What would you say it came from?

20 A There was frustration in -- I have gotten frustrated with Caroline for various
21 reasons. I don't know specifically what it was on this.

22 Q If we look at exhibit 5 -- and this is a text chain you produced. It has Bates
23 number 1587 on the first page, and it's with Ms. Wren.

24 And, Mr. Budowich, if you look at -- and it starts on December 31st of 2020. At
25 5:52 p.m., Ms. Wren sends you a link to a site, some internet site. Do you see that?

1 A Yes.

2 Q All right.

3 And your response is, "Is this from the kremer group or did you go ahead and have
4 someone else do it?"

5 And her response is, "it's from Ali it's just an example you need to pull the bottom
6 list of partners though. He also said he's happy to send you the files if you'll want to
7 build off this."

8 Do you see that?

9 A Yes.

10 Q All right.

11 And then your response at 6:04 p.m. is, "You keep like doubling up and
12 reinventing the wheel. Lol I don't want to do shit for nothing. I talked to Katrina and
13 Tyler last night. Working with katrina to find locations and organizers who can fill buses.
14 I told you this. If you wanna do everything, I am good with that, just don't call me
15 bitching that I am not leaning in lol."

16 So was that the type of frustration you were experiencing from her -- from Ms.
17 Wren?

18 A I mean, I think the message speaks for itself.

19 Q Okay. But particularly here, what was it that was -- that prompted that
20 response? She's sending you a website and saying it came from Ali. Did you
21 understand that to be Ali Alexander?

22 A I don't recall, but --

23 Q Was there any other Ali working on this that you're aware of?

24 A Not that I'm aware of.

25 Q So what about this particular thing that she sent prompted your response?

1 A I don't recall.

2 Q Okay.

3 And, again, you refer to here "working with Katrina to find locations and
4 organizers who can fill buses." Do you remember what those efforts included?

5 A I do not.

6 Q Now, do you know how Caroline Wren came to be working with Ali
7 Alexander?

8 A I do not.

9 Q She never told you?

10 A I don't believe so.

11 Q Did anyone else ever tell you?

12 A I don't believe so.

13 Q Had you known them to work together in the past before this January 6th
14 rally?

15 A I was not aware of their --

16 Q Did it strike you as out of the ordinary that she was working with
17 Mr. Alexander?

18 A I don't -- what do you mean, "out of the ordinary"?

19 Q Based on what you knew about Ms. Wren and the circle she moved in, did
20 anything about that strike you as unusual?

21 A I don't know that I have an opinion on the normality of it.

22 Q To your knowledge, during all this time, did Ms. Wren -- was she speaking or
23 communicating with anyone who at the time was a White House official about the
24 January 6th events, to your knowledge?

25 A I don't have any personal knowledge, no.

1 Q Did she ever represent to you that she was?

2 A I don't recall.

3 Q From your knowledge of Ms. Wren, did you know her to have any
4 connections within the White House that she could speak to directly at that time?

5 A Given that we were all on the campaign in a senior capacity, there was
6 plenty of overlap between White House and campaign officials on the campaign trail, so it
7 wouldn't surprise me.

8 Q Okay.

9 So, if we look at exhibit 11 -- well, I should start with this. Did Ms. Wren's work
10 with Ali Alexander cause any sort of tension with Ms. Wren and Ms. Pierson about
11 planning for the January 6th events?

12 A I don't recall.

13 Can I stop real quick, though, and go back to this website situation?

14 In a previous text message that we discussed already, I made the point to Caroline
15 that I'm doing a splash page; if you wanted a full website, that's a completely different
16 undertaking.

17 So there was disagreement, I suppose, of the capacity and to which I was
18 responsible for building a website or a splash page.

19 Q Understood. So there's the splash page, right? Yes?

20 A Correct.

21 Q Right. So --

22 A And so she -- in these conversations, she said, there's not this tab and this
23 tab, or, I'm frustrated. And I said, that's not what this was supposed to be.

24 Q Fair enough.

25 It probably helps to look at the texts that Ms. Wren produced with you, because

1 they display in a format that makes it easier to have this conversation.

2 A Understood.

3 Q So, if you look at tab 7 -- and it's going to be the -- if you look in the bottom
4 middle, you see where the Bates stamp is, but turn to the page 742. And if you can
5 just review the text messages and let me know you're done, all the way through at least
6 Bates number 750. Can you just take the time and look at those?

7 A So 742 through 75- --

8 Q Yeah.

9 A 750?

10 Q That's correct.

11 A Okay.

12 Q Are you done?

13 A Yes.

14 Q So is it fair to say that it shows that you're talking with Ms. Wren in those
15 texts about the trumpmarch.com website?

16 A It does.

17 Q Does that refresh your memory about whether you were working on it?

18 A It does to some extent.

19 Q And who were you working with on that website? Do you remember?

20 A I don't recall the name.

21 Q Does the name Scott Graves --

22 A Yes.

23 Q Had you ever worked with Mr. Graves before?

24 A Not that I recall.

25 Q Do you remember the name of his company, Liberty Lab?

1 A That sounds accurate.

2 Q All right.

3 I don't know that we saw any emails that you produced with Mr. Graves. I could
4 be wrong. But do you recall exchanging emails with Mr. Graves?

5 A I do -- I do recall being on emails with him.

6 Q Oh, that's right. And sending RSVP numbers and updates?

7 A Correct.

8 Q All right. In terms of communicating about the way the website looked, do
9 you think those would've happened over the phone or --

10 A It's possible, yes.

11 Q Or sharing a screen and looking -- I don't know how that works.

12 All right. And through the last two pages you reviewed, 749 and 750, you see
13 the screen captures that you send of the coalition partners on the website. Do you see
14 that?

15 A I do.

16 Mr. Bean. Keep going.

17 He's there now.

18 [REDACTED] Oh. Thanks, Dan. Thank you.

19 BY [REDACTED]:

20 Q So you see now the coalition partners that you sent the pictures of?

21 A I do.

22 Q All right.

23 Now, if you look on 749, before you send that picture, you send a message. This
24 is Saturday, January 2nd, at 10:49 a.m., and there's a long text that you send. And, in
25 the middle, you say, "It's hilarious that you ask me what is worked out on data. You

1 handed hundreds of thousands of dollars to groups -- mostly nutty -- without a single
2 actual agreement to do anything. You have literally zero legal recourse if they just walk
3 with money and data, and then act like I'm the problem. I have zero confidence there's
4 actual money to pay Katrina let alone me, and even if there was, still not worth it."

5 So when you refer to the mostly nutty groups, who are you referring to?

6 A I don't recall who I was referring to. I know that I have strong objections to
7 both Ali Akbar and Alex Jones, which I voice in a separate email to Caroline.

8 Q To be sure. And you call him "Ali Akbar." Is that the same person as Ali
9 Alexander?

10 A That is how I'm familiar with him, is Ali Akbar.

11 Q Is that how you first met him at CPAC, likely?

12 A I didn't meet him.

13 Q Oh, I'm sorry.

14 A I never said I met him.

15 Q But you understand he also goes by "Ali Alexander"?

16 A Yes.

17 Q Did Katrina Pierson express to you that she shared the same view about
18 Mr. Alexander and Mr. Alex Jones?

19 A I don't recall. It wouldn't surprise me.

20 Q Why wouldn't it surprise you?

21 A Katrina and I, I think, share similar views on what their influence is.

22 Q When you say "they," you mean Mr. Alexander --

23 A Correct.

24 Q -- and --

25 A Alexander and Alex Jones.

1 Q And when you say "influence," what do you mean by that?

2 A Their speaking publicly. Their public remarks.

3 Q Right. But when you say "influence," what do you mean? Influencing
4 whom, and in what way?

5 A I don't know who they're influencing, but their public remarks.

6 Q What about their remarks give you concern about their influence?

7 A It's not how I speak and not how I go about political activity.

8 Q And how do they do it in contrast to you that gives you concerns?

9 A They use language that I wouldn't use.

10 Q What type of language?

11 A I couldn't pull it up off the top of my head.

12 Q Not specific, but the general tenor, what is it that gives you concern?

13 A Without being able to say specifically, I don't want to characterize.

14 Q You can't characterize it all? Is it that it could be --

15 A I can characterize it as I know that I don't speak about political activity as
16 they do.

17 Q Uh-huh. And do they speak in a way that it could incite people to violence?

18 A I'm going to leave it with my answer, which -- I don't speak about political
19 activity how they do.

20 Q And I'm asking you: Is it your impression of the way that they speak,
21 Mr. Alexander and Alex Jones, that it could incite people to violence?

22 Mr. Bean. And he answered the question.

23 [REDACTED]. Not that particular one.

24 The Witness. I did. I'm going to stick with my answer that's been twice now, is,
25 that's not how I speak about politics. I mean, if we can go through specific -- I know that

1 there was tweets that have -- that were sent out around this time that I disagreed with.

2

BY [REDACTED]

3

Q Okay.

4

A I don't remember exactly the contents of those tweets.

5

Q All right. So let's look at exhibit 11, go back to exhibit 11. And, again, the

6

first page of that is Bates number 1670.

7

Just give me one second.

8

Yeah. So, if we start at the bottom of the first page, at December 31st at 9:52

9

p.m. -- I should say, at the top, you see the first message from Ms. Pierson is about

10

trumpmarch.com?

11

A Yep.

12

Q Okay. All right.

13

And then your comment at the bottom of page: "Solid though. Some edits.

14

This should be the landing page, but should create three tabs at the top (1) Participating

15

Coalition Partners (2) Media Registration (it should be its own page) (3) TBD, but link for

16

Arrival Instructions."

17

I think that last part is because the details weren't worked out yet. Is that fair?

18

A That's fair.

19

Q All right. So why were you giving these edits about the website? Where

20

were you getting this direction to make these edits to the website?

21

A This is -- this was my personal view of how a website should be formatted.

22

Q And why did there need to be a list of participating coalition partners?

23

A I don't recall why.

24

Q Would that have come from you or someone else?

25

A Somebody else.

1 Q And who would that else --

2 A I don't recall who it would be.

3 Q If you continue on to the next page, you list participating coalition partners.

4 And, remember, this is with Ms. Pierson.

5 A Correct.

6 Q And this seems to be the same list that Caroline had forwarded you from the

7 Ali A. person. Do you recognize that to be the same?

8 A Yes.

9 Q And you follow that up with a text at 9:52 p.m. after sending that list: "I
10 don't give a fuck what order, but... this is one of those bite the bullet things for them."

11 What did you mean by that?

12 A I don't recall.

13 Q Who is "them"?

14 A I don't recall.

15 Q And who is having to bite the bullet?

16 A I don't recall.

17 Q If we continue on to the next page, which is Bates stamped 1672, Ms.

18 Pierson on December 31st, still at 10:51 p.m., says, "Note: lawyers won't sign off on
19 coalition partner listed due to ongoing lawsuits."

20 Your response: "Why do our people always have to sue each other. So
21 annoying."

22 A Sorry -- sorry --

23 Q Next page.

24 Mr. Bean. He's on the next page.

25 BY [REDACTED]:

1 Q I'll read it again, but it's towards the bottom part. It starts with Ms.
2 Pierson's message at 10:51 p.m. --

3 A Got it.

4 Q -- do you see, about the lawyers?

5 A Yeah.

6 Q All right. And when you mentioned earlier about the Kremers suing
7 people, is that what you were talking about?

8 A I think that there was lawsuits going in different directions.

9 Q And when you say "our people," what do you mean by that?

10 A Conservative-aligned groups.

11 Q And then Ms. Pierson responds, "They released the permits so should we
12 have it mentioned Jan 5 and they can be listed there."

13 "Also, Caroline gave them exclusive Jan 6."

14 Do you know what Ms. Pierson is referring to there about Jan. 5 and Jan. 6 and
15 who's listed?

16 A I don't recall. I do know that there was several events happening during
17 that period.

18 Q Do you recall if there was a January 5th event at Freedom Plaza, the evening,
19 where several of these people like Ali Alexander spoke?

20 A With you saying that, I believe that's -- I remember that, but I don't
21 remember the specifics.

22 Q Okay.

23 Well, if we turn to the next page, starting from the top -- again, this is Bates
24 number 1673.

25 And you respond, "Lawyer is saying that the organizations name cant be on the

1 site or cant be labeled as a partner?"

2 And then you see Katrina responds to your message, "They're not partners.
3 Besides we can't have Ali and Alex Jones married to potus day."

4 And then she says, "Best option is to redirect to Jan 5th."

5 So is this along the lines you said of Ms. Pierson sharing your views about Ali
6 Alexander and Alex Jones?

7 A I believe that's accurate.

8 Q And when she says, we can't have them, either of those gentlemen,
9 "married to potus day," what did you understand that to mean?

10 A Associated with the event and rally at the Ellipse.

11 Q That particular -- have Ali Alexander or Alex Jones at the Ellipse with the
12 President, right?

13 A Correct.

14 Q And she says, again, "Best option is to redirect them to Jan 5th."
15 Is that what we were just talking about earlier, the Freedom Plaza event?

16 A I don't recall.

17 Q Do you remember Alex Jones speaking on January 5th, if you know?

18 A I don't recall, no.

19 [REDACTED]. It's 12:00. We've gone roughly an hour, but do you want to take a
20 lunch break? I've got --

21 The Witness. I'm good to keep going.

22 Mr. Bean. Can we go off the record?

23 [REDACTED]. Yeah. Off the record.

24 [Recess.]

25 [REDACTED]. We're back on the record.

1 Mr. Bean. Thank you.

2 ██████████ Yes, Mr. Bean. Did you have a point you wanted to raise?

3 Mr. Bean. No.

4 ██████████ Oh, okay.

5 Mr. Bean. No.

6 ██████████ I think what we discussed is that I think we're all comfortable just

7 not taking --

8 Mr. Bean. Plowing through.

9 ██████████ -- a lunch break and plowing through.

10 Mr. Bean. Thank you.

1

2 [12:07 p.m.]

3

BY [REDACTED]

4

Q And, again, if we flip back -- and it's a lot of back-and-forth, but --

5

A It's all good.

6

Q -- at tab 7 --

7

A Okay.

8

Q -- that's the text exchange with Ms. Wren. If you go to the Bates-stamped

9

page within that exchange that is 751 --

10

A Is that the second-to-last page?

11

Mr. Bean. You've got it.

12

BY [REDACTED]:

13

Q You see in the middle there your message of, "Given the problem we know

14

we will run into with all the people who think they are speaking but aren't, how about

15

doing a broadcast hosted by Katrina."

16

What was the problem, as you understood it, about was going to speak at the

17

Ellipse event on the 6th with who wasn't going to speak?

18

A I mean, as I recall, looking at this, if you could see the list, I mean, you have

19

speakers that are given, like, 2 minutes to speak. To your point about lawyers, I think

20

anyone on a stage is similar; no one speaks for 2 minutes. This was just a reality of, they

21

are not going to be able to have this many speak. The program's going to run into

22

12 hours, not 2 hours.

23

Q And is it fair to say that, over the next couple days, January 2nd through

24

January 5th, there was a back-and-forth between Ms. Wren and Ms. Pierson about what

25

the run of show was going to look like for the 6th event at the Ellipse?

1 A I think that's accurate.

2 Q With Ms. Wren proposing a lot of speakers and Ms. Pierson keeping it to a
3 more -- to a smaller list?

4 A That's accurate.

5 Q Not just the numbers of speakers, but was it also about at least the quality of
6 certain speakers that Ms. Wren was proposing versus what Ms. Pierson was comfortable
7 with?

8 A I don't recall that.

9 Q You don't recall? Okay.

10 If you look in front of you, in that text exchange with Ms. Wren, you can see what
11 appears to be a list of speakers she sent you, right?

12 A Correct.

13 Q And in orange in the middle of that list, do you see that the name Ali
14 Alexander appears?

15 A I do.

16 Q Do you also see, a few names below that, that Alex Jones appears?

17 A Yep.

18 Q All right. And so those are two people, again, who you said that they don't
19 speak the way that you do, right?

20 A They don't --

21 Q Their politics.

22 A They don't engage in political activity in the same way.

23 Q And your response on the next page is, "Oh... definitely going in a much
24 different direction. Okay then."

25 Do you see that?

1 A Yes.

2 Q All right. So what was the direction you thought it was going until the time
3 you got this list?

4 A Katrina's, which was a slimmed-down, very-narrow-scope speakers lineup.

5 Q Okay. Were Ali Alexander and Alex Jones on that list from Ms. Pierson?

6 A Unlikely, but I don't recall.

7 Q Now, if we look at exhibit 22, if you could turn to that, it's a text exchange
8 that you produced. It has the Bates number 1646.

9 And you see at the top, you see Katrina Pierson's number. Do you see that, the
10 [REDACTED] number that's been showing up?

11 A Okay.

12 Q Yeah. And below that, I can represent to you that is Hannah Salem's phone
13 number. I think you said earlier that you know Ms. Salem?

14 A She was a campaign staffer.

15 Q And if you see, the first text message that Ms. Pierson sends in that
16 exchange is at 3:35 p.m. on January 2nd. It's a link to a Daily Beast article that appears
17 to be titled "Trump Plans to Fight the Election Even After 'Stop the Steal' Rally Ends."

18 Do you see that?

19 A I do.

20 Q She then sends a quote at the same time that says, "'May God have his
21 vengeance on the Hotel Harrington,' Ali Alexander, a lead organizer of Wednesday's rally,
22 said in a Twitter video Monday," close quote.

23 And then Katrina says, "Hannah -- do we have anyone tracking these comments to
24 make sure Jan. 6 surrogates aren't blindsided?"

25 The quote attributed to Mr. Alexander, is that of the nature -- when you say that

1 he doesn't speak about politics the way you do, is that an example of Mr. Alexander
2 speaking in that way?

3 A Yes.

4 Q And that Daily Beast article, if you turn to tab 23, do you see that that's the
5 Daily Beast with the same title, "Trump Plans to Fight the Election Even After 'Stop the
6 Steal' Rally Ends"?

7 A I see that.

8 Q And it has the date January 2nd of 2021?

9 A Yes.

10 Mr. Bean. You all right?

11 The Witness. Yeah.

12 BY [REDACTED]:

13 Q Now, did you have any concerns, Mr. Budowich, at this time in the mere
14 days leading up to the event, about reports of potential violence in D.C. at the event or
15 during the day of the 6th?

16 A Say that again.

17 Q Did you become aware of reports of possible violence in D.C. on January 6th
18 and the days leading up to the event?

19 A I don't recall. I mean, sadly, there's been violence in D.C. for the last year
20 and a half.

21 Q To be sure, but I'm asking about January 6th.

22 A I don't recall.

23 Q And do you remember reading this Daily Beast article?

24 A I don't.

25 Q Would it be a practice to read articles if Ms. Pierson would send it to you?

1 A Not always, no.

2 Q It appears you had looked at the Gohmert article she had sent earlier about
3 the lawsuit?

4 A No, I didn't -- I didn't say that.

5 Q Okay.

6 A We had that conversation.

7 Q If you look at the Daily Beast article, though, and you go to page -- if you see
8 at the bottom right-hand corner, there are numbers, page numbers listed. And so 3 of
9 11, do you see that?

10 A At the bottom?

11 Q Yeah, bottom right corner.

12 A Oh, yes, I do. Sorry. Three of 11?

13 Q Yes.

14 A I'm there.

15 Q Okay. And you see there's a picture of a gentleman with a Proud Boy
16 tattoo on his neck in the middle?

17 A I didn't know that that was --

18 Q No, I know.

19 A But yeah, sure. I see the picture.

20 Q Right.

21 And starting in the first full paragraph on the page, so not the carryover but the
22 full, I'll just read it.

23 "The Jan. 6 rally comes after two earlier Washington protests in November and
24 December failed to save the election for Trump or stop his campaign's nearly perfect
25 record of courtroom defeats. But the protesters' mood ahead of the Jan. 6 protest has

1 turned even more desperate.

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

8 Do you remember reading this at the time?

9 A I don't. But I wouldn't rely on the Daily Beast for accurate reporting or
10 honest reporting about Trump people.

11 Q Ms. Pierson sent it to you, though, right?

12 A She did.

13 Q Do you remember being aware of other reporting that you consider accurate
14 about potential for violence --

15 A I don't recall.

16 Q -- on January 6th?

17 A Sorry for over- --

18 Q So, if you carry over to the next page, the first full paragraph is the quote
19 that Ms. Pierson sent you: Quote, "'May God have his vengeance on the Hotel
20 Harrington,' Ali Alexander, a lead organizer of Wednesday's rally, said in a Twitter video
21 Monday."

22 So that's where it came from. Do you see that?

23 A Well, even this characterization that he's a lead organizer. Have you seen
24 examples of that?

25 Q We're about to look at them.

1 A Okay.

2 Q So -- but it's a good point. Was he, to your knowledge, at the Ellipse rally a
3 lead organizer?

4 A Not to my knowledge, no.

5 Q But the list of coalition partners for the website for the rally came from Mr.
6 Alexander's email to Ms. Wren, which went to you, right?

7 A As I've learned from you, yes.

8 Q But you saw it came from an Ali A.?

9 A Correct.

10 Q And did you know any other Ali A. at the time other than Ali Alexander?

11 A I -- I don't recall, no.

12 Q So, on -- and if you look at exhibit 58, it's an email that you produced, Bates
13 number 684. It's an email exchange between you and Ms. Wren still on January 2nd,
14 that Saturday you talked about, the last day you remember working on this.

15 Ms. Wren, you see, writes at 2:05 p.m., "Can we go ahead and publicize the
16 following speakers on the website?"

17 Do you see that?

18 A I do.

19 Q Included on that list, near the bottom, is Ali Alexander. Do you see his
20 name?

21 A I do.

22 Q All right. Also on the list is State Senator Doug Mastriano. Do you see
23 him in the middle?

24 A I do.

25 Q Do you know, again, how he got on that list?

1 A I do not.

2 Q Did you have any conversations with his staff or with him about appearing
3 on the 6th?

4 A Not that I recall, no.

5 Q Roger Stone is also on the list at the end.

6 A Okay.

7 Q Do you see that?

8 A I do.

9 Q Your response at 6:37 p.m., this was you writing back to Ms. Wren when you
10 saw this list?

11 A Yes.

12 Q And does this email response from you accurately capture how you felt
13 when you saw this list?

14 A Yes.

15 Q All right. So I'll read from it.

16 "I thought my text was clear earlier. Gonna that help Kat and Justin if they need
17 it" -- and I'll stop there.

18 Who's Kat?

19 A Katrina.

20 Q And who's Justin?

21 A Caporale.

22 Q C-a-p-o-r-a-l-e.

23 I'll continue on: "But this isn't what I agreed to help on -- a separate event
24 limited to the family, Ken Paxton and Rudy as speakers and organizers as attendees."

25 I'll just stop there before continuing on. Consistent with what you said earlier

1 about what you discussed with Ms. Wren, that your view of the event was -- was what?
2 To celebrate the President's accomplishments?

3 A Correct.

4 Q And to have it be smaller?

5 A The event?

6 Q Yes, itself. Was it to be a smaller event? Or that wasn't something you
7 were focused on?

8 A What do you mean by "small event"? Are you talking about the speakers
9 lineup or how many people attend?

10 Q Speakers lineup.

11 A Okay. Yes.

12 Q You continue on: "Ali Akbar and Alex Jones are destructive to what the
13 President is working toward and terrible for Don and Kim to share a stage with. I don't
14 want to be involved with that."

15 So you see that?

16 A I do.

17 Q Words you wrote?

18 A Yes.

19 Q Now, again, on the list, he's listed as "Ali Alexander." You see that?

20 A I do.

21 Q Why do you call him "Ali Akbar"?

22 A That's -- when I first became aware of him, that's what he went by.

23 Q All right. So how are those two gentlemen, Ali Akbar and Alex Jones,
24 destructive to what the President is working toward?

25 A I -- so, if I may answer this in a little bit more extensive way.

1 You asked originally about my college experience. I have some college. That
2 college is the American University in Cairo, Egypt. I was there from 2009 to 2011. And
3 it informs my entire involvement and reason I got involved in politics.

4 I asked a cab driver at one point, "What needs to happen in Egypt for Egypt to be
5 prosperous again?" And he thought for a second, and then he said, "Egypt needs to
6 burn to the ground and rise like a phoenix from the ashes." I kind of rolled my eyes and
7 said, "Okay, buddy."

8 And there I was, about an hour later -- or a year later, on an evac flight, looking
9 out the window as a city geographically the size of Los Angeles, the density of New York,
10 was literally on fire.

11 America has problems. The solution to the problems isn't that it needs to burn
12 to the ground. We have the ability to effect change.

13 And I came back to the United States, got involved with Tea Party Express. And
14 that's informed my entire political engagement since, is that through peaceful action we
15 can effect tremendous change. And we saw that, in my opinion, through President
16 Trump and what he accomplished during his administration.

17 How Ali Akbar and Alex Jones speak about political engagement run contrary to
18 my belief of how we should act and how we should be involved in political discourse.
19 And it creates -- often creates a distraction that allows opponents to -- that prevents
20 political success.

21 Q And that's a powerful, you know, history and understanding why you got
22 into politics and do what you do. And you started with talking about how the cab driver
23 said that Egypt needed to burn to the ground. And is that, in a sense, what you think Ali
24 Akbar and Alex Jones were promoting?

25 A I -- I can't speak to what they believe.

1 Q But why are they -- you have to explain, why are they different than you?
2 What about their rhetoric is different than you, that makes you think they're destructive
3 to what the President was --

4 A So, what I'm unable to speak to is whether or not they want destruction.
5 What --

6 Q What did they say?

7 Mr. Bean. Let him finish.

8 The Witness. What they say, I think, creates a distraction from the positive
9 solutions that I think the conservative party, the Republican Party, put forth.

10 BY [REDACTED]:

11 Q Okay. So what do they say that is destructive?

12 A Again, I -- I'm happy to come back with a list of tweets that I don't agree
13 with, but I can't -- I don't know specific words that they've said or phrases that they've
14 said. I have admitted the quote that you said is an example of that. If you want to
15 provide more examples, I'll opine on them, I suppose.

16 Q But the point you were making as you describe it and explain to Caroline in
17 private message is that it's destructive to the President's purpose and that it's not about
18 peaceful actions.

19 A Because you have articles like this Daily Beast article that are written.

20 Q What does the Daily Beast article have to do with it?

21 A They portray Trump supporters in a light that I don't agree with and don't
22 believe is accurate because of things that they say, that quote being one of them.

23 Q The quote from Ali Akbar talking about vengeance on Hotel Harrington,
24 right?

25 A And just to be clear -- yes, that's the quote, but I don't know what Hotel

1 Harrington is.

2 Q Fair enough.

3 And you say it's terrible for Don and Kim to share a stage with -- that is, with Ali
4 Akbar and Alex Jones, right?

5 A Correct.

6 Q And, at that time, did you understand Donald Trump, Jr., and Kimberly
7 Guilfoyle to be appearing at the January 6th rally on the Ellipse?

8 A I knew that it was a possibility.

9 Q All right. At this point, had you discussed with either of them the possibility
10 of them appearing on the stage with Ali Akbar and Alex Jones?

11 A I don't recall. I don't remember having the conversation with them
12 directly.

13 Q Do you know of other people who were?

14 A I don't recall.

15 Q Now, if you look at exhibit 34, it's a text message you produced. It's Bates
16 stamped, the first page, 1596.

17 A Let me catch up to you. One second.

18 Q Yeah. No problem.

19 A I'm here.

20 Q Okay. You see the Bates stamp 1596?

21 A I do.

22 Q And, at the top, the phone number is [REDACTED]. And I can represent
23 to you that's Justin Caporale's phone number.

24 A Okay.

25 Q And we're just going to go through this text exchange.

1 A Okay.

2 Q It starts on January 5th at 9:16 p.m., and you ask, "Who is in charge now?
3 You?"

4 And Mr. Caporale's response: "Katrina but also things are starting to get 'better'
5 with CW and everyone else."

6 And do you understand "CW" to be Caroline Wren?

7 A I do.

8 Q And you respond, "Okay. I guess the fear is that there's an attempt to fall
9 back on CW's original lineup that potus nixed and people are allowed on stage prior to
10 the approved program... Is that a concern you have or worried about?"

11 Is that right?

12 A Yes.

13 Q And we'll get to the "potus nixed" part of this, but just for now, did you
14 understand that Ms. Pierson met with President Trump to talk about who would be
15 speaking?

16 A No.

17 Q You didn't?

18 A That -- Katrina or Caroline? Sorry.

19 Q Katrina.

20 A I don't have personal knowledge that she did. I was told that she did.

21 Q By whom?

22 A I don't recall.

23 Q Justin Caporale responds to you, "Nope. No one is allowed on stage other
24 than what potus signed off on."

25 And you continue responding, "I was just on with katrina, just be wise about pins."

1 Just stopping there, is that Secret Service pins?

2 A Correct.

3 Q And is that about access to the backstage area or near the President?

4 A Yes. Any Presidential event's controlled.

5 Q Back to your text: "Only way to really ensure control. We know how
6 DJTFP rallies can get."

7 Just for the record, what's that acronym mean?

8 A Donald J. Trump for President.

9 Q Continuing on, "This is that x10000 cause no one actually works for anyone
10 after tomorrow."

11 What you do mean by that?

12 A You have a bunch of different groups that aren't accountable to any one
13 person, I suppose.

14 Q And you say "after tomorrow," and you're writing this on January 5th. Do
15 you see that?

16 A Correct.

17 Q What did you expect at this point to happen on January 6th?

18 A A rally.

19 Q Right. But after tomorrow, they're no longer working for anyone. Is that
20 a reference to the certification of the election of Joe Biden?

21 A No. It was a reference to the rally being over.

22 Q All right.

23 And then you continue on, "Please" -- or, excuse me. Now, on January 6th, at
24 7:08 p.m. -- do you see that?

25 A Yes.

1 Q All right. Is it fair to say, even with your time change, I guess this is later
2 on, east coast time, probably 10:00 p.m. or so?

3 A Um, no. So this is UTC, so it's 5 hours behind.

4 Q Oh.

5 A So it's 2:00 p.m., I believe.

6 Q All right. So, to your knowledge, is that when the attack on the Capitol was
7 ongoing?

8 A I don't recall when I sent this, other than -- I mean, I -- the time.

9 Q And you say, "Please don't hate me forever for pulling you into that shit
10 show. Thanks for helping save the day and making the most of it."

11 Do you see that?

12 A Yes.

13 Q All right.

14 And then Mr. Caporale responds, it's reported here as January 7th at 1:17 a.m.,
15 you know, "Hahaha. I love shit shows."

16 And if you turn the page, he continues on at 1:18 a.m., "Today was awesome up
17 until it ended. I'm just thanking god we didn't do it near the capitol."

18 And you respond at 1:22 a.m., "Ya... yikes. Glad we got it to a more reasonable
19 place. If Alex Jones and the nuts spoke, the capital would be burning."

20 Those are words you wrote?

21 A Yes.

22 Q Let's start with Mr. Caporale's comment -- and just so we're clear on timing,
23 this is after the attack has happened on the Capitol and is over, right?

24 A Yes.

25 Q And Caporale's comment is, "I'm just thanking god we didn't do it near the

1 capitol." You see that?

2 A I do.

3 Q And was that something you were aware of when you were planning for the
4 January 6th rally, to keep the Ellipse rally unassociated with anything happening at the
5 Capitol?

6 A I don't recall.

7 Q And when you say "if Alex Jones and the nuts spoke," who are the nuts
8 you're referring to?

9 A I don't recall specifically.

10 Q Would one of them include Ali Alexander?

11 A Likely.

12 Q All right. But it's in the plural. Is there anybody else you would've
13 included in there?

14 A I don't recall.

15 Q -- "the capital would be burning."

16 And "burning" circles back to what you described as your personal experience, in a
17 way, with the cab driver in Egypt and Cairo burned?

18 A Hmm.

19 Q Is that right, in a way?

20 A I mean, I wasn't connecting those two, no.

21 Q But that's the version -- that's what you talked about when we were asking
22 about the rhetoric of Ali Alexander and Alex Jones, right?

23 A Fair.

24 Q And so why are you saying here that "if Alex Jones and the nuts spoke the
25 capital would be burning"?

1 A I don't recall what I meant by that.

2 Q And you meant, "if they spoke," spoke at the rally with the President at the
3 Ellipse, right?

4 A I don't recall.

5 Q Is there any other place you would be talking about "if they spoke" in
6 response to Mr. Caporale's comment talking about where the event was held?

7 A I don't recall.

8 Mr. Bean. Is this a good time for a break?

9 [REDACTED]: Yeah, absolutely.

10 Mr. Bean. Okay.

11 [REDACTED]: So let's go off the record, 12:29 p.m.

12 [Recess.]

13 [REDACTED]: All right. We are back on the record, it's 12:49 p.m., after a short
14 break -- excuse me, 12:39 p.m.

15 BY [REDACTED]:

16 Q So, Mr. Budowich, we're still talking about -- we last were talking about Mr.
17 Alexander and Mr. Jones.

18 If we turn to exhibit 27, let me know when you're there.

19 A Bada bing, bada boom. Here.

20 Q Okay. So this is a text message exchange produced by Ms. Pierson. The
21 exhibit label at the top blocks it, but you'll see it's between Ms. Pierson, yourself, and
22 Mr. Surabian, Andy Surabian.

23 A Correct.

24 Q And its Bates number is KPIERSON0483.

25 So, if you turn to the third page of this -- take as much time as you want to review

1 it, but I'll direct you to the third page. And there's a text by Ms. Pierson on January 6th,
2 2021, at 9:12 p.m. -- do you see? -- in the middle of the page, where she says, "Imagine if
3 Ali or Jones was on the stage today?!!"

4 A Yes.

5 Q All right. Do you understand that to be a reference to Ali Alexander and
6 Alex Jones?

7 A Yes.

8 Q And Mr. Surabian responds, "It's hard to imagine yesterday going worse but
9 yes that would have made it 100x worse lol."

10 And Ms. Pierson responds by, like, emphasizing like you can on the iPhone. Do
11 you see that?

12 A Uh-huh, yep.

13 Q And some sort of emoji.

14 And then you respond that same night, January 7th, at 10:19 p.m., "Better than on
15 stage. Good job kat."

16 So what were you responding to there when you were saying --

17 A I don't recall.

18 Q Did you agree with the sentiment that it would have been 100 times worse if
19 Ali Alexander and Alex Jones had been on the Ellipse rally stage?

20 A As I continue to say, they're irresponsible people. And, I mean, that stands
21 for itself. I don't -- there's no point in quantifying it.

22 Q Okay. Thank you.

23 So, about who was speaking on the stage, we've seen Ms. Wren's initial list that
24 you reacted to.

25 A Okay.

1 Q Let's look at Ms. Pierson's list, so starting on -- at exhibit 59. You see it
2 there in front of you. It's an email you produced. It's Bates stamped 714.

3 A Yep.

4 Q And it is an email sent by Ms. Pierson to you, copying Caroline Wren, on
5 January 2nd, 2021, at 10:49 p.m., and it's titled "1/6 Speaker Schedule."

6 Do you see that in front you?

7 A Yes.

8 Q All right.

9 And she starts off her note to you all, "Hey guys, I spent the better part of the day
10 on the phone with these organizers, and was able to get a little guidance from the White
11 House."

12 Do you know who she spoke with at the White House?

13 A I do not.

14 Q Did she ever tell you about speaking with Mark Meadows?

15 A I don't recall.

16 Q How about Dan Scavino?

17 A I don't recall specifically.

18 Q And that's S-c-a-v-i-n-o.

19 If you continue on with her remarks, it's clear that she's attaching a list of people.

20 And if you look at exhibit 60, you'll see the list. If you could just quickly turn over.

21 A Sixty?

22 Q Yes.

23 A Okay. Got it.

24 Q Now, it's produced by -- you see it's 715 at the bottom, your Bates stamp.

25 Do you see that?

1 A Yes.

2 Q And it's an Excel spreadsheet that Ms. Pierson had sent, or a Google
3 spreadsheet. Do you see that?

4 A Got it.

5 Q All right. So what I did to try to be helpful, I think -- no. Did it not show
6 up? Darn it.

7 Oh, yes. On the backside of the page -- flip it over --

8 A Oh.

9 Q -- zoomed in. Do you see that?

10 A Oh, very nice.

11 Q And color coded on the right by the list of names and the schedule. Do you
12 see that? The red, yellow --

13 A I see that.

14 Q -- black, and green? Okay.

15 And if you turn back -- just kind of keep your finger there, and turn back to Ms.
16 Pierson's email in exhibit 59.

17 A Okay.

18 Q To the email, if you flip back. You're still on 60.

19 A Oh. Sorry, sorry. Got it, got it, Got it.

20 Q You see her first three points in the email she explains her color --

21 A I do.

22 Q -- use of color. So the green marks are those who already confirmed
23 speaking on the 5th. So did you understand that to be the event to be held in D.C. on
24 the night of January 5th?

25 A I don't recall.

1 Q You don't recall what about that?

2 A I don't recall what that -- the 5th is confirmed speakers for.

3 Q But at least an event on the 5th?

4 A Sure.

5 Q Yeah.

6 The red marks, by Ms. Pierson's words, "are suggested to move to the 5th and/or
7 SCOTUS." Do you see that?

8 A Yes.

9 Q Did you understand that there was some thought given to whether to have a
10 second stage at the Supreme Court for after the Ellipse rally ended?

11 A I mean, I see that in here. I don't recall any planning of that.

12 Q The third point is, "The yellow marks either don't pass vetting or there may
13 be an issue to explore." Do you see that?

14 A I do.

15 Q Do you know what she's talking about there?

16 A I don't.

17 Q Have you ever been involved in vetting?

18 A Speakers? No.

19 Q Is that a process you're aware of that other people do or at least had done
20 for President Trump events?

21 A I mean, vetting of people that any President is around is a normal process.

22 Q Social -- excuse me. Secret Service you mean?

23 A Correct. Or, I mean, White House political staff. I mean, it's a normal
24 process. So I don't know -- so I don't know if she's referring to that or not, but it
25 wouldn't be surprising that people get vetted.

1 Q Her fourth point: "POTUS expectations are to have something intimate at
2 the ellipse, and call on everyone to march to the capitol. This actually works out,
3 because Ali's group is already setting up at the Capitol, and SCOTUS is on the way."

4 Do you see that?

5 A Yes.

6 Q Was what Ms. Pierson conveyed about the President's expectations, was
7 that consistent with what you had understood to that point to be the expectation for the
8 Ellipse event?

9 A I didn't have any knowledge of the Presidential expectations.

10 Q But in terms of what you were signed on to do, this was consistent with your
11 vision for the event?

12 A No. I don't think that's accurate. I think -- my understanding was, the
13 event was always a rally at the Ellipse. March component was -- was spoke about
14 throughout that time, but ultimately decided against.

15 Q And the march to the Capitol isn't a -- as you had said earlier, that wouldn't
16 have anything to do with celebrating the President's accomplishments.

17 A Well, again, a march is not unusual for D.C. March for Life happens every
18 year, and that is a celebration.

19 Q Sure, in that context. I'm asking about the march to the Capitol. Did that
20 have anything to do with celebrating President Trump's --

21 A There was no march to the Capitol that I was associated with.

22 Q That you personally were associated with?

23 A Correct.

24 Q Who did you understand to be associated with it?

25 A I don't know. I don't recall.

1 Q You didn't have any views on whether the march should happen?

2 A I don't recall having a view. I know that I wasn't involved in any march.

3 Q Let's just briefly look, then, at tab 5. We've looked at this before, but it's a
4 text exchange you produced. It's with Ms. Wren, and it starts at 1587.

5 And if you look at the third page, in the middle, you're going to see a text that you
6 sent Ms. Wren on December 31st, 2020, at 10:48 p.m. Do you see that text?

7 A I do.

8 Q And it says, "POTUS needs to end his speech by saying something like 'Now
9 go march on the capital. march to save America!'"

10 Do you see that?

11 A I do.

12 Q Your words?

13 A Yes.

14 Q Why were you saying that?

15 A Because, as I just said, we were talking about a march through this process
16 that was ultimately decided against.

17 Q Right. But you said you weren't personally involved with the march --

18 A Because there was no march that happened.

19 Q A march did happen.

20 A Not that I was involved in.

21 Q Oh, okay. But here you're saying the President should say for people to go
22 to the Capitol?

23 A Correct. The discussion happened and ultimately was decided against.

24 Q Are you aware that the President actually did on January 6th tell people to
25 march to the Capitol?

1 A I am aware.

2 Q All right. So, consistent with what you said here on December 31st.

3 A I had no personal interaction with the President or White House staff, and,
4 to my knowledge, neither did Caroline.

5 Q When you're saying these words, and it says, "March to save America," what
6 did you mean by that?

7 A That was a theme of the whole rally and, like, the branding of the rally.

8 Q And what was your vision for what people would do when they would go to
9 the Capitol?

10 A I don't know that I had vision --

11 Mr. Bean. Object to form. You're sticking words in his mouth. He didn't say
12 that.

13 [REDACTED]. Well -- so --

14 Mr. Bean. He's testified about it, and now you're twisting what he said and
15 misrepresenting what he said.

16 So go ahead and answer.

17 The Witness. Can you ask the question again?

18 [REDACTED]. Sure.

19 BY [REDACTED]:

20 Q March to the Capitol to do what?

21 A There was no march to the Capitol that I was involved in.

22 Q At the time that you're saying you should tell people to do that, what did you
23 mean?

24 A I don't recall.

25 Q All right.

1 So, going back to exhibit 59, this is Ms. Pierson's email to you and Ms. Wren.
2 Now, sticking with her point four, you know, we just saw -- we saw your comment before
3 the break with Mr. Caporale about, if Alex Jones and the nuts had been speaking, that the
4 Capitol would've burned. Do you remember that?

5 A I remember seeing that, yes.

6 Q Seeing it or saying it?

7 A I remember the text that was just shown.

8 Q Right. Did it give you any concern when you see here that Ms. Pierson is
9 saying the President's expectations are to call on everyone to march to the Capitol and
10 Ali's group would be setting up there at the Capitol?

11 A I mean, I don't recall this.

12 Q So, seeing it now and thinking back on your views on Mr. Alexander, it didn't
13 raise a red flag at the time?

14 A I don't recall.

15 Q Now, how -- when we look, if you flip to tab 60 --

16 A Okay.

17 Q -- and you go to the third page of tab 60. This is Bates stamped -- it came
18 through more clear -- page 721. Do you see that spreadsheet?

19 A I do.

20 Q Do you understand this to be a culled, culled-down speakers list that Ms.
21 Pierson sent, or a shorter speaker list?

22 A I mean, I view this as a shorter speaker list. What is your question?

23 Q Is this one that Ms. Pierson was recommending over the longer one where
24 she had different colors?

25 A I don't recall.

1 Q Okay. Do you see on this list, 721, Ali Alexander or Ali Akbar?

2 A 721?

3 Q Yes.

4 A Oh.

5 Mr. Burns. He's talking about this number.

6 The Witness. This number.

7 And then at what time?

8 BY [REDACTED]:

9 Q Do you see Mr. Ali --

10 A Oh. Oh. No, I do not.

11 The Reporter. One at a time.

12 Mr. Bean. Just make sure you understand the question.

13 The Witness. I do not see his name on the list.

14 BY [REDACTED]:

15 Q Do you see Alex Jones?

16 A I do not.

17 Q Now, do you remember how Ms. Wren reacted to Ms. Pierson circulating
18 this list on January 2nd?

19 A I don't recall.

20 Q Do you recall a Breitbart article on January 3rd that was published about the
21 Ellipse rally?

22 A I don't recall it, no.

23 Q All right. Well, take a look at exhibit 63.

24 A Okay.

25 Q Do you see there's an article from Breitbart by a gentleman named Matthew

1 Boyle, B-o-y-l-e?

2 A I do.

3 Q And you see it's published January 3rd, 2021?

4 A I do.

5 Q And it says at the top, "President Trump to Address 'Stop the Steal'
6 Protestors on White House Lawn."

7 A Okay.

8 Q And if you look at the second page of that exhibit, I'll just read the two first
9 full paragraphs on that page.

10 "The main event will happen on the Ellipsis at the White House" -- there was a
11 typo by Mr. Boyle -- "informally called 'the President's Lawn' -- a source familiar with the
12 organizational efforts said. The President tweeted Sunday morning that he will be there
13 on Wednesday.

14 "The president is expected to deliver remarks beginning at around 11 a.m. He
15 will cap off an event at which several other high-profile names, including" -- and the first
16 name listed is Kimberly Guilfoyle, and it goes through a list of names, and it ends with
17 "and Ali Alexander are all among those expected to speak, per a source involved in the
18 matter."

19 Do you remember seeing this article or at least discussing it with Ms. Pierson and
20 whether Ms. Wren was the source?

21 A I don't recall. I -- I don't recall.

22 Q Do you remember generally a concern that Ms. Wren had leaked to a
23 reporter that Mr. Alexander would be appearing on the stage with the President?

24 A I don't recall this article, no.

25 Q Do you recall what Ms. Wren's reaction was to Ms. Pierson's smaller list of

1 speakers and that certain people were excluded?

2 A I don't.

3 Q Do you remember whether she was happy or satisfied with that?

4 A I don't recall.

5 Q Now, if you look in that and you continue on -- in that article, that is -- it says

6 in the fourth full paragraph, it ends, "Technically, event-goers do not need to register or

7 have tickets, but are being encouraged to RSVP on the website

8 MarchtoSaveAmerica.com."

9 Do you see that?

10 A Sorry. What page is this?

11 Q It's the same page, page 2.

12 A I see it. Yes.

13 Q Yeah. Are you familiar with the website marchtosaveamerica.com?

14 A Yes.

15 Q And did you do any work on that website?

16 A Not that I recall. Is this the website that we talked about earlier in text

17 messages?

18 Q What I'll say is, were you aware that Mr. Alexander's group had a website

19 promoting the event?

20 A I don't recall, no.

21 Q All right.

22 Give me one moment, please.

23 So, if you go back to tab 7 --

24 A Okay.

25 Q -- these are your text messages that Ms. Wren produced. And you go to

1 the Bates number, if you look at the center at the bottom, 742.

2 A It's pretty much all in the back.

3 Mr. Bean. Yep. It's right there.

4 BY [REDACTED]:

5 Q Do you see that picture in the middle that Ms. Wren sent to you labeled
6 "March to Save America" and it's a picture of the President?

7 A I do.

8 Q All right.

9 And you ask, "Is this from the kremer group or did you go ahead and have
10 someone else do it?"

11 And she responds, "It's from Ali it's just an example you need to pull the bottom
12 list of partners though."

13 Do you see that?

14 A I do.

15 Q All right.

16 So, if we look at exhibit 66, it's a one-page sheet, a screen capture of
17 marchtosaveamerica.com. Do you see that?

18 A I do.

19 Q And it seems consistent with what you saw in the text message with Ms.
20 Wren, the "Join President Donald J. Trump outside the White House on January 6th"?

21 A I do.

22 Q All right. Did you ever look at this website, to your knowledge?

23 A I don't recall.

24 Q All right. And you know, if you do look down, though, there's some text to
25 the left --

1 A Where are we now?

2 Q Yeah, I'm going to say. To the left of the RSVP form. Do you see that?

3 A Okay. Yep.

4 Q And it says, "Fight to #StoptheSteal with President Trump on January 6,
5 2021. Millions of Americans will descend upon Washington D.C. to let the
6 establishment know we will fight back against this fraudulent election. Take a stand
7 with President Trump and the #StoptheSteal coalition and be at the Ellipse, President's
8 Park, at 7 a.m. The fate of our nation depends on it. At 1 p.m. we will march to the
9 U.S. Capitol building to protest the certification of the electoral college."

10 Do you see that?

11 A I do.

12 Q And when you talked in the email exchange earlier with Mr. Russo about the
13 different reasons people were coming to D.C., is it fair that one of the reasons could be,
14 as this website was saying, to go to the Capitol to protest the certification of the election?

15 Mr. Bean. I'm going to object to the form. That's not what he testified to.

16 But you can answer.

17 The Witness. That that was a possibility, that people would want to go to the
18 Capitol?

19 BY [REDACTED]

20 Q To protest the certification of the electoral college.

21 A I -- that could be a possibility, yes.

22 Q Okay.

23 But that messaging was not consistent -- this "fight to Stop the Steal" messaging
24 you see on this website was not consistent with what you wanted your involvement to
25 be, which was a celebration of the President's accomplishments, right?

1 A I think that's accurate.

2 Q And the part about marching to the Capitol at 1:00 p.m. was not something
3 that, at least by January 6th, that you wanted to be associated with, right?

4 A Or that was existing in my capacity. Correct.

5 Q All right.

6 In terms of the language used here, "fighting back against the fraudulent
7 election," did you have any sense then of what that, to your knowledge, and thinking
8 about what you understood to be some people coming to town for, what that would take
9 the form of? Fighting against the fraudulent election, what that means?

10 A I can't speak to that.

11 Q All right.

12 So, if we look at exhibit 57 and flip back, this is going to be the website for Women
13 for America First that was shown that you had talked about working on.

14 Do you see that web page?

15 A I do.

16 Q And, again, the coalition partners in the middle that we talked about.

17 But, directing you to the bottom left, underneath the large type that says "March
18 to Save America Rally" -- and the part about "March to Save America" is consistent with
19 that message you sent Ms. Wren on December 31st where you said the President would
20 tell people to march to save America, right?

21 A Correct.

22 Q All right.

23 And, underneath that, the language that appears is, "Democrats are scheming to
24 disenfranchise and nullify Republican votes. It's up to the American people to stop it.
25 Along with President Trump, we will do whatever it takes to ensure the integrity of this

1 election for the good of the nation."

2 Do you see that language?

3 A I do.

4 Q So what was your understanding at that time about what people could do to
5 stop the disenfranchise and nullification of Republican votes?

6 A I wasn't involved in writing this.

7 Q Okay. Did you have an understanding then that anybody could do anything
8 to stop the certification of the election on January 6th?

9 A I know that there was discussions about the possibility.

10 Q And those discussions concerned what?

11 A How the Senate proceeds.

12 Q And the language here, "Along with President Trump, we will do whatever it
13 takes," how do you interpret that language, "whatever it takes"?

14 A I don't know. I didn't write this.

15 Q Okay. Certainly not consistent with celebrating the President's
16 achievements.

17 A Okay.

18 Q Is that -- do you agree?

19 A I agree.

20 Q And yet this was the website promoting the event --

21 A One of the websites.

22 Q Well, the website by the named organizers, Women for America First.

23 A One of the organizations involved. As this shows -- but even this seems to
24 be limited -- there were many organizations involved with promoting it.

25 Q Fair enough. Now, you helped design the website.

1 A Not this page.

2 Q All right. Well, the coalition partners list.

3 A I copy-and-pasted a list, but I was not involved in making decisions over this
4 website.

5 Q And you see on the coalition list "Stop the Steal"?

6 A Yes.

7 Q And did you understand that to be Ali Alexander's group?

8 A I don't know that I knew that at the time.

9 Q Okay.

10 And you see in the bottom right corner of this web page a tweet from the
11 President on January 3rd: "I will be there. Historic day!" Do you see that?

12 A I do.

13 Q And it's retweeting Kylie Kremer saying, "BE A PART OF HISTORY! January
14 6th. White House Ellipse. RSVP @ TrumpMarch.com. #MarchForTrump
15 #StopTheSteal #DoNotCertify."

16 Do you see that?

17 A I do.

18 Q Again, those hashtags all have to do with the election certification, not
19 celebrating the President's accomplishments, right?

20 A Right, but this appears to be a tweet sent after I emailed Caroline saying I
21 don't want to have anything to do with this.

22 Q Okay. And did that have -- that had do with because she was trying to have
23 Ali Alexander and Alex Jones be a part of this.

24 A Correct.

25 Q And rhetoric like, do whatever it takes to fight and Stop the Steal?

1 A That's not what I would've written.

2 Q All right.

3 Do you remember how many people RSVP'ed for the event through these
4 websites?

5 A No. And, to be fair, too, their RSVPs probably happened largely after the
6 President tweeted that he was officially attending, which -- I was at that point out of the
7 mix on RSVPs and monitoring that process.

8 Q Okay.

9 A To my memory.

10 Q So let's look at exhibit 68. And it's a text chain that you produced. It's
11 Bates number, first page, 1703. And if you see at the top on that first page, it's with
12 Justin Caporale's phone number.

13 A Okay.

14 Q And I'd just direct your attention to the third page.

15 A 1705?

16 Q Correct. And do you see that on January 5th at 7:10 p.m. Mr. Caporale
17 writes you, "Hey, can you tell me how many ppl registered?"

18 Is "ppl" people?

19 A I believe so.

20 Q Right.

21 And you responded that same day at 7:25 p.m., "Just under 80k."

22 A Okay.

23 Q Is that 80,000?

24 A I would imagine so, yes.

25 Q Yeah. So, by the eve of, the 5th, you were still aware of how many people

1 had RSVP'ed?

2 A It appears that way.

3 Q Okay. Do you know where you got that information from?

4 A I don't.

5 Q Who would you have gone to? Would it have been Mr. Graves?

6 A It's possible or -- I know that I was still on email chains, so it's possible that I
7 saw it there. I don't recall.

8 Q Now, there at least is a Breitbart story -- I could find it, where you and Ms.
9 Pierson talk about the January 3rd Breitbart story.

10 A There's a story on it?

11 Q No, no. The story from January 3rd --

12 A Ah.

13 Q -- that we looked at about Ali Alexander and other people speaking with the
14 President at the Ellipse. But --

15 A Okay.

16 Q -- I won't go rooting through this.

17 Do you recall that -- you brought it up -- that Ms. Pierson met in person with the
18 President on January 4th to talk about the rally?

19 A I don't recall what you're referring to, but I know that I've read it since in
20 reporting. So I -- if she texted me that, I will -- I'm happy with accepting that.

21 Q Did there come a time in which Ms. Pierson said that she was in control of
22 what was happening on the 6th in terms of speakers because it was coming from the
23 White House?

24 A I don't recall.

1

2

BY [REDACTED]:

3

Q Were you aware of any potential drama leading into the morning of 6th,

4

January 6th, when Caroline Wren was still trying to get people to speak who had been

5

told they weren't going to be allowed to speak?

6

A I don't recall that specifically.

7

Q What do you recall generally?

8

A Nothing. I guess I qualified that because there was plenty of drama around

9

this and infighting the entire time, so I don't recall specifically what it had to do with

10

Caroline.

11

Q We talked about it earlier, but I just want to make sure we capture it.

12

Between the time you started working on the rally and when it happened on January 6th,

13

I think I've heard you say that you didn't have any conversations that you recall with

14

Donald Trump, Jr., or Kimberly Guilfoyle about their participation in it?

15

A That's accurate.

16

Q All right. So possible, but you just don't remember.

17

A Sure. But unlikely.

18

Q And why is it unlikely?

19

A I just don't remember talking to them about this at all. But, again,

20

I -- possible.

21

Q Were you aware of whether Ms. Pierson was trying to speak with either of

22

them, Mr. Trump, Jr., or Ms. Guilfoyle, about their participation in --

23

A I don't recall, no.

24

Q So, if we look at exhibit 14 --

25

A I'm there.

1 Q And we've looked at this one before, but, for the record, it's a text exchange
2 from Ms. Pierson you produced. The first page is Bates number 1716.

3 If we go to the second page --

4 A Okay.

5 Q -- if you look in the middle of the page, there's a text from Katrina on January
6 5th at 6:38 a.m. I'll just read it.

7 She said, "Btw" -- so "by the way" -- "I called Andy to make it clear that they
8 showed up to our event (already only the books) and asked to participate. I bent over
9 backwards to help Caroline. 1. Her crazies didn't even have a stage until I, and ONLY I,
10 had the permits released to them. 2. Caroline changed the plan in the 25th hour and
11 lied about WH being involved. 3. Told him about my discussion with Kim."

12 You respond at 6:42 a.m., "All this is true, and I've kept Andy up on this. He is
13 trying his hardest to stay out of it. Don't worry about Kim. Seriously. She's mad until
14 she finds something new to get mad about."

15 And then Katrina responds, "She was fine at the end because she knows Caroline
16 did this."

17 All right. So, starting with when Katrina refers to "Andy," is that Andy Surabian?

18 A Surabian. It's fine.

19 Q And when Katrina refers in her first point to, quote, "her crazies" do you
20 understand that to be a reference to Caroline Wren, the "her" part of that?

21 A I don't know.

22 Q You don't? When you read it, you can't tell who she's referring to?

23 A I'm unsure. I'm not -- given it says "her," she said it's Caroline in the next
24 line. So I don't know if it's Caroline or her, given -- given after reading it.

25 Q Okay. Who did you understand the "crazies" to refer to?

1 A I don't know.

2 Q "Caroline changed the plan in the 25th hour and lied about WH being
3 involved." What is that about?

4 A I don't recall.

5 Q Because your response is, "All this is true."

6 A Okay? This was almost a year ago.

7 Q Is it true that you were keeping Andy Surabian up to date on what was going
8 on with the rally?

9 A I don't recall.

10 Q Is it something -- well, is it possible you would've been discussing it with him,
11 given his role or connections with anyone, like Ms. Guilfoyle or Mr. Trump, Jr.?

12 A I don't recall.

13 Q Do you recall Ms. Guilfoyle getting mad at Katrina Pierson?

14 A I don't.

15 Q You don't, about when Ms. Guilfoyle learned that she had possibly had been
16 cut from the speakers list for the event on the 6th?

17 A I don't recall it.

18 Q Okay.

19 So let's look at exhibit 30. It's a text exchange that you produced. It's Bates
20 number, on the first page, 1655.

21 If you look at the top, do you recognize the phone numbers there as one
22 belonging to Arthur Schwartz and the other one belonging to Andy Surabian?

23 A I don't recognize them.

24 Q Okay. But then it's titled -- like, this comes from you, Andy Surabian et al.
25 Do see that?

1 A I see that, yes.

2 Q All right.

3 And the text starts with you sending on January 7th at 9:52 p.m. a link to an article
4 that the title appears to be "Republican Attorneys General Dark Money Group Organized
5 Protest Preceding Capitol Mob Attack."

6 Do you recall sending that link?

7 A I don't.

8 Q Do you recall generally that the Republican Attorney Generals office -- it
9 became known that they did a robo-call encouraging people to come to the Ellipse?

10 A I remember the reporting on it, yes.

11 Q And do you remember that Caroline had worked with the executive director
12 of that organization?

13 A I don't recall that, no.

14 Q A gentleman by the name of Adam Piper?

15 A I don't know Adam.

16 Q You then follow up with that right afterwards to say, "I dunno if the don
17 getting paid was real, but someone better tell him he should take anything."

18 What is that about?

19 A I don't recall.

20 Q Who is "the don"?

21 A I don't -- I don't recall. Likely it's Donald Trump, Jr.

22 Q Because, at the time, President Trump was still the President and couldn't be
23 paid for speaking, right?

24 A Correct.

25 Q All right. But Donald Trump, Jr., is a private citizen and could be paid to --

1 A I think there's typos in this too. I wouldn't have referred to him as "the
2 don."

3 Q You think this is mistranscribed or you just --

4 A No, I -- no, my typo. Yeah, yeah.

5 Q Okay.

6 Do you know that Ms. Guilfoyle and Donald Trump, Jr., had arranged to be paid by
7 Turning Point for speaking at the January 6th event?

8 A I do not.

9 Q That's news to you?

10 A I don't know about that, no.

11 Q So what is prompting you to ask whether Donald Trump, Jr., would be paid?

12 A I don't recall.

13 Q Andy says -- Andy Surabian responds to you, "Just told him."

14 Would Andy Surabian be in a position, given your knowledge of him, to be able to
15 speak with Donald Trump, Jr., about anything?

16 A Yes.

17 Q And he asked, "Does it say he was getting paid in there?" Like, they
18 reference to the article, right?

19 A That appears to be accurate.

20 Q Right.

21 And you respond, "No just a hit on the AGs but people have been digging I'm sure.
22 I've been contemplating trying to get ahead of it a bit and just bury her."

23 So getting ahead of what? Reporting on whether Donald Trump, Jr., was paid?

24 A I don't recall.

25 Q And who would you be burying?

1 A I don't recall.

2 Q And he responds -- or, rather, Arthur Schwartz responds, "#metoo."

3 Are you aware that Ms. Guilfoyle has a company called Tru, T-r-u, Media?

4 A It sounds familiar.

5 Q And are you familiar that, when she appears at Turning Point events, will
6 invoice Turning Point through TruMedia for her speaker's fees?

7 A I don't think I have any firsthand knowledge of that.

8 Q Has she ever told you about that?

9 A Not that I recall.

10 Q Do you know what her going rate is for speaking at Turning Point events?

11 A I do not.

12 Q So you didn't know that she was arranged to be paid \$60,000 for her and
13 Donald Trump, Jr., to speak on January 6th?

14 A I'm not familiar with that.

15 Q Okay.

16 So we talked about the march to the Capitol. So, focusing on January 6th, the
17 day of, as of that day, did you have any reason to think that Alex Jones or Ali Alexander or
18 Roger Stone, those three gentlemen, had been in touch with the White House about
19 leading the march from the Ellipse to the Capitol?

20 A I am not aware of -- no.

21 Q And did you have any personal expectation, coming into January 6th, that
22 the President himself would be marching to the Capitol?

23 A I didn't have any expectation.

24 Q Anybody told you that he planned to do that?

25 A I believe I knew that there was a possibility. Again, the march was kicked

1 around. But there was no expectation.

2 Q Are you aware that after January 6th and, in fact, as early as January 7th Alex
3 Jones was saying publicly that he was told by the White House to lead a march from the
4 Ellipse to the Capitol?

5 A I've seen that reported.

6 Q So, on that point -- and we're almost done -- exhibit 16, this is a text
7 exchange with Katrina Pierson that you have that you produced. It's Bates stamped on
8 the first page 1590.

9 I'd just direct your attention on the first page to a text you sent on January 10th,
10 2021, at 2:19 a.m. Do you see -- it's a link to a Twitter -- rather, to a tweet -- with the
11 handle of "andrewkimmel." Do you see that in the link?

12 A I do.

13 Q Okay.

14 If you flip to tab 17, that's a screen capture of the tweet from Andrew Kimmel
15 saying, "Here's Alex Jones admitting the orders were coming from Donald Trump."

16 Do you just recognize generally that that's about Alex Jones claiming he was told
17 by the White House to march?

18 A Understood.

19 Q And what you were tweeting to Katrina to show her?

20 A What I texted did Katrina to show --

21 Q Yes.

22 A Yes.

23 Q Okay.

24 And her response: "OMG," oh my God.

25 And you respond, "Sounds like what Caroline would tell him."

1 When you say "him," you mean Alex Jones?

2 A I don't recall, but it would make sense in this.

3 Q Okay. And why would that be -- why would that sound like something
4 Caroline would tell Alex Jones?

5 A I don't know why I would text that.

6 Q Certainly you wouldn't have expected the White House to tell Alex Jones to
7 lead a march from the Ellipse to the Capitol?

8 A That seems farfetched.

9 Q Now, if you continue on, Ms. Pierson writes, "Ugh," u-g-h. And then on the
10 second page it says, "Kim told be" -- maybe that's a typo, me, but it says "be," b-e -- "Don
11 approved. Dude she's got to go."

12 What did you understand that to be about?

13 A I don't recall.

14 Q All right.

15 Did Ms. Pierson ever talk to you about Kimberly Guilfoyle claiming to her, Ms.
16 Pierson, that Donald Trump, Jr., had looked at a list of speakers for the 6th and had
17 approved it?

18 A I don't recall, no.

1

2 [1:15 p.m.]

3 BY [REDACTED]:

4 Q All right. So if we can look at Tab 36. Are you there?

5 A Sorry. Say that again.

6 Q Tab 36.

7 A Okay.

8 Q So this is a text chain -- exchange that you -- yeah -- that you had with Justin
9 Caporale, and you produced it Bates stamped 1688.

10 A Okay.

11 Q And if we can just look -- make sure I've got it -- give me one second. I
12 might have picked -- ah, I was reading the wrong one. I was on 35. So on 36 is Bates
13 stamp 1602. And you see at the top, it's the same [REDACTED] number for Justin Caporale, and
14 then there's an [REDACTED] number that's part of the chain, and the chain is titled James Blaire,
15 et al. Who is James Blaire?

16 A A friend.

17 Q Who lives in Florida?

18 A Correct.

19 Q And his occupation at this time?

20 A Political consultant.

21 Q And if you look at the text exchanges, he sends you -- the group, you and
22 Mr. Caporale, on January 10, 2021, at 2:14 a.m., that same tweet from Andrew Kimmel
23 about Alex Jones and Justin Caporale responds, "Lying maniac." So consistent with what
24 I think you said about that, it seems farfetched that the White House knew Alex Jones?

25 A Exactly.

1 Q Right. And but you do respond, "I wish that was my initial reaction.
2 Sadly, sounds like what Caroline would tell him since he wasn't speaking." So why does
3 that sound like something Caroline would say?

4 A I don't remember what I was referring to in that instant.

5 Q Well, you know what you're referring to here is about Alex Jones and
6 whether he was marching, right?

7 A Right. But what I'm saying, I don't recall is why Caroline would tell him
8 that.

9 Q Well, I think you said because -- since he wasn't speaking.

10 A Okay. But, okay, then re-ask your question.

11 Q So were you aware that Alex Jones was upset that he wasn't speaking at the
12 January 6th Ellipse event?

13 A In looking back -- well, no, I was not aware that he was upset. I don't recall
14 being -- knowing that he was upset.

15 Q So then what was -- why were you saying this, that Caroline would've told
16 him this since he was not speaking?

17 A I don't recall.

18 Q It looks like Mr. Blaire continues on, "Carole who? Not the White House.
19 Sounds like an agent of Sergio Gor." You see those?

20 A I see those, yes.

21 Q Okay. So it's true that Ms. Wren was not working for the White House at
22 the time, right?

23 A I don't have any personal knowledge of that.

24 Q Right. And who is Sergio Gor? That's G-o-r.

25 A He was a campaign staffer.

1 Q Was he -- did he have any sort of relationship with Ms. Wren at the time that
2 you're aware of?

3 A They were both campaign staff -- staffers in Trump Victory Finance
4 Committee.

5 Q Give me one second. We've reviewed text messages earlier, Mr. Budowich,
6 about your reaction and others after January 6th, the attack, about whether Ali Alexander
7 and Mr. Alex Jones, that it would have been worse if they'd been on the stage at the
8 Ellipse rally. You don't have to agree with me, but just generally those are the
9 character -- those are the text messages I'm referring to.

10 A Okay.

11 Q Did you ever talk to Katrina Pierson after the attack on the Capitol, either
12 while it was going on, or the immediate aftermath, about her being happy that she had
13 made it happen that Ali Alexander and Alex Jones hadn't spoken at the Ellipse?

14 A I don't recall specific conversations.

15 Q Did she ever tell you that she relayed something to that effect to the White
16 House -- people within the White House, that because of her, she'd kept the President
17 from being affiliated with Ali Alexander and Alex Jones?

18 A Not that I recall.

19 Q So if we look at exhibit 67, I will just tell you, these are text messages, a
20 collection of them produced by Ms. Pierson to certain people. And you see at the top
21 on the first page, which has a Bates stamp of Pierson 664 at the bottom right, and it's
22 from January 6th, and the first text message you see is with Max Miller at 2:18 p.m.?

23 A Uh-huh.

24 Q And she's telling Mr. Miller, "And this is why I fought so hard to keep certain
25 people off that damn stage." And notably, this is when the attack on the Capitol is

1 ongoing. And Mr. Miller's response is, "This is looney tunes."

2 And if you flip the page, "Good news is that I was able to keep the crazies off the
3 stage. I stripped all branding of those nuts and removed videos of all of Caroline's
4 psychos so nothing could touch POTUS directly." And Max responds, "Thank God."

5 And then Katrina continues on, "Hence my relentless frustration with Caroline."
6 Mr. Miller responds, "She's awful." Katrina says, "Well, I had officers there to escort her
7 ass off the property because she was going to try and get at least one on the stage.
8 Over my dead body was that happening."

9 Mr. Miller responds, "She always tries to fuck everything up." And Katrina says,
10 "This would've been worse. That's a fuck-up. This would've been Trump planned it. I
11 didn't know what was going to happen at the Capitol. I knew it wouldn't be good, and
12 that's why I could not be flexible at all on this one."

13 Did Ms. Pierson ever share with you those feelings about thinking that something
14 bad was going to happen at the Capitol?

15 A I don't recall.

16 Q Did you share those feelings prior to January 6th?

17 A No.

18 Q Do you understand what the reference is to Katrina having -- trying to have
19 officers escort Ms. Wren off the property the morning of January 6th?

20 A I don't recall.

21 Q All right. So if you continue on to the next page, it's Bates stamped Pierson
22 674. It's a text message between her and Mark Meadows. Do you know who
23 Mr. Meadows is?

24 A I do.

25 Q Right. So on January 6, 2021 at 2:40 p.m., she's texting him to say, "Note, I

1 was able to keep the crazies off the stage. I stripped all branding of those nutty groups
2 and removed videos of all the psychos. Glad it" -- it means I -- fought it." So similar to
3 what she said to Mr. Miller, right?

4 A Yep.

5 Q And so the psychos and nutty groups is a term you had used about -- you
6 had seen a text message where you used --

7 A I don't know that I used psychos, but --

8 Q Nutty groups.

9 A -- nutty.

10 Q Yeah.

11 A Yeah.

12 Q Do you agree with the sentiment Ms. Pierson was saying here about keeping
13 them off the stage and not affiliated with the President?

14 A I do think that there was some people that shouldn't have been on the
15 stage.

16 Q Okay. So just to round it off, I know that you talked earlier about how you
17 were paid by TPX, Tea Party Express --

18 A Uh-huh.

19 Q -- through Conservative Strategies. Did anybody else pay you for your work
20 on the rally?

21 A I received roughly \$3,000 from Go BIG Media in conjunction with that
22 project, same project.

23 Q There's talk in your documents, and I don't know that it happened, that
24 Women for America First or Turning Point might pay you and/or Katrina for your work?

25 A Correct.

1 Q Okay. Did that ever happen?

2 A No.

3 Q And why?

4 A I -- I mean, one, I left and stopped working; but, two, I don't know that that
5 was ever really a thing.

6 Q In other words, whether it was agreed to and they would pay?

7 A Correct. Like I don't know that they would have even known this. This
8 was a -- I think the extent of this conversation is exposed in these text messages.

9 Q Understood. And the same holds true for Ms. Pierson so far as you know
10 about whether she was paid?

11 A Correct.

12 Q All right.

13 A I know that because we just went through a text that said it would run
14 through me. I know for a fact that nothing ran through me to Katrina.

15 Q All right. Can you just give me -- if we can take a 10-minute break, I think
16 we're going to be done. Is that all right?

17 A Okay.

18 Q So if I can just talk to my colleagues --

19 A Yeah.

20 Q -- if you all go to the breakout room. Is that all right?

21 A Yeah.

22 [REDACTED] Okay. We're off the record at 1:25 p.m.

23 [Recess.]

24 BY [REDACTED]:

25 Q So we are back on the record at 1:41 p.m. by my watch.

1 Mr. Budowich, thanks for just giving me the courtesy of just a few minutes. So
2 we'll be done in a few moments.

3 A Okay.

4 Q But moving beyond the events of January 6th within your current role, as I
5 understand it, you are a spokesperson for President Trump?

6 A That's accurate.

7 Q All right. So in that capacity, do you have the opportunity to have
8 conversations with him?

9 A I do.

10 Q Have you had any conversations with him since he's left office and in your
11 current role about the events of January 6th?

12 A In what capacity?

13 Q In whatever capacity -- I don't know what else to ask because I don't know
14 what those conversations have been like. But have you talked to him about January 6th,
15 the events of that day?

16 Mr. Bean. I'm going to object on the grounds of pertinency. I'm not sure how
17 it's relevant to what Mr. Budowich did on January 6th, which is what the legislative
18 committee is supposed to be investigating.

19 BY ██████████:

20 Q To be fair, it's not investigating what Mr. Budowich did on the 6th; it's about
21 the events of January 6th. And President Trump is a person who is -- features
22 prominently in one way or another as a witness and participant in the events that day.
23 So statements that he's made about that day and whether you've heard them --

24 A I -- I -- I don't believe I've ever spoken to him specifically about January 6th,
25 the day.

1 Q The day.

2 A Like, obviously, he puts out comments on this committee frequently, so I -- I
3 can speak to that.

4 Q We're aware of the public comments, so -- but in terms of your
5 conversations with him, so just so I'm clear, you don't recall, or you have not had
6 conversations with him at all about the facts of what he did a that day?

7 A Correct.

8 Q Okay. Have you talked to him about his views on the cause of the violence
9 at the Capitol?

10 A I have not.

11 Q Have you talked to him about his views on whether it was his supporters
12 who were attacking the Capitol?

13 A I have not.

14 Q Have you had any conversations with anyone who was in the White House
15 on January 6th other than the President?

16 A So, I mean, now we're also getting outside the scope of the subpoena,
17 because I didn't start working for the President until late July.

18 Q To be clear, again, the subpoena is to testify about the facts and
19 circumstances of January 6th.

20 A Okay.

21 Q So my question is whether you've talked to anyone who was in the
22 White House on the day of January 6, 2021, about their experiences that day?

23 A I have not --

24 Q Okay.

25 A -- to the best of my knowledge.

1 Q Have you talked about the fact of you being subpoenaed to provide
2 documents and testimony to the select committee with anyone other than your attorneys
3 and family members?

4 A I mean, my face was on CNN, so people know that I've been subpoenaed.

5 Q Fair enough.

6 A It's come up in conversation.

7 Q Have you talked to the -- to President Trump about the fact that you've been
8 subpoenaed?

9 A I have not.

10 Q Have you talked to other people who have been subpoenaed, to your
11 knowledge, to provide documents and testimony?

12 A I still work closely with many people that have been subpoenaed.

13 Q So -- so who, start with the first person you've talked to about that fact.

14 A You've got to give me a list of people that have been subpoenaed. I mean,
15 it's -- I'm going to imagine it's long.

16 Q It is. All right. So have you talked to Justin Caporale about the fact that
17 you've been subpoenaed?

18 A He knows that I've been subpoenaed.

19 Q But have you spoken to him about it?

20 A In what context?

21 Q Talking about expectations or whatever you would do in response to the
22 subpoena in coming here today?

23 A It's possible.

24 Q Possible or you have?

25 A I don't recall specific conversations I've had on this topic.

1 Q How about Katrina Pierson?

2 A I speak to her in a very limited capacity at this point.

3 Q But have you talked to her about the fact of you being subpoenaed to the
4 select committee?

5 A She knows about the fact that I've been subpoenaed.

6 Q I hear you. Have you talked to her about it?

7 A I don't recall specific conversations I've had with her about it.

8 Q Dan Scavino?

9 A I mean, it's going to be the same answer for all these -- I mean, Scavino I
10 work with every day, but we do not talk about the subpoena and the process very
11 frequently, if at all.

12 Q Okay. I mean, the subpoena was issued November 22nd, so just a month
13 ago.

14 A Okay.

15 Q You don't recall whether you've talked to Dan Scavino about --

16 A I don't recall specific conversations I've had with him.

17 Q How about the general thrust of those conversations in the select
18 committee?

19 A I don't.

20 Q How about Mark Meadows, have you spoken to him?

21 A I have not.

22 Q Caroline Wren, have you spoken to her?

23 A I have.

24 Q And have you spoken to her since she -- I think it was reported when she
25 testified to the select committee?

1 A I have.

2 Q Okay. And what did you talk to her about?

3 A She shared with me her general sentiment of it, of her experience.

4 Q Okay. And did she provide any guidance to you on how --

5 A No.

6 Q -- to respond and what topics would be covered?

7 A No.

8 [REDACTED] Okay. I think, at least for me, I'll just check, I have another staff
9 member who is on, who's an investigative counsel, [REDACTED], whose name you see. I
10 don't know if you have any other additional questions or if we're good?

11 [REDACTED] No further questions. You're good, [REDACTED].

12 [REDACTED] Okay. Mr. Budowich, thank you for coming today and for
13 answering the questions. As far as today goes, we're done. I will say though, for the
14 record, we identified several documents today that we had from other people of which
15 you were a participant, text messages and emails, and references to communications
16 possibly with other people like bus organizers.

17 So, you know, at this time, I would hope that, you know, Dan, Chris, that we can
18 work together to complete the production. I understand your objection and we can talk
19 about that if that's the case, but if we can circle back, maybe after the holidays, and you
20 can take a look to see after -- see what's there. Is that fair?

21 Mr. Bean. Yeah. No, we'll go back and take a look. We produced what we
22 have. So Jared can explain again, there wasn't any information on his iPhone. There
23 wasn't any information -- go ahead.

24 Mr. Burns. Yeah. So for the text messages, nothing on the iPhone, nothing in
25 iCloud backup. We were able to locate an archive on his laptop, and we provided the

1 laptop to our IT vendor who imaged it, ran the search terms, and then we reviewed
2 everything and provided what was responsive.

3 So we're happy to go back and look and see if there was some kind of error in
4 there, but they said that not all of the metadata from the text messages was available,
5 and so, it's not a complete copy of everything. We're happy to work with you and go
6 back and look at that, but there's some IT issues that --

7 The Witness. That's the complete.

8 Copy of what is on my laptop?

9 Mr. Burns. Yes, of what we have, correct, yes.

10 Mr. Bean. And as you can see, we didn't redact a thing.

11 [REDACTED]. No, no. I mean, again, it could be, but like you said, I'm not -- let
12 me put it this way, we just put a pin in it just to see where we stand.

13 Mr. Bean. Yeah, 100 percent.

14 [REDACTED]. And what I'll do is I'll reach out after the New Year. But for the
15 record, I'm just going to leave the record open. I don't expect having you to come back
16 and testify. We can sort this out. But just as a matter of formality because work
17 remains to be done, I have to leave that open.

18 The Witness. Understood.

19 [REDACTED]. Okay.

20 The Witness. Thank you.

21 Mr. Bean. We understand.

22 [REDACTED]. Anything else we should talk about before we leave?

23 The Witness. No.

24 [REDACTED]. No, okay. Thank you. The record is -- we're off the record at 1:48
25 p.m.

1 [Whereupon, at 1:48 p.m., the deposition was concluded.]

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Certificate of Deponent/Interviewee

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

Witness Name

Date