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

DEPOSITION OF: RICHARD DOCKERY

Wednesday, February 2, 2022

Washington, D.C.

The deposition in the above matter was held via Webex, commencing at 2:02 p.m.
Present: Representative Schiff.

1

2 Appearances:

3

4

5 For the SELECT COMMITTEE TO INVESTIGATE

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

7

8 [REDACTED] STAFF ASSOCIATE

9 [REDACTED] INVESTIGATIVE COUNSEL

10 [REDACTED] CHIEF CLERK

11 [REDACTED] RESEARCHER

12 [REDACTED] INVESTIGATIVE COUNSEL

13 [REDACTED] INVESTIGATIVE COUNSEL

14 [REDACTED] SENIOR INVESTIGATIVE COUNSEL

15

16

17 For the WITNESS:

18

19 MARK J. O'BRIEN

20 O'BRIEN HATFIELD REESE, PA

21 511 W. Bay St., Suite 330

22 Tampa, FL 33606

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2

██████████ Good afternoon. This is the deposition of Mr. Richard Dockery, conducted by the House Select Committee to Investigate the January 6th Attack on the United States Capitol pursuant to House Resolution 503.

5

6

For the record, I'll ask the witness to please state your full name and then spell your last name.

7

The Witness. Richard Dockery, D-o-c-k-e-r-y.

8

██████████ Thank you.

9

10

11

And this is a staff-led deposition, but members may choose to join and may also ask questions. So I'll make my best effort to announce when a member joins the call and also if any other staff members join the call after now.

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16

I know there are a lot of names on the screen right now, so I'll introduce everybody that we have. My name's ██████████ I'm an investigative counsel with the select committee. We also have ██████████ here. He's to my left; you can't see him right now. But he's a senior investigative counsel with the committee. We have ██████████ ██████████ also investigative counsel. And there are no members on the call right now.

17

18

19

We'll follow the House deposition rules that have been provided to your counsel previously. Under the House deposition rules, counsel for other persons or government agencies may not attend, and you're permitted to have an attorney present.

20

21

I would like to note for the record what has been previously marked as exhibit 1 is the subpoena for Mr. Richard Dockery, which is dated January 10, 2022.

22

23

24

And you are here pursuant to that subpoena for this deposition. I know that you are here with counsel also. So, at this time, if counsel could state their name for the record.

25

Mr. O'Brien. Mark J. O'Brien.

1 [REDACTED] Great. Thanks, Mark.

2 And then before we begin, I just want to cover a couple housekeeping matters.

3 As you might've heard, there's a reporter on the call who will be taking down
4 everything that we say. It's obviously hard to transcribe when two people are talking.
5 So if you can just wait until I finish questions before you start to answer them, and then,
6 also, I'll do my best to wait to ask a new question until you finish. Does that make
7 sense?

8 The Witness. Yes.

9 [REDACTED] Okay. And then, along the same lines, the reporter can't transcribe
10 nonverbal responses like a head shake or a nod, so, if you can, use audible, verbal
11 responses. And that also includes things like "uh-huh"s or "nuh-uh"s. A "yes" or a
12 "no" is much easier to transcribe, so let's be kind to the court reporter and try to stick to
13 that.

14 The Witness. Okay.

15 [REDACTED] Okay. Great.

16 And then, also, I'll just say that, you know, we're here today just to get complete
17 answers from you to the best of your recollection or to the best of your knowledge. So,
18 if I ask a question and you don't know the answer to it, it's absolutely okay to just let me
19 know that you don't know the answer. Does that make sense?

20 The Witness. Yes.

21 [REDACTED] Okay. And then feel free at any point to ask me just to repeat a
22 question or to reword a question if you can't understand it or if it was unclear.

23 The Witness. Okay.

24 [REDACTED] So we are here for a deposition, so you do have to answer all the
25 questions that I ask you unless there's an objection that's based on a privilege that's

1 recognized by the select committee. I'm sure your attorney will help you out here.

2 But if you refuse to answer a question based on a privilege, we might either
3 proceed with the deposition or we may seek a ruling from the chairman on the objection.
4 If the chairman overrules such an objection, you'll be required to answer the question.

5 And then, also, I'd like to remind you, as we remind all witnesses, that it's unlawful
6 to deliberately provide false information to a congressional investigator like myself or the
7 other folks on this call. So, for this interview, providing false information could result in
8 criminal penalties for perjury or false statements. Does that make sense to you?

9 The Witness. Yes.

10 [REDACTED] Okay. Great.

11 And then, also, just kind of a final housekeeping matter. We might be talking for
12 a while, so if at any time point you need a break for the bathroom or water, feel free to
13 let me know. Always happy to take a couple minutes. I will try to take a break every
14 hour, hour and a half, but sometimes I forget, so feel free to stop me and just remind me
15 that you need a break. Does that sound good?

16 The Witness. Yes. Thank you.

17 [REDACTED] Great.

18 And then, also, I'll be asking most of the questions today, but some others might
19 pop in and ask a question, and we'll just give them the opportunity to do that.

20 So, with that, we can have the reporter swear you in. Can you raise your right
21 hand to be sworn?

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

25 The Witness. Yes.

1 [REDACTED] Okay. Great.

2 EXAMINATION

3 BY [REDACTED]

4 Q So, now that we have that out of the way, I just want to start with a few
5 questions about your background. Could you let me know where you currently live?

6 A Yes. Melbourne, Florida.

7 Q Okay. And how long have you been in Florida?

8 A About 13, 14 years.

9 Q Okay. And am I correct that you have a master's in business
10 administration?

11 A Correct.

12 Q Okay. And where is that from?

13 A Bryant College was my undergraduate. New Hampshire College was my
14 master's.

15 Q Okay. Great. And what do you do for a living now?

16 A I am a firearms instructor.

17 Q And am I correct that your wife runs a firearms shop?

18 A Yes. She owns a --

19 Q All right.

20 A -- well, officially [inaudible] gun store.

21 Q Okay. And what's the name of that gun store?

22 A Femme Fatale ARMS.

23 Q Okay. And have you had any sort of prior careers before being a firearms
24 instructor?

25 A Yes. Twenty-eight years I was in IT. Started as a programmer, and my last

1 position being as a senior director of architecture.

2 Q Okay. And then how about before that? Did you have some prior military
3 service?

4 A Yes. I was with the Army and the National Guard, and I was military police.

5 Q Okay. Great. And where were you stationed when you were in the
6 military?

7 A While I was reserve, I got activated for Desert Storm, so Saudi Arabia and
8 southern Iraq.

9 Q Okay. And in the military police, did you have a particular specialty, or
10 what did you do for the military police?

11 A A variety of things. We did long-range reconnaissance. We did
12 transporting prisoners. We did escorting people. We also for a short time did personal
13 security for one of the generals who was over the military police battalion. We also did
14 customs inspections for troops coming home.

15 Q Okay. Understood.

16 You said that you've done some personal -- or that you did some personal security
17 work while you were in the military. Have you ever done that outside of the military, in
18 the private world?

19 A No, just in the military.

20 Q Okay.

21 And then any other sort of law enforcement or military positions that we haven't
22 talked about?

23 A Nope, just while I was in the military. And after that it's been mostly an IT
24 career. I kind of got out and pursued that direction.

25 Q Okay. And then when did you switch over from IT to focusing on the

1 firearms instruction?

2 A The beginning of the pandemic, my entire department was laid off.

3 Q Okay. And, then, so now the gun shop and that instruction is you and your
4 wife's primary source of income?

5 A Yes.

6 Q Okay. Great.

7 I want to transition a little bit to, kind of, your introduction to the Oath Keepers
8 and when you first heard about them. So can you tell me about the first time you
9 learned of the Oath Keepers as an organization?

10 A Yeah. Online, just perusing around, I had read an article on them. They
11 represented themselves as kind of former military, former police,
12 community-service-oriented, partnering with police and communities for overall
13 community safety, things like that. It was an article. So I went to their website, and
14 they had a sign-up thing. So I signed up online at the website.

15 Q Okay. And were you looking specifically for an organization like this when
16 you were browsing, or you just happened to come across this article?

17 A Not really looking, but it was kind of interesting with everything that was
18 going on. This was back in the time when there were a lot of riots all over the place.
19 We had started getting protests in our area. The protests had started growing. Police
20 were retiring, quitting. It was kind of -- seemed like a good idea at the time, just given
21 the environment. But it wasn't something I was particularly looking for.

22 Q Okay. And can you pinpoint that time for us a little bit more? Do you
23 remember a month, a date?

24 A Yeah. It was November 6th.

25 Q Okay. And that's November 6, 2020?

1 A 2020, correct.

2 Q So you found the article about the Oath Keepers that brought you to the
3 website, and did you join immediately? Or tell me how you came to join after that.

4 A I just read a little bit on the website and just signed up just because it
5 seemed pretty consistent and it seemed like a positive organization.

6 Q Okay. Great. And I think you touched on this a little bit, but can you just
7 tell me what were the, kind of, aspects of the Oath Keepers that attracted you to the
8 organization?

9 A The whole community safety and partnering with the police to keep the
10 community safe, working with the communities, keeping the police informed, assisting
11 where necessary for them.

12 It just -- like I said, there was a lot going on at that time, and it was a little
13 nerve-wracking, and it just seemed like a really good organization to support.

14 Q Okay.

15 Had you ever done anything like that before, paired with law enforcement or
16 worked with them in any way?

17 A I wouldn't say worked with them, but paired with them. There are people
18 who work for me who are law enforcement. And, basically, whenever riots,
19 whatever -- well, not riots, but protests were occurring, I would talk to them about it. I
20 would give them any information I saw online about them starting to happen or
21 whatever, who was organizing it. But I wouldn't say working with them. It was more
22 informal. We run into a lot of law enforcement through the shop.

23 Q Right. That makes sense.

24 You mentioned, you know, a couple protests and some incidents around what had
25 happened that summer and leading up. Were there any specific protests or incidents

1 that kind of stood out in your mind as concerning?

2 A On a nationwide basis, some of the bigger ones like you saw up in
3 Washington, like the CHOP zone and that, that was pretty nerve-wracking. And it
4 seemed like every night there was something on the news about one of the cities
5 somewhere where something like that was happening.

6 And then we started to see a bunch of little protests, which really didn't amount
7 to nothing in our area. But then there were a couple of bigger ones starting a little bit
8 north of us and one where -- actually, two where they were actually going out into traffic
9 and stuff. And it kind of made me a little concerned that they were starting to grow in
10 this area too.

11 Q Okay.

12 And can you just -- my Florida geography is not great. Can you locate yourself in
13 Florida for me?

14 A We're in Melbourne, which would be, if you know where Orlando is, in the
15 middle of the State --

16 Q Uh-huh.

17 A -- if you go straight over to the ocean east and then south a little bit.

18 Q Okay. Great. And, then, so where was this particular protest that you
19 said was kind of nearby you but was alarming?

20 A Up in Cocoa, which is just north of us. Probably straight east of Orlando, all
21 the way to the ocean.

22 Q Okay.

23 So all these protests are happening. You find the Oath Keepers online. Did you
24 know anybody else at that time that was a member of the Oath Keepers?

25 A I did not.

1 Q Okay. Did you know anybody that joined with you, or were you just kind of
2 independent in joining them?

3 A I just kind of independent saw it online. It looked like a good idea.

4 Q Great.

5 If we could talk a little bit about, kind of, the logistics of joining and how that
6 process worked for you.

7 A Uh-huh.

8 Q Maybe just start generally, describe for me, how did the either application or
9 admission process work?

10 A You kind of fill out an online form, and then you kind of give your credit card
11 number, like anything I guess. And then they send you a form, and you fill out that form
12 and send that in. And then they do, like, a call, like a Zoom call thing, with one person.
13 And they just go over whatever is on your application, which is your name, address, and
14 all of that. And that's pretty much it.

15 Q Okay. Did the form that you fill out ask for anything other than name and
16 address? Did it have any biographical or professional questions?

17 A Not really professional ones. Ones like what skills do you have or what can
18 you do. And they do ask if you have a concealed carry permit in lieu of a background
19 check.

20 Q Sorry, say that last part again? I didn't catch it.

21 A They ask if you have a concealed carry permit in lieu of a background check.

22 Q Oh, okay.

23 A They do a background check on you if you don't have one.

24 Q Understood. Okay.

25 And then you said that, after you submitted that form, then you had a Zoom call?

1 Is that right?

2 A Yeah. Yeah. A couple weeks later, there was a Zoom call. And it was
3 probably about 5 minutes, just to basically read over the application, confirm it, say okay.

4 Q Okay. And do you know who that Zoom call was with?

5 A It was with the guy that calls himself Gator 1, which would be Kelly Meggs.

6 Q And then did you talk about anything else on that Zoom call, other than just
7 kind of going through each of the questions on your form?

8 A No, not really.

9 Q Okay. What was your impression of what the purpose of that Zoom call
10 was?

11 A Probably just to make sure I'm a real person or something. It didn't seem
12 very, like, in-depth or informative or anything like that.

13 Q Okay. And then, after you had the Zoom call, how did the process proceed
14 after that?

15 A After that, it's just you sit around and there's chat windows that you get
16 invited to. And it's just a bunch of people chatting about things online in -- what is it,
17 the utility there -- Signal.

18 Q Signal. Okay.

19 A Yeah.

20 Q Great. We'll get to that in one second.

21 A Okay.

22 Q When you joined, were you joining the national chapter or was it a State or
23 local chapter?

24 A I guess it's the national chapter, but the person who kind of, like, invites you
25 to things is -- leads the local chapter, because Gator 1 was kind of the Florida lead. But

1 the whole website looks like national chapter stuff.

2 Q Okay. So there was never any formal process of joining some sort of
3 subchapter or State-associated chapter?

4 A No. It's on the application what State you're in, and you just kind of
5 automatically -- that person kind of gives you the invites to the -- whatever chat windows
6 for that State.

7 Q Okay. And did Mr. Meggs describe himself as the leader of the Florida
8 chapter? Or how did you know that he was in a leadership position?

9 A Well, when I first had signed up, it was a guy named Mark Adams who was in
10 the leadership. And I guess there was an announcement that came out that Gator 1 was
11 going to be the new leader and Mark Adams was stepping down.

12 Q I'm sorry. When was that?

13 A Probably a couple weeks into November.

14 Q Okay. Do you know why that leadership change happened?

15 A He gave the reason that he was busy with his work and didn't have time.

16 Q Okay. When you say "he gave the reason," do you have another thought
17 about why he left?

18 A No, not really, because everything was kind of, like, flat, I'd say. There was
19 really nothing happening. It was just some chat windows of guys talking. And I didn't
20 see any reason other than that, and it kind of made sense. I don't know what he did for
21 a living, but whatever it is, I can see highly likely being on your way from extracurricular.

22 Q Okay.

23 And, then, were your interactions in that chat or with other people mostly limited
24 to Florida members, or did you also interact with other chapters or members?

25 A My assumption is it was Florida members, because it was kind of a Florida

1 Oath Keepers chat.

2 Q Okay. Did that chat have a name that you remember?

3 A I don't remember what the name of it was. Because there were a couple
4 along the way; there were a couple of different chat windows. And the Florida one and
5 the names of them I don't remember.

6 Q Okay.

7 Let's look at -- [REDACTED] if you can pull up exhibit 2.

8 So this is, Mr. Dockery, one of the documents that you produced to us.

9 A Okay.

10 Q And it's an email.

11 Can we zoom in a little bit, [REDACTED]

12 Can you see that, Mr. Dockery?

13 A I can. Yep.

14 Q You can see it. Okay. Great. So this is an email, and it looks like an
15 email that is kind of welcoming you to the Oath Keepers. Is that what you understood
16 this to be?

17 A Yes.

18 Q Okay. And I just had a couple questions about this email for you. It looks
19 like it comes from somebody named Edward Durfee.

20 A Right.

21 Q Do you see that?

22 A I do.

23 Q Okay. And do you know who that is?

24 A I just assumed it was a guy who does the admin stuff.

25 Q Okay. Did you ever have any other interactions with him?

1 A I don't think I did.

2 Q And, then, if you can read the text of the email, it mentions -- are you able to
3 read that?

4 A Yep. You want me to read it out loud, or --

5 Q No. That's fine. No, no. I just wanted to make sure you could see it. It
6 mentions an annual member kit --

7 A Yes.

8 Q -- that's going to be sent to you. Can you tell me what that is?

9 A My understanding, it was supposed to be, like, an ID card and a couple
10 patches or something like that, but I never got it.

11 Q Okay. And when you say your understanding, did somebody tell you that
12 you were going to receive that? Or where did that understanding --

13 A Yeah, I think at one person I asked -- at one point I asked what it was, and it
14 was, like, you get, like, a patch and an ID or something.

15 Q Okay. And you asked what it was because this email said you were going to
16 get it and you never saw it?

17 A Right. And, yeah, I didn't know what an annual member kit kit would
18 consist of.

19 Q Right. And then who -- do you recall who told you what the annual
20 member kit was?

21 A I don't.

22 Q Okay.

23 A It would've been probably in one of the chats.

24 Q Okay. So that was the main way you communicated with people, just
25 through these Signal chats?

1 A Uh-huh.

2 Q Okay.

3 Yeah, just a reminder, if we can just get a "yes" for the record.

4 A Yes. I'm sorry.

5 Q Okay, yep.

6 And then the email also mentions a secure chat. Is that referencing Signal? Is
7 that what they told you to join?

8 A Yes.

9 Q Okay. Do you know why the chat was secure or the chat needed to be
10 secure? Did you ever have a conversation with anybody about that?

11 A No. And to be honest with you, I don't put much stock in secure chats.
12 Coming from an IT field, I know that secure chats don't really mean anything. If it's
13 electronic, it's pretty much open to the world and the right people.

14 Q That makes sense, yeah. I could see that.

15 And so you said you joined a chat that was Florida-focused. Were there any
16 other chats that you recall that you were part of?

17 A There was a Southeast one that I remember being in. And then later on
18 there was a Washington one.

19 Q Is that Washington State?

20 A No, no. It was, I guess, anybody going to Washington.

21 Q Okay.

22 And, then, could you just kind of briefly describe to me the Southeast chat? Do
23 you recall anything about it? What were, kind of, the topics of discussion or --

24 A It was relatively dead. Most of the conversation was back and forth on the
25 Florida one or later on in the D.C. one. But the Southeast regional one, I think

1 somebody just put that up and nobody really used it.

2 Q Okay. And then we can talk about the D.C. chat a little bit later.

3 But just looking at this email again, a couple other questions. It looks like Mr.
4 Durfee signed his email and he's got, it says, a life number. Do you know what that is?

5 A I don't know what that is.

6 Q Okay.

7 A I imagine it's like other organizations where you pay a lot of money and they
8 tell you you don't have to pay every year.

9 Q Gotcha.

10 And that actually brings me to my next question.

11 [REDACTED], if you can scroll down a little bit to the next page.

12 I think the text of that email mentions it and then this welcome here also. It says
13 your subscription level was an annual membership.

14 A Right.

15 Q Were there other subscription levels that were available?

16 A There probably were, but I was just kind of exploring to see what it was
17 about, so I just did an annual. I don't recall what the other levels would have been.

18 Q Okay. So was there a fee associated with your annual membership?

19 A It was, like, 50 or 52 or 56 dollars. I think I have the receipt of it that I gave
20 to my lawyer, but it was somewhere around 50 bucks.

21 Q Okay. Great. I think we actually have that.

22 So, [REDACTED], if you could pull up exhibit 3.

23 And so this looks like a bank statement of yours, and it looks like your memory is
24 pretty good. It says it's for 50 dollars.

25 A Uh-huh.

1 Q So that was your -- that was the fee that you paid upfront when you joined
2 the Oath Keepers?

3 A Yep.

4 Q Okay. Were there ever any other fees or dues that you paid to the
5 organization?

6 A No, nothing.

7 Q Okay.

8 And then we talked about the annual member kit that you were supposed to
9 receive. Was there anything else that you were told you'd get for your membership
10 fee?

11 A No.

12 Q Okay.

13 And I think you mentioned this earlier, but the -- you said that you paid this
14 through just a credit card? You entered your credit card information?

15 A Yep. It was kind of an online payment thing.

16 Q Okay. Do you remember anything else about that online payment? Like,
17 was it through a particular platform like Paypal or something like that? Or anything you
18 remember?

19 A I'd be guessing.

20 Q Okay.

21 A I don't remember. I'd be guessing.

22 Q Were there any dues associated with the Florida group as opposed to the
23 national group or just this one-time \$50 fee?

24 A Just the one-time \$50 fee is all I know about or heard about.

25 Q And, then, it sounds like you don't know too much about the inside workings

1 of the dues, so not to belabor the point, but did you ever hear anybody talking about
2 maybe sharing that due amount between national or State organizations?

3 A Not at all. And the whole due thing was, like, a hands-off,
4 just-do-it-online-type thing. And then I didn't really hear anything after that about it.

5 Q Okay.

6 Do you have any idea how many members of the Oath Keepers there are?

7 A No. And people had asked that in a chat before, and nobody had an
8 answer. So I have no idea.

9 Q In the chats, was there anybody, kind of, with authority or like a monitor or
10 somebody that you could ask those sorts of questions if you wanted that information?

11 A The most common person there would be Gator 1, which was Kelly Meggs.

12 Q Okay. Anybody else in, sort of, leadership positions that you saw in the
13 chat?

14 A No. They were kind of more chaotic than anything.

15 Q Okay. Can you tell me -- the chat was chaotic, or the organization?

16 A It was kind of like if you get a room full of guys together and nobody's in
17 charge and they just talk.

18 Q Okay.

19 So, other than Mr. Meggs, did you ever see Stewart Rhodes in the chats?

20 A He jumped in once in a while, kind of did, like, a cheerleader thing, and then
21 left. And that's about it. And it'd be, like, 2 minutes, 3-minute-type thing. And it
22 probably wasn't very often at all.

23 Q Okay. So, other than Meggs and Mr. Rhodes popping in, there was no
24 discernible leadership structure?

25 A No.

1 Q Okay.

2 Through those chats and when Mr. Rhodes joined, did you get any sense that Mr.
3 Meggs reported to Mr. Rhodes? Or what was their relationship like, to the extent you --

4 A Well, my understanding is Rhodes was the head of the national and Meggs
5 was the head of Florida. So that's the only kind of structural thing I would assume to it.

6 Q Okay. Did you know of any leaders of other State chapters?

7 A No.

8 Q Okay.

9 Let's talk a little about any activities, maybe, or -- that you participated in with the
10 Oath Keepers. Were there any trainings for any of the sorts of goals of the
11 organization? So, for example, like, an emergency preparedness training?

12 A No. They talked about potentially having those, but they never had them.

13 Q Okay.

14 A And if they did, it wasn't anything that I was aware of.

15 Q And, as far as you know, if that sort of thing would've happened, it would've
16 just been announced on a Signal chat?

17 A Either that or it would come in, like, a newsletter, because once in a while
18 we'd get a newsletter that would say upcoming things. And I think I've only seen maybe
19 two.

20 Q Okay. Do you recall any of those events that were announced in those
21 newsletters?

22 A They both had to do with Washington. And one of them was, basically, it
23 was on the 4th of January, and that was the one talking about how they're going to be
24 doing the security role for Roger Stone and helping people back to their hotels and things
25 like that. It was kind of just a big --

1 Q Gotcha.

2 A -- "This is what we're doing."

3 Q Okay. Great. Yeah, we'll get into that a little bit.

4 A Okay.

5 Q Other than -- so you received those newsletters. Were there any other
6 sorts of events? Or did you ever meet any other Oath Keepers in person?

7 A I've never met any of them in person.

8 Q Okay. Were you involved in any discussions through the Signal chats with
9 folks that did physically go to some events?

10 A There were no events going on at the time that I was aware of, so I don't
11 think I would've been involved in any of that. I don't remember any events that they
12 would've been talking about.

13 Q Okay. So, from November 6, 2020, when you joined to up until the
14 beginning of January when you disaffiliated, no events that you heard of?

15 A Just the January 6th thing, the rally that was coming up.

16 Q Right, other than January 6th. Understood.

17 So we've talked about the Oath Keepers a little bit. I'm interested to know if you
18 considered joining any other similar groups or if you did join any other similar groups.

19 A No. After this what I refer to as "mess," I don't think I'd ever consider any
20 of that again, to be honest with you.

21 Q Understood.

22 A It made me question my fly-fishing club membership even. I'm telling you,
23 it's -- it's a mess.

24 Q I understand that.

25 How about before you joined the Oath Keepers or around the time that you joined

1 them, were you thinking of any other groups?

2 A No. I just kind of stumbled on them, and it sounded like a really good thing
3 at the time, but it's not like I was seeking it out.

4 Q Okay.

5 Just kind of staying on the topic of other groups, I have a few that I'm going to run
6 through, and if you can tell me if you ever either heard of them or -- what I'd really be
7 interested in is if you heard them discussed in your Oath Keeper Signal chats.

8 A Okay.

9 Q So are you familiar with the Proud Boys?

10 A I have seen those all over the news.

11 Q Okay. Just from the news? Did anybody ever discuss the Proud Boys?

12 A Not that I recall.

13 Q Okay.

14 And then how about the Three Percenters?

15 A That's kind of another thing you hear all over the news and all over any
16 social media and that. There's always talk about that. So I assume it's kind of a
17 militia-type thing and it's kind of an informal militia-type thing, is my understanding,
18 because they don't seem to be, like, an organized group, unless they are.

19 Q Right. But no mention of Three Percenters in any Oath Keeper Signal
20 chats?

21 A No. If they did, it would've just kind of blown over just because it was the
22 January thing.

23 Q Okay.

24 And we can actually just limit this to whether or not you heard them discussed in
25 Signal chats.

1 So how about QAnon?

2 A No, not in a Signal chat. Again, all over the news and social media.

3 Q Okay.

4 And Groypers?

5 A Groypers? No.

6 Q Groypers, no. Okay.

7 How about other militia groups, you know, by any name or any association? Did
8 anybody talk about being members of other militias?

9 A No. I can't recall any names of any militias.

10 Q Okay.

11 Last one I got for you, I promise. First Amendment Praetorians?

12 A Never heard of them.

13 Q Okay.

14 A Not even on social media or anything.

15 Q Okay. Great.

16 [REDACTED] I think [REDACTED] has some questions for you.

17 [REDACTED] are you there?

18 [REDACTED] Yes.

19 Hi, Mr. Dockery.

20 The Witness. How are you doing?

21 [REDACTED] Thank you so much -- I'm all right. Thank you so much for speaking
22 with us today.

23 BY [REDACTED]

24 Q So I know that you were not a part of the Oath Keepers for a very long time,
25 so some of these questions you may not be able to answer fully. But just in our attempt

1 to fully investigate what happened on January 6th, what led up to it, I'd like to ask you
2 some questions more generally about some of what we've learned about the Oath
3 Keepers, see if you can enlighten us any more. And if you can't or you don't think you're
4 qualified to answer the question, please just feel free to say so.

5 A Okay.

6 Q So you talked a bit about your past, your military past, and sort of the
7 intersection between law enforcement and what went on with the Oath Keepers, and so
8 I'd like to ask a little bit more about that in particular right now.

9 A Uh-huh.

10 Q So I think, to the best of your knowledge, what I'd like to know is, who was
11 the Oath Keepers' target audience? What kind of individuals are they trying to recruit?

12 A It sounds like former military and former law enforcement and even current
13 military and current law enforcement. According to any of the literature I read, that's
14 pretty much what they seemed to be targeting.

15 Q That's interesting. Can you elaborate on that "current military and current
16 law enforcement" piece a little bit more? What did you read about that?

17 A It's just, when they talk about their membership, they talk about, we have
18 membership in law enforcement, military, and a lot of veterans and a lot of retired law
19 enforcement. So I assume, in the way it was worded, that it was telling as well.

20 Q Okay.

21 [REDACTED] I just want to state for the record real quick that Mr. Schiff has
22 joined.

23 BY [REDACTED]

24 Q And were there ever any other instances in which you heard other Oath
25 Keepers on these group chats talk about current law enforcement or active

1 servicemembers being part of the organization?

2 A It sounded more like it was a bunch of veterans --

3 Q Okay.

4 A -- where people made reference to past military service, but that's all I
5 heard. And most people didn't even make reference to that, which got me wondering if
6 that was even the case.

7 Q Were you aware of individuals who did not have military or law enforcement
8 background being members of the Oath Keepers?

9 A Not in particular.

10 Q Okay.

11 A Just, a lot of people didn't mention anything.

12 Q And delving into that piece a little bit more, do you know why the Oath
13 Keepers wanted to recruit former law enforcement and military veterans? Were there
14 particular skills that they were hoping to leverage when they joined?

15 A I think it was more kind of, like, a VFW-type thing, I see it as, and it's more of
16 just people that's kind of, like, of a similar background that can relate. And where they
17 were talking about partnering with law enforcement and community, it seemed like that
18 would probably be the personality they would want, rather than just members of the
19 community who are just -- I don't know -- just don't have any kind of background.

20 Q That's really interesting.

21 You mentioned partnering with law enforcement. So can you tell me a little bit
22 more about that? What was your understanding of how the Oath Keepers envisioned
23 themselves working with local law enforcement?

24 A There was talk about keeping track of any activity that was happening as far
25 as riots being organized, protests being organized, and ensuring that that information was

1 funneled to local law enforcement in order to make sure there was an awareness so that
2 any violence could be headed off in the communities.

3 Q And, to the best of your understanding, was there a designated point of
4 contact for Oath Keepers to coordinate with law enforcement, or was it a free-flowing
5 information setup?

6 A That was really unclear. I know any information -- I guess it was kind of,
7 like, up to anybody to try to find any information they could, and we were supposed to
8 funnel it to Gator 1.

9 Q Okay.

10 So we've heard other members talk about a law enforcement liaison position
11 before certain events, such as large protests over the summer of 2020.

12 A Okay.

13 Q Did you ever hear anything about that?

14 A No. No. And I think it's because we didn't have anything really big and
15 dangerous happening in the area.

16 Q Okay.

17 A I know a lot of places, like Washington -- and I heard reference to Louisville
18 and that -- had a lot of big things going on, but I think it was kind of just starting up in
19 Florida, and nothing big or violent had happened yet.

20 Q And --

21 A But --

22 Q Sure. Sorry. I did not mean to cut you off. Did you have more?

23 A No, no.

24 Q And was there ever any indication from national leadership -- I know you
25 mentioned that Stewart Rhodes popped in to the chats a few times. Was there any

1 other material circulated to you about making contact with law enforcement
2 departments?

3 A No. No. And my assumption is that was, like, individuals' roles in
4 leadership-type positions and we were all just the masses, I guess.

5 Q That makes sense.

6 So how else would you say that the law enforcement skills, the military skills of
7 Oath Keeper members were utilized by the organization?

8 A From what I'd seen, not at all. Like I said, all I'd seen was chaotic
9 chatrooms, and so --

10 Q Okay. That's fair. How did you think they were hoping to utilize them?

11 A That I don't know. And I'm not even sure about what skills they were
12 considering to be of value or that, but I had no idea what they'd planned on using them
13 for. I thought it was just more of a personality characteristic.

14 When you think law enforcement and veterans, you think people of decent
15 character, people with decent discipline, kind of, like, more outstanding-citizen-type
16 people. That's just kind of, like, my impression of what -- if you're looking for law
17 enforcement former people and veterans, that's kind of what I would think.

18 Q And you never had any nonpublic or classified law enforcement documents
19 circulated amongst these Oath Keeper chats, right?

20 A Not at all. Not that I saw.

21 Q Are you familiar with Sheriff Richard Mack or the Constitutional Sheriffs and
22 Police Officers Association?

23 A I've heard of the Constitutional Sheriffs, but not the person that you
24 mentioned.

25 Q Okay. He's the leader.

1 A Okay.

2 Q So were there any other conversations you can remember with other Oath
3 Keepers about that organization?

4 A No. And that wasn't even in the chats. I just know about it because it's
5 made the news locally that the Constitutional Sheriffs --

6 Q Okay.

7 A And they've shown them, like, having a big organization meeting. I guess
8 back when Trump was still President, there was a big meeting with him and them.

9 Q Okay.

10 A But that wasn't through the chats. That was just, like, the regular media.

11 Q Just common knowledge. Sure.

12 A Uh-huh.

13 Q So you talked about law enforcement coordination with Oath Keepers -- or,
14 rather, Oath Keeper attempts to coordinate with law enforcement before big events.
15 Did you ever hear specific conversations about those at a national level, or were you not
16 privy to those arrangements?

17 A No. All I heard in the wide-open chats was that they had been at Louisville,
18 and that's all I know.

19 Q Okay.

20 A They had been down -- I don't know what they did there, but they
21 mentioned Louisville.

22 Q Thank you.

23 And then this is skipping ahead a little bit, and we'll work our way back up to this.
24 But did you ever hear any similar conversations about coordination with law enforcement
25 before events in D.C. in December and January?

1 A No, not at all.

2 Q Did that surprise you at the time, given what you --

3 A Prior to going to D.C., for them going to D.C., basically all they were talking
4 about was doing, like, personal security for Roger Stone and guest speakers. But they
5 didn't really mention anything about law enforcement there.

6 Q And did that strike you as strange?

7 A Not really, simply because it didn't seem like a very well-organized group, to
8 be honest with you. It was literally a bunch of guys in a room, it sounded like, and it
9 wasn't a very coordinated or organized thing.

10 Q Okay.

11 And my last question on this topic -- and then I was going to move to a slightly
12 different topic --

13 A Uh-huh.

14 Q Are you familiar with any other -- did you interact with or are you familiar
15 with any other elected officials or government leaders who were involved with the Oath
16 Keepers, or did they meet with you while you were in the group or talk of meeting with
17 them?

18 A I wasn't aware that there were elected officials associated with the Oath
19 Keepers.

20 Q Okay.

21 A So, no. And like I said, the people they were going to do security for, they
22 mentioned guest speakers, I assumed those would be elected officials. They mentioned
23 Roger Stone, but I don't know who would've been speaking. So I don't know who they
24 were interacting with.

25 Q Okay.

1 So I'm going to shift a little bit to another topic that's kind of just, again, to provide
2 us background about how we should understand the Oath Keepers and everything that
3 happened leading --

4 A Yeah.

5 Q -- up to January.

6 So you mentioned personal security for Roger Stone, and you also mentioned that
7 part of the reason you felt that you wanted to join the Oath Keepers was because of the
8 chaos you described on national news and also approaching your hometown in Florida.

9 A Right.

10 Q So, when you're describing all that and describing personal security in
11 particular, what did you think the threat was, in your view, at that time? What were you
12 protecting against?

13 A Locally, I'd seen that the protests were going from, like, three people
14 standing with signs to a whole group and blocking the intersection and stuff. I had a
15 feeling it was going to grow to like you had seen on the news in some of these places
16 where violence might've ended up being the case, where they might be overwhelming an
17 area. So I expected they would continue to grow. But it actually did not continue to
18 grow.

19 Q And, then, in terms of who you thought the threat was, was it a particular
20 group of people, a particular movement?

21 A Oh, yeah. There's local BLM groups and antifa groups --

22 Q Okay.

23 A -- were the ones who were doing the protests.

24 Q Okay. And would that be the same thing as the threats you perceived
25 nationally when you were providing -- talking about providing events for Roger Stone in

1 D.C.? Are those the same groups --

2 A I was --

3 Q -- that you were worried about?

4 A Yeah.

5 Q Okay.

6 A All the riots and stuff I was seeing on the news all over the country seemed
7 to heavily involve those two groups, especially when you go to -- like, you look at the
8 CHOP zone and all that. And any of the riots on there always seemed to have either
9 BLM or antifa theme to them or origin or they talked directly about them.

10 Q So I'd like to delve into that a little bit more.

11 A Uh-huh.

12 Q What do you consider to be antifa? What are their goals?

13 A I don't know what their goals are. All I know is they always appear to be
14 guys in black outfits with shields and helmets and getting in fights with other people in
15 protests.

16 I did hear that, in previous rallies that they had had in Washington, that there
17 were people there that were harassing people, who claimed to be antifa and BLM. And
18 people were having problems getting back to their hotels and that.

19 But as far as who they are and what their goals, to be honest with you, I really
20 don't know, because you get mixed messages no matter what news source you look at.

21 Q And what news sources would you say you learned the most about antifa
22 from?

23 A Well, I'd flip through different ones on TV, so it'd be like your CBS, NBC, and
24 all of that. They'd also be some of the online ones; like, you'd get One America News
25 and Newsmax and all of those that would pop up online. And they all seemed to have

1 different messages about who was what and what was happening.

2 And it was kind of a confusing time. Definitely there was violence. Definitely
3 there were people committing violence. But the who's and why's were always kind of,
4 like, gray areas in all of the reports.

5 Q Thank you. That's really helpful.

6 So, I guess, if I could move a little bit, you also mentioned Black Lives Matter.

7 A Uh-huh.

8 Q Could you tell me why you also mentioned them?

9 A Yeah. In any of the stuff you saw on TV where there was a riot, there was
10 always BLM signs being held up. So that seemed like it was pretty indicative of the
11 potential people doing it.

12 Q So what do you view as the goals of BLM?

13 A You hear official goals, and the official goals are honorable goals always.
14 But when you get an organization that speaks honorable goals and then they go out and
15 commit violence, I think it kind of defeats their own credibility.

16 Q Uh-huh.

17 A So I think, like, with any organization, you have good people and bad people,
18 and I think the bad people kind of overshadowed what they were trying to do, the good
19 people.

20 Q And so did you view these two threats as you've described them as
21 connected?

22 A Not really. They may have been showing up in the same place and kind of
23 fighting the same or different fights, I don't know. But they always seemed to be
24 common elements whenever the riots were being televised.

25 Q Got it. So you don't perceive a kind of formal relationship between those

1 two groups.

2 A If there is, I doubt it. It doesn't seem like there would be. Maybe there is,
3 but I have no idea. They just seemed --

4 Q Okay.

5 A -- to be in the same place at the same time.

6 Q That makes sense. Thank you for explaining.

7 So, I guess, prodding you out a little bit, are there any other threats that you
8 thought were facing America and your community when you decided to join the Oath
9 Keepers?

10 A Not really. My primary concern was these protests growing into something
11 violent in my area that the police not having the capacity or being able to handle it based
12 on the number of retirements and people quitting and all that.

13 Q Okay.

14 A And whether or not that many people were, it certainly was -- we were given
15 the impression through the media that people were quitting left and right.

16 Q And do you think that other Oath Keepers felt similarly to you?

17 A I don't know. I believe so. It seemed like some people were just there to
18 talk, and some people had concerns for safety. And like I said, it was just like, you get a
19 room full of guys together, it's almost one step short of a barroom.

20 Q Sure.

21 So, if you could name just a couple of media figures throughout the past few years
22 that you feel are most influential in teaching you about the nature of this landscape of
23 threats, who would you be able to name?

24 A Media figures, no. Media sources? You seem to get a lot out of, like, your
25 Newsmax and your One America News. There's also some apps that you can download

1 that take AP news from all different sources and bring it together.

2 So it's mostly written stuff. I wouldn't say any individual news person, because,
3 basically, you could put them in front of me and I couldn't tell you their names. I kind of
4 don't pay attention to that.

5 But it's just kind of a scattering of news coming from a lot of different sources,
6 without anyone in particular being -- I don't hold any of them credible, to be honest with
7 you. And I'll come out and say that. Because everything they say, they contradict each
8 other and everybody else, so --

9 Q Totally fair position.

10 So I would like to move away a little bit to sort of broaden out the conversation to
11 talk about the role of the Oath Keepers in the country.

12 A Okay.

13 Q And, again, if you don't feel like you are in a position to answer any of these
14 questions, please just feel free to say so.

15 A Okay.

16 Q So do you consider the Oath Keepers to be a militia organization?

17 A They don't describe themselves as that, but, after the big mess that we've
18 seen, I don't know what they are.

19 When -- everything in the beginning sounded like they were not that. It sounded
20 like some of these community readiness organizations that you've heard about before,
21 the ones that volunteer when hurricanes happen and things like that. They sounded like
22 that.

23 But, given the fact that it went a path of they wanted to do personal security,
24 which made no sense to me because that didn't seem to fit what they were about, and
25 then any potential involvement they might've had in the mess that happened, I don't

1 know what they're about at this point, to be honest with you.

2 Q Okay. Do you know if other parts of the Oath Keepers, whether other
3 members -- or I guess, really, I'm wondering about other chapters of the Oath
4 Keepers -- did they organize themselves as militias?

5 A I don't know. I know lots of groups came from other parts of the country.
6 But I don't know how they organized themselves, who they are, what they do, because
7 most of my involvement was just watching the chats in the Florida chats.

8 Q Right. So you wouldn't have any knowledge of Oath Keepers training with
9 other militias.

10 A No, I wouldn't have any knowledge of that.

11 Q And how do you personally view the role of militias in the United States of
12 America?

13 A My personal opinion on the militias is, some of them have good ideas, but
14 they're a bunch of kids running around playing soldiers. That's what it reminds me of.
15 Because anytime you hear "militia," you see guys dressed up in camo and all the gear and
16 all that other stuff. And I -- you see a lot of news reports on; there's things online. And
17 they just seem like people who live in their own world and they run around the woods
18 pretending they're Army.

19 Q So you said some good ideas, you mentioned, that militias have. Can you
20 expand on that?

21 A Well, they always talk about patriotism and supporting the Constitution and
22 all that, and that all sounds good. Just like what the Oath Keepers did, it all sounds
23 good. But then all you see is a bunch of guys running around the woods in camo. So --

24 Q Good point.

25 So we mentioned earlier -- you and Mr. Quinn were talking about the Three

1 Percenters movement, and you said you were familiar with it. Would you consider the
2 Oath Keepers to be a part of the Three Percenters movement?

3 A Not really. Maybe people within it would be, but I wouldn't say the Oath
4 Keepers was part of the Three Percenters.

5 The Three Percenters, I think, are more or less the guys who walk around wearing
6 the patches and camo hats. And they talk a lot about patriotism and that, and maybe
7 they're militia, maybe they're not. But they just seem very -- very conservative in their
8 views on what they are. And -- I don't know. They just -- I have some unprofessional
9 words for it, like, they all seemed like a bunch of knuckle-draggers sometimes, but
10 I -- other than that --

11 Q So why do you say there was maybe some overlap between the Three
12 Percenters and the Oath Keepers?

13 A Because they talk a lot about patriotism, the Constitution, and all that, and
14 similarly -- some similarity and --

15 Q So, as far as you know, it was more ideological overlap and not necessarily
16 folks belonging to both organizations?

17 A Yeah, that would be a really good -- and if there's an ideological overlap,
18 there's potentially an overlap in membership. I don't know.

19 Q Uh-huh. Okay.

20 A But, generally, ideology -- people with the same ideology tend to group
21 together.

22 Q This is all really helpful.

23 Earlier, you mentioned citizen preparedness, and that was the reason why --

24 A Yeah.

25 Q So can you tell me more about citizen preservation teams or community

1 preparedness teams that the Oath Keepers may have been talking about?

2 A Yeah. And that has to do with, like, if there's a natural disaster, if there's a
3 hurricane, if there's an evacuation, assisting within that capacity. No real details on it,
4 other than trying to help people evacuate and help people get food and water and stuff if
5 there were problems. So that's the kind of stuff they talked about.

6 Q All right. So, during your time with the Oath Keepers, did they ever bring
7 up those operations?

8 A No. They talked about that being something they do, but I never heard
9 about them doing it.

10 Q Okay.

11 So, to your knowledge, do they still exist?

12 A I don't know. After January 8th, I kind of, like, totally cut ties, and I've had
13 zero contact, communication. I won't even look up some articles on them.

14 Q All right.

15 A Because, as far as I'm concerned, one, they're something I don't want
16 anything to do with, and, two, they're probably all disbanded because of what's going on,
17 which -- if not, maybe -- maybe they exist, maybe they don't. I don't even know at this
18 point.

19 Q Got it.

20 I had a couple of more questions about background before I handed --

21 A Yes.

22 Q -- it back over to [REDACTED]

23 So can you tell me, what are your overall impressions of President Trump?

24 A I think he was very strong ideology-wise in what he was doing. I think he's
25 a very savvy businessman and has proved that he's a very savvy businessman, and that he

1 may not have had, for lack of a better way to say it, the political savvy to cover some of
2 the political ends of what he should've been doing. But I think from a running things
3 from a financial perspective, I think he applied his business skills to the country, and in
4 many areas he was successful.

5 Q So you've kind of mentioned this already, but I was going to ask, why do you
6 think he was elected in 2016?

7 A In 2016. I think he said a lot of great things about how he could grow us
8 financially and as a country. And the whole "Make America Great Again" thing is an
9 awesome theme. And who doesn't want to make their country great, and who doesn't
10 want to get on top of things?

11 And a lot of the policies he talked about, like, with trade and getting the United
12 States ahead of the curve with trade and the economic balance sounded really good.
13 And I think that's what drew a lot of people to him. Because, again, it's applying what
14 he has a proven financial track record with, businesses, to the country. And it sounded
15 like a fresh change that nobody's done.

16 Q So, when he said "Make America Great Again," what did you think he meant
17 by that?

18 A Again, getting on top of all the trade deals. Maintaining, kind of,
19 superiority in the trade balance with China and other parts of the country. Being, kind
20 of, strong in the face of any enemies that we have.

21 I think just kind of making the United States more autonomous, especially when
22 you start talking about the energy and the oil and all that other stuff. It sounded like
23 making the country less dependent on the rest of the world so that we could grow in that
24 respect.

25 Q Okay. Thank you. That makes sense.

1 In your view, do you think that most Oath Keepers support, or at least supported,
2 President Trump?

3 A I think they supported him because of the position he was in and because of
4 it supporting their stance.

5 Personally, I think anybody who joins organizations like the Oath Keepers and
6 that, sometimes they're supporting ideologies, sometimes they're just filling a need to
7 belong to something and just doing their thing. And whatever the group thinks is a good
8 idea, they probably go along with it because the group think it's a good idea. So I think
9 you get a mix.

1

2 [2:57 p.m.]

3

BY [REDACTED]

4

Q Sure. So you said something interesting there. You said they thought

5

President Trump was supporting their stance. What did you mean by that?

6

A Well, they talk a lot about being patriotic and supporting the Constitution

7

and supporting the country, the whole Oath Keepers thing there, where they're very

8

pro-Constitution and very pro-America. That was a big theme during the Trump

9

campaign, was very pro-America. So I think that kind of aligned with a lot of their

10

thinking, at least for probably a bunch of them, but maybe not all of them.

11

Q Thank you.

12

And did any Oath Keepers in these chats, including Mr. Rhodes, ever talk about

13

doing work to support President Trump during his time in office?

14

A No. The whole level of the President was far removed from where they

15

were. I think that's why they were doing security for Roger Stone, because that's

16

probably as close as they could get.

17

Q Okay.

18

A You know, it wasn't an organization that's -- I don't know. I think they had

19

some kind of relationship there with lower-level people, and that's where they were.

20

Q Okay. Thank you. And --

21

A And that's all conjecture. I have nothing to --

22

Q Yeah, yeah. No, no, no.

23

A Just my opinion.

24

Q And we're just trying to paint as full a picture as possible.

25

A Okay.

1 Q So do you think there are other politicians that agreed with the Oath
2 Keepers?

3 A Probably, but I don't know of any in particular. I guess it's likely. And I
4 don't know if they agreed with the Oath Keepers or the Oath Keepers agreed with them,
5 type thing. To be honest with you, I'm not even convinced that most of the politicians
6 knew they existed until the big mess that happened.

7 Q Okay.

8 And then circling back to President Trump for one last question, do you think he
9 supported the Oath Keepers?

10 A I don't know if he so much supported the Oath Keepers as he supported
11 anybody who supported him, if that makes sense.

12 Q Sure. It sure does.

13 [REDACTED] All right. I think that was all I had for now, but thank you so much
14 for your answers.

15 The Witness. Okay.

16 [REDACTED] And I can hand it back to you, [REDACTED]

17 [REDACTED] Thank you.

18 BY [REDACTED]

19 Q Mr. Dockery, I wanted to ask you about one thing that you talked to [REDACTED]
20 [REDACTED] about. And maybe I misheard, but did you mention that you saw discussions or
21 heard discussions about Oath Keepers' presence in Louisville in the summer of 2020?

22 A Yeah, they had mentioned that they had been in Louisville, providing
23 security in Louisville.

24 Q Okay. And do you recall who had mentioned that?

25 A I think it was Gator 1.

1 Q And what did he say about his time in Louisville?

2 A Basically that they protected buildings from being burned down.

3 Q Do you know if they did any of the personal security work that they were
4 going to do for January 6th?

5 A I -- you mean in Louisville?

6 Q In Louisville.

7 A I didn't hear anything about it. Just basically protecting the buildings from
8 the rioters burning them down.

9 Q Okay.

10 Was that sort of activity -- I know you said that you weren't interested in doing the
11 personal security services, but what about protecting buildings or businesses during riots?
12 Was that activity that you were interested in joining?

13 A No, not at all, because that puts you in a very dangerous position, one,
14 because you're vulnerable, and, two, because my personal opinion is that's still doing
15 security work, and if you're not licensed and working for somebody who you're an official
16 "I can do security work" kind of guy, you can't do that. There's legal boundaries there.

17 Q Right.

18 Did part of your concern about Oath Keepers being there and doing that sort of
19 work -- were you concerned that they were sort of adding to the tension in those
20 situations?

21 A I think any situation where you've got people on opposite sides of the fence
22 who are kind of lined up against each other, you're going to have an increase in tension --

23 Q Right.

24 A -- no matter what it is.

25 Q Okay.

1 I want to shift a little bit and talk about, sort of, the lead-up to January 5th and 6th
2 and what your mindset was going into that time.

3 And so I know -- or I can't help but notice that November 6th is the day that you
4 joined. Obviously, that's close to November 3rd, the day of the election. Were those
5 related in your mind? Did you join the Oath Keepers as a reaction?

6 A Not at all. And one of the FBI agents asked me the same thing, and I was
7 surprised to learn that they were even close to that date. Actually, I think he said it was
8 on that date. And I had no idea. That was pure coincidence.

9 Q Okay.

10 Can you tell me what you remember about, kind of, your experience of election
11 day and the days that followed as it became clear that now-President Biden would be the
12 President-elect?

13 A It sounded -- well, to me, election day lasted from November through
14 January, because it was just this constant controversy back and forth. There was all
15 kind -- again, the news was going crazy. There was different theories all over the place.
16 And it sounded like nothing was even settled for about 3 months.

17 So it's a matter of -- I had no idea where it was going to end up, what it was going
18 to end up, but it was really something that was unusual. And, like I said, I feel like the
19 election lasted all the way through to January.

20 Q Did you have any other conversations with Oath Keepers about their
21 reaction to the election?

22 A No, but it was pretty typical stuff that you even see online, where people,
23 you know, were unhappy with it or they didn't feel it was right and all that kind of stuff.
24 But it seemed like a far more complicated position or situation than people were able to
25 even talk about.

1 Q And, then, also, I'd like to talk just for a second -- I know you touched on
2 sources of news that you used around this time. You mentioned Newsmax and One
3 America News.

4 A Uh-huh.

5 Q What were the social media -- or were there social media accounts or
6 activity that you followed around this time?

7 A You'd see stuff popping up in feeds on Facebook and stuff like that. But
8 you've got to take that stuff with a grain of salt, because it's not only filtered and twisted,
9 but it's -- whoever's putting it out there is kind of, like, doing their own thing.

10 Q Okay.

11 A You see a lot of that stuff out there. So that's why I was trying to look for,
12 like, legitimate news sources. But even the legitimate news sources didn't agree.

13 Q So you used Facebook at the time?

14 A Yeah. I'd go onto Facebook and look around, and it was just a bored
15 cruising thing.

16 Q Were you on Twitter at all?

17 A No. No, I don't do Twitter. I might have a Twitter account, but I don't
18 even use it.

19 Q Understood.

20 So I think we've gone over this, but there were rallies in Washington, D.C., in
21 November and December --

22 A Uh-huh.

23 Q -- and the Oath Keepers had a presence at those rallies. You never saw
24 anybody discuss earlier rallies?

25 A No. Discussions of earlier rallies came, one, from the news or, two, from

1 things people put out on Facebook and, you know, pictures and videos of it. But,
2 interesting enough, I never heard anything within the Oath Keeper chats about any of the
3 previous rallies, so only that the one coming up was supposed to be the largest one, but it
4 didn't sound like they had had a presence or an attendance there.

5 Q And when you say "the one coming up," did you mean the January --

6 A The January 6th one, yeah. They were holding that as the biggest one so
7 far.

8 Q When did you start thinking about coming up to D.C. for the rally?

9 A Middle of December, when they started promoting the big one in January 6th.
10 They were saying it's the largest patriotic rally. The Oath Keepers were going to make a
11 presence. They were going to stand around flag-waving, just make a presence.
12 Nothing as far as even, at that point, Roger Stone or anything. It was just going to be,
13 like, a flag-wave-type presence.

14 Q So when you say "they," you mean the Oath Keepers were promoting --

15 A Yeah.

16 Q -- the January 6th rally?

17 A Yep. Recruiting people to go up just to making a showing, "Hey, we're
18 here, we support Trump," all that kind of stuff.

19 Q Did you ever hear President Trump promote that rally?

20 A Yeah, on the news, he was talking about the rally on January 6th. And, you
21 know, that was something that was pretty widespread.

22 Q Okay. And do you recall any specific instances of President Trump talking
23 about January 6th as an event?

24 A Just that it was going to be the largest rally and it was going to be a big rally
25 and trying to get everybody up there.

1 Q I know you said that you weren't on Twitter. Did you see President
2 Trump's tweets just online or through some other method?

3 A The tweets, no. Sometimes the tweets would get published on Facebook
4 and stuff. But, again, you'd get, like, partial pieces of tweets and that, and it always
5 sounded like just off-the-cuff stuff.

6 Q I'd like to pull up one tweet for you quickly.

7 [REDACTED] it's exhibit 12, if you can pull that up.

8 And this is a tweet from President Trump on December 19th. And I'm just
9 curious about whether or not you saw this tweet or are familiar with it.

10 A Okay.

11 Q Do we still have [REDACTED] or maybe [REDACTED]?

12 Okay. We'll move -- oh, there we go. So if we could zoom in on that a little bit.
13 There you go. I think that's good, as long as we can see the text of that.

14 If you'd just take a second and read that tweet.

15 Do you recall seeing that tweet from President Trump?

16 A I don't recall seeing that one.

17 Q Okay.

18 I want to get a high-level, kind of, understanding of the dates of how things
19 worked, and then we'll kind of come back and get some more detail on it.

20 But I understood you joined the Oath Keepers on November 6th?

21 A Correct.

22 Q You said that you began thinking about attending the November (sic) 6th
23 events -- was it the middle of December?

24 A Yes.

25 Q Okay.

1 And then I know at some point you booked travel to go to November -- or to the
2 January 6th rallies. When did that happen?

3 A December 24th, I booked a hotel room in D.C. I believe it was the Hilton
4 Garden Inn. But I didn't book travel or flights or anything. It was just the hotel room.

5 Q Just the hotel.

6 And around that time did you tell other Oath Keepers that you were going to be
7 going to the January 6th event?

8 A Yeah, they asked who's going, and I said, yeah, I'm going. Uh-huh.

9 Q And who asked you that?

10 A I don't know in particular. I know definitely it would've been Gator 1, but I
11 don't know about anybody else.

12 Q And, then, so you booked that on December 24th. Do you remember a
13 date or a time that you told the Oath Keepers? Was it before or after you booked the
14 hotel?

15 A Probably before.

16 Q Okay. And did you pick that particular hotel for any reason?

17 A They recommended that one. They said that there were rooms available.
18 They were going to book a block of rooms, but I didn't want to be part of a block of
19 rooms, so I just booked my own thing.

20 Q Okay. And why didn't you want to be part of a block of rooms?

21 A I generally don't like doing that. It almost feels like room-sharing and stuff.
22 I traveled a lot for work, and I've always made my own arrangements and always done my
23 own thing. And so it's -- I don't like people booking rooms for me, to be honest with
24 you.

25 Q Okay. So was it just that, sort of, I'll just call it kind of a privacy concern, or

1 were you also attempting to distance yourself from Oath Keepers at that point?

2 A I didn't know any of them, really, and it's not like we were buddies or
3 anything. So, until I know people and that, I just wanted to do my own thing.

4 Q Okay.

5 And then when did you cancel your trips -- or your travel arrangements?

6 A January 1st.

7 Q And the last date I'll ask you about to try to identify -- when did you inform
8 the other Oath Keepers that you were not going to be going to D.C.?

9 A After one of the organizational meetings. I think it was August -- not
10 August, I'm sorry -- December 31st. It could've been the 30th, but I think it was the
11 31st, there was an organizational meeting. And it was after that meeting I sent a thing
12 to Gator 1 saying that I'm not going to D.C.

13 Q Okay. Let's talk about that organizational meeting --

14 A Uh-huh.

15 Q -- one more time. You said it happened on December 30th?

16 A I think it was the 31st, but it could've been the 30th.

17 Q Okay. And did that organizational meeting happen over Signal, or how did
18 that happen?

19 A I think it was a GoToMeeting.

20 Q And who else was at that meeting, to the extent you remember?

21 A It was Gator 1, a bunch of other people who said they were going to D.C.,
22 because it was kind of an organizational meeting. And I did hear eventually people from
23 out of State, a different group.

24 Q And do you know which State they were from?

25 A I thought it was Ohio, but I can't swear to it.

1 Q And how did you learn about the organizational meeting?

2 A It would've been put out in one of the Signal chats, they were going to have
3 an organizational meeting.

4 Q Whenever that was put out, did you then say that you were going to
5 participate? Or was it just a, kind of, join the meeting --

6 A You just get the link information and that, and you just go in.

7 Q And what was discussed at that meeting?

8 A That's when they said that we weren't just going to be doing, like, a flag
9 wave, that we were going to be doing security for Roger Stone and some of the speakers.
10 And there was a lot of discussion on that and how that was going to occur.

11 I did ask a few questions on how that would be, because, again, you can't just do
12 security, especially out of State and that, because I'm familiar with that process, and you
13 have to have licensing and be employed and all that. So I asked questions about that.
14 And the answers basically kind of told me they didn't know what they were doing and
15 there was going to be potential problems.

16 Q And was there somebody that was leading that meeting?

17 A Gator 1.

18 Q Anybody else that seemed to be in a leadership position during that
19 meeting?

20 A No. There weren't many people in a leadership position at all to begin
21 with. It was always either him or Chaos, when he was there -- Chaos.

22 Q Right. Was Stewart Rhodes in that meeting?

23 A I think he might have jumped in, like, once or twice for about a minute, just,
24 you know, "You're doing good, guys; keep going," that type of thing. It really was
25 meaningless.

1 Q So, if it was Meggs running that meeting, was this just -- this was just Florida
2 Oath Keepers on that meeting?

3 A I assumed it was Florida until somebody mentioned, I believe it was Ohio.
4 So I assumed it was Florida until they started talking about "we're coming in from" and I
5 believe that was Ohio.

6 Q Okay. So they were also in the meeting. It wasn't just --

7 A Yes.

8 Q -- a discussion about coordinating with them.

9 A Right.

10 Q And were there any other goals or objectives that they discussed other than
11 providing personal security for individuals on that day?

12 A No. It was getting people to the podium on time, protecting the speakers
13 from any kind of problems with the crowd, helping people get back to their hotels, things
14 like that. That was the motive of supposedly what they were going to be doing.

15 Q Around that time when you were in the meeting, did you understand that
16 January 6th was the day that the electoral college votes would be certified?

17 A My understanding, it was the final step in determining closure on everything
18 with the election. That was where final, we're done, the election results are these, and
19 move forward.

20 Q And was that discussed in the meeting at all, the connection between the
21 date of the event and the electoral vote certification?

22 A It probably was in the meeting, but I know I heard it on the news as well, so
23 I'm not sure where I know it from. So it probably was mentioned in there.

24 Q Did you ever have any other discussions around that time or before you
25 went to the January -- well, before you canceled your plans -- with any other Oath

1 Keepers about why they were going to January 6th or what their goals were?

2 A No. It seemed pretty adamant that it was doing the protection thing.
3 They were talking about how they were going to do it and all that, and I didn't hear
4 discussion on anything beyond doing the security role. That's why when it actually
5 happened it seemed like a really far jump from the security role to, you know, a riot.

6 Q So, then, am I basically understanding correctly -- I just want to, kind of,
7 summarize that a little bit.

8 A Yeah.

9 Q You had started to think mid-December about going to January 6th. You
10 booked some travel around the 24th. And then, really, the only event that occurred was
11 you joined this meeting, heard about what was going to happen, and then immediately
12 decided not to attend January 6th.

13 A Well, there was another element of it, because when we were talking
14 about -- I asked, how are you going to do this? And they talked about, well, we're going
15 to surround the speaker and push through the crowds and that. And I asked them,
16 what's the plan if the crowd turns violent? It's an emotionally charged crowd; you're
17 pushing through a crowd. And I was told that there was a quick reaction force in
18 Virginia that would come in and help them out of whatever the problem was and that
19 they would have firearms.

20 And that was a definite: I am not going anywhere near Washington on this thing.
21 There's no way I'm going. It's just a recipe for trouble.

22 Q You mentioned that you sort of brought up the issue of what would happen
23 if there was some violence.

24 A Yes.

25 Q What led you to believe that that was a concern?

1 A Because they're talking about -- I asked, well, if you're pushing through a
2 crowd, why would you do that? Why wouldn't you just take whoever it is you're trying
3 to get there and go around the crowd and come in from a different direction, do
4 something like that, because it's just -- it's common sense and maybe beyond common
5 sense, I don't know, that if you're trying to get somebody safely to a certain spot, you're
6 not going to push them through a crowd of highly charged people.

7 Q I'd like to get a little bit more detail on what exactly they were discussing
8 would happen on that day or where you would need to push through a crowd.

9 A Uh-huh.

10 Q To the extent you understood, how was the movement of people or the
11 people that they were protecting going to work? Where were they going to go that
12 day?

13 A It was going to start at wherever their hotel was, and they would be
14 surrounded by Oath Keepers, and the Oath Keepers would push right down the main
15 street to wherever the podium was to get them to the podium. And they had a certain
16 amount of time, because I guess there was a schedule of speakers.

17 Q Do you know, was that podium the speeches that occurred at the Ellipse?

18 A I don't know. They said there were multiple podiums along main street,
19 but I have no idea how many or where or what. I don't know how it was set up. I'm
20 not even sure what "main street" consisted of, so --

21 Q How about, was there any discussion of movement from the speeches or the
22 podium to the Capitol?

23 A Not at all. It was strictly about getting people where they needed to be to
24 give their speeches on time.

25 Q Did they discuss at all where they would go after the speeches were over?

1 A No, not at all. In my understanding, there was supposed to be, like,
2 multiple speakers so that they were going to be busy shuffling people around.

3 Q And just to be clear, you don't remember if they talked about where they
4 would go after the speeches, or you recall and that was not discussed at all?

5 A I don't remember it being discussed at all. I'd say the closest thing to
6 "after" would be helping people get back to their hotels. But as far as what they would
7 do once they're done bringing people to the podiums, I don't remember any conversation
8 on that. And that could've been in later meetings and stuff, too, but that was kind of my
9 final meeting.

10 Q Okay. Do you know if there were any other specific meetings?

11 A They talked about having other organizational meetings, but I didn't attend
12 any of them. And when I told them I'm not going to Washington, that was kind of the
13 last meeting I attended.

14 Q Did -- these sound like the events and the speeches on January 6th. Were
15 any events or speeches for January 5th discussed at that meeting?

16 A I think -- well, Roger Stone, of course. They were also talking about -- I
17 think General Flynn was going to be speaking. They said there were some Congressmen
18 that were going to be speaking, but I didn't have any of the names of them.

19 Q And did they say that they were also going to be providing security for the
20 Members of Congress that they mentioned?

21 A They said anybody who was going to be speaking. "Roger Stone and the
22 other speakers," they said. So anybody who was speaking at the podiums were going to
23 be the people they were going to be escorting to the podiums.

24 Q Okay.

25 [REDACTED] [REDACTED] I saw you come on the screen for a second. Did you have

1 a question?

2 [REDACTED] Yes. I can follow up with more of them at a later point, but I just
3 wanted to ask one followup question on this line of questioning.

4 [REDACTED] Sure.

5 BY [REDACTED]

6 Q You mentioned earlier that there was discussion of the Oath Keepers
7 planning to have firearms in the crowd in order to protect the speakers if things got
8 violent.

9 Was there any conversation about the prohibition of firearms in Washington, D.C.,
10 in the context of that strategy?

11 A Yeah, one correction. They were in a hotel in Virginia, outside the city.
12 They did say that they would -- if there was violence, that they would come in to help.

13 As far as other discussion of firearms in the city or that, that was --

14 Q Okay.

15 A -- pretty much it.

16 Q So the firearms was for the quick reaction force, not for --

17 A Yes.

18 Q -- the Oath Keepers -- okay. That makes sense.

19 A Yep. And I don't know if the quick reaction force was Oath Keepers or not,
20 but I assumed that that was the case.

21 Q Okay.

22 A So -- yeah.

23 Q That's fine. That's all I had right now.

24 A Okay.

25 BY [REDACTED]

1 Q So I wanted to move -- I know you talked about the violence being a concern
2 and then weapons and the quick reaction force. So if we can just go into a little more
3 detail on what you heard in that meeting about the quick reaction force.

4 Mr. O'Brien. Hey, [REDACTED] This is Attorney Mark O'Brien. Sorry to interrupt.
5 It's been about an hour and a half.

6 Richard, do you need to take a break for any reason? A convenience break,
7 water break, anything like that?

8 The Witness. I brought water with me if we
9 want to just plug through and get it done. But if anybody else needs a break, I'm more
10 than willing, or if you need a break, Mark.

11 Mr. O'Brien. No, I'm just concerned about you, brother. That's it. So --

12 The Witness. Oh, no, I'm doing good. I've still got some water left, so thank
13 you.

14 Mr. O'Brien. All right. I'm going to go ahead and mute myself, and have at it,
15 Counsel.

16 [REDACTED] I'll actually make the decision easy. Why don't we take just a
17 3-minute break real quick? So let's come back at 3:25.

18 The Witness. Okay.

19 [REDACTED] Okay. Great.

20 [Recess.]

21 [REDACTED] Okay. We can go back on the record.

22 BY [REDACTED]

23 Q So we were just talking about the quick reaction force and what you heard in
24 that GoToMeeting, kind of, about Oath Keepers bringing weapons to January 6th.

25 Can you just go back and tell me what you recall was said about the quick reaction

1 force?

2 A Yep. They were in a hotel in Virginia. I don't remember what the hotel
3 was. They did say they were the same people who did it for them for Louisville. And
4 they didn't say who they were or anything like that. But they said that if the crowd did
5 turn violent that they would come in and help.

6 Q The "they" you're talking about, is that other Oath Keepers?

7 A Gator 1.

8 Q Sorry. Say that one more time.

9 A Gator 1.

10 Q Gator 1. But you said whoever organized the hotel was the same person
11 that did it for Louisville?

12 A That's what they said. The quick reaction force was the same people who
13 did it for them for Louisville.

14 Q And was there any description of what the quick reaction force was for?

15 A Just in case things turned violent, they were supposed to come into the city
16 and help the Oath Keepers who were guarding Roger Stone to get out of there.

17 Q Okay. And did you get a sense for how they were supposed to help them?

18 A No, because it didn't make sense to me. And I actually did say something
19 about that. It's like, if you've got a giant rally going on and things are violent and all the
20 roads are blocked and that, nobody's going anywhere, so that doesn't make sense.

21 Q Who were the folks that were coordinating for the quick reaction force?
22 We had Florida, obviously, in the chat. And then was it just the Ohio folks that you
23 remembered, or were there other groups involved in this quick reaction force
24 coordination?

25 A My understanding is, all of the stuff was coordinated in Florida. It didn't

1 sound like the people who said they were from Ohio were coordinating anything; they
2 were just coming. It sounded like the only person doing any coordinating was from
3 Florida.

4 Q Okay.

5 And then how about coordination with Mr. Rhodes? Did anybody discuss that?

6 A No. No. Again, that would only be assumptions on my part. If
7 whoever's leading Florida is coordinating anybody else out of Florida, I don't know -- or
8 with that. But that's total assumption. I have no idea.

9 Q And am I remembering incorrectly? Did you say Mr. Rhodes did pop into
10 this conversation at some point --

11 A Uh-huh.

12 Q -- or was that another chat?

13 A Yeah, probably once or twice. And it was just kind of a, you know, "go,
14 team, go"-type attitude and not really anything of any significance.

15 Q Okay. So, when he was in the meeting, was the conversation about the
16 quick reaction force happening?

17 A No. It was more or less about doing the security for Roger Stone, which
18 was a little bit earlier into that.

19 Q How long did this meeting last?

20 A If I had to guess, because I don't remember exactly, probably about an hour
21 or so. But I don't remember for sure.

22 Q We talked a little bit about where the quick reaction force was and what its
23 purpose was. You also mentioned that there was some discussion about bringing
24 weapons or guns to the quick reaction force location. Can you expand on that a little
25 bit?

1 A Yeah. They would have firearms. Nobody was going to have firearms or
2 weapons inside the city, but the quick reaction force would have firearms in case they
3 had to assist.

4 Q And did they say why they weren't bringing firearms into the city?

5 A Because it was illegal to have any kind of firearms in Washington.

6 Q And do you know if anybody did, in spite of that law, bring a firearm into
7 D.C.?

8 A I have no idea.

9 Q And, you know, I just want to ask, as you're hearing this conversation and,
10 obviously, you had some concerns about violence and the use of this quick reaction force
11 and their weapons --

12 A Uh-huh.

13 Q -- did you ever consider reporting any of this activity to anybody?

14 A I didn't know how much of it was real, to be honest with you, because Gator
15 1 was a talker, and half of what he said sounded like he was just pulling it out of
16 somewhere. And it really -- I didn't know how much of it was just people boasting or
17 talking and how much of it was real or even how much of it was even legal and whether
18 or not people in Virginia having guns was legal. I had no idea. I knew you couldn't
19 have it in Washington.

20 And it sounded like, if they're going to do their security role and they do need the
21 quick reaction force, it ain't going anywhere. So it's -- it just seemed like -- you know,
22 it's almost like storytime at some cases.

23 Q Was there a point -- and we'll go into a little more detail on January 6th in a
24 little bit. But was there a point that you realized that it wasn't storytime or that these
25 people were more serious than you originally thought?

1 A Well, I did log in on January 6th, somewhere in the middle of the day, to see
2 what was going on, and I logged in to the chat. And I saw a little video posted of a group
3 of people walking towards a very large door and the whole crowd kind of going through
4 the door. And the person with the camera wasn't at the door yet, but there was a
5 whole crowd going through. And it was posted by Gator 1, and underneath it he had
6 put, "Oath Keepers take the Capitol."

7 It didn't say anything about firearms or anything like that, and I hadn't heard
8 anything about firearms. But it did take me by surprise that, how do you go from "we're
9 protecting Roger Stone" to "Oath Keepers take the Capitol" and walking through a big
10 door.

11 Q Okay.

12 Around this time, mid-December, and then into late December, there were some
13 communications from Mr. Rhodes and from the Oath Keepers that were posted on the
14 website. There was a letter on December 14th, for example, that we can discuss
15 quickly.

16 Do you recall any of those letters to Trump or calls to action that Mr. Rhodes
17 posted?

18 A Once we started using the chats, I didn't go back to the web page after that.
19 It just -- the web page was kind of, like, there really wasn't anything there. So I'd go into
20 the chat, see what was going on with the chat, but I never really circled back to the Oath
21 Keepers' formal website.

22 Q Let's -- I'm just going to have one of these open letters pulled up, and you
23 can tell me if you recognize it, and then we can just discuss it a little bit.

24 A Okay.

25 Q If we can pull up exhibit 4. And if you can just zoom in a little bit. And

1 just zoom into the date of this letter for a second, which I believe is December 14th.

2 And the title we can read.

3 And can you read that?

4 A Yes. And I've seen that headline on Facebook, but that's about it, because I
5 did see that on Facebook.

6 Q Okay. I can just -- well, just from the title, you can tell it was an open letter
7 to President Trump, and Stewart Rhodes has posted it. And it says, "You must use the
8 Insurrection Act to stop the steal and defeat the coup."

9 Had you heard -- well, had you heard any discussions about the Insurrection Act
10 with the Oath Keepers?

11 A No. Like I said, I did in social media, but I didn't in the chatrooms.

12 Q How about any conversations about civil war or an actual battle happening
13 on January 6th?

14 A No, nothing about that.

15 Q And, then, if we can scroll down to the last page.

16 This letter was signed -- or I can just tell you -- well, so this exhibit 4 December
17 14th letter was signed by both Stewart Rhodes and a woman named Kellye SoRelle.

18 Do you know who Kellye SoRelle is?

19 A I have never heard that name.

20 Q Okay.

21 We can actually just take down exhibit 4. Thank you.

22 And then let's pull up exhibit 6. So this one is an email that you produced to us,
23 and this is a January 4th email that I think you mentioned briefly --

24 A Yes.

25 Q -- earlier. And so you recall receiving this email?

1 A I do.

2 Q Okay. And what is your recollection of your reaction to this email, or what
3 did you think of it when you received it?

4 A When I was reading through it, it was -- they're talking about security.
5 They're talking about doing the Roger Stone thing, helping people get back to their hotels.
6 That seemed to be the general theme of it.

7 I'm not sure I read every bit of it, because it looked kind of enormous. But from
8 what I was getting out of what I read on it, it seemed consistent with the planning
9 meeting they had had in August -- December.

10 Q And if we can -- oh, sorry. Go ahead.

11 A It was December, not August. I don't know where I'm getting August from.

12 Q And if we can go to page 3 of this exhibit, there's just a little bit of text that I
13 wanted to ask you about specifically.

14 A Okay.

15 Q There's a portion that's below that photograph, if you can scroll down a little
16 bit more. Yep, that paragraph right there. There's a portion where Mr. Rhodes, or the
17 author of this email, writes, "If you would like to support our work, please consider
18 making a donation to help us cover the considerable costs of gas, airfare, hotels, food,
19 and equipment for our men. Every little bit counts."

20 I take it that you didn't make a donation?

21 A No. No.

22 Q Do you remember similar asks for contributions or donations around these
23 events?

24 A I remember in the chatroom it was mentioned once, that they would need
25 donations for, like, food and stuff. But that is definitely not something I would've threw

1 any money at for sure.

2 Q Okay. And do you remember who was asking for those food donations?

3 A It might've been -- I can't swear to it, but it might've been Gator 1 because
4 he kind of, like, led the meetings. But I have no -- nothing to back that up.

5 Q Okay.

6 Any other specific fundraising efforts, more specifically kind of looking at actual
7 cash or money donations for any events, January 6th or anything else?

8 A No. Just the membership fee that you pay upfront.

9 Q Okay.

10 Let's go back to, kind of, your thinking originally when you had planned to go to
11 January 6th.

12 A Uh-huh.

13 Q Separate from what the Oath Keepers' goals were on that day, did you have
14 your own kind of personal idea of what you wanted to do that day or what kind of
15 statement you wanted to make by going?

16 A It sounded like it was just going to be like a big flag wave. And they've had
17 lots of flag waves even locally, like, to support the Second Amendment and that. And,
18 basically, you stand around, you have your American flag, maybe one of your
19 two-way-flag-type things, and you just be a part of the crowd and be a part of the rally
20 because it was going to be the largest thing going and -- so very, kind of, low key, hang
21 out, do nothing, show support, and see where things go as far as, you know, any speakers
22 or whatever.

23 Q And had the Oath Keepers said that that's what the event was going to be
24 like, or that was what you thought?

25 A Yeah. That was earlier in December when they were first talking about it.

1 That's pretty much all they said about it.

2 Q And do you recall when the narrative changed to the personal security?

3 A I believe it was in that organization meeting when they announced we're
4 going to have a job to do and not just stand around and be patriotic. And that's when
5 they started talking about that.

6 Q And, then, we've touched on the events of January 5th and 6th a little bit,
7 but can you just tell me what you thought those days were going to be like, what sort of
8 events were going to be held there?

9 A I figured it was just going to be a bunch of speakers. We'd get updates as
10 far as whatever the process is they're doing to close out the election. And it was just
11 going to be standing around. Maybe, like, food vendors and stuff. Kind of like when
12 you go to the Trump rallies. I don't know if you've ever been to one of that, but it's
13 really just a lot of speeches and hanging around listening with other people.

14 Q And did you have any understanding about who was organizing these events
15 on --

16 A No.

17 Q -- the 5th and the 6th?

18 A No. I figured whoever it was that organizes all the Trump rallies probably
19 did it.

20 Q Are you familiar with "Stop the Steal"?

21 A I've heard of "Stop the Steal," yeah, on social media.

22 Q Okay. And did you understand if there was any connection between "Stop
23 the Steal" and the events on January 5th and 6th?

24 A I don't know if there was a connection. I know that they were the ones
25 promoting the fact that the election was stolen or whatever. But I don't -- I would

1 assume they were probably going to be there, but I don't know if there was a connection
2 of organizing it.

3 Q Do you remember where you learned about "Stop the Steal"?

4 A Probably Facebook. Unfortunately, that's too easy a source of
5 misinformation right now that everybody gets right in front of their faces, so --

6 Q It is difficult to avoid that sometimes.

7 A Yeah. You try to keep up with what your kids are doing and you get
8 bombarded with politics.

9 Q Right.

10 Did you know -- or, do you know who Ali Alexander is?

11 A No.

12 Q And so, then, I take it you didn't hear any discussion or that name wasn't
13 connected to any of your Signal chats with the Oath Keepers?

14 A No. I've never heard that name, actually.

15 Q If we can just talk about that December 30th or 31st GoToMeeting and any
16 other conversations you had with the Oath Keepers, I just wanted to go through any, kind
17 of, motivations or purposes that you heard Oath Keepers discuss for attending the
18 January 5th and 6th rallies.

19 Did you hear people discuss being angry about the election being stolen as a
20 motivation for going?

21 A I heard people talking about being angry about the election being stolen. I
22 heard them talk about the -- because it's the biggest rally.

23 But, yeah, there's all kind of opinions. Like I said, you get a whole room full of a
24 bunch guys talking about things, and some people are happy, some people aren't happy.
25 You've got people who don't think things are going the right way. You've got other

1 people who kind of had opinions that didn't even sound like they were in the same
2 meeting. It was just kind of all over the place.

3 Q What were the opinions that were expressed that made it sound like they
4 weren't in the same meeting?

5 A They'd be talking about ridiculous things like what's going on in their
6 personal lives, and it's like, who cares?

7 Q How about concerns about antifa being at the January 5th or 6th rallies?

8 A There was mention that they would probably be there because they were at
9 previous D.C. rallies and that there had been problems at previous D.C. rallies with them.

10 Q And we talked about the fact that January 6th was the day that the electoral
11 college votes would be certified. Did you hear people discuss Vice President Pence's
12 role in that process?

13 A I think he was either coordinating it or validating it -- it was something along
14 those lines -- and that he would be, like, tallying the count or whatever. He was kind of
15 leading the show, I think. And that's my understanding from what I heard there and on
16 social media. And it's just -- I don't know exactly what the process is, but I know he was
17 a leader in it.

18 Q And was Vice President Pence's role discussed -- I just want to get a little
19 more specific -- at the December 30th/31st GoToMeeting?

20 A No. They may have talked about, he's going to be, like, counting the votes
21 or something like that, but other than that, no.

22 Q So those discussions happened in the Signal chat, you think?

23 A Yes. Very likely.

24 Q So did you -- I know you joined the GoToMeeting.

25 A Uh-huh.

1 Q Was there any other way that you expressed interest or willingness to
2 participate in those January 5th and 6th events?

3 A Not really, no.

4 Q Did you sign up on a -- for example, did you sign up on a list of people that
5 were going to go?

6 A I just said I'd like to go. They were talking about who wants to go, and it's
7 like, I'd like to go.

8 Q Okay.

9 I wanted to ask you just quickly about an email that we have. This isn't one that
10 you produced to us. It's exhibit 7, if you can pull that up.

11 A Okay.

12 Q Do you know who Stephen Brown is?

13 A I don't.

14 Q That name? Okay.

15 Once this is up, we can look at this quickly together.

16 And, then, if you can zoom in just on that top part of that email first.

17 A Okay.

18 Q So we just discussed Ali Alexander, and I know you don't recognize that
19 name. He's associated with "Stop the Steal," the organization. And this is an individual
20 named Stephen Brown, who was forwarding to Ali Alexander a list of Oath Keepers who
21 would be involved in providing personal security services --

22 A Okay.

23 Q -- on the 5th and 6th.

24 And then, [REDACTED] if you can scroll down to the -- there's a list of names. Right
25 there. That's great.

1 A Uh-huh.

2 Q And, then, if you just scan this list of names quickly, I think you'll see that
3 your name appears there, Richard Dockery.

4 A Yep.

5 Q And, then, is "DeStokes" your Signal chat name?

6 A Yes.

7 Q Okay. And so you've never seen this list before, or this doesn't look
8 familiar?

9 A I assume that anybody who said they're going, they automatically signed up
10 to be doing what they're doing. This is probably the list of people who were going.
11 But I've never seen a list of anybody going.

12 Q If we can -- [REDACTED] if you can just either zoom out or slowly scroll so that
13 Mr. Dockery can see the folks on the list.

14 And tell us if you are not able to read that.

15 A I can see that.

16 Q Okay. And does that look like a list of the folks that were at the
17 GoToMeeting? Or do you have any insight into how this list was created?

18 A I think there's only one other name I recognize.

19 Q Take a minute to review it, and then we can talk about it.

20 A Yeah, there's only one other name I recognize on there.

21 Q Okay. And who is that?

22 A Kenneth Harrelson.

23 Q Okay. And what do you know about Kenneth Harrelson?

24 A I know that it's Ken from Titusville, and he was Gator 6. And that's about
25 all I know from him. I think at one point it was said that in Washington Ken would be in

1 charge, but I'm not sure what that meant.

2 Q And then did you ever see Ken acting in that role, in charge of anything that
3 was going on on January 5th or 6th?

4 A No -- well, I had no involvement there. My last meeting was that
5 organizational meeting. But he really didn't say much of anything, to be honest with
6 you.

7 Q During that meeting?

8 A Yeah, he was kind of a -- kind of quiet.

9 Q We've talked -- and this is probably a good time to get to it -- we've talked
10 about various Signal chats that you were on, and you mentioned that there was a Signal
11 chat created for folks that were going to Washington.

12 A Yes.

13 Q Can we try quickly one more time just to run through the Signal chats that
14 you remember --

15 A Uh-huh.

16 Q -- participating in, and then, to the extent you remember names, let's do
17 that. Was it just one Signal chat for folks going to Washington?

18 A There was one organizing for Washington. There was a Southeast regional
19 chat. And there was a Florida chat. But I think there was only one for those going to
20 Washington.

21 Q And do you remember when you joined or the one for going to Washington
22 was created?

23 A Somewhere in the middle of December.

24 Q And did you get -- how did you -- do you know how that chat got created?

25 A They'd send a link and say, join this chat. If you're going, join this chat.

1 Q And did you participate in that chat or -- well, I'll just ask that. Do you
2 remember participating much in that chat?

3 A I remember going into that chat, because that was also used as part of the
4 GoToMeeting, but I don't know how much participation I did in that chat or not. It
5 wasn't a very long time that it was in existence when I stopped doing anything.

6 Q Do you recall, if you joined the chat after it was established, did you get
7 the chat that had occurred before? Or did you just see what happened after the point
8 that you joined?

9 A You kind of see what happens after the fact, because they have, like, an
10 expiration on the chat. So it's, like, every so many hours, whatever things are that old
11 go away. You know what I mean?

12 Q Yes. Right. So, after a week or two or a month, the old chats start
13 disappearing?

14 A More like 6 hours.

15 Q Six hours. Okay.

16 A Yeah. It was a short of amount of time so that anything that hit that age
17 would be deleted.

18 Q Okay.

19 If we could pull up exhibit 11.

20 Okay. And this here, you can see, basically, it's sort of the introductory cover
21 page of that chat. Is that the one that you're talking about?

22 A On the "OK FLA DC Op Jan 6," looks like the right one. I don't know if that's
23 the same picture or not, but the words look the same.

24 Q Okay. And just describe to me how you monitored this chat or how often
25 you read it. How active were you on it?

1 A I'd just go in randomly, see what was going on and if there was anything
2 going on. I'd talk if something was interesting. Otherwise, just check it out and you go
3 back out.

4 Also, that's the one I believe that I went into and saw the video posted on the 6th.
5 And I think this is the one that was kind of open during the GoToMeeting.

6 Q And what was happening during the GoToMeeting in the chat? Were
7 people also talking at the same time in the meeting --

8 A Yeah. They just kind of chat. Like, either they're not paying attention to
9 what's happening in the meeting or they're just having sidebars.

10 Q Okay.

11 And how about on the days of the 5th and the 6th? Do you remember if you
12 monitored these chats?

13 A I don't believe I went on on the 5th at all, but I went on on the 6th just to see
14 what was going on. And I don't think I was on there more than 5 or 10 minutes. I saw
15 the video, and I just got out of the chat.

16 Q Do you remember when on the 6th that was?

17 A Somewhere in the middle of the day. Probably a little bit after noon or so.
18 Anywhere between, like, noon to 2:00 or something, because that's generally when I take
19 a lunch and see what's going on.

20 Q If we can just take -- hold on -- a break for one second.

21 A Sure.

22 Q Other than monitoring the chat, why don't we go through just, kind of, your
23 experience of January 6th. Were you watching any other news sources, or did you
24 monitor the events in any other way?

25 A After I saw that, I did go to some of the news stuff, and it looked like there

1 was a big riot that had started there. I think they posted some picture of the guy with
2 horns standing in the Senate or something like that. And I saw that something had
3 happened. It was a riot. There were people inside the Capitol Building. And that's
4 about all I saw.

5 And I think the next day it was all over the news, as well, but I didn't watch much
6 of the news. And it was on the 8th that I said, I don't want anything more to do with
7 you guys.

8 Q Understood.

9 On the 6th, I know you had heard from the GoToMeeting and in the Signal chats
10 that the Oath Keepers would be providing security for people who were speaking at
11 events. Did you watch any of those speeches?

12 A No, not at all. I worked that day.

13 Q Okay.

14 And then on the 6th, you said, I think it was around noon or a little bit after that
15 you decided to check the chat.

16 A Uh-huh.

17 Q Was there something that triggered that decision? Was there a reason you
18 checked the chat at that time?

19 A No. What I'll do is I'll sit and I'll eat lunch and I'll start scanning the news
20 and just perusing things on an iPad and just see what's going on. So I figured, I'm going
21 to go see what's going on, see how it's going, see what the chat is. And it was pretty
22 much totally not what I expected.

23 Q And did you talk to anybody else separately from the chat, any other Oath
24 Keepers?

25 A No.

1 Q Okay.

2 Were there any other Oath Keepers that you became close with or that you were
3 friends with?

4 A No. No. I have never met any of them. I didn't really become close with
5 anybody or friends with anybody.

6 Q Okay.

7 If we can pull exhibit 11 back up real quick.

8 A Uh-huh.

9 Q I think there were a couple spots where you had sent a message on the 6th.
10 Can we go down to page 33 of the chat?

11 Do you remember at all sending messages --

12 A I --

13 Q -- on the 6th? Okay. We can look at these together quickly.

14 A Yeah.

15 Q Let's see. Are we on -- 33 to 34, there should be some messages from
16 DeStokes, if you can scroll to those.

17 There's the first one, I think. And I actually can't see this.

18 A I see it.

19 Q Yeah. Can you read that?

20 A Yep. I can read that.

21 Q Does that jog your memory at all of sending a message?

22 A Yeah, I do remember because I saw on the news, one of the news sites, that
23 there was a girl killed.

24 Q Okay. And it looks like this one was sent a little bit later on the 6th. This
25 message was sent at 7:28. It's, "Just read the girl that killed was only 16."

1 Did -- and then, sorry, if you scroll down a little bit more --

2 A Uh-huh.

3 Q "Do we know her name at this point? I'm not finding it yet."

4 Do you recall now sending that message, and --

5 A Yeah.

6 Q -- do you recall why you sent that?

7 A Yeah. I had read on Facebook somewhere that a girl was killed up in D.C.
8 during the riots, and I was curious who it was, what the circumstances. There was no
9 real information about it. Just somebody posted that a 16-year-old girl had been killed.

1

2 [4:01 p.m.]

3

BY [REDACTED]

4

Q Okay.

5

6

7

8

And, then, for the times that you checked this chat on January 6th, other than everybody entering that door, that video that you remembered, and then also the event of somebody being shot inside the Capitol on that day, anything else that stands out in your mind of things that were discussed in the chat?

9

A Not that I remember, no.

10

Q Okay.

11

12

I understand that you said at some point you deleted all these Signal chats. Is that right?

13

A Yes.

14

Q Okay. And can you just tell me why you did that?

15

16

17

18

19

20

A When I had sent an email to Gator 1 saying, "Take me off all your rosters, all your email lists, everything; I don't want any more to do with your organization," he ended up responding, saying, "We didn't do anything. We only helped people. I understand." And I didn't want to get any more back from them. I deleted the ProtonMail. I deleted this. I totally wiped my hands of it. I didn't want any contacts from them.

21

22

23

I just called it completely done. I wanted nothing more to do with the organization. They weren't what they represented themselves to be, and I didn't want to be hearing from anybody via -- at that point.

24

25

Q Okay. And do you know -- just more of a technical question about whether or not these were preserved. When you say you deleted Signal, do you mean that you

1 deleted, like, an app, or the application?

2 A Yeah, I deleted all of it.

3 Q Okay.

4 A I closed out of the chatrooms, and I just deleted the app.

5 Q Okay. Have you ever tried to log back in to Signal since then?

6 A No. I wouldn't go back in to see what they're doing, no.

7 Q Okay. Do you know -- did you try, as you were, kind of, trying to find the
8 Signal chats, did you try to log back in to see if you still have access to those?

9 A I did, and I couldn't get back in.

10 Q Okay.

11 A I tried to get into ProtonMail, too, and I couldn't get back in.

12 Q Okay. And did it say why you couldn't get back in?

13 A Account doesn't exist.

14 Q Sorry. Say that one more time?

15 A The account doesn't exist.

16 Q Okay. And had you deleted your account?

17 A Yes.

18 Q I'd actually like to look at that email that you just referenced, your
19 resignation email. That's exhibit 9, if we can pull that up.

20 A I can see it.

21 Q Okay. Great. I just wanted to ask you about a couple of different lines in
22 here.

23 One is, at some point, if you can read it, you say, "The flavor started" -- and you're
24 describing the messaging around January 6th, and you said, "The flavor started changing
25 from one of community/unity to playing a role in something...personal protection for

1 politicians."

2 A Right.

3 Q I just wanted to understand there, is that two different things? So there
4 was playing a role in something and personal protection?

5 A No. That's a clarification of the previous.

6 Q Okay.

7 A I often use dots instead of parentheses. As far as, it was supposed to be a
8 flag wave, and now we're actually doing something and we're protecting politicians, and
9 that's not the whole theme of what I thought Oath Keepers was about.

10 Q Understood.

11 And then you mentioned also the response to this letter. Let's pull that up.

12 That's exhibit 10. And then this response is from OKGator1.

13 A Right.

14 Q And that's Kelly Meggs?

15 A Yes.

16 Q What did you make of his response to you?

17 A Like I said earlier, the guy's kind of a blowhard. It sounded like -- it
18 sounded like crap, to be honest with you. I don't know if it's true or not, but it just
19 sounded -- it just didn't sound real.

20 Q So this email was sent on January 8th, so a couple days after the events of
21 January 6th. Did you have any other conversations with any other Oath Keepers about
22 what happened on the 6th?

23 A No. I think I logged in once, and they were talking about -- and I'm not
24 even sure which day it was, but it was somewhere between seeing the video and this
25 letter. And they were talking about, are the Oath Keepers going to provide us with

1 lawyers? And Kelly Meggs is saying, no, I already talked to a lawyer, there's no problem,
2 we didn't do anything wrong.

3 Q Okay. In that conversation, nobody mentioned who potentially the lawyer
4 might be or --

5 A No.

6 Q -- who he might be talking to?

7 A Nope. It was just Gator answering that. And, again, I thought -- I thought
8 it's not true. You know what I mean? It just sounds like somebody taking answers off
9 the cuff to shut somebody up.

10 Q Do you remember who was asking about that?

11 A I don't.

12 Q Okay.

13 Were there any other encrypted services that either you used or you recall people
14 discussing? I can give you a list of a few.

15 A I just know of the ProtonMail and the Signal. The FBI agents did ask me
16 about Telegram, but I've never -- I was not on Telegram, and I didn't even know about
17 Telegram existing.

18 Q Okay.

19 And you can take this exhibit down, [REDACTED] Thanks.

20 Did you hear anybody discuss using Zello?

21 A No.

22 Q Z-e-l-l-o.

23 A Zello -- as far as I know, Zello -- and it's probably not even the same thing -- is
24 a real estate app, but --

25 Q Okay.

1 And then any discussions through social media, like, direct messaging on social
2 media?

3 A No. They pretty much left everything on Signal.

4 Q There are a couple folks that were involved in the chats, and I'm just going to
5 give you their name and their Signal username, and if you can tell me if you know who
6 they are or recall them at all.

7 Did you know PADIMasterDiver? His name is Frank Marchisella?

8 A No.

9 Q Okay. How about Michael Green --

10 A No.

11 Q -- or Whipit? Okay.

12 And then Gray Gator 1, do you recognize that?

13 A No.

14 Q Okay.

15 And, then, we're getting kind of to the end here now, so I'm going to ask you just
16 about a couple folks that we haven't talked about yet. And just let me know if you had
17 any interactions with them or if you remember anything about them.

18 We've talked about Kenneth Harrelson.

19 How about Jessica Watkins?

20 A That I think -- that name triggered a bell with me when I was talking to the
21 FBI too. I'm not positive, but I'm almost sure that's the woman from Ohio.

22 Q Okay.

23 And how about Joshua James?

24 A No.

25 Q Roberto Menudo?

1 A No.

2 Q Joseph Hackett?

3 A No.

4 Q Okay. David Marshall?

5 A Nope.

6 Q Brian Ulrich?

7 A No.

8 Q Just two more to go. Thomas Caldwell?

9 A No.

10 Q Okay. And then last one is Edward Vallejo?

11 A No.

12 Q Okay.

13 [REDACTED] Then I think [REDACTED] has some questions for you, and then I'll have
14 a couple more things to discuss, and we're getting pretty close to the end.

15 [REDACTED] Thanks for hanging in with us. One moment.

16 BY [REDACTED]

17 Q So I wanted to go back in time a little bit and ask some more of those
18 broader questions about why you attended the events on January 6th and --

19 A Which one?

20 Q Why you had planned to attend the event on January 6th --

21 A Okay.

22 Q -- and why you eventually decided not to go.

23 A Okay.

24 Q So, going back to "Stop the Steal," I know you spoke about it with [REDACTED]
25 briefly, but what were your particular thoughts on the 2020 election? Did you believe it

1 had been stolen?

2 A I didn't know what had happened. It was -- when you talk to people just in
3 general, there -- you talk to a lot of people who supported Biden, we spoke to a lot of
4 people who adamantly supported Trump. So it's hard to get a feel in personal life to
5 understand the balance of whether it's Trump/Biden or whatever.

6 So I didn't know what had happened. I know there were some anomalies that
7 were all over the news, but I didn't know if those were actually things that led to -- I don't
8 know. It seemed like a lot of small events, and it's hard to understand whether a lot of
9 small events can change something that big. So I really didn't know one way or the
10 other.

11 Q That's very fair. So would it be accurate to say that President Trump's
12 statements about election fraud did not move you significantly?

13 A No. I mean, in the political realm, whenever you listen to any of these
14 guys, it's always threats of -- accusations of fraud and misdealings and corruption and all
15 that. And that's pretty much all you hear when you watch TV, as far as any of the
16 politicians. And depending on which station you hear will depend on which politicians
17 they are calling frauds and corrupt.

18 Q Understood.

19 So, in terms of -- and I know you already covered some of this with [REDACTED] but
20 I just wanted to go back for clarity's sake. Were there other Oath Keepers in the chat
21 discussing President Trump's claims of fraud after the election?

22 A Yeah, I believe there were ones saying that the election wasn't right and that
23 he should have it and all that. Which is another reason why it lasted from November to
24 January without resolution. I think there are mixed feelings all over the place. And I
25 did hear it in the chat, I heard it on social media, I heard it on the news. It's all over the

1 place, pretty widespread.

2 Q Do you remember anything else about what the contents of those
3 conversations were in the Oath Keeper chat?

4 A Not necessarily, other than, you know, "Trump should be President" and
5 "that's not right" and, you know, things happened and it's corrupt and all of that crap.

6 Q And moving forward, towards January 6th --

7 A Yeah.

8 Q -- was it your understanding -- you've said a couple of times that it was your
9 understanding that the only reason folks were going was to provide security for some of
10 the individuals you talked about with [REDACTED]

11 A Yes.

12 Q Was there ever a conversation about "Stop the Steal" in the context of those
13 operations, or not really?

14 A No. No. It seemed like everybody was focused on doing that. And they
15 actually seemed, like, kind of excited about doing security for Roger Stone. I guess they
16 see him as some kind of celebrity or something. I'm not even sure exactly who he is,
17 other than he's somebody in the political realm involved on the Trump side.

18 Q And was there ever a conversation about what was supposed to happen on
19 that day?

20 A Starting at the hotels where they were at, circling the speaker, pushing
21 through the crowd, getting them to their -- just that kind of stuff.

22 Q Yeah, yeah. And you very helpfully laid out that outline earlier. I was
23 more asking about, what was the expectation of what was going to happen at the event
24 that day? Was there anything that the speakers were going to say that was particularly
25 exciting to people in the Oath Keepers chat? Was there anything that was particularly

1 exciting to you? What was the draw of that event?

2 A The draw was, again, the resolution of the -- I think the anticipation was that
3 they were going to find that Trump had won. But everything prior to that had already
4 said that they weren't going to find that. I mean, if you just watch every step that had
5 taken place in all the audits and that, it was pretty obvious that that wasn't the case.
6 But I think there were a lot of people who were super-hopeful that that's where it was
7 going. And I think a lot of the speakers were probably in support of it going there.

8 The only speaker I can remember other than Roger Stone was General Flynn.
9 And, I don't know, I've heard him speak online, and it wasn't really inspirational, to be
10 honest with you.

11 Q So what did you think was going to happen in terms of the election on
12 January 6th?

13 A That I didn't know. I had a feeling that it was just going to go consistent
14 with every other milestone that had happened. This is kind of like the final milestone,
15 where they're going to say, yes, the count's right, it's going to move forward.

16 And I kind of expected that's where it was going, because even when they were
17 doing previous audits, previous counts -- I think they even did some in Georgia. It was
18 like, stuff was happening all over the place, and it was always turning out that Biden had
19 won. So I had a feeling that the final milestone was not going to be drastically different
20 than the half-dozen other ones before it.

21 Q That's very interesting.

22 So, I guess, you already touched on this a little bit with [REDACTED] but I want to
23 revisit it in light of this conversation. So, given that, what was the personal draw for you
24 to go to January 6th, meaning --

25 A Oh, the rally?

1 Q Yes.

2 A I had gone to one of the Trump rallies here in Melbourne, and it was just,
3 like, huge energy. And it was like going to -- I put it akin to going to one of the Red Sox
4 games in Boston, because I went to those one time, and I'm not a baseball fan, but the
5 energy there was pretty exciting. And I figured -- when I went to the one in Melbourne,
6 it was a whole lot of exciting energy. And they said this one was going to be the biggest
7 one of any of them throughout the election, so I figured it'd be a really cool thing to see.

8 Q So is it fair to say that you saw the opportunity to go with the Oath Keepers
9 as an opportunity to experience the excitement of the event?

10 A Yeah. Yeah. It was the event itself. It was the big rally. And the
11 opportunity kind of came up: If they're going, all right, I'll go with them.

12 But then when I said I'm not going with them, it's like, I ain't going at all, because I
13 don't want to be associated with anything stupid that might happen that they might do
14 because they're not thinking normally about doing protection for people and they're
15 probably going to get in trouble.

16 Q Sure. I get that.

17 What do you think, moving forward, about President Trump's continuing claims
18 that the 2020 election was stolen?

19 A I think it's just people hanging onto the old. It's -- I think at this point, to be
20 honest with you, it's irrelevant. There's always going to be a lot of talk back and forth,
21 just like there's talk about whether he's going to run for President again.

22 Personally, I think that'd be a mistake, just because of the divided sentiments all
23 through the country. There were pretty strong sentiments of division as far as Trump
24 being President. I mean, we went through 4 years of lots of issues and lots of fights and
25 a divided Nation. And I think, no matter how good he is on the financial or business side

1 as far as running anything along those lines, that the cumulative effect, it probably
2 wouldn't be good if he was President again.

3 Q That makes sense.

4 So I guess my final question that occurred to me in all this: Do you think that
5 President Trump should pardon the people who were at the Capitol?

6 A I don't think he's in a position to do that. I think we --

7 Q If he were --

8 A -- need to figure out -- say again?

9 Q If he were reelected.

10 A No, I don't think a pardoning is what's needed. I think we kind of need to
11 get to the bottom of the reality of what happened, one way or the other. If these
12 people are totally innocent and just got caught up in the moment, like, riot mentality,
13 mob mentality or whatever, I think that's good to know. But if there was anything else
14 beyond that, that's something we also need to know too.

15 Because, regardless, good, bad, or otherwise, or whatever side of the fence we're
16 on, there's certain procedures in place for a reason, that have been in place for over
17 200 years, and they're constitutionally backed procedures that need to be followed in any
18 election. And good, bad, or otherwise on the outcome as far as our opinion is
19 concerned, the procedures need to be followed, and when they're done, the end result is
20 the end result.

21 And if there was anything beyond that that was going on, we need to know that.
22 Or if it was just -- you know, if it was just everything -- somebody started up -- you know,
23 you get a large group of people together and there's always going to be troublemakers.
24 There's potential that maybe that got something going and it triggered a mob mentality.
25 Maybe more. No clue.

1 But I think we do need to know, just in case it's one way or the other. Either we
2 can put it to rest or we can prevent any kind of weird stuff from interfering with a
3 constitutionally approved procedure that's been going on for 200 years.

4 ██████████ Well, that's certainly something that I can get behind. And I
5 appreciate you explaining all that so well and for being so open with us during the
6 deposition today.

7 So that's all I have, and I'll hand it back to ██████████ but thank you again.

8 The Witness. Okay. Thank you.

9 ██████████ Hi, Mr. Dockery. Actually, if we could go off the record just for one
10 second. I wanted to talk to Mr. O'Brien about something quickly. So we can go off the
11 record.

12 [Discussion off the record.]

13 ██████████ Great. Then let's go back on the record.

14 And, Mr. Dockery, I just wanted to kind of finish today. I know that you have
15 spoken with FBI and DOJ in a couple different contexts. Is that right?

16 The Witness. Yes.

17 ██████████ Okay. And just in remembering everything that you've discussed
18 with them, is there anything that you covered in those conversations that we haven't
19 talked about here today?

20 The Witness. I don't believe there is. As Mark was saying, you guys are really
21 thorough, and, actually, it lasted longer than my conversation with the FBI. So you've
22 covered huge ground, and I think it lasted longer because there was more emphasis on
23 some of the political opinion realms, which I want to say right out: Opinion only on a lot
24 of that stuff. But I think that's probably why it lasted longer.

25 But, yeah, the interview went longer -- or the deposition went longer. You were

1 extremely thorough. And, at this point, I don't know, I'll sleep well tonight, but I don't
2 think I'll -- you didn't cover anything they didn't cover.

3 [REDACTED] Okay. Great. Thanks. Well, that's good to hear.

4 And I will just thank you for your time. I understand being here for a deposition
5 is not necessarily your first choice for how you spend the day, but we very much
6 appreciate your participation in this process and you answering all those questions for us.

7 The Witness. Thank you. Thank you.

8 [REDACTED] And, with that, I think we are done and we can go off the record.

9 [Whereupon, at 4:22 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