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

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11 DEPOSITION OF: MICHAEL LEE WELLS

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Thursday, April 14, 2022

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Washington, D.C.

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The deposition in the above matter was held via Webex, commencing at 10:06

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a.m.

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2 Appearances:

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5 For the SELECT COMMITTEE TO INVESTIGATE

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

7

8 [REDACTED], PROFESSIONAL STAFF MEMBER

9 [REDACTED] INVESTIGATIVE COUNSEL

10 [REDACTED], CHIEF CLERK

11 [REDACTED] SENIOR COUNSEL & SENIOR ADVISOR

12 [REDACTED], INVESTIGATIVE COUNSEL

13 [REDACTED] INVESTIGATIVE COUNSEL

14 [REDACTED] PROFESSIONAL STAFF MEMBER

15 [REDACTED], PARLIAMENTARIAN

1

2 [REDACTED] We'll go on the record at 10:06 a.m.

3 Good morning.

4 This is a deposition of Michael Lee Wells conducted by the House Select  
5 Committee to Investigate the January 6th Attack on the United States Capitol pursuant to  
6 House Resolution 503.

7 Mr. Wells, can you please state your full name and spell your last name for the  
8 record.

9 The Witness. Michael Lee Wells, W-e-l-l-s.

10 [REDACTED]. Thank you.

11 At this time, Mr. Wells, can you please raise your right hand to be sworn by the  
12 official reporter.

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

16 The Witness. I do.

17 [REDACTED]. Thank you, Mr. Wells.

18 Mr. Wells, this will be a staff-led deposition. Members of the committee, of  
19 course, may choose to ask questions. There are currently no members present.

20 My name is [REDACTED]. I'm an investigative counsel with the select  
21 committee. In the room with me today are [REDACTED], investigative counsel; [REDACTED]  
22 [REDACTED], investigative counsel; [REDACTED], professional staff member; [REDACTED]  
23 parliamentarian; and our chief clerk, [REDACTED].

24 As I said, there are currently no members of the select committee in attendance,  
25 and I'll announce any additional participants if they join.

1           The Witness.   Okay.

2           ██████████   I would like to note for the record that -- oh, I'm sorry.   I forgot  
3 to mention ██████████, senior counsel and senior advisor.

4           I would like to note for the record that what has previously been marked exhibit 1  
5 is the subpoena for Mr. Michael Lee Wells, which is dated March 23, 2022.   You're here  
6 for this deposition pursuant to the subpoena.   The House deposition rules are included  
7 in this exhibit and were provided to you upon service of the subpoena.

8           Under the House deposition rules, you're permitted to have an attorney present.  
9 I'll note for the record that you do not have an attorney present.

10          Is that correct?

11          The Witness.   Correct.

12          ██████████   Great.

13          I also want to remind you, as we do with all witnesses, that it's unlawful to  
14 deliberately provide false information to Congress.   Providing false information to  
15 Congress could result in criminal penalties, including for perjury and/or providing false  
16 statements.

17          The Witness.   Right I understand.

18          ██████████   Under the House deposition rules, neither committee members  
19 nor staff may discuss the substance of the testimony you provide today unless the  
20 committee approves release.   You will have an opportunity to review the transcript.

21          No other recordings of this proceeding are permitted.

22          Mr. Wells, can you please confirm that you're not making an audio or video  
23 recording of this proceeding?

24          The Witness.   I can confirm, yes.

25          ██████████   Thank you.

1           So before we begin I would just like to describe a couple of ground rules. So  
2 there's an official congressional reporter who's transcribing the record of this deposition.  
3 The reporter is joining us by Webex.

4           Please wait until each question is completed before you begin your response, and  
5 we will try to wait until your response is complete before we ask the next question. And  
6 that's just because the reporters can't transcribe two people talking at the same time.

7           The reporter also can't record nonverbal responses, such as shaking your head, so  
8 it's important that you answer each question with an audible verbal response.

9           And then for the benefit of the reporter and for the record, there may be times  
10 where I spell a name or a word that we're using or I ask you to do the same.

11          We ask that you provide complete answers based on your best recollection. If  
12 the question is not clear, I'm happy to provide clarification, and if you don't know the  
13 answer, please just simply say so.

14          Logistically, please let me know if you need any breaks. I'm going to try to take a  
15 break every hour or so.

16          And throughout the deposition we're going to be directing your attention to  
17 exhibits which will be displayed up on the screen. These were provided to you in the  
18 Box accounts, and when we refer you to a document, you're absolutely permitted to take  
19 time to familiarize yourself with it before we discuss it.

20          So on that point, can we please pull up exhibit 1?

21          Mr. Wells, can you see the exhibit?

22          The Witness. I certainly can.

23          [REDACTED] Great.

24          Mr. Wells, do you recognize this as the subpoena that the select committee issued  
25 to you?

1           The Witness. That is it, yes, sir.

2           [REDACTED] Great.

3           And do you understand that you're appearing for this deposition pursuant to the  
4 subpoena?

5           The Witness. Yes, sir, I do.

6           [REDACTED] Thank you, Mr. Wells.

7           We can take that down.

8           And just a couple of last points. I just want to remind you that under House  
9 deposition rules, you may only refuse to answer a question to preserve a privilege that's  
10 recognized by the select committee. And if you do refuse to answer a question based  
11 on one of those privileges, staff may either proceed with the deposition on different  
12 questions or seek a ruling from the chairman on the objection. If the chairman  
13 overrules your objection, you'll be required to answer the question.

14           The last point is I want to emphasize to you that this is a congressional  
15 investigation and not a criminal investigation. This is a separate effort from any  
16 potential or actual Department of Justice investigations.

17           I'll be leading the conversation today, but one of the other attorneys on the line  
18 might chime in as well.

19           Do you have any questions before we dive in?

20           The Witness. No. But I probably should let you guys be aware that the FBI did  
21 show up at my house last week asking very similar questions based on the subpoena, so --

22           [REDACTED] Okay. Great. Well, I will -- we'll get into that in a little bit.

23           The Witness. Okay.

24           [REDACTED] But I would just love to start with a couple of background  
25 questions.

## EXAMINATION

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BY [REDACTED]

Q Mr. Wells, where do you currently live and what do you do for a living?

A I currently live in Princeton, North Carolina, on the Wayne County side, and I run my own company. It has its ups and downs, but for the most part I'm independent, able to basically serve the customers and, in my opinion, that's -- it's something that's gratifying, you know, something I can say I built, I did that, so --

Q Absolutely. What kind of business is it?

A It's web development, web hosting, web design.

Q Got it.

And would you be able to give me just a brief overview of your educational history and whether you have any military background?

A I do. So graduated high school in Teachey, North Carolina, about an hour from here, called Wallace-Rose Hill. I've taken a few college classes. I never -- didn't graduate, but was also in the United States Army.

Q Got it.

And what did you do in the U.S. Army?

A I was a 74 Gulf, and that was before it was based to a 74 Bravo, which is a network; telecommunications systems operator, maintainer, administrator. It's been a lot, so --

Q Sounds like a lot of different things.

A It is. It definitely is. COMSEC basically.

Q Got it. Great. Well, thank you for your service.

So I just would like to dive in. Are you familiar with the Guardians of Liberty group?

1 A I am.

2 Q And how are you familiar with them?

3 A I started it.

4 Q Great.

5 And what's your position within the group?

6 A I'm still the leader -- or right this minute I guess you could say I'm a coleader.

7 Q Got it.

8 And when did you start the group?

9 A Oh, back in November, I believe it was.

10 Q November --

11 A -- 2021.

12 Q Okay. 2021?

13 A I think that's the correct year.

14 Q Okay. It's not 2020?

15 A I might have to check. I think it -- hold on. Yeah, you're right. You're  
16 right. Because of the new year and everything, you're right, I think it is, yeah, 2020. It  
17 was before January 6th though, yeah.

18 Q That's okay. I still think it's 2000 sometimes.

19 A Yep.

20 Q All right. So you established the group in November of 2020. And what is  
21 Guardians of Liberty?

22 A It is an organization where, for the most part, we serve the community.  
23 We've been known to go around and pick up trash on the side of the road, serve a soup  
24 kitchen, hand out water during, you know, disasters or help people in need. We've  
25 conducted a couple of food drives. For the most part, it's helping the community. But



1 we also have the component where we go out, we train, shoot firearms, have fun, you  
2 know, have some fellowship, companionship.

3 It is largely based on the Bible, so most of the people in the organization are  
4 Christian, God-fearing people, so, yeah.

5 Q Got it. That's really helpful.

6 Would you describe Guardians of Liberty as a militia?

7 A I would say it has that component to it, yes, sir.

8 Q Got it.

9 And what does that mean in the context of Guardians of Liberty?

10 A Well, if it ever became -- as described in the Second Amendment and the  
11 Declaration of Independence, if the need ever arose, whether it be foreign or domestic  
12 enemy, you know, it would activate as a militia and, you know, help out the community  
13 mostly in defense of the community.

14 Q Got it.

15 You mentioned that there was a religious component to the group. Do you mind  
16 just describing that a little bit more? Is it just that the members are religious, or is there  
17 something about the group itself?

18 A Well, the members are religious. We also believe that -- we believe in the  
19 Declaration of Independence, and that is that God gave us our inalienable rights, and we  
20 very much affirm that and codify that into our own doctrines because, you know, if our  
21 creator, God, didn't give us those rights, then who did? Right? So we definitely don't  
22 believe that the government gave it to us.

23 Q Understood.

24 Would you describe Guardians of Liberty as a Three Percenter group?

25 A We actually changed the name to Guardian -- when we -- well -- and there's

1 more history to it, but when we created the organization, we created it from a Three  
2 Percenters group, and we purposely left three percent out of the name. We didn't want  
3 to be Guardians of Liberty III or anything like that. We wanted purposefully to separate  
4 ourselves from the Three Percent name.

5 Q Got it. Why is that?

6 A Because they were getting too radical.

7 Q Understood.

8 What about the Three Percenter other groups concerned you?

9 A Well, the group we were in was Three Percent United Patriots, and we had  
10 one of their board members -- I wasn't a board member. I was just the leader from my  
11 State. And they have some 20,000 members the last I recall in the organization. But  
12 one of the board members there was going around telling the State leaders that we  
13 needed to prepare to start taking out civilians, and that was a big no-go for myself and  
14 several other members. There was also other falling outs and everything. We had  
15 disagreements. But that pretty much caused the rift that kind of turned the group kind  
16 of against each other.

17 And so there was other things that happened, but ultimately we left. We're  
18 happy with it and created a new group, you know, hopefully trying to create a doctrine in  
19 which would limit our ability -- prevent us from becoming the same tyrants that we  
20 feared, so, yeah.

21 Q Got it.

22 Do you remember when that happened?

23 A That was back -- that was -- the message that he put out was back in August,  
24 I think it was.

25 Q August 2020?

1 A Yes, sir. It was June to August, yeah, June, July, August.

2 Q Got it.

3 And do you remember the name of that person?

4 A Lindsey something.

5 Q Okay. Do you happen to still have that message?

6 A I do. I can deliver that if you want.

7 Q That would be great. Thank you.

8 So that was the Three Percent United Patriots North Carolina group?

9 A Correct.

10 Q Got it.

11 And what was your previous role in that group?

12 A I was the State commander for the organization, for North Carolina.

13 Q And it was around August 2020 that you left that group?

14 A Be November -- yeah, it was around August -- or September 2020, and we  
15 created Guardians of Liberty on or about November. Everything is kind of spaced about  
16 a month apart.

17 Q Got it.

18 And did that group continue to exist?

19 A Yes, sir, it did.

20 Q And it currently exists?

21 A Yes, sir.

22 Q Are the same people you knew from the group back then still involved?

23 A Some of them, yes, sir.

24 Q Including this Lindsey person?

25 A Yes, sir.

1 Q Got it.

2 Well, just going back to Guardians of Liberty, can you tell me a little bit more  
3 about, you know, why you founded it and what you were hoping to accomplish?

4 A Well, it was founded as a way to create an organization which would  
5 basically, more or less, serve the community and not a national board or something like  
6 that.

7 I also wanted to get it to where States would have more autonomy. So the way  
8 it was set up, you know, you had to get permission from the board to do every little thing.  
9 For instance, one of the things that we had to get permission from was we had one of the  
10 sheriff's departments here in North Carolina, in Roxboro, North Carolina, actually, who  
11 called in for our help and the -- sorry. That was my dog.

12 I think it was the new Black Panthers Party. It threatened to burn down the  
13 town. So he called us in to kind of, you know, have us, I guess, as a backup there.

14 But in that situation we had to contact national and get them involved, and that  
15 was something that, you know, kind of bothered me a little bit. It was, like, you know, in  
16 a situation like that when law enforcement has asked you to come in and help, you don't  
17 say no to that. You don't say, And let me put you on hold and ask somebody up above  
18 my head.

19 So we wanted the States to have more autonomy for one. We wanted them also  
20 to be more limited as far as what they could do and when they could do it. So we  
21 wanted that limitation placed as well.

22 And that limitation is based on -- basically it's One Golden Rule really, and that  
23 that is, have we exhausted every peaceful option, if every peaceful option is exhausted, in  
24 other words, you can't peacefully assemble, you can't peacefully protest, you can't  
25 peacefully continue to readdress grievances, then, you know, you're looking at, you know,

1 Article V, Convention of States. You know, once all of that is exhausted, then, sure,  
2 that's the moment that we start talking about it.

3 But the way we see it, we're a ways from that. I don't know. Days, months,  
4 years, I don't know when, but we're definitely away from that, and I hope it doesn't come  
5 to that. But it is definitely something that we, you know, I guess you could say we look  
6 forward -- I mean, we don't look forward to it, but we're looking down the road and kind  
7 of seeing that it is a possibility there.

8 But that's the main reason it was created was to basically keep a certain element  
9 of preparedness there for both natural and manmade disasters.

10 Q Understood. That's really helpful.

11 Roughly, do you have a sense of how many members you have?

12 A Active or inactive? Well, active members, we probably -- I mean, I was  
13 asked this the other today, and I kind of went through and counted. We probably have  
14 about, I would say probably 17, 18 active people now. I mean, we did have -- I don't  
15 know -- a hundred or so. We do still have a lot of inactive ones. They are -- I guess you  
16 could say if something happened, we could probably call them up. They might be able  
17 to help. But, I mean, for the most part, I would say we can only depend on maybe 15  
18 right now.

19 Q Got it.

20 And you said that there were a hundred inactive people, or was that the peak of  
21 the number of active people?

22 A There's a lot more. I would say if we needed some help, we could probably  
23 call and maybe rattle some cages, maybe a hundred people and raise them. There's  
24 probably a lot more than that. We keep membership counts both on the website, on  
25 paper. And what I mean by counts is we don't even record names. We just kind of

1 keep a number, a phone number sitting there and that sort of thing and, of course, their  
2 handle.

3 But, I mean, just -- I mean, that paper, the website, and not going through a  
4 crossing off everybody on the website we have a number for, you know, I mean, if you  
5 want grand total, I would say it's about 400 people, but it's -- and like I said, you start  
6 looking at the website, cross-referencing names, it's kind of -- you know, you can kind of  
7 check things off the list. So I would guess, hazard a guess, 300, 350 inactive, so --

8 Q So just to make sure I have this right, so you think roughly 15 active  
9 members?

10 A Right.

11 Q Maybe a hundred people you could depend on to call up if you wanted to do  
12 something and then 300 to 350 inactive people?

13 A Right.

14 Q Got it.

15 A If we had a hurricane around here, I'm pretty sure we could probably raise  
16 about a hundred people to go get water, something like that, bring it in, clothes, that sort  
17 of thing.

18 Q Understood.

19 And the 15 -- roughly 15 active members, are they all in North Carolina?

20 A Yes, sir.

21 Q Got it.

22 And what about the overall number, is that mostly in North Carolina?

23 A We have probably, I think, about, at most, 60 members abroad, but we're  
24 not -- it's not essential organization, meaning that those States have their own autonomy,  
25 but like I said that's the purpose of it being set up. They -- you know, they have the

1 supreme authority. I don't even keep membership records unless it's on the website of  
2 those States, so that's the State -- whoever starts the charter there, that's their State's  
3 responsibility to keep up that sort of thing.

4 Q Got it.

5 And is there like a formal membership process or --

6 A The membership process consists of two key components. One is going to  
7 be a background check, which we usually try to run on people when we have somebody  
8 who has access to the database. We have some bail bondsmen and stuff that's been  
9 members with us before, they have access to that. So, you know, they can go in there  
10 and kind of run somebody's background and make sure they're clean.

11 The other process is swearing an oath on the Bible, and that is pretty much the  
12 same oath we took going into the military; that is, upholding and defending the  
13 Constitution against all enemies, foreign and domestic.

1

2

BY [REDACTED]

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Q Got it.

4

And are there dues to be a member?

5

A No, sir.

6

Q Are there kind of regular meetings?

7

A Right this minute, no, sir. There used to be, but there's not anymore, not right now. It's kind of all impromptu.

9

Q Sure. Do you have a sense of when that was that you had regular meetings?

10

11

A Um, I would say back November through about December was pretty regular, right up until Christmas, and that's when it kind of -- you have to understand the other organization and our organization was still kind of feuding back and forth because they saw us as stealing their members from them, that sort of thing. And basically it was people that didn't want to have to deal with that mess anymore, so they were coming over.

17

I mean, pretty much it was kind of -- I guess you could say by -- when December came around, to be honest with you, I just had had enough of it. I had had enough of it.

19

So, I mean, we didn't have any more kind of FTXs, that sort of thing. We tried to put some things on the schedule. Not many people were -- you know, like I said, that stuff, that drama mess just zaps the energy out of people, you know.

22

And that was kind of the feeling I was getting, so I kind of, I guess you could say, I started to give up about that point. So we were not doing any regular meetings after about December. We didn't have really any kind of formal get-togethers at all at that point, so --

25



1 Q Got it. And just to clarify, this is December 2020?

2 A Correct.

3 Q Got it.

4 And then, you know, how would you all stay in touch? I saw that there was a  
5 forum on the Guardians of Liberty website?

6 A Right. We had the forums, we had Elements, and that's basically a part of  
7 the Matrix network -- or for the SNAP's network, which uses Matrix. We had -- we were  
8 using Zello as well at the time and Facebook.

9 Q Got it.

10 And you said you were using. You're not currently using?

11 A What? Facebook or --

12 Q Facebook or Zello.

13 A Right. We don't use Zello anymore, don't use Facebook anymore. Zello,  
14 they delete conversation -- or audio after, I think, after a month or so, so that was kind  
15 of -- that and we didn't like the idea that we heard that they were making it where people  
16 could just arbitrarily access your voice, information inside their channel, and, you know,  
17 all you had to do was give a link to somebody and they could go right in and listen to it.

18 So we started using Matrix after that. We were using Facebook. And after  
19 January 6th, we kind of got deleted from that; but then we started using Matrix and just  
20 the website after that, so -- element.

21 Q Got it. So your Facebook got deleted after January 6th.

22 And then when did you stop using Zello?

23 A I would say about end of January maybe. It's been awhile. I don't know  
24 the exact date, but it was around that timeframe, a little -- I think after January 6th.

25 Q Got it.

1           And then did you guys ever use Telegram or Signal?

2           A    If we did, it was briefly and not -- yeah, I don't remember anything significant  
3 with Telegram or Signal. I mean, I think we used -- so we were in -- the other  
4 organization, they tried to get everybody to use Telegram. And I looked it up, and I was,  
5 like, this doesn't look very reputable, and we also don't know where the data is going, and  
6 that sort of thing.

7           So I advised them to get away from that, and this was awhile back, like 2020 -- no;  
8 2019, 2018. It was a while ago. But I advised them to get away from that.

9           As far as Signal goes, I think we may have used it briefly a couple of times. I've  
10 used it briefly here and there to communicate with other patriot groups, but this was well  
11 before January 6th. I don't recall -- I could be wrong; I just don't recall it -- using  
12 Telegram anywhere around that date.

13          Q    Got it.

14          And when you were referring to the other group using Telegram, that was the  
15 Three Percent United Patriots, North Carolina?

16          A    It wasn't just them. It was 3AP, all of them. They were all using  
17 Telegram -- Signal; sorry. Signal, not Telegram, Signal.

18          Q    Got it.

19          What is 3AP?

20          A    Three Percent American Patriots.

21          Q    Got it.

22          And are they another group that you were involved with?

23          A    We basically had ambassadorships back between -- along the patriot groups.  
24 Some of those we have a couple of members that would join as, like, an ambassador from  
25 that group. I guess if we had critical intel and they had members in the area who

1 needed help, you know, that sort of thing, we could band together. And that was -- in  
2 my opinion, that's the way it's supposed to be. But, yeah, that's -- I was in contact with  
3 multiple different people, leadership and stuff, from other patriot groups.

4 Q Got it.

5 Actually, since we're on that subject, do you mind just helping me understand how  
6 the different patriot groups fit together and how they talk to each other?

7 A Well, they try not to fit together. There's a -- okay. There's been a lot of  
8 drama and strife going on inside the patriot community now since 1995 -- or  
9 sorry -- 2019, or maybe even before. But whenever I was -- there's just a lot of drama.  
10 People -- there's too many -- I guess you could say too many leaders, too many chiefs and  
11 not enough Indians, you know. And no offense or anything to anybody, but that's the  
12 phrase.

13 Everybody wants to be a leader and everybody thinks they can lead better than  
14 everybody else. So it seems to be almost a constant struggle for leadership in those  
15 organizations. And, of course, that was one of the things I ran into a couple of times,  
16 and I never -- I didn't want to be a leader to begin with, and I told them a couple of times  
17 that, you know, step me back down, this and that, you know, get me down to here. I  
18 don't want to be there, but yet I was constantly put up in those positions.

19 We started Guardians of Liberty -- the whole reason why we, I guess you say kind  
20 of cordoned everything off in different States like that so one person could not become  
21 too powerful, and that's, I guess you could say, a big concern of mine. But as far as  
22 communicating with the other groups, we would usually use Signal or we started to use  
23 Zello at that point. In other words, we would just have them join the public channel on  
24 Zello, and you could just pretty much get up with them on voice right there, press a  
25 button, boom, you've got them.

1           Once we found out Zello had voice opened everybody, see, that really hurt  
2 communication a lot. And, of course, I guess you could say the drama really accelerated  
3 then, but that did kind of cripple -- because everybody started relying on Zello at that  
4 point, so -- and that kind of cut comms. That's why we went over to Element which  
5 allows voice, video, texts, everything, very secured, all encrypted.

6           As a matter of fact, if you wanted the information off the server from that, it's all  
7 encrypted on the server. I can't even look at it on the server and tell you what  
8 somebody said to somebody else, you know, because, you know, it requires the keys of  
9 both parties.

10           So that was one of the best systems I had seen so far, so that's what we started  
11 using. Only thing is we stopped using it, I think it was around May, April, June,  
12 whatever, last year, and we stopped using it because it was a pain in the rear to maintain.  
13 You have to -- I mean, in order to do video and voice, you have to have a turn server going  
14 and then, of course, you have to keep the Matrix server going. There was updates.  
15 You had to update the database. And I just got to the point where there was, like, only  
16 two or three of us using it here and there. And I was, like, you know, the website chat  
17 will be fine for now, and we can just text each other or whatever on the phones because  
18 there was only two or three of us using it.

19           So I just turned it off and deleted it. And, of course, then when I moved  
20 everything to a new server, it was, like, well, that's garbage, so I didn't even move it over.  
21 But just a couple of weeks ago we did get another Matrix server up and going. Yeah,  
22 that's been our method, though. We communicate with them that way.

23           Now, as far as them fitting in together, every patriot organization seems like to me  
24 has different ideals, but the one thing that unifies them is the Constitution, I will say that.  
25 Some of them have very different views of the Constitution or what Constitution we

1 should have. I would say I disagree with a lot of those very vehemently; but for the  
2 most part, as long as we're defending innocence, you know, I'm willing to partner with  
3 pretty much anyone to that means. So --

4 Q Got it. That's really helpful.

5 So I guess if different groups have different interpretations of the Constitution,  
6 how do the groups get along? Or maybe you described how they possibly don't get  
7 along?

8 A Well, what I was talking about them not getting along is actually and oddly  
9 within the groups, right, you'll have factions start forming within days. Like, you can get  
10 a brand new patriot group going right now. Guarantee you, you can get a brand new  
11 patriot group going, and within hours you're going to have two, three, four different  
12 factions in there, and within a week those factions are going to be quarrelling who gets to  
13 lead the organization. I'm serious. That is one of the plagues that I have seen over the  
14 years inside these groups.

15 So the one thing, talking about the differences and how they reconcile them, it all  
16 seems to be about the -- it's all about the Constitution. I guess you would say that the  
17 biggest part would be the defense of their communities. That is probably I would say  
18 the absolute uniting factor between the different groups.

19 And even inside the groups you have these factions start forming and everything.  
20 You know, let a hurricane hit the area when it happens. I've seen it happen when we  
21 had Matthew and everything roll by. You know, the group we were in, they were all  
22 quarrelling and feuding and everything else. But let me tell you, Matthew came  
23 through, they were all brothers at that point. Everybody was brothers and sisters.  
24 Everybody was pulling together. It's just like they get bored. When it's something light  
25 going on, then they just have to fight with each other, you know. That's my view of it

1 anyway, my opinion.

2 Q Yeah. No, that's really helpful. It also sounds very complicated.

3 Do you remember what some of the kind of Zello groups were? And are  
4 these -- you know, when there are groups on Zello, was it kind of a 1:1, one group would  
5 be talking to another group, or was it just kind of a marketplace where everyone would  
6 join on the same channel?

7 A They would. There were a couple of them -- so we had -- oh, man, there  
8 were so many different groups. The First Responder group was one, I believe.  
9 There was so many of them. I can tell you one of them because I thought it was funny.  
10 It's also a military term. It was right after January 6th that Zello started doing, like,  
11 Facebook and deleting all of the patriot channels, you know. And they got rid of ours.  
12 They got rid of a lot of others.

13 And when that happened, a couple of people went and started creating channels,  
14 inviting everybody to it, and it was like underwater basket weaving or So and So's  
15 Lemonade Stand, something like that. It was a bunch of junk names, but that's what it  
16 was. I mean, I remember that very clearly. The rest of the names I can't recall, but I  
17 can recall those only because they were so outlandish, I guess you could say.

18 Q Got it.

19 And are those still active or did those get banned as well?

20 A No, those are no longer active.

21 Q Got it.

22 A If they are, they kicked me out of them, so I don't know.

23 Q Do the channels Real Patriots, does that ring a bell?

24 A Yeah, that does ring a bell.

25 Q Got it.

1           And were you or Guardians of Liberty members active in that channel or other  
2 channels with that name?

3           A    I can't recall exactly. I can't recall if -- it sounds familiar. There were so  
4 many of them, I'll be honest with you, so many of them. Is that -- was the leader of  
5 that -- I don't know if you have any more information on that, but was the leader of the  
6 channel AJ?

7           Q    I don't have that information in front of me. I'm sorry.

8           A    If it was AJ, I was probably a member of it, to be honest. The other ones, I  
9 don't know. But Real Patriots, I remember, I think AJ was the leader.

10          Q    Who is AJ?

11          A    AJ Abrams, I believe it is, but I would have to look. AJ Adams maybe. He  
12 is from -- I can't remember the State. I want to say he's from Texas, but, yeah, he's  
13 pretty active in the patriot community. He started a Zello group to kind of unite -- and I  
14 think that's what that Real Patriot channel is what you're talking about. It was a channel  
15 to unite other patriot groups together so different leaders can come in and talk to each  
16 other.

17          Q    Got it.

18          So AJ Abrams or Adams, you're not sure?

19          A    I'm not sure. I remember the first name was AJ. He was the leader of  
20 that channel. I talked to him a couple of times before that and everything. He seemed  
21 like a pretty level-headed guy, so --

22          Q    Understood. Are there -- going back to Guardians of Liberty, are there  
23 other leaders of the group, or is it just you?

24          A    For now it's just me. The other leader is kind of inactive right now, the one  
25 that cofounded it with me. He also moved out of the State. So it's been just kind of

1 me running things, trying to keep it together.

2 Q Got it.

3 When did he go inactive?

4 A Oh, boy. It was before January 6th. I remember that. I think it was  
5 around about that December area. We still talked after that here and there, but, you  
6 know, he's -- moving out of the State and everything kind of, I guess, took wind out of his  
7 sails, but then he turned around I think back in, I want to say, February and created the  
8 chapter for Wisconsin, I believe it was, so --

9 Q The Guardians of Liberty chapter?

10 A Right, yes, sir.

11 Q Got it.

12 And do you remember his name?

13 A Yes, sir. Michael White.

14 Q Michael White, okay. Thank you.

15 So just going back to Guardians of Liberty generally, you mentioned that you guys  
16 would do kind of training, disaster training, and some firearms training and practice,  
17 social events. Is there anything else that the group would do?

18 A You mean as far as training and everything goes?

19 Q Yeah.

20 A I mean, sometimes we would go out and just -- and training, to be clear, was  
21 like going to the range or something and firing at paper targets or whatever. But, I  
22 mean, as far as other activities, like I said, just helping around the community. That was  
23 pretty much it.

24 Q Sure. Understood.

25 And you mentioned that the Roxboro county sheriff asked -- was it Guardians of



1 Liberty or was it the previous group?

2 A That was 3-UP, Three Percent United Patriots.

3 Q Got it.

4 And that was kind of typical that law enforcement would ask for backup?

5 A No, sir. I mean, it was -- okay. It wasn't typical because I think  
6 leadership -- leaders before me, and not to knock those leaders, but they had a pretty big  
7 base in the group that wanted to stay under the radar. They wanted to operate in the  
8 shadows. And my whole thing was that the patriot movement should come out of the  
9 shadows. They should be a hundred percent above board. They should be legitimate.  
10 There's no need to hide your face, that sort of thing. You know, that was my  
11 view, and we started doing that. We started helping out in the community. That's  
12 something that I got them involved with, and I guess you say that some of the leaders,  
13 county leaders and such, started paying attention.

14 And when that happened to Roxboro, I guess we were one of the people that that  
15 sheriff called up. We also -- the executive officer at the time also with the church, I  
16 think it was, or one of the county commissioners or the sheriff -- I can't remember which  
17 one it was, but he was talking to him a lot about what the organization was, what we  
18 stood for, what I had stood for, was trying to get, you know, the organization converted  
19 into, and it became a very -- we started to garner a pretty good, decent reputation.

20 Q Got it.

21 And does the 3-UP group still do stuff like that since you left?

22 A No, sir.

23 Q Okay. To your knowledge -- I know you're not a member of that group  
24 anymore, but what does the 3-UP group do now?

25 A To my knowledge, they don't even have field training exercises or anything

1 anymore. They don't go out and shoot. If anything, it's kind of like a localized ordeal.  
2 What I was told, there was a couple of members that were upset at one point because -- I  
3 can't remember whatever last hurricane, I think it was, they had no response to it at all.  
4 And I know a couple of people that came to our organization from that said they weren't  
5 happy with that, so --

6 Q Was that group a chapter of a larger national group?

7 A Yes, sir.

8 Q And was that just Three Percent United Patriots?

9 A Right. That was Three Percent United Patriots. We were Three Percent  
10 United Patriots, North Carolina.

11 Q Got it.

12 A And I was the CO or leader of the North Carolina part.

13 Q Do you know who the current State commanding officer is?

14 A Yes, sir, I do. Mike Morris.

15 Q Mike Morris?

16 A Yes, sir.

17 Q Got it.

18 And, by the way, was the AJ person AJ Andrews?

19 A Could be, yeah. Andrews, that's it, yes.

20 Q Okay. Great. Thank you.

21 So the 3-UP national organization, was that in all 50 States? Were there  
22 chapters that were --

23 A They were in all 50 States. I think they even talked about opening up a  
24 Canadian one, yeah.

25 Q Yeah.

1           A    I don't think they ever did, but they were talking about it at one time.

2           Q    You know, what's your sense of what the Three Percenter name means and  
3           that kind of idea of the three percent?

4           A    Well, three percent, the way I see it, is it goes back to the American  
5           Revolution, the founding of the United States.   It's supposed to stand for the supposedly  
6           rumored three percent of the town in Concord that stood against the British when they  
7           tried to confiscate the firearms, which is the shots that pretty much set off the American  
8           Revolution.

9           Q    Uh-huh.

10          A    But it's not really just that that's important.   The important part is that, you  
11          know, it only takes three percent of a population -- you know, that's the rumor of that.  
12          It takes three percent of a population to start a revolution that results in liberty.

13                So, like, in that situation, if it wasn't for -- you know, the theory goes if it wasn't  
14          for that three percent in the town of Concord stood up against the British, you know, we  
15          might be speaking -- having afternoon tea and everything right now, you know.

16                Roxboro wouldn't created our dictionary, that sort of thing, you know.   Yeah.  
17          That's -- I mean, that's the way I see it.   It all goes back to those few people that had the  
18          fortitude to stand up and say, No, this has gone one step too far.   You're not having our  
19          guns.   And as I know, of course, they died from it, but, you know, they made that  
20          sacrifice, that three percent.

21          Q    Understood.

22                Is it fair to say that, you know, members of Three Percenter groups share that idea  
23          that they're part of a three percent that could --

24          A    It's not fair to say that because a lot of them don't even know what it means.  
25          Honestly, they have no -- they don't know anything about the founding of this country.

1 I've noticed that a lot. I've tried to educate people. I've tried to show them the history  
2 books on it. They -- I mean, a lot of people are shocked. Well, I didn't know that's  
3 what three percent means. How did you not know? You joined the organization, you  
4 know.

5 But that's one thing we try to educate people to on our website. There's a lot of  
6 other websites, even the National Association of Three Percent United Patriots, that  
7 really touch on that. It's just like touching on the Constitution and certain rights being  
8 inalienable. I get that. You know, I do. But nothing really explained the history of  
9 where Three Percenters came from.

10 That's something that I try to do on the Guardians of Liberty website, try to  
11 squeeze that in there and say, Look, this is what three percent means. It's not a hate  
12 group or anything like that. It's a -- you know, it is a group that is, you know, willing to  
13 defend liberty. Really, that's what it boils down to, but --

14 Q So what do you think is the draw for people who don't know what the  
15 "Three Percenter" term or idea means?

16 A You want me to be honest with that one?

17 Q Sure. I'm genuinely curious.

18 A They are wanting to go with another group that, you know, shoots  
19 military-looking, mean-looking weapons. I mean, honestly, that's it. They want to be  
20 around that. They want to shoot. They want advice on it. That's largely what I have  
21 seen.

22 There is some members in there that really know their stuff, don't get me wrong,  
23 but I would say they're in the minority. The majority, no, absolutely not. Those people  
24 are there because of, you know, the flashy guns and everything. And they  
25 quickly -- those people also quickly realize too it's not -- they're not toys. You know, we

1 had a couple of members who thought they were toys, and we had to get rid of them,  
2 you know. They're dangerous. You know, people like that are dangerous, but, yeah.

3 Q Yeah. So is there any kind of vetting that Guardians of Liberty does or your  
4 previous group?

5 A Well, the previous group, we -- same thing -- did background checks, and I  
6 started the whole telling people they had to swear an oath on the Bible. That carried  
7 over to Guardians of Liberty, yeah.

8 Q Got it.

9 And does it kind of cause problems within these Three Percenter groups that  
10 people are maybe not there for the right reasons?

11 A Well, hey, I'm pretty sure there's a lot of reasons why the factions are made.  
12 You know, rifts and stuff start happening, opening up in those groups and start having  
13 factions and quarrelling and, you know, who's going to be the leader. You know,  
14 there's -- that knowledge definitely creates -- you know, puts a divide in the groups.

15 And, of course, you have some people that join for other reasons, like foreign  
16 nefarious reasons, and you have to -- I've noticed that you have to learn to identify that  
17 and get that out of there really quick.

18 Q Yeah. What are those nefarious reasons that you've seen?

19 A Oh, yeah, like straight up, We need to take somebody out sort of thing.  
20 Yeah, those types you've got to get rid of. I have seen those come in. I have seen  
21 them come in, you know, to try and change the views on the group. I have seen that a  
22 couple of times. Those weird -- you know, they come in, Oh, yeah, we're patriots  
23 through and through. And next thing you know they're trying to change people's  
24 viewpoints on the Second Amendment or this or that.

25 And it can be radicalization or it could be, you know, more passivism. It could go

1 either way, but they would come in and they would start pushing that really hard. And  
2 those types of people, sometimes you just had to get rid of them because they push too  
3 hard and they start creating rifts again, and, yeah, next thing you know, you've got  
4 quarrels going on again, so more drama.

5 Q Right. Well, if you get rid of them, do they go and just make their own  
6 group?

7 A Some might sometimes. Sometimes they go and join another group and  
8 try the same thing. That's one thing we found out happened a lot. I would say about  
9 80 percent of the time you got rid of somebody, they would try and go join another group  
10 because they would call me -- or they would either call or they would send me emails, or  
11 whatever. They would say, Hey, this person, do you know them? He said he came  
12 from your group.

13 Yeah, don't -- you don't -- here's the problem we had, that sort of thing. So that  
14 would happen.

15 Q Got it.

16 Are there a lot of Three Percenter groups?

17 A Yes, sir, absolutely, I mean, a lot.

18 Q Do a lot of them fall under a national umbrella like 3-UP or are these  
19 independent groups?

20 A I would say a vast majority of them do that I'm aware of. I mean, you've  
21 got, like, Oathkeepers, I would call them a Three Percenter group as well. You have, you  
22 know, the Cajun Navy, Light Foot Militia, and now you've got the North Carolina Light  
23 Foot, South Carolina Light Foot, you know. I mean, yeah, a lot of those are kind of  
24 pretty much, you know, synonymous with three percent, especially what they believe and  
25 stand for. They might -- they like Guardians of Liberty when we got rid of the three

1 percent because, you know, we knew that there were people trying to give them a bad  
2 name. We absolutely do. There was one called, let's see, Three Percent  
3 FS -- yeah -- SF. And they were way too radical, you know. They went after civilians,  
4 immigrants, that sort of thing. When we created Guardians of Liberty, we don't want  
5 that name at least directly on our name.

6 Q Right.

7 A You know, we need to separate ourselves from that because it's the last  
8 thing that we want to portray or be.

9 Q Got it. That makes sense.

10 You mentioned that the vast majority of groups fell under a particular umbrella.  
11 Aside from 3-UP, what are some of the other big groups?

12 A 3AP, Three Percent SF, the Light Foot Militia. Last I heard I think Cajun  
13 Navy also was in multiple States now. And they don't fall under the Three  
14 Percent -- they don't fall under 3-UP, but they have their own national structure, so to  
15 speak. So I would say, yeah, you could put them in that same class but not the same  
16 organization.

17 Q Yeah.

18 A You also had -- there's so many of them. Oh, Lord. AP, 3-UP, 3AP, 3SF.  
19 Was it 3CAP or something like that, Constitutional Patriots, or whatever?

20 Q Got it.

21 A You had -- there's a whole bunch of them. I would have to look back with  
22 all the acronyms again, but, yeah, there's a whole bunch of them.

23 Q No worries. You said that there are a lot of them. Right?

24 A Yes, there are.

25 Q You mentioned that the Oathkeepers, you consider them a Three Percenter

1 group?

2 A Yes, absolutely.

3 Q Were you familiar with the Oathkeepers North Carolina chapter?

4 A No, sir.

5 Q Okay. Doug Smith, does that ring a bell?

6 A As far as I'm aware of, I've not talked to him. So I don't -- he's not familiar,  
7 even the name.

8 Q Understood.

9 So your group, Guardians of Liberty, and then 3-UP didn't really have interactions  
10 with the Oathkeepers?

11 A Not much. We had one of their members, I believe, at one point -- and I  
12 don't know even know the timeframe of this, but he was in our Zello chat at one point  
13 talking to us, sharing intel back and forth. This was during the whole COVID thing. We  
14 were talking about, you know, there was one county, or whatever, in North Carolina that  
15 went into a lockdown. Like, they put up roadblocks and stuff. We're, like, hold on  
16 what? So we started sharing intel on that, like between the different organizations, and  
17 that's when they got looped in, so before that and after that, haven't talked much to  
18 them.

19 Q Got it.

20 Yeah. Actually, on that note, one thing that I think the Oathkeepers did in early  
21 2020, when kind of the COVID lockdowns were happening, they were kind of providing  
22 security at anti-lockdown protests.

23 Was 3-UP involved in those or Guardians of Liberty?

24 A No, sir.

25 Q Okay. And event security in general?



1           A    Correct.  The only time we ever provide security or activate like that is if  
2   law enforcement, the Governor, or somebody like that calls us in to do.

3           Q    Got it.

4           A    And then I wanted to ask about two other groups.  One is 1st Amendment  
5   Praetorian.

6           A    Does that ring a bell?

7           A    No.

8           Q    And the leader is Robert Patrick Lewis in case that helps jog your memory.  
9   Okay.  And then are you familiar with the Proud Boys?

10          A    I am, yes, sir.

11          Q    Did you ever work with them or interact with them?

12          A    I didn't work with them, but I knew a couple of them.  I had a couple of  
13   them friended my Facebook.  One of them was Haley Adams.  And mostly I was friends  
14   with her dad as well, but I was very much supporting their work in Oregon in trying to get  
15   the -- I mean, at the time when the rioting was starting up, you know, them trying to get  
16   it to stop and trying to provide -- bringing up security, that sort of thing, I was very much  
17   in support of that.

18          Q    Got it.

19          A    And do you see the Proud Boys as affiliated with the Three Percenter movement?

20          A    No, sir.

21          Q    Why not?

22          A    I think their ideals are more focused on ideology than the Constitution.

23          Q    Got it.

24          A    And what do you think their ideology is?

25          A    Well, I think their ideology does not look at We, the People.  They are only

1 looking at a certain subset of people, whereas I believe that if you're upholding and  
2 defending the Constitution, you have to practice what you preach and include everyone.

3 Q Uh-huh.

4 A Whether you like them or not.

5 Q Yeah. What do you mean by "a certain subset of people"?

6 A Certain color. And I make no -- I won't sugarcoat it. They pretty much  
7 only accept White people.

8 Q Yeah. That's helpful.

9 So you didn't really interact with the Proud Boys in North Carolina?

10 A Yeah, I don't know any of them in North Carolina, as far as I'm aware. If  
11 you start naming names, I might tell you all. I didn't know what they was involved with,  
12 but, yeah, I might know them, but yeah. Otherwise, no.

13 Q Yeah. And I think I know the answer to this question based off what you  
14 said, but did you ever see any kind of overlap between Proud Boys and Three Percenter  
15 groups?

16 A Not really, no, sir. That was the thing is when somebody came into the  
17 Three Percenter groups -- I guess you could say as part of the thing, we would go do meet  
18 and greet. They came up to us and started talking about, you know, only certain races  
19 and only certain race -- I'm, like, No, they got to go. I mean, even the leader before me  
20 in North Carolina would, you know, boot somebody like that, say, Absolutely not. You  
21 can't discriminate on that at least, you know, or even other specifications, you can't  
22 discriminate, you know.

23 So I don't see how a Proud Boy could fit into that kind of organization.

24 Q Yeah, that makes sense.

25 Before I jump to the next topic, I just wanted to see if any of my colleagues, [REDACTED]

1 [REDACTED] or [REDACTED], have any questions.

2 A It's almost at that hour mark, so --

3 Q Oh, yeah. Well, why don't we see if [REDACTED] or [REDACTED] have any  
4 questions, and then we'll take a short break.

5 Does that sound okay?

6 A That sounds fine.

7 Q Great.

8 [REDACTED] My questions are probably pretty quick [REDACTED] if you want me to  
9 jump in first.

10 [REDACTED] Sure. Go ahead, [REDACTED]

11 BY [REDACTED]

12 Q Mr. Wells, you mentioned communicating with AJ Andrews.

13 A Yes.

14 Q How well do you know him?

15 A I remember he was in a group. There was another female who got me into  
16 it from her own channel awhile back; but, otherwise, I mean, I've only briefly  
17 communicated with them. I've told him about different issues that we've had in the  
18 State here and there, but otherwise I don't -- I mean, I could see his picture on Zello, but  
19 otherwise that's the only thing I could really tell you about the way the man looks.

20 Q So you never met him in person?

21 A Correct, never met him in person. Like I said, the conversations that we've  
22 had have always been kind of brief because the guy seemed very busy, which I  
23 understand. So any sort of conversations we have ever had have been usually brief, like,  
24 I would say, probably -- if you would record everything that we have said the sum total of  
25 my lifetime, you would be looking at, probably, maybe 15 minutes' worth of audio, yeah.

1 Q And did he invite you into a lot of different Zello chats or --

2 A I think he did. Actually him and Rogue -- I can't remember her name, but  
3 Rogue something, they invited me into a whole bunch of different chats.

4 Q Do you have any idea of where Mr. Andrews lives?

5 A I'm sorry. Can you say that one more time? A call was trying to come in  
6 there.

7 Q I'm sorry. Do you have any sense of where Mr. Andrews live?

8 A I think I indicated I think he might be in Texas. That's mostly because of his  
9 accent. It sounds Texan, so --

10 Q Got it.

11 And if you find out who this Rogue-someone Zello user is, would you be willing to  
12 provide that information later?

13 A Sure.

14 Q Thank you very much.

15 [REDACTED]

16 BY [REDACTED]

17 Q Thank you, [REDACTED] And thanks to speaking with us, Mr. Wells.

18 I had a couple of questions to go back to an earlier point that you raised with Mr.  
19 [REDACTED] about backing up law enforcement. I wanted to ask a little bit more about the  
20 contours of your interactions with local law enforcement as the Guardians of Liberty.

21 So can I ask, were there ever any instances where you were called up to back up  
22 local law enforcement? And what did those situations look like?

23 A In Guardians of Liberty?

24 Q We could start there.

25 A No. That organization has not been called yet.

1 Q Okay.

2 A Their reputation was not as well established as only being a year in the  
3 organization. And Three Percent -- or 3-UP, when I was the commanding officer here,  
4 absolutely, yes, sir, we were called up. I think we had two times we were asked. One I  
5 was involved with; the other I was not, meaning that other people in the other counties  
6 that were -- that I put in command over those counties, they handled it completely,  
7 whereas Roxboro we called the entire State in for that.

8 Q So what were the situations that you were called in by law enforcement?

9 A One of the situations I think was after Hurricane Matthew.

10 Q Okay.

11 A I have to go back and review that.

12 The other situation was Roxboro when the -- I don't even know his name, but I  
13 know his Twitter handle, his name was Azrael on Twitter, but he was the leader of the  
14 New Black Panthers Party and started issuing threats to the town of Roxboro and said,  
15 you know, they would come in and burn down the town, that sort of stuff, because, you  
16 know, there was a cop which shot a Black guy who was -- literally pointed a shotgun at  
17 him, so, I mean, it's -- they showed -- my XO basically said he saw the video.

18 They showed him the video and -- when they were asking, you know, if we would  
19 come down and help, they showed him the video, everything that happened before it  
20 even was released. And he said it absolutely was justified because I've seen this before.  
21 He said it was absolutely justified. And I said -- he goes, So are we going to help or not?  
22 And I was, like, Yes, we're going in. So that was the situation there.

23 We did come in. We didn't have to do anything because we were -- at the time  
24 we had -- I don't know if the sheriff organized this or who did, but we were called in.  
25 Business owners came out and invited us to basically stay inside of their buildings in the

1 downtown area.

2 Q Uh-huh.

3 A And we did. So we went and saw the buildings. I didn't. I was in  
4 another location, but various members went to those buildings armed and closed, locked  
5 the doors, and waited. And, of course, we had other people just kind of outside looking  
6 and everything. And when the crowd started coming down, it looked like it was starting  
7 to get a little hairy. When they saw that the sheriff's department and our guys were  
8 down there standing pretty much waiting, they decided they were done right there.  
9 They dispersed.

1

2 [11:06 a.m.]

3

BY [REDACTED]

4

Q That's really helpful. So can you give me a sense of when this happened,

5

the latter incident?

6

A It was middle of 2020, I believe it was.

7

Q Okay. So summer of 2020 when there were a lot of the Black Lives Matter

8

protests happening starting in June?

9

A Yes, sir. I'd have to check on that, but, yeah, I'm pretty sure you're about

10

on it there.

11

Q So, in the context of your decision to break from the larger militia, you

12

mentioned it was because they were talking more openly about targeting civilians --

13

A Oh, it wasn't open.

14

Q Sorry, go ahead.

15

A It wasn't open. Yeah, they were doing it in private.

16

Q Okay.

17

A Yeah.

18

Q So was it related to that kind of situation that you just described?

19

A Correct. So we did the whole breakaway thing just after -- well, I left just

20

after that whole thing with Azrael, because there was, like I said, too many leaders there.

21

I left after that.

22

I was already talking about leaving with a couple other people, including White,

23

before that. He had already been removed from the organization by national, and we

24

already had a bunch of squabbling going on.

25

So we went down there and helped with that. And then, basically, there was a

1 big squabble about that. I was removed. And then a whole bunch of people came to  
2 me and said we should start a new group.

3 Q So the squabble was about the issue of use of force? I'm just trying to  
4 better understand.

5 A No. No, no, no. Okay. The squabble that I left under was a difference  
6 of opinion of how we conducted ourselves down at the -- like you said, there's been a  
7 huge rift inside these organizations about whether or not to remain anonymous and in  
8 the shadows or out in the open and above board, right?

9 Q Uh-huh.

10 A And those two factions still exist today.

11 Q Right.

12 A I was in the faction that we go above the radar, above board, and the like,  
13 you know, and show people that we're not to be feared or be afraid of, right, and we  
14 want to help.

15 In that, we did a livestream and had one of the other guys there basically say that  
16 was a security problem. I'm like, it wasn't a security problem. We picked out the area.  
17 It couldn't have been identified. We made sure it couldn't have been identified. I said,  
18 before the video was uploaded, the meta was scrubbed. But there's no -- there's no  
19 security issues there.

20 But he raised absolute heck until, you know, basically, at that point, I was just -- I  
21 was done. I was just done for the whole organization at that point. It was that straw  
22 that broke the camel's back.

23 But if you want the more -- the more direct reason I left was definitely because of  
24 the whole -- and it was actually mentioned when I left -- is the whole, you know,  
25 radicalization thing that came from that Mr. Lindsey guy.



1 Q Okay. And would you say that was exacerbated because of the events over  
2 the summer when you were called up and --

3 A Yes, sir. Absolutely.

4 Q Okay.

5 So I'm really curious to learn more about the mechanics of your militia being  
6 called in by law enforcement. Was this a designated line of communication from law  
7 enforcement to the militia? Was it more of an open call? Can you explain that a little  
8 bit more?

9 A Well, it was -- we had both direct and indirect lines to law enforcement.  
10 We had indirect lines and direct lines to the sheriff himself.

11 To give you an idea, we saw over the feed that the Black Panthers Party had  
12 leaked -- these telemarketers. Hold on. I'm sorry, guys. I apologize.

13 Q You're good.

14 A So we had it over -- we saw it on -- so, when we set up everything, we had an  
15 intel team going that was watching livestreams every day. And it was a pretty nice little  
16 setup we had going.

17 Basically, we saw it come over livestream where the Black Panther, Azrael, just got  
18 up there and basically announced the officers that shot the Black guy and announced his  
19 address. Like, it was leaked right there.

20 And the first thing I said, I was like -- you know, I didn't know if the sheriff's  
21 department saw it, didn't know anything. And I told him, okay, guys, get over to his  
22 house ASAP. So we sent two guys over there.

23 When they got to his house, it was on the other side of the county line, and they  
24 never knew they crossed the county line, right? So, inside of this county, pretty much  
25 the sheriff was on our side. The other county, the sheriff didn't know us.

1           But that sheriff from the other county was providing the security for that  
2 particular house or, you know, for that officer. So, when our guys got there, first thing  
3 they did is stopped them and took them into custody. Then they --

4           Q    Okay.

5           A    -- made a call to the -- they told them, they said, look, we're here on behalf  
6 of Three Percent. And when he called the sheriff on the other county, he says, yeah,  
7 release them.

8           So, I mean -- yeah.

9           Q    So how did that relationship with the sheriff in the other county, where you  
10 had a relationship with him, how did that work on the day-to-day? Was there  
11 communications about potential threats, or was it more of a call for a specific event?

12          A    It was a very specific event, right. I think the sheriff may -- I mean, if you  
13 want my honest opinion, I think he may have panicked a little bit. Honestly, that's my  
14 opinion. The calls that we got, I think that it has been a little more panic-stricken sort of  
15 things.

16          Q    But there had been a relationship between Three Percent and that sheriff  
17 beforehand.

18          A    Correct. Yes, sir.

19          Q    Was there ever any joint training between law enforcement and the Three  
20 Percent militia that you were aware of?

21          A    Joint training would be a harsh word, I would say. Do we have law  
22 enforcement in the organization? Yes, sir.

23          Q    Active duty law enforcement?

24          A    Yes, sir.

25          Q    What about, any Active Duty military?

1           A    Not in the organization. We have had Active Duty military that's joined us  
2 every now and then on FTX or going to the range or something like that, but not in any  
3 official capacity.

4           Q    Uh-huh. And what about veterans? Is there a prevalence of veterans in  
5 the organization?

6           A    There's a whole lot of veterans, yes, sir. There is a whole lot of veterans.

7           Q    Why do you think that is?

8           A    Because we all love the Constitution.

9           Q    Yeah. That's really helpful.

10          Were there any other instances where law enforcement resources were used in  
11 operations of the Three Percent?

12          A    I don't think we've ever had any law enforcement resources used.

13          Q    Okay. No, that's helpful. So, when folks were coming to be involved in  
14 trainings because they were members of the law enforcement entities, they were coming  
15 in their personal capacity?

16          A    Right, their personal stuff. Yes, sir, absolutely.

17          Q    Okay. And were those members typically used as the liaisons for these  
18 specific events? Or was there a designated person who was responsible for  
19 communicating with the sheriff or communicating with the sheriff's office?

20          A    Like, okay, in the instance of Roxboro, it was the XO at the time; he was in  
21 direct contact with the sheriff in -- like I said, it was either the sheriff or one of the board  
22 members of the county was a regular attendee at his church, so that's how they knew  
23 each other. So I would say they were almost always in direct contact, at least every  
24 Sunday. Yeah.

25          Q    And just one clarifying question. FTX, does that mean field training

1 exercise?

2 A Correct, sir. That's correct.

3 Q Okay.

4 And what was the name of the sheriff in the county that you had a relationship  
5 with?

6 A I would have to check. I can't recall offhand.

7 Q Okay. That's all right.

8 A I think it was Greene County, though, but I can check.

9 Q Greene County?

10 A Yeah, I think.

11 Q Okay.

12 A Just, if you Google and make sure I'm not telling you -- like I said, it's been a  
13 while.

14 Q Yeah, I know.

15 A I'm bad with names. All right. If you look it up, it's whoever the sheriff  
16 was back then in Roxboro, whatever county that is.

17 Q Okay. Well, we can definitely look that up.

18 And you also mentioned to [REDACTED] instances where you might anticipate  
19 being called up by the Governor. Just to be clear, that never happened, right?

20 A Correct. Right.

21 Q And would you envision that happening in a similar way, where you're called  
22 up for a specific event to assist?

23 A Correct. And we would like to be prepared for that. I mean, that's  
24 specifically any -- at least in North Carolina, right, the law actually defines, you know, the  
25 militias can be called by the Governor. That's what they're here for, is to be called by

1 the Governor.

2 Q Right. No, understood.

3 And I think someone just looked it up. Is the sheriff by any chance Dewey Jones?

4 Does that ring a bell?

5 A No, I don't -- I don't know if that was the -- it may have been.

6 Q Okay.

7 A Yeah, it may have been.

8 Q All right. Well, thank you.

9 And another question that occurred to me: Some of the more radical turns by  
10 the Three Percent members that caused you to split off, were those beliefs ever  
11 communicated to the sheriff's department that you know of, about --

12 A Oh, I gave them a screen- -- I gave the F- -- I dropped the FBI off a screenshot  
13 of my Facebook page whenever that was done. I sent it right into -- yeah, I sent it right  
14 in their tips line. Or, they had a tips email.

15 Q And that involved the Three Percenters talking about wanting to target  
16 civilians?

17 A Correct. Yes, sir. More specifically, they wanted to target a specific  
18 political ideology.

19 Q And what ideology was that?

20 A Democratic.

21 Q And why did they say they wanted to target Democratic civilians?

22 A They believed that it would be the only way to stop the rioting.

23 Q And this was the rioting that was seen as part of the Black Lives Matter  
24 protests?

25 A Correct, sir. And the antifa stuff. I think it was antifa was involved by

1 then as well. It was antifa, Black Lives Matter.

2 Q And was it your belief that those members of the Three Percent saw antifa  
3 and Black Lives Matter as pretty intertwined?

4 A Well, yeah, they saw -- well, they saw them as two arms of the same body.  
5 Yeah.

6 Q And how do you think the Democratic Party, both voters and politicians,  
7 were seen in relationship to those two arms?

8 A I mean, I would hope, like, the politicians and leaders of the Democratic  
9 Party wouldn't condone it. But --

10 Q Sure.

11 A -- I'll be honest with you, in some of their defenses -- I mean, I don't condone  
12 them by any means being violent. But, in their defense, one argument they were able  
13 to uphold -- I believe it was one -- I can't remember which one it was; I have to go look it  
14 up -- one of the senators -- I don't know if it was -- may have been Wheeler himself, Ted  
15 Wheeler in Oregon -- came out and basically pledged support and everything to Black  
16 Lives Matter. And, of course, the antifa protesters play support.

17 And, of course, then, you know, they came out -- of course, the media started  
18 reporting that it wasn't rioting; it was mostly peaceful protests. Right?

19 So this naturally did anger a lot of people, to the point where, I mean, I could see  
20 people going over to topple that. You know, if you don't have good leadership, cool,  
21 calm, collected, can calm people down, I could see them going over the top, you know?  
22 Because that is kind of -- I guess you'd say it kind of makes people look around and go,  
23 "Toto, we're not in Kansas anymore."

24 Q Uh-huh.

25 So was it fairly common for you to hear conversations internally about targeting

1 Democratic civilians in the weeks before you left the Three Percent?

2 A It was -- yeah. It was getting that way, but it was -- okay. It was  
3 common -- when it first started, it was a shock to me.

4 Q Yeah.

5 A From what I was told, it was common of this guy particularly, and it was  
6 becoming more and more accepted by leadership.

7 So that's why, at that point, it was like, you know, we have to start making an exit  
8 strategy at this point, or have an exit plan. And we did; we started that exit plan. So --

9 Q And when do you think this conversation about targeting Democratic  
10 civilians started?

11 A I don't know the exact date. I do have a screenshot somewhere that I had  
12 it on another website. It was up here. It was just a few messages, but it came right  
13 out and said, you know, about targeting the Democrats, all the Democrats. And I was  
14 like, that's wrong. You know, you see me obviously protest the message, right?

15 Q Yeah.

16 A But, yeah, that was posted -- I had that posted in public there for a while too.  
17 I sent it to the FBI, posted it public.

18 But that should be date-stamped. Otherwise, I can't give you a definitive date.  
19 But I can get you that screenshot.

20 Q Sure. That would be great to have, and really appreciate that.

21 I want to follow up -- you said you sent that last screenshot to the FBI that was  
22 pretty explicit after the Azrael incident. Did you ever hear from the FBI about it?

23 A No, sir, nothing.

24 Q And did you --

25 A I've also -- in my defense, I've also dropped off -- tried to file reports and

1 everything for DDOS attacks and everything else.

2 Q Uh-huh.

3 A Never. I mean, all sorts of stuff, and I've never heard anything back from  
4 them, so -- yeah.

5 Q And did you ever inform local law enforcement about this directly?

6 A I have informed local law enforcement about a lot of things online before,  
7 and they keep -- they all tell me one thing: If the person's not located in North Carolina,  
8 there's nothing they can do. So I didn't even try, as far as --

9 Q Oh, because these posts about targeting Democrats were not the local Three  
10 Percenters that you were --

11 A Correct. It was the national board member. Right.

12 Q Okay. Okay.

13 A Right.

14 Q Well, it would definitely be helpful to see those screenshots if they're still  
15 available.

16 And, to your knowledge, did the local law enforcement in North Carolina ever stop  
17 working with the Three Percenters or cut off communications with them after this more  
18 radical turn?

19 A I don't know for certain on that. Yeah, I could only speculate.

20 Q Okay. That's totally fine. Just wanted to follow up on that.

21 I don't think I have any other questions right now, but this is really helpful for  
22 broader context and understanding, and I'm sure we'll have more soon. But I know we  
23 want to take a break, so we can do that.

24

BY [REDACTED]

25 Q Just one quick question before we take a break. You mentioned someone



1 named Lindsey involved with 3UP.

2 A Correct.

3 Q Was that person involved with the North Carolina chapter or the --

4 A No. That's the board member that made the -- talking about Democrats.

5 Q Got it. But not local?

6 A Correct. Correct. No, definitely not local.

7 Q Got it.

8 [REDACTED] Great. Well, why don't we take a break and maybe come back  
9 at 11:30? Does that sound good?

10 The Witness. Sounds good.

11 [REDACTED] All right. Feel free to turn your video and audio off.

12 The Witness. Okay.

13 [REDACTED] And we will go off the record.

14 [Recess.]

15 [REDACTED] So we'll go back on the record at 11:30.

16 BY [REDACTED]

17 Q So I wanted to move right to January 6th --

18 A Uh-huh.

19 Q -- and just start by asking, were you present in Washington, D.C., on  
20 January 6th?

21 A Negative.

22 Q Were any members of the Guardians of Liberty militia present?

23 A To my knowledge, no. They better not have been.

24 Q So I'd like to just go through a couple of screenshots that the committee was  
25 able to obtain and ask a couple questions related to them.

1 Can we start with exhibit 16?

2 A Are you going to present that, or do you want me to --

3 Q Yeah. Yeah. We'll have a colleague present it.

4 I'm not sure which colleague is sharing their screen, but can we please pull up  
5 exhibit 16?

6 Thank you.

7 All right. So, Mr. Wells, this is a Facebook post of yours from January 5, 2021, at  
8 10:48 p.m.

9 And if we could scroll down, please. Great.

10 So, in the comments, you write, quote, "Have 8 guys in my org on ham now. Cell  
11 comms being jammed."

12 A Right.

13 Q Who were you referring to in your organization?

14 A We had two -- we had two communications guys, were being backed up by a  
15 few more guys as well. I don't know -- a couple of them's names I don't know. But  
16 ham, that's on ham radio. We were communicating via ham radio.

17 Q Got it. And these are people from Guardians of Liberty?

18 A Correct, that were actually doing the communications via ham.

19 Q And they were in Washington, D.C., at that point?

20 A No, sir. They don't have to be in -- they don't have to be anywhere near  
21 Washington, D.C., to get up with somebody on ham radio.

22 Q Okay.

23 Can we scroll down to page 2, please?

24 So later in the comments, you write, quote, "Which hotels? There are 7 that my  
25 guys are staying at. 2 have been raided, 2 are in progress and the 12 guys there had to

1 raise me on ham radios because their phones suddenly can't make calls or use data.  
2 Something is going on."

3 So I'm not sure I understand --

4 A Okay. The seven of my guys, that there's -- okay, that one sentence right  
5 there, "there are 7 that my guys are staying at," I'm not entirely sure. I think -- because  
6 the guys they were talking to were not in D.C.

7 "2 have been raided." I know that they were talking to somebody that was in  
8 D.C., so I'm guessing that's -- I'm trying to recall. I do apologize.

9 Q Were they in Virginia?

10 A No, they were not in -- they were -- all of our guys were in North Carolina,  
11 but they were talking to guys that were there. So the only thing I can think of is my guys  
12 may have been speaking on -- that our comms operators were talking to somebody that  
13 was near or in D.C. at the time when they started putting out kind of an SOS.

14 That's what was going on and that's what I was talking about there, is there was  
15 an SOS going out from D.C. over ham radio.

16 Q Okay. I guess I'm not sure I understand, because the original post was  
17 about hotels in D.C. that you thought were being raided by police, but --

18 A Correct.

19 Q -- in your comments, you're suggesting that you know people who were at  
20 the hotels?

21 A Like I said, through the guys that I knew that were communicating, you  
22 know, those guys that I guess were either their friends or they knew on ham -- because all  
23 the ham radio operators know -- I mean, they seem like they know each other. I don't  
24 have a ham license. That's why I had a communications team doing it. But they seem  
25 to pretty much know each other, especially in the patriot community. They know each

1 other's tags, that sort of thing.

2 So when I say "my guys" there, I'm talking about the crew, people that are actually  
3 talking with each other. Right? They're currently, you know, giving intel. They're my  
4 guy, you know. That doesn't mean they're in my organization. That means, you know,  
5 they're currently giving us intel that's, you know, my intel coming in, sort of thing, is the  
6 way I would be saying that.

7 And I assume that was another patriot channel. Like I said, that's kind of hazy,  
8 but -- yeah.

9 Q Got it. So, just to make sure I understand, you were communicating with  
10 people who were in D.C., but they weren't part of the organization? Am I getting that  
11 right?

12 A No. I was communicating with people that were communicating.

13 Q I see. Okay. And you're asserting here that there weren't -- you were not  
14 communicating with people in D.C. on January --

15 A Right. I was not in direct contact with anybody that was in D.C. at any point  
16 in time, as far as I'm aware.

17 Q Okay.

18 Let's scroll down to page 3, please.

19 So you reference an intel channel for Real Patriots. "It's an Intel vetting and  
20 sharing channel for 40+ patriot groups."

21 A Correct.

22 Q Is that the channel that you were talking about earlier?

23 A I believe so. I believe that is it. Like I said, it's been a while ago, so that  
24 stuff is hazy still.

25 Q Okay.

1 A Yeah, but if I put that in there, it's probably correct.

2 Q What kind of information was being shared on January 5th and 6th?

3 A That was also where we were getting also confirmed intel reports that  
4 certain hotels were also being raided. So that's -- I think that may have been -- I don't  
5 know if I make the reference there, but I don't know what they're replying to exactly,  
6 what context that was in, but I do know, I recall from that night, in several different Zello  
7 chats, we had people talking about police raiding different hotel rooms -- or, not police,  
8 but authorities of some kind were raiding different hotels rooms. We didn't know who  
9 they were.

10 It was also, the information was coming over ham radio as well, from the reports  
11 of people that I was getting -- that I trust. So we were getting the reports from there;  
12 we were getting it out of Zello. And, of course, any -- if you ever worked with intel,  
13 that's pretty much, you know -- that's a cable confirmation, right?

14 So we're basically now trying -- I'm trying -- and I guess in this post here I'm trying  
15 to get to the bottom of it. What is going on? Has anybody else heard anything else?  
16 I'm basically trying to reach out and figure out, you know, exactly the scope and depth of  
17 what is going on here.

18 Q Got it.

19 And how many people were active on that channel?

20 A A lot. I couldn't tell you. It was, like, more than probably 200 or 300. It  
21 was a lot.

22 Q Understood. How does it work to hear audio or transmit audio if there are  
23 that many members?

24 A Exactly, man. It's -- sometimes people will be, you know -- well, Zello, as  
25 you know, they don't let you transmit unless the channel is clear, right? So trying to get

1 a word in edgewise, sometimes, when there's something really big going on, I mean, you  
2 almost have to yell out in the chat in text and basically say, you know, radio discipline,  
3 keep your -- you know, chats, you need to keep your stuff short.

4 But, yeah, it would sometimes just go constantly and you'd never press the  
5 button, because, you know, the channel was always occupied. Especially during this  
6 event, I remember that very clearly, it was very, very occupied.

7 Q Got it.

8 And was this channel created specifically for these couple days?

9 A No, sir.

10 Q Okay. Do you know when -- do you remember when you joined?

11 A Oh. I don't recall offhand. But Real Patriots is one of several groups that I  
12 had joined, and some of them, like I said, they even changed their names after  
13 January 6th. So they definitely were not specifically for January 6th, if you know what I  
14 mean.

15 Q Got it. And were there --

16 A I don't know when I joined that one.

17 Q Okay. Do you have a sense of why you joined or whether it was  
18 recommended to you?

19 A Yeah. It was recommended to me by that Miss Rogue again, Little  
20 Miss Rogue. She was a friend of mine in another channel. Very decent gal. Very  
21 peaceful sort of gal.

22 Q Uh-huh.

23 A And she said, you know, hey, these other groups or whatever are kind of  
24 massing in this group here and were trading information. I think it was because of  
25 COVID, to be honest with you, COVID lockdowns. I honestly believe that's -- I mean, if I

1 had to put my finger on it -- I'm not saying it under oath. I can say it on the record, but,  
2 you know, guessing, hazard a guess, it was because of COVID, the lockdowns.

3 Q Got it. Understood. So the channel was created during the lockdown  
4 period.

5 A Right.

6 Q And is this one of the channels that A.J. Andrews ran?

7 A Yes, sir.

8 Q Okay.

9 Does the username 1%Watchdog ring a bell?

10 A Yes, sir, it does.

11 Q Do you know who that is?

12 A I don't know him personally, but I've had a lot of patriots tell me that he  
13 is -- he is a mole, a spy, for the government.

14 Q Huh.

15 A Yep.

16 Q What makes you think that?

17 A People come out and said it. They come out and said it, that guy's a spy for  
18 the government. They said, I talked to that guy and then had the FBI show up at my  
19 door the next day. That would be that sort of thing, is what people say.

20 Q Huh. Interesting. So you don't know who his -- what his real identity  
21 was?

22 A No. I have no idea of his real identity.

23 Q Okay.

24 Were there other channels on January the 5th and 6th that you were participating  
25 in or that were as active as Real Patriots?

1           A     I mean, there could be. There was a lot -- well, I was on a lot of channels  
2     on January 6th, but not because of January 6th. When January 6th did happened, I did  
3     leverage those channels to try and collect information. I tried to, you know, gather  
4     intel.

5           The one thing I wanted to do -- and you might even have this exhibit there  
6     somewhere, I don't know -- but I was trying to test a couple members to see if they were  
7     actually in D.C. Because I didn't -- they were new. I didn't know if they had gone or  
8     not. But I'd put out the order that nobody was supposed to go.

9           We actually got intel before D.C. went down that there was supposed to be antifa  
10    and Black Lives Matter, one or the other, I can't remember, that were supposed to be  
11    dressed as patriots and they were supposed to be trying to rabble-rouse, right? They  
12    were trying to incite things. That was the intel I got.

13          And I immediately shut that down. I had a couple members saying they wanted  
14    to go, but I immediately shut that down, said, no, absolutely not, you can't carry firearms  
15    into D.C., and if something like that happens, it's going to be -- it could be a  
16    slaughterhouse, you know? And I said, that's not something I'm going to put any of my  
17    members in, and I'm not -- basically, I put my foot down and said, I'm not going to allow  
18    it. And my co-leader there would actually tell you that too, that I put that out.

19          And two of the members who were new I thought may have gone to D.C. So I  
20    did put out something at the time. I said, "Yeah, I'm here in D.C. Where you at? You  
21    know, can we link up?" That sort of thing. He goes, "Well" -- one of the guys said,  
22    "Well, I thought you said you were not in D.C." I was like, "No, I went to D.C." I was  
23    like, "Where are you at right now?" He goes, "I'm in Raleigh." I'm like, "Are you sure?  
24    I thought you said you wanted to go to D.C." He goes, "No, I'm in Raleigh." And I said,  
25    "So I can meet you in Raleigh right now?" "Yep." So that was the end of that.



1           But, yeah, there was a point in time where I did -- I did say that once. It may  
2           have been more, I don't know. But there was two of them I was thinking that was in  
3           D.C. And the way I see it, you know, if you're trying to get truth out of somebody like  
4           that, that's one way to go about it, if you don't trust them. And I didn't trust them, so --

5           Q    Got it. Do you still have records of those texts?

6           A    They were on Facebook, I believe.

7           Q    Okay.

8           A    I do believe those texts were on Facebook.

9           Q    The order not to go?

10          A    That was on Zello.

11          Q    Okay.

12          A    But I don't -- I don't know if you guys have access to Zello somehow, but  
13          Zello deleted those channels.

14          Q    Got it.

15          A    A long time ago.

16          Q    Yeah. I mean, if there's any record of what you were saying, how people  
17          wanted to go and you said not to, that would be helpful, if you're able to turn anything  
18          up.

19                Why did you think that D.C. would be a dangerous situation on January 6th?

20          A    Because we got intel that antifa and Black Lives Matter would be there  
21          dressed as patriots, trying to, I guess, misdirect, that sort of thing, trying to get people in  
22          trouble, or maybe even trying to counterprotest.

23                And it was like, if you can't have firearms, knowing how Black Lives Matter and  
24          antifa conduct themselves -- they beat people up and everything else -- no, it's a  
25          tinderbox.

1 Q Uh-huh.

2 A So, no, that was -- it was a bad situation. I didn't feel comfortable with it.  
3 I mean, like, call it a gut feeling. Yeah.

4 But, like I said, the intel was -- the intel had nothing to say about, oh, you  
5 know -- did I ever get anything saying, we're going to raid the Capitol? No. Never  
6 happened, right?

7 The intel we got was just that, plainly, that antifa, Black Lives Matter were  
8 planning on showing up, and they were planning on showing up in, like, Trump hats and  
9 everything else, like, pretending to be patriots. And that is not -- like I said, that didn't  
10 sit right with me.

11 Q Uh-huh. Where was the intel coming from?

12 A We had it both in Zello -- we also had a member that was in antifa that was  
13 feeding us some of that. So, yeah.

14 Q Got it.

15 And was there -- there have been other events where antifa was present or Black  
16 Lives Matter was present earlier than -- sorry -- before January 6th. Did any of those  
17 experiences inform how the Zello channels of Real Patriots and the other channels were  
18 talking about what to expect on January 6th?

19 A I can't say for sure. I do recall conversations going on about, you  
20 know -- we actually delivered the intel in there, that, hey, we had strong intel, had reason  
21 to believe that they would be there dressed in patriot clothing. We did put that intel up  
22 there. We had it confirmed by a couple of people who said they got similar intel.

23 But as far as I'm aware, as far as allowing their past experiences or whatever to  
24 kind of affect what they were going to see, I can't say for sure.

25 Q Well, I guess what I'm asking is, why was January 6th different than other

1 situations where -- for example, November 14th in D.C. and December 12th in D.C., there  
2 were other major Trump-related rallies. So why was January 6th different?

3 A I don't think I can answer that. I don't know. I don't know why it was  
4 different.

5 I mean, if I had to hazard a guess, I would say that, you know, somebody didn't  
6 want the Republican Congressmen to challenge the electoral count. I mean, that's my  
7 thing. I mean, if you don't want them to challenge it, I mean, put Congress under threat,  
8 you know? Get Senators to change their minds about challenging it. I mean, if you  
9 want me to guess, that would be my guess.

10 Q Understood. Great. I mean, this is really helpful.

11 Could we pull up exhibit 18, please?

12 Thank you.

13 So this is a post from January 6, 2021, at 11:08 a.m.

14 And if you could scroll down please, Heather. Oh, up a little.

15 So, in response to somebody who I guess called you a "fedboi," you said you were  
16 "not safely behind a keyboard but, whatever."

17 And then, [REDACTED] if you could scroll down a little bit --

18 A Oh, I'm saying this -- this guy right here, I'm saying that because we had an  
19 FTX that he refused to show up to, and the -- he said he was coming out to the Roxboro  
20 event and never came out. This guy --

21 Q Got it.

22 A -- this particular guy. So, yeah, this conversation's heated because of that,  
23 by the way.

24 Q Fair enough.

25 Well, the last comment on this page, you wrote, "Wait, and you would know that

1 I'm in my room right now coordinating my teams instead of outside protesting, how?"

2 So help me understand that. Were you coordinating any teams?

3 A No. He basically said right there, if you're looking at it, he's calling me a fed  
4 right now.

5 Q Uh-huh.

6 A And I asked him -- I'm asking him then, how do you know that I'm in my  
7 room right now coordinating my teams instead of outside protesting? If I recall  
8 correctly, he made the assertion that I was doing -- that I was, like, you know, inside of my  
9 house doing something.

10 Q Got it.

11 A So that's what I'm -- I'm clarifying there. I'm bringing it up; how do you  
12 know?

13 Q So what were you doing?

14 A At that particular time, I was at home working on websites.

15 Q Okay. So you weren't coordinating any teams?

16 A No. Just, we were going through intel, that sort of thing. We were talking  
17 about coordinating a way of getting people out of there if they got trapped, that sort of  
18 thing. So we were, I guess -- I mean, you could call that coordinating a team, I guess.  
19 But -- we were talking about getting people up to Virginia, if we could, to help get people  
20 out of D.C., you know, if it became a lot worse than what it was. You know what I  
21 mean?

22 Q Got it. And what did that coordination -- what did that entail?

23 A Basically getting up to and hopefully into D.C., getting people who were in  
24 there somehow getting them out and getting them to safety, that sort of thing. Because  
25 the way we were looking at things at the time was that it could be -- it was a tinderbox.

1 We knew it was a tinderbox, honestly. We already knew that. So our fear was that it  
2 would be a -- it could turn into possibly a mass casualty event.

3 We started to see the whole, you know, people gathering in front of the Capitol  
4 and all that kind of good stuff. We knew at that point, okay, we need to start looking at  
5 these contingencies right now. And we started having those conversations. We did.  
6 You know, is there anything we can do? Can we exercise this plan? Can we go after  
7 this plan?

8 So, I mean, yeah, was I talk- -- I was definitely talking to people. We were trying  
9 to coordinate, see if there was anything we could do, what we could do. And, like I said,  
10 one of the ideas was getting a team of people up to D.C. -- I guess not really into D.C.  
11 We didn't think we were going to be able to get into D.C. But at least get them up there  
12 past, you know, Richmond, in the Pentagon area, and, you know, load them up on trucks,  
13 buses, whatever we need to do, to try to get them out of there.

14 Q Got it. And this discussion was on the Zello channel with the multiple  
15 patriot groups?

16 A I think this discussion, in particular, was in Zello, it was on Facebook, it  
17 was -- yeah, I think Zello and Facebook is where these took place.

18 Q Got it.

19 Were you -- just, a specific Zello channel that came to mind and a particular  
20 person: Does the name Southern Patriot Council ring a bell?

21 A SPC? Yes, sir.

22 Q Got it. And Eric Braden? Does that --

23 A Not particularly, I don't recall the name, but --

24 Q I think he went by General Lee or General E?

25 A Oh, I know him. I've talked to him, yes, sir.

1 Q Okay. Was he active on these channels too?

2 A Somewhat, yes, sir.

3 Q And was he involved in the coordination as well?

4 A I -- that I can't recall. I'm not -- I don't know by name if he was actually  
5 speaking or not. Yeah.

6 Q Yeah.

7 So help me understand -- I mean, I understand you're in North Carolina on Zello  
8 talking to other people on the same Zello channel. What does that -- and I understand  
9 you weren't there, but what does that look like in real life?

10 You know, I'm assuming that many of these people don't know each other on the  
11 channel, correct?

12 A Correct. Yes, sir.

13 Q So what does coordination mean in that context? Like --

14 A Well, coordination means --

15 Q -- that's a lot of people.

16 A Yeah. Coordination means basically trying to plan something out, deciding  
17 who's going to do what, who's going to get what task, if this plan was to get executed.  
18 In other words, we're coordinating a plan. So, as you say, it was more or less planning.

19 But, yeah, coordination in that sense is definitely, you know, divvying out who's  
20 going to be responsible for what duty here and, you know, getting people up there and  
21 getting people out.

22 Q Got it.

23 And do you have a sense of what other groups were on these chats and who was  
24 talking to each other?

25 A Lord, yes, we do. We had -- I think Light Foot was in there. I think it was

1 III% AP.

2 Q Okay.

3 A You had the CAP, I think it was, the Constitutional American Patriots.

4 Oh, Lord. Like I said, there's so many of them.

5 The one that was noticeably not there was III% UP, by the way. I can tell you  
6 that. They were not there.

7 Q Huh. Why was that?

8 A They were getting to the point where they were being shunned by a lot of  
9 the other groups out there. They knew they were getting kind of radical. And it's bad,  
10 but even, like, Security Force started to turn their backs on them because of that. So it  
11 was -- it was getting pretty bad.

12 But, yeah, they were noticeably not there. We all -- our entire organization  
13 noticed that one. They were not there for that.

14 Q Security Force, that's the III% SF group that you mentioned earlier?

15 A Right, the really radical one. Right.

16 Q Right.

17 And when you say III% UP wasn't there, was it just III% UP North Carolina wasn't  
18 there or --

19 A The whole national organization was not there. Yeah.

20 Q Got it.

21 A No State.

22 Q Got it.

23 Let me see --

24 A And that does at least tell me, you know, they're trying to keep that channel  
25 kind of -- you know what I mean? -- non-extremist, if you know what I mean?

1 Q Uh-huh.

2 A Yeah.

3 Q And was the Security Force in those discussions?

4 A No, sir, Security Force wasn't there either.

5 Q All right.

6 Were there any particular individuals who you remember as being particularly  
7 active?

8 A A.J.

9 Q Uh-huh.

10 A Definitely A.J. was active. I mean, but, like I said, I don't remember him  
11 doing anything, saying anything wrong.

12 Little Miss Rogue was active. Again, they were more inquisitive and trying to  
13 figure out what's going on, in that context. You know, they really were; they were trying  
14 to figure out what's going on.

15 Then it was, how can we help?

16 Q Uh-huh.

17 A I mean, that's the thing, is it was all about, you know, how can we help in  
18 this situation? What can we do to help, you know, get some of the patriots out of there,  
19 some of the other civilians, people trapped? You know, that was what I recall, those  
20 discussions.

21 Q Does the group Georgia Three Percent Martyrs ring a bell?

22 A No, sir.

23 Q The leader --

24 A That doesn't sound like -- that doesn't even sound like a group I'd want to  
25 associate with, to be honest with you.



1 Q Well, the leader is Justin Thayer, and I think he goes by Slayer.

2 A I've heard of that name, yep. I've heard the name Slayer.

3 Q And then Three Percent SoCal, does that ring a bell?

4 A No, sir.

5 Q Okay. Alan Hostetter?

6 A That name doesn't ring a bell.

7 Q All right. No worries.

8 So I want to stay on this exhibit and go to page 3, please.

9 So I want to ask about this sentence: "If one of my guys die, it will have a  
10 maximum effect. We've already sat down and gone over all of that. We are ready if  
11 other patriots are."

12 A Correct. We're talking about now a hypothetical, right? So that situation,  
13 I mean, yeah, we'd already gone over, and even in training. If we ever get to this point  
14 where we have to go out and fight, are we prepared for that?

15 And that's, actually, I guess you'd say, a part of weeding out people; you know, are  
16 you prepared to pay that price? Because that's what -- you know, you're signing up for a  
17 militia, so that's what you're signing up for.

18 Q Uh-huh.

19 A This guy didn't seem to understand that. And that's really -- like, again, for  
20 this particular guy, Jon Cobb, I'm harping on him about that because he -- like I said, when  
21 people needed him, he didn't show up. I mean, it was a legal thing, you know. I mean,  
22 people, his community, needed him and he didn't show up. So, yeah, I'm hammering  
23 this guy pretty hard. I'll be honest with you, that's what I'm doing, I'm hammering him  
24 pretty hard.

25 Q Yeah.

1           And I know I've asked this before in another context, but "my guys," does  
2 that -- what does that refer to?

3           A     I'm looking here. Where does it say -- hold on.

4           Q     "If one of my guys die."

5           A     Again, hypothetical. You know, if it's one of my guys that die there, you  
6 know, then it's something that, you know, we're prepared for. It does not necessarily  
7 mean that they're there. It's just, I'm letting him know that, you know, that's something  
8 that we've trained for.

9           Q     Uh-huh.

10          A     And, like I said, he's one of those that doesn't understand that, you know -- I  
11 mean, he's, in my opinion, one of those that just thought it was cool.

12          Q     Well, what do you think of the decision by some of these Three Percenter  
13 groups to go to D.C. on January 6th?

14          A     Because you made the decision and you made the decision for your group that  
15 you wouldn't be going. And it sounds like III% UP didn't go as well. So what were you  
16 thinking they were going to accomplish or that they might encounter up there?

17          A     Well, as far as I was concerned and everything that I knew, they were there  
18 to protest the counting of the votes. And, I mean, I'll be honest with you, I didn't quite  
19 understand how you're going to protest the counting of the votes. It's going to happen  
20 no matter if you want it to or not, you know? And I was like, there's -- you're not.

21          A     And there's also another Facebook post you could check, too, but when I first saw  
22 the streams coming in of the whole breaking in through, you know, Nancy Pelosi's office  
23 and all that, I mean, I even put it out there; I said it's stupid. You cannot start an  
24 impromptu revolution like that. You're absolutely stupid. You're off your rockers. I  
25 was telling people that in their streams when they were streaming it.

1 Q Uh-huh.

2 A I was like, you're absolutely off your rockers.

3 But, I mean, that's -- I did not fathom -- I couldn't fathom that anybody was going  
4 down there to start a riot, right? That was not something I could even begin to fathom  
5 there.

6 If they wanted to go down to protest, the one thing that I have a problem with is  
7 people who try to protest with a firearm. Right? You know, you're trying -- not unless  
8 you're protesting, you know, to get the Second Amendment back or something, you're  
9 protesting, like, you know, overreaching gun laws. Okay, I could see you protesting with  
10 a firearm, right?

11 But, otherwise, if you're going out and protesting, you know, abortions or  
12 anything else, in my opinion, I don't think -- and it's the law in my State, you're not  
13 supposed to protest with a firearm. And I absolutely support that. You know, you  
14 need to go out there and not try to feel like you're intimidating people.

15 So I knew that, by virtue of going into D.C., they were not going to be able to carry  
16 firearms. So if that's what they want to do, if they want to protest, you know, that's  
17 their decision. It's not my groove. And I was just -- I guess you could say my hope was  
18 that they'd be smart about it.

19 Q Uh-huh. That's helpful.

20 Can we go to page 5 on the same document?

21 Right there is good.

22 So, in the first comment on this page, you wrote, "There is a reason why Trump  
23 set this date, himself, for the rally on the date of the certification. Do the math."

24 A Uh-huh.

25 Q Did you think that -- well, can you help me understand what "the math" is

1 here?

2 A I mean, basically, if you notice right there, I mean, I gave you the answer kind  
3 of right there. So, if it's certified -- read it closely -- it's over. It's already certified, in  
4 other words, is what I was getting at. You're not going to be able to stop this.

5 It says, "There is a reason why Trump set this date, himself." Let's see. I'm  
6 trying to remember. Man, I'm telling you, I'm having a hard time recalling this  
7 conversation, but --

8 Q Well, let me ask you --

9 A Okay. So what I'm saying is that Trump called a rally, I think, on that date,  
10 if I'm not -- if I'm not mistaken, I think it was Trump who called the rally, asking for  
11 patriots to rally or whatever, he was gonna have a rally, I can't remember.

12 But I was basically talking about how -- and this is gonna kinda set the stage  
13 probably for the rest of the -- I think, might, if I'm recalling this conversation -- kinda sets  
14 the stage for what was getting ready to come after, and that is that I believed -- even still  
15 now I believe that there was some Federal involvement to set people up.

16 And this is kind of what's going on here. I do believe that this is where I'm  
17 coming out with that, that, you know, things that are going on in D.C. was kind of -- kind  
18 of a set-up for that.

19 And, like I said, I have a ton of things that I base that on -- like, seeing Capitol  
20 Police, you know, opening the barricades, opening the doors. Now, you know -- stuff  
21 like that. Like I said, I saw that on livestream.

22 And, like I said, in this case, I can't remember if the riots had happened yet or not,  
23 but if they had already happened, that was -- that was definitely what I was talking about,  
24 I do believe.

25 Q Got it. And do you think Trump was involved in that?

1           A    What's that?  No.  That's the thing, is I think it was used -- so Trump set  
2           the rally, and I believe other actors and the state used that as a way to deter Senators  
3           from protesting the electoral counts and also use it as a way of persecution, to be honest  
4           with you.

5           Q    Uh-huh.  So I'm hearing, if I understand you correct, that you maybe  
6           distrust many Federal officials, right?  Is it fair to say?

7           A    That's fair.

8           Q    What makes Trump different?

9           A    He's an outsider.

10          Q    Were there particular things that he did or said that made you think that he  
11          was on your side?

12          A    No.  Actually, there's things he said and did that made me think he was not  
13          on my side.  I started to distrust him more and more at the end of his Presidency  
14          because of his ban on the bump stocks.

15                Also his -- him with his -- the NICS, the "Fix NICS" omnibus, the provision in the  
16          omnibus that came out, I think it was in 2019, 2020.  I can't remember exactly.  But  
17          basically there was a law that was slid into that that targets veterans, and, myself being a  
18          veteran, I was a little upset about that.

19                You know, it basically says that, if at any point in time the VA declares or I declare  
20          to the VA that I don't handle my own VA compensation check, that they can basically put  
21          me in the NICS database where I cannot buy firearms anymore.

22                And I'm like, that's wrong.  That's wrong.  I mean, say, okay, my wife's an  
23          accountant, she handles my VA check, put it in her name.  Okay, I lose my right to  
24          firearms.  That's -- you know, that's absolutely utterly rubbish.  That's garbage.

25                And so, yeah, when he signed that into law, I was a wee bit upset, so -- yeah.

1 Q Got it.

2 Well, so going back to this comment in particular, did you think that Trump had  
3 set -- I guess I'll just ask a very specific question. Did you think that Trump was hoping  
4 that the certification could be stopped if there was a rally on that day?

5 A I'm thinking yeah. I'm thinking he was -- if you want, again, speculation, my  
6 speculation was that. If he had a big enough rally there, he could probably intimidate  
7 some of the Republican Members of Congress to actually, you know, not really challenge,  
8 but demand an investigation before they certified.

9 Q Uh-huh.

10 A At least, that was my, like, again, my best guess, my speculation.

11 Q Got it. And how -- so would it just be that, you know, large numbers of  
12 protesters would send a message to those Members of Congress? Or was it something  
13 else, some other way to convince them to stop the certification?

14 A Well, if he was going to stop the certification, my idea, I guess the way I  
15 would've gone about it was to create that rally before the certifications happened,  
16 basically to kind of send that message to Congress that, hey, you know, these guys are  
17 upset, they're curious about, you know, fraud, that sort of thing, so, I mean, the least you  
18 need to do is, you know, get them an answer before you certify this thing, right --

19 Q Uh-huh.

20 A -- you know, one way or the other. Investigate it thoroughly. Don't, you  
21 know, glance over it, you know, whitewash it, or anything else. Just go ahead and start  
22 the investigation.

23 You have to have a provisional President, whatever. I don't know how that  
24 would work. I don't think the Constitution had any provision for that at all.

25 But I'm just saying, if it -- my -- I didn't foresee at the time that Trump was going to

1 tell people to start rioting or suggest it in any way. As a matter of fact, from what I saw,  
2 he said, you know, we're going to have a peaceful protest, you know.

3 Q Uh-huh.

4 By the way, when did you first hear about January 6th as a date to gather in D.C.,  
5 do you remember?

6 A I don't recall. I know it was before January 6th. Yeah. But it was, you  
7 know, more of a "the President has asked us to come down" sort of thing.

8 Q Got it. Yeah.

9 And I think a couple weeks before January 6th the President tweeted about, you  
10 know, the fact that it'll be wild on January 6th. Does that ring a bell?

11 A Yeah, I recall -- I don't recall that particular tweet, but I recall him making a  
12 tweet like that, basically asking people to come down.

13 You're right, I think I actually do recall that. "It will be wild on January 6th."

14 Q Uh-huh. Yeah. Was that kind of the first time that it came onto your  
15 radar?

16 A I'm not entirely sure. I can't -- I remember that tweet, and I'm sitting here  
17 going, well, obviously that's a bigger crowd than what I want to be in, right?

18 Q Uh-huh.

19 A I don't like crowds. Ever since the Army, I've never -- I've not liked crowds  
20 at all. But, yeah, that's the first thing I thought, is bigger crowd than I want to be in.

21 I didn't want to go to begin with because no firearms in D.C. So there was a lot  
22 of reasons, like I said, I was -- I was seeing that and I was just, like, kind of turned off by it.  
23 But --

24 Q Yeah.

25 A -- if people want to go protest, the way I see it, that's their decision, not

1 mine.

2 I mean, like I said, I firmly uphold the First Amendment -- that is, you know, for  
3 people to go out and demonstrate, as long as they do it peacefully. I don't care what  
4 the message is, as long as it's peaceful, right? They can say they support violence, I  
5 don't care, you know, as long as it's peacefully supporting violence, you know. That's  
6 my opinion.

7 Q So, after Trump tweeted, you know, "will be wild on January 6th," did you  
8 hear discussion about that on social media, on Facebook or Zello?

9 A Oh, yeah. People were retweeting it right and left. Yeah, absolutely.

10 Q Yeah. Do you remember what people were saying? You know, just, was  
11 it "gather in D.C."? Or people started to prep for travel?

12 A Well, in that particular sense, I think a lot of people got an idea there was  
13 going to be a lot more people there than what we thought was going to be there, right?  
14 And that may have been some of the President's way of marketing it, you know? A  
15 bandwagon sort of thing. But, yeah, that's -- I mean, that's the way I interpreted it.

16 Yeah, I saw people retweeting it, talking about, yeah, it's going to be crazy, going  
17 to be a huge crowd.

18 Q Uh-huh.

19 A Yeah.

20 Q I wanted to just stick with this exhibit real quick and go to page 8, please.

21 And the comment I wanted to ask about -- earlier in the comment chain,  
22 somebody pointed out the guy with the hat with the horns on it and said basically, you've  
23 been infiltrated.

24 And, [REDACTED], can you scroll down a little bit, please?

25 A What? I've been infiltrated? Okay --



1 Q No, no. The group in the Capitol. I saw that somebody said that.

2 And then you wrote later on, "I can't help who was at the rally but we did turn  
3 those two away from us." And then you talk about them a little bit more.

4 A Okay. So this was an ongoing stream that I was watching on the Capitol.  
5 We had a whole bunch of people in that stream watching, commenting, that sort of thing.

6 This particular guy, I remember seeing him. And I'm like -- look, that was the first  
7 thing that I brought up. I was like, this guy has an entire media entourage following him  
8 around, right? Something isn't right. It smells funny. That sort of thing.

9 And, at this point, I believe he said, well, you guys have been infiltrated. I'm like,  
10 no, we haven't been infiltrated. And, you know, then he comes up and says, well -- I  
11 can't even remember the other parts of the conversation.

12 But this particular thing, we're talking about -- or this particular comment, we're  
13 talking about that guy and being a plant, basically.

14 Q Uh-huh.

15 A He's absolutely a plant by somebody. We don't know who. I guess that  
16 was the QAnon shaman.

17 And you'll see in other conversations, as well, where I actually go on to say, that  
18 guy -- QAnon's not who -- that's not the real QAnon. I mean, none of those things that  
19 we'd been seeing come out about Trump, the Trump supporting, that's not the real  
20 QAnon. And you'll see posts on my website where I've said that over and over and over  
21 again; this QAnon thing is fake.

22 I know -- I mean, I may or may not know who the organization of QAnon is from  
23 military involvement, but they're not an organization that does this stuff, right? You  
24 know, leaking stuff to the public. They leak things to the authorities, you know. That  
25 was my understanding of QAnon.

1

2 [12:13 p.m.]

3

BY 

4

Q I actually did see that on your website. That you said that you knew who Q

5

was?

6

A Right. Well, I know of the group, yes.

7

Q Who is Q?

8

A It's a military unit, a military unit that is in COMSEC that gets to see and hear

9

communications and that sort of thing. And the whole thing was, as I posted up there,

10

when you get that information, you see somebody high ranking doing something illegal

11

under the protection of the National Security Agency under, you know, top secret

12

clearance or whatever, there's not much recourse that can happen unless people stand

13

up and say, okay, somebody in the police needs to see what's going on. But you can't

14

send them that information. You know, legally you can't send it. I mean, well, by the

15

NSA, you can't send it.

16

So the idea behind QAnon was how do you drop the information off to an

17

investigator that would put them on the right trail? And that's really what it became

18

about is dropping just enough that you're not violating national security and dropping off

19

that would put them on the trail to figure out, you know, the crime.

20

And that's what I was telling people is that's not the real QAnon. The way they

21

did the Q drops and everything from everything I've used to recall, it's nowhere near the

22

way they would, their methods, so to speak.

23

Q Uh-huh.

24

A The other thing I found funny too is that the QAnon that I remember -- and

25

it's not one individual, by the way. But the QAnon I remember would not ever take a

1 side in politics. It's extremely neutral. Right. So the fact that they said, Well, QAnon  
2 posted this about Trump really got my attention because it's, like, that's weird. It's odd.  
3 And about a year later, QAnon really started, like, dropping all sorts of information that's  
4 pro Trump, pro this and this and that. Oh, don't worry. Trust the plan. And I was,  
5 like, no, no, that's not QAnon. That's definitely not QAnon.

6 So, yeah, that is something that I protested about and posted about. I was trying  
7 to get other people to stop the madness of every time they post something, it would be  
8 absolutely wild and insane and outlandish. Oh, yeah, like, one of the things was that  
9 QAnon posted is that somehow or another Trump was going to become President a  
10 couple of months after January 6th, somehow, because of the way the law is written in  
11 the Constitution, or something, that he could -- that the United States would be dissolved  
12 as a corporation and reformed.

13 And I'm sitting here, like, what sort of mental gymnastics, what drugs do you have  
14 to be on to play these kind of mental gymnastics? Right. And I think I even said that,  
15 maybe on the website. But that was bad. It was just insane. That stuff was insanity  
16 and boggles my mind.

17 So, like I said, really early on, I said no to QAnon. So yeah.

18 Q In your experience, was there a lot of Q-related chatter in the channel that  
19 you were on?

20 A Yes, sir, there was.

21 Q Got it.

22 A There was, and I was the first one to stand up and say, You're crazy,  
23 absolutely crazy. This QAnon stuff is bogus. Like, I told people, the stuff you want to  
24 believe, like, you've got to remember everything that Q gives you is always good, good,  
25 good, and it's too good. It goes back to the old philosophy, if it's too good to be true, it

1 probably is, you know.

2 And as I said, the metrics in which Q uses doesn't match up. You know, the way  
3 they drop the information, it doesn't match up because they drop the information and  
4 then leave it at that. They would take a side. And the way you basically say, Look for  
5 this, look for that, um, that's not nowhere near what I remember. All right.

6 And when they started talking about how, you know, Trump is going to -- or Pence  
7 is going to cancel the electoral votes, it's, like, legally he can't do that. I was telling  
8 people early on, this is going to happen. Right. The whole President -- Biden is going  
9 to be the next President. I was telling people that early, early on. I was, like, you're  
10 not going to be able to stop it, I said, not unless, not unless the investigators somewhere  
11 find a significant amount of fraud, and they basically have to get the State to decertify.  
12 It has to be a significant amount of fraud. And I said, Once they find that, I said, it is up  
13 to the board of elections, but they can decertify. I think there is a pathway for that.  
14 And I said, That is the only way that Trump becomes -- you know, continues to be  
15 President. I said, As it stands, I said, these processes are slow and long. It's not going  
16 to happen.

17 And people kept pairing this whole QAnon mess, QAnon this, QAnon that. I got  
18 sick of it, to be honest. I really did, I got sick of it.

19 Q On January 5th and 6th and the channels that you were listening to, were  
20 people talking about what was going to happen or what they expected to happen in  
21 terms of Q?

22 A Um, actually, Q -- that was -- honestly, I don't know whose side Q was on  
23 because the intel that I heard or that they were saying, Q was saying is that we don't have  
24 to go to this rally because, you know, Mike Pence is going to get -- you know, he's going  
25 to block the certification, so we don't even have to show up. That was the intel I got.

1           And I was just like -- and, of course, I guess you could say it's the only time I really  
2 encouraged people that, you know, you probably should, you know, go to the rally then.  
3 And I said that kind of jokingly. I wasn't -- I didn't mean it. It was kind of a joking thing.  
4 But basically I was, like, well, if QAnon said that we should stay away, we should probably  
5 go, you know, sort of thing.

6           Like I said, I had gotten sick of it, the whole QAnon thing. I really did. And you  
7 see I called it on the website, it says "QAnon scam." I came out and called it a scam.  
8 Right. Like I said, I was sick of it.

9           Q    Uh-huh. Let's see -- this is really helpful, Mr. Wells. We're getting closer  
10 to the end.

11           Can we pull up Exhibit 17, please?

12           And by the way, I wanted to ask, did you hear anyone talking about maps of the  
13 tunnels under the Capitol?

14           A    I had -- I have heard of them before, yes. And I had heard those -- I can't  
15 remember who, but yes, I had heard that. Yes, I saw that on the video, that right there.

16           Q    Can we scroll down to page 2, please?

17           And just to quickly return to the tunnel question, do you remember the context in  
18 which people were talking about the tunnels?

19           A    People were asking -- I remember somebody asked something about if there  
20 was tunnels under the Capitol Building, and somebody had said something to the tune of,  
21 yeah, I think there's tunnels. And I even made the remark, I said, If there is, you know,  
22 that is where -- I said, that is where the Congressmen will go if there was a threat, and I  
23 think that's still true today.

24           But I think I may have made that comment, and it's only logical. You know,  
25 something like that, you have a ground threat that is coming in, I mean, you're not going

1 up to the roof because there's nowhere to go. Right? Yeah.

2 Q Got it.

3 So when other people were talking about the tunnels, were they talking about  
4 how to navigate the tunnels?

5 A I can't recall. I don't think so.

6 Q Okay. And did you see, like, maps being shared or anything?

7 A No, there was not -- I don't think there was any maps being shared. I don't  
8 recall. Yeah, that would be kind of weird to think if there's maps being shared.

9 Q Yeah. That's okay.

10 I wanted to ask right here in the middle, it looks like you're talking to Jon Cobb  
11 again on another post. And you write: "No, there were several of us on the ground  
12 that saw it. It's not BS man.

13 "Follow my other post, Lenny is about to dump a lot of videos in replies to archive  
14 everything."

15 A Yeah. So, again, I'm identifying as us there. That is an identity issue as far  
16 as being a patriot, being a militiaman, we, us, that sort of thing. I said: "Follow my  
17 other post." I'm talking very specifically about another post in which Lenny, who was  
18 basically sitting there collecting a lot of the videos coming in, he's recording them,  
19 downloading them and collecting them, and he is pretty much making a list -- I think we  
20 actually have some of them on our website now where he made those lists.

21 But basically made a list of all of this stuff going on. That is the female that got  
22 shot there, which basically she was just sitting up there in the window. As far as we  
23 could see in the video, she wasn't armed or anything, but got shot. We had a video of  
24 that. We posted it. He archived that. And that's what we were letting him know  
25 there that he has those -- that Lenny has those particular videos already, to which this guy

1 was basically saying, You're lying about that. It didn't happen. I'm, like, No, it did. It  
2 absolutely did happen, so --

3 Q Got it.

4 And who is Lenny?

5 A Lenny is -- I think his last name was Stroud.

6 Q Do you mind spelling that?

7 A S-t-r-o-u-d.

8 Q Okay. Was he someone in Guardians of Liberty?

9 A At one point, yes, but he never signed up on the website. So he was there  
10 after we -- in other words, he was in channels and stuff, but he have never signed up on  
11 the website. He was, like, on Zello, maybe on Facebook. I can't remember. Yeah, I  
12 know he was on Facebook. I can't remember any conversations on Facebook, but he  
13 was on Zello at the time.

14 Q Got it.

15 A Yeah.

16 Q And was he posting videos that he was taking from inside the Capitol?

17 A No, no. He was getting it off of Facebook. He was archiving it. Basically  
18 he was converting -- he was downloading the videos because he was afraid Facebook  
19 would come around and start deleting the videos. So I told him, You'll get the videos,  
20 download them, get them all downloaded, put them in a ZIP file, or something. And I  
21 said, We need to actually archive and save these videos because I don't trust Facebook  
22 any further than I can throw them.

23 Something like that happens, yeah, you best get an archive of it, so -- especially  
24 when it's something like that going on and you're stuck -- you've already seen livestreams  
25 disappear and go poof, yeah, we were getting videos. We were getting videos.

1 Q Do you have any of those videos?

2 A Oh, absolutely.

3 Q Would you be willing to share those with us?

4 A Sure can.

5 Q That would be great.

6 Sorry. I'm just making a note of that. I can follow up with you after this.

7 Okay. And we've kind of -- we've touched on the subject a couple of times, and I

8 know you've written about it on your blog, but I wanted to just get your explanation of

9 the use of "we" and "us" --

10 A Uh-huh.

11 Q -- in terms of what happened on January 6th.

12 A Okay. So I'll go ahead and I'll touch on that.

13 So as soon as the -- I saw personally -- I got a call, Okay, look, it's started, it's

14 rioting. And I started watching livestreams. And then, of course, the next thing I do is

15 turn on the news, and the first thing I hear over the news is Trump supporters have done

16 this, it's the militia has done this, this patriot movement is responsible for this or that.

17 And from that point forward, it was we, me -- you know, it was we and us at that

18 point. The way I see it is if they're going to wrap me in the group and say all Trump

19 supporters, you know, that sort of thing and they're responsible for this, then, you know,

20 I'll bear the thing. Because, you know what, if you want to come after somebody, come

21 after me. That's the way I see it.

22 And it got worse. It was a couple of days later you even had a Congresswoman, I

23 think she was in Michigan, or whatever. You had a Congresswoman coming out and

24 threatening Trump supporters, telling the military they know what they need to do, they

25 need to go out and get them. And I was, like, come on, come on, get me.



1           So that's what that means. That's my statements there, we, us. Like I said, I  
2 mean, you saw the GPS data. I wasn't there.

3           Q    Yeah, and I understand that.

4           And there were a couple more posts that we saved as exhibits that I wanted to ask  
5 a pretty similar question in terms of "our guys," the use of "we" and "us," but your  
6 explanation is helpful.

7           ██████████. Actually, I see ██████████ came off mute. So do you have a  
8 question?

9           ██████████ Yeah.

10          BY ██████████

11          Q    Mr. Wells, I'm struck by the use of "we." Is this we -- can you describe, like,  
12 the group? Is it patriots? How would you describe yourselves?

13          A    All of the above, all of the above. Militia, patriot, Trump supporter, all  
14 three of them were attacked within hours -- I mean, within minutes of this thing  
15 happening, all three of them. The whole groups they didn't care who it really was.  
16 They didn't care who was going in the Capitol. They didn't -- I mean, they just -- okay,  
17 they had MAGA hats on, so it was all Trump supporters. It was all the militia.

18               Like I said, it was like within minutes, as I recall, and it was infuriating. It was  
19 absolutely infuriating that something like that, that the media would just all of a sudden  
20 start throwing blame. And it wasn't just me. Like I said, it was Congressmen, people in  
21 government. Like I said, I quickly identified as we and us on that.

22          Q    Okay. And when you say patriots, exactly what do you mean by that? I  
23 assume that was the definition you had before January 6th.

24          A    Okay. Patriots meaning, I guess you could say, patriot-type groups. That  
25 was the term they used, these patriot groups, these pride groups -- not pride -- the white

1 supremacist groups, you know, that sort of thing, which seems to be almost, you know,  
2 what I used to call patriotism, is kind of, you know, synonymous with that now.

3 Like I said, there's a lot of political things like that that I got a very big  
4 disagreement with. Like I said, I didn't support the attack on the Capitol. However,  
5 like I said, when the media started that lambasting of, you know, trying to group  
6 everybody into one box and say, oh, it was the patriots, it was Trump supporters, yeah, I  
7 took offense to that. And I very well aired that out and said, you know, well, if you're  
8 going to come after somebody, let them come after me.

9 Q All right. So how would you define a patriot then?

10 A I would define a patriot as anybody who is willing to stand up and die for the  
11 country and, you know, doing what is right, supporting the Constitution, supporting the  
12 government, so long as the Constitution supports the government and, you know, the  
13 government supports it.

14 I mean, I would define patriotism as somebody who's willing to take those risks,  
15 up to and including, you know, death, if necessary, to defend their Nation and, you know,  
16 not attacking for it, but defense.

17 Q But it sounds like you don't support the attack on the Capitol?

18 A No.

19 Q So would you say those people were patriots?

20 A Absolutely not.

21 Q Right. And afterwards, though -- I'm trying to square the circle a little  
22 bit -- when you identify with "we," these groups that are being attacked, you're not  
23 including the people who went into the Capitol?

24 A Well, I'm including who the media is calling patriots, Trump supporters,  
25 which is all of them. I don't see the people who went -- okay. The people who went

1 into the Capitol, I can't tell you. I can tell you this. The people who broke into Nancy  
2 Pelosi's office are not patriots. Okay. The way I saw the videos, the Capitol Police  
3 opened the door. They are the authority. Right? They're under the command of  
4 Nancy Pelosi. Right? Am I wrong?

5 I mean, so if they're under her authority, they opened the door, it's not  
6 trespassing for people to walk in. They reasonably assumed they have access to the  
7 building. And when they walk up to a locked door and they beat it down and go inside,  
8 that's breaking and entering. They should go to jail a hundred percent. Right.

9 But the people that walked in that day, I would still say, okay, they're patriots.  
10 The ones who started committing violence, no, they're not. Right? The ones who  
11 went into Nancy Pelosi's office, the ones that took DOD laptops, they're not patriots.  
12 Okay. That's off the books. That compromises national security right there. I mean,  
13 that should be something, you know, no patriot would ever do. It should be, you  
14 know -- even Three Percenters wouldn't do that, I mean, the way I would see it. That  
15 goes against the support and defend the Constitution, which is we, the people. When  
16 you do that, you are putting all the people in danger.

17 So now I don't identify the people who broke into Nancy Pelosi's office or became  
18 violent or whatever, I don't identify them as patriots, but they're saying that all patriots  
19 were responsible. So I said "we," yes, sir.

20 Q Understood. And would you say that part of patriotism is supporting the  
21 peaceful transfer of power?

22 A Absolutely.

23 Q Thank you.

24 [REDACTED]

25 BY [REDACTED]

1 Q Thanks.

2 I just want to get through a couple more questions, and then we can take maybe  
3 another 5-minute break, if that sounds good to you?

4 A Absolutely. It's good with me.

5 Q Can we pull up exhibit 19, please.

6 Can you scroll down a little?

7 Right there.

8 So in this post -- this is from January 7th in the morning.

9 A Uh-huh.

10 Q And you wrote: "The 'REAL PATRIOTS' page doesn't exist - it was deleted  
11 by Facebook - we only exist on Zello and Signal now and I'll still there."

12 A Yeah.

13 Q We've talked about this channel a couple of times. Was there a Real  
14 Patriots page on Facebook?

15 A Yes, sir, I do believe there was. Actually, I'm pretty sure there was.

16 Q And was that active on January 6th or was it deleted beforehand?

17 A It was deleted January 6th, so it was -- no, actually, I think you might be  
18 right. I think it was deleted before January 6th.

19 Q All right.

20 A I absolutely do think it was.

21 Q And does that group still exist on Signal?

22 A I don't know about Signal. I know it used to exist on Zello. I can check for  
23 you if you want, but I don't think it exists on Signal. Like I said, I haven't used Signal in a  
24 long time. And when I did, it wasn't -- I mean, I didn't -- I didn't ever communicate with  
25 anybody on Real Patriots' own Signal. I only communicated on Zello.

1           Like I said, Signal was used very rarely. I've had people who say, Well, I only  
2 respond on signal or something like that. And I would tell them, Okay, call me over  
3 Signal, or something like that. That was it.

4           I hadn't looked into Signal, don't know how it works, so it was something I usually  
5 wouldn't mess with unless I understood it, how it worked. And their encryption and  
6 stuff like that, it wasn't clear how that worked, so I don't know how they maintained  
7 those groups.

8           Q    So I guess what I'm asking is, is there a current version of the same group of  
9 people or the same group of groups on some platform?

10          A    I don't think so. If there is, I'm not in that group anymore.

11          Q    Okay.

12          A    I think the Zello group got deleted or I got booted -- I don't know -- or, you  
13 know, and if that's happened, AJ has not sent me an invite yet back into Real Patriots.

14          Q    Got it.

15          All right. And can we pull up exhibit 15, please.

16          So this is actually going back to January 5th, and I just wanted to ask, who is Mike  
17 Kiesel?

18          A    I'm not entirely sure. I think it's "Kessel" for the last name.

19          Q    Okay.

20          A    But he is an acquaintance. I don't think we had ever met in person. I  
21 don't know if you guys have his location where he is, but, yeah.

22          Q    No. I was asking if he was perhaps a member of Guardians of Liberty.

23          A    I don't think so.

24          Q    And --

25          A    I would have to check and follow up on that, but I don't think so.

1 Q Okay. And he said in this post: "Seems to be about that time to water a  
2 famous tree."

3 I think I'm familiar with the quote, but I wanted to make sure. What is that a  
4 reference to?

5 A Okay. That is in reference to one of our Founding Father's quotes, and that  
6 is, "From time to time, the tree of liberty must be wet by the blood of patriots and  
7 tyrants."

8 Q Got it.

9 Do you have a sense of what he meant in the context of January 5th?

10 A Well, they say hindsight is 2020, so, yeah, I didn't think anything of that  
11 beforehand, but -- yeah, hold on a minute.

12 It says: "Getting reports in Zello that 4 popular hotels" -- I don't know. I think  
13 he might even be quoting me actually. I'm not sure.

14 Q Do you know if he went to D.C. on January 6th?

15 A I don't know for sure, no, sir.

16 Q Okay. Did you hear a lot of chatter like this?

17 A Yeah. There was a lot of chatter going around, different people saying, you  
18 know, that the National Guard or the police or authorities or somebody were going up  
19 there and just rounding people up, zip tying people behind their backs and stuff. And it  
20 kind of makes you go, okay, what's going on? Right?

21 Q Uh-huh.

22 A In this particular case, like I said, I don't know if he was quoting me or if he  
23 was trying to relay intel to me. I'm not sure. But, yeah, there was a lot of chatter like  
24 that.

25 Q Got it.

1 Well I was more asking about the second line: "Seems to be about that time to  
2 water a famous tree."

3 Did you hear a lot of people talking about that?

4 A Well, yeah. And that was in reference to, if they're in the National Guard, if  
5 D.C. Metro, everybody is out there just rounding patriots up, I mean, it's -- for what  
6 reason? There has been no crime committed yet. Right? You know, there's  
7 obviously a problem. Right?

8 And if that was the case, and which it needed to be confirmed, then he's  
9 absolutely right. You know, you have to consider at that point the tyranny is at  
10 100 percent. Right? You know, if you challenge anything anybody says, chart protests,  
11 like I said, remember, we said the peaceful options had been removed at that point is the  
12 way they're looking at that, interpreting that.

13 [REDACTED] Got it.

14 Well, why don't we take a break.

15 We'll go off the record at 12:37.

16 [Recess.]

17 [REDACTED] All right. We'll go back on the record at 12:47.

18 So, Mr. Wells, actually before I jump in, I think [REDACTED] might have had a couple  
19 of follow-ups based on the back and forth we just had.

20 The Witness. Sure.

21 BY [REDACTED]

22 Q Thank you, [REDACTED]

23 You noted, Mr. Wells, that you don't think it's patriotic to interfere with the  
24 peaceful transfer of power. What do you think about leaders who push their supporters  
25 to interfere with the peaceful transfer of power?

1           A    I mean, yeah, that's not patriotic either. I don't think protesting, though, is  
2 interfering. I don't see how that could be. I mean, I can kind of see if you get enough  
3 people down there and flood the streets and Congressmen can't get to work, then I get  
4 that.

5           But, I mean, it comes down to I think a gray area to where, you know, you have  
6 the right to protest, but then, you know, yes, there's also the Constitution setup for that  
7 peaceful transfer of power as well.

8           So, yeah, like I said, I'm a little conflicted on that one, to be quite honest with you.  
9 I don't really know which way to go on that without some more research. But, yeah, I  
10 don't think a leader should encourage people, hey, you know, start rioting or trying to  
11 disturb a congressional session in order to disrupt anything, including the peaceful  
12 transfer of power, yes.

13          Q    So I think I hear you and I think we can separate that into two buckets, so  
14 why don't I ask this.

15          Would it be patriotic for a leader to do as you said and encourage people to come  
16 to a protest with the goal of interfering with the peaceful transfer of power?

17          A    Yeah, absolutely not, I think that's illegal.

18          Q    Right. But would it be patriotic for a leader just to have a protest,  
19 encouraging some protest to a vote?

20          A    No, I think that should be illegal too to encourage, you know, people to  
21 disrupt a peaceful -- any sort of session of Congress, not just a peaceful transfer of power,  
22 but any session, I think that should be illegal.

23          Q    Okay. Thank you very much.

24          A    Uh-huh.

25          Q    And then I had a little separate topic.



1           So you mentioned remembering or remember hearing about President Trump's  
2           December 19th tweet where he said, you know, more or less, "There will be a protest on  
3           January 6th, be there, will be wild," and that you saw a lot of talk about this on social  
4           media or I think you might have said you heard about it in Zello chats.

5           Did you see people saying things like "President Trump has called us to  
6           Washington, D.C."?

7           A     I mean, yeah, vaguely. I mean, I think that language could have been -- was  
8           there, that he's asked us to come down and protest, yeah. I mean, yeah, I think I  
9           remember that language.

10          Q     Were you at all on Donald.win?

11          A     I remember visiting the site, yes. I do not recall whether or not I created an  
12          account. I would have to check. I don't think I did, but --

13          Q     If you remember visiting it after the December 19th tweet, did you see any  
14          posts about it there?

15          A     No, I don't think I visited Donald.win afterwards. I don't know if I visited  
16          it -- I remember visiting Donald.win. I was thinking it was supposed to be a social  
17          website, but if I recall correctly, it wasn't, or at least they didn't have it as a social website  
18          when I visited it, just basically an alternate Twitter platform for the President, you know,  
19          where he was getting word out after being banned on Twitter. That's what I recall it  
20          being. I could be wrong.

21          Q     Understood. So on the social media sites you were on, did you see people  
22          talking about going to war for President Trump and going to fight for President Trump?

23          A     I don't recall that.

24          Q     And they were specifically referencing January 6th and it being a big date  
25          that the President has called them to fight?

1           A    Well, I remember -- no.   And this was post January 6th, I recall seeing that  
2 language, not before or on.   It was after January 6th people saying, We need to go to  
3 war for Trump, we need to do this, do that.   But, I mean, like I said, they're -- no, not  
4 that, so I think they all knew it was bogus.   And like I said, you had QAnon and they were  
5 riling people up as well.   And like I said, you know I was trying to diffuse that.

6           Q    Right.

7           A    But I do specifically recall that after January 6th.

8           Q    Was that in reference to the January 20th inauguration of Joe Biden?

9           A    It could have been.   Yeah, it very well could have been.   It could have  
10 been some sort of that they were trying to disrupt that or something.   I don't know.

11          Q    Right.   So just to be clear for the record, for the December 19th tweet, you  
12 don't remember seeing posts about people going to fight on January 6th for President  
13 Trump?

14          A    I don't recall it.   I mean, if it was there, it's something I didn't even pay any  
15 attention to, to be honest with you.   I didn't give it any credit, credence, or anything.

16          Q    Did you see a Meme that was generated that had a purplish background and  
17 under the Capitol, it said, Occupy the Capitol, and it referenced Donald Trump's tweet on  
18 January 6th and it also said all 50 States --

19          A    I saw that.   And it was, like, well, this is going to be interesting.   If they do  
20 it like they did it in Portland, they're going to have, you know, one of those autonomous  
21 zones and everything else set up.   But, yeah, I remember seeing that, laughing about it.  
22 But that's how I interpreted it, yeah.

23          Q    I see.   I take it it was your impression that was Antifa or some other group  
24 post?

25          A    Right.   Right, that was my impression was somebody had set that up to

1 kind of be funny about it.

2 Q Right. But did you see that get reposted a lot, though, in militia groups or  
3 other group chats?

4 A Um, I don't recall. Like, mostly -- like I said, most of my activity was Zello.

5 Q Yeah.

6 A And if you read most of the things about voice in there, you know, it's just  
7 getting the comms out there. But you could post texts, but I don't -- I never paid  
8 attention to the text messages on Zello. It was just voice on these. If somebody  
9 started talking about it and drew attention to a text message, I would go back and read it.  
10 Otherwise, there's just so much there, I never paid attention. It was too much. It was  
11 too busy.

12 Q All right. Thank you.

13 I only have a couple more questions, and then I think I'm going to turn it over to  
14 Mr. Glick for a little follow-up.

15 Did you see posts after December 19th about caravans going to Washington, D.C.?

16 A Yes. I did see that, yeah.

17 Q And did those come up in the sense of, like, militia groups meeting up at  
18 certain points to get to Washington, D.C., for January 6th?

19 A That I don't recall. I remember one in particular that -- I remember this  
20 because it was funny. I just -- I died laughing. It showed somebody going to D.C. It  
21 showed them, like, crossing into, and they had a howitzer actually hooked up to the back  
22 of their truck. And I was thinking this is absolutely insane. Right? But that  
23 was -- that's what I recall. I remember the discussion online, but that one in particular I  
24 remember. The rest of it -- like I said, it was a Meme. It was heading to D.C. and it had  
25 a howitzer hooked up to the back of the truck, civilian truck, so, yeah.

1 Q Did you hear discussions about caravans on the Zello chats at all?

2 A Yes, we did. We heard caravans. I was told -- if I recall correctly, the  
3 caravans -- a lot of these caravans were a reference to people that we did not know.  
4 Like nobody in the patriot movement knew who they were, Three Percenters, that sort of  
5 thing, we didn't know who they were. And that was concerning. You know, we  
6 discussed that as being stuff that backed up our intel that it could have been rogue  
7 elements or Antifa or Black Lives Matter that was also heading up there en masse to try  
8 and rebel rouse or start some stuff.

9 Q So it was at least something that you all took seriously?

10 A Yeah.

11 Q More than just a Meme?

12 A Right.

13 Q Okay. Thank you.

14 Have you heard of a Twitter account named Dr. Enoch, E-n-o-c-h?

15 A No, sir, I have not heard of that.

16 Q That's fine.

17 Okay. [REDACTED] I'm sorry for keeping you waiting so long.

18 Thank you very much, Mr. Wells. That was very helpful.

19 BY [REDACTED]

20 Q Thank you, [REDACTED]

21 Thank you, Mr. Wells. I wanted to follow up on what you were talking with [REDACTED]  
22 [REDACTED] about the site Donald.win. Can you just circle back to explain more when the  
23 timeline when you were on the site was, clarify the timeline?

24 A Right. The timeline was, if I'm recalling correctly, Donald.win was put out  
25 there when he was deleted off of Twitter, at least that's when I was told about it because

1 he put out a tweet that said he was going to be on Donald.win now because Twitter -- not  
2 Twitter. I think it was Facebook or something, because Twitter deleted him or Facebook  
3 deleted him, one or the other, and he put out a tweet or thing on Facebook that said he's  
4 going to be on Donald.win.

5 So I remember bookmarking the site at that point, and I was, like, okay.

6 Q It may have been Reddit?

7 A It could have been. Yeah, it could have been.

8 Q Do you remember going to the donaldtrump Subreddit before he was  
9 banned?

10 A It's very likely I did, yes. I don't recall it, but it's very likely I did, yeah.

11 Q Sorry. I should clarify. This was actually the Subreddit r/TheDonald that  
12 was for Trump supporters.

13 A Right. I recall vaguely that Subreddit. It means I've been there, but I can't  
14 right this minute recall specifics, but yeah.

15 Q That's really helpful.

16 So then you were on the Donald.win site, would it be fair to say, in the election  
17 timeframe, throughout 2020?

18 A No. I specifically remember it was after -- it was when he was banned. So  
19 if it was before January 6th -- and I recall it being after, but if it was before that he got  
20 banned on one of those platforms, you know, he announced that he was going to be  
21 there, that's the point at which I visited it. So --

22 Q And it was your understanding that the Donald.win had posts from  
23 individuals close to President Trump or the President himself? That was how you --

24 A The President himself. I mean, that's what I recall. I remember it  
25 being -- almost looking like Twitter but just Donald Trump's posts, yeah.

1 Q Okay. And did you ever see information about the attack on the Capitol on  
2 Donald.win?

3 A Specifically I remember him saying -- and I don't even know if it was on  
4 Donald.win, but the specifics that I remember is that he said something about, I think,  
5 going home, or something like that, or something about National Guard. And that's  
6 vaguely what I can recall, and like I said, that's vague. I remember there being  
7 something about -- I don't know -- National Guard, going home, or something and  
8 then -- man, my memory, I'm getting too old.

9 Q That's all right.

10 A Right.

11 Q But you never saw posts by other individuals talking about their plans to go  
12 to D.C. on the 6th?

13 A Oh, no, I don't recall that at all. I don't recall that.

14 Q Okay. And what about Parler, were you ever --

15 A Yes, I was on Parler.

16 Q So this was Parler, not Donald.win, or it was both?

17 A It could have been. I mean --

18 Q Okay.

19 A -- I was on Parler, and if I recall correctly, it was on -- was it Dan Bongino who  
20 made that, who launched that platform? So I actually joined Parler because of Dan, so if  
21 that's the right one -- I'm pretty sure it's the right one, but I joined it because of Dan  
22 Bongino. I do follow him. He's an independent level, to a degree.

23 But, yeah, I joined it because, you know, he said he was making it because people  
24 were getting deleted and, you know, that sort of thing, patriots and stuff. So I joined  
25 that.

1           But I don't recall -- if I remember right, on Parler there was a lot of heated debates  
2 whether or not President Trump's account supposedly was real. You know, that's been  
3 a huge question on a lot of these new platforms. You'll see almost like 5 or 600 Donald  
4 Trump accounts, you know, like, okay, which one is the real one, yeah.

5           Q     Right. But you also joined Parler because you saw that patriots or other  
6 militia folks were being banned from platforms like Twitter? Is that --

7           A     It was myself, my wife -- yeah, they got my wife's account too. They got my  
8 mother's account. They got my brother's account. I mean, they got them all. I  
9 mean, it was absolutely insane. And so, yeah, we were definitely looking for another  
10 platform at that point, all of us were.

11          Q     That's really interesting.

12          All right. That's all I have right now, but thank you very much, Mr. Wells.

13          A     No problem.

14          Q     [REDACTED]

15          BY    [REDACTED]

16          Q     Thanks.

17                So I want to move to the period after January 6th, and you provided us with some  
18 records from before on your website, which we appreciate. But I would like to pull one  
19 of those up, and that's marked as exhibit 13.

20          A     Yes.

21          Q     All right. Yeah, so I wanted to ask you about this. This is a post from the  
22 forum. Correct?

23          A     Correct.

24          Q     And you're Pattoneer?

25          A     That's me, yes, sir.

1           Q    So on January 10, 2021, you posted this, quote: "Let it be known that after  
2 discussion and deliberation, we are no longer a defensive or constitutional militia, we are  
3 now a liberation militia under the authority of the Declaration of Independence."

4           A    Right.

5           Q    So what are these different kinds of militias, and what is a liberation militia?

6           A    Okay. A liberation militia is people who are trapped and need to get out of  
7 D.C., for instance. And that was a decision made based on the intel that, you know, we  
8 may have people still trapped in D.C. because of all of the lockdowns.

9                    So basically I made a decision at that point to take us to a state of liberation; that  
10 is, you know, getting people down there to get people out if they needed to get out.  
11 We also understand, you know, if a city like that is locked down for a period of time, it can  
12 create mass casualties inside the city, especially if food becomes scarce, that sort of thing.

13                   So that was definitely a concern of ours, and that was a decision that I made to  
14 switch the status over that. This also did carry two different folds to it as well. We saw  
15 that the lockdowns were kind of -- were unconstitutional. So that's where I also said,  
16 "That wherever any form of government becomes destructive of these ends," which is the  
17 inalienable right to life, liberty, and the pursuit of happiness, "it's the right of the people  
18 to alter or abolish it, and institute a new government."

19                   So, in that particular instance, you know, we were seeing these people being  
20 locked down, at least, again, intel we were getting, and we were definitely, you know,  
21 wanting to be making plans to go get them out of there. And, you know, if -- I mean, to  
22 honest with you, if we started seeing, okay, we're going to get resistance on that, we  
23 were prepared for that.

24                   But, again, our goal was to liberate people that were supposedly still trapped in  
25 D.C., from what we were hearing, by January 10th.



1 Q So did you know of specific people who were trapped in D.C.?

2 A We heard it in those channels, the Zello channels. It was pretty prevalent  
3 that there were patriots and such that were still trapped in D.C. and not letting leave.  
4 They had put up roadblocks, that sort of thing. People were told, I think one channel  
5 was stating that people were told to stay in their hotel rooms and they had put up cell  
6 phone signal blockers. So there was a lot of, I guess you could, say intel black holes.  
7 Right?

8 So, you know, there was things that we needed to learn too before we went off  
9 half cocked. I did understand that, that we had a lot more learning to do what's going  
10 on, which is why one of the plans we were putting up with is seeing, okay, if -- we're going  
11 to send people up there with ham radios, and you saw that earlier. That's one of our  
12 go-to devices as far as communicating back and forth over long distances is ham radio.  
13 Even if you've got cell blockers up, you're not stopping a ham radio, you know.

14 But, anyways, the plan was to send a couple of people up there as kind of scouts  
15 with a ham radio, report the situation back. If it is as bad as we thought it was, then,  
16 you know, we were going to take action.

17 Before we could even get anybody up there, we started hearing intel that it was  
18 not -- the situation was not as grave as what we were led to believe.

19 So at that -- I didn't rescind that or anything. We basically just sent it out on  
20 private channels: Hey, we're standing down for right now. So that's the story behind  
21 that post.

22 Q Got it.

23 So did you go up to D.C. to see what was going on?

24 A No, sir. I never went to D.C.

25 Q Okay. But members of Guardians of Liberty did?

1           A    No.  We got the intel that it wasn't as bad as what we were led to believe.  
2    I mean, it wasn't the Guardians.  It was the other Zello channel basically.  Somebody  
3    said, Look, it's not as bad as what so and so said it was, that sort of thing.  So that was  
4    the intel.  Basically we got intel and then we got counter intel.

5           So it was a matter of going, okay, we're just going to sit tight right quick until we  
6    get the full story.  Right?  Because like I said, even at that, we were not getting ready to  
7    plan on going up there, you know, loaded for bear, armed, all that kind of stuff.  Like I  
8    said, the smart thing to do is send somebody up there to actually scout and verify what's  
9    going on.  And I guess people could agree too that if, you know, you're holding an entire  
10   city hostage, something has to be done, you know, and that's the way I saw it.

11          But that particular post we found out was not as -- like I said, that post was made,  
12   and I found out probably, I would say, that morning or something -- I think it's the next  
13   morning, that it was not as bad as what people had led it to be believed.  People were  
14   supposedly there talking in Zello at that time and saying it wasn't that bad.

15          Q    So who were the people who were saying that it was bad and then who --

16          A    That I don't -- I can't recall the names that said it.  And if I gave you a  
17   name -- like I said, I couldn't even be even 20 percent certain.  Right?

18          Q    That's okay.  Do you know if they were from particular groups or --

19          A    Even at that --

20          Q    -- or from particular channels?

21          A    Yeah.  Even at that, I wouldn't be able to give you the particular group  
22   either because I would have to kind of know the names or associate the group, and that's  
23   if I remember the group they were in, you know.  Like I said, I remember the voices.  
24   Like, if I heard the voice, I could probably say, Yeah, that was him.  But, like, otherwise,  
25   that's the only thing I could be certain of there.

1 Q Sure. We were talking about a man named Eric Braden a little bit earlier,  
2 and he goes by General E or General Lee.

3 A General Lee.

4 Q Our understanding is that he was involved in planning to bring caravans of  
5 Three Percenters to D.C. after January 6th.

6 Were you in contact with him at that time?

7 A Yes, I was, yeah. I mean, it wasn't -- the contact wasn't like a personal  
8 contact or whatever. It was in the channel.

9 Q Uh-huh.

10 A So --

11 Q Do you remember what channel that was?

12 A It was an -- the channel, as far as I know, doesn't exist anymore, but it was in  
13 Little Miss Rogue's channel. I remember she had a little channel set up for everybody,  
14 close friends, people she trusted, that sort of thing. And I was accepted in that group,  
15 even though I don't know her name, but I was in that group.

16 He was also in that group, and I remember, you know -- I can remember vaguely  
17 maybe something about having people go into D.C. after -- it was after January 6th.

18 Q Uh-huh.

19 A It may have been because of the intel, the exact intel we got there. I don't  
20 know. It could have been. That very well could have been related.

21 Q Got it.

22 So you described what a liberation militia was. Do you mind just quickly  
23 describing what a defensive or constitutional militia is?

24 A Yeah. A defensive militia is one that defends against foreign invasion, that  
25 sort of thing. A constitutional militias is a militia that stands for the principle that

1 defends the Constitution against all enemies, foreign and domestic.

2 And, of course, the liberation militia, the way we have it classified in the orders of  
3 operation is a militia in which it sees that a group of people; namely, Americans that have  
4 been taken captive or living under tyranny, and we go in and evacuate.

5 Q Got it.

6 So the second quote, I recognize it as part of the Declaration of Independence.

7 A Right.

8 Q But I'm just curious, you know, in the year 2021 or 2022, what does it mean  
9 to, you know, alter or abolish government? What does that entail?

10 A Well, alter comes first, so be clear about that. It says alter is definitely first  
11 in that list, which means it has the highest priority. All right. And alter can be done  
12 under the -- could be done under Article V called the Convention of States clause. That's  
13 one way the people can alter the Constitution without Congress' really their approval.  
14 They're legally obligated to accept the application. The application is submitted by the  
15 many States. So alteration of the Constitution comes first. That is the first avenue.

16 The second avenue is to abolish it. And it's very clear what that means to me  
17 because it says very clearly there in the same capitalization, the right of the people, which  
18 the Second Amendment spells it out the same way. It says -- I mean, a well-regulated  
19 militia being necessary to the security of a free state. The right of the people to keep  
20 and bear arms shall not be infringed. It's the only words that match the Declaration of  
21 Independence and our Constitution precisely.

22 Q Got it. That's helpful.

23 So I would like to go to another document that you provided to us, and that's  
24 marked as exhibit 14.

25 And this is another post on your forum. Right?

1 A It is.

2 Q Who is Arnak, A-r-n-a-k?

3 A That -- I'm sorry for the formatting on that too.

4 Q That's okay.

5 A I would have to go check, but I don't know. I don't think I know him  
6 personally.

7 Q Okay.

8 A But I could check what group he's in and let you know if he's in North  
9 Carolina or not, but yeah.

10 Q Sure. And that would be great, and I can follow up with you afterwards.  
11 So Arnak wrote on January 11, 2021, quote: "Good afternoon. USMC vet here.  
12 I was at the Capitol for the rally."

13 A Oh, that's the guy that I sent you an email. I told you he joined after  
14 January 6th. Right? So he joined our group after January 6th, said he was at the  
15 Capitol riots. He posted maybe four or five other posts, and he ghosted us, like he was  
16 gone. It was almost like -- I don't even know what was up with that guy, but he  
17 wasn't -- like I said, he joined the website and then dropped that little morsel and then  
18 ghosted.

19 As far as I'm aware, he's the only one on our website that has admitted to being  
20 there, like outright said, "I was there." Right?

21 Q Got it.

22 I don't know what you're able to see on your end on the website, but if there is,  
23 like, an email address or any contact information associated with him --

24 A Do you want me to check right now?

25 Q -- can you send that to us?

1           A    Okay.  Yeah.

2           Q    Great.

3                    So after January 6th, was there any kind of impact of the events of January 6th on  
4 the group Guardians of Liberty?

5           A    I mean, I guess you could say people really lost steam because, I mean -- and  
6 it might be partially my fault because I told them they had to stand down, and people  
7 saw -- you know, QAnon really got people's spirits up.  I'll be honest with you, they really  
8 did.  That's one of the biggest culprits.  Like I say, I didn't -- I got a beef with QAnon.  I  
9 mean, whoever this new QAnon is, I've got a beef with them.  Right?  I've got a serious  
10 beef with the guy or group or whoever.  But they seriously got people's hopes up, I  
11 mean, to the point, you know, that you get people's hopes up and then all of a sudden,  
12 boom, it's a cliff.  And I know people sunk into somewhat of a depression.

13                   As far as me, I saw it coming.  The whole time I saw it coming.  I knew it was  
14 coming.  I kept telling people, you know, you need to prepare yourself for this because  
15 it's going to happen.  But, yeah, I saw activity drop.  This was definitely after the  
16 inauguration about Biden.  I saw activity drop.  I saw people who just basically, I mean,  
17 for lack of better words, didn't care anymore.

18           Q    Uh-huh.

19           A    You know, trying to use good language there.  But they -- the  
20 activity -- that's where pretty much -- you know, the activity and everything really  
21 dropped off because, like I said, people just kind of felt, I guess, a little hopeless there,  
22 especially after being elevated in that hope for so long and then just kind of being  
23 dropped instantly, so --

24           Q    Got it.

25                   And what does the group do today or nowadays?

1           A    I mean, right now, pretty much nothing. Every now and then I get together  
2 with a couple of -- I would just call them friends really. We might go shooting rifles or go  
3 hiking or something together, making sure we keep our physical activity up.

4           But, otherwise, it's not much we're doing that's fruitful anymore because, like I  
5 said, the activity is rather low.

6           Q    What about other, you know, groups that have historically been active, like  
7 other Three Percenter groups?

8           A    Well, since January 6th I don't really trust any of them. I really don't. Like  
9 I said, I protested people before January 6th, told them it's going to be a setup. I had a  
10 lot of people that was telling me that. Other groups told me that, and then they had  
11 members that went, got arrested.

12           And so, like I said, I don't trust them because, you know, if you put out the order  
13 to your members and they go anyways, something is wrong. Right? Like I said, we had  
14 two new members, the only two I suspected in my organization that had gone, that was  
15 there before January 6th. Right? And like I said, when I put that -- when I dropped  
16 that out there and said, Okay, now, nobody is going, I was pretty confident that nobody  
17 was going to go.

18           But these other groups, I mean, you're talking about groups even smaller than  
19 ours. Ours is supposed to be closer knit, you know. They're told -- they're given the  
20 same intel we were given. The leaders even said, Yeah, this is a bad idea. They tell  
21 their guys not to go, and they go anyways. So, like I said, I don't trust them. I  
22 absolutely don't trust these groups.

23           Q    And is it your sense that they're active or not active these days?

24           A    I know a couple of groups that are still active, at least a couple of friends that  
25 have -- they're still in their groups. They're fairly active. They're still training here and

1 there, but as far as my understanding goes, that all of them have dropped activity, I  
2 mean, every single one of them.

3 Q Got it.

4 Before I move on to some kind of housekeeping wrap-up questions, I want to see  
5 if any of my colleagues have questions and we can take the exhibit down.

6 [REDACTED]

7 BY [REDACTED]

8 Q Thank you, [REDACTED]

9 Mr. Wells, I wonder if you have thoughts on what the broader patriot movement  
10 is doing since the inauguration. And I know you've mentioned that a lot of your  
11 members were deflated, perhaps let down by QAnon. But what's your sense of  
12 every -- the broader landscape?

13 A Well, the broader landscape is, from what I'm understanding, they're getting  
14 politically involved now, which I think is the first time militias are really getting politically  
15 involved. You know, they're supporting certain candidates. You know, they're pushing  
16 those candidates. They're using the militias now to put up signs. You know, they're  
17 going out and getting signs for political candidates. You know, right, center,  
18 independents, you know, they're doing the campaigns and stuff. They're helping out on  
19 campaigns and stuff.

20 It's the first time that I've ever seen militia actually, you know, roll up their sleeves  
21 and get involved. And as far as my opinion goes, I don't think that's a good place.

22 Q Why don't you think that's a good place?

23 A Because militias are supposed to be neutral. You have to make sure you're  
24 neutral. You cannot say, you know, we, the people, unless you are.

25 Q Why do you think those militia groups are getting involved in electoral



1 politics at this point?

2 A Because they believe liberty is being eroded. I think -- well, I believe that as  
3 well. I'm not going to lie about that. I absolutely believe, you know, what we had as a  
4 basketball 10 years ago is a grain of rice today. Really, that's the way I feel. I feel like  
5 there's not much you can say anymore without being called racist or bigot, homophobe,  
6 or anything like that. There's not much you can say. I mean, just look like our  
7 neighbor in Canada, they can't even preach the Bible really anymore because if they say  
8 anything that's against homophobia or anything they see homophobic is now illegal.

9 There's a lot of things like that I'm seeing, kind of like I said, this ball of liberty that  
10 we had, this basketball is now a grain of rice. But they're getting involved because they  
11 don't -- I think they don't want to be bound, and I think the only way they can change is to  
12 organize themselves as a political tool which I think is dangerous.

13 Q What are some of the issues you see animating them? You mentioned  
14 homophobia, racism.

15 A Well, there's a lot. Like I said, I believe political correctness has been a tool  
16 used for a while to kind of softly infringe upon the First Amendment, and not just by  
17 government but by, you know, people of certain political spectrums.

18 I also believe that, you know, there has been infringements obviously made on the  
19 Second Amendment, which I get sometimes you have to be reasonable with that; but in  
20 my opinion, there always should have been avenues there. Like, you know, you've got  
21 the tax stamps, the FTA -- I'm sorry. I get my words confused, but you've got the tax  
22 stamps on firearms, which allows you to get, you know, pretty much a military grade  
23 weapon, but you have to go through background checks, you have to pay for the stamp,  
24 all that kind of stuff, very rigorous background checks.

25 You know, I can understand things like that, but there's some erosions that are

1 going on that I'm kind of -- it is concerning. Right? But I know too that I have to  
2 remain neutral and just watch, you know. People make their beds, and they have got to  
3 lay in it. That's the way I see it.

4 These other guys, they want to effect the change through a political means,  
5 getting involved politically, putting even somebody that's in the Three Percenter  
6 organization -- for example, I know this is going on -- actually putting them into politics.

7 I think in Florida they have somebody running for Congress that's a Three  
8 Percenter. They're doing this and, like I said, trying to effect politics. It's absolutely  
9 legal as far as everything I knew about it, but I think that it's dangerous.

10 Q Do you see this shift as related to some of the continuing claims that  
11 President Trump has made about the election being stolen from him?

12 A Oh, yeah, absolutely. Yeah, it's absolutely that that's the case. They want  
13 to put people in there that's going to lock down the elections to, you know, people that  
14 are -- you know, that they can verify are citizens. Right? And the thing is, I know a lot  
15 of these organizations, they don't care if you're White, Black, you know, Yellow, it doesn't  
16 matter, blue, red. They want you to present proof of citizenship before voting, which I  
17 kind of get it. There's a security method.

18 The way I see it is -- the way I suggested it is, you know, present ID when you go to  
19 register to vote. All right. And then, you know, sign a paper and have your signature  
20 there, and then you have to present that signature at the time you vote. In my opinion,  
21 I think that's fair, but, I mean -- yeah.

1

2 [1:21 p.m.]

3

BY [REDACTED]

4

Q Okay. So you mentioned the Three Percenters in that last comment. And

5

I'm recalling that we spoke about some members of the Three Percenter national chat

6

talking about targeting Democrats who were civilians. Are you concerned now that that

7

organization is seeking to get more involved in elections?

8

A Absolutely. It's terrifying.

9

Q Okay.

10

A That's why I said they should -- militias, I mean, they -- I don't think they

11

have any business in politics. Because, at the end of the day, the reason the militia

12

exists is for one of two -- well, in our case, three reasons, but that's, you know, serve the

13

community. The only other two reasons they exist, in my opinion and my interpretation

14

of the Constitution and what it says literally, is to defend against foreign invasion and to

15

defend against government tyranny, right?

16

And you can't be political, you know, basically say, well, I have a political

17

preference, and do that. You know what I mean? Because then you're putting

18

yourself -- I think somebody's putting their self in the position of power, which I think

19

that's automatically wrong.

20

Because say you have to -- you know, say it's a lot worse than it is today, right, and

21

you have to -- or all the militias are compelled at this point to do something. And that

22

day, we'll all know when it is, because I think a lot of politicians are going to resign too,

23

because they all take an oath, right, to the Constitution. And I think they'll feel

24

compelled to resign, on both sides of the aisle. We'll know when that day comes.

25

And what I'm saying is, when that day comes, you don't want to overturn a

1 government and install something that's much worse, like a dictatorship. Right? And  
2 that's one of my things, is, if I'm going to run an organization like this, you have to think  
3 ahead, think like one of the Founders. Right? So, you know, how is it that I don't  
4 become a dictator? How is it that my successor doesn't become a dictator, if that ever  
5 has to happen? And the answer to that is that, well, you can't take any power, for one.  
6 If something like that had to happen, you have to turn it back over to people.

7 So, yeah, I can see these -- these guys are getting really -- they are very terrified of  
8 voter fraud. They see it as a way of ushering in tyranny, which, like I said, I can  
9 reasonably understand that. And, of course, as we know, there's been cases reported, a  
10 lot of cases actually, at least, like, Arizona and such.

11 But the overall spectrum of this is, you know, what's done is done. What I've  
12 told people, what's done is done. You just have to, you know, bite the bullet on this,  
13 you know, lay down on that bed and wait 4 years, you know? Yeah, that's pretty much  
14 been my thinking.

15 Q On the note of 4 years, are you concerned about what the militias might do  
16 if President Trump runs again?

17 A Well, I hope they learned a lesson on January 6th, honestly. Whoever was  
18 involved in that, or anybody watching, I hope they learned the lesson on that.

19 No, my biggest concern would be -- I don't think Trump should run, first of all. I  
20 think they said he's having health issues or something, but I don't think he'll run.

21 My biggest concern would be, is them seeing fraud again -- it doesn't matter who  
22 the candidate is -- and basically say, okay, enough is enough, you know. That would be  
23 my biggest thing -- that would be my biggest fear.

24 Q And if they saw or were told of evidence of fraud again, your fear is that they  
25 would act against the government in a potentially violent way?

1           A    Or act against precincts, voting precincts that seemed to be fraudulent, right,  
2   that they assumed to be fraudulent.   That could definitely be a -- yeah.

3           Q    And do you think that might have a -- going back to the conversation with  
4   the Three Percenters -- a, sort of, potential for targeting of particular political affiliations,  
5   ideologies --

6           A    Right.

7           Q    -- even -- okay.

8           A    Right.   It definitely leads to all that, yeah.   It could be a nightmare  
9   scenario.

10          Q    Are you concerned about that for the elections later this year?

11          A    No, I'm not.   I'm not as concerned about that.   Honestly, I don't know if  
12   too many people actually care about the midterms.   I seem to be the only one in my  
13   area that actually cares about midterms, so -- yeah.

14          Q    Well, I just have one more question, and then I'll hand it back to  
15   Mr. Prasanna.   This has been very interesting.

16                What do you think we as a society should be doing to avoid that potential for  
17   potentially sectarian violence?

18          A    I'm glad you asked.   I am.

19                So, to avoid stuff like this from happening, I think one of the biggest things that we  
20   need to do as a country, and politicians, we need to stop putting people in boxes, saying  
21   Trump supporters, militia, patriots, whatever else -- Biden supporters.   Doesn't matter.  
22   Stop putting them in boxes.   Stop giving them classifications.   And just say, we're all in  
23   the same boat here.   Right?   I think that's how it stops.

24                Because I know a lot of people got very angry, especially, like, after  
25   January 6th -- and they were getting angry before; don't get me wrong.   So this is, like, a

1 boil that's been festering for a while, where, you know, the people in the militias and  
2 people with family in militias and that sort of thing were getting quite upset that, you  
3 know, they were being called certain names -- White supremacists. "Why? Why are  
4 we being called White supremacists?" Because -- I mean, it was bogus reasons, you  
5 know. Very not White supremacist reasons. You know, "Well, you've got White  
6 privilege." And then they'll throw, "You don't recognize it; therefore, you're a White  
7 supremacist."

8 And, by the way, I'm a quarter Cuban. So, I mean, I can officially claim to be  
9 Latino.

10 But people were getting upset over that. And it was something that was  
11 ongoing, and a lot of people saw it as kind of a final straw during this whole January 6th  
12 thing, is that, you know, they turn around and said, well, it was Trump supporters, Trump  
13 supporters this -- and like I said, even I got angry at that, but it's not enough to do  
14 anything.

15 But, I mean, in my opinion, we fix this by making sure everybody -- that we don't  
16 segment anybody from the society. That's my opinion.

17 Q That's really insightful. Thank you.

18 I'll hand it back to [REDACTED]

19 [REDACTED] Thanks.

20 BY [REDACTED]

21 Q I know I said half an hour. We're a little bit over that, but the finish line is  
22 in sight.

23 So I just wanted to do a couple of housekeeping things and tie up loose ends.

24 [REDACTED] can we pull up exhibit 11, please, and go to page 6?

25 And, Mr. Wells, this is -- well, once we pull it up, I'll explain.

1           So this is a post from March 26, 2022.

2           A    Uh-huh.

3           Q    And I just wanted to ask about something that wasn't clear to me.

4           So page 6 -- down, please.  Down, please.  Right there is good.

5           So you wrote, "I know what you are after and believe me when I say this -- I wrote  
6 it.  Me.  Myself.  I wrote it.  And I plan on delivering that to you with the full headers  
7 to show I did write it and will testify under oath that I did write it."

8           I wasn't sure what you were referring to.

9           A    Well, that was me making the "we" post.  And I even did it on the forums.  
10 I sent you back to me saying "we" and "us."  What I'm referring to is the January 6th  
11 stuff.

12          Q    Got it.

13          A    That's what I'm referring to there, that I wrote that.  I figured that's what  
14 you guys were targeting.  Because, I mean, the way I saw it, it was kind of like, you  
15 know, pretty much the only thing that would be saying -- "we" would be the only thing  
16 that suggests I was there.

17          Q    Got it.

18          A    So my assumption was at the time that, you know, you guys had that post  
19 and that I would testify under oath that I did write it, that was me, you know, and that I  
20 have no quorums -- you know, qualms with doing that.

21               And, of course, like I said, it went on to kind of testify there that he was, you  
22 know, accusing me of being there without, like, pulling phone records and stuff like that.  
23 It was rather moronic, because, you know, I wasn't.  And -- yeah.

24               Like I said, that's pretty much what that entire thing there is.  And, of course, you  
25 know, basically being at church, that sort of thing.

1 Q Got it. Great. Thank you for clarifying that.

2 We can take that down.

3 And, then, so we understand that you recently set up a new communications  
4 server for Guardians of Liberty. And you mentioned that three other patriot  
5 organizations were also using that network, including AFS.

6 What is AFS?

7 A The American First -- something. I don't know the last one.

8 Q The American First what?

9 A Something. I don't know the last acronym on that.

10 Q Does the S stand for something?

11 A It doesn't stand for "something." It -- yeah, okay, now we're getting  
12 ambiguous.

13 I can't remember what the last letter stands for. It's "America First" and  
14 something else. But they're also members of, like, the Black Robed Regiment. It's a  
15 religious organization. So they're a patriot organization but also a religious organization.

16 Q Got it.

17 And do you know the names of the other two patriot organizations?

18 A Yeah, it would be the Black Robed Regiment. So you got them, the AFS.  
19 And there are two other organizations that's currently trying to court me on it. I don't  
20 know if I trust them enough to let them on it. I mean, if they want my company to host  
21 it for them, we're happy to do that, you know. But, you know, putting them on our  
22 server --

23 Q Got it.

24 A -- I'm not so sure.

25 Q And the Black Robed Regiment, is that Steve Klein's group?



1           A    I have to check, but that sounds -- yeah, I think so.

2           Q    Great.   What do you know about them?

3           A    I know it also goes back to the American Revolution, when the pastors came  
4 together to organize the militias against the British.

5                   And they exist today kind of under the same thing, that, you know, if there needed  
6 to be a revolution or a defense or whatever, it would be the pastors.   They come  
7 together in this Black Robed Regiment to organize people, militias and whatever else,  
8 against whatever force that we had.

9                   The other thing is, too, on that -- which I really do support this part -- is they  
10 basically -- I guess you could say that they're very biblically driven.   They recognize the  
11 authority of the civil government, which is -- that's a good thing in and of itself, but they  
12 also recognize the authority of the civil government is granted by the people.

13                   And the one thing I found striking about the organization is that it was actually, I  
14 think, French, I think -- I can't remember if it was French or English at the time.   One of  
15 the world leaders over there said that, if we had the Black Robed Regiment, we could win  
16 any war we wanted to, because they turned, I guess you'd say, revolution into religion.  
17 And it was a very influential ordeal and organization, extremely influential.

18           Q    Got it.   And, to your knowledge, were they in D.C. on January 6th?

19           A    No.   To my knowledge, they weren't, no.

20           Q    Got it.   And AFS, were they?

21           A    No.   To my knowledge, they weren't.

22           Q    Great.

23           A    AFS usually stays out of stuff like that.   Their thing is, if you go and look  
24 at -- I'm actually hosting their site, one of their sites.   If you go on there and look, they're  
25 pretty well -- they're pretty well-grounded people.   They're -- it's a community-type

1 organization, kind of like ours. They're more focused on the community than they are  
2 training with firearms and stuff like that. You know what I mean?

3 Q Uh-huh.

4 A So there's no -- I wouldn't even say they have a militia component, really.  
5 But they could be, you know. They could very well easily do that, especially if most of  
6 them know how to use firearms.

7 Q Got it.

8 And I wanted to ask, because it sounds like America First is part of the  
9 name -- there's another group that's run by Nick Fuentes. I don't know if you've heard  
10 of him. He runs a group called America First, and he has a political action conference  
11 that some politicians go to.

12 Do you know if there's a connection there, or is it just a coincidence?

13 A I know both organizations are extremely big. That is, the Black Robed  
14 Regiment and the America First -- whatever that last letter was -- both organizations are  
15 huge. So it's very possible they're linked.

16 Q Got it. Fair enough.

17 And we've heard in reporting that there's a document circulating called "1776  
18 Returns." Have you ever heard of that document or seen it?

19 A I can't recall. That sounds interesting. If you've got it, send it over. I'll  
20 read it.

21 Q Well, do you mind, you know, just seeing if you might have gotten it at some  
22 point?

23 A Would it be email?

24 Q I don't know. We've just seen in reporting that this document had been  
25 circulated by some of the people who were at January 6th. And it's called "1776

1 Returns."

2 A It's not in Gmail -- well, hold on a minute. Nope, that's not it. Nope.

3 I'll check the other email. The only other place it would be is in Guardians of  
4 Liberty, and I don't think it's here.

5 No, sir. I can say negative for that. I'm not seeing it in any of my search results.

6 Q Okay. That's okay.

7 A Yep.

8 Q And then I have to ask, because of one of our email exchanges, whether any  
9 content was deleted from the Guardians of Liberty website on or after March 25th.

10 A Related content, no.

11 So I will explain what was deleted and changed.

12 You had one guy -- when I put that information out, I already told everybody,  
13 don't mess with anything on the site, but I'm just going to let everybody know what's  
14 going on.

15 And, of course, you can't -- you can't really do it anyways. You can't delete  
16 anything from the website, because it keeps an active log, a revisional log of what's going  
17 on. So, if somebody deleted something, we'd just roll it back.

18 But we did have one user who went up there and changed his name to Joe Biden  
19 for you guys. So I -- he is -- he has nothing to do with January 6th, I assure you. He's  
20 from Norway. He hasn't left Norway. Well, he actually just left and went to Sweden,  
21 but he hasn't left the European continent. So he definitely had -- not there and didn't  
22 have any involvement in it.

23 But he was on the website to learn, because is protesting COVID in his nation, and  
24 he was trying to learn from us, you know, how these grassroots organizations start, that  
25 sort of thing. And he started it off in Norway. So it's quite a -- quite a significant thing.

1 So he's just kind of there as an observer.

2 Q Got it. So you deleted his content?

3 A No. No, he changed his name. It was --

4 Q Oh, okay.

5 A -- no change of content. He just changed his name.

6 Q Got it. So that was the only content that was changed?

7 A Yeah, far as I'm aware. But, like I said, even if -- if you guys notice anything  
8 else that was removed by any means, like, anything from public, let me know, and I can  
9 give you the rollback.

10 So, I mean, there's -- pretty much everything you got is everything that I  
11 remember having. And I don't recall anybody else saying anything that would be, I  
12 think, relevant to this.

13 And, like I said, anything that was deleted -- like, we had chat conversations.  
14 Like, I went and I tried to log into the website -- and, of course, the chat there is kind of  
15 public too. I went to log into the website, the plug-in that's required for the chat,  
16 whatever, it was, like, almost 6 or 7 months out of date. And when I went to upgrade it,  
17 it popped the database. Like, it was gone. And the website wasn't moving. And you  
18 guys probably noticed this too. The website was moving really, really, really slow, right?  
19 And that's because of all these plug-ins I had to update.

20 And that could be -- you asked me to get the information. I was going there  
21 trying to get information. I was like, this site's not moving; it's going to take me days or  
22 years to get this stuff.

23 So I basically updated everything, and when it did, it popped that table out of  
24 the -- out of that.

25 So the chat is the only thing, I think, that's not there, but it was publicly available.

1 There was, like, no conversation about January 6th in that, because we put that chat  
2 system on the website, I think, after January 6th.

3 Q Got it. That's really helpful. Thank you for clarifying that.

4 One more question. Are you familiar with the Constitutional Sheriffs and Peace  
5 Officers Association?

6 A Yes.

7 Q Do you have an affiliation with them? Have you worked with them?

8 A I think I have donated to them.

9 Q Got it. Anything beyond that?

10 A No, sir.

11 Q Okay. Great.

12 So, since we talked about Zello a couple times, I just want to -- I have a list of chat  
13 channels that were possibly being used around January 6th. And I just wanted to go  
14 through the list and see if any of these rang a bell, if you knew that they were active on  
15 January 5th and 6th and, kind of, what chatter was going on.

16 A Okay.

17 Q We've talked about Real Patriots a couple of times, and I think you said that  
18 A.J. Andrews was the leader of that channel?

19 A Yes, sir, as far as I recall. Yes, sir.

20 Q There's also Real Patriots III% and then Real Patriots with just a comma after  
21 it, but I think these are separate channels.

22 A I think those may have been the channels that were, like, backups  
23 or -- because I think, if you look at them, I think A.J. was the leader in some of those.

24 Q Okay.

25 A Yeah. I think, like, the Real Patriots comma, I think, was one of A.J.'s

1 backup accounts. So, basically, they popped Real Patriots and created that one.  
2 People started joining that one. Then they popped that one, and then they made  
3 Underwater Basket Weaving.

4 That's why I said it started getting ridiculous. The names started getting really  
5 ridiculous and laughable. They were like, Underwater Basket Weaving. I just died  
6 laughing. It was a military thing. You know, as long as you got your degree in  
7 underwater basket weaving, you can become an officer, sort of thing, you know.

8 Q Right.

9 A Yeah.

10 Q Southern Patriot Council?

11 A That one I don't recall.

12 Q SPC?

13 I think we mentioned this --

14 A SPC sounds familiar.

15 Q -- a little earlier --

16 A That one sounds familiar.

17 Q -- General E?

18 A Yeah, I don't recall if I was in that one, but that does sound familiar. If I was  
19 in that channel, I don't think it was that long. Yeah, it just doesn't stand out.

20 Q Got it.

21 Defendj20?

22 A No. That one I don't recall.

23 Q The Last Stand?

24 A No.

25 Q This looks like it might be a Michigan-specific one, but I'll ask anyway.

1 Patriot DC Coordinate WTP/ALL MI?

2 A No.

3 Q And for the reporter's benefit, I'll get them a list of these after so they can  
4 transcribe accordingly.

5 DC Protest January 6th?

6 A No.

7 Q March for Trump Rally?

8 A I may have been in that one, yeah. That sounds familiar.

9 Q And was that something that was before January 6th --

10 A I think so, yes.

11 Q -- at one of the earlier events, or --

12 A Yeah.

13 Q Okay.

14 A I think that was before January 6th, yeah.

15 Q Do you remember if it was, like -- there were two other D.C. rallies, one in  
16 November and one in December. Do you happen to remember?

17 A I can't recall off the top of my head, but I know that -- I know -- I remember a  
18 D.C. March -- or a March for Trump Zello channel.

19 Q Great.

20 MAGAStopTheSteal?

21 A I don't recall being in that one, but that sounds oddly familiar. Do they  
22 have a Facebook account? If it was a Facebook group, I was probably in that.

23 Q Okay.

24 A Yeah.

25 Q 2020 Hunt?

1 A What? Say it again.

2 Q 2020 Hunt.

3 A "Hunt" as in h-u-n-t?

4 Q Yes.

5 A No. Oh, no.

6 Q And then I think there were two networks that had a couple of channels in  
7 them. One was III% Defense Militia, and the other was National III% Patriots Coalition.

8 A I know both of those, yes.

9 Q Okay.

10 A The National III% Patriots Coalition, that is, I think, A.J.'s group.

11 Q Got it. And that's where you were spending most of your time?

12 A Oh, no. I mean, I was in his Real Patriots group, but I think it was that  
13 somebody -- he'd sent an ambassador -- like I said, I can't even remember all those  
14 names, man; there are so many of them. But, no, it was one of his guys that came over  
15 to us as an ambassador for that, that got us involved into the Real Patriots Zello channel.  
16 You see? That's kind of how it reaches out. You network.

17 Q Yeah. Okay.

18 Well, I just want to wrap up with -- you mentioned at the top that the FBI had  
19 come to talk to you. Was that the only time you've been contacted by law enforcement  
20 after January 6th?

21 A Yes. And I basically -- they asked me about some of the posts you asked  
22 me about, and I told them how that context was used.

23 There was one other post they took issue with, that, you know, I was just talking  
24 to somebody in chat on Facebook, and basically they had said something about, the ATF  
25 just stormed inside the house and tried to confiscate firearms. And I said, well -- I don't



1 know if you guys want to me to quote this, but I said -- I said, I wish an MF'er would, I  
2 said, because it would be Waco 2.0 in my house.

3 And the FBI did not like that at all. I mean, I understand, I get it, but I wasn't  
4 talking about the FBI in that chat message; I was talking about the ATF. But I get their  
5 offense with Waco.

6 Q Uh-huh.

7 A But otherwise they told me I could go. They left.

8 But, yeah, it was -- like I said, the same question was what was posted on the  
9 website there. And that seemed to be the biggest thing they had an issue with.

10 Q Got it.

11 Well, before I wrap up, I want to see if any of my colleagues have questions they'd  
12 like to get?

13 Okay.

14 So, Mr. Wells, thank you so much for spending time with us today, for answering  
15 our questions.

16 Is there anything that we didn't ask that you think is relevant?

17 A No. I think -- like I said, I just hope that you guys get to this, I mean, figure  
18 out who caused it. Again, I don't -- I think pointing at the obvious is not the -- not  
19 always the obvious -- not always the correct answer.

20 I do applaud you guys for trying to get to the bottom of it, but I would -- I would  
21 hope that there was no political motivations in the investigation. I know it's hard  
22 to -- you know, it's hard for me to fathom that is possible, but, you know, I would hope  
23 there's not, and hope that you guys can figure out, you know, who did this, who  
24 motivated it, and, you know, basically prevent it in the future in a way that is  
25 wholesome -- you know what I mean? -- inclusive, let's people know, hey, we're not

1 excluding you, we're not taking away your rights, we want to help heal the divide.

2 That's what I'm hoping.

3 Mr. [REDACTED] Well, I appreciate that.

4 And you've been very helpful today. We appreciate that you've been open with  
5 your answers.

6 And you've sent us a bunch of documents already, which we really appreciate.

7 And I know there are a couple of things that we referenced during this call that we'd like  
8 to follow up on, so I will follow up with you on that.

9 And just because there is this followup that we'd like to finish, rather than  
10 concluding the deposition today, we're going to just put it into recess. That means that  
11 we're done for today. It's unlikely that we'll ask you to come back, but just for the sake  
12 of wrapping up with the documents, we'll go into recess today.

13 And I saw [REDACTED] came on video.

14 Do you have a question, [REDACTED]

15 [REDACTED] No. I just want to say thank you.

16 The Witness. Thank you, sir.

17 [REDACTED] All right.

18 Well, Mr. Wells, thank you, and we will go off the record and into recess at

19 1:48 p.m.

20 [Whereupon, at 1:48 p.m., the deposition was recessed, subject to the call of the  
21 chair.]

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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.

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Witness Name

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Date