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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 INTERVIEW OF: ALEXANDRA PREATE

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15 Tuesday, April 5, 2022

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17 Washington, D.C.

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20 The interview in the above matter was held via Webex, commencing at 10:00 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:

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8 [REDACTED] SENIOR ADMINISTRATIVE ASSISTANT

9 [REDACTED], SENIOR INVESTIGATIVE COUNSEL

10 [REDACTED] SENIOR COUNSELOR TO THE VICE CHAIR

11 [REDACTED] CHIEF CLERK

12 [REDACTED] SENIOR TECHNICAL ADVISOR

13 [REDACTED], INVESTIGATIVE COUNSEL

14

15 For ALEXANDRA PREATE:

16

17 JOSEPH JAY

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2 Mr. [REDACTED] So let's go ahead and go on the record, on-time departure, 10:00.

3 Good morning, Ms. Preate. Thank you so much for being here today. My name
4 is [REDACTED], and I'm a senior investigative counsel with the January 6th Select
5 Committee. [REDACTED] is also with us.

6 And I think -- I don't want you to take any offense, but when -- I think when [REDACTED]
7 and I are both going to be questioning you, and when we're not, when one or the other is
8 questioning, I think we'll probably go off camera -- the other will go off camera.

9 Sometimes we have --

10 Ms. Preate. Okay.

11 Mr. [REDACTED] -- some bandwidth issues --

12 Ms. Preate. No worries.

13 Mr. [REDACTED] - if we have too many video feeds. So --

14 Ms. Preate. That's okay.

15 Mr. [REDACTED] -- if we're not on camera, we're still paying attention and following
16 along, just not on video.

17 Ms. Preate. That's all right.

18 Mr. [REDACTED] So this is a voluntary interview of Alexandra Preate, conducted by
19 the House Select Committee to investigate the January 6th attack on the U.S. Capitol,
20 pursuant to House Resolution 503.

21 Ma'am, can you state your full name and spell your last name for the record?

22 Ms. Preate. Alexandra Preate, P-r-e-a-t-e.

23 Mr. [REDACTED] This is going to be a staff-led interview. There may be Members of
24 the Select Committee that join from time to time, and I'm going to try and keep my eye
25 on the participant list, and announce their arrival to the interview if they come in.

1 I may miss it, or I may not be able to track it directly, but Members may be coming
2 in and out, and they may also ask questions during the course of the interview.

3 Ms. Preate. Okay.

4 Mr. [REDACTED] As I said, I'm a senior investigative counsel. [REDACTED]
5 investigative counsel, is also with us. And [REDACTED] from our staff is not on
6 camera, but he's assisting us here today. I can see the chief clerk, [REDACTED] is also
7 present, as is [REDACTED], who's a member of the staff.

8 There's an official reporter who's transcribing this interview, so we're going to
9 have to do our best to not talk over one another. I will do my best to make sure that
10 you've finished your answer before I ask the next question.

11 And if you could do the same, let me finish the question, even if you know where
12 I'm headed with it --

13 Ms. Preate. Okay.

14 Mr. [REDACTED] -- and then take a pause, and then you can answer.

15 Because we have a stenographer taking down the testimony, they are not able to
16 transcribe nonverbal responses. So shaking your head, nodding your head, things like
17 that --

18 Ms. Preate. Okay.

19 Mr. [REDACTED] -- won't show through on the transcript. So just make sure you give
20 an audible, verbal response.

21 Ms. Preate. Got it.

22 Mr. [REDACTED] We're going to ask that you answer questions to the best of your
23 recollection. Some of this, the issues we're going to be talking about, go back a year or
24 more, or probably more than a year. So we understand that, you know, your
25 recollection may not be as fresh as it was at the time. We'll do our best to refresh that

1 recollection.

2 Ms. Preate. Okay.

3 Mr. [REDACTED] But if you don't recall something, that's perfectly fine -- a perfectly
4 fine answer. If you need clarification of a question, just let us know and we'll do our
5 best to clarify so that the question is clear and we know that you're answering the
6 question that we're trying to ask and we're not just sort of passing each other in the
7 night.

8 Ms. Preate. Okay.

9 Mr. [REDACTED] If you need to consult with Joe at any point during the interview, just
10 let us know. We can take breaks, we can either just -- well, I don't know how we'll
11 do -- we'll just all mute our cameras and video, and we'll find a way. Or if we need to
12 take a longer break for you guys to sort of go offline and chat, we can accommodate that
13 as well. So just let us know what we need to do in that regard, or if you just need a
14 personal break, for a few minutes, just let us know and we'll take a break.

15 Ms. Preate. Okay. Thank you.

16 Mr. [REDACTED] Now, you're not under oath today. This is a voluntary interview.

17 Ms. Preate. Okay.

18 Mr. [REDACTED] But I do want to mention -- and I don't want you to read anything
19 into this. We say the same thing to all witnesses -- that you still -- it is unlawful to
20 deliberately make a false statement or provide false information to Congress and in
21 connection with this congressional investigation.

22 So even though there's no oath, you're expected to tell the truth here, and if you
23 don't, there could be consequences for that. Do you understand that?

24 Ms. Preate. Absolutely.

25 Mr. [REDACTED] Any questions about any of what I've said before we start?

1 Ms. Preate. No.

2 EXAMINATION

3 BY MR. [REDACTED]

4 Q Okay. Why don't we start with, Ms. Preate, can you just give me a short
5 educational background, where you went to school, how far in school you went?

6 A Yes. I went to Scranton Preparatory School for high school in Scranton,
7 Pennsylvania. And then went to Villanova University, and that's the -- I don't have a
8 graduate degree.

9 Q Okay. Well, we have something in common then. Both of our schools
10 lost in the semifinal game on Saturday. So --

11 A Yes.

12 Q -- I feel your pain.

13 A Exactly. Quite embarrassing on our -- on our part, but Villanova, not too
14 good. But anyway, they tried.

15 Q Tell me a little bit about your professional experience. What have you
16 been doing since graduating from Villanova?

17 A I've basically been doing events and PR and that sort of thing most of my life.
18 I worked on the Hill a little while for Rick Santorum, and then -- not taking through every
19 moment of my life, but I thought that would be -- because I've been on the Hill before, for
20 a short time. I did work for Ambassador Faith Whittlesey who ran on a foundation in
21 New York City.

22 And then once I moved there, I lived there basically until the COVID and have
23 done events and PR and that sort of world.

24 Q And is that what you're still doing now?

25 A Yes.

1 Q Do you have your own PR firm?

2 A Yes. I mean, not so many events obviously since the COVID, but when we
3 can, yes.

4 Q And do you have a company?

5 A Yes. It's called Capital HQ.

6 Q How long have you been involved with Capital HQ?

7 A Quite a while. I forget exactly what year we started, but many years ago.

8 Q More than 10?

9 A I think so.

10 Q Okay.

11 A I haven't thought about it in a while. I'm sorry about that.

12 Q No, no, that's okay.

13 A It's basically -- it's basically me.

14 Q Any employees?

15 A No. Just I have some consultants but -- on projects, but it's basically me.

16 Q Is Rebecca Karabus an employee, or has she ever been an employee at
17 Capital HQ?

18 A She -- we did work together. She no longer works with me, but she did.
19 And I think she was always a consultant, not a -- she worked on different projects, and
20 she worked for me during the summers from when she was in college.

21 Q Okay. But for the most part, it's a one-woman operation?

22 A Yeah. I mean, I've had subcontractors, but it's -- it's changed a little bit
23 throughout the years. I've had more people working for me, and then some not
24 working. We've had some employees, some consultants. But right now, and for
25 before the COVID, I had just basically consultants.

1 Q Got it. So my understanding is that one of our colleagues sent Mr. Jay a
2 request for documents or information that might be helpful to the investigation. And I
3 know you pulled some documents together.

4 A Yes.

5 Q Can you just describe for me generally what you did and how you found
6 documents that were responsive to our request?

7 A So what -- we tried to image my phone twice, and it failed. So then I hired
8 a private investigator who's -- does electronic issues, and so I kind of made a grid of the
9 names that you were asking, and then even names that I knew that might -- that you
10 didn't ask for that I thought might be relevant. And then kind of took the dates that you
11 said and then took the topics, and so I kind of just tried to go back and pull them that
12 way, because I had to do it all by hand. So it's kind of -- I just kind of made a grid that
13 way.

14 Q And were you mostly looking for text messages?

15 A I tried to do everything. So I did -- I don't have my notebook in front of me,
16 but I did, like, text message, WhatsApp, Signal, email. I tried to do phone, but that's not
17 really -- it's not -- I couldn't figure out how to do that, so.

18 And the private investigator tried to help me kind of search the phone, because
19 you have to go back so far, and sometimes it glitches and it shuts off, and then you have
20 to go back and try and do it again.

21 So that was the process of which I worked on it. So I hope it's -- I hope it's
22 helpful.

23 Q Yes. It certainly is helpful, and we appreciate the documents, and we're
24 going to talk about some of them today. I did want to sort of understand if there might
25 be gaps in what you were able to access. For example, I don't think we saw any

1 WhatsApp or Signal documents. Did you not find any? Were you not able to access
2 them?

3 A There are some.

4 Q Okay.

5 A There are WhatsApp there.

6 Q Okay. And maybe as we go through, maybe we'll see some of those, and
7 you can point those out to us.

8 A Okay. And I think there's a couple Signal. I use mainly text message --

9 Q Okay.

10 A -- regular text message. So I think that's why it's more of that than others.

11 Q Do you know, of the names that you were searching for, did any of those
12 names sort of jump out at you as folks that you recall using Signal?

13 A Not really. Just whatever I pulled for you. Again, I usually, I mainly use
14 text message.

15 Q For example, does Mr. Bannon use Signal as far as you know?

16 A I think we has, and may and I'm -- I'm not really sure what he does all day.
17 I'm not --

18 Q Yeah.

19 A My -- yeah.

20 Q Well, but I know that there's certain people who say, who we've sort of seen
21 in the course of this investigation who are only communicating on Signal. So they have
22 to tell people, Hey, use my Signal, don't use -- you know, text message me, or don't
23 iMessage me. Do you recall if any of the folks that we've asked you about have given
24 you similar instructions, so that you know that that's the preferred messaging app for
25 them?

1 A I don't know what -- I mean, I'm not sure what their preferred messaging
2 apps are, like, in general, I don't know, so -- I have communicated with some people on
3 Signal and WhatsApp and text message at the same time.

4 So I did my best to search the phone, and as I said, I kind of put a grid down of
5 each one of the -- one of those things and then searched kind of words that you asked for
6 and names that you asked for. And then just kind of names that were in the news that
7 you didn't ask for, that I thought maybe you might -- it might be connected. So that's
8 kind of the way I did it.

9 Q Great. Great. Okay. Putting aside sort of the document search that you
10 did, but I'm sort of interested in the Signal, WhatsApp sort of issue. Do you recall -- and
11 I know you said you don't know how Mr. Bannon communicates generally, but do you
12 recall him ever telling you, for this particular discussion, let's have it on Signal, or let's
13 have it on WhatsApp?

14 A He may have, but his main -- I mean, I mainly do text messaging with him.
15 He may have said that, but we mainly, like, the vast majority of -- vast, vast majority are
16 text message.

17 Q Okay.

18 A We have texted on WhatsApp, I believe. I think I found some, I think,
19 maybe on Signal, maybe, but the vast majority that I do with him are on regular text.

20 Q Okay.

21 A And not many emails either. Really just regular texts.

22 Q Are you still working with Mr. Bannon?

23 A Yes and no. I found out that [REDACTED]

24 Q I'm sorry.

25 A So I'm taking a little bit of a -- just a little bit of a break and figuring out

1 what -- we're trying to figure out [REDACTED] and stuff, so.

2 Q Yeah, okay. Well, good luck with that.

3 A Thank you.

4 Q And you're in Pennsylvania now?

5 A Well, I flew to Florida for a client, and then I got stuck here. I don't know if
6 you saw, there was all these storms, and my flight got cancelled. So I was going to go
7 back, but I didn't want to have any issues with making this 10:00, because [REDACTED] has been
8 so nice with Joe to try and find a date. So I'm still here, and I'm going to go back after
9 this call.

10 Q Okay. Well, thank you for making the time, particularly in this difficult time
11 for you and your family.

12 A Thank you.

13 Q So you're on a break for personal reasons, but generally, you're still working
14 with Mr. Bannon, or you intend to go back to working for him?

15 A You know, I -- right now, I just -- I want to -- yeah, I don't want to abandon a
16 client, so we communicate a little bit. But I'm really -- not really doing as much as I
17 would normally be doing if he were a client.

18 Q And do you view Mr. Bannon as a client? He's one of your public relations
19 clients?

20 A Yes.

21 Q Okay. You're not an employee of his?

22 A No.

23 Q I see. And you never have been?

24 A No.

25 Q And you're not an employee of Real America's Voice or the network that

1 broadcasts his podcast?

2 A Correct, no.

3 Q Okay. When's the last time you spoke with Mr. Bannon?

4 A He called me yesterday morning about an article, a profile that someone's
5 doing. And then he texted -- he texted this morning about it. It was a long-standing
6 process that has been going on for some months. It got delayed with Ukraine and then
7 that sort of thing.

8 So I -- I've got to figure out a way to hand that off to somebody, and I just have not
9 have had the time to do that, so he called me about that.

10 Q Have you talked with him at all about the fact that you're being interviewed
11 by the Select Committee?

12 A He -- I did not tell him that I was talking with you today. I did mention,
13 when -- when [REDACTED] first reached out, just because I knew it would take some time
14 away from things that I would need to do.

15 Q Sure.

16 A And so -- but we -- I've not told him that I was speaking with you today.

17 Q Did you tell him, after [REDACTED] reached out for you, did you tell him that it
18 was your intention to agree to meet with us?

19 A I don't know if I -- I can't recall what I said, but my intention was always to
20 talk with you, and -- so that was always my intention.

21 Q Has he ever told you that you should or shouldn't talk to us?

22 A I don't recall having that conversation with him, but in general, I mean,
23 I -- I -- I don't recall him saying that to me, no.

24 Q How about, in any way, suggesting how you should handle the request from
25 the Select Committee?

1 A No. It was very brief, as I recall, very brief conversation, and -- no. I
2 mean, very brief conversation. I don't recall that at all.

3 Q Okay. Anyone else, have you told anyone else other than your family, your
4 attorney, that you're meeting with us?

5 A I did tell -- on the list of the names, I told a couple of friends, just because I
6 was trying, you know, look, my flight was going to get cancelled, but I could -- why are
7 you not going back when you could go back yesterday and whatnot and whatever.

8 A And then I did mention it to Caroline Wren. I did mention to Kimberly Guilfoyle.
9 We did not speak about it in detail whatsoever. So that was it.

10 Q Okay.

11 A In fact, you know, Caroline -- Kimberly, who is a very good friend of mine,
12 doesn't know I'm talking with you today. Yeah, just.

13 Q Okay. I think your attorney, before we went online, your attorney
14 mentioned that the news media had picked up on the fact that we were meeting today.
15 Do you have any idea of how they would've picked up that information?

16 A No. No. And, you know, with my mother's situation, I'm -- it's not
17 helpful.

18 Q Yeah.

19 A I didn't tell her that I was talking with you either because I didn't want to
20 upset her, so not helpful.

21 Q Yeah, okay.

22 A But --

23 Q So you mentioned that you grew up in Pennsylvania. Have you been
24 involved in Pennsylvania politics --

25 A Yes.

1 Q -- during the course of your adult life?

2 A Yes.

3 Q In what regard?

4 A So I actually grew up in politics. Both of my parents are political. My
5 mother's actually a life-long Democrat, and actually has had an event with Joe Biden at
6 our house years ago. Of course, he's from Scranton, and I'm from Scranton. And my
7 dad's -- my dad's a Republican. So I grew up politically.

8 And so, for that standpoint, just kind of I'm in the political world just by who
9 would be friends growing up, on both sides. We're friends with the Caseys, and we're
10 friends with the Scrantons. So that sort of thing.

11 Q Yeah. So, I guess that's Pennsylvania for you, right?

12 A Yes, it is. Yes, it is.

13 Q So do you, in your professional work, do you do what you would consider to
14 be political consulting?

15 A I don't view it as political consulting. I view it as public relations but in the
16 political space -- or in the policy space.

17 Q Okay. And do you have either personal or professional relationships with
18 any current members of the Pennsylvania congressional delegation?

19 A Yes.

20 Q Who?

21 A I know quite a few of them, and I've worked with a few of them. I couldn't
22 name you all of them, but -- of the people that I know, but I know Jay Corman --

23 Q Well, I'm asking, sorry, starting with the Congress, House of Representatives.

24 A Oh. Oh, okay, sorry. Well, I know Bob Casey, Senator Casey. We're not
25 best friends, but our families have been friends for generations. So I know Senator

1 Casey.

2 I know Senator Toomey. Again, he's not -- we're not best friends, but I know
3 him. I know Congressman Dan Meuser. I'm trying to think of who all the delegation is.

4 Q Scott Perry? How about Scott Perry, any relationship with him?

5 A He's not a close friend of mine or acquaintance. I'm sure I met him -- I
6 assume I've met him. I can't remember.

7 Q Fred Keller?

8 A Who?

9 Q Fred Keller.

10 A I think I've probably met him. He's not a close friend. And I have -- I just
11 have met before Mike Kelly, Congressman Kelly, but -- he's not a close friend, but I've met
12 him. I'm not sure he would remember me or not.

13 You could go through the names, and I would kind of remember, but --

14 Q Great. So -- but you mentioned Congressman Meuser. Is that someone
15 that you've done work for?

16 A No.

17 Q What's the nature of your -- how would you describe your relationship with
18 Congressman Meuser?

19 A I think that we're acquaintances and friendly, that sort of thing.

20 Q My understanding is that he's been on The War Room podcast. Is that
21 something that you helped to facilitate?

22 A I believe in the past I have, but that they also had him on their own too. I
23 can't -- can't recall, but I believe we've talked about it, but I think that they also -- he may
24 have been on recently, they did on their own. So that's my recollection.

25 Q Okay. You started to mention earlier, in response to my question, some

1 State legislators in Pennsylvania that you know. There's probably quite a few that you
2 know or have known over the years?

3 A Yes.

4 Q You mentioned Jake Corman.

5 A Yes.

6 Q Is that someone that you've done professional work for?

7 A Yes.

8 Q Tell me about that.

9 A That was basically around PR and messaging.

10 Q In what time frame did you work for Mr. Corman?

11 A I don't remember exactly, the exact time. It's, like, over the last year
12 and -- again, with the stuff with you all and then with my mother, I just have kind of
13 limited -- it's taken some time. So I -- I'm not working for him right now -- or with his
14 team, I should say. That's more to the point.

15 Q How about Doug Mastriano, do you know him?

16 A I do.

17 Q Tell me about any professional or personal relationship you have with
18 Mr. Mastriano?

19 A He's someone -- he probably doesn't remember who I am. I -- he's been on
20 The War Room. I helped facilitate that. He's since been on, I think, on his own. I
21 don't know him really well, and I've -- I'm not a fan of his. Sorry. I mean, I shouldn't
22 say that.

23 Q No, no, no. That's okay.

24 A I just don't -- I don't -- I just don't agree with him on stuff.

25 Significant -- significant, the way he -- I just know he's not my cup -- cup of tea.

1 Q Yeah. I don't want to get sort of too personal, but is there a -- is there a
2 particular issue that he's taken a position on that's rubbed you the wrong way or that's
3 caused you to react the way you did?

4 A I don't -- I don't track him, generally speaking, but I think I disagree with him
5 on some of the election integrity issues.

6 Q Anything in particular?

7 A I think that -- I come to my own conclusion. Election integrity is very
8 important, but I came to my own conclusion that Donald Trump lost, and it was time to
9 move on, and I don't -- I see that he doesn't want to do that.

10 I mean, I think there's -- it's admirable to pursue the sanctity of the electoral
11 process. So I admire that with anybody, either party, whatever, wants to talk about
12 that. But I think sometimes it's enough already on the process, and so I just don't agree
13 with his efforts, whatever they may be. I don't know the details, but I just don't -- it's
14 not my -- I just don't agree.

15 Q And we'll probably -- we're going to go through a few of them, the text
16 messages where I think he's mentioned, and so we'll probably talk in more detail about it.
17 But I'm curious about your statement you just made about, you know, it sounds like
18 you've reached a conclusion with regard to the 2020 election, but he continues to sort of
19 press these efforts even what you would consider sort of passed the appropriate time to
20 have done that. Is that -- I mean, is that a fair characterization?

21 A Generally speaking, yes. I mean, again, I think that it's important that the
22 majority of the country feel that there's -- there's fairness in elections, of course. But I
23 think there is an expiration on reliving the past and kind of going forward about things.

24 And I've come to my own conclusion that Donald Trump lost, and Joe Biden was
25 going to be the President and is the President. And so, I think we should move forward.

1 I don't follow him in detail, but I just know that he's kind of still talking about this
2 stuff, and I just don't think it's helpful.

3 Q Can I just ask when you came to the conclusion that Donald Trump lost the
4 election?

5 A I've -- I've kind of gone up and down. I thought he was losing on Election
6 Day -- election night. So I thought he lost on election night. And then all these stories
7 came out about different things. So then I thought, well, let's hear them out. Let's see
8 what happened.

9 There was certainly lots of random, anecdotal stories about things that hadn't
10 happened in the past -- or to the extent that they hadn't happened in the past, like, for
11 instance, two teachers that I know, who always voted, went to go and vote, and they
12 were told something like, we already have an absentee ballot for you, or you
13 already -- there was just something amiss, and they were shocked. It'd never happened
14 before. And so there was lots of anecdotes -- or there was certain anecdotal stories.

15 But I -- and I think it's worth talking about, but I -- I'm not exactly sure what day I
16 thought that it was enough, but at some point, I thought it was just enough, that there's
17 only -- there's only two parties, and only one person can be the winner, and Joe Biden is
18 the winner. That's, you know -- I mean, again, it's a valuable conversation to talk about
19 election sanctity and the vote and everything, but I came to my own conclusion that I
20 thought that he, Donald Trump, lost, and Joe Biden won, and that was it.

21 Q I'm not going to press you for a day that you came to that conclusion, and
22 maybe it was over several days or weeks even, but I am interested in understanding when
23 in the process.

24 So you said you had certain views on election night. Then you were hearing
25 stories and you wanted to sort of let this process play out and maybe hear more and

1 understand more.

2 And then at some point, you came to a conclusion that Donald Trump had lost and
3 Joe Biden had won. What's the rough time frame? Are we talking about before the
4 inauguration?

5 A Oh, I mean -- by the -- oh, I mean, yeah. I mean, Joe Biden -- Joe Biden
6 should've been inaugurated, was inaugurated without question.

7 Q Okay. How about before January 6th?

8 A I thought on January 5th that this was the last time that Donald Trump
9 would be giving a speech as the President of the United States, with 100 percent
10 certainty. That's what I thought and -- yeah.

11 Q And did you think that -- and forgive me, because I want to push a little bit
12 on this because I want to really understand where you're coming from, and I think it'll
13 help us throughout the course of the rest of our questioning to understand your
14 perspective on this.

15 Was he giving the speech just because -- well, not giving the speech. Was it your
16 view that it was going to be his last speech as President because all paths to challenging
17 the election had sort of come to an end or because you felt that the election, you know,
18 wasn't stolen and that he legitimately had lost? I mean, I want to understand a little
19 more about why you, you know, what your thought process was on January 5th?

20 A What I thought in general was that this was the last time Donald Trump
21 would be giving a speech as President of the United States and -- generally speaking.
22 And, you know, you'd hear one story, a random story, and think, maybe, well, was it
23 stolen? I don't know.

24 But to me, it kind of became irrelevant. The system is the system, and the rules
25 of the system need to be followed. And there's a time when you're allowed to challenge

1 absentee ballots in the courts. There's a time when you can go to Federal court.

2 There's obviously a time when people have gone to the Supreme Court.

3 But the structure is -- the rules are the rules, and the date -- the date of
4 swearing-in should be the date of swearing-in, and that was swearing-in with Joe Biden.

5 So I went to, on January 5th, the rally, thinking, this is the last time that I may be
6 on the White House grounds in my life. I don't know. And the last speech that -- that
7 President Trump would give on the White House grounds.

8 Q Was there some point before January 5th -- I mean, today we're going to talk
9 about some of the interactions you were having with folks who were spending a lot of
10 time and energy trying to overturn the results of the election.

11 A Uh-huh.

12 Q And in the course of -- and you were sort of at least a witness to that.
13 People are communicating with you, you're kind of an intermediary with people who are
14 engaged in these efforts. Was there a time in those months -- November and
15 December -- where you thought, what are we doing here? I mean, this is not -- you
16 know, we shouldn't be -- these folks shouldn't be engaged in some of these efforts that
17 they're engaged in?

18 A I don't know which means -- you mean, which folks and who in specifically.
19 In general, I think it's a concern that both sides have felt, for at least now two elections,
20 that we have electoral issues. That's not good for our country. Specifically -- and that
21 makes me sad and it makes me concerned about our country.

22 Specifically, with regards to some of the people that I know, I don't agree with
23 them on some of these issues. I mean, it's -- it's -- we need to talk about it, so
24 everybody can come to a conclusion on how we can have a fair and free election system
25 that both sides agree and are proud of.

1 But I didn't agree with everybody. It's worth having the conversation, you know,
2 let's hear what -- let's hear what -- if there's evidence, let's hear it. It's worth having a
3 conversation. But as a -- in terms of the process of who was going to be the President of
4 the United States, and when that day was going to come, I believe that it should always
5 have been the date in which it occurred, that Joe Biden was sworn in as President.

6 Q Did you ever talk to Mr. Bannon in November or December about whether
7 the efforts to challenge, overturn the election, were appropriate?

8 A In what time frame?

9 Q November or December.

10 A What I remember -- and it was, you know, a long time ago -- what I
11 remember is saying was the saying -- but I don't remember what month it was, but it
12 really clicked with me, because I'm a big fan of Vince Lombardi. And it's like
13 about -- there's second-place bowl games, and they're played by losers.

14 And so -- and I'm not calling anybody -- I don't mean a loser as in like the state of
15 your soul.

16 Q Right.

17 A I mean, Villanova's a loser. So I've said that to people in hopes that they
18 might agree with me, that it's important to have the conversation so that the vast
19 majority of people on both sides believe the election -- our elections are honest and fair.

20 But that at some point, we've played the game, the bowl game, like Vince
21 Lombardi talked about, and we lost. So rehashing it is what losers do.

22 Again, I don't mean the state of your soul. I mean, move on, and I thought that
23 the President who's done many great -- President Trump, who's done many great things
24 for many, many people, and created jobs and everything, but I thought that -- I remember
25 saying that, you know, he should go to Mar-a-Lago and have his own, you know, kitchen

1 cabinet there, his own group of people on different issues, and he could talk about issues
2 from there. And that's what I thought.

3 Q And what did Mr. -- you had this conversation with Mr. Bannon at some
4 point?

5 A I don't know exactly what I talked to him about. We don't talk much on the
6 phone. It's more text messages. But I -- I'm like 99 percent sure that I sent him that
7 text about the bowl game, and I know I sent to other people too.

8 Again, and I don't mean that you can't talk about election integrity issues. That's
9 fine. But rehashing what was a bowl game -- the Super Bowl happens, there's a winner
10 and there's a loser. And they can have commentators on ESPN talking about this play
11 was fair and that play wasn't fair. But to me, it was to time -- there was just a time to
12 move on in that -- in rehashing that.

13 Q Okay. So I want to put a pin in that because I think we're going to come
14 back to some of those. We do see some of those sentiments expressed in your text
15 messages, and maybe as we go through some of them, we can talk about sort of your
16 thought process at the time and who you were sort of sharing that with and what other
17 views you were hearing.

18 Mr. [REDACTED] I see [REDACTED] has come on. [REDACTED], do you want to pick up the
19 questioning here?

20 Mr. [REDACTED] Yeah. Thank you, [REDACTED] [REDACTED]
21 [REDACTED]

22 Ms. Preate. Thank you.

23 Mr. [REDACTED] I'm sure it's a hard time, and we really appreciate you still taking the
24 time to talk to us.

25 Ms. Preate. Well, you guys were very nice about, like, changing dates and, like,

1 everything. I was, like, I'm not going to worry -- like, try and get on a plane and then the
2 plane get delayed and try and do it from the airport and whatnot. So I really appreciate
3 it.

4 Mr. [REDACTED] Thank you.

5 BY MR. [REDACTED]

6 Q So I want to jump back a little. [REDACTED] was asking you about State legislators
7 from Pennsylvania and Members of Congress from Pennsylvania. And I was wondering
8 about some other people you might know in the state. Do you know Frank Scavo?

9 A I do.

10 Q Can you describe your personal and professional with him?

11 A I don't know precisely what you mean by professional, but we -- you know, I
12 haven't worked for him or --

13 Q Okay.

14 A -- vice versa. He's a local politician. Where I grew up, he's a very, very
15 well-known guy to -- you know, in northeastern Pennsylvania. You know, he's -- he's in
16 the paper often, even before all of this stuff happened.

17 Q Okay. And I should've been clear. This is Frank Scavo III, correct, Frank J.
18 Scavo?

19 A I'm not sure what, but --

20 Q The Frank Scavo you were texting with --

21 A Yes.

22 Q -- in what you produced.

23 Okay, thank you. And you never worked for him directly, correct?

24 A No.

25 Q Did you facilitate his work with Mr. Bannon -- or sorry -- his connection to

1 Mr. Bannon?

2 A I believe so. I mean, I -- I can't remember. Someone may have told him
3 about Frank before me or after me or whatnot, but I did talk -- yeah, Frank was on the
4 show.

5 Q And do you remember when you connected Mr. Scavo with Bannon? Was
6 it before the 2020 election, or was it just afterwards?

7 A You know, just as you were asking me the question, I'm just try- -- I was just
8 already trying to think about all that. I'm -- I'm not great on -- on dates. I'm sorry.

9 Q That's okay. But you definitely did connect Mr. Scavo to Bannon after the
10 2020 election?

11 A I just don't remember the -- the dates --

12 Q Okay.

13 A -- or what I recall is that I helped get him on the show.

14 Q Understood. And do you have a sense -- or could you describe what
15 Mr. Scavo's role was in challenging the 2020 election, if you know it?

16 A I don't know what his, like, his formal role was. As I saw it, he was
17 a -- somehow, like, a member of the Republican Party. I don't know what his title was or
18 whatever, but he -- he was going to rallies.

19 Q All right. Was he organizing rallies?

20 A I can't remember, but I remember -- what I recall is that he organized a bus
21 or cars or something like that. I produced the documents that I did, but I didn't even
22 read them all. Like, I was just trying -- it was, like, trying to go back so far on your
23 phone, and it would -- the phone would shut off. Then you have to go back over it
24 again.

25 So I really tried to -- and with everything going on, I just was -- and trying to do

1 work, so --

2 Q It's understandable.

3 A -- I forget -- okay. Thank you.

4 Q It's understandable. It was a long time ago. You did mention he was a
5 politician. Was he an elected official or just someone involved in local politics?

6 A I think he was elected at one point. I think. Maybe school board, I think.

7 Q Okay. Regardless, he was active in local politics?

8 A Correct. He's -- he's a well-known person in -- in the area.

9 Q All right. And do you know if Mr. Scavo had any connection to the Oath
10 Keepers?

11 A No. No. I -- no. I don't -- and I also don't, like, I don't even -- I know
12 who the Oath Keepers are by name, like --

13 Q Right.

14 A -- what the name you just said after that, no. I don't know Frank really that
15 well, and, no, I don't -- I've never heard that before ever, that I recall.

16 Q So would you say Mr. Scavo didn't ever talk to you about [inaudible] and
17 groups like the Oath Keepers or --

18 A The only -- the only thing that I recall about Frank Scavo is that he was in
19 Republican politics, so.

20 Q Sure.

21 A Yeah, that's what I recall.

22 Q Thank you. And how about Doug McLinko, if I'm pronouncing his last name
23 correctly?

24 A No. I mean, I -- as I know him, he's just a very nice guy who is a county
25 commissioner.

1 Q Oh, I'm sorry. I should've been much clearer on that question. So you do
2 know Doug McLinko?

3 A Yes.

4 Q Okay. And --

5 A By the way, that's -- if I may, like, when Mr. Harris was saying, how did I do
6 the search --

7 Q Sure.

8 A -- I just started thinking, like, his name was never anything you asked me for,
9 but I just kind of was thinking who might, with doing a grid about how to search, so, you
10 know, I don't know, that's just -- that's the way I thought of him.

11 Q Okay. So maybe can you explain why you thought that he would fit into
12 the grid even though we didn't ask for his name?

13 A Because I think that -- I'm not exactly sure how he came up, but I think it
14 was, like, I typed in the word bus, or one of the words like that or -- or one of the words
15 that you gave me. But I tried to do a search that way because, again, it was,
16 like -- anyway, that's it.

17 Q Okay. So it was one of our search terms prompted his name to come up
18 more so than that you just thought of him?

19 A Yeah, I -- I think so, like, I think so. No, I can't remember. But whatever it
20 is, I just tried to think on my own as to get the meaning of what you're looking for by
21 doing a grid like that.

22 Q Understood. So why don't you -- I think I cut you off, but can you explain
23 your personal relationship to Mr. McLinko?

24 A He's an acquaintance through politics, and that's how -- that's how I met
25 him, something like that.

1 Q And he's also a local Pennsylvania politician, then?

2 A Yes. I think he's the county commissioner. I should know that. I
3 just -- I'm pretty -- I'm 99 percent sure that's what he is, yeah.

4 Q It's okay. Did you connect him with Mr. Bannon ever?

5 A He -- this is my recollection, and I hope it's right, but he was on the show, I
6 think, once.

7 Q And --

8 A Yeah.

9 Q Go ahead.

10 A No, no. Go ahead. Sorry. Yeah.

11 Q I was just going to ask if you remembered what time he was on the show,
12 but --

13 A No. I'm sorry.

14 Q That's okay. And like Mr. Scavo, was he also active in protesting the 2020
15 election?

16 A I don't know exactly what -- I'm not exactly sure.

17 Q Okay.

18 A You know, I think he's someone that is concerned about election integrity.
19 In the details of all that, I can't really recall, but -- I mean, there are a lot of people that
20 are, right? So --

21 Q Right.

22 A But he's -- yeah. But he's -- he's active in the party, you know, so that's
23 some- -- he cares about those issues, but I don't know, yeah.

24 Q It just doesn't pop off your head whether he was very involved with the
25 protests?

1 A No, no, no, no, no. Very involved with which protests?

2 Q For the 2020 election. I'm sorry. Like, anything in Pennsylvania
3 protesting the 2020 election.

4 A But I mean, protest, you mean as a verb, not as an event?

5 Q Well, I'll do two questions. One, do you know if he was organizing any
6 protests of the 2020 election?

7 A I don't recall really what he was doing.

8 Q Okay. But you do have a sense that he was actively protesting the 2020
9 election? That seems to be where you were going with that answer?

10 A No. I think -- I think what my recollection is, and I really -- is that he was
11 involved in -- in a case, like, an election case.

12 Q Okay. Well, thank you very much.

13 A Again, I -- that's my recollection, and maybe I was just skimming through and
14 not paying attention, and that's what stuck in my head, so I don't know.

15 Q That's okay. Do you know Pastor Sean Moon?

16 A No, I don't. I think that he -- I've read stuff about him. I don't know if I've
17 ever met him. So I don't know -- yeah. I don't think I've ever -- I don't think I've ever
18 met him, I don't think, no. But I know that he has this event.

19 Q What event is that?

20 A Now, again, I -- but he has an event that political people go to.

21 Q Got it. And that is an event that Mr. Bannon has been to?

22 A No. As far as I recall, he only -- He did it via video. But I can't -- yes, I
23 think that happened. I mean, he may have -- one time he tried to call in to one event
24 and the system went down. So I think one time it worked and one time it didn't, I think.

25 Q Okay.

1 A I think that's what --

2 Q We might come back to one of those possible events a little later. Do you
3 know Teddy Daniel?

4 A I do.

5 Q Okay. How do you know Mr. Daniels?

6 A You know, just met him through different political things and -- yeah.

7 Q Did you ever work for him?

8 A No.

9 Q Okay. Do you have a sense of what his connection to Mr. Bannon is?

10 A He's been on the show, but -- I helped book him on the show, once in a
11 while. I mean, I'm not -- I don't -- I don't run the show, and I was specifically told by
12 Mr. Bannon that I'm not to be involved in the show, I have to focus on media. But, you
13 know, once in a while, he'll ask, or somebody will ask me if they want to go on, and then
14 he has the people that work on that.

15 Q Got it. And do you know if Mr. Daniels is connected to a group like the
16 Oath Keepers?

17 A I've never heard that, that I ever recall about him or Frank or Doug. That I
18 ever recall, no.

19 Q But Mr. Daniels is a member of Vets for Trump, correct?

20 A I don't know. I'm not sure. I may have known that and forgotten. I
21 just -- I just think of him as someone that was running for Congress, and now I think he's
22 running for lieutenant governor. I don't know if he's still running.

23 Q Right. And how about Charles Bausman, B-a-u-s-m-a-n?

24 A Charles?

25 Q Charles Bausman. I'm not sure I'm pronouncing the last name correctly.

1 B-a-u-s-m-a-n. Maybe Bausman.

2 A Remind me who that is.

3 Q He was just another person who was active in northeastern Pennsylvania
4 after the 2020 election, involved with contesting the 2020 election.

5 A Bausman. I don't -- I mean, I don't -- yeah.

6 Q If you can't recall, that's completely fine.

7 A Yeah, I can't recall. I'm sorry, yeah.

8 Q That's fine. Thank you. And then a couple of people who might not be
9 tied directly to Pennsylvania. Do you know who Ben Bergquam is? B-e-r-g-q-u-a-m.

10 A Is he the -- is he the reporter for Real America's Voice?

11 Q Yes.

12 A I know who he is, yeah.

13 Q Do you have, like, a personal relationship with him, or do you just know him?

14 A No, I don't. I don't think -- I don't think I've ever been in touch with him
15 myself, no. I -- Steve said many times that I'm not to have a part of the show. If
16 somebody comes and asks, do you want to go on, or if he asks me, do I know this guest,
17 but he plans the show, and so I don't have anything to do with that.

18 Q Completely understood. Do you know Tony Dolan?

19 A I do, yes.

20 Q How do you know Mr. Dolan?

21 A I can't remember where I met him. What comes to mind is, he was a
22 speech writer for the President, and he may have been a speech writer for Newt Gingrich.
23 I met him sometime in the last several years.

24 Q Got it. Do you remember if he put you in touch with other speech writers
25 in the Trump administration?

1 A I don't recall.

2 Q Does the name Vince Haley --

3 A Oh, yeah. I know who -- but he didn't put me in touch with Vince.

4 Q Oh.

5 A I already -- I already know Vince.

6 Q Okay. So how do you know Vince?

7 A He was involved -- we were involved with Catholic stuff together,
8 Catholic -- he did a wonderful, a beautiful movie on Pope John -- Saint Pope John Paul II,
9 and he also worked for Newt Gingrich.

10 Q Okay. And are you in regular contact with Mr. Haley?

11 A Not regular contact. I mean, I -- if I see him, I would consider him a friend,
12 you know, we're friends. But he's busy, and I'm busy and -- so I've seen him -- I haven't
13 seen him much. We used to be, like, maybe like 8 years ago or 12 years ago, when he
14 was doing the movie, we would talk -- we would know each other more and work on
15 Catholic things.

16 But I haven't talked to -- I maybe talked to him, say hello a little bit ago, but we
17 haven't really caught up, no.

18 Q All right. So you haven't been working with Mr. Haley recently then?

19 A No. Uh-uh. He's a -- he's a really great Catholic, and, you know, we've
20 talked about working together in the past, but because we did the -- you know, I can't
21 remember what things we worked on together, but pro-life Catholic things years ago, so.
22 Yeah. He's, you know, a very good Catholic guy.

23 Q Understood. This is a very specific time period. Do you remember talking
24 to him around mid-December of 2020?

25 A I don't.

1 Q That's okay.

2 A I don't. Is he in my text messages? I could go back and look. I don't
3 recall.

4 Q He's not in your text messages, but --

5 A I don't recall. I mean, maybe we did, but I don't recall. Maybe he did.

6 Q That's okay. If you don't remember what the conversation was about,
7 that's completely understandable, or even if you had a conversation.

8 A Yeah, I -- thank you. Yeah.

9 Q That's okay.

10 A I can't remember what I ate for lunch yesterday, so. [REDACTED]

11 [REDACTED]

12 Q That's very understandable. I can't remember what day of the week it is,
13 so. And you have much more reason than I do.

14 A I don't blame -- I don't blame you. We need -- we need to have, like, a
15 moratorium on, like, cell phones from, like, Saturday night, to keep the Lord's day. And
16 we all need a break, especially with this war stuff, it's frightening.

17 Q That would be some interesting government legislation. But before I kick it
18 back to [REDACTED], I just want to note for the record that [REDACTED] joined us as well.

19 A Okay.

20 Mr. [REDACTED] I'm all set now, [REDACTED] if you want to take it back.

21 Mr. [REDACTED] Thanks, [REDACTED].

22 So, Ms. Preate, are you okay? You want to keep going, or do you need a short
23 break?

24 Ms. Preate. I'm fine if you are.

25 Mr. [REDACTED] Okay, great.

1 Ms. Preate. Thank you for asking.

2 BY MR [REDACTED]

3 Q So I want to ask about some more of your clients, and I'm not going to sort
4 of delve too deeply into the public relations work you do for them, but just want to
5 understand what the connections are with some folks.

6 Did you have any -- in the last couple of years -- I'm not going way back, but in the
7 last couple years, have you had folks that you've worked with or clients of yours who are
8 in government? And that's State or Federal.

9 A Let's see here. Let me go back and think. I did work for a team that was
10 advising Jay Corman. And I advised his -- the people that were advising him on PR.
11 And I think that's it, but I could go back and look. Nothing's -- in the past.

12 Q How about any folks who worked for the Trump campaign?

13 A Did I work for any people who worked on the Trump campaign?

14 Q Yeah. Do you have any clients that were high-level folks in the campaign?
15 I don't mean people who volunteered or, you know, who knocked on doors.

16 A Oh, you mean --

17 Q But people who were employed by the campaign who happened to be your
18 clients?

19 A Like, I mean, besides Steve Bannon?

20 Q Well, was he employed by the campaign, to your knowledge?

21 A Oh. Well, I mean, in 2016 or 2020?

22 Q Fair enough. 2020.

23 A Oh, 2020. I'm sorry. Okay. I didn't -- I did not work on the Trump
24 campaign, and I did not work for the RNC during the campaign, so --

25 Q So, for example, Kimberly Guilfoyle --

- 1 A Yes.
- 2 Q -- is she a client of yours, or has she been a client of yours?
- 3 A She is -- she's a very dear friend of mine.
- 4 Q Not a client?
- 5 A No.
- 6 Q Okay.
- 7 A Oh, wait. Yeah.
- 8 Q I didn't mean to cut you off. Sorry.
- 9 A You know, that we're just good -- we're very good friends, and sometimes
- 10 we think about working on projects together, and that sort of thing, but --
- 11 Q Okay.
- 12 A -- she's --
- 13 Q Yeah. Have you finished your answer?
- 14 A No, yeah, yeah.
- 15 Q Okay. Peter Navarro, is he a client? Or has he been one?
- 16 A I worked for the book publisher that published his book, his recent book, and
- 17 I've helped him just as a friend, a little bit on projects. But I don't -- I haven't talked to
- 18 him in a long time.
- 19 Q Not a client?
- 20 A Not right now. He's never paid me.
- 21 Q Okay. How about Boris Epshteyn?
- 22 A He's just a friend for many years back before he was Boris Epshteyn of today.
- 23 Q Okay. I'm going to come back to that.
- 24 A Okay.
- 25 Q Sidney Powell, has she ever been a client?

1 A She was years ago, yeah, many, many years ago.

2 Q How far back?

3 A When -- about -- I helped her do book promotion.

4 Q So is that in her -- I'm blanking on the name of the book now. Do you recall
5 it?

6 A No, I don't recall the name. I'm blanking on it too. But the book was
7 about -- about the justice system and wrongful prosecutions where she actually was
8 working at the time with, that I recall, like, a lot of Democrats and -- like The Innocence
9 Project, people that were worried about wrongful prosecutions.

1

2 [11:00 a.m.]

3

BY MR. [REDACTED]

4

Q Do you still have any sort of relationship with Ms. Powell?

5

A No, I haven't talked to her in a long time.

6

Q Did you talk to her at all during the timeframe after the 2020 election?

7

A I don't recall, and I can -- happy to go back. But I don't recall the last time I

8

spoke with her. But we have not been in touch significantly in some time.

9

Q Did you ever help facilitate having her appear on the War Room?

10

A I think -- I was -- maybe in the very beginning, but then Steve got her -- this is

11

my recollection -- then Steve was getting her on when she would or might be on herself.

12

I -- I greatly admire the work that she did for the book because there are many

13

people that have been wrongfully prosecuted. And the University of Pennsylvania has a

14

wonderful effort, and we see even today people like that might have been on death row

15

that were taken off of death row and found to be innocent. And my dad's a very big

16

advocate for that and does a lot of pro bono prisoner reform work.

17

But I think she and I kind of diverged on the election stuff. And so I have not

18

talked to her, because I think, from what I read, that we're not on the same page on some

19

of the stuff of the election stuff.

20

Q Okay. We're talking about your friendship with Ms. Guilfoyle. When did

21

you first meet her?

22

A Years ago. Years and years ago when she was at FOX News.

23

Q Between the 2020 election and the end of the Trump administration, sort of

24

what was -- I know that's a while ago and it's also a sort of extended period of time, but

25

so for those few months before the end of the Trump administration, what was sort of

1 your level of interaction with Ms. Guilfoyle? Were you still in fairly frequent contact?

2 A So like the months of --

3 Q That would be November-December of 2020 and January of 2021.

4 A You know, we go -- everybody gets busy, so you talk a lot, then sometimes
5 you don't and whatever. I can't remember how back then, other than going back and
6 pulling the texts for you about that. I consider her a very dear friend. So even if we
7 don't talk for a couple days or something or -- I mean, I'm in Florida and this trip I didn't
8 talk to her, I didn't see her, only because I had clients here and I couldn't -- you know, I
9 just didn't have time. But, you know, she's a good friend and I -- whatever the text
10 messages that I pulled for you.

11 Q Yeah. And they certainly reflect a friendship and affection for one another
12 for sure. I think there was -- in some of those texts she was asking you, almost pleading
13 with you to come move to Florida and be near, if I'm not mistaken.

14 A Yes. Yeah, yeah. So -- yeah. And, again, some of the stuff in there I just
15 pulled because it was the dates. Like you said, how did I get them. They are not
16 relevant to, you know, election issues, but it was just in a stream of the timeframe that
17 you were asking, so just --

18 Q Sure.

19 A -- gave that to you, yeah.

20 Q Sure.

21 A So you didn't have to see our stuff about I need to leave New York City.

22 Q Yes. And we certainly -- I don't want to -- we don't have to discuss your
23 personal sort of business on the record here, but, you know, it's of interest to us because
24 Ms. Guilfoyle did have a role with the campaign and I think you attended the January 6th
25 rally with her and Don Jr. Is that right?

1 A Well, I mean, not with them, but they were -- they were on stage. I was
2 just a guest.

3 Q Okay. Did you end up -- did you go over with them? Did you go to the
4 rally with them?

5 A No.

6 Q And you were seated out in front of the stage. They were presumably in
7 the VIP tent. I think there's been videos of them in the tent.

8 A Yes. That's the way I recall it, yeah.

9 Q Did you spend any time in the VIP tent that day, do you remember?

10 A No.

11 Q Did you play any role in having Ms. Guilfoyle speak at the January 6th rally?

12 A I did not. I've never worked with the people that organized it. I did
13 not -- they did not hire me. They never asked to hire me. I didn't want to work on it.
14 So I didn't have -- I did not -- I mean, I think she wanted me to come and -- as I recall it, as
15 I recall it, she wanted me to hear her come and speak, if I wanted to come and
16 speak -- she wanted to have me there to hear her speak. But that would be standard,
17 you know, have -- you know, come and have her -- hear her speak here or there and that
18 sort of thing.

19 Q So you didn't -- you didn't arrange that speaking gig for her?

20 A No, not that I recall. I think --

21 Q Did you play any role in getting her paid for that speaking gig? I'm calling it
22 a gig, but those speaking -- for giving the speech at the January 6th rally.

23 A Not that I recall, and -- but I didn't really even know who was speaking. As
24 I -- yeah.

25 Q Do you know whether she was paid to speak at the rally?

1 A I don't recall. She may have been. I just don't recall it, you know.

2 And I -- yeah, I just don't recall it.

3 Q Ms. Preate, do you remember ever preparing an invoice or directing
4 someone else to prepare an invoice relating to a speaking fee for Ms. Guilfoyle at the
5 rally?

6 A I don't recall. You know, she didn't have any help and I had this great
7 person that helped me. And so occasionally we would help her and, more specifically,
8 Rebecca would help her. But specifically, I mean, I have to prepare 10 invoices today.
9 I don't -- I don't really -- for myself, you know, just reimbursements and this and that.
10 So I don't -- I don't really recall, but the general thing is, you know, we would help her
11 sometimes if she needed help.

12 Q And do you know if Rebecca, Ms. Karabus, prepared an invoice for Ms.
13 Guilfoyle for the speaking -- for speaking at the rally?

14 A I don't recall, but she may have. I mean, I don't -- I
15 don't -- whatever -- whatever the documents are, she may have. Again, I mean, I
16 literally have today to prepare like 10 doc -- 10 -- go over these invoices. And so I just
17 don't recall. She may have.

18 But Kimberly's been -- you know, is one of the most sought-after speakers in the
19 country. She's loved. Like, people -- like, she's the top person that people want to
20 hear from. So I think it's standard that these folks get paid for their speaking. So I
21 don't -- but I don't remember that specifically, although she may have been.

22 Q Do you know -- do you remember ever talking to her about whether she
23 should be paid to speak at the rally or whether she should ask to be paid because she's so
24 sought after?

25 A I don't recall. We may have, but I don't recall. But, again, I wasn't

1 planning the rally. I didn't -- I didn't -- I knew very -- just very peripherally about all the
2 details. I really only went just because she was a friend of mine and I thought this was
3 the last time that -- who knows when I would get to be on the White House grounds,
4 which is pretty cool.

5 And I wasn't even going to go even till the last minute, but I was just like, well, you
6 know, the President of the United States, that's -- that's, you know -- I may never get an
7 invitation to be on the grounds of the White House. So that was -- that's my -- you
8 know, 2 years later, that's my recollection of the event.

9 Q Okay. Yeah. The -- I believe she was paid a fee and that Rebecca did
10 prepare an invoice for her. And I'm just trying to understand whether you were aware
11 of it, whether you negotiated it, or any of that.

12 A I didn't work on the event. So as you see in my emails, there's very
13 little -- there's some little communication with the Kremers, and I assume those were the
14 B2B (ph) people. But Rebecca is a very smart person. She -- everybody's busy. It's 2
15 years ago. Did we have a conversation? Maybe. I don't recall it, though. No.

16 Q Okay. Do you know if Don Jr. was paid a speaking fee?

17 A I don't recall knowing that ever, no.

18 Q How about Eric, Eric Trump?

19 A I don't recall knowing that. I'm not -- I know Eric a little bit, but we're not
20 friends. So --

21 Q Okay. So I'm going to talk a little bit about Steve Bannon and your sort of
22 work for him. And run through a number of questions about things Mr. Bannon said or
23 did or thought. And, of course, you can only answer to the extent that you know, right?

24 So I'm not asking you to speculate at all, but as someone who looked like they
25 were having a fair amount of contact with Mr. Bannon in the relevant time period, it's

1 helpful to get your perspective and your sort of experience on that. Okay?

2 So if this seems particularly focused on someone else and what they were thinking
3 and doing, I'm recognizing that in advance and want you to know that we can only ask
4 you to tell us what you do know and interactions that you had and recall.

5 A I'm happy to help you. I think what happened on January 6th was awful, so
6 much so I really haven't even watched much television about it. I think it's very sad.
7 So I'm happy to help for what I know, which is not much, but I'm happy to help, yeah.

8 Q Thank you. So I'm going to sort of back up well before January 6th just to
9 sort of understand context here. When did you first meet Mr. Bannon?

10 A I've been asked this question, like, by reporters, by many people. I met
11 him, I mean, years ago, just like the way I would meet -- you might have met, you know, a
12 Congressman or something, you know, in your life, but you don't -- and so we had very
13 little communication. But once in a while, since I do events, I would invite him to an
14 event where I'd be inviting 500 people or something like that, you know.

15 And then I was hired to work on a project in the summer of 2016, I think in May.
16 And the only reason why I even remember that is because I've been asked so many times,
17 so I've kind of -- and then I worked for him on -- as a spokesman on the Trump campaign.
18 Then we basically worked on and off some period of that time.

19 Q So after 2016 --

20 A Yes.

21 Q -- you're talking about?

22 A Yeah. Exactly right, yeah.

23 Q And from the 2016 through 2020 timeframe, what was the nature of your
24 work for him?

25 A PR. So dealing with media. And he, generally speaking, like, silos,

1 like -- kind of like the Wall Street mentality was what I always thought, is you do this,
2 someone does that, someone does that. So my -- my focus was to do -- to do media.

3 Q Media meaning sort of public relations for him?

4 A Yes, correct. That whole sphere, yeah.

5 Q So, I mean, the podcast, his War Room podcast would be media, I take it, but
6 you're not thinking of that. You weren't producing the podcast --

7 A At one point when he thought about having a show, he said, you would be
8 the producer. But then when it actually came to pass, that is really such a big task, and
9 so no. I mean, I would -- in the very beginning, had a little more to do with it than I have
10 in the last 2 years or 3 years. And he's been very specific that I don't do the podcast.
11 You do not do the podcast. You focus on media and that sort of thing.

12 Now, if there's like this person that's working on a profile, she wants to know, you
13 know, where do you watch the show and when is it on and who are some of the guests, I
14 would keep a list and do stuff like that. But the nuts and bolts, I don't deal with the
15 people in Denver, and I'm not -- I haven't been to his studio in a long time. So I'm
16 not -- so that's the kind of focus --

17 Q Right.

18 A -- and lack thereof.

19 Mr [REDACTED], I see you came off -- you're on camera.

20 Mr [REDACTED] Yes.

21 BY MR. [REDACTED]

22 Q I just want to jump in quickly and follow up on your silo comment. I'm
23 pretty interested in hearing a little bit more about how Mr. Bannon operates.

24 So can we pull up exhibit 59 quickly?

25 Hopefully, it pops up on the screen pretty soon, but technology, as we all know.

1 Mr. [REDACTED] One second.

2 Mr. [REDACTED] Thank you.

3 BY MR. [REDACTED]

4 Q I can just start to describe it. I think you mentioned that you searched for
5 certain terms on your phone. Did you produce some of those searches to us, like in
6 screenshot form?

7 A Uh-huh.

8 Q Okay, good. So I did -- I think this is one of them that, once it's full screen,
9 we can chat about.

10 A Yeah. As you can see -- I mean, that's, I think -- that's, I think, Whats -- no,
11 it's not WhatsApp. No, that's not WhatsApp.

12 Q It's not showing --

13 Mr. [REDACTED] [REDACTED], can we get that full screen or a little larger?

14 Ms. Preate. I can't --

15 BY MR. [REDACTED]:

16 Q Yeah, we'll hold for a second. I'll just keep describing it to you. It's a
17 search for the term "Willard," and there are three conversations that pop up.

18 A Yeah.

19 Q Two are with your dad. And it looks -- we can't, obviously, see the whole
20 conversation, which is okay, because they're -- oh, it's gone. Well, I'll keep describing
21 until we have it on the screen.

22 The first conversation is from your dad, and it says something along the lines of,
23 thanks, Joe, and below are the document requests. It's from February of 2022, followed
24 by another message from your dad. And then Joe says something along the lines of, I
25 don't think they know how Steve operates.

1 A Uh-huh.

2 Q So I was -- do you know if this conversation is in relation to the document
3 request that we provided to you?

4 A I don't. I tried to -- I sought advice from Joe. I don't know if I -- you can
5 say this. I just --

6 Mr. [REDACTED] Sorry, this is Joe here. Is this attorney-client conversation, before I
7 ask the --

8 Ms. Preate. Yes.

9 Mr. [REDACTED] Okay. Then in that case, Joe, I think we shouldn't ask this question.

10 Ms. Preate. You want me to answer you?

11 Mr. Jay. She can describe broadly how Steve operates --

12 Mr. [REDACTED] Okay. Yeah.

13 Mr. Jay. -- without using the exhibit.

14 Ms. Preate. What I found is sometimes searches are weird on the phone, so I
15 tried to find out what you're asking for by searching, you know, different -- different
16 words. It's just to help try -- like, for instance, I recall typing in "bus," even though, like, I
17 could say, like, did my nephews get on the bus? But I just was trying to get you as
18 much -- close to as much information as I could for you guys.

19 So if -- you want to ask me about the Willard. Is that --

20 BY MR. [REDACTED]

21 Q No, no. Sorry. I was going to just work off your comment that Bannon
22 silos his work. Can you describe that a little more? Does he silo his communications
23 too? How does he separate his different parts of his work life?

24 A What do you mean?

25 Q Well, you mentioned that he -- right, so he silos media from the War Room.

1 A I don't work alongside of him. I work in a different location and have
2 basically most of the time that I've worked for him. So, you know, he has -- he'd have a
3 producer and that would be the producer of the show. I would do the media, so-and-so,
4 so-and-so.

5 Now, again, as I said, sometimes there would be overlap. For instance, like in
6 this case that you asked me about, like, you want someone from Pennsylvania. Well, I
7 know Pennsylvania, so he would ask me sometimes or I would offer people. But then he
8 also would know people on his own and have people on his own, so -- I don't know,
9 maybe I'm not answering the question. I apologize.

10 Mr. [REDACTED] No, that's okay. It's not the clearest question. And we can take
11 the exhibit down and move on. Thank you.

12 BY MR. [REDACTED]

13 Q So, Ms. Preate, in terms of the role -- your role with respect to the War
14 Room, and I know -- I understand what you're saying in terms of what Mr. Bannon had
15 told you, sort of stay in your lane or not, you know, get too involved.

16 But did you consult with him from time to time about appropriate guests for the
17 show? And I'm talking about in the 2020-2021 timeframe, not back in the beginning.

18 A I can't recall, but generally speaking, I have recommended guests to him or
19 guests that I didn't like.

20 Q Was that in your role of working for particular guests, or working with him as
21 a client, or just because he had a relationship with you and you knew some of the sort of
22 issues and players and you just were giving advice, unsolicited or otherwise?

23 A I think that's generally right, unsolicited or otherwise. Yeah, I think.

24 Q And were there particular issues that you were more sort of involved in in
25 terms of suggesting ideas for the show or guests for the show?

1 A In that timeframe or just always?

2 Q In that timeframe.

3 A I mean, I think that -- that those issues were -- were what was on a lot of
4 people's minds at the time. So that's what I recall. And partially also because if you're
5 asking me and thinking back, but I -- there are other people that I've recommended that
6 don't -- were not about election stuff as well. But he's really -- he's the driver of the
7 show, and he really has his own focus and his own -- his own -- the way -- his own design
8 of his own show. So that's the kind of structure, if that's helpful.

9 Q Yeah, it is. Let me just give you some sort of rough or ask you about some
10 rough sort of timeframes. In the early part of 2020, was there a particular focus to the
11 show that you recall?

12 A Well, in general -- I don't remember the dates, but in general, he's cared a
13 lot about election issues for sure.

14 Q Going back into early part of 2020?

15 A Oh, early 2020. Okay, let me think about this for a second.

16 Q Let me share -- I mean, my perspective or my sense of it was that there was
17 a focus, a substantial focus on the pandemic, on the coronavirus.

18 A Oh, yeah. Of course, yes. Sorry. Yeah, of course.

19 Q And did that -- and that carried through a good part of 2020, to your
20 recollection?

21 A Oh, yeah. I mean -- I mean, he still talks about the pandemic today -- or not
22 today, but, you know, in current 2022.

23 Q And Mr. Bannon was arrested, I think, in August of 2020, or charged?

24 A Yeah. I forget when it was, but yeah.

25 Q Did he continue doing the show or was there some hiatus in there, if you

1 remember?

2 A I'm so sorry. I can't remember what the timeframe was. We're 2022
3 now. I forget the exact timeline.

4 Q Okay. At some point, though -- and you've mentioned this -- he did
5 become fairly interested or the show became maybe focused on election integrity issues.
6 Is that fair to say?

7 A Yeah, I think that's fair.

8 Q Do you recall whether it was before the election that that focus sort of
9 shifted or not until after the election?

10 A No. What I recall, and I could be wrong, but he did talk about election
11 issues before November 2020, before election day. He did talk about those.

12 Q Were you -- maybe this is a helpful sort of question or issue to sort of get
13 squared away before I dive too deeply into sort of questions about the show. Were you
14 generally -- in that timeframe, late 2020, were you tracking the show on a regular basis?
15 Do you watch every day?

16 A I try. I try. But, look, it's hard because it's a lot of time, so -- and we all
17 multitask all the time. But I think it's smart to do it, to know what your clients are
18 saying. But it's a lot of time. So I would try to do it.

19 Q Okay. Were you on from time to time?

20 A I've been on a couple times. I don't like to be on, but once in a while I have
21 been on.

22 Q So I'm going to ask you a bunch of questions about guests who were on or
23 not, and I understand that you're -- this wasn't your primary responsibility and you're not
24 producing the show. So if you have knowledge of it or recollection of it, then just, you
25 know, let us know, and, if not, that's okay.

1 A Yeah, sure.

2 Q Do you know -- you mentioned the topic of the election coming up before
3 the election, before November of 2020. Do you recall whether Mr. Bannon was talking
4 about on his show the prospect of the election being stolen even before the election?

5 A Here's what I recall. And, again, I apologize, because you guys, you may all
6 have watched tapes. But I -- what I recall is his doing an interview. And I really -- I'm
7 sorry that my brain doesn't work like some people remember dates and all this stuff.

8 I do recall his doing an interview with The Circus, which is a television show, and
9 his talking about in that interview about how he thought the election would happen, you
10 know, that there would be election issues.

11 That's the only kind of specific thing that I remember, but I'm sure there was a lot
12 more. I mean, I'm not sure; I would assume there were more. A lot of people were
13 talking about, not just him, were talking about how the elector -- how the things because
14 of the -- how -- because of COVID, how things were going to be handled.

15 Q Uh-huh. But I'm interested specifically in your comment about the election
16 possibly being stolen. Did that topic come up on the War Room, if you remember?

17 A You know, I don't remember. I just don't remember, because they have so
18 many shows and so many -- but I'm sure -- I mean, I can't -- I would make the assumption
19 that it probably did, but I can't remember.

20 Q Do you remember ever talking to Mr. Bannon about his thoughts regarding
21 the possibility that the election might be stolen, having those conversations before the
22 election?

23 A I don't remember that much. I remember maybe a feeling of having a
24 conversation with him about it at some point, but I don't remember -- you know, I don't
25 remember all the specifics. But I -- you know, I know people were worried about it in

1 general. So I'm sure -- I'm sure -- I mean, I don't remember exactly, but I'm sure there
2 were. Yeah, I'm sorry I'm not -- so long --

3 Q That's okay. You don't remember specific conversation on that topic with
4 him?

5 A Meaning like what he said to talk about on the show specifically?

6 Q No. No, no. A specific conversation prior to the election in which Mr.
7 Bannon said to you or you heard him say to others, I think the Democrats are going to try
8 and steal this election, or something to that effect?

9 A You know, we often don't -- I'm not really -- I'm not with him face-to-face
10 often, so we don't usually have conversations with others. He's very -- very tight and
11 focused. Like, do this 30 seconds, get off the phone. Do this, talk for blah blah blah
12 blah blah. So I would often learn more about what he was thinking on the show than
13 any conversation we would have directly.

14 Did we ever talk about elections being stolen? I think so, but I don't remember
15 when -- I mean, I just make the assumption that we probably did. I think once we -- I
16 think I recall one, but I don't remember any of his -- I apologize. I just don't remember
17 details.

18 Q Okay. Do you know whether -- and this is a much broader
19 question -- whether Mr. Bannon was playing any role in terms of advising the Trump
20 campaign with respect to the 2020 election, either before or after the election took
21 place?

22 A And when you say "the Trump campaign," you mean like people that worked
23 on the campaign, anybody who worked on the campaign?

24 Q I'm talking about the upper -- either the White House, President Trump
25 himself, or senior sort of officials within the campaign structure.

1 A So here's what I remember. Well, some people like him, some people
2 don't like him that were in the campaign structure, number one.

3 Number two, I know at some point he hadn't been talking to the President and he
4 started talking to the President. I don't remember what day that was or when that was,
5 but there was a gap when they weren't talking and then they were, but the specifics of
6 that I don't recall.

7 Q Do you remember or are you able to say whether he resumed talking to the
8 President before the election or, like, was it sort of --

9 A I believe -- I believe it was before -- I believe it was before the election, but I
10 don't know when. I can't recall when.

11 Q Did he ever share with you the nature of -- the general nature of the
12 conversations he was having with the President, for example, the President is asking me
13 about this topic or that topic?

14 A Generally speaking, not at all. Not at all. He was very -- was very -- first of
15 all, again, sometimes he would just be like, do this, call this reporter, or, don't call this
16 reporter. So very -- you know, there's a lot to do. I do lots of stuff. I'm very busy.
17 Boom. But no.

18 I mean, once in a while we'll have a longer conversation, but most of our
19 conversations are very short. But I do know that at some point he started talking to the
20 President again. I'm sure we probably -- at some point, he said, oh, you know, the
21 President's in a great mood or something like that. But he was very private about his
22 conversations, not just with the President, but with other people in general.

23 You know, he really would stick to, most of the time, I need you to do this, I need
24 you to do that in phone conversations. Again, once in a while there would be a longer
25 conversation. But, you know, we'd share stories and that kind of stuff, but he's

1 generally so busy that he wants you to focus on what he wants you to do.

2 Q Got it. Got it. I'm just wondering whether there would have been a
3 conversation along the lines of, you know, to his public relations person, hey, Alexandra,
4 President seems to want me back in the fold or wants to get my advice on stuff or, you
5 know, we've patched things up or, you know, something along those lines, signaling to
6 you that there had been discussions and what generally those discussions might
7 have -- what that relationship was going to look like.

8 A I do remember something like that, of like -- but, again, he was -- I
9 wouldn't -- sometimes I would know that he spoke to the President, like in some the text
10 messages that I gave to you. But generally speaking, you know, we don't -- we certainly
11 are friends -- or I wouldn't say friends, but I worked together with him for a long time.
12 But I don't -- it's not like I'm talking to my buddy saying, you know, oh, I talked to the
13 President. No.

14 You know, again, I think in general he may have said, oh, I've patched things up,
15 but I don't -- or we've talked again or something like that, but not -- the way I felt
16 about -- my feeling about it was that he had a private conversation and he was not telling
17 me about anything in general. That was -- generally, that's what it was.

18 So I don't really know how often they talked other than the times that -- a few
19 times, and he didn't talk about on the show. And sometimes, you know, media would
20 reach out and say, we hear Steve is talking to the President. And it was always no
21 comment or stuff like that, so -- as far as I knew. And that's speaking generally of my
22 recollection.

23 Mr. [REDACTED] Okay. Ms. Preate, I'll note for the record that Mr. Raskin has joined
24 the interview.

25 BY MR. [REDACTED]:

1 Q Do you -- on the day before the election, there was an episode of the War
2 Room, and I think you may have actually been one of the guests or part of it. Maybe
3 you were at a -- doing a report with Raheem Kassam from Scranton. Do you remember
4 that?

5 A I was in Scranton, yes.

6 Q Do you remember the other guests on the show that day? I believe it was
7 General McInerney and Sidney Powell were on talking about the election that was coming
8 the next day. Do you recall that?

9 A No, I don't remember who was on, but -- and I didn't remember that I was
10 on that day, but I remember being in Scranton, yeah.

11 Q Did you book Ms. Powell on the show or did you play any role in having her
12 be on the show?

13 A As I said, I -- my recollection is I may have introduced them years ago. I
14 don't know if I booked her that day, but at some point they had their own relationship.
15 So I can't recall that. I don't think I did that day, but I don't recall. But at some point,
16 he started having her on the show himself.

17 Q So on that show, there was some discussion with retired General McInerney
18 about the election possibly being stolen and a discussion of something called Hammer
19 and Scorecard, which the retired general described as some sort of software that could
20 change or manipulate votes.

21 Do you recall any of that portion of the podcast?

22 A No, I don't recall that.

23 Q Did you have any discussions with Mr. Bannon at any point, either before or
24 after the show, regarding retired General McInerney's allegations?

25 A The only thing I can recall -- and I don't know -- I can't recall if it was with

1 him or not -- is that he was crazy. Sorry. Sorry. I should be more direct. That he
2 was not --

3 Q Not not crazy?

4 A Sorry, I should be more specific. That's not a nice word to use. That it
5 was -- whatever he was saying, some people didn't think was correct at some point. I
6 mean, people have opinions and whatnot and whatever, but at some point that -- this is
7 just what I recall, and I don't remember when, but that he was -- that some of the things
8 he was saying were out there.

9 Q And you said some people felt that way. I was asking specifically about Mr.
10 Bannon's views. Did he share the view that Mr. McInerney, retired General McInerney's
11 views were out there or not correct?

12 A I don't recall, but I think that he texted that once to me maybe, maybe, or
13 somebody else did. I can't recall, but it sounds familiar. It's something like that.

14 Q Ms. Powell was also on that show and sort of later raising some of the same
15 types of claims that retired General McInerney had raised. Do you remember -- are you
16 aware of that? I guess start with that.

17 A I don't recall stuff that she was saying. Yeah.

18 Q Do you ever recall a discussion with Mr. Bannon regarding Ms. Powell's
19 allegations and whether he thought those were out there or maybe not correct?

20 A I don't recall. Is the Hammer and -- is that Dominion?

21 Q So my understanding what the retired general was saying on the show was
22 that there was a CIA program that had been developed years ago, that during the Obama
23 administration it had been sort of modified so that votes could be switched. So this
24 would be separate than Dominion machines. This is some sort of CIA operation run by a
25 guy named Dennis Montgomery. Does that sound familiar?

1 A No.

2 Q Okay. So what about the Dominion piece of it? Did you ever have
3 discussions with Mr. Bannon --

4 A The only thing --

5 Q Let me finish. Let me just finish the question here.

6 A Sorry.

7 Q That's okay.

8 -- where Mr. Bannon shared a view that he thought that the Dominion allegations
9 being raised by Ms. Powell were out there or crazy or not correct?

10 A So I don't really recall all that Sidney was talking about or really anything
11 much of what she was saying. But specifically with regards to Dominion, Steve on
12 several occasions had said that that's just not -- he said it publicly on the show, that that's
13 just not something that he was interested in. And just the feeling that I got from what
14 he was saying is that he's just not going to -- doesn't -- not going to go there about that.
15 Other people can talk about it, but that's not what he was going to talk about.

16 And we -- I happen to know the representative for Dominion for many years.
17 And Steve wanted to have the Dominion people on the show to defend against these
18 allegations. So he had asked me several times to try and get the Dominion people to
19 come on the show, with a 100 percent promise that he, like other Democrats that he had
20 had on or other people that disagree with him, that he would give them a forum to say
21 whatever they wanted. But they didn't want to do it.

22 Q Who's the Dominion rep that you had worked with?

23 A Tony Fratto.

24 Q And is he in public affairs for them?

25 A Yeah, I don't know what his exact role is, but something around that, yes.

1 Q And were you doing work with them as a client or just you had a personal
2 relationship with Tony?

3 A Yeah, just a personal relationship with Tony. He had worked on the Hill for
4 Rick Santorum, so I had known him for years.

5 Mr. [REDACTED] I should note for the record that Ms. Lofgren has joined the
6 interview.

7 BY MR. [REDACTED]

8 Q Ms. Preate, in these conversations with Mr. Bannon about getting Dominion
9 on the show, did he express the view that he wanted them to have an opportunity to
10 respond or that -- just generally, or did he seem to share the view that the allegations
11 were not well-founded and he wanted to somehow, you know, put them to bed or
12 otherwise sort of change the narrative?

13 A I don't recall, but he was -- he just wanted to give them -- my recollection is
14 he just wanted to give them a fair -- a chance, a fair chance to answer that, that people
15 just to be able to hear two sides. But I don't know -- I can't remember more details than
16 that, but that's what I recall.

17 Q So -- and this is sort of maybe a nuanced point, but on this issue of the voting
18 machines, I have -- you mentioned him talking about them on the shows. I've heard Mr.
19 Bannon on the shows talking about, from a strategic standpoint, focusing on the
20 machines probably isn't the best approach. And he's talked about things like it would
21 take too long or it's, you know, very technical. And so he had different ideas, which
22 we'll talk about in a bit, about how best to overturn the election.

23 Am I characterizing that generally correctly?

24 A I'm not sure. I mean, I haven't gone back to listen to the show, so your
25 recollection is probably better than mine about that.

1 Q Okay. Well, and what I'm driving towards and my question is, whether the
2 concerns that he raised with you about these allegations about the Dominion machines,
3 was it your understanding that they were based on the fact that the allegations just
4 weren't -- there was no evidence to back them up or they weren't that strong, or just that
5 it would take time and maybe strategically wasn't the best path to take?

6 A You know, it was a long time ago, and I -- so just my recollection is just that
7 he thought it was fair to have somebody else, if they're being talked about, to have an
8 opportunity to answer the questions, and that he would -- he would give them a platform
9 for as long as they wanted to talk about it.

10 Q But you had also said previously that you didn't think he gave much sort of
11 credence to those allegations. Did I understand you correctly?

12 A I think that was more of I didn't understand what the General McInerney
13 was talking about versus the Dominion. My recollection is that he just was not -- he
14 didn't want to go there, and I forget -- or maybe he didn't even say why it was, but he
15 wanted to give, you know, Tony Fratto the -- he wanted to give, pardon me, the Dominion
16 people a chance to say. Whether it was -- whether it took too much time or was too
17 complicated or something else, it might have been those things, but it was more like do
18 they -- I'll let them come on and if they want to talk about this, you know, they can.

19 Q So one last set of questions on the notion of what was going on before the
20 election and belief about possible theft of the election before it even took place.

21 Do you remember any discussions with Mr. Bannon about whether there would
22 be this -- it's been referred to as sort of the "red mirage." I think that it would look as if
23 Trump was -- that the early returns would show that Trump was winning on election
24 night, but then that might change over time.

25 Do you remember having any discussions with him about that?

1 A I don't recall ever hearing that term, so I'm not sure exactly what you mean.
2 You mean some people have said -- well, do you mean some people have said that at
3 nighttime he was winning and then he was losing?

4 Q So there were people who were saying -- in fact, the guests on that show on
5 the 2nd were saying this -- that on election night, the early returns as they're coming in
6 will show Trump in the lead, but then absentee ballots and other, you know, later counts
7 would maybe shift the results or would indicate that Trump's lead was either diminishing
8 or would be overtaken.

9 A Right.

10 Q Do you remember any discussions about that before the election?

11 A I don't, no. You know, he may have, but it's not ringing a bell, but he may
12 have, you know. But I don't recall that. I don't recall that.

13 Q Okay.

14 A And I don't know if I recall him saying that on the show either.

15 Q Do you recall thinking that or knowing that personally, that that was
16 something that might happen on election night, that the early returns might not be
17 reflective of the final result?

18 A You know, I grew up in politics, as I mentioned. My mother's a Democrat
19 and loves Joe Biden. My dad's a Republican. So I have my own opinions about -- from
20 what I've seen since I was a kid on elections. So, you know, I don't -- it used to be
21 traditionally that when you had the old machines, that the cities would come in first and
22 the outlying counties would come in later.

23 So I don't really -- so -- and then it started changing, of course, because the
24 electronic voting didn't come in maybe at the same time and whatnot, whatever. And
25 then absentee ballots. So I don't really remember having a conversation with him about

1 that. I mean, I would assume that it was covered on the show, I guess, that people were
2 talking about when votes come in, that sort of thing.

3 Mr. [REDACTED] Okay. Let me take a break for a moment here and ask whether
4 anyone else, Ms. Lofgren I think is still with us, whether she has any questions, [REDACTED],
5 whether you have any questions, and then I think we'll take a short break.

6 No?

7 Okay. Seeing no hands, why don't we take a short break, Ms. Preate.

8 Joe, do you have a sense of -- do you want to just take 5 minutes or do you need
9 longer than that?

10 Mr. Jay. So I would keep going because I've go to take --

11 Mr. [REDACTED] Oh, you've got your noon, don't you?

12 Mr. Jay. Yeah.

13 Mr. [REDACTED] So let's go for a few more minutes and we'll break in about 10 more
14 minutes, and then, Joe, you can take care of your business at noon.

15 Mr. Jay. That'd be great. And thank you for accommodating.

16 Mr. [REDACTED] Okay.

17 BY MR. [REDACTED]

18 Q So I want to talk a little bit about election night. Were you in Washington
19 on election night? I think you said you were in Scranton the day before.

20 A I was. I think -- isn't that terrible. I don't remember. I mean, I think -- I
21 was with -- on election night I was, I think, yeah, in Scranton, I think.

22 Q Do you know if Mr. Bannon was in Washington?

23 A I forget. I think so. Wait. Election night. Wait.

24 He had one election night party. Was that 2018 or -- or a watch thing. I think
25 that was 2018. And then 2020 was nothing, I think.

1 Q Do you know whether he was at the White House on election night?

2 A No, I don't recall.

3 Q Do you know whether he was in touch with the President on election night?

4 A I don't recall.

5 Q Do you know whether he was involved in any discussions with the President
6 or his advisers as to what the President should say publicly on election night?

7 A Can you say that one more time? Do I know --

8 Q Whether Mr. Bannon was in discussions with the President or his advisers
9 about whether the President should say something publicly on election night.

10 A No, I don't recall, huh-uh. I'm just going back to thinking where was I
11 election night. Isn't that ridiculous? I -- yeah. I was in Pennsylvania for the rally.
12 Yeah, sorry.

13 Q And the reason I'm asking these questions is you may recall there
14 was -- there was some question as to the election wasn't called immediately after the
15 polls closed, right? And there was some question as to whether States should be called
16 for the President. I think FOX famously called Arizona for the President, and there was
17 some concern about that. And there was discussion about whether the President
18 should come out and speak, and he eventually did come out and speak in the early, early
19 hours of Wednesday morning.

20 And so that's to sort of give you some context. I'm wondering whether you
21 recall Mr. Bannon ever sharing with you that he'd been part of the discussions with the
22 President or others in his circle about whether the President should speak on that night.

23 A I don't recall. Sorry about that.

24 Q In subsequent days, Mr. Bannon said on his podcast that the President
25 should have gone on TV at 10 o'clock on election night and claimed his victory.

1 Do you know whether he ever said that to the President?

2 A I don't recall. I mean, as I said earlier, I -- you know, I'm not certain all the
3 times he spoke to the President. I don't know what they -- most of the time, I -- I don't
4 recall what -- him telling me what they talked about and if they -- even if and when they
5 talked, except a few times that I -- he -- that was very private. So I don't know.

6 Q It seemed that he was fairly -- "he" being Mr. Bannon -- was fairly public
7 about this sort of idea that the President shouldn't concede, he shouldn't have -- you
8 know, he should have just said he won and so forth.

9 And I'm just wondering whether Mr. Bannon ever told you that he thought that
10 was the right -- that that's how the President should have handled it.

11 A I recall Steve -- I recall him saying something about what the President
12 should do. What time it was and when it was, you know, I don't. I mean -- so my
13 expertise for him should be focused on a certain reporter, what their deadline is and all
14 that stuff. And there's always literally so much incoming. And then I have other clients
15 as well.

16 And then sometimes, since I am a political person, I have my own views
17 about -- you know. I grew up in politics. I have my own views about the way things go
18 and the way things happen. And so I do recall that at some point he was saying what
19 the President should do. I don't recall what time and what day and all that stuff.

20 Q At some point after the election, did Mr. Bannon become involved in any
21 efforts to change the outcome of the election, to your knowledge?

22 A What do you mean?

23 Q Well, other than just saying -- talking about things on the show and having
24 guests on the show, was he involved in strategizing, for example, with the President or his
25 advisers regarding how best to change the outcome of the election?

1 A I don't really know what he -- I don't really know what he was doing. I
2 mean, there's -- you know, whatever he says on the show was out there, but I don't really
3 know what he was telling the President.

4 Q Do you know that he was having discussions with the President in terms of
5 advice or strategy?

6 A I know they were talking. I don't know anything more than that, really,
7 that I recall. Again, he doesn't -- we don't have that type of relationship. Sometimes,
8 you know, he would say something, but, oh, I told this person this and such and this
9 person that and such. But I don't really remember and I don't really -- you know, time's
10 moving so quickly, everything -- nothing -- nothing sticks out in my brain about any of that
11 stuff, you know, other than what he says kind of like on the show.

12 And -- and, frankly, I mean, I don't even know if he -- what he would tell the
13 President and, you know, is the President -- you know, is he saying the same things that
14 are on the show? I don't know.

15 Q Well, you do know that he was working on issues outside of the show --

16 A Yes.

17 Q -- with the goal towards overturning the election result, right?

18 A Well, I mean, I know that he -- you know, he's talked about how he thinks
19 that Trump won. But, I mean, we don't work in the same building. I don't know
20 meetings that he -- most of the time I don't know who he's meeting. I don't -- I live in
21 another place. So I don't really -- it's not like, you know, you sit next to each other and I
22 share a desk. So if someone walks in, you say, oh, so-and-so, and come join a meeting.
23 I mean, I don't -- we weren't in the same place.

24 Q But you knew he was working, for example, with Mr. Giuliani on Mr.
25 Giuliani's efforts, correct?

1 A Yes. I mean, he would come -- I mean, I don't know what the
2 mayor's -- you know, what he was doing, you know, every day, but he would come on the
3 show and talk about it, sure, and they would talk about it.

4 Q I'm talking about outside the show. He was working with Mr. Giuliani
5 outside the show, wasn't he?

6 A So that's not really like -- I've read some stories since and I've learned more
7 in the news than I have what I knew myself. So I don't really know what -- what they
8 were doing. I mean, they were clearly, you know, talking about -- about -- talking about
9 how it was stolen. And Mr. Giuliani had the -- had, you know, talked about it on his
10 show. And they clearly both agreed on this. And so did Bernie Kerik, or some variation
11 of that. But their personal conversations I didn't really know much about. And what
12 the -- some of the day-to-day stuff they were doing, I'm not -- you know, I'm not sure.

13 Q Well, you shared with us an invitation that either you or Mr. Bannon or
14 somebody working on his behalf drafted for, for example, a meeting with legislators,
15 State legislators on January 2nd. You were aware that Mr. Bannon was involved in that
16 effort, correct?

17 A Yes. And I can't remember now if Rudy was involved in that or not. I
18 can't remember. The mayor, excuse me. But this gentleman and Mark Serrano had
19 drafted it. I don't know the genesis of all of that sort of thing. And my recollection of
20 it was that he, you know -- I don't remember the details, but they were going to present
21 what they thought was evidence. That's what I recall of it.

22 Mr. ██████ Okay. Why don't we -- it's almost noon. Let's go off the record.

23 Ms. Preate. Okay.

24 Mr. ██████ And let's take a break.

25 [Recess.]

1

2 [12:24 p.m.]

3 Mr. [REDACTED] Okay. Let's go back on the record.

4 BY MR [REDACTED]

5 Q All right. Ms. Preate, when we left off, we were talking about Mr. Bannon's
6 interactions with Mr. Giuliani. You had interactions with Rudy Giuliani between
7 November 3rd and December -- and January 6th. Is that right?

8 A I believe so.

9 Q What was -- can you just generally describe the nature of those interactions?
10 For example, did you see him face-to-face? Did you have phone conversations? How
11 were you interacting with Mr. Giuliani in that time frame?

12 A I don't recall exactly, but from what I believe was, it was only via text.
13 That's what I recall.

14 Q Did you ever meet him face-to-face?

15 A Yeah, I have. You know, I won't say 100 times, but, you know, I've lived in
16 New York City, so I met him in New York City, and I'd see him from time to time. And
17 then I have seen him from time to time. I mean, I could go back and look, but I don't
18 recall seeing him in that time frame, but I can go back and -- go back and look.

19 Q Do you remember ever sitting in a meeting with him, for example?

20 A In my lifetime or --

21 Q No. In that time frame.

22 A I don't think so. Not that I recall. The time was what time?

23 Q From the election until January 6th.

24 A Oh, from the election on. Maybe. Maybe. Are you referring to, like,
25 their meeting at the Willard? Is that what you mean or --

1 Q Any meetings. Any time where you had a face-to-face interaction with him
2 between the election and January 6th.

3 A I don't remember. And if, you know, if the question that you're asking is,
4 like, was I sitting in a strategy session and whatever, not that I recall.

5 Q Did you see -- did you go to the Willard around the time of the 6th -- or did
6 you stay at the Willard?

7 A I did. So I stayed at the Willard on Wednesday -- or sorry -- I mean, on
8 the -- on the 5th and the 6th. So the -- I just remember going to the Willard, and I
9 walked into a room and there were Rudy and Boris were, I think, taping a radio show.
10 And then I was like, Oh. Then I just left.

11 And then there was another group of people and, like, just had the television on,
12 and I think maybe he came in, I don't know. But I remember it was another room, and
13 Bernie Kerik was there. But I think maybe Rudy -- the Pres- -- Mr. Giuliani came in, but I
14 don't recall. But I remember Bernie Kerik was there.

15 Q Okay. And we're going to talk more about the 6th in as much detail as can
16 you remember --

17 A Okay.

18 Q -- in a little bit. Did you ever -- it doesn't sound like this was the case, given
19 your answers this morning, but were you ever on a phone conversation, a conference call,
20 with Mr. Giuliani and Mr. Bannon, in which they were talking about the election?

21 And I'm going to put to the side for a minute this video conference on January 2nd
22 that I think we're going to talk about.

23 A Yeah.

24 Q But put that one to the side.

25 A So let me -- because I thought about this on break. So just for your -- which

1 is boring because, you know, you don't -- everybody's busy there. It doesn't matter
2 about my life, but just so you know what -- you know, I have anywhere from, like, 7 to 12
3 clients at a time. I only have a few subcontractors that are working for me.

4 Like, I just hosted a dinner the other night for a client with people in, you know, in
5 finance and whatever. And I have to get, like, 50 people in the room. And so, I need to
6 remember where everybody's sitting. I need -- I mean, this sounds dum-dum, right?
7 There's people that are saving the world. I don't -- I'm not trying to say it's important.

8 But I've got to email each one of those people, got to make sure they show up on
9 time, got to make sure they're happy. I've got to seat them. Afterwards, got to thank
10 them. I've got to hang out with them, whatever. So I'm doing all of this at the same
11 time, or some variation of that, while I'm working with Steve.

12 So each person -- each client's important and I don't -- don't mean that, but I'm
13 balancing a lot of things, and certainly me personally, just me, I had a feeling that the
14 President -- President Trump was going to lose sometime in -- before the election, like
15 months and months and months.

16 I have my own opinions, and they're not -- I don't represent anybody else, but, you
17 know, my own opinions. And so, while you have a conversation with somebody about
18 something, we -- and, you know, and I still may be convicted in my own thoughts. And
19 no -- I had no idea what would happen on January 6th.

20 So you're worried about all of your life before that, thinking, I've got to pay my
21 bills, I've got to do my invoices, I have this dinner, I got to do this, [REDACTED]
22 [REDACTED] all of these things.

23 So I'm trying to -- Steve is doing what he's doing, but I'm not in the room with him,
24 and I don't work next to him. We don't share an office, so. And it's still -- again, it's,
25 like, 2 years ago, so I don't know if that's helpful to understand, you know, my

1 recollection or my beliefs in what happened.

2 Q Yeah. And I understand all that, and it's actually -- you know, and if you
3 remember at the beginning this morning, I told you, we're going to be asking you a fair
4 amount about --

5 A Yeah.

6 Q -- Mr. Bannon and what he thought and what he knew. And if you don't
7 know, then, you know, that's okay, because -- for all the reasons you've mentioned and
8 he's also --

9 A Right.

10 Q -- you know, you guys aren't joined at hip.

11 A Yeah. And I appreciate that. You know, thank you so much.

12 Q So totally get that. Totally get it.

13 A Yes.

14 Q I was a little surprised, though, to the extent that -- I mean, you did know
15 that he was working -- working -- he was making efforts outside of his show to try and
16 move the President's agenda along in terms of the election?

17 A So the way -- the way you just said that, so having the general thing, I agree
18 with -- or, you know, I -- that's -- so if I gave the impression, you know, I'm just trying to
19 be very precise and ask you -- answer exactly what you're asking me so that I don't, you
20 know -- so I know exactly what you're saying.

21 But, yeah, in general, for instance, like, I make the general assumption right now
22 that, you know, he's still talking about the pandemic. So he may be, you know, talking
23 to people in meetings about the pandemic, and is it going to come back? Is it raging in
24 China?

25 And, you know, he still cares about obviously the CCP. I'm making the

1 assumption right now that he's probably talking to people about China.

2 So, you know, I'm trying to answer very specifically, like, the phone call -- the call,
3 obviously he was involved in that. The genesis of that, I'm not sure exactly.

4 Q Okay. Well, but just -- and I don't want to spend too much time on this,
5 because we want to get to the specifics. But I want you to understand where I'm
6 coming from, the perspective here, is that we're very interested in understanding who
7 was working to try to overturn the election, who they were working with, what their
8 strategies were, what they were pursuing. Okay? And Mr. Bannon, on his podcast, has
9 talked about certain strategies.

10 A Right. Absolutely.

11 Q We can see the podcast. You were there for some of the podcasts. You
12 know it's there.

13 A Yes.

14 Q What we're really interested in -- or one of the things we're really interested
15 in today is having you give us some context of what was happening outside the podcast.

16 A Yes.

17 Q And we do see text messages between you and Boris Epshteyn and Maria
18 Ryan, which we're going to talk about, Johnny McEntee, that reflect that Mr. Bannon is
19 playing some role behind the scenes when he's not in front of the microphone -- or in
20 front of the camera.

21 A Right. Right.

22 Q Okay. So that's what I really want to try and explore with you if we can.

23 A Okay. Well, look, absolutely generally he supported the President's
24 agenda, and they were focused on this election issue, whether you call it overturning or
25 election integrity issues or -- et cetera. Absolutely. Yeah.

1 Q Okay. So let's get down -- let's talk about some of the specifics. So if we
2 could bring up exhibit 18, this is a text message with Maria Ryan. Can you explain how
3 you got in touch with Maria Ryan, how you came to know her? And we'll work on
4 getting that so it's a little larger for you --

5 A Okay.

6 Q -- and if you're having trouble with your screen, I can probably help you --

7 A Okay.

8 Q -- get it zoomed in or out. But why don't you tell me how you knew -- how
9 you came to know Ms. Ryan.

10 A Through Steve.

11 Is it -- should I open my screen, or is it they are doing this? Is it them?

12 Q No. You won't be able to do anything other than just look at it.

13 A Oh, okay.

14 Q But can you read it?

15 A Yeah. So Steve is calling and no answer. He is on.

16 Q Okay. I don't need you to read it. I just want to make sure you're able to
17 read it.

18 A Sorry. Yep. I can, yep.

19 Q Okay. So Steve introduced you to -- is it Dr. Ryan?

20 A Correct.

21 Q And when was that, roughly?

22 A I don't -- I don't recall, but he did introduce me to her. I believe it was him,
23 I think. I don't -- or maybe it was the mayor, but yeah. But she was someone that he'd
24 ask me to reach out to.

25 Q Do you remember roughly what time frame? After the election?

1 A I don't -- I don't recall when that was exactly, but it looks like November
2 11th, so, yeah, it would've been after the election, I guess. I don't remember exactly
3 when --

4 Q Okay.

5 A -- was the first time that I talked to her.

6 Q What's your understanding of her connection to Mayor Giuliani?

7 A That they host -- or they did -- I haven't -- don't -- haven't in the last couple
8 months, but they did or do have still a radio show, and they are very good friends. And
9 maybe they are partners, you know, personally, but -- I think. I don't know exactly, but I
10 think so.

11 Q Do you know whether she played any role in the election integrity efforts
12 that you've described?

13 A I'm not certain. I can't remember. I mean, my feeling is that they work
14 together, but she also had another job, so I'm not sure how she spent her time exactly.

15 Q Okay. If we scroll down in this text chain a little bit and go to the
16 November 12th text at 7:46. Do you see that?

17 A Yes.

18 Q Hi Maria, I have a super smart lawyer friend who wants to help.

19 A Yes.

20 Q Do you remember why it was you were reaching out to Dr. Ryan on this?

21 A I don't remember. I mean, all I do remember is that the mayor did come to
22 Pennsylvania and did an -- did two events that I recall, maybe more. One was a hearing
23 and then one was another event. So it may have been for that, I don't -- I don't recall
24 what days they were, but that seems to be the plausible reason.

25 Q If we scroll down a little bit further, I think you bring up this, maybe it's even

1 the same friend again.

2 A Uh-huh.

3 Q Go down to just before the November 14th text.

4 A Uh-huh.

5 Q We've got [REDACTED] working the scrolling for us.

6 A Perfect, yeah.

7 Q Says, I have a super smart lawyer friend. Steve B has met him and thinks
8 well of him. I assume that's meant to be thinks well of him.

9 A Yes. Thank you. Yeah.

10 Q He wants to volunteer. He took a break from the law to help this election
11 cycle. Would you and the mayor want an extra pair of hands?

12 A Right.

13 Q What were you proposing that your friend help with?

14 A I mean, I -- I don't even recall who the person was. I mean, I could think
15 about it. I mean, I just assumed that what I meant by that was, again, they had the one
16 event at the -- in Philadelphia or -- sorry -- the one event -- actually, I don't remember if it
17 was in Gettysburg, or I can't remember where they had the hearing. And I forget what
18 day that was. And then they did have something -- they were in Philadelphia, doing
19 stuff there. And what I assume is, they were -- you know, election integrity stuff, but
20 I -- you know.

21 Q So you were thinking that they might need help with events, and that's who
22 you were proposing, the lawyer friend?

23 A Advance, you mean?

24 Q No. Events.

25 A Oh, no, no, no, I don't think an events person. I think it was, they were

1 going through -- this is my assumption right now when you're asking me and my
2 recollection of what was going on -- is people were saying, Oh, this happened, this
3 story -- story of this fraud, story of that fraud, and, you know, they were trying to
4 get -- see -- have people say or tell a story about what the fraud was. That's my
5 recollection.

6 So for instance, like, a friend of mine had somebody vote for his brother at least
7 twice under his name, and he doesn't even live in the State of Pennsylvania. So they
8 were looking, did people have stories or people were telling them stories about what had
9 happened to them. That's what I recall now.

10 I mean, I don't remember writing that text specifically, but, you know, that's what
11 I recall, generally speaking, that was happening.

12 Q And you understood that Mayor Giuliani and Dr. Ryan were part of that
13 effort to try to uncover or discover evidence of election fraud?

14 A Well, he -- he had that -- he had the hearing in -- in Pennsylvania. I forget
15 what day that -- as I said, I forget what day --

16 Q It was November 25th.

17 A Okay. He had that hearing, and then -- and then they had something at the
18 Four Seasons, something or other, a thing that had happened, so. But they -- but I know
19 people were trying to -- there were lots of people complaining about this case of, you
20 know, some -- I went to vote and my absentee ballot -- they told me I had already voted.
21 I went to vote and they said, you know, did you get -- there was all these anecdotal cases
22 of people having issues when they went to vote.

23 And so that's what I -- that's -- an election lawyer would be able to look at the data
24 and find out what happened.

25 Q If we scroll down just a little bit to the November 14th text, you write, "Steve

1 says you have to stay, please stay." And she responds, "Thank you for caring." Do you
2 know, do you remember what that was about?

3 A I think as -- now that I read it, what I think I recall, I think that maybe -- that
4 they had, you know, a disagreement or something like that, not -- I think that was a
5 personal text message about the two of them getting -- you know, it was a personal text
6 message about somebody saying, you know, does he love -- does he want to marry me or
7 not marry me, or something like that, you know.

8 I pulled the text messages for the timeline that you wanted. So I do recall that
9 they had had, like, you know, like, normal people, everybody has a little fight or
10 something like that and so.

11 Q I see. Okay. And Steve thought it was important for you to reach out for
12 her?

13 A I -- I can't remember. That was so long ago. But I do remember, like,
14 they, like, once had -- and I wouldn't have remembered probably unless you just told me,
15 but they -- there was one -- some argument, like, you know, it's just personal. But I just
16 put it in there so that you could see, you know --

17 Q I understand.

18 A Yeah.

19 Q Okay. Let's scroll down to the November 16th text.

20 A Okay.

21 Q It's at November 16th at 11:22. That's on page 422. Okay. Do you see
22 that at the top of the screen there?

23 A Yes.

24 Q The part I want to ask you about is your reference to -- well, it's her
25 reference. Excuse me. Dr. Ryan says, "There's a lot of in-fighting with the lawyers, and

1 I've got everybody calm right now."

2 And then later in the discussion you say, "Steve says hello, he wanted to know
3 about the in-fighting," and Dr. Ryan says, "Catch you up in a little bit." Do you
4 remember this discussion?

5 A I don't remember that discussion. What I remember --

6 Q Sorry.

7 A Yeah, I don't remember that discussion. I do remember just broadly -- and
8 I think this has been reported in news stories -- about which lawyer was doing the best for
9 the President -- President Trump, that is, at the time, and that there was in-fighting and
10 who was doing what.

11 Q Do you remember getting any information from Dr. Ryan about what the
12 issues were about from her perspective?

13 A I don't remember.

14 Q Okay. Do you know if Mr. Bannon was in frequent contact with Mr. Giuliani
15 during this time frame, November and December of 2020?

16 A Do I know if Steve was talking to the mayor?

17 Q Yes. On a regular basis.

18 A I don't know what -- I don't recall what Steve -- who Steve was talking to.
19 And, again, I -- you know, he's -- I'm not even there with him, so. I don't know how
20 often they talked.

21 Q Okay. If I -- if I told you that there were over 100 phone calls between
22 them between the election and January 6th, would that surprise you?

23 A I don't know. I mean, I don't -- I mean, again, you know, I'm not in the
24 same place. I mean, I don't -- I don't know. I mean, would it --

25 Q Okay.

1 A -- I guess -- I guess it's a lot -- is it a lot, I don't know, from -- I mean,
2 obviously, look, he's on the show. I can't remember how long -- you know, how
3 many -- how often he was on, but he was on the show, so.

4 Q And do you know in that time frame, outside of the context of the show,
5 whether Mr. Bannon was, say, strategizing with Mr. Giuliani about ways to challenge the
6 results of the election?

7 A You know, again, I'm not in -- like, just for instance, I have no idea what he's
8 doing right now. And I don't know what he -- I don't know what they were doing, so.
9 Okay, can you ask me the question again? I'll try and be more specific here.

10 Q Yeah. Just whether you know whether during this time frame, November
11 and December of 2020, Mr. Bannon was strategizing with Mr. Giuliani about how they
12 might challenge the results of the election.

13 A I don't -- I don't know. I mean, I assume that they would be. They were
14 on the show talking about it.

15 Q But for example -- and I'm not putting words in your mouth, and if you don't
16 recall this or if it didn't happen, then just tell me. But did Mr. Bannon ever say to you, I
17 had a great call with Rudy, we've come up with a new approach? Or, I talked to Rudy,
18 and I think he's going in the wrong direction, and I told him he needs to not focus on the
19 machines but focus on dead voters? Or anything along those lines?

20 A You know, that's really not the way a lot of the time we talk. So I'm
21 not -- it's not that -- it's not that, by the way, he might not have said that, but I'm not -- I
22 keep -- as you can see in some of the text messages, I could say the Lombardi quote, and
23 you could see what the response is or whatever.

24 So I just don't know, minute by minute, what they were doing or what they were
25 talking about, so.

1 Q Okay. And I'm not asking for a minute-by-minute, and I'm not going to sort
2 of -- you're not his minder.

3 A Okay.

4 Q And I'm not looking for you to tell us everything he was doing, but just
5 whether, in the course of those 2 months, he ever told you or suggested to you that he
6 was working with Rudy Giuliani outside of their appearances on the show?

7 A By the way, I mean, I don't mind your asking me and your -- I don't mean no
8 disrespect, but I just don't -- you have to ask the mayor. And I know Steve is not
9 complying, but I just am not -- I just don't recall. I mean, I'm -- he's -- I've got to do my
10 work for him so I can get the money to pay my rent. And I have these other clients.

11 I mean, he was on the show, and it looked like, you know, on the show that they
12 were working toward the President's agenda, and part of that was whether the election
13 was stolen or not. So from the moment by moment, or even -- I just don't recall, and I
14 don't really know what all they were doing. I wasn't there.

15 Q Okay. Okay. Fair enough. And, again, I don't want you to have to
16 account for all of his minute-by-minute actions, but --

17 A And I just want to say I'm happy -- I have my own opinions. I'm very happy
18 to comply. I mean, not very happy. I'm happy to comply, you know, so I don't mind.
19 I just -- this is just not stuff that I know or recall knowing.

20 Q Fair enough. Fair enough. Mr. Bannon, shortly after the election, maybe
21 even the day after, started talking on the show about there being -- having been massive
22 voter fraud. Did he, outside of what he said on the show, did he ever share with you
23 what he believed that massive voter fraud to be?

24 A I don't recall specifically, but -- I know we'll talk about this at some point,
25 but, like, the January 2nd -- that group phone call, a lot of people thought there was a

1 high -- there was a large amount of anecdotal evidence of cases spread out everywhere.

2 Whether it was enough to overturn or not, I mean, at least in Pennsylvania, a lot
3 of people think there wasn't. So -- but a lot of people were very upset about it or
4 concerned. So I -- in terms of Steve, I don't recall having exact conversations with him
5 about -- I don't -- I just don't recall because it was so long ago and whatever, but, you
6 know, whatever he said on the show is what I'm sure he believed.

7 Q All right. Let's bring up exhibit 23, and this is a text message or text
8 exchange you had with Bernie Kerik.

9 A Yeah.

10 Q Actually, it looks like it's one way here. I don't know if Mr. Kerik responded
11 to the text --

12 A Yeah.

13 Q -- on November 7th. And you introduced yourself --

14 A Yes.

15 Q -- right, made a connection. You said, I was on the car -- maybe it meant to
16 be call -- we just had right now with Sidney and Steve Hantler. Do you see that?

17 A Yep.

18 Q And then you raised a question about fraud in Pennsylvania. It may be one
19 of the things you talked about with us today.

20 A Yes.

21 Q First of all, do you remember a call with -- is that Sidney Powell?

22 A Yes. Well, I assume it is, yeah. I'm not -- she's the only Sidney that makes
23 sense, yes.

24 Q And who's Steve Hantler?

25 A He's a guy that cares about politics, is active in politics.

1 Q Do you remember being on a call with them shortly after the election in
2 which election fraud issues came up?

3 A I don't remember that call, but, you know, there's -- you know, I've talked
4 to -- I've talked to Sidney before, I've talked to Steve Hantler before, many times
5 throughout the years, so.

6 There was -- there was a case that I know that my friend's brother had somebody
7 vote for him at least twice, in two different locations. And he knows -- they know it's
8 fraud, and they think maybe it was more than that, and that this person that was doing it
9 was doing it multiple times throughout this area.

10 And then there was this other case of two other people, these two teachers that
11 went to vote, and they were told, basically, like, you can't vote. And so they were
12 asking -- there was an effort, people would say, who can I tell about what happened to
13 me? Or who can I tell about what's going on? And that's, generally speaking, what I
14 think I was probably referring to.

15 Q And did someone tell you that the right person to get the information to was
16 Bernie Kerik?

17 A I can't remember, but I would make that assumption by reading this text,
18 you know. And he's been on Steve's show.

19 Q Do you remember if he ever followed up with you on this information?

20 A I kind of think he didn't, but I can't remember.

21 Q Right after the election, Mr. Bannon said on the podcast, "It's incumbent
22 upon us today to take dramatic and bold action." This is in connection with the massive
23 voter fraud that he believed had taken place. Do you know what he meant by that, or
24 did he ever talk with you off the show about what he meant by that?

25 A Wait. Say that -- say that one more time. What did he say again --

1 Q It is incumbent -- it is incumbent upon us today --

2 A -- on the show?

3 Q -- to take dramatic and bold action. This is in response to massive voter
4 fraud.

5 A Uh-huh.

6 Q Did he ever talk to you about that offline, meaning not on the podcast, about
7 what action he thought needed to be taken?

8 A I don't -- I don't know what he -- what specifically without, you know,
9 watching that clip. I mean, you know, he never -- I mean, he never suggested ever doing
10 anything, you know, violent or anything like that, no. I mean, I don't -- I don't -- I
11 assume he just meant the President's agenda of finding out what happened and, you
12 know, like, having people go to hearings and tell their story.

13 Q Let's take a look at exhibit 35 [REDACTED] And I'm going to -- this is an
14 email -- we didn't get this one from you, but it looks like it's an email that you sent to
15 yourself with some BCCs maybe. Is that something that you do sometimes to sort of
16 send out group emails? You'll make it to and from yourself but then blind copy a bunch
17 of folks?

18 A Sometimes I do that for, like, someone I know is going to do a radio show,
19 but I also sometimes send my own -- myself messages just so I take notes through my
20 email. So I'm not sure what it is, but.

21 Mr. [REDACTED] Okay. [REDACTED] are you able to get 35 up there for us?

22 Mr. [REDACTED] Sorry. I'm looking for it.

23 BY MR. [REDACTED]

24 Q While he's looking for it, I'm going to tell you it's a -- there was an interview
25 that Mr. Bannon did with Maria Bartiromo on Fox in which he talks about what he called

1 multiple paths to inauguration and laid out steps that should be taken. Do you
2 remember that?

3 A I don't -- I don't remember that, but I've -- I, even to this day, do that for
4 friends who they have a radio show, and I sent it to a group of people.

5 Q What do you mean, send it -- send what to a group of people?

6 A Oh, I just, you know -- you know, Sean Hannity show, interview with Eric
7 Metaxas, and then I send it.

8 Q Okay. So this is -- and sorry, the header there is kind of blocking some of
9 the text.

10 A I got it. Yeah.

11 Q So this is from you to yourself.

12 A Yeah.

13 Q This is a blind copy to someone named [REDACTED] --

14 A Yep.

15 Q -- [REDACTED]. Do you know who that is?

16 A I assume, now that you're -- I'm looking at it and knowing the context, it's
17 probably Dustin Stockton probably.

18 Q Do you know who else you may have sent this video to?

19 A So what I would do in terms of the PR effort, for not just Steve but for other
20 clients is, I'll send out to my list, which usually is made up of other media people, other,
21 you know, policy people, political people, and then just send out, like, interviews. I do it
22 for my other clients or friends as well.

23 Q And how would you get the -- do you know who was on the distribution list
24 for this particular blast?

25 A I don't. I mean, I can go back and look. You create a standard list, and

1 then you just hit send, like, and I haven't -- I haven't sent one of those out for a long time
2 to that list. I'm not sure which list it was, but.

3 Q Got it. Do you remember this particular interview, the Maria Bartiromo
4 interview, and the paths to be inaugurated?

5 A I -- I remember him being on Maria but -- you know, several times. I don't
6 remember exactly the details, but I -- I would work to set those interviews up with Maria
7 and her team.

8 Q So I noticed in several of your text messages, you either send the link or
9 refer to this interview.

10 A Uh-huh.

11 Q And I'm not going to go through the whole thing, but it does lay out what
12 appears to be Mr. Bannon's thought process, or I'll call it a strategy -- he called it multiple
13 paths -- for Trump to have a second term after the election.

14 A Right.

15 Q And I want to ask you a little bit about some of those paths, and so I thought
16 that would be sort of a helpful sort of structure. And why don't I just sort of describe it
17 for you very -- in sort of bullet-point format.

18 A Uh-huh.

19 Q Mr. Bannon suggested that if they got a fair vote and every legal vote was
20 counted in Pennsylvania, Arizona, and Nevada, those cases would change or switch over
21 to Mr. Trump, and that would carry the election.

22 A Uh-huh.

23 Q Do you ever recall him talking about that?

24 A Well, he -- he does say that. He's said that many times on the
25 show -- count every fair, legal vote.

1 Q Yes. And then he also mentioned a different path whereby, the way he
2 referred to is, the Conservatives control the courts, including the Supreme Court. Did
3 you ever hear him talking about that being a possible path for a second Trump term?

4 A I don't remember. I mean, he may have. I don't know if he said it on the
5 show. I don't -- I don't remember the contents of all of the -- of which he said to Maria
6 Bartiromo. But he may have said that, sure. I just don't remember.

7 Q And a third path was, he said, we control the State legislatures. Did he ever
8 talk with you about what that meant and how State legislatures might be able to change
9 the outcome of the election?

10 A You know, I don't -- that's not my, like, area of expertise, so I don't, you
11 know, I -- I'm more focused on, you know, is he going to do the show in studio, is it not
12 going to be in studio, what time does he have to show up, how long is the hit, all that sort
13 of stuff.

14 I just don't recall that, but -- you know, we had the January call. At some point
15 he asked me to help on that, and I don't remember exactly when that was, but that was
16 with legislators.

17 Q Let's talk about that one. What do you recall being the purpose of that
18 January 2nd call?

19 A So this is just my recollection, and so I don't really remember exactly details,
20 but the recollection -- my recollection was, is that there are cases of fraud and they
21 wanted to explain that.

22 Q Did you have an understanding of what the State legislatures were supposed
23 to do once they heard this evidence of fraud that was being presented?

24 A I don't -- again, I don't remember all the details. I'm more familiar about,
25 like, Pennsylvania, than other places. You know, everybody's State constitutions are

1 different, so I don't remember exactly what it is.

2 Q Were you ever made aware of a particular legal theory, or a strategy that
3 involved State legislatures overturning the popular vote or the results of the popular vote
4 in their State?

5 A You know, it's just not something that -- I have my own opinions on what I
6 thought happened. So while I would be a connector and I'd facilitate a connection
7 to -- you know, they could talk about things that I -- I don't recall right now, but that I
8 don't even necessarily agree with.

9 I mean, I think it's worthwhile having a conversation about -- literally, just even
10 having a hearing or having a conversation about what actually happened.

11 And by the way, that might be fraud by Republicans just as much as it might be
12 fraud by Democrats. So, you know, I think that's worthwhile to happen, but you know,
13 the people can disagree on what -- you know, I don't really remember exactly, so.

14 Q Yeah. I guess I'm asking whether you remember a discussion in which a
15 theory whereby a State legislature could overturn the popular vote, was discussed?

16 A I don't remember, but it very well could have been, you know, I just -- I
17 remember that day when the conference call happened, and I was at a theme park with
18 my nephews, so. And they're always yelling at me, Auntie, stop looking at your phone,
19 Auntie, pay attention to us. But, you know, it was set, not by me, the time, so I don't
20 remember even all what went on in the call.

21 Q Do you remember, for example, have you ever heard of an individual by the
22 name of John Eastman -- a lawyer named John Eastman?

23 A Yes. Yes, I do. Yep.

24 Q Do you remember Mr. Eastman having some -- or having some theories or
25 ideas as to the role that State legislatures might play in the election?

1 A Yeah. I mean, I don't really -- I didn't really track that. I know he did, and
2 I know he was on the show many times.

3 Q Other than his appearances on the show, do you know what level of
4 interaction Mr. Bannon had with Professor Eastman?

5 A I don't know. I mean, obviously they seemed to agree, but I don't even
6 remember what his theories were, and, you know, I'm not really sure.

7 Q Do you know whether Mr. Bannon was interacting with other attorneys
8 regarding theories of challenging the election? And I'll give you a couple of names.
9 Someone by the name of Phil Klein?

10 A I remember Phil Klein. I don't know what -- you know, how they
11 interacted, but I remember Phil Klein.

12 Q What do you remember about Phil Klein?

13 A He was on the show and -- I'm pretty sure but I can't remember -- that he
14 was on that legislator call.

15 Q How about Brian Kennedy, is that a name you recognize?

16 A Yep.

17 Q Do you remember about Mr. Kennedy?

18 A He used to be at the Claremont Institute, and I know him. I don't really
19 know John Eastman at all, but I do know Brian. He's a very nice guy. I'm not exactly
20 sure -- I know he's very -- he's very focused on China and the Chinese Communist Party
21 and fighting them. And I don't really know too much after that.

22 Q Did you ever have any discussions with Mr. Kennedy about the 2020
23 election?

24 A I may have. He's not one of the names I looked for. I tried to go through
25 that. You know, I was using the search mechanisms that you guys had sent. But I

1 mean, I think, you know, that he was on the show, saying whatever he thought.

2 Q How about an organization called CNP Action, have you ever heard of it?

3 A Yes. Well, I know CNP. I don't know what their formal full title is, yes.

4 Q What is CNP?

5 A It's a conservative group that meets, like, twice a year, I think. I think. Or
6 once or twice a year. But I don't know with the COVID, but yeah.

7 Q Do you know what Mr. Bannon's connection or involvement has been with
8 CNP?

9 A I think maybe he spoke there once. I'm not really sure. I can't remember.
10 But I knew CNP outside of Steve. I, you know, know lots of conservatives just outside of
11 Steve. That's how I know of CNP.

12 Q Do you know what, if anything, CNP or CNP Action was doing in connection
13 with trying to address election integrity claims after the 2020 election?

14 A I don't really. I may have seen stuff, but I don't have -- I don't have a lot of
15 stuff. I mean, look, a lot of people, you know, thought there was -- there was fraud.
16 So maybe I saw stuff from them, maybe I didn't, I just don't remember.

17 Q Okay. Have you ever heard of a group called Groundswell?

18 A Yes.

19 Q What do you know about Groundswell?

20 A It's -- it's a group of conservatives that meets, I think, on Wednesdays -- on
21 Wednesdays because -- at 10:00 or 8:00. So I mean, Steve has spoken to them before, I
22 think, once that I -- that I knew about, maybe twice.

23 And obviously you're probably going to ask me, but Mrs. Thomas runs it or works
24 or, you know, spearheads it or something like that.

25 Q It's been reported that Mr. Bannon helped form or found Groundswell. Is

1 that true?

2 A I wasn't a part of that founding and what went on there, so I only know what
3 I -- what he's said and he's talked to the media about it. So I don't know what -- if he
4 said he started it or was a part of -- something -- something along those lines. But that's
5 been in public information and in a story that I was -- a media story that he talked to
6 them.

7 Q Did you -- you mentioned Ms. Thomas. Do you know if she was involved
8 with Groundswell in the period between the election and January 6th?

9 A I don't. I mean, I don't know her well, so I don't know what she -- I don't
10 know what she was doing and what her things were. We've corresponded a little bit but
11 not much, and, you know, I don't -- I don't know.

12 Q Have you corresponded with respect to the election at all, the 2020
13 election?

14 A I can go back and look at my text messages, but she -- she wouldn't know me
15 unless I said, oh, by the way, I'm the person that does Steve Bannon's PR. I'm not a
16 close friend of hers, or I mean, I would not -- I barely even say acquaintance. I mean,
17 obviously, you know, I respect Justice Thomas and -- and Mrs. Thomas from afar, but I
18 don't -- I don't -- I'm not -- I would be exaggerating if I said that she probably even
19 remembered my name, even though we've corresponded a couple times.

20 Q And that would've been on behalf of Mr. Bannon?

21 A Yeah.

22 Q What do you understand Mr. Bannon's connection or relationship to her be?

23 A I just think they're -- they're friends or, you know, act- -- you know, fellow
24 conservatives.

25 Q Do you know if Mr. Bannon spoke to Groundswell at any of those

1 Wednesday calls or meetings in the period after the election?

2 A I don't know when that was. Remember, we were in the COVID stuff, so I
3 don't know if their meetings were even still happening and what they were doing and
4 whatnot. He did speak to them; in the time that I've worked for him, he's spoken to
5 them. But I'm not sure exactly what the date was, but I don't -- I'm not a part of their
6 group, and I'm not invited to go, so.

7 Q Okay. Yeah, if you have any of those text messages, that would be
8 helpful if you can take a look when you have a moment.

9 A Okay.

10 Q How about Cleta Mitchell, is that someone that Mr. Bannon has been in
11 contact with as far as you know?

12 A Yes.

13 Q During the period after the election?

14 A I'm not exactly sure the time frame of when. And I'm pretty sure she's
15 been on the show several times, but I'm not exactly sure when.

16 Q Okay. Are you aware of any efforts by Mr. Bannon to reach out to State
17 legislators after the election in any of the contested States -- Michigan, Pennsylvania,
18 Arizona, or Georgia?

19 A Well, obviously, there's the January 2nd event -- or phone call, I should
20 say -- phone call. I'm not really sure about -- I mean, he has those people on the
21 show -- or has -- not those people -- he has legislators on the show.

22 Q Okay.

23 A So, you know, don't know exactly who he knows well.

24 Q Okay. So I said we were going to talk about the call, and then I got us
25 sidetracked again.

1 A That's okay.

2 Q So -- and I think you said you were asked to assist in some way, but you
3 weren't sure exactly when. Tell me what you remember about how you or why you got
4 involved with trying to set up that call?

5 A You know, he knows that I know -- I mean, this is my assumption because I
6 don't remember. But it was just -- my feeling is that, you know, he knows I know the
7 people in Pennsylvania, and so, you know, he let me know this was happening and then,
8 would I help? I did. And that Mark Serrano was the one who was organizing it -- or
9 some -- I don't know if he was -- he was connected to organizing it, I should say. I don't
10 know specifically what Mark Serrano was doing.

11 Q Who is Mark Serrano?

12 A I don't know him well, but I think he's -- he does PR as well.

13 Q Okay. [REDACTED] can you bring up exhibit 19.

14 This is a text, I believe it's with Maria Ryan --

15 A Uh-huh.

16 Q -- on January 1st. And it looks like -- can we scroll down to January 1,

17 [REDACTED]? I'll try to make this bigger on my end. There it is.

18 A Yeah.

19 Q And this is a long -- very long text, and it looks to be an invitation or a draft
20 of an invitation to this video conference.

21 A Uh-huh.

22 Q Did you draft this?

23 A Not that I recall. I think that was a copy of the -- an email that -- that Mark
24 Serrano had done. I think. I -- I, you know -- I -- I just think I copied -- I think -- does it
25 match the Mark Serrano thing? I don't even remember. Does it match that one or --

1 Q So we have a -- in exhibit 27, there's a text exchange with Boris Epshteyn --

2 A Uh-huh.

3 Q -- that looks like it's got similar text. I don't know that it's on the -- there
4 was a group text that you sent with Mr. Serrano.

5 A Okay.

6 Q But is it your recollection -- you didn't draft this?

7 A No. I don't think so. I got pulled in -- by the way, I mean, I just don't even
8 recall all that stuff. I know -- I remember the call and I remember getting the
9 information. They said, can you send it, so I did. But I think that that was written -- I
10 don't know who wrote it. I shouldn't say, I shouldn't make any guesses. But I think
11 Mark Serrano had sent an email that looked similar to that.

12 Q I'm trying to understand why you were involved at all on this. Do you have
13 any sense of that, as to why you're in the -- you'd be put in the middle of sending
14 something that someone else is drafting to Maria Ryan or getting the approval of
15 Mr. Giuliani?

16 A Well, I do, you know, in the year -- in the time of the COVID, there'd
17 be -- well, let's rewind. I work on lots of different events, and during the COVID, events
18 became calls. I mean, there's things -- there was always calls, of course. But people
19 would send me invitations all the time that I may not have organized, but said would you
20 share this with so and so. And kind of my business is being a connector, so that's one of
21 the reasons was, Steve -- Steve brought me in on this event at some point, and I don't
22 remember when it was. But I think it was maybe because I'm from Pennsylvania, and he
23 knows that I know people in Pennsylvania, maybe. I can't really remember.

24 But occasionally, like, when things are high level or -- that's the wrong word -- he
25 would -- he'd have me work on something like this. But he --

1 Q Sorry. I didn't mean to cut you off.

2 A No, it's good, yeah.

3 Q Do you know why he was involved in this -- or what was his role?

4 A I can't remember what -- I'm not really certain exactly, and I don't really
5 remember. What I remember about this call is getting pulled in and that Mark Serrano
6 was a part of it and there were legislators. And I don't really remember, you know,
7 much after -- much of the details after that.

8 Q Okay.

9 A Because I was at the theme park with my nephews, and they were annoyed
10 that I was not paying -- you know, I was not fully devoted to them.

11 Q Yeah. This looks like it was on New Year's Day --

12 A Yeah.

13 Q -- that you were being pulled into this. Let's look at exhibit 27 which is the
14 same -- there's the same text that you're forwarding to Boris Epshteyn. And at the
15 bottom of it -- so if we go to page -- it's page number 508, it says, "per Steve. You're
16 sending it to Boris."

17 A Uh-huh.

18 Q Again, any recollection as to why you're looping Mr. Epshteyn in on this?

19 A That's just kind of standard. Steve would say, oh, share this with so and so.
20 And even, like, for instance, you asked earlier about the media blast. Oh, share this with
21 people -- share this with my family or share this with my -- my, you know, colleagues or
22 friends, so. I don't really -- I don't remember, you know, the genesis of that.

23 Q Okay. And then the next -- if we scroll down just a little bit to the very next
24 text that's at 7:00 at night on January 1st, Steve wants to do a prep call tonight at 8. Do
25 you remember anything about that and how that came about?

1 A No. Just obviously just a prep call for what's going to be on the other call.
2 That's what it looks like.

3 Q And then it looks like you were on that prep call. Do you remember that?

4 A I don't. But it just --

5 Q Okay. We'll scroll down --

6 A And I don't -- I mean, I don't maybe sound like a dummy. I should be more
7 eloquent. I -- you know, I think all of us multitask sometimes. So my job is to connect,
8 that's what I did. I'm not the strategist or thing, so that's what it looks like to me. I
9 don't remember.

10 Q Okay. Mr. Epshteyn sends some talking points to you.

11 A Uh-huh.

12 Q Do you remember anything about that or discussing that with him,
13 discussing with Mr. Bannon why Mr. Epshteyn was doing talking points for the call?

14 A I don't remember. I mean --

15 Q Okay.

16 A Yeah. I'm sorry about that. Just not --

17 Q So I'm going to -- we can scroll little bit down to page 513 on this text
18 exchange with Mr. Epshteyn, and I'm reading a little something into this, and I want to
19 make sure I'm getting this right.

20 It looks like you were on the prep call, listening in on the prep call, and that you
21 are communicating with Mr. Epshteyn about your views of the call.

22 A Where is that? Yeah.

23 Q So that's why I'm -- I'm reading something into it. There's discussion about
24 setting up the call.

25 A Oh, I see. What's the point of all this?

1 Q And then you say, "What's the point of all this." And then if we go down to
2 the next page, it picks up at the top of the page so it's all together, "What's the point of all
3 this, I am done, I can only tell you what Pennsylvania State legislators who support the
4 President are telling me. They are done, they are tired."

5 Do you remember whether you're having this exchange with Mr. Epshteyn while
6 this call is going on?

7 A It looks like that to me, and that sounds like what happened.

8 Q And then you say, call you after this, which again that's why I'm reading into
9 it --

10 A Yeah, no, I appreciate it.

11 Q -- that something is happening. Does that make sense?

12 A Yep.

13 Q Do you remember having this exchange with Mr. Epshteyn, or feeling this
14 way about the call? Maybe that's a better way to ask it.

15 A Again, I don't mean to -- I think there are lots of people on both sides of the
16 aisle for the last two elections, felt that there was not the sanctity of the ballot. And I
17 don't mean to besmirch anybody that thinks differently than me. I just -- I'm ready to
18 move on. So that was just my opinion. And I don't remember the details. I just kind
19 of, as I said, wasn't really paying attention to the call. I just was -- again, I don't mean to
20 call into question the sincerity of people that are concerned.

21 And there's a lot to be concerned about, that both -- both sides of the aisle have
22 reason to be concerned. I just -- I like to be a glass-half-full kind of person and just move
23 on, and I think that's generally the way I felt for some considerable amount of time.

1

2 [1:21 p.m.]

3

BY MR. [REDACTED]

4

Q So -- and this is pretty far along, right? We're already into January now.

5

The election is 2 months prior to that. And so I take it by sort of this point you had kind

6

of had enough and you were of the view that the President should just move on.

7

A Yeah.

8

Q Is that fair?

9

A And, again, I mean no disrespect to people who were seriously concerned.

10

Just moving on doesn't mean that, you know, there wasn't fraud by either party at either

11

times. But I just felt like let's move forward. I just like to live a glass half full kind of

12

life.

13

Q It looks like, not only from this text but from others, that you had a fairly sort

14

of open, candid relationship with Boris Epshteyn. Am I --

15

A Yes. Yes.

16

Q -- reading that properly?

17

A Yes.

18

Q Do you remember having any discussions with him -- you even talk about

19

having an offline call maybe after this one -- about his views on the topic we've just been

20

talking about?

21

A I don't remember the conversation. But, you know, when you -- you know,

22

I'm with my family. You know, again, there's nothing wrong -- these people are sincere

23

about things, and that's great, but it's, you know -- I'm ready to move forward. I don't

24

remember what Boris said or the details, but -- you know.

25

Q If we scroll down a little bit more, [REDACTED], you can sort of -- there's a little

1 more of this discussion that seems to go on during the call. He says he's done. You
2 say: I'm done too.

3 He says: I'm done with this call and Phill Kline, this is dumb. This is such a
4 waste of f'ing time.

5 Do you remember continuing that discussion with him offline or having a
6 discussion about why he was --

7 A No, I don't remember.

8 Q -- feeling that way?

9 A No, I don't remember what it was, but as -- there's the quote that I told you
10 about earlier. Just my feelings, you know. I was ready to move forward. Again, it
11 doesn't -- I don't mean to besmirch anybody in their honest search for what happened
12 and sincerity of it. I just was ready to move on. Second place bowl game, as I said.

13 Q Uh-huh. Okay. But I'm asking you whether Mr. Epshteyn ever sort of
14 fleshed out this conversation with you.

15 A I don't remember. It was just kind of like, you know, we're complaining
16 with each other, you know.

17 Q Yeah.

18 A Again, it doesn't -- it doesn't -- I don't mean to besmirch anybody. That's
19 just my feeling, and I was --

20 Q There looks like there was a -- this call completed and then the actual call
21 took place the next day. Were you on that one as well?

22 A I don't remember. I'm not sure. Do I say that to him? I don't
23 remember.

24 Q Well, there's a lot of drama the next day regarding getting the President on
25 the line and trying to track him down. Do you remember any of that?

1 A Yeah.

2 Q And that everyone was -- they were reaching out to you to reach out to
3 Molly Michael or Johnny McEntee or someone to try and get the President on the line.
4 Do you remember any of that?

5 A Yeah. I don't mean -- I don't remember the drama, but I remember that
6 Molly and Johnny.

7 Q Do you remember anything about what happened on that call, on the
8 videoconference with the State legislators?

9 A I don't know. I don't think it was a video.

10 Q Okay.

11 A Was it a video?

12 Q I think --

13 A I can't remember.

14 Q I think it was for some. Maybe not those who were with their nephews at
15 the theme park, but --

16 A Thank you. I don't remember.

17 Q Okay. This is reference to a Zoom link --

18 A Oh, yeah.

19 Q -- on exhibit 19 with Ms. Ryan.

20 A Yeah.

21 Q But do you remember anything about the call, videoconference, whatever it
22 was?

23 A No. I mean, I remember, as I said even earlier, look, it's an honor to be in a
24 phone call with the President of the United States. And he's, you know, admired by
25 many -- disliked by some but admired by many. So I don't really remember the details

1 of it.

2 Q If we go back to 19, [REDACTED] I think you've still got that tab up there. And
3 then down to page 435.

4 This is a longer text. So this is tracking the same rough time period, trying
5 to -- there's a discussion about trying to reach Molly Michael to get the President on the
6 line.

7 A Uh-huh.

8 Q Okay. Do you remember any of this?

9 A I remember, you know, trying to coordinate, yeah, and connect with, you
10 know, getting that sort of thing, yeah.

11 Q So right where [REDACTED] got the screen open right now, it says: She didn't
12 answer, I left a message. This is Maria Ryan talking to you.

13 And you say: Steve says we need POTUS on this call.

14 A Uh-huh.

15 Q Do you remember trying to talk with Mr. Bannon at the same time you were
16 trying to reach out to Ms. Michael, Ms. Ryan, and others to get the President on the call?

17 A I don't remember the exact details, but I remember trying to get -- they were
18 trying to get the President on the phone.

19 Q And is it your understanding that Mr. Bannon was on the call?

20 A I assume so. I'm sure he was, I think. I can't remember now, but I assume
21 he's on.

22 Q Okay. And it looks like the President was stuck on another call. In fact, if
23 you scroll down a little bit to 436, there's all this sort of drama about trying to get him,
24 but that he ultimately joined the call. Is that true?

25 A I believe so. I don't know what the, you know -- you know, the drama was

1 or whatever, but right.

2 Q Well, I see it in your text message. "Drama" is probably too strong of a
3 word. You probably were as cool as a cucumber. But it looks like there was a lot of
4 people scrambling to try and get him on the line, but he was on a different call, but
5 ultimately he joined the call.

6 A Yes.

7 Q Is that your recollection?

8 A That's my recollection, yes.

9 Q And on page 437 of that same text we're looking at, at the very top: He's
10 on - thank our dear Lord Jesus.

11 You get a thumbs up from Ms. Ryan. And she says: Now you know why he
12 couldn't be pulled off the other call!

13 Do you see that?

14 A Yes.

15 Q Do you remember, did the President come on and explain where he was or
16 why it was so important that he was so late?

17 A No, I don't, but -- yeah, I don't remember what that was, but I think it
18 was -- go back and look if there was some like foreign policy issue I'm thinking maybe.
19 But I can't remember. Yeah, I can't remember.

20 Q Okay. Let's take a quick look at exhibit 21 and 22, and then I'll move -- we'll
21 move off of this phone call.

22 And this is -- I think you were mentioning this earlier about Mark Serrano. And
23 you sent us a group text that has an MS in there and some other names. I just want to
24 ask you about who these -- who these other folks are, if you can remember.

25 A Am I waiting for --

1 Q We're waiting on [REDACTED]

2 A Oh, okay.

3 Q Exhibits 21 and 22.

4 So, yeah, if we can just leave them up there at the top, [REDACTED] with the bubbles
5 and see if we can zoom in.

6 So you can tell from the --

7 A Yes.

8 Q -- from the folks who are speaking on this, Mark Serrano must be the MS,
9 correct?

10 A Yes, yes.

11 Q Some of these other folks didn't show up I think on the part that we have, so
12 I was just hoping you could help me identify them.

13 A Okay. Can you pull it down? If [REDACTED] could just pull that down a little
14 bit, I could --

15 Q Yeah, pull that back up to the bubbles at the top. No, up in the direction.
16 There we go. And maybe zoom in on that if we can.

17 So I see a -- I see an SH. Do you know who that is? Is that --

18 A That's probably Steve Hantler.

19 Q Okay. And there's an S.

20 A So that's probably -- okay, there you go, that's good. Okay. So that's
21 probably -- six people. One, two, three, four, five, six. Okay. So -- and they
22 can -- [REDACTED] can you scroll down just so I can see the names and I can probably tell
23 from that.

24 Q I can tell you the only names that we have on this one are Serrano and
25 General Phill Kline --

1 A Okay.

2 Q -- who might be GK.

3 A Yeah, that's probably right. And then SKB New is Steve Bannon.

4 Q Okay. Any other folks? It's hard for me to make it out, but --

5 A Is anybody else typing? Any other names?

6 Q No.

7 A Okay. I don't remember, but, you know, I could click back on the image

8 and let you know. But I think it's probably like -- it's probably -- maybe it's Mark

9 Serrano's assistant or, you know -- but clearly, they're not responding to --

10 Q Got it.

11 A Yeah.

12 Mr. [REDACTED] Okay. So I'm going to move on to another topic. Before I do,

13 [REDACTED] any questions? Anyone else who's on the line?

14 Okay. Let's go -- I'm going to -- actually, [REDACTED], do you want to jump in for a bit

15 and talk about some of the early rallies? I know we're going out of chronological order

16 here. I'm just trying to make good use of our limited time that we have left.

17 Mr. [REDACTED] Yeah, sure. I can jump --

18 Ms. Preate. And while you're doing that, I'm going to check and see if the flight's

19 on time, because they were all getting canceled, so --

20 Mr. [REDACTED] I was actually about to ask, do you want like a quick recess, a couple

21 minutes to check?

22 Ms. Preate. Well, I want to answer your question, so I don't want to --

23 Mr. [REDACTED] Let's go off the record for one second.

24 [Recess.]

25 Mr. [REDACTED] Okay. We'll go back on the record.

1 BY MR. [REDACTED]

2 Q Okay. So I want to move back in time a little bit. We're going to go to
3 soon after the November election.

4 Were you aware of the slogan "stop the steal"?

5 A Generally, yes.

6 Q Okay. Did you know that there was an organization also known as "stop
7 the steal"?

8 A Yeah. Yes.

9 Q Were you aware that Mr. Bannon set up a Facebook page called "stop the
10 steal" around that time?

11 A I don't think so, but, you know --

12 Q Okay. And -- oh, go ahead.

13 A I'm just not techie, so he wouldn't have asked me to do it and I didn't -- I
14 don't recall knowing about it, but -- and I'm not quite actually sure what, you know, "stop
15 the steal" was exactly, but, you know --

16 Q Okay. So you were not involved in Mr. Bannon's "stop the steal"
17 Facebook page. Do you know who would have been helping him with that?

18 A No, I don't. Is "stop the steal," is that the Kylie Kremer people?

19 Q So "stop the steal" is, like you said, there's a lot of tentacles to it. There
20 was -- I'll represent to you that there was a -- there's reporting that Mr. Bannon set up a
21 Facebook page specifically called "stop the steal" right before the election, but -- does he
22 have a social --

23 A Yeah. I don't recall knowing about it.

24 Q Okay. So does he have a social media team that specifically works on those
25 type of things?

1 A There's somebody that works for him that does that sort of thing, but I don't
2 know -- I'm not really -- let's put it this way: Social media is not my thing, and he doesn't
3 do tons of social media that much until -- until recently, he's been doing some online,
4 but -- so I don't really know if it's him, if that's true or not.

5 Q Do you know -- so do you know the name of the person who would manage
6 a Facebook page for Mr. Bannon?

7 A I mean, it probably is this guy, maybe Dan Fleurette, but I don't know. I
8 don't want to say that because I don't know. So I really don't want to --

9 Q Okay. You don't -- but you don't know if he has a specific team dedicated
10 to social media?

11 A Yeah. As far as I know, not really, no.

12 Q All right. So I'll move on to the rally that happened in Washington, D.C., on
13 November 14th. Were you aware of this rally ahead of time? Or are you aware of the
14 rally that occurred in Washington, D.C., on November 14th, 2020?

15 A Vaguely, yeah. Is that the one that was maybe at the Supreme Court?

16 Q It -- yeah. It went -- no, that was the -- we'll get to that one. This was just
17 the first. I think they might have called it the Million MAGA March afterwards.

18 A I don't know. Yeah. I mean, here's the thing, he talks about stuff on his
19 show and then -- this is just not one of my focuses. So, yeah, ideas like mentioning
20 names and whatever, maybe, but I wasn't tracking that really a lot.

21 Q It was not your role to help coordinate the November 14th rally?

22 A Yeah, yeah. I --

23 Q So do you know if Mr. Bannon was working with anyone on the November
24 14th rally?

25 A Is that the one that was -- we don't know if that's the one that was

1 at -- there's -- I have a recollection --

2 Q We'll get to that one next, so there were a lot of rallies at this time.

3 A I remember one rally, and I don't remember which one. And somebody
4 asked him to speak, and he was like, I'm not going.

5 Q Okay.

6 A That's -- but I forget -- and I don't -- like you said "stop the steal." Is that
7 like a formal, like, incorporated name? Is it an effort? I mean, it's -- that's like a
8 full-time job remembering.

9 Q Right. So do you know Women for America First, the organization?

10 A Now, is that the Kremers?

11 Q Yes.

12 A Okay. I don't know what the name of it is, but I know they're involved in
13 some efforts, yeah.

14 Q Okay. So can we pull up exhibit 36?

15 You mentioned that you do remember that Mr. Bannon might have been asked to
16 speak at a later rally, but for the November 14th rally -- and if we can scroll down to the
17 second page -- do you remember anyone asking -- do you remember if the Kremers asked
18 you if Mr. Bannon would speak on November 14th?

19 You can keep scrolling down to the bottom. Right there is good. Oh, up a little
20 bit.

21 So these are text messages between Kylie Kremer and her mom, Amy Kremer,
22 from November 13th, 2020.

23 A With me on it or with --

24 Q No, just the two of them. And Amy Kremer, who I'll represent to you is
25 Mommagrizzly, she says: I've been asked if Bannon can speak.

1 Kylie responds: By who?

2 And Amy Kremer responds: Alexandra Preate.

3 So do you have a recollection of asking them --

4 A I don't remember what happened. My recollection is they wanted him to
5 speak. Whatever it was, there was one rally that they -- you know, and then he was like
6 I'm not going over there. That's all I remember.

7 Q Okay. So you don't remember anything tied to the November 14th rally?

8 A I just -- I just remember something on the Supreme Court. Was that
9 the -- whatever. And I don't remember if it was that day or something else.

10 Q That's fine. So -- but staying with the rally on November 14th, do -- I'll pull
11 up -- can we pull up exhibit 37?

12 This might help just spark your memory a little bit. And exhibit 37 are text
13 messages that you produced to us with Frank Scavo.

14 A Uh-huh.

15 Q And if we go down to 537, please.

16 There's a lot of them, sorry.

17 A That's okay.

18 Q At 537, we get to texts between the two of you on November 14th.

19 Keep going a little bit. Right there's a good start. Thank you.

20 So on the left are texts from Mr. Scavo, and he says: I have a bus of 55 peeps
21 going to Washington tomorrow. Will be doing live interviews with Scrantonians.

22 And then if we scroll down a little bit more, it seems that he sends you some
23 pictures from the event.

24 A Uh-huh.

25 Q Busload on our way to the President.

1 Do you remember Mr. Scavo sending you these pictures?

2 A I just vaguely remember that you -- when I went through and thought who
3 are the people that I should get a text from, and then I saw his and that's it. I don't
4 remember much, but --

5 Q Right. Did you talk to him about who he was bringing to the event?

6 A I don't think so. I mean, I don't -- I don't remember, but whatever is there.

7 Q Okay. So do you know anybody that went with Mr. Scavo to the event?

8 A I mean, you know, I know Frank is not a close friend of mine, but, I mean, I
9 know him, of course. But so I don't really -- I mean, you know, I don't have time -- I
10 don't recall getting into the weeds about that sort of stuff.

11 Q If we can scroll down a little bit more to 542.

12 There's a bunch of pictures, so we can -- we don't have to talk about all of them.

13 A Yeah.

14 Q Oh, right there. Thank you.

15 So on November 15th, he -- Mr. Scavo texts you: Ron Coleman attorney
16 attached. Trump attorney -- I'm not sure what that means -- call me. Ten-day plan for
17 victory. We better move.

18 Do you know what Mr. Scavo was referencing in those messages?

19 A I don't recall, no.

20 Q And did you ever follow up with him about them?

21 A I mean, you can see he said, you must have been kidnapped. You know, I
22 don't know. I have no idea. Yeah.

23 Q That's okay.

24 We can take that exhibit down. Thank you.

25 So now we'll go on to the rally that it seems like you do remember, the one where

1 there was talk about Mr. Bannon speaking at the Supreme Court. And I'll represent to
2 you that this rally occurred on December 12th in Washington, D.C. And do you know
3 who put that rally on?

4 A That's December 14th?

5 Q December 12th.

6 A I don't remember.

7 Q So you were not involved in any conversations before the rally about
8 organizing it?

9 A I've never been hired or I never worked on any of the rallies. I don't -- I
10 have a vague recollection -- you know, I'll get people write me and ask him to speak at
11 something. You know, I don't really remember -- all I remember is there was one thing
12 he's like, I'm not going over there.

13 Q Okay.

14 A And that's all I remember.

15 Q Do you know if Mr. Bannon had any role in putting on the December 12th
16 rally, aside from speaking?

17 A Steve's not an organizer. He's not an organizer. He's a strategist, like a
18 radio show. He's not an organizer. He doesn't organize. No, he does not. Not that
19 I -- I have no idea, but that's not generally something that he does.

20 Q Are you aware that he sponsored the Women for America First -- that's the
21 Kremers' organization -- bus tour?

22 A I was aware that there was one thing that he sponsored. I don't know what
23 it -- I don't recall exactly what it was, but I remember he sponsored something.

24 Q Okay. Did he talk to you at all about his connection to the Kremers?

25 A I don't remember if he ever did. I -- my recollection is that I met

1 him -- them through him at some point, at some time, before this -- these rallies. And
2 so they knew me through him. That's my recollection. I don't think I met them any
3 other way. But I don't really remember, but --

4 Q So do you know when Mr. Bannon decided to promote the bus tour?

5 A You know, I -- you know, I was asked to -- somehow they -- you know, I got
6 connected at some point with them only because they knew of me because we had
7 contact before, as I recall it. I don't -- I don't really know.

8 Q That's okay. Let's try -- we can try -- exhibit 38 might help. And this is
9 another text message that you produced to us between yourself, Steve Bannon, and
10 somebody named Georgie O'Neill.

11 A Uh-huh.

12 Q And it looks like you're connecting Georgie and Steve.

13 Do you know who Georgie O'Neill is?

14 A Yes. This is very simple. This is not really -- I only gave -- not gave this to
15 you, but I only put that in there because it had their name in it. It's just a very simple
16 thing.

17 Georgie is a young kid who has a tech app that promotes events. And they -- last
18 time I heard, you know, they never even got back to him. That's all I remember. He's
19 like they never -- so he promotes nonpartisan things. This just happened to be to do an
20 event. And then they -- last I heard, they never even talked. So --

21 Q Okay.

22 A I tried to connect them, but nothing ever happened.

23 Q And were you -- was Steve Bannon included in this text message to get to
24 the Kremers, or I'm just wondering if -- why the three of you are on this message
25 together.

1 A Which? Who are the three?

2 Q If we scroll to the top.

3 A Oh, it's Georgie.

4 Q I'm sorry. Yes, it's you, Georgie -- Georgie and Bannon.

5 A Oh, it was just that he has this tech app and, you know, Steve -- I mean, this
6 is my recollection. You know, Steve's a good strategist and he knows everybody. And
7 Georgie was like, oh, you know, if you ever know of any events that we can do on this
8 tech app, you know, let us know.

9 And I can't remember how it all came to pass, but then he never had any part of
10 this. They I think ignored him because, obviously, it seemed like they were too busy.
11 So nothing.

12 Q Oh, yeah. Okay. That's fine. Just needed to, you know, close the loop
13 on that.

14 A Yeah. No, I don't -- yeah.

15 Q Do you have a sense of why Steve Bannon only mentioned the Kremers, and
16 were there other organizers that you thought of connecting Georgie with or that he
17 thought of connecting Georgie with?

18 A Oh, no. I mean, Steve's way too busy to get in the weeds on the -- you
19 know, he's -- Georgie would do like an event -- I'm making this up -- but like, you know, at
20 Penn State or, you know, UNC or something like that. It wasn't -- it was just trying to,
21 you know, be nice to a guy who has an app, that's all. It was just not relevant --

22 Q Understood.

23 A -- as I recall, yeah.

24 Q And then going back to the bus tour and the lead-up to December 12th
25 briefly, were you in contact with anybody besides the Kremers who was organizing or

1 working on the bus tour?

2 A Well, I think -- I think at some point -- well, I know at some point I became
3 aware that Dustin Stockton, he told me that he was working with them. But I don't
4 know when that was. And I'm not sure exactly what his role was, but he said he was
5 working with them.

6 Q Do you remember what Dustin and you talked about the rally or is it --

7 A Oh, we didn't -- I don't think we talked at the rally.

8 Q Oh, sorry, that was not clear by me. I meant, do you remember what you
9 and Dustin talked about in terms of the bus tour and the preparation for the rally?

10 A No. I just -- I don't know him well, so it was just odd, you know, that -- not
11 odd. I mean, just like, oh, Dustin's helping them. That's it. You know, we're
12 not -- yeah.

13 Q Yeah. Well, if we can pull up exhibit 40, please.

14 This is a text message from -- that we got from Kylie Kremer, so not from you.
15 And you are not on this text message chain, as far as I can tell.

16 A Oh, I see. Got it.

17 Q If we scroll down to -- right. Sorry, scroll down a little bit. Keep going.
18 Right there is good.

19 So on November 30th, Amy Kremer texts Kylie that says: Bannon is sending Luke
20 Livingston to cover the tour. Dustin just told me.

21 Do you know who Luke Livingston is?

22 A Not that I recall, no.

23 Q Okay. And do you know how Dustin would have known that Steve Bannon
24 is sending someone to cover the tour?

25 A I don't know what -- you know, I don't know -- no.

1 Q Do you have any sense -- I know you don't -- you said you don't know Dustin
2 Stockton very well. Do you have any sense of the relationship between Steve Bannon
3 and Dustin Stockton at this time?

4 A At this time right now?

5 Q No, no, at this time of the text message.

6 A No, no. I had met Dustin, you know, through -- and his girlfriend through
7 Steve and had just a little -- not much context or I don't really know tons about them, but
8 that's how I met them in the first place.

9 Q Uh-huh.

10 A My recollection is that maybe he worked at Breitbart, maybe he didn't. I'm
11 not sure. I can't remember. When Steve was running Breitbart, maybe. I don't know
12 if that's right.

13 Q Just in general then, do you have a sense of why Bannon would send
14 somebody to cover the bus tour? Is that something that he did normally for political
15 events?

16 A I mean, just generally speaking -- I don't know why specifically that one, but,
17 yeah, he covers events. And like you mentioned about that Ben Bergquam, he has
18 someone down at the border that's showing all these people coming across the border.
19 And so I'm sure it was something like that.

20 And I think -- as I said, I think Dustin worked either at Breitbart for him or at some
21 point he had worked for him, and -- and, you know, it's been reported in news stories that
22 I've worked on about that.

23 Q Right. So it was just essentially a correspondent --

24 A Yes.

25 Q -- situation, right?

1 A I assume that's what it was. I assume that's who Luke Livingston is.

2 Q Okay. Well, thank you.

3 Do you know who Ali Alexander is?

4 A Vaguely, vaguely. I know that he's somehow connected to all of this
5 vaguely, but I don't know --

6 Q Were you aware that he was helping plan the December 12th rally in
7 Washington, D.C.?

8 A I don't think so, but, you know -- I want to say like I -- Steve's just one of my
9 clients. I have all these other clients. And, you know, maybe, maybe not. I don't
10 know. He's not a close friend of mine. I don't know if I've even met him. I'm not
11 sure.

12 Q That's okay. Has -- do you know if he was in contact with Steve Bannon
13 often or at all?

14 A I don't know. I don't know. Yeah. I don't recall. I mean, has he been
15 on the show? I can't even remember. I don't know.

16 Q So if he were in contact with Mr. Bannon, you would not have been aware of
17 those communications, correct?

18 A I -- it's not anything that I recall. He's -- Ali Alexander is not a friend of
19 mine. I don't really know. Again, I can't remember if I've ever met him. I mean, I can
20 look in my text messages. I don't think so. I'm not even quite sure what he does, you
21 know.

22 Q Okay. I mean, if you've had text messages with him that you come across,
23 we would be interested --

24 A Yeah. I doubt it.

25 Q -- in those. Yeah, it sounds like you might not.

1 Just generally then, do you know if Mr. Bannon was working at all with Ali
2 Alexander?

3 A You know, again, Steve's not really an organizer. He's more of like the
4 strategist that does the show. But I don't know. You know, I don't really --

5 Q Sure. That's --

6 A Yeah.

7 Q Thank you. So let's talk about whether -- about Mr. Bannon possibly
8 speaking at the December 12th rally. As you noted, he did not end up speaking.

9 Do you remember who wanted him to speak at the rally?

10 A My only recollection, as I've, you know -- I can't remember the date -- is only
11 what I told you. At some point he said, I'm not going to -- tell them I'm not going to the
12 rally.

13 Maybe he wanted to in the beginning. Maybe he didn't. I can't even
14 remember. But I know at some point -- all I do remember is there was some rally he
15 was invited to. It's some that was on the Supreme Court steps, I thought. He was like,
16 no, tell them I'm not going, or, I'm not going to go.

17 Q And was it the Kremers who wanted to get him to speak at the December
18 12th rally?

19 A I guess so. That's my feeling.

20 Q I could pull up an exhibit and show it to you or I can just represent to you
21 that it was the Kremers that you were talking to about --

22 A Yeah. That's what -- that's what I -- that's what I -- my recollection, yeah.

23 Q And --

24 A Whether it was that they asked him first or he asked first and then he
25 changed his mind, I don't remember, but what I do remember is he was like, I'm not

1 going.

2 Q So -- but you do have a sense that he -- at a certain point in time before
3 December 12th, he wanted to speak?

4 A No, I don't recall that. It might have been. All I distinctly remember is
5 he's like I'm not going over there.

6 Q Okay. Can we pull up exhibit --

7 A He may have wanted to go. They may have wanted him to go. I don't
8 know. But, you know, some events just -- you know, some events were happening.
9 Some of them weren't because of COVID, people changing their minds. You know, I
10 don't really remember. Yeah. Either one could have been the case. I just don't
11 remember.

12 Q Right. Let's pull up exhibit 43 then.

13 And these are text messages you produced to us, your text messages with, looks
14 like, Amy Kremer. And on December 11th, you ask Ms. Kremer a question: Do you
15 want Steve to speak? Yeah, logistics.

16 And Ms. Kremer says the next morning: Yes, we would love to have him.

17 So based on that text message, do you think Mr. Bannon wanted to -- possibly
18 wanted to speak at the December 12th rally?

19 A Maybe, yeah. As I said, it could have been either one, you know. I think
20 they were on the show. I can't remember. But all I do -- yeah.

21 Q If Mr. Bannon wanted to speak, do you have a sense of why he would have
22 wanted to talk?

23 A No. I mean, I think -- I don't remember the details of what the march was
24 about. Like, I assume it was about election integrity and --

25 Q Yes.

1 A So, obviously, he was focused on that issue. So I don't remember, but, you
2 know, it'd be like someone asking him to speak at an event, you know, talking about the
3 Chinese Communist Party and what they were doing, and that would be, you know, up his
4 alley. So something like that.

5 Q Does Mr. Bannon speak often in person at events?

6 A Not -- I mean, I don't know what your definition of often is. But for me,
7 like, who sees speakers, not so much. Sometimes he'll say he'll go and he'll change his
8 mind. And then the COVID happened and it was -- you know, everything kind of got off
9 kilter. And, you know, some events were happening, then they got canceled and they
10 didn't happen and, you know.

11 Q Right. So for you who's a professional at this -- and like you say, I am not a
12 professional PR person -- what would you consider speaking often in the course -- over
13 the course of a year, like a rough estimate of how many times?

14 A Yeah. I don't think Steve speaks at a lot of events. And --

15 Q Okay.

16 A And so even sometimes when he says he's going to do it, he'll change his
17 mind. So --

18 Q And did he ever talk to you at all about what he would say on December
19 12th?

20 A I don't remember, you know. You know, at the time, of course,
21 these -- you know, these rallies -- I mean, it's just another thing -- you know what I mean?

22 Q Right.

23 A -- on the list, yeah.

24 Q Then if we could pull up exhibit 44.

25 These are not text messages that you produced, but is it -- was it Mr. Bannon's

1 standard practice to not want to be listed as a speaker at events?

2 A What is this text message?

3 Q Oh, we'll scroll down. Sorry, I was asking a question before you having
4 the --

5 A Oh, that's okay.

6 Q But this is a text message -- I'll just explain it to you -- between Kylie Kremer
7 and Dustin Stockton. Dustin's on the left, Kylie's on the right. And you can see, if we
8 scroll down a little more, the text gets cut off. So right there is fine.

9 On the left -- sorry. On the left it's Kylie Kremer, and she says, Bannon is not to
10 be listed anywhere.

11 And they're talking about a schedule for the December 12th speaker event.

12 A Uh-huh.

13 Q Was it Mr. Bannon's standard practice to -- I don't want to -- "hide" might
14 not be the right word, but not to want to be listed on speaking events at rallies?

15 A I don't know exactly what you mean, but, generally speaking, he
16 doesn't -- you know, if he's not certain -- he may say yes and change his mind. That's
17 often what happens. There's always -- he's very busy and whatever.

18 So sometimes he -- you know, you can tell them that I'm going to come. Not
19 these people. In general. I'm saying in general. You can tell them I'm going to speak,
20 but I can't really commit until closer. I might have to change my mind. So that would
21 be standard that he doesn't want to be listed somewhere because he knows he might
22 change his mind. And especially during the COVID, he really was not -- he was very
23 careful.

24 Q Right. Okay. So this was just standard practice, because he was up and
25 down about December 12th, whether to speak?

1 A Yeah. I don't remember that thing in particular, but, again, during the
2 COVID, he was generally careful about -- about stuff. But also, I mean, just speaking in
3 general, you know, he maybe sometimes says I'll go and then I won't go.

4 And so it wouldn't be un -- it wouldn't be out of the norm for him to say, don't list
5 my name anywhere. I'll probably come speak, but don't list my name because I just
6 can't commit yet.

7 Q Understood. Do you remember when specifically Mr. Bannon made a
8 decision not to speak?

9 A I don't. Again, I've -- you've showed me more than I remember about that.
10 All I remember about one of the events is it was supposed to take place, as I recall it, on
11 the Supreme Court. And he was like, no, tell them I'm not going to go.

12 Q That's exactly basically what happened. I can represent to you it was
13 somewhere around 2:30 that the Kremers asked if he was coming, and you more or less,
14 you know, demur and say no.

15 Did Mr. Bannon give you an explanation for why he decided against going to the
16 rally?

17 A Well, I can't remember, but just in general during the COVID he was careful.

18 Q Okay. So it wasn't anything specific about this rally then?

19 A Well, I don't remember. I mean, I can't remember. I mean, there's the
20 COVID. There's also security concerns for him in general.

21 Q Right.

22 A So I don't remember. It could have been a myriad of reasons.

23 Q Oh, speaking of security, do you have a sense if when Mr. Bannon does go
24 speak, does he need security?

25 A I think it's not a bad thing for any political figures on the right or the left

1 these days to have security. So does he need it? I mean, you know, I would say so.
2 But, you know -- it's also, by the way, just like getting in and out of places. If you -- you
3 know, you're doing two radio shows or hours of radio shows or even anybody. These
4 Congressmen, I mean, they just can get -- if they, you know, they can't stay at an event
5 for that long, sometimes that's just what happens.

6 Q And do you know who Mr. Bannon used for security?

7 A Ever or you mean in this time period?

8 Q So we'll start just in this time period. Do you know if he had a security firm
9 that he was using?

10 A I don't.

11 Q Okay.

12 A I don't recall.

13 Q Did he ever --

14 A During the COVID, remember, things -- he was -- all I remember is during the
15 COVID he was very cautious. So I don't -- I don't know even where he went. I don't
16 know. But he was very cautious. So I don't know if he needed security then.

17 Q Right. Do you --

18 A I have no idea.

19 Q Okay. So he didn't talk to you about whether he had a security detail lined
20 up for December 12th?

21 A Oh, I don't remember. He may have, but I doubt it, you know.

22 Q And did he ever talk about certain groups that he would use for security, not
23 just in this time period but, you know, maybe in the past?

24 A Oh, no. I mean, that's his deal, like not my deal. You know what I mean?
25 The only thing that might relate to what you're talking about is like, you know, if some

1 people that -- that, you know, might be an advance person for him would then also act as
2 security sometimes. But that's just not my deal, so I don't really know who he was using
3 or what he was doing, other than he was very careful during the COVID.

4 Q Okay. I'm just going to ask maybe just a more direct question just for the
5 record, because we know that people like Mike Flynn and Roger Stone used certain
6 groups like the Proud Boys or a group known as the First Amendment Praetorian for
7 security.

8 Did Mr. Bannon ever talk about groups like that as security?

9 A So I don't -- I just would say this to you: Steve Bannon is the most -- he has
10 more people of different backgrounds working for him, most diverse group of people
11 working for him at all. I've never seen him ever associate with anybody who was a racist
12 or any of those people in my life. And he loves to support the veterans. And so my
13 only recollection is that he would have vets as security.

14 But I can't recall during that time who that may have been. I don't -- I wasn't
15 working in his location and that wasn't my deal.

16 Q Got it. So the name Vets for Trump --

17 A So that's a long answer.

18 Q Oh, no, thank you. It was a very helpful answer and I appreciate it.

19 Does the name Vets for Trump ring a bell at all?

20 A No.

21 Q Okay.

22 A Not really. I don't recall.

23 Q And the group the Oath Keepers proclaims to get veterans into their group.

24 Was that the kind of veteran group he was working with?

25 A No. No, not that I recall ever. Never ever heard --

1 Q Thank you. And just the -- do you know if Mr. Bannon watched the rally?

2 A I have no idea. I don't recall.

3 Q Okay. And the last question I have on this December rally before I ask [REDACTED]
4 if he has any followup, if we can pull up exhibit 43 and go down to page 313.

5 And this is a text message chain that you produced between you and Amy Kremer.
6 And the text that I want to ask about is from December 12th.

7 We might be having some more technical difficulties here. This is what happens
8 in the modern world with everything being remote, so we apologize for the delay.

9 [REDACTED] do you have exhibit 43? Can you see it? I can't see it on the screen.

10 No? Okay. Why don't we recess in place really quickly. Oh, never mind,
11 there it comes. Saves us from having to do that.

12 So if you could scroll up a little bit, [REDACTED] Right there is perfect.

13 So this is about -- where you're talking about Amy Kremer wants Steve Bannon to
14 come speak at Supreme Court. And I'll represent to you you're being kind of gentle in
15 letting -- in saying that he won't. And she says: I did it so Steve could speak."

16 I'm not sure what "Short around Steve" means, but do you know why Amy Kremer
17 said that -- seems to imply that she had this rally so that Steve could speak or had
18 something that Steve could speak?

19 A I don't know what she means. Yeah.

20 Q Okay. And there's no followup text from you to that conversation. Did
21 you ever talk to her on the phone about this on December 12th?

22 A No, I don't -- I may have. I don't think so. I don't know.

23 Q Okay. So -- and Mr. Bannon never talked to you about his prominent role
24 or apparently prominent role in the December 12th rally, according to Ms. Kremer's text?

25 A All I remember is his saying I'm not going.

1 Q Okay. Well, thank you.

2 A I mean -- yeah.

3 Q That was fine. If you don't remember, you can't remember. So thank you
4 very much.

5 Mr. [REDACTED] And, [REDACTED] we'll pass it back to you.

6 BY MR. [REDACTED]

7 Q Okay. Ms. Preate, are you okay to keep going for a bit?

8 A Yes, absolutely.

9 Q I've got my eye on the clock and we're going to get you out in time for your
10 flight.

11 A Thank you.

12 Q And we're entering what we'll call the speed round.

13 A Okay. I'm focused.

14 Q Okay. So let's pull up exhibit 1. Going all the way back to the beginning.
15 And these are some text messages you had with Johnny McEntee.

16 A Yes.

17 Q Do you recall how it was that you got put in touch with Mr. McEntee?

18 A I've just known him since the first campaign.

19 Q Okay. At some point, were you told by Mr. Bannon or someone else that
20 you should be communicating with Mr. McEntee regarding election fraud issues?

21 A I don't recall. But, you know, we were friendly. I mean, we weren't best
22 friends by any means, but we were just friendly. And we would, you know, keep in
23 touch occasionally.

24 Q So at the top of this exhibit, there's -- this is the FOX Maria Bartiromo
25 interview that we were talking about earlier. I think I told you that we saw a few

1 instances you forwarding that on.

2 Do you remember why you would be sending that to Mr. McEntee on November
3 5th?

4 A No. I mean, it's just -- just my feeling that remembering back that -- that
5 long ago, it was just we would keep in touch about, you know, he -- that we would just
6 keep in touch about, hi, how are you, or something like that. And he knew Steve from
7 2016. So that was what I recall.

8 Q It looks like in the -- in the -- in the succeeding days and weeks, you were
9 texting with Mr. McEntee almost sort of as the two of you were conduits between Mr.
10 Bannon and the President at some level. Is that sort of a fair characterization of it?

11 And I'm not -- I don't mean anything pejorative or inappropriate about that term,
12 but that the two of you were passing messages back and forth from Mr. Bannon to the
13 President and vice versa.

14 A Well, I wouldn't -- like you said, it's exactly how to say -- I think that we were
15 the junior staff people. So I had a friendship with him outside of Steve, but we
16 would -- we would -- we would kind of set up, you know, a meeting or something like
17 that, or whatever I sent to you, you know, either him or Molly.

18 Q Okay. So on November 7th, we see that --

19 Can we scroll down just a little bit, [REDACTED]

20 It says: How are you? Hope you're holding up. Steve wants to talk with
21 POTUS about a path here with the media call today.

22 Do you remember what that was about?

23 A I don't. And, you know, as I said, sometimes Steve would just say, do this,
24 tell -- I don't know if you heard the last conversation with [REDACTED] He'd just say, you
25 know, tell the Kremers I'm not coming, and --

1 Q Yeah.

2 A You know, just very curt, short. That was --

3 Q Do you have a sense of why Mr. Bannon would relay a mess- -- if he wanted
4 to get a message to the President or talk to him, why he would go through you, through
5 Mr. McEntee, and then to the President?

6 A Oh, I just made -- I don't know, but I just made the assumption because we'd
7 all known each other for a while. So -- because he was in -- Johnny was there in 2016.
8 Steve was there then. I was there then. So -- you know, Steve has other people
9 working around him, but I just made the assumption because of that, he knew that I was
10 friendly with Johnny.

11 Q Okay. It looked like Steve was talking with other folks who were close to
12 the President on a fairly regular basis in this timeframe. Do you have any reason to -- do
13 you know that or do you -- do you have any reason to sort of doubt or dispute that?

14 A I mean, I'm not sure exact --

15 Q That was a bad question. Did you know that he was talking to people who
16 were close to the President in that timeframe on a regular basis?

17 A I don't -- again, I don't know who Steve's talking to all the time or really,
18 yeah, most of the time. I have no idea. But -- and I don't know -- you mean who's
19 close to the President, but, you know, obviously --

20 Q So, for example, Steve was talking to Boris Epshteyn several times a day in
21 this same timeframe. And so I'm just trying to get a better understanding of, if Steve
22 wanted to talk to the President or get a message to the President, why he wouldn't ask
23 Boris to just ask the President as opposed to asking you to ask Johnny to ask the
24 President.

25 A Oh, I mean, I just made the assumption that, again, like I said, Johnny and I

1 were friends, and everybody's busy and, you know, he knew that I was friendly with
2 Johnny, and it was something like that.

3 I mean, I don't know what he talks to Boris about. So, you know, I think -- I
4 think it's just -- you know, just I think it comes to his mind that I know Johnny or
5 something like that. That's the assumption that I make in that.

6 Q Got it. Got it. So he never said anything different to you, like, hey, here's
7 why I need you to work it through Johnny, nothing like that?

8 A No, no, no. I think it was just kind of he knew that he and -- Johnny and I
9 were friends or -- that's -- like simple stuff like that.

10 Q Okay. Do you have any idea or do you remember what the media call is
11 that's referred to here in this text?

12 A I don't. I don't.

13 Q Do you have any idea what Steve was referring to or do you remember what
14 he might have been referring to when he says "a path," there's a path here?

15 A I don't know. I don't. I mean, only because you showed me the Maria
16 Bartiromo thing. Is that around the same time from up above?

17 Q It is. It's a couple days before, yeah.

18 A Yeah.

19 Q And I guess -- and I was listening to your answers with respect to James.
20 And I also have heard you say this earlier, in terms of the way he would sort of delegate,
21 you know, rapid-fire sort of, hey, can you do this or that without a lot of discussion
22 behind it sometimes.

23 A Yeah.

24 Q But do you remember any discussion with Mr. Bannon in which he said to
25 you, hey, here's a path that I'd like to present to the President, would you let Johnny

1 know, and then shared some of the details of it with you?

2 A No. And -- no. That's just not the way -- I mean, occasionally, again, he
3 would give me -- explain more about this idea or that idea, but not really, not as much.
4 It's more like that, what I just sent to you -- or I mean what I printed for you.

5 Q Okay. And on this one in particular then, do you have any recollection of a
6 discussion about a path for the President?

7 A No.

8 Q Okay. On the next page, you're back and forth about how best to connect
9 and so forth. And then Johnny asks you: Did they connect?

10 This is the next day, early in the morning. And looks like maybe you forward him
11 a message from Steve that says: tell Johnny from me "we've got this," and Johnny
12 loves -- or reacts to the message with a heart.

13 A Right.

14 Q So do you remember communicating or asking Steve whether they
15 connected and then Steve telling you to send that message to Johnny? Like, do you
16 remember anything else about that exchange?

17 A No, but -- I don't, but in general, you could see that, you know, I just cut and
18 pasted that, because I don't know specifically what he's talking about.

19 Q So you're in the middle on this one. Johnny is saying, did you connect?
20 So you presumably would say to Steve, hey, did you connect? And then Steve says to
21 you -- he forwards something, and you forward that on to Johnny. You're just
22 transmitting messages.

23 A Yes.

24 Q Let's go to exhibit 2. This is more texts with Mr. McEntee. November
25 22nd.

1 And let's scroll down a little bit to the second page, I think. It's the 5:05 p.m.
2 text.

3 Steve wanted you and Boris E. to connect, and then you provide Johnny McEntee
4 with Mr. Epshteyn's number.

5 You see that?

6 A Yes.

7 Q And he says, Oh no, with -- I don't know how you describe that emoji. Is
8 that like the hands to the face emoji?

9 A Yes.

10 Q Do you have any recollection of this?

11 A What does he say after that? LOL, you don't like him?

12 Q I do, but he hounds me all day every day.

13 Oh, so maybe there's the explanation.

14 A Yeah. Yeah.

15 Q All right. And do you know whether -- do you know why Steve wanted
16 Boris to be in touch with Mr. McEntee?

17 A No. No, just -- just passed the message on and that's it. And -- yeah.

18 Q Okay. It seems later that Mr. -- in a different text, which I'll just represent
19 to you Mr. Epshteyn seems somewhat slightly insecure about the relationship with
20 Johnny McEntee. Am I misreading that? Do you know any basis for that?

21 A Obviously, that's what it looks like. I just think that, you know -- you know,
22 everybody -- everybody -- you know, everybody wants to know Johnny or Molly or this or
23 that. So I -- you know, just kind of a silly thing, you know.

24 Q Okay. So you never -- you never understood or heard about any particular
25 tension between them, other than what Mr. McEntee says here?

1 A Oh, no, just what he says there, he hounds me all day.

2 Q Okay.

3 A I'm sure like, you know, for the Congressmen, for you guys, you get -- you
4 get all the people that want to talk to you. You just can't keep up all day. That's
5 all that -- that's all that I took from that.

6 Q Okay. Let's go to exhibit 3.

7 There's another text message I believe with Mr. McEntee. And it seems as if,
8 again, you're sort of playing messenger here.

9 A Yes.

10 Q KG wants Steve and POTUS to talk.

11 Do you have -- is it your understanding -- do you have any understanding as to
12 who KG is there?

13 A That's Kimberly Guilfoyle.

14 Q Do you remember -- do you have any idea what prompted this text message
15 from you to Mr. McEntee?

16 A No. I mean, KG wants Steve and POTUS to talk. Steve has three next
17 steps.

18 No. I think, you know, that may have been -- you know, she had seen something
19 Steve talked about, you know, got past one of his clips or -- I'm not really sure. But, you
20 know, I think a lot of people think Steve is smart. So that's all the -- the -- that's what
21 I -- that's what I take away from reading that.

22 Q So it looks like you are letting Mr. McEntee know that Steve has three next
23 steps that he can take to "stop the steal," but -- presumably that POTUS could take to
24 "stop the steal," right?

25 A Uh-huh.

1 Q Do you know what three steps you were talking about, how you learned of
2 that? Is that from Ms. Guilfoyle, Steve Bannon, or some other way?

3 A I don't recall at all what that is. And [REDACTED] and I had that conversation
4 about I'm not -- "stop the steal," is it like -- is that an incorporated group? Is it -- you
5 know, is it a phrase? I don't know. I just thought that that was, you know -- it must
6 have been something that Steve said on the radio show or something like that.

7 Q Okay. Why I'm intrigued by this text message, it looks like KG, or Ms.
8 Guilfoyle, is asking you to put these folks together, Mr. Bannon and the President, and
9 then that Steve also has maybe even shared with you that he's got some steps that he'd
10 like to share and that he'd like to meet with Navarro.

11 So can you help me sort of break that down as to sort of who was directing, if you
12 recall, who was directing the text message?

13 A Well, I don't -- so this is just -- I don't recall this conversation, whatever, but
14 just in terms of generally speaking --

15 Q Yeah.

16 A -- it wasn't anybody being directed in this regard. It was just like Kimberly
17 thinks Steve is smart. Maybe he was talking about on the show. And everybody
18 generally supports the President's agenda, and that's just kind of a simple thing like that.

1

2 [2:24 p.m.]

3

BY MR. [REDACTED]

4

Q Okay. And it looks like -- sorry, go ahead.

5

A Yeah. I don't remember what the three next steps were, and Steve may

6

have done it on the radio show or something like that.

7

Q Okay. And it looks like Mr. McEntee forwarded it to a guy name Mike if we

8

scroll down to page 15. So maybe it's a page or two down, [REDACTED]. It's the page that

9

has 6 of 19 at the top.

10

A Uh-huh. Okay, let me see here.

11

Q He's got to go a little further down. Right. Oh, yep. Little more. Scroll

12

down a little further. That's all right. Maybe we've passed it. So it looks like he

13

forwards it on to someone and then sends you a screenshot of that.

14

A Uh-huh.

15

Q Do you know who Mike is?

16

A No, I don't. Maybe if you can scroll back, I can --

17

Q Yeah. If we go, [REDACTED] to page 16 -- you're on 17 now, so, yeah, up

18

another page. All right.

19

A Okay. Right there.

20

Q Yeah. Although you'd have to go up a little more to the previous page,

21

sorry, to 15, and you'll see the Mike reference. Maybe go up one more notch.

22

A Oh, I see.

23

Q Okay. So that looks like the full screenshot that was sent. Does that

24

help?

25

A "You can let the boss know Steve Bannon wants to talk to him." No.

1 Q Okay.

2 A No.

3 Q Now, that afternoon, Molly Michael reached out to you asking for Steve's
4 number --

5 A Maybe it's Mike Lindell. I don't know. I mean, it's just a guess. I don't
6 know.

7 Q Yeah, okay. If we could bring up exhibit 8 -- well, actually I'll just tell you.
8 You sent us a text message that you had with Molly Michael that same afternoon at 3:44,
9 asking for Steve's number. And then at 5:16 -- here we are back on the same
10 document --

11 A Uh-huh.

12 Q -- you know, that -- actually, just [REDACTED], let's stay on exhibit 3 and page 17.

13 A Uh-huh.

14 Q You texted Mr. McEntee that Steve and POTUS had the call.

15 A Uh-huh.

16 Q They had a call. You see that?

17 A Yes.

18 Q Okay. And I can represent to you that there was a call between
19 Mr. Bannon and the White House at 3:46. Then if you scroll down to -- or actually in
20 that same message, it says, POTUS told Steve to call him back in the 5 p.m. hour. Do you
21 see that?

22 A Yes.

23 Q Steve is still doing the research you requested and will call back. In the
24 meantime, he did -- looks like maybe a typo -- for me to give you these three names.

25 A Right.

1 Q So I have a few questions about this text. Do you know what research the
2 President asked Steve to do between the 3:46 call and this 5 p.m. central call?

3 A I don't -- no, I don't recall.

4 Q Did you assist with any research?

5 A I don't -- I don't recall. I mean, now that I'm seeing this text, I remember
6 this, but I forget what the names were for. You know, was it a spokesman, was it a
7 something. I can't -- I can't remember what they were for.

8 Q So it looked like there were two separate things happening here, that, one,
9 Steve was supposed to do some research and he was going to call back.

10 A Uh-huh.

11 Q And then in the meantime, he wanted you to pass these names along --

12 A Uh-huh.

13 Q -- to the President. Am I reading that right?

14 A Yeah. That's what it seems like to me. Yeah.

15 Q And you don't know what that research was about?

16 A I mean, only -- only because I'm reading it this way, it seems to me it's a
17 research which would be about those three names. And I recall something like that, but
18 I don't remember if it was, like -- you know, it was something, like, you know, like, a
19 James Baker type, or something like that. I don't recall but that's just what's -- I feel like
20 when I -- when I read this.

21 Q Do you know someone by the name of George Montgomery?

22 A I don't. The name sounds familiar when you're saying it, but I don't
23 remember who that is.

24 Q Okay. Did you ever -- and I'm not -- I don't want to delve into your family
25 business, but I'll just ask you this question. Did you ever talk with your dad about stuff

1 that Steve Bannon was doing for the President or ask him to assist with respect to things
2 that Mr. Bannon was doing for the President?

3 A I may have. I mean, my dad's, like, my -- my -- he's my dad. So I may
4 have. You know, I don't -- I don't remember in detail, but I certainly go to him for advice
5 and, you know, like -- like hopefully most people do with their parents.

6 Q But on these --

7 A Is there something specifically you're thinking about? I mean, I could think
8 about it.

9 Q Yeah. So there's a reference of Steve doing some research, and then
10 there's this -- the time frame, and we're trying to maybe understand what was maybe
11 happening in this mid-afternoon timeframe on the 13th.

12 A Uh-huh.

13 Q And I saw you called -- you had several calls with your dad, you had several
14 calls with Peter Navarro, and I'm just trying to try and piece together maybe what that
15 research was about.

16 A Well, then that's just -- when I read that, what I'm thinking, what
17 sounds -- and I mean, I could talk to my dad about a million things, so I don't know if it
18 was my dad or not, that -- about this or not. But just my feeling is that it was, like,
19 about, like, who the James Baker type. That's my feeling about it.

20 Q And by James Baker type, do you mean, like, a senior adviser?

21 A Right. Like a senior adviser, a respected person that, you know, would be a
22 spokesman or something like that. That -- that's my feeling when I see that.

23 Q Around this time, I'll represent to you that there were discussions involving
24 others and the President about maybe appointing a special counsel to assist with the
25 election integrity efforts. Do you have any knowledge of that?

1 A That may have been it. It was some -- what I -- I don't remember
2 specifically, but it may -- like a James Baker type, like, maybe with a special counsel,
3 someone that was, again, like a James Baker type, so. It may have been a special
4 counsel, but that's what my recollection is.

5 Q Okay.

6 A I guess -- I guess James Baker wasn't a special counsel, but somebody that
7 was a respected -- someone who was respected outward facing by -- to people.

8 Q Right.

9 A So it may have been a special counsel thing.

10 Q And if you were asked to help come up with names, or maybe vet names,
11 presumably you were told what the role was supposed to be, what this person was
12 supposed to do?

13 A Oh, yeah. I mean, it could've been. I just don't, you know, I don't
14 remember.

15 Q Okay.

16 A I mean, you're helping me with the calendar, you know, kind of refreshing
17 my memory, but -- all I do remember is, when I see that, what comes to my mind is, there
18 was a lot of people who thought there weren't a lot of -- there were people that thought
19 that there weren't a lot of articulate people out there talking about this issue or having
20 connection to this issue. So when I read that, that's what I think of as James Baker,
21 maybe as a special counsel role. I don't -- maybe that was it.

22 Q Okay.

23 A I just don't, you know --

24 Q Understood.

25 A -- remember. Yeah.

1 Q I brought up Mr. Navarro. I don't think we've talked about him much.

2 You had a fair amount of contact with Mr. Navarro in this time period?

3 A Yes.

4 Q What was the nature of your interactions with him?

5 A So he had -- you know, he's a former Wall Street guy, and he had done his
6 own analysis based upon real statis- -- based on what he perceived as real statistics, so
7 not anecdotal evidence but things that he had put into models. And he did reports on
8 that. So I helped get those reports to media.

9 Q This is what the so-called Navarro report, where he did --

10 A Yeah.

11 Q -- a volume --

12 A Yes.

13 Q -- discussion about election fraud?

14 A Yes. Yeah.

15 Q Okay. Do you know what, if any, role that Mr. Bannon had in those
16 reports, or in the work that Mr. Navarro was doing?

17 A I mean, he -- he has obviously had him on the show. I don't know, you
18 know, if he assisted in writing any of it. I mean, I don't -- I'm not sure. But he's, you
19 know, he's a frequent guest about those reports on the show.

20 Q Mr. Navarro has talked publicly about a strategy that he's claimed that
21 Mr. Bannon came up with, called, the Green Bay Sweep.

22 A Right.

23 Q Have you ever heard of that?

24 A Yes.

25 Q What's your understanding of what the Green Bay Sweep is?

1 A Well, since I mentioned I do love Vince Lombardi, I knew what the Green Bay
2 Sweep was, but -- I'm not a football buff, but I love Vince Lombardi. So, anyway, it was
3 something that Peter had in his book, but it wasn't really specific. So I don't know
4 exactly what it was, but he's talked about it, that my understanding -- and unfortunately, I
5 didn't read -- not unfortunately, but I didn't have time to read the book. So
6 what -- what my understanding is, is that it was the idea that people in the leg- -- the
7 U.S. -- in the Senate would explain what -- the election integrity issues, and that would
8 speak to it in a formal way on the record. And Peter has said that's why he and Steve
9 always -- that never would want any violence on January 6th because what they wanted
10 was to have those things talked about formally.

11 Q Okay. Is that the extent of your understanding of what the Green Bay
12 Sweep plan was?

13 A Generally speaking, yes. I just really didn't get a chance to read the book.
14 And -- and I've heard it talked about, but I just -- yeah, I didn't -- I don't know who -- even
15 though, you know, Peter's talked about it, I don't recall who that was. That's just -- who
16 those people were in general. I -- you know.

17 Q So my understanding of this plan that Mr. Bannon and Mr. Navarro came up
18 with -- I think they each give credit to the other. Mr. Navarro says that Mr. Bannon was
19 the hero for coming up with this. The plan involves Mike Pence, the Vice President, and
20 some role that he would play or actions he would take on January 6th. Does that ring a
21 bell?

22 A It -- it may be. It may be. I mean, I just want to say because I don't want
23 to -- I just -- I mean, I -- you know, Steve's one of my clients, and I have anywhere from,
24 like, six to 10 other clients. So I try and know as much as I can about each client, but I'm
25 not an election integrity expert. It's not my first and most cared passion. So I -- I

1 generally will know something. I'm a generalist in that regard. I am a specific person
2 in the lives of my nephews, but I'm a generalist in terms of, like, what all was going on, so
3 that's what I recall.

4 Q So do you ever talk with Mr. Bannon about the need for Congress or the
5 public to put pressure on Mike Pence to do something on January 6th?

6 A Wait. Can you re-say that? Do I ever recall him talking about --

7 Q Did you ever talk with Mr. Bannon about the need for either Congress or the
8 public to put pressure on Mike Pence to take some action on January 6th?

9 A And do you mean, like, on the telephone or text message or anything?

10 Q Anything. Other than listening to him talk about it maybe on the show.

11 A I don't recall those things, and he may have said it to me. That's personally
12 not something that I agree with.

13 Q I'm going to stop you right there. What don't you agree with?

14 A Well, I -- I should be -- I should be more specific. I just generally thought
15 that it was time to move on, and so, I kind of tuned out all that stuff, just I'm not
16 interested in it. I don't really want to focus on it. So he may or may not have said
17 something to me, and I literally am not interested in hearing about it. It's just not
18 something that -- I mean, I said, I came to my own conclusions about what happened.
19 So he may have said something to me, but it's not a conversation that I'm really listening
20 to or into, in general.

21 Q Okay. And I think we talked earlier about Professor Eastman who also had
22 some ideas about the role of Vice President Pence, and I think you've shared with us,
23 what, if anything, you remember about that.

24 A Again, I remember him being on the show. I don't know him well. And I
25 mean, I remember him just being portrayed as a, you know, as an excellent legal scholar,

1 and he -- that's all I know and -- it's just not my little, you know, just not my interest
2 really.

3 Q Okay. On the show, Mr. -- and I'm not going to belabor the point, but I
4 want to raise a couple other specific comments by Mr. Bannon and see if it rings a bell or
5 if it registered with you or if you had any further discussions with him about it.

6 On his show leading up to the 6th -- I think it was at the end of 2020, late
7 December -- Mr. Bannon talked about Mike Pence's moment of destiny, and that
8 January 6th was the moment of destiny that Mike Pence was going to be able to take
9 some action. Do you remember any of that or any -- do you remember having a
10 reaction or any discussions with Mr. Bannon about that?

11 A Look, I don't. I don't really remember. It's just not my -- I don't really
12 remember private conversations about that with him. He may have said something to
13 me, but it's just not my -- I made my own mind up about what I thought. And
14 everybody's entitled to their opinion about what happened in the election and the
15 sanctity of the ballot box, but I had made my decision already. So he may have said
16 something to me. It's just not -- and I personally stopped even reading about it. I just
17 did not -- I don't really even know what people wanted to be done. I just kind of turned
18 it off because I had said I've already made my opinion up about this.

19 Q Got it. It's been reported -- I think it might have been in Peril, the
20 Woodward book -- Woodward and Costa book, and I know Costa spent a lot of time
21 talking to Mr. Bannon in late December -- that Mr. Bannon called the President and told
22 him -- he was down in Florida and said, "You need to get back to D.C. and call Mike Pence
23 off the effing ski slopes because stuff needed to happen." Do you -- are you familiar
24 with that claim or that comment?

25 A Yes. Yeah. I'm familiar with that -- that story or that book or mention.

1 Q Do you have any light to shed on that? Are you aware that that
2 conversation took place?

3 A I can't remember where I've heard that from, if it was only in the book or
4 only written about or whether he mentioned something like that to me. I don't
5 remember. But I do remember that being -- that quote and that -- that idea.

6 Q But do you remember, in that time frame of Mr. Bannon being particularly
7 agitated that nothing was happening and that Pence was skiing and the President was in
8 Florida, and they don't understand the significance of what has to happen, anything to
9 that effect?

10 A Generally speak- -- yeah, I mean, he talked about it on the show. So I can't
11 remember if he had said something to me personally, but I certainly got it from -- from
12 somewhere having to do with Steve, about how, you know, people need to get focused or
13 something like that, so.

14 Q Okay. He said once on the show, I think, January 6th is the day of
15 reckoning. He also said, "we're going to bury Biden on January 6th, effing bury him."

16 A When did he say that?

17 Q I believe it was on the podcast in the days leading up to January 6th. I
18 don't have a date for you. But does that sound like -- is that a discussion you had with
19 him, again offline, other than what we hear on the show?

20 A I don't -- I don't recall having, like, that definitive, very focused conversation
21 with him on that, you know, but -- you know, I've never -- I've never heard him say
22 anything about, you know, violence or anything like that, ever to me, ever.

23 Q Okay.

24 A So I assume he meant -- yeah, like, what he talked about on the show.

25 Q There was -- this is a little bit off that topic, but talking about violence, and

1 there was sort of a famous incident where I think Mr. Bannon might've been kicked off
2 Twitter or --

3 A Yeah.

4 Q -- some sort of consequence about making a comment about FBI Director
5 Wray and, I think, Anthony Fauci, right, this "heads on pikes" comment.

6 A Yeah.

7 Q Probably as a PR person it was not a good week for you. You probably
8 remember it well.

9 A I do.

10 Q Do you know what Mr. Bannon's concerns were with FBI Director Wray, why
11 he was upset with Director Wray?

12 A I can't remember. I mean, he talked about it on the show. I don't know
13 specifically -- I forget -- here's my only recollection of that, was, he had been talking about
14 the king's court. And he didn't mean it literally. He meant in pre- -- you know, in
15 comments before that on the show, he was talking about the king's court. And he has
16 referenced even himself, saying how he was going to get his head chopped off by Trump
17 even in an article, like, in 2016 or '17. He likes to talk, put things in history. So
18 that -- obviously he didn't mean literally. But I don't remember what he said in the
19 show, what -- what it was specifically about.

20 Q Or what his beef was --

21 A -- about the pandemic.

22 Q What his beef was with the Director?

23 A I think it was the pandemic and the COVID, because he said Dr. Fauci too,
24 right?

25 Q Yes.

1 A Yeah. I think it was about the Chinese Communist Party and the COVID
2 and -- yeah.

3 Q To your knowledge, did Mr. Bannon ever have conversations directly with
4 the President about the need to replace Director Wray or any other government official?

5 A You know, all I remember is stuff that's been publicized. When you say
6 that comes to mind when he told -- it's been publicized that he told the President about
7 James Comey. But I wasn't there and I don't know.

8 Q Do you know if Mr. Bannon ever spoke to Mike Flynn in connection with the
9 2020 election?

10 A He's been on the show, so I assume that they have, yeah.

11 Q Do you know whether Mr. Bannon -- I'll represent to you -- well, it's been
12 reported that Mr. Flynn was involved in efforts to try to get the President to approve
13 taking control of voting machines in various States. Are you familiar with that story?

14 A I don't remember it. You know, I don't -- I don't remember it, but if it
15 happened, it happened. I just don't remember.

16 Q Do you know if Mr. Bannon was in touch with Mr. Flynn in connection with
17 any efforts to seize or take control of voting machines?

18 A I don't know. I don't know. I mean, I know he's been on the show, and I
19 don't recall any specifics.

20 Q Okay.

21 Mr. ██████████, do you want to cover anything else from the 5th or the 6th,
22 or are we pretty much good on that?

23 Mr. ██████████ There's some more stuff to talk about on January 5th and 6th. Do
24 you want to go over --

25 Mr. ██████████ Yeah. Why don't you take over. We'll keep an eye on the clock,

1 and then I may jump back in again. But why don't you go to that set.

2 Mr. [REDACTED] Yeah.

3 BY MR. [REDACTED]

4 Q Okay. So about on January 4th, Mr. Bannon on his War Room podcast says,
5 "Starting tomorrow, it's going to be wild." And then he says something along the lines,
6 that "Trump's second term is going to start with a bang." Do you remember hearing
7 those?

8 A I don't remember that specifically, but that sounds like what he -- a feeling of
9 what he had said, yeah.

10 Q Yeah. So that's not out of the ordinary for him to say that?

11 A But he uses -- like I said, he uses history and language like that, so, yeah, I
12 mean, if you -- if you say he said it, then I'm sure he did.

13 Q But you didn't talk to him about what he meant by going to be wild or starts
14 with a bang?

15 A I don't remember, and he may have text me about it, but it was nothing, you
16 know, that was -- that I remember.

17 Q Okay. In terms of the rallies themselves, do you know who organized the
18 rallies on January 5th and 6th?

19 A So my only -- I didn't work on them, so I don't know who was specifically
20 involved other than the little that I did know, and then what I've subsequently may have
21 seen in the news.

22 And then, of course, you guys -- you guys sent me stuff, so I -- I hadn't even
23 remembered the other rallies, you know, or thought about them, I should say. So I
24 assume that it's Kylie Kremer and her mother, and then, like, they ran the whole thing.

25 Q Okay. Did you speak to Caroline Wren about the rallies?

1 A Yeah, I have. I mean, she was the one who invited me. Well, she was the
2 one who sent me information on it.

3 Q Okay. And did you --

4 A Between her and Kimberly.

5 Q Did you speak to Caroline about the details of the rallies, like, who funded
6 them?

7 A I don't remember about that. I mean, it -- you know, in hindsight, of
8 course, January 6th seems like a big day, but I don't remember having funding
9 conversations with Caroline about it, but maybe. That would've been just another thing,
10 because that's what she does, like, every single day of her life, so.

11 A There was a story written about it. You know, I don't -- anyway, I don't
12 remember. I think I sent that story along to you in the Daily Mail.

13 Q Were you with Caroline Wren on January 5th or 6th?

14 A Yes.

15 Q And were you talking to her at all -- first of all, when did you arrive in D.C.?

16 A Sometime on the 5th that I recall. I don't know what time. Yeah.

17 Q And were you with Caroline Wren most of the day on the 5th?

18 A I was with her quite a bit on the 5th and some part on the 6th, yeah.

19 Q So were you having conversations with her about someone named Julie
20 Fancelli?

21 A You know, I don't remember that really, but then it's what has been in the
22 story, so I can't -- yeah.

23 Q Do you remember --

24 A Again, now in hindsight, January 6th looks big. At the time, like, it's just
25 another thing, you know, so I don't remember.

1 Q Yeah. But do you remember talking to Ms. Wren about who would be
2 speaking at the events?

3 A I did talk to her about that, yeah, once -- or maybe twice, I don't know, but
4 yeah. Here's only my recollection, is, literally, all I remember, that -- or two things that I
5 remember. One is that it was somewhat chaotic, and nobody really knew who was
6 going to speak. And then two, that the President might speak and that the President
7 should not be on the stage with someone named Patrick Byrne who was totally crazy.

8 Q Okay. And that came from Ms. Wren?

9 A No, no. That was me. That's what I --

10 Q Oh, that was you?

11 A -- recall. That's what I recall. That's just my -- that's my feeling, and that
12 Steve Bannon once told me, he said, Patrick Byrne's crazy, and he should not be on the
13 stage with Donald Trump. And I don't -- again, I'm moving very quickly and not thinking
14 this is going to be any other day than anything else, so. That's what -- that's what I
15 remember.

16 Q And do you remember Bannon told you that about Mr. Byrne around -- was
17 it in that time period that he said that?

18 A I think so.

19 Q Okay. So did Mr. Bannon have any role working with the Kremers or
20 working with anybody else and organize the rallies?

21 A I don't -- I don't know what he did, you know, but he's not an organizer by
22 nature, that I feel. So I think they're the people, yeah.

23 Q Did you talk to Mr. Bannon about the rallies ahead of time, like, before
24 January 4th, earlier than that, sometime late December?

25 A You mean, the rallies, meaning, like, the November rally, December rally?

1 Q Sorry. No. In late December, very early January, like January 1st, 2nd,
2 were you talking to Mr. Bannon at all about the January 5th and 6th rallies?

3 A Here's what I think, and I can't remember the dates. I remember he
4 said -- this is what I remember, and maybe I'm, like, not 100 -- maybe I'm -- he said talk to
5 Kylie and the mother. And maybe they had reached out to me, I don't remember. And
6 then he said, talk to them, and I'm not going -- or maybe he didn't say, I'm not going. All
7 he said was, the President can't be on the stage with Patrick Byrne. That's all I
8 remember.

9 And it wasn't clear that the President was even speaking, but if he was, he can't be
10 on the stage with that crazy person.

11 Q Okay. Did Bannon --

12 A That's what Steve said.

13 Q -- did he represent anyone else that the President shouldn't be on the stage
14 with, like, Roger Stone or Alex Jones, Ali Alexander?

15 A All I remember was the Patrick Byrne, because I don't really know him. And
16 I'm not even -- I maybe met him once or maybe not even. But that's all I remember,
17 when I've gone back to try and remember what happened, that's all I remember.

18 Q Okay. Can we pull up exhibit 49, please, Richard. So exhibit 49 is a text
19 message between Kylie Kremer and yourself, but this came from Kylie Kremer. So you'll
20 see right there, this is from January 4th. It looks like you're just talking about, you know,
21 how to organize the rally.

22 The Kremers are complaining a little bit about the permitting process, and you say,
23 you know, we are here to amplify. When you said we, are you talking about Mr. Bannon
24 and War Room or somebody else?

25 A Yeah, no, I think it was -- I think -- I don't remember this text, but that just

1 sounds like talking about The War Room, which, I mean, like, just like I said, with Ben
2 Bergquam, who I don't know, but, you know, he goes and has somebody at the border
3 watching the people come across, and the guy films it and -- yeah.

4 Q So what exactly would amplification be?

5 A I just think, you know, just when you read this -- and I don't even remember,
6 it was one of 100,000 texts in my lifetime, but I just read that as it's about The War Room.

7 Q Okay. So using War Room as the platform to promote the rallies?

8 A Well, no, that's what I assume. I mean --

9 Q Right. As best as you could figure out.

10 A -- they were on -- they were on -- they were on the show.

11 Q Right. So as best as you can figure out these texts, amplify means The War
12 Room and using that for the rallies, but -- and nothing else?

13 A I can't think -- that's what my assumption is. I mean --

14 Q All right. Did you have any conversations with Mr. Bannon about being a
15 speaker at one of the many rallies on January 5th or 6th?

16 A I can't remember. Definitely, I don't recall on the 6th and --

17 Q He never made a mention of either wanting to or not wanting to be a
18 speaker?

19 A Oh, I mean, my feeling in general is, he, like, usually doesn't want to do
20 those things. I said the COVID, he was very -- this is just my feeling and my
21 recollection -- he was very, you know --

22 Q Hesitant about big crowds at the time?

23 A Yeah. And it's just -- I mean, some of this stuff -- yeah. So -- and, you
24 know, he usually doesn't ask to speak. People usually ask him, in general.

25 Q Right.

1 A Generally speaking.

2 Q And do you know if anyone asked him to speak?

3 A I mean, I share -- I shared those texts with you. I can't remember if they
4 did or not.

5 Q That's okay. Do you know if anyone else from War Room or other people
6 associated with Bannon, like Boris Epshteyn, were asked to be speakers at one of the
7 rallies?

8 A I think -- I think that Peter Navarro spoke at the eve -- on January 5th maybe.
9 It wasn't really my thing. I didn't work with them. So I'm not -- I don't really know. I
10 just told you that the one thing I recall is that Patrick Byrne, that's really stuck out in my
11 head.

12 Q Right. That's okay. So we're going to -- we'll walk through -- I want to
13 walk through with you a little bit on January 5th so we can see what was happening.
14 You mentioned you arrived in the afternoon, but before that, were you aware that
15 President Trump spoke to Mr. Bannon on the morning of January 5th?

16 A I can't remember. I mean, I gave you the -- the stuff that I would have, but
17 I can't -- I can't remember.

18 Q Okay. So --

19 A Yeah.

20 Q -- you didn't talk to him about any conversation the morning of the 5th?

21 A I don't remember. I just don't remember. And, again, like, in hindsight, it
22 was just like another day. You know, it wasn't -- then it became something,
23 unfortunately, awful. But I don't remember.

24 Q Okay. Were you aware of a meeting at the Trump Hotel in a room known
25 as the Trump Townhouse on January 5th?

1 A Yes.

2 Q Did you attend that meeting?

3 A Yes. Well, I atten- -- I was there for a little while. I'm not sure exactly
4 what is considered -- there was, like, a watch party, and there was a meeting.

5 Q Oh, can you explain the difference?

6 A Well, I'm not sure what -- all I recall, there was a watch party just on the
7 Georgia results.

8 Q Okay. And this was -- both of these things were happening in the Trump
9 Townhouse at the Trump Hotel?

10 A I think that -- yes, yes. And -- and they -- here's my recollection. They
11 wanted -- Caroline Wren wanted Steve to come and speak, and then I don't think he ever
12 came, but Peter Navarro spoke. But they just had -- it was just -- again, nobody knew it
13 was going to happen the next day. So it was just kind of, just going to be a party to see
14 the election results and that sort of thing.

15 Q For one of them, it sounds like, but for this other meeting, was anyone
16 asking Mr. Bannon to come make a presentation about something that day?

17 A Yeah. I think they wanted Steve to come and speak.

18 Q Okay. And was that separate from the watch party, is my question. So
19 was there a separate meeting, and do you remember what that meeting was about?

20 A No. I know -- I just think that it was, like, people were sitting around, and
21 they were just having VIPs come and speak. That's just --

22 Q Okay.

23 A I mean, I didn't organize it, so I don't know what, but that's just what I -- you
24 know.

25 Q That's fine. Do you remember who was there?

1 A I mean, I think -- I mean, I'm sure Caroline was -- I mean, I don't know what
2 time you mean, like who was -- who was there specifically. But, like, Caroline was there
3 and -- and, you know, Kimberly and Don were there for a little while, and, like, donors and
4 friends of theirs.

5 Q Do you remember any of the VIPs that came in and out besides Kimberly and
6 Don and --

7 A I'm trying to remember. I just remember this guy, Bill Bachenberg, was
8 there.

9 Q Was there anything specific about Mr. Bachenberg that stands out? No?
10 Okay.

11 A I mean, he's from Pennsylvania, so I think that's why.

12 Q Okay. And then generally, was this like a --

13 A [Inaudible.]

14 Q Oh, go ahead.

15 A Like, there was some of the staff people and --

16 Q Staff people for President Trump?

17 A Oh, no. I think it was just like, people like Caroline, like Maggie -- Maggie
18 Mulvaney and -- I'm trying to think of who the other donors were.

19 Q That's okay. So the purpose of this meeting, it was a fundraiser?

20 A No, I don't know -- I mean, I didn't organize it, so I don't know if it was -- it
21 was an actual fundraiser or it was just a meeting. You know what I mean?

22 Q Okay. And you don't remember anything specific discussed during this
23 meeting?

24 A I wasn't really in there. I don't even know -- I can't remember what time I
25 got there.

1 Q Okay.

2 A So I just remember they wanted Steve. I don't think Steve came. They
3 wanted Navarro. I think Navarro came. And I don't really remember -- and then, you
4 know.

5 Q Totally fine.

6 A Yeah.

7 Q So at some point -- I can pull up the exhibit or I can just represent to you that
8 Caroline Wren says there's an emergency at the Willard and Steve needs to come. And
9 this is on the night of January 5th. Do you remember what that emergency was?

10 A No. But I think that -- I think that she probably just meant a speaker
11 cancelled or something. That's what I feel like. That's what I feel like. When you say
12 that, that's what I have the feeling of.

13 Q And is that because she was talking to you about issues with speakers for
14 January 6th on the night of January 5th?

15 A Having to do with Steve? You mean, like, have Steve come to talk about
16 January 6th?

17 Q Just why you said the first thought was that this emergency had to do with
18 speakers. So I'm wondering if --

19 A I'm so sorry, yeah. I meant that she had these VIPs, and she was trying to
20 have them have a good time and see other VIPs and --

21 Q Okay.

22 A -- somebody cancelled. That's maybe my -- that's my recollect- -- maybe
23 I'm wrong -- making that up, but it's wrong, but that's my feeling.

24 Q All right. So it didn't have -- did this have anything to do with -- I'm sorry.
25 Did Caroline Wren ever express being upset that Roger Stone and Ali Alexander

1 and Alex Jones weren't going to be allowed to speak on January 6th?

2 A My only -- by the way, they may have talked to me about that, and I wasn't
3 organizing it and I don't -- I have -- I have no recollection of that. The only recollection
4 that I have is that Caroline was in charge of the VIPs.

5 Q Right.

6 A And that was her thing. And making sure the VIPs were happy. And there
7 was -- there was some, you know, conversation about VIP seating, and, like, this VIP
8 wanted a seat, and this one -- and there was some kind of back-and-forth with Kylie
9 Kremer about how VIPs -- but I don't really remember. I just remember something like
10 that, you know.

11 Q Got it. So were you with Ms. Wren on the night of the 5th in her hotel
12 room? You stayed with her?

13 A Yeah. We -- we were together commiserating after the mega loss on
14 Georgia, yes.

15 Q And do you remember if Dustin Stockton came by the hotel room?

16 A Yeah. We met him outside, and I think that's the first time that I -- he
17 explained to me that he -- it's the first time I talked to him in a while that I recall.

18 Q Okay. And I'm just trying to spur your memory a little bit. So was it at
19 this time that Ms. Wren was talking about the problems with the Kremers in terms of who
20 was speaking, or you just don't remember? And if you don't remember, that's
21 completely fine and --

22 A I don't remember. I mean, there was some, like -- because remember,
23 again, this is like no -- you know --

24 Q Yeah.

25 A -- every single Trump event rally I've ever gone to has been like a dance

1 party. So I just think it's another -- yeah, there were complaints and things, and maybe
2 that's what they were talking about. I don't know. I just --

3 Q Okay. Were you in contact with Mr. Bannon on the night of the 5th, or do
4 you know what he was doing?

5 A I'm sure we were in con- -- I mean, I'm sure we were in contact because it
6 was an awful night for the Republicans. And I can't remember exactly. I think he was
7 probably at home and -- you know. I'm sure he was probably at home. I'm not really
8 sure, but, you know, it was not a good night for Republicans.

9 Q So you weren't aware of a meeting at the Willard involving Rudy Giuliani and
10 Jason Miller, Bannon, and some other people?

11 A I mean, maybe -- I mean, I know maybe there was one and he wrote to me
12 and I gave you texts about it, but I don't really -- I don't remember what day it was. It
13 could've been the 5th.

14 Q Okay.

15 A Yeah.

16 Q So he didn't talk to you about calling Republican legislators about trying to
17 get them on board with not voting to certify the election on January 6th?

18 A I don't remember that. I mean, I can go back to -- I think I've sent those
19 texts from that exact day.

20 Q Yeah. We have some from the 7th about security which I want to get to.

21 A Yeah.

22 Q This was just -- I mean, I'm really trying to be mindful of your time. It's just
23 in Peril, there's a report about a meeting on the 5th where Steve Bannon was prodding
24 Republicans in Congress by phone to join forces with Trump on January 6th. So I just
25 didn't know if he had spoken to you about that.

1 A I don't recall. He may have. And that sounds like what the Green Bay
2 Sweep, the way you're saying it, and, again, I didn't read the book --

3 Q Sure.

4 A -- not because I'm a dummy, just because I don't -- you know.

5 Q That's okay. Thank you.

6 A But he -- he may have, but I don't recall the details and -- you know.

7 Q Totally fine. The morning of January 6th, did you help Steve Bannon
8 connect with the President?

9 A The only way that would ever happen would've been through Molly or
10 Johnny that I can recall. So if it's in the text messages --

11 Q So you don't recall connecting him with Vice President -- or trying to connect
12 him to Vice President Pence?

13 A Somebody -- I thought you said the President. You're saying the Vice
14 President?

15 Q I did say the President. Sorry. I said the President first, and you
16 explained, which it sounds right, that you would've worked through Molly. Were you
17 also trying to connect Mr. Bannon with Vice President Pence?

18 A I feel like I've -- either that was mentioned to me or it was in a story
19 somewhere or something. But I can't remember, because it may -- it may have
20 happened, but I think that --

21 Q Well, if you could pull up exhibit 8 really quickly and go to page 80, it's a text
22 with Molly.

23 A Yeah.

24 Q And --

25 A Oh, that's -- yeah, okay, right, the one that I gave you, yeah.

1 Q Yeah, these are from you. And -- okay. It seems on page 80 that Steve
2 had -- Mr. Bannon has asked you to connect him with Vice President Pence --

3 A Yes. Yeah.

4 Q -- because the President asked him to talk to Vice President Pence on the
5 morning --

6 A Okay.

7 Q -- of January 6th.

8 A Yeah.

9 Q Do you remember that conversation at all?

10 A Well, I don't remember the conversation, but I remember these texts. I
11 gave you these text messages. I just forgotten -- you know, we're doing this for a couple
12 of hours. I just forgotten whether -- how it was, but I remember giving you that and
13 seeing that text message.

14 Q Okay. But you don't remember the conversation you had with Mr. Bannon
15 about why the President wanted him to speak to Vice President Pence?

16 A I don't remember. You know, I mean, obviously it was about what was
17 going to happen that day later. I would make that assumption, but I -- you know, I don't
18 want to assume because I don't -- I don't remember, but -- you know.

19 Q But Mr. Bannon didn't talk to you about trying to get Vice President Pence to
20 not certify the election?

21 A He may have. He may have talked to me about it. I don't remember.
22 You know, he's asking me to do something, okay, I'll do it.

23 Q Right.

24 A And -- but, again, not my -- not my line of country.

25 Q No, that's okay. You went to the rally on January 6th, correct?

1 A Yes, I did.

2 Q And you stood near the front, had a good view?

3 A Yes.

4 Q Do you remember seeing Ginni Thomas there?

5 A I don't.

6 Q Okay.

7 A I don't remember that. I mean, she may have been there, but I don't
8 remember it.

9 Q That's totally fine. And did you start walking to the Capitol after the
10 speeches at some point?

11 A No. I only walked -- I was walking to the Trump Hotel. It was
12 bitter -- again, nobody -- January 6th only became January 6th tragically later on. So the
13 only thing -- I almost left the rally and the Ellipse because it was so cold. And so, my
14 recollection is, you just want to get inside, get something to eat, and warm up.

15 Q Understood. Around 3:30, I'll represent to you -- if you want, I can pull up
16 one of the exhibits -- that you had a -- like, a couple-minute conversation with
17 Mr. Bannon at around 3:30. Do you remember what you were talking about on
18 January 6th?

19 A I don't. I mean, I don't. I can tell you what I remember --

20 Q Sure.

21 A -- of my timeline or --

22 Q Well, specifically about your interaction with Mr. Bannon, do you remember
23 what you were talking to him about that day?

24 A No. What time did -- what time did the attack happen?

25 Q His first call is at -- the attack started -- the first breach was around

1 12- -- there's a lot of activity, but things really start accelerating around 12:20 in the
2 afternoon.

3 A The only conversation was whether it was via the phone or via text, was
4 when he told me to get to the Willard. So what I recall was being afraid and kind of not
5 knowing what was going on. And so, that's what I did at some point, first went to the
6 Trump Hotel and the Willard. I was thinking about going back to Pennsylvania, and, you
7 know --

8 Q Okay.

9 A -- I don't really remember. The -- the only I remember is he saying, get to
10 the Willard, and you just kind of -- remember, also, by the way, that it was the COVID, and
11 so restaurants would be closed, and places were --

12 Q Right.

13 A -- you know.

14 Q Got it. That's fine. Do you remember talking to Mr. Bannon about some
15 security meeting he was having with Rudy Giuliani that day? And we can pull up exhibit
16 10, page 224. I think this is what you were referring to when we were talking about
17 January 5th, the meeting between Trump and other people that you produced.

18 A Okay.

19 Q And this text message on January 6th, it's after the attacks and you're trying
20 to -- I think it looks like you're trying to get back to a hotel or figure out where
21 Mr. Bannon is. And he says, you know, I'm with Rudy or the security team. Do you
22 have any sense of what was going on with Mr. Bannon at that time?

23 A That is January 5th?

24 Q January 6th. This is January 6th. Yeah, it's exhibit 10, page 224.

25 A So is that what you meant -- you were asking me -- yeah.

1 Q Scroll down a little bit. So we can keep going. He's at -- Mr. Bannon's at
2 the Willard. Scroll down a little bit more. Can't -- Rudy security meeting to go to the
3 Willard. Do you know --

4 A Wait a minute. Would he -- no, I think that he was saying he's not there,
5 that I should go there. Can you bring it back again? I mean, my recollection was --

6 Q He then says, I'm going to Willard to work with the team. Rudy at Trump, I
7 imagine, Hotel with Kimberly Guilfoyle and the donors, will meet me at the Willard. So
8 can you -- do you have any -- do you know what was going on here?

9 A Well, can -- that's -- I mean, that's -- I mean, is that January 5th? Because
10 Kimberly left --

11 Q No, this is January 6th. This is after the attack.

12 A Okay. Kimberly was gone.

13 Q Yeah. So --

14 A I don't think that he's -- I don't think that's right.

15 Mr. [REDACTED] Yeah. If I could jump in, it's not clear. You know, this is the order
16 that we got the pictures in. I mean, I said pictures. Excuse me. This is the order that
17 we got the texts in. So you can see it's page 224 and then 225 --

18 Ms. Preate. Okay.

19 Mr. [REDACTED] -- but we don't have a date on that page 225, and it's possible that's
20 out of sequence.

21 Ms. Preate. Yeah. I think it might be out of sequence because I know for
22 certain because, Mr. [REDACTED] you mentioned about Kimberly, and she's, like, come to
23 Florida. That was, I think, the day before, because he -- she was already gone.

24 BY MR. [REDACTED]

25 Q So it's possible this is -- this is actually about January 5th.

1 A What I tried to do was to make sure that you guys could see that the
2 conversation -- so you could easily see from one page to the next. So sometimes I
3 double-copied it because it was in the middle of conversation.

4 Q Got it.

5 A So I think that's maybe why --

6 BY MR. [REDACTED]

7 Q But this one doesn't double-copy. That's the point, right? So usually you
8 did do that so we can see it roll over --

9 A Yeah.

10 Q -- but you see on 224, it says Maria wants to have Steve on with Peter on
11 Sunday for two long blocks.

12 A Yeah.

13 Q And then on 225, it starts with something and easy to get around, can you
14 come if that's the case, it says.

15 A No. That -- that -- that must be January 5th, because they were wanting
16 him to come speak. Where it says, Rudy's here, you can't come for 10 minutes, it's so
17 easy, meaning, come and speak. Rudy at Trump with KG and donors, will meet at the
18 Willard.

19 So I think he's saying, no, I won't come and meet with the donors and speak. I'm
20 meeting Rudy later. Rudy right now is with Trump and KG with the donors. I'll meet
21 him later. We'll meet Rudy later at the Willard. I think that's what it means.

22 Mr. [REDACTED] Well, thank you. Thank you for clarifying that. That makes --

23 Ms. Preate. He sometimes -- you can see he talks very shorthand. I think that's
24 what that --

25 BY MR. [REDACTED]

1 Q Now, I will say, just to stay on page 225 at the bottom --

2 A Yeah.

3 Q -- it's confusing, and maybe my staff need to check your phone at some
4 point, not now. I know you got to catch your flight, but at some point to try and sort
5 this out because it does say, at the bottom of 225, No, stop, takes a police escort to get
6 through the Willard, and Pence/Short have effed this all up.

7 So the Pence/Short thing, not clear that would've been happening on the 5th, but
8 it's something we should have you --

9 A I think -- no, I think, here's the thing. No, stop, means, stop asking me to go
10 meet the donors, for sure.

11 Q Yeah.

12 A That's -- that's -- I mean, at least -- I can't recall this text message till I gave it
13 to you. I just know that's his language -- no, stop.

14 And then when it says, Pence and Marc Short effed this all up, I don't know what
15 that means exactly, but I -- I would assume, based upon the questions that you asked me,
16 what I recall about the Green Bay Sweep, I mean, I just -- I have no idea actually what he
17 means. I shouldn't say that. I don't -- I don't know.

18 Q Okay. Well, we might ask you -- I don't want to break up what [REDACTED] is
19 doing here, but I think we might ask you to just look at those texts again and see if we can
20 just get --

21 A Yeah.

22 Q -- the sequencing right.

23 A I will, sure. Absolutely.

24 Mr. [REDACTED] Appreciate it, [REDACTED]

25 Ms. Preate. I can take another picture and then send it to you.

1 Mr. [REDACTED] Okay, great.

2 Ms. Preate. Yeah.

3 BY MR. [REDACTED]

4 Q You anticipated where we're going. So I'm going to run through a couple
5 things very quickly because I know [REDACTED] has a couple questions, and we want to be very
6 mindful of your time. So if we could pull up exhibit 58, page 293. So just so you know,
7 we're now after January 6th, and these are conversations that you and Mr. Bannon
8 had -- can you hear me?

9 A Yes, I can hear you.

10 Q Okay.

11 -- conversations that you and Mr. Bannon had after the 6th about what was going
12 on. One second. Okay. I think I can -- can you guys still hear me?

13 A Yeah.

14 Mr. [REDACTED] Yeah.

15 Mr. [REDACTED] All right, good.

16 Q So on 293, Mr. Bannon says, Of course we told him to ramp it up, and this is
17 in response to an article being wrote -- written about his conversations with the President
18 about January 6th. Did Mr. Bannon like to take -- did he take credit for a lot of the
19 activity on January 6th?

20 A What do you mean "take credit for"?

21 Q So it says that you're representing the article at the time, and I -- so I will be
22 that you and Rudy are bad influences, that you're trying to represent what this article is
23 going to be. It's being written about January 6th.

24 A Oh.

25 Q And he responds, of course. We told him -- President Trump -- had to ramp

1 it up. Do you remember talking -- did Mr. Bannon speak often about how -- about his
2 involvement with President Trump on January 6th?

3 A I don't remember. I mean, I -- I'm -- I don't recall talking much to him about
4 January 6th. I was horrified and depressed about it. I -- so, you know, in the
5 story -- and I can see what the -- what the article was.

6 Q If we scroll up a little bit, you can see it, but it's more important if you just
7 remember. It's not so important the specific article, but I think it was --

8 A Oh, okay.

9 Q -- it was just an -- something about how someone reported all the
10 conversations that Mr. Bannon was having with President Trump in the days before the
11 election.

12 We'll move on to exhibit 12 at page 280. So he says, we -- right there. That's
13 the -- we wanted. And you scroll down a little bit. Then you ask, what, we won the
14 election. And he says We now take charge. Do you know what Mr. Bannon was
15 referring to when he says we now take charge?

16 A I don't remember what that was.

17 Q Did he mean take charge of the Republican Party? Did he mean --

18 A I mean, that's what I guess he means. I don't really remember.

19 Q Did he mean take charge of the country's political system?

20 A What day was that? I don't --

21 Q Oh, let's scroll up a little bit. Sorry. I'm trying to move fast for you so you
22 can --

23 A No. I know, I get it. I get it.

24 Q But, no, it's appropriate. Definitely need to know what date.

25 So if we scroll up a little bit more, we can get to the date, [REDACTED] I believe from

1 my memory, it's January 7th or 8th, but keep scrolling up, until we see a date.

2 A Oh, Holly. He says Holly there. Yeah.

3 Q It's January 8th.

4 A Okay. Then --

5 Q So do you have a sense of whether he meant take over the -- you know,
6 American politics or -- no? That's okay. We'll move on.

7 A Yeah, I don't know. Yeah.

8 Q Okay. Exhibit 9, please. Last one. Page 89. We'll start there. We
9 must turn up the heat. And then if we keep scrolling down, you say, Trump's in town
10 and when he's leaving. No way, maybe he does, maybe he don't. And Mr. Bannon
11 then says, He's not staying in the White House after the 20th. But who says, we don't
12 have one million people the next day?

13 A Uh-huh.

14 Q What is he talking about?

15 A I don't know what he was talking about, but I think that he's just saying that,
16 you know, people would be very -- would be out there and, you know, marching or
17 standing there or something like that. But I -- I really don't know. That's --

18 Q If we scroll down a little bit more to the next page --

19 A Yeah.

20 Q -- he says, Well, I'd surround the Capitol in total silence.

21 A Okay, yeah.

22 Q Did Mr. Bannon talk to you more about bringing people back to Washington,
23 D.C., even after January 6th?

24 A I don't recall that, and, you know, I don't -- you know, I don't -- that's not
25 something I'm interested -- and I -- I don't -- I don't agree with. Look, I've already said

1 this so many times so I don't want to waste your time on that, but --

2 Q No, I understand your views.

3 A -- I'm not entertaining -- it's just not my deal, as I told him in that text
4 message, not my deal. I just -- I think that the -- you know --

5 Q Right.

6 A -- the President needs to leave and then -- you know.

7 Mr. [REDACTED] So, [REDACTED], I'll kick it back to you. Sorry if that took a little bit of time.

8 Mr. [REDACTED] No, no. No worries.

9 BY MR. [REDACTED]

10 Q So there's a couple topics I just want to touch on with you, Ms. Preate, and
11 just tell me, you know, yes or no, whether you know anything about this stuff. So
12 there's been some reporting, discussions over the years about Mr. Bannon's involvement
13 or awareness of QAnon.

14 A Uh-huh.

15 Q I think at some point, someone, Ron Watkins maybe, was even sort of
16 floating the idea that -- that Mr. Bannon was Q, and was responsible for posting these
17 messages regarding QAnon. Are you aware of any of that sort of speculation or talk
18 with respect to Mr. Bannon's role in QAnon?

19 A Am I aware of people talking about him as being QAnon?

20 Q Yes. Or being somehow affiliated with QAnon?

21 A Yes. Yeah, I've heard people say that.

22 Q Have you ever discussed it with him?

23 A He's mentioned -- we've -- we have discussed that before.

24 Q And tell me what those discussions have involved?

25 A He absolutely is not. Yeah, just absolutely not.

1 Q Okay. But he's told you, can you believe this, you know, people say I am or
2 things like -- along those lines?

3 A I mean, as I said earlier, we don't have these long conversations that I have
4 with, you know, like I'd talk to a friend of mine, but -- no, it was just kind of like, no, I'm
5 not QAnon. It's -- you know. He's said it multiple times to me. Not multiple, but
6 more than one occasion, of course, no, I'm not.

7 Q Did he ever share his views with you about the QAnon movement, if I can
8 call it that?

9 A We have talked about it, and I don't remember, like, details, but he did say
10 there, you know -- all I remember is one time his being surprised about how many people
11 actually talk about it or think about it or know about it.

12 Q Did he ever talk about how that message or that movement might actually
13 be helpful or -- politically helpful?

14 A I don't remember having that conversation, but this conversation, again, that
15 I remember having is that he recognized that it was -- it was -- that people did read that
16 stuff or whatever that is. I'm not -- I don't know what QAnon really is myself, but.

17 Q Okay. Did he ever talk to you about trying to distance himself from that,
18 from those folks at all?

19 A I don't remember. All I remember is that he -- that he said he wasn't -- and
20 I never thought he was, myself. I just knew -- and that he was, like, it's -- it's a -- there
21 are people that actually read it. But I don't remember his -- those are the two things
22 that stick out in my brain that are significant. Like, he's a smart, political analyst, and
23 he's saying, people listen to it. But how many people that is, you know, for real, I have
24 no idea and -- what that is.

25 Q Well, okay, I guess that's -- I'm getting to sort of that next step, given what

1 you just said about his strategy and political -- how he thinks of these movements and
2 politics and so forth. Did he ever express, Hey, this is something that maybe we can tap
3 into, or that we need to be aware of, or that we need to be speaking to, anything along
4 those lines?

5 A You mean, speaking to the people that believe that QAnon is real? I
6 mean -- well, I mean, I think just his saying that there are people that listen to it. I don't
7 really know what QAnon talks about myself. I don't really know. I mean, I know
8 there's people that have wild conspiracy theories, and I guess that he's part of it, and
9 there's some, you know, weird stuff there.

10 Q Okay.

11 A You know.

12 Q We'll move on to something else. TheDonald.Win, which I think at some
13 point was a sub Reddit, and then became a website. Do you know anything about
14 TheDonald?

15 A Can you remind me what that is?

16 Q Well, it's become a website called TheDonald.Win, and it's an account where
17 there's a lot of information posted about supporting President Trump. There's a lot of
18 chatter on that site about January 6th, leading up to it, and I'm wondering whether
19 you've ever heard of it.

20 A That you say that now, it sounds a little bit familiar, but I don't recall it. It's
21 not some site that I go to.

22 Q Do you know if Mr. Bannon has any affiliation with that site or whether he
23 has a user name on that site or uses that site?

24 A Is it, like, a website, like -- like -- like Newsweek.com? Is that what it is or --

25 Q No. I think you actually need to be able to sign into it and post to it.

1 A Oh, I don't know. I really don't know about what it is.

2 Q Okay. James asked you a little bit about the Oath Boys -- excuse me -- the
3 Oath Keepers and the Proud Boys.

4 A Right.

5 Q There was, I think, an episode around the 5th or so of The War Room in
6 which Mr. Bannon talked about putting out calls to try and bail out Enrique Tarrío as the
7 head of the Proud Boys. Do you know anything about that?

8 A I know -- that rings a bell. I don't remember when he said it or what it is.
9 I just remember he's talked about people that are in jail and need to be bailed out or
10 something like that. I don't remember -- now that you mention his name, it sounds
11 familiar, but I don't really remember the details of what -- about that sort of thing.

12 Q Do you know if he has any sort of relationship with Mr. Tarrío?

13 A No. I don't know. I don't really -- it's not my -- my impression is, the
14 Proud Boys are bad and the Oath Keepers are bad, and after that, I don't really spend my
15 time in that world of talking about that stuff to me. I don't know.

16 Q Yeah. Just wondering whether you know if Mr. Bannon has any sort of
17 relationship there?

18 A Not to my knowledge.

19 Q Or with that particular individual?

20 A Not that I -- not that I know.

21 Mr. [REDACTED] Okay. So we are over our appointed time, but I think if we stop
22 now, you're going to be okay.

23 Ms. Preate. Okay.

24 Mr. [REDACTED] Let's go off the record.

25 [Whereupon, at 3:32 p.m., the interview was concluded.]

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Certificate of Deponent/Interviewee

I have read the foregoing ____ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

Witness Name

Date