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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: CHRISTINA BOBB

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15 Thursday, April 21, 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 11:04 a.m.

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2 Appearances:

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5 For the SELECT COMMITTEE TO INVESTIGATE

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

7

8 [REDACTED], SENIOR INVESTIGATIVE COUNSEL

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19 FOR CHRISTINA BOBB:

20

21 JOE SIBLEY, ESQ.

22 Camara and Sibley, LLP

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2 [REDACTED] It's 11:04 a.m. Eastern time here in Washington. This is a
3 transcribed interview of Ms. Christina Bobb conducted by the House Select Committee to
4 investigate the January 6th attack on the United States Capitol pursuant to House
5 Resolution 503.

6 At this time I would like to ask you, Ms. Bobb, to introduce yourself, stating your
7 name and spelling your last name for the record.

8 Ms. Bobb. Christina Bobb, last name B-O-B-B.

9 [REDACTED] Thank you, Ms. Bobb. And if, Counsel, if you could please identify
10 yourself as well.

11 Mr. Sibley. Joe Sibley of Camara, C-A-M-A-R-A and Sibley, LLP, in Austin, Texas.

12 [REDACTED] Very good. So I know I mentioned this to Mr. Sibley, but as of
13 right now, the only participants here are you, Ms. Bobb, and Mr. Sibley. Is there
14 anybody else with you in the room, Ms. Bobb?

15 Ms. Bobb. No. I am alone.

16 [REDACTED] Okay. Thank you. And, Mr. Sibley, I know I mentioned this to
17 you as well, but we can't permit you on your end to record or transmit anything. So can
18 you just confirm that that's not happening either through you, Ms. Bobb, or you, Mr.
19 Sibley.

20 Mr. Sibley. That's confirmed on my end.

21 Ms. Bobb. -- as well.

22 [REDACTED] Okay. You've confirmed that as well? Okay. I appreciate that.
23 Thank you.

24 And, Mr. Sibley, do you anticipate anybody else joining on your end?

25 Mr. Sibley. No.

1 [REDACTED] Very good. So this is going to be a staff-led interview. As I said
2 before we got started, my name is [REDACTED]. I'm a senior investigative counsel for
3 the Committee, and I'm joined today by [REDACTED] to my right, and [REDACTED]
4 to his right.

5 Members of the Select Committee may be joining us and leaving us. You'll see
6 them show up on the participant list in the Zoom platform, and I will try my best to
7 announce them as well and their presence so that you are aware of them. You'll see
8 right now we have other committee staff as well, including our chief clerk and others.

9 Before I begin, this is not a deposition. It is a transcribed voluntary interview,
10 but we do have a few ground rules. There is an official reporter who's transcribing this
11 interview who shows up in the WebEx platform participant list as well. It's also being
12 recorded, but the official record is the transcript prepared by the reporter.

13 You and Mr. Sibley will have the opportunity to review that transcript after we are
14 done and suggest any corrections before it's finalized, but because it's being taken by a
15 reporter, it's very difficult sometimes, particularly over the Zoom or WebEx platform that
16 we are on today, if we are speaking over each other. So I just ask that you let me finish
17 my question before you answer, and then I in turn will let you finish your answer before I
18 ask my next question.

19 Also the stenographer also can't take down non-verbal responses, like shaking
20 your head. So it's important that you answer each question with an audible, verbal
21 response.

22 Ms. Bobb. Is this also being recorded?

23 [REDACTED] It is being recorded by the platform itself. Correct.

24 Ms. Bobb. Okay.

25 [REDACTED] You are not going to be placed under oath, but because you are

1 speaking to a committee of Congress, there are possible consequences for providing any
2 knowing false statements, and that is codified under 18 USC 1001 as other federal
3 criminal statutes. So it is important that you tell truth at all times.

4 Do you understand everything we have gone over so far, Ms. Bobb?

5 Ms. Bobb. Yes.

6 [REDACTED] Also I know that some of the events that we are going to be talking
7 about took place over a year ago now. And if you don't recall something, please let us
8 know that. Also if my questions or anybody's questions aren't clear, or you need
9 clarification, please ask us to do so. We'd be happy to. We much prefer that you
10 answer a question that you understand, rather than trying to guess at one you don't.

11 I talked to Mr. Sibley and understand that your role as a lawyer may have some
12 potential privilege issues or raise privilege issues throughout the day, and that's okay.
13 Let us know that, and we may have some questions about the scope of the privilege, or
14 who is a part of the communications. But if there is an objection, Mr. Sibley, I
15 understand that you will weigh in or Ms. Bobb weigh in and express that.

16 Under the circumstances, you can only refuse to answer a question to preserve a
17 privilege. And if there are other refusals that you make or, excuse me, if you decide not
18 to answer a question, what we would likely do is have a conversation with Mr. Sibley to
19 discuss that.

20 Given that this is a transcribed interview, we cannot seek like a ruling from the
21 chairman on objections, but if we need to move this to a deposition, the Committee
22 reserves its right to do that. I think that that's unlikely based on the conversations with
23 Mr. Sibley, but I do want to just make you aware of that as well.

24 If you do need to consult with Mr. Sibley at any time, please let us know. We are
25 happy to give you the time you need for that of course, as well as any other comfort

1 breaks, and at some point lunch or a longer break to eat, if you would like. If you do
2 decide you need to speak with Mr. Sibley, I think our suggestion is that you go off camera
3 and on mute so that we don't have any possibility of overhearing what either one of you
4 are saying.

5 All right. With that said, do you have any questions about what we just went
6 over?

7 Ms. Bobb. No, sir.

8 [REDACTED]. Okay. Mr. Sibley, are you okay to proceed?

9 Mr. Sibley. Yes.

10 EXAMINATION

11 BY

12 Q All right. So the first thing we'll show you is what we have as Exhibit 1.

13 It's a subpoena that we issued to you, or the Select Committee issued to you in March of
14 this year.

15 A Okay.

16 Q Zoom out just a bit. Okay. Does that look like a copy of the subpoena
17 that you received from the Select Committee earlier this year, Ms. Bobb?

18 A It does. I don't have my copy in front of me, but it looks like it's probably
19 the exact same thing.

20 Q Okay. And part of this subpoena required you to produce documents and
21 information including electronically stored information that's requested on the schedule
22 of the subpoena.

23 Did you search for information to provide in response to this request in the
24 scheduled subpoena?

25 A Yes.

1 Q And have you produced to the Select Committee all documents and
2 communications in your possession, custody or control that are responsive to the request
3 and the subpoena, and that includes anything that you would have logged on a privilege
4 log?

5 A To the best of my knowledge, yes.

6 Q Okay.

7 A What I was aware of and what I could find on my computer or with my
8 lawyer.

9 Q All right. And to the best of your knowledge, you are not withholding
10 anything, meaning you didn't turn it over or didn't include an entry for it on your
11 privileged log, correct?

12 A That's correct.

13 Q All right. We have one email address and we'll look at that. I believe you
14 produced documents related to that, some combination of your name, and an email
15 address.

16 Did you use any other personal email accounts, Google, email, Yahoo --

17 A No.

18 Q -- anything at all that might include documents relevant to the request?
19 And the time period I generally specify for these purposes would be roughly October of
20 2020 through January of 2021.

21 A No. Not intentionally. And if I did, I would have corrected it and put it
22 back on that email chain.

23 Q Okay.

24 A But I do not think there's any other emails out there.

25 Q And did you have -- I understand you worked for OAN for a period of time,

1 including that period that I just mentioned.

2 A Yeah.

3 Q Did you have an email account through them that would have had any
4 potentially responsive documents?

5 A I did have an email account for them, but I was not doing any work for OAN
6 on these efforts, and so I tried very hard to keep those separate. There may have been
7 a couple occasions where, you know, I made that mistake, but I did -- as best I could, I
8 kept them separate. And in the search I also searched my OAN email to see if
9 something has spilled over. And I believe I have turned everything over.

10 Q Excellent. And the email account that I mentioned earlier, the personal
11 one you had or that you used, it was [REDACTED] at
12 [REDACTED] right? That's the email address that you primarily used?

13 A That's correct.

14 Q Okay. Did you have that email account -- was that through a consulting
15 entity or some kind of entity that you set up?

16 A It was an entity that I was going to set up before I started working for OAN.
17 And then I worked for OAN, so I never put it together, but I kept all the email.

18 Q So was that email address specifically set up for your work related to the
19 election of Mr. Giuliani?

20 A No. It existed prior to that.

21 Q In that period that we talked about, that October 2020 roughly through
22 January 2021, how many cell phones do you remember using?

23 A One.

24 Q And is that the cell phone that is associated with the number with area code
25 [REDACTED] if I'm not mistaken?

1 A That is correct.

2 Q Okay. And did you search that phone for responsive information and
3 documents?

4 A Yes.

5 Q Did you ever get a campaign-issued or Giuliani-issued phone during that
6 period?

7 A No.

8 Q Did you use any messaging applications like Signal, Telegram, What's
9 Up -- excuse me, WhatsApp or Facebook Messenger during that period?

10 A Yes. Definitely Signal. I don't think WhatsApp. I think Signal is the
11 only -- I think just Signal.

12 Q And I understand there are some messages that are logged on the privilege
13 log. Did you look through Signal to provide or search for information responsive to the
14 subpoena?

15 A Yes. The messages that I logged were from Signal.

16 Q Did you keep any handwritten or electronic notes during that period, work
17 documents, scraps of paper or journals, anything like that at all?

18 A To the extent that I did, it would have been attorney work product, and I
19 turned everything over to my lawyer.

20 Q Okay. Any follow-up on that? Very good. Then, if you don't mind, we
21 can get started after that period by summarizing your professional background leading up
22 to your work with Mr. Giuliani related to the election.

23 A Sure. Right out of law -- so I graduated law school in 2008, I think. Passed
24 the bar in the smart end of 2008. Did a very brief stint in juvenile dependency work
25 while I was waiting to join the Marine Corps? You know, there's a waiting period. So I

1 did that probably six months.

2 Then I went to officer candidate school, the basic school, Naval Justice School. I
3 was an attorney at Quantico, judge advocate at Quantico. Then I deployed with Second
4 Marine Division to Afghanistan for a tour, came back from Afghanistan, was a criminal
5 defense attorney in the Marine Corps for the year or so before I got out. Went home to
6 San Diego, worked at the law firm Higgs Fletcher and Mack for probably somewhere
7 between three and four years, and went back into the Marine Corps after that.

8 I mobilized as a reservist in Stuttgart, Germany. I lived there a year and a half
9 working on military issues and operations. And then I -- when I was done with that, I
10 went to Washington, D.C., where I got my LLM at Georgetown in national security law.
11 And from there, I joined the Trump Administration. And then from the Trump
12 Administration, I went to OAN.

13 Q The Trump Administration, are you talking about your period at DHS,
14 Homeland Security?

15 A Correct. I was a political appointee at DHS.

16 Q What was your role specifically?

17 A I was the Executive Secretary at the Department of Homeland Security.
18 And then I had a very brief stint as the Executive Director of Policy at Customs and Border
19 Protection, but the vast -- that was at the very, very tail end. Most of my time was as
20 the executive secretary.

21 Q What was your day-to-day like as executive secretary, what roles and
22 responsibilities?

23 A I was responsible for the information flow throughout the department, and
24 primarily what was going to the Secretary, making sure that the information had got to
25 the Secretary, had cleared all of the people that needed to see it, the policymakers, the

1 lawyers and all that.

2 I had a staff of probably 50 people, plus the executive secretaries at the
3 components, like at CDP, ICE, CIS, all, you know, all of the DHS components. And we just
4 made sure that the Secretary was getting the best, most accurate information.

5 Q And who was the secretary at that time?

6 A I served under Kirstjen Nielsen, Kevin McAleenan and Ed Chuckles (ph).

7 Q And after that, you've mentioned a brief stint at CBP. After CBP did you go
8 and work with Mr. Giuliani?

9 A No. After CBP that was -- I left -- I left from CBP. That was when I left the
10 Administration in like February 2020. And then I joined OAN a couple months after that.
11 And so I joined -- I started working for OAN, I think my first day was June 1, something like
12 that, 2020. And I did not work with Rudy until mid November -- well, early-to-mid
13 November 2020. So it was after the election that I started working with him.

14 Q Do you remember a date when you started working with him roughly?

15 A It would have been about November 15-ish, something like that.

16 Q So after the election was called, at least by the Associated Press?

17 A Correct.

18 Q And how did you connect with Mr. Giuliani, start working for him?

19 [crosstalk]

20 A -- as a reporter, and then television interviews with him. And then when I
21 saw that he was taking up, you know, the election question, I just reached out to him and
22 said, hey, do you need help. I'll volunteer my time to help on your legal team. He
23 needed help.

24 Q And was your outreach specifically related to your potential role as an
25 attorney --

1 A Yeah.

2 Q -- or was it related to like a media or a --

3 A No.

4 Q -- PR aspect?

5 A Without the lawyer there was this -- we were very specific that any work
6 that I would do with him would be subject to attorney-client privilege. He didn't want to
7 record it. I would have had to get -- because you don't want attorneys going and
8 reporting everything on the news.

9 So he was like I need help. I'll let you help me, but you to have to abide by your
10 ethical obligations as a lawyer. And to the extent there's a story in this, you know, you
11 have to get permission before you share it.

12 I was fine with that. I talked to the network about it. The network was fine
13 with that, and that was it.

14 Q And the network being OAN?

15 A Yes.

16 Q So you stayed on with OAN technically?

17 A Yeah. Yes. My time was very short -- well, I mean, my time on this issue
18 with Rudy was very short. It was from like mid November till roughly January 6.

19 Q Did you have to take a leave of absence from OAN, any kind of formal
20 separation in order to do this?

21 A No. There was no formal separation. And I did still -- to the extent that I
22 could, I was still reporting on other topics. Or if I talked about election integrity, it
23 wasn't any privileged information, but I -- I continued reporting.

24 Q And when you went to the campaign based -- in your understanding were
25 you representing President Trump in his capacity as a candidate, the organization,

1 meaning the campaign itself, Mr. Trump personally, or some combination thereof?

2 A I signed a nondisclosure agreement with the Trump campaign. So I would
3 have worked for the Trump campaign.

4 Q And did you also receive an engagement letter or was it just that NDA that
5 you signed with the campaign?

6 A The NDA. To my recollection, it was just the NDA.

7 Q So when you came in in that mid-November time frame, what was your role?

8 A As a lawyer.

9 Q Who were the other people who were also on the team you joined?

10 A Well, to the -- I'm not sure, like how much detail I can get into, but
11 your -- most of the people are public, so like Jenna Ellis, Boris Epshteyn, you know, Rudy
12 Giuliani. I mean, those were the main lawyers working on it.

13 Q And I assume, but I don't want to assume that you reported to Mr. Giuliani;
14 is that right?

15 A Correct.

16 Q Is there anybody else you reported to?

17 A I wouldn't say reported to. I mean, I worked with other people. I worked
18 with Boris. I worked with Jenna. But I wouldn't say that I reported to them.

19 Q Okay. So no strict hierarchy beyond kind of reporting to Mr. Giuliani and I
20 assume ultimately the candidate himself?

21 A Correct. I never -- I mean, I didn't even know President Trump at the time.
22 I did not report to him certainly.

23 Q Okay. And your role as lawyer, did you have a certain portfolio? I mean,
24 there were a number of states at issue, and we'll get through some of them, but were you
25 looking at anything particularly?

1 A I'm a little -- I'm not sure how much detail I can get into without breaking my
2 privilege, but I think what's publicly out there is I worked on Arizona, Michigan, and to a
3 small extent New Mexico.

4 Q Okay. And I was going to say, so Mr. Giuliani has been deposed in
5 coordination or in association with the lawsuit that's pending in Colorado. And he said,
6 and I'll just read that for you if it's helpful, he said that you, Ms. Bobb, came over to the
7 campaign and offered to help us. She, by process of elimination, gathered a lot of
8 information about Arizona, Michigan, I don't know about Georgia, but she eventually got
9 involved in Georgia.

10 Is that accurate insofar as --

11 A Yeah. I would not -- I did get involved in Georgia but not until later. And
12 that was probably more from a reporting perspective, but yeah. I mean, he's not wrong.

13 Q And Mr. Giuliani also mentioned the same deposition that you had a role, at
14 least some role with Nevada, looking into issues with Nevada; is that right?

15 A Yeah. That's probably fair to say.

16 Q So in my role here, I'll just offer this to you, I'm a senior investigative
17 counsel. So there's an investigative component to it. There's a lawyer component to
18 it, and they are very much intertwined, but could you explain what your role was? I
19 mean, did you have investigative responsibilities or were you really just offering legal
20 advice to the campaign?

21 A No, I was investigating.

22 Q Who else on the team was also investigating?

23 A I'm a little bit nervous that this is getting into attorney-client privilege
24 because to what extent am I required to disclose what the legal team was doing.

25 Q Okay.

1 Mr. Sibley. Christina, I don't think it's a problem to identify members of the
2 team, particularly those that are on the privilege log already as being disclosed, because
3 there may be communications with them that we have privilege. So their identities are
4 already out there.

5 Ms. Bobb. Okay.

6 Mr. Sibley. I think you can identify, you know, members of the legal team and
7 members of, you know, anyone that was employed as an investigator or consulting expert
8 or something like that.

9 Ms. Bobb. Years ago, I would say I primarily did a lot of the investigating. Boris
10 and Jenna both did work. They also were primarily, you know, media focused. They
11 were very upfront doing television and interviews. Katherine Friess was part of
12 the -- she was part of the team. She did some work that I'm sure you guys are aware of.
13 I'm trying to think if there's anybody. Feel free to help me.

14 BY [REDACTED]

15 Q Yeah, of course. What about Bernie Kerik?

16 A Oh, yeah, of course. Yeah.

17 Q What was his role?

18 A I mean, he was investigating. We were all investigating, right? Like it all
19 happened really fast. It wasn't like we created an org chart, you know. We just all kind
20 of chipped in how we could and were looking for information but, yeah, Bernie Kerik, you
21 know.

22 Phil Waldron. Sorry. I was trying to think of the lawyers but, yeah, there were
23 a handful of experts too. Phil Waldron was the primary expert I think that we relied on.

24 Q And I'll just stop you there. With respect to Mr. Waldron specifically, was
25 he engaged as an expert by the campaign, so far as you know?

1 A As far as I know. I don't know like what type of agreements they had or
2 whatever, but from an operational perspective, yeah, he was an expert.

3 Q And his focus I understand was on voting machines and analysis, forensic
4 analysis; is that accurate?

5 A A lot of that, but that wasn't how we used him. I mean, he did do that but
6 he, you know, he worked for a lot of different like groups that were looking into this.
7 We were primarily using him for numbers and data analysis, like the New York Times
8 Edison data when numbers came out on election night and, you know, the analysis of the
9 actual results.

10 We were not particularly focused on machines or the actual mechanics of the
11 election. We were looking pretty strictly at the numbers.

12 Q Okay. Is it your understanding that to the extent that Mr. Waldron did that
13 work related to machines, he was doing that with Sidney Powell?

14 A Definite -- I mean, yes. I wasn't particular -- I mean, I kind of glossed past
15 that a little bit, but I wasn't very deeply involved in what they were doing but, yeah, I
16 would say Sidney I think he's done -- I think. This is my understanding, I don't know, but
17 I think he may have done some work for Mike Lendell or possibly Patrick Byrne. I don't
18 know, but --

19 Q So on those names you just mentioned, Ms. Powell, Mr. Lendell, Mr. Byrne,
20 were they on the Rudy legal team, to your knowledge?

21 A No. The only reason I hesitate is because I think initially there was some
22 discussion that Sidney may have or may have not been part of it. I don't actually know,
23 but the others were not.

24 Q Okay. And I know there's a release I believe on November 22nd specifically
25 about Ms. Powell. I think Mr. Giuliani said something to the effect of she's working on

1 her own. She's not part of this team.

2 A Yeah, I think -- sorry. I didn't mean to interrupt you.

3 Q No. I was just going to say, so is it your understanding that at least by that
4 point Ms. Powell was not a part of the Rudy Giuliani legal team for the campaign?

5 A So initially I think it was a gray area. And then he made it very clear at one
6 point.

7 Q What about Joe DiGenova and Victoria Toensing?

8 A Yes. I'm sorry. They were working with Rudy as well.

9 Q As part of the legal team?

10 A Yes.

11 Q And like I said, some of these names we'll get back to, but just to go through
12 the list while we are doing it, what about Cleta Mitchell?

13 A I didn't work her. I don't think I had any communication with her but, yes,
14 I've heard her name, you know, in the environment.

15 Q What did you understand her role to be?

16 A She was working Georgia. Like I said, I didn't really work Georgia initially.
17 So I don't know that, but I -- I think she had something to do with Georgia.

18 Q And what about Ken -- I am going to mispronounce his name, Chesebro,
19 Chessbro?

20 A Yeah. I mean, I think he's doing cases now. I had no communication with
21 him whatsoever at the time, and I have no knowledge of his involvement, at least not -- I
22 mean, I know he's done stuff recently, but at the time frame you are talking about, I
23 wasn't even aware of his name.

24 Q What about John Eastman, what was his role?

25 A He -- I mean, yeah, he provided counsel.

1 Q When do you remember -- was he already part of the team when you got
2 there in November 15-ish?

3 A I don't think so. I think he came after.

4 Q Roughly when? We'll go through some documents that might help this, but
5 roughly when do you remember him coming onto the scene?

6 A I'm sorry. Can you repeat that?

7 Q Yeah, of course. I said we are going to go over some documents that may
8 help on this later, but at this point roughly when do you remember Mr. Eastman coming
9 onto the scene and joining the Giuliani team?

10 A Maybe Decemberish. I don't have a good recollection. I'm trying to
11 answer your questions to the best of my recollection.

12 Q Okay. Very helpful. And I'll use as a guidepost the Electoral College
13 certification date, December 14.

14 Do you think he was there, meaning Mr. Eastman was part of the team before
15 that? Or did you think Mr. Eastman came on after that?

16 A So when I think of Eastman, I think when he was physically in DC. He may
17 have been communicating with the team that I'm not aware of before he was physically
18 in Washington, D.C. So I don't -- to that extent, I don't know. But from my experience
19 and like interaction with him, I think it was either right around that time or shortly after,
20 but I didn't really communicate with him until he was physically in Washington.

21 Q Okay. And I understand he came to Washington, and I think we'll see this,
22 but either very late December or early January?

23 A Yeah.

24 Q Does that line up?

25 A Yeah.

1 Q Okay. So just functionally, what was the process like in the campaign for
2 receiving allegations about election fraud irregularities?

3 A So I -- I mean, I didn't work the campaign, right. I was just campaign legal.
4 And I would receive the information from the operations team.

5 Q Who was the operations team as you understood it?

6 A I'm trying to think of who I got the affidavit from, probably Mike Roman, I
7 don't know. See, I was new. I didn't actually work the campaign, so I didn't know all of
8 the people. And so I would either ask Boris or Jenna or somebody like how do I get this
9 information.

10 So I was very new. I didn't know anybody there. And so I have very limited
11 information about that, but I remember -- I remember interacting a little bit with Mike
12 Roman at that point, but...

13 Q And so tell us about that. How would he get you information and what
14 kind of information would he get you?

15 A Is this not attorney work product? I don't like -- I mean, this was my
16 research and investigation as a lawyer?

17 Q Okay. But just the process generally, without getting into your
18 mental -- your thoughts, any conclusions you made, anything like that, just the process of
19 getting information?

20 A Like how did I get --

21 Q Let me ask I guess a slightly different question. Was there an intake
22 mechanism? I mean if somebody called from Nebraska and said I want to report that I
23 saw X, Y, Z happen at the polling place, how does that information make it all the way up
24 to you?

25 A That's a great question. And I would love for you to ask the leaders at the

1 RNC to explain that, because I don't think there's actually a good process for that. So I
2 don't know, but --

3 Q Okay.

4 A That's actually a really great question that I would love to know the answer
5 to.

6 Q So I guess the stuff that you were looking at, without necessarily getting in
7 again to your conclusions or thoughts about it, but was it handed to you by somebody
8 saying here's your portfolio; go look at this stuff?

9 A Yes. Something like that. It would have been -- like the only thing I can
10 think of is like affidavits, like for cases or whatever. I probably got like a Google drive or
11 something like that, but that was it. I mean, I didn't have a lot to work with, just being
12 frank, and had to go do a lot of it myself.

13 Q Okay. And to do it yourself, I mean, would you go out and talk to people, I
14 mean, do interviews?

15 A Some extent. I mean, I don't want to get too much into my work product
16 of like what I did and how I did it but -- but, yes, I did a lot of the legwork, a lot of the
17 legwork myself. I think a lot of that is in domain public.

18 You know, a lot of it has come from the Arizona Senate, you know. Everything
19 that you can see from my interactions with them, that's all been produced but --

20 Q Okay.

21 A Yeah. I mean, I did it myself.

22 Q And, I mean, obviously there's a lot of litigation out there at the time.
23 Affidavits are filed with litigation. The campaign has to get those affidavits somehow.
24 So did you have a role in getting the affidavits that you just mentioned?

25 A No.

1 Q Who did that?

2 A I don't know. I wasn't part of the campaign. But like if I needed an
3 affidavit, like, because I wasn't local counsel, and I never actually physically needed to use
4 the affidavits myself, so it was never an issue. But if I needed an affidavit for something,
5 I probably would have contacted Mike Herman.

6 Q Okay. And I'm a little bit loose in my language here, and I apologize.
7 When I say campaign, I think of kind of what's left over at that period, understanding that
8 the election had already been run. So you have got the campaign Matt Morgan, Justin
9 Clark, the whole team that they had set up and continued through, along with the legal
10 team that Mr. Giuliani's running.

11 So to the extent there's a difference, can you explain that difference to me just so
12 I'm not using it too casually in my language?

13 A Right. I mean, it was just a difference of, you know, will to investigate.
14 That's it. I mean, it was all the same. We are all on the same team. It was just who
15 wanted to do the work and who didn't want to do it.

16 Q Okay. And who were the people that you thought didn't want to do the
17 work?

18 A I don't know them. Everybody that I was working with was there to work.
19 So Boris, Jenna, Bernie, Rudy, like we were all doing the work. And like they would talk
20 to the people. I don't know who they are, I wasn't part of it beforehand, so, I mean, I
21 don't know who they are.

22 Q Okay. So did you have any interactions, without getting into what they
23 were necessarily, but did you have interactions with Justin Clark?

24 A No.

25 Q You don't remember any?

1 A None. I personally -- I don't -- to my knowledge sitting here today, I don't
2 think I've ever had any interaction with Justin Clark.

3 Q What about Matt Morgan, did you ever interact with him?

4 A Very briefly, like for the purpose of the NDA, but it was all administrative,
5 nothing actually like substantive on the work.

6 Q How about Alex Cannon?

7 A At that time, no.

8 Q You say at that time. Have you interacted with him since January 20, 2021?

9 A Yes.

10 Q Unrelated to the events we are talking about today, January 6 and the lead
11 up?

12 A Yes. Correct.

13 Q Okay. What about they had a research team that they used, meaning the
14 campaign, Zach Parkinson; there's others who looked into some of the claims of fraud.

15 Did you ever work with Mr. Parkinson or anybody on the research team?

16 A Never heard of him.

17 Q How about Tim Murtaugh and Jason Miller, did you work with them?

18 A I mean, of course I've heard of them. Yeah. Jason Miller did the media, a
19 lot of the media stuff around information that we would collect. He would distribute it,
20 but yeah.

21 Q Do you remember Jason Miller ever coming to different conclusions than
22 what you and your team were coming to?

23 A I don't know. I don't have it, like, I personally don't have a specific
24 recollection of giving him information that he like somehow said something else, but that
25 also wasn't my role. You know, I was more of like doing the ground work. And the

1 com people and the messaging people, that was Boris and Jenna and Rudy. That would
2 have been their thing.

3 Q I asked you about affidavits and collecting affidavits for purposes of litigation
4 or otherwise. It sounds like that wasn't part of your ordinary job, correct?

5 A Correct. No.

6 Q Okay.

7 A In Washington, D.C., there was -- no one in DC was going to help me get an
8 affidavit, so it had to be people that were like out in actual locations.

9 Q Okay. So if you could just tell us though then, like what were you doing?
10 On a day to day, you go into the office; are you crunching numbers? Are you analyzing
11 graphs? Are you interviewing people to test kind of the veracity of what's coming in?

12 A Yeah. All of that.

13 Q And did you work with anybody in particular to help you in your job, other
14 than people who were working other states or different issues?

15 A I mean, not -- not -- the way you asked the question, I'm not sure. No, I
16 don't think so. You know, if you asked me how I worked with someone specifically, I
17 might remember, but no. I felt like it -- it was me doing my stuff. And I worked with
18 Rudy and the rest of the legal team, and that was it.

19 A Okay. There are a lot of different allegations of fraud and irregularities
20 swirling at the time, some of which are still out there. I am just going to name one:
21 Dead people voting, suitcases of ballots in Georgia, you know, confined folks who were
22 voting and maybe not meeting the definition of confined. Did you find --

23 A (Inaudible) -- voters, ballot stuff, yeah, as well. There's a lot of evidence of
24 fraud out there.

25 Q So, I guess my question is did you have any one of those in particular that

1 you became the expert on for the team?

2 A We didn't focus it that way. We focused on states. So, yeah, I looked into
3 whether there were dead people voting in Arizona, double voters, you know, vote buying,
4 ballot harvesting, all of that for like Arizona, Michigan, a little bit of New Mexico, a little
5 bit of Nevada. I mean, yeah, I looked into all of it and found evidence of most of it.

6 Q And in Michigan what were the issues there that you recall working on?

7 A The biggest thing in Michigan that I was working on was Republicans being
8 excluded from the process and not having a chance to meaningfully participate in the
9 process, and having ballots counted outside of the view of conservatives, and Republicans
10 being forcibly removed, and having questions because ballots coming from Republican
11 districts were set aside and counted later but never counted, and were they discarded.

12 There was a lot of questions about the integrity of the account, the actual
13 counting. You know, the Wade County clerk wouldn't certify the candidates because
14 the books never balanced. You know, it's that procedural issues. There was a lot of -- I
15 don't want to call it -- there were lots of indicators of -- I don't want to call it fraud,
16 cheating, or shenanigans or problems with the way that the Michigan election was
17 conducted and -- yeah.

18 Q Okay. And you've mentioned indicators, and specifically one of things you
19 said was about observations. Are you talking about the allegations related to the TCF
20 Center?

21 A That's part of it.

22 Q Or are you talking about more than that?

23 A Well, I mean, it's not just the TCF Center. Of course Detroit was the hub,
24 but you have problems in Oakland County and Macomb County. There were problems
25 in several counties. Antrim County was another one.

1 So there were problems in a lot of places but, yeah, the TCF Center was the one
2 that, you know, had all the cameras and stuff with it, so...

3 Q Did you travel to Michigan as a part of that?

4 A No.

5 Q I'm sorry. I didn't hear you, Ms. Bobb.

6 A No, I did not.

7 Q Did you travel -- you mentioned Arizona earlier. Did you go to Arizona?

8 A No. Not that time. [REDACTED]

9 [REDACTED]

10 Q I see. Okay. I'm sorry to hear that.

11 A That's okay.

12 Q Okay. So as you made conclusions, again without necessarily getting into
13 what the conclusions were, who would you pass them to? What was the next step in
14 the process?

15 [Court reporter clarification.]

16 Ms. Bobb. Rudy.

17 [REDACTED] Thank you. I'll try to do a better job on my end as well.

18 BY [REDACTED]

19 Q And what was your understanding of what Rudy did with the information
20 that you passed to him?

21 A I mean, it depends on what it was. You know, like if there was
22 indicator -- it depends. I mean, it depends on what it was. I could tell them
23 information about what people were saying and hearing, and we would determine
24 whether we needed to file a lawsuit, whether there was some other -- you know. We
25 would do a legal analysis, like what do you do with this information.

1 Q Okay. Did you ever have any leads or tips where you were unable to find
2 supporting evidence?

3 A Yeah. Yeah.

4 Q And what happened in those cases?

5 A I usually dropped it. Like why would I pursue something that I don't think
6 happened?

7 Q And other than you, did you engage with any other fact checkers, you know,
8 people whose job it was to sit and really dive into these issues?

9 A Yeah. I mean, not -- yes. I mean, not -- I wouldn't say from like the RNC
10 or the campaign. I mean, that was primarily what I was doing, but yeah. I would talk
11 to, you know, local GOP reps or grassroots efforts or local representatives. Yeah. I
12 talked to a lot of people trying to get information.

13 Q You mentioned grassroots. Were any there grassroots groups or
14 organizations in particular that you worked with?

15 A At the time, at the time I -- I mean, I can't give you like a specific name
16 that -- no. But since then like, you know, there's a lot of effort. In my capacity as a
17 journalist, there were a lot of grassroots efforts that came about like mid 2021 that I
18 worked with for reporting, but not at the time frame you are looking at.

19 Q Okay. Yeah. And just to be clear for you, Ms. Bobb, we are not interested
20 in the reporting aspects of what you did then or what you are doing now or in between.

21 A Okay.

22 Q But I appreciate you making that distinction for us. You mentioned not
23 using the fact checkers or not relying on fact checkers from the existing campaign
24 framework or from the RNC. Was that a deliberate decision not to use them?

25 A -- there even are fact checkers. Like, who are these fact checkers? I don't

1 know who they are. And I'm not trying to be snarky, but like do you have someone in
2 mind that you think did that job?

3 Q Yeah. One of the people I mentioned earlier, Mr. Parkinson?

4 A Oh, yeah. I don't know him. And, actually, you are the first person to tell
5 me that he existed as a fact checker. So maybe that would have been helpful. I don't
6 know.

7 Q Do you remember any discussions about using existing campaign staff or the
8 RNC as fact checkers for any of the allegations coming in?

9 A Do I remember -- no. But it was after the election, so the campaign staff
10 was, like, gone. The only people that were left were people who wanted to volunteer
11 their time to do it because the campaign was over.

12 So to the extent the campaign had fact checkers, I don't know that they existed
13 after November 3.

14 Q Okay.

15 A So I don't know. They may have. They may have not. But from what I
16 saw, it looked like the campaign pretty much dissolved on November 4th.

17 Q We'll get to more of this later, but in your role, other than what we have
18 been talking about already, did you engage in outreach to state legislators?

19 A Yes.

20 Q How about members of Congress?

21 A I don't know, actually.

22 Q And when I say members of Congress, I should also say their staff, so..?

23 A Possibly. I don't have a specific recollection of anybody that I reached out
24 to, but I could have.

25 [REDACTED] I'll pause there to see if anybody has any questions about what we

1 have just gone over.

2 [REDACTED] Nothing for me.

3 [REDACTED] We have just covered a lot, so bear with me just a moment, Ms.

4 Bobb.

5 Ms. Bobb. Sure.

1

2

BY [REDACTED].

3 Q Do you know why Mr. Trump, candidate Trump wanted Mr. Giuliani to take
4 over the legal effort as opposed to continuing to use Mr. Clark or Mr. Morgan or anybody
5 else that was already affiliated with the campaign?

6 A I have no idea.

7 Q And just to go back to some of the names on the team, my understanding, it
8 may not be accurate, which is why I'm asking you, but my understanding is that Mr. Kerik,
9 Bernie Kerik has sometimes been described as kind a lead investigator for the
10 post-election legal team efforts?

11 Would you agree with that characterization?

12 A I think that's fair. I mean, Rudy and Bernie, they are -- like they rebuilt New
13 York together after 9-11. So they are very close. So, yeah, I mean, they were a pretty
14 tight team.

15 Q And earlier you mentioned that after you made a conclusion about whether
16 something had merit, didn't have merit, needed further investigation, whatever it was,
17 you might report that to Mr. Giuliani. Would you also report things to Mr. Kerik?

18 A I mean, I wouldn't say that I reported it as in like I owed -- like from a
19 subordinate to a superior, although I certainly respect and have a lot of admiration for
20 Bernie Kerik and his career, but it wasn't really that type of environment. It was
21 more -- I mean, I would give information to anybody who wanted it, you know. Like I
22 wasn't -- I wasn't trying to withhold anything or be secretive about anything, so --

23 Q You said Mr. Kerik and Mr. Giuliani were a close team. Do you have any
24 reason to believe that Mr. Kerik wasn't aware of what you were doing, the conclusions
25 you were making?

1 A I mean, it's quite possible. We -- we didn't -- especially remember [REDACTED]
2 [REDACTED] So I wasn't sending him an email every day telling him what I
3 was doing. So, yeah, it's quite possible he didn't know what I was doing. But I think
4 anything big, like talking to a state legislator who was interested in hearing the
5 information, he would certainly know about that because there was a hearing that was
6 held. But, no, I think it's very likely that he did not know everything I was doing.

7 Q And another name I neglected to mention was Russ Ramsland. Do you
8 know who that is?

9 A Yeah. I know who he is.

10 Q Was he part of the team, the legal team officially?

11 A I don't know. I don't know. At the time I saw him as like Phil's partner, or
12 like Phil and Russ were doing stuff together. I think they were working on Antrim stuff, I
13 think.

14 So I don't know the official relationship but, yeah, it's possible that he had a
15 formal relationship with the campaign.

16 Q You don't know for sure though?

17 A No, I don't know.

18 Q Just to be clear. Sounds like you didn't, but did you have any formal or
19 informal role working for the campaign before the election?

20 A No.

21 Q And when you joined the post-election efforts, do you know if the
22 campaign -- or excuse me, the legal team had reached any conclusions about the
23 possibility -- or excuse me, the existence of fraud sufficient to change the outcome?
24 Again this is the beginning when you joined.

25 A Yeah. I mean, I don't know what you mean by reached conclusions but,

1 yeah, we certainly all suspected it. I thought there was plenty of indicators,
2 circumstantial evidence, reasons to believe that the election was not conducted properly.
3 And I think we all believed that, which is why we were willing to volunteer our time to
4 investigate.

5 Q That's exactly what I'm getting at. And I think your answer anticipated
6 some of what my next question is going to be, is you are a lawyer, understand the
7 different kinds of burdens of proof, so to speak, you know, civil burdens of proof,
8 preponderance, reasonable suspicion in a criminal context.

9 Where were things, I mean, at that point when you joined, was it just allegations
10 that you had and were investigating or were there actual conclusions this happened?

11 A Well, I -- so, you know, there's different types of evidence, right. You have
12 direct evidence. You have circumstantial evidence. You have physical evidence. And
13 I think at the time I would say the circumstantial evidence was -- the way the election was
14 conducted was suspicious.

15 The fact that Trump had such a blowout that on the day of election and into the
16 election night, and then suddenly, you know, five or six states stopped counting. And
17 suddenly then they all -- it was weird. And everyone says, oh, it was COVID. It was
18 COVID. Okay. Maybe it was COVID, but it was very weird. It was very suspicious.

19 So that's circumstantial evidence that something was amiss, right. It's not -- you
20 know, maybe probably not beyond a reasonable doubt, but there's something there. I
21 would say that that is evidence.

22 I think there's evidence of the fact that Republicans from the time the polls
23 opened were complaining that they didn't have the same access as Democrats did. Like
24 there were complaints about that the morning of November 3.

25 So that's evidence that there's, you know, something wrong happening, or that

1 there's -- again I don't want to use the word fraud, because then you are going to tell me
2 that, you know, define it and all that stuff and, like, I don't want to use a legal term. But
3 there's indicators of bad activity.

4 And I think that happened in multiple states throughout election day into election
5 night, the fact that they stopped. I think there's plenty of evidence on election day to
6 say, hey, there could be a problem here. It's worth investigating. And I think that's
7 where we were at.

8 Q Okay. So you mentioned like indicators and problems that could be worth
9 investigating. That's where things were at though. Like there's a need for follow up as
10 opposed to rock-solid conclusions, at least at the point when you joined in mid
11 November?

12 Nobody has said this absolutely happened yet. These are allegations that we
13 need to look into; is that fair?

14 A I mean, I think it's fair. I -- I -- because I know at the time everyone was
15 saying, oh, there's fraud; there's fraud; there's fraud. And I don't want to say that there
16 wasn't fraud. That's not the point that I'm trying to make. The point I'm trying to
17 make was there was plenty of evidence to be concerned about fraud.

18 Q Okay.

19 A Now, we didn't have a case put together on November 4th, because it was
20 November 4th. So was there fraud on November 4th. Possibly. That's why I
21 volunteered and I wanted to look into it because I was concerned about the integrity of
22 my vote, of the country. I think that's why we all got involved.

23 So I don't want you to take my statement and say Christina Bobb said that in the
24 beginning the legal team knew there was no fraud. That's not what I'm saying. I'm
25 saying there was plenty of reason to believe there could be fraud. And to the extent

1 that people were saying there was fraud, you know, I would probably stand by their
2 statement.

3 If you want me to prove it in a court of law, that's a different standard, right. So
4 I -- you know, I don't know. It's not as black and white. I'm not trying to be rude. It's
5 not as black and white as the question, and so I can't say.

6 Q Yeah. No. And I am not going to put any words into your mouth, Ms.
7 Bobb.

8 A Right. If you don't, the Washington Post will or Daily Beast or somebody
9 will. So I just want to make it very clear. Forgive me for being a little informal, trying
10 to play a little bit, but, you know, I just want to make sure that my words are not used to
11 say, oh, President Trump had no basis to say there was fraud. That's not my point at all.

12 Q No, I understand. And I totally get it. I mean, you have an investigation.
13 You start with at one point the reason you investigate is to look into things, right?

14 A Correct.

15 Q That's the reason for it. So I'm just trying to understand where in that
16 spectrum of investigation to conclusion things were at least so far as you knew when you
17 started. It sounds like they were in the we-need-to-investigate phase but, again, I don't
18 want to put words into your mouth.

19 A Yeah. I mean, I think it depends on -- you know, it was -- it was triage,
20 right. It was the day after an election. You have less than two months to kind of solve
21 of your case. It's not like you have the typical two years of litigation to put your case
22 together and make it all nice and neat. So it was not nice and neat. And I don't think
23 anybody would say that it was.

24 Now, if you are asking me was there conclusive proof of Republicans being
25 excluded from the process, yeah, I think there was. On November 4th -- on November

1 3rd, I think there was conclusive proof that Republicans were excluded from the process
2 in some states in some areas.

3 Can I say there is conclusive proof of -- like I don't know the numbers very well?
4 I'm not a numbers person, so that's not my area. So personally you are asking me, I
5 don't know. But there were certain things that I think were provable. There were
6 certain things that I think were probably not provable at that point. And then there
7 were things that were open questions. So I don't know.

8 Q Okay. No, that's helpful. I appreciate that. Part of this, and part of
9 what happened after the election, or there were press conferences, you know. Mr.
10 Giuliani went out, gave press conferences. Other members of the legal team gave press
11 conferences.

12 What was your understanding of the need to do press conferences about this, the
13 reason behind it?

14 A I don't know. I never did one. You'd have to ask them.

15 Q We talked a little bit about how allegations of fraud irregularities, whatever
16 it is that you want to call them came in; but once they come in, was there a central place
17 for tracking? Did you guys have like a database of information where this stuff was
18 stored?

19 A You would have to ask the RNC or the campaign. I don't know. I had
20 nothing to do with that.

21 Q But not to your knowledge there wasn't a central place where you logged in
22 to look at all the --

23 A No.

24 Q -- the data that you had, for example?

25 A No. And it's possible it existed and I didn't have access to it. You know, I

1 was a newbie. Like I wasn't part of the original team. So I can't say it didn't exist. I
2 didn't know about it.

3 Q And if you know, what steps needed to be taken just from a process
4 perspective before a claim about the election or something that had happened in the
5 election appeared in a public statement or in a court filing?

6 A I have no idea. I mean, I was the media at that point and I, you know, I
7 don't know, so...

8 Q When we talked about this kind of continuum of proof and standards of
9 proof, was there any certain level that a claim had to reach before the team felt it could
10 be used in a court filing or affidavit?

11 A Well, sure. I mean, we all -- we are lawyers. We have ethical standards,
12 right. You are not going to put junk up into a court. So whether it was an affidavit, you
13 know, someone swearing that this is what they witnessed or what they saw, I mean, it's
14 the proof of, you know, any trial lawyer.

15 Q Okay. So if a witness came with an affidavit and said I saw this, for
16 example, happen at the TCF Center in Detroit; was there any requirement that you are
17 aware of to verify the information in that affidavit, or was the fact of the affidavit
18 sufficient for the team?

19 A We would verify that the person was actually there, you know, it wasn't
20 some rando on the street, that they were actually either registered with the GOP as an
21 observer or, yeah, you would verify that the person is who they say that they are. You
22 get all that information.

23 I do think either the RNC or the Trump campaign had someone doing that. Like I
24 said, I didn't gather the affidavits, so I don't know, but I do think that that process took
25 place. But certainly you are not just going to take an affidavit from anybody and assume

1 it's legitimate.

2 Q Were you counsel to any lawsuits that were filed after the election?

3 A Definitely not counsel of record. No.

4 Q I should have said of record. I'm sorry. That's what I meant, not counsel
5 of record to any lawsuits?

6 A No.

7 Q In your role, though, did you assist in the litigation? And I don't want to get
8 into work product, but did you participate in the lawsuits that were happening in
9 Michigan or Arizona, some of the states you mentioned earlier?

10 A Probably. I -- to be honest, I was focusing more on the state legislators, but
11 probably, yeah. Or I would help with, you know, the information that I had or
12 something like that but, you know, I don't have a specific recollection of that, but
13 probably yes.

14 Q Now, as that litigation proceeded, I think none of it, maybe one case was
15 successful, 60 out of 61 challenges, not all of which came from the Trump campaign or
16 the legal team. How did that affect what you were working on, and how did it affect the
17 messaging coming out of the legal team with respect to those claims of fraud, if they had
18 been litigated?

19 A I had nothing to do with the messaging. You would have to talk to Rudy or
20 Jenna or somebody that did the messaging. And I certainly -- I don't know, you are
21 saying 61 cases; there certainly were not 61 Trump cases. There were other parties or
22 whatever, and I have no control or anything over what other parties do.

23 So, to that extent, it doesn't affect anything. I mean, I don't know that it had an
24 effect on me personally.

25 Q What about like, I mean, you mentioned the TCF Center and what was

1 happening in Detroit. There was a case from I believe mid November in Detroit. It was
2 Chief Judge Kenny who decided to call Constantino versus Detroit.

3 Are you familiar with that case?

4 A I am not.

5 Q Okay. In that, there are multiple affidavits submitted, but it talked about
6 fraud at the TCF Center, about observing -- excuse me, and Mellissa Carone was one of
7 the affiants who submitted an affidavit for that. The judge in that case, I'll represent to
8 you, he looked at some of that and analyzed the affidavits that were submitted, and
9 ultimately determined that the plaintiff's affidavits did not have sufficient merit to
10 warrant any kind of relief.

11 So I almost -- Ms. Carone was ultimately a witness in several meetings with state
12 legislatures. So I guess my question after all of that is how did that case where a judge is
13 saying, you know, I don't find sufficient merit, sufficient evidence to warrant relief on
14 some of these issues weigh in to any decisions that you or the team made on those issues
15 or with respect to witnesses like Ms. Carone?

16 A For me personally, it had no effect on me. Like I wasn't even aware of the
17 case until you just told me about it. So if it impacted anybody else, you'll have to ask
18 them.

19 Q Was there a person who was tracking all of the litigation that you are
20 familiar with on Mr. Giuliani's --

21 A -- were at the Trump campaign or something like that. That was not my
22 role.

23 Q Do you mind starting over, just because I think there was a little bit of over
24 talk there.

25 A I said probably at the RNC or maybe at the Trump campaign, but it was not

1 my role, so I don't know.

2 Q And do you know anybody on Mr. Giuliani's team who had that role?

3 A No. I mean, I don't know. I mean, it was like four -- right after the
4 election, you know what I mean. We had eight weeks to work together. So, no, we
5 weren't doing anything specific like that where they would -- I don't think. But a lot of
6 the election tracking -- I mean, if you are only going to track a lawsuit for eight weeks, you
7 are going to get the complaint, you know. Like what else happened after that.

8 So, no, we -- we did not have enough time to need something like that. And
9 again, this is all to my knowledge. There could have been somebody doing it that I am
10 not aware of.

11 Q Absolutely. Fair point, Ms. Bobb.

12 So it's been reported that some of the lawsuits that Mr. Giuliani was responsible
13 for filing were partially based on getting of course favorable court rulings, but also based
14 on convincing the media and the public about some of these alleged improprieties, fraud,
15 whatever you want to call them.

16 Were you aware of the media strategy that Mr. Giuliani or his team or others on
17 the team employed?

18 A No. I had nothing to do with the media aspect of it.

19 Q Was that intentional because of your co-existing role or background role
20 with OAN?

21 A Probably. I mean, nothing formal, but I was trying to be respectful of the
22 access that I had. And also I was not invited to be on the media team. So, you know,
23 I'm not going to force myself into that. I was there for a purpose, and it wasn't for
24 media, so...

25 Q You mentioned having a perhaps larger role, again I don't want to put words

1 in your mouth, but at least a role with respect to state legislatures and --

2 A Yeah.

3 Q -- the aftermath of the election. Was that something that -- was that part
4 of your role when you started November 15th, or is that something that added later on?

5 A That -- I mean, added later on, probably like three days later, you know. It
6 wasn't like -- everything happened so fast. But did I contact the state legislature on my
7 first day, probably not.

8 Q So what was your role? What was the job that you had with respect to
9 state legislatures? How would you describe it?

10 A We were assigned a duty. I was just trying to figure it out. So I just picked
11 up the phone and started calling them, asking them what they thought happened in their
12 state, what they wanted to be -- like what information do you need. You know, I don't
13 want to get into too much because it's my work product, but I just picked up the phone.
14 I wasn't assigned, you know. I just picked up the phone and started calling.

15 Q What was the end game, so to speak, with respect to state legislatures?

16 A There is no end game. I mean, the point is making sure that our elections
17 are safe and secure to the extent that state legislatures are responsible for that,
18 according to the Constitution. What is it that they want?

19 I think a lot of the discussion is still happening, whether it's writing new
20 legislation, whether it's considering -- you know, Wisconsin is still doing their
21 investigation. They had one report come out, I want to say less than two months ago, a
22 month ago, and like they are still investigating. So I don't think there's an end game.

23 I think the whole purpose is to make sure that everybody gets one vote per
24 person, that you don't have people dumping, you know, 25 ballots in and committing
25 fraud.

1 Q And when you started, was it your understanding that state legislatures had
2 a role in correcting, changing, affecting the outcome as certified by other parts of state
3 government?

4 A I'm sorry. I don't understand the question.

5 Q Okay. Fair enough. Thank you for asking for clarification.

6 I use the word "end game" or the phrase end game, and maybe that's not the
7 right phrase to use, but -- but did you think that state legislatures could do something to
8 affect the outcome of the election, or was it just a matter of informing them about what
9 was happening?

10 A I don't know. I think -- according to the U.S. Constitution, state legislatures
11 are responsible for their elections and for their electors. And I do think state legislators
12 have authority over their elections. I do think there are things that they could do.

13 It's up to them certainly what they want to do but, yes, I believe in the United
14 States Constitution. It vests the authority with state legislatures.

15 Q Was that your understanding when you joined the legal team around
16 November 15th, or is that something that you had to be kind of read into or that you
17 learned after joining?

18 A I mean, I think it's Article 2, Section 1, Clause 2, I think, or it's something like
19 that for the electors clause. And, like, I read it. And you read that and it's like I don't
20 need to be read into the U.S. Constitution. I can read it in black and white and make my
21 own decision on it. And when I read it, it says power to select electors. That's the
22 state legislatures. And so I think it vests the state legislatures.

23 Q Okay. Sure. But I guess one, what we'll see as we walk through some of
24 the documents that you provided and otherwise, we see requests ultimately as we
25 approach January 6 that state legislatures do something, either appoint their own set of

1 electors, or delay, seek a delay in certification so they can continue to look into it.

2 Was that your understanding at the beginning in November when you joined, that
3 there may be that aspect, that state legislatures appoint their own electors, for example?

4 A I don't think anybody -- you are saying appoint their own electors. I don't
5 think that was ever a thing. I mean, I know that there's the whole alternative slate of
6 electors that came up, just like the replica of I guess 1960 or whatever, like they were
7 trying to do the same thing, but I don't -- the request was that the state legislators take a
8 closer look at their election and make a decision.

9 And it's always been up to the state legislators what they want to do with that. I
10 don't think there was -- like, I mean, I guess I don't know. I guess the answer to -- short
11 answer to your question is I don't know.

12 There was no -- I didn't come in going, hey, you know what, I'm going to tell the
13 state legislators that they need to reverse the election. No. I didn't join the legal team
14 thinking that but, I mean, is it possible that the state legislators have concerns like we see
15 a lot in Wisconsin right now, that maybe the wrong slate of electors was sent or, you
16 know, the election was certified improperly. It's certainly possible. Yeah.

17 Q Okay. And we'll get into more of that later, but that's helpful. I
18 appreciate that, Ms. Bobb.

19 I'll stop there to see if anybody has any questions before we move into the next
20 topic.

21 [REDACTED]: Sure. So, good morning, Ms. Bobb. Earlier we were talking
22 about sort of where in your view the sort of, you know, status of the case was when you
23 joined in mid November. And [REDACTED] and you talked about this spectrum starting
24 with suspicions, you know, and on the other end of the spectrum is sort of building a
25 case, you know, and proving a case that there are concerns of election irregularities.

1 By the end of your time working on Mr. Giuliani's team, where would you say you
2 were on that spectrum in terms of building evidence; and did that vary by state, and did it
3 vary by the types of irregularities you were looking into?

4 Ms. Bobb. So, and I go back to what I said before, it depends on what you are
5 looking at. Like if you are looking at were Republicans excluded from the process, we
6 have I would say pretty conclusive proof that that happened on election night.

7 [REDACTED] Sure.

8 Ms. Bobb. But that's not the entire case, right. So there's a spectrum, but
9 there's like spectrums within spectrums. And so it depends on what you are looking at.

10 Some stuff I think was pretty solid and conclusive. And then other stuff it was
11 very much an open question and we were trying to investigate. And I think we are still
12 there at some point. I'm sure you gentlemen have already concluded that the election
13 was conducted properly. I personally, as I sit here, I don't think that's true. And I have
14 open questions about it. And there are -- there's a lot even more evidence has come
15 out, you know, in the last year.

16 And Wisconsin did a very thorough investigation. I thought the Arizona audit
17 was very thorough. And to me there's more questions now than there was in November
18 2020.

19 So I think it's very much an open question, and I have very serious concerns that
20 there are problems with our election.

21 [REDACTED] Sure. So, I mean, I'm just sort of thinking, you know, at the
22 time you stopped, you know, where you thought that the status of things were, you
23 know, where you stopped working with the Giuliani team. And you mentioned that it
24 was kind of different, different places for different types of issues, you know.

25 By the time you stopped working on the Giuliani team, were there particular

1 issues or areas where you felt like you built a pretty good case?

2 Ms. Bobb. I don't know. I think we have a pretty good case. Where if you are
3 asking me by January 6, 2021, I think we had -- I think we had a lot of evidence. We
4 have a lot more evidence now. And so the difference between what we had at that
5 time, what we have now, I mean, I don't remember exactly where that line is. So I
6 don't -- I mean, I don't know, but I think -- I think there's a lot of evidence that there was
7 bad actors during our election.

8 I think there's a lot of evidence that there were problems and possible fraud,
9 possible cheating, possible ballot dumping, multiple votes from multiple people, ballot
10 harvesting. I think voter manipulation seems to be a really significant problem. So,
11 yeah, there's a lot of evidence that, you know, I don't think -- I don't think it's been
12 resolved.

13 [REDACTED] Understand. Do you have any follow up on that, [REDACTED]?

14 [REDACTED] No.

15 BY [REDACTED]

16 Q All right. So I do want to jump into the issue of Dominion voting machines.

17 When did you first hear about issues related to Dominion voting machines?

18 A Same as everybody else, after the election.

19 Q Was it as a result of your work with the legal team or was it just in public
20 reporting?

21 A Probably public reporting. I mean, Rudy wasn't particularly interested in
22 the machine stuff, from my recollection.

23 Q Do you know why?

24 A I mean, he's a litigator. He wanted stuff that you can submit to court, that
25 a jury can understand. And algorithms and all that stuff, it's very difficult. So he

1 wanted affidavits from real people that were there that could talk about what they had
2 witnessed. And that's what we as Rudy's team focused on.

3 Q But since Dominion and Smartmatic did come up though at a press
4 conference, or at least one press conference, including the press conference that Mr.
5 Giuliani and others did at the RNC in mid November; do you remember that?

6 A Vaguely. I was not there. I wasn't present, you know. I didn't
7 participate.

8 Q And I'm going to show you a document to see if you recognize it. If you
9 could pull up Exhibit 4 please, [REDACTED] I'll represent to you, Ms. Bobb, that this is a
10 document compiled by the campaign and some of the researchers on the campaign. It's
11 titled Dominion Voting Systems, Top Lines. And then it talks about some of the
12 allegations related to Dominion and Smartmatic.

13 And if you can zoom out just a little bit, we can scroll through this, but as you look
14 at it right now and what you see, do you recognize this document? Have you ever seen
15 it before?

16 A I don't recognize it. No.

17 Q Were you aware that the campaign did research -- or leftover campaign
18 personnel, to be more precise, did research into Dominion and Smartmatic when these
19 allegations started surfacing?

20 A Probably. Yeah. I mean, I know Colonel Waldron was interested in the
21 machines and looking at it. It wasn't something that I was particularly focused on but,
22 yeah, like I am aware -- to me, from where I sat, it was kind of like a background thing
23 that I think was happening, but I'm -- I don't recognize the document. I don't know if I
24 received it or not, but I don't think I've read it.

25 Q Without getting into any specifics, do you remember any discussions about

1 the research that the leftover campaign folks were doing into Dominion and Smartmatic
2 to -- yeah, debunking some of those claims that had come out?

3 A I don't know. I'm not -- I don't know.

4 Q Any follow-up on that? No? Around this time, we are still in mid
5 November, there's a lot of talk, at least in the public realm about Dominion voting
6 systems. And Mr. Ramsland, Russ Ramsland who we talked about earlier was on Lou
7 Dobbs and said that he had identified over 3,000 precincts in Michigan where the vote
8 count was between 99 and 350 percent of the number of voters. And then a few days
9 later, it came out that Mr. Ramsland had confused voting precincts in Michigan and
10 Minnesota.

11 Do you remember that happening with respect to Mr. Ramsland and the precincts
12 and turnout?

13 A I don't remember. No.

14 Q Were you aware that Mr. Ramsland withdrew an affidavit at some point
15 related to his research and his conclusions about voter turnout exceeding the number of
16 registered voters?

17 A That vaguely sounds familiar. I think I remember that but I'm not sure.

18 Q Okay. What do you think you remember about it?

19 A Just what you said, because you said it. It kind of sounds familiar but I -- I
20 couldn't add to it.

21 Q Do you remember there being any concern about that, about having to
22 withdraw an affidavit that Mr. Ramsland, who was also doing a lot of work with respect to
23 ASOG and the Dominion voting machines reports?

24 A That, I mean, it didn't impact me. I don't even remember it happening.
25 Like I kind of sort of maybe remember it happening, but no. It had no impact on me.

1 Q Okay. And you mentioned a few times here today that you still have
2 concerns about aspects of the election. Do you have concerns that Dominion in
3 particular engaged in bad behavior with respect to the election, whether it's called fraud,
4 irregularities, or otherwise?

5 A I mean, yeah, I'm still concerned about it. I would like to see evidence and,
6 you know, I would like to have an opportunity to actually investigate. And I don't think a
7 thorough investigation has been done. And to me that's suspicious.

8 Why. Why can't we see? Why can't the voters know that our vote is being
9 counted accurately?

10 Q But as you sit here based on everything that happened, including the ASOG
11 report and everything else about Dominion, is there in your mind I guess conclusive
12 evidence of wrongdoing with respect to Dominion as far as how the votes were counted?

13 A I don't know. I have not investigated Dominion.

14 Q Okay. All right. If we can pull up Exhibit Number 6, please. This is a
15 document that you provided to us, Ms. Bobb.

16 A Okay.

17 Q And if we start on the bottom of page 2, I think that's where the email
18 thread begins. It's an email thread from Mellissa Carone to Patrick Colbeck about
19 somebody named Anthony.

20 First I'll ask you do you know who that Mellissa Carone is that's listed there?

21 A Yeah. I know Mellissa Carone.

22 Q Who is that?

23 A I mean, she's a Michigan resident. She was one of the workers at the TCF
24 Center in Detroit on election day. And I think she's kind of like a whistleblower. I don't
25 know if she has whistleblower status or not, but she was one of the ones saying that

1 there was problems at the TCF Center.

2 Q Is she the person who appeared with Mr. Giuliani in some of the state
3 legislature meetings that occurred?

4 A I think she was a witness. Yeah.

5 Q And how about Patrick Colbeck? Do you know who that is?

6 A I do. He is a --

7 Q Who is that?

8 A He is a former state senator of Michigan who I think he also worked at the
9 TCF Center and witness -- I think he was also a witness from election night.

10 Q And did you work with Mr. Colbeck in your efforts related to the legal team?

11 A I have interviewed him. I cannot remember if at the time, I mean, if I sent
12 you this email, I obviously got something from him. I don't remember specifically at that
13 time what I did with him, but since then, like I've interviewed him as a journalist and
14 reporter. But I don't specifically remember what I did with him at that time.

15 Q In this email it says -- or she says, excuse me, Please Re: Updated affidavit,
16 and then attached three files called updated affidavit, original affidavit, and contact list of
17 Dominion employee for election day. That gets forwarded a few times, including
18 updated affidavit and documents attached, before it ultimately makes its way to you.

19 Do you know if that's something that the campaign -- I'm using that term again to
20 refer to the campaign legal team, is that something they requested from Ms. Carone or is
21 this something she just did on her own?

22 A I have no idea. Where does it get to me? I'm sorry. Can you show me
23 where I get on the chain?

24 Q Yeah, of course. We'll work up to that, but it does make its way first to
25 Connie Hair.

1 Do you know who that is?

2 A No. Sorry. Hang on. No. I don't know who that is.

3 Q Do you remember ever hearing about or working with Louis Gohmert's chief
4 of staff in the work that you or the legal team did after the election?

5 A Vaguely. Can you tell me his or her name?

6 Q Connie Hair.

7 A Oh, that's -- okay. Maybe. Then I kind of sort of remember something
8 about that but, I'm sorry, I don't specifically remember.

9 Q Okay. And other than what you specifically remember, what do you kind of
10 remember about Ms. Hair or working with Mr. --

11 A I remember something about Louis Gohmert's -- Louis Gohmert wanting
12 information about affidavits. I think it was a -- I vaguely remember somebody saying
13 or -- I don't remember how, but like how, you know, Gohmert wants to know how many
14 affidavits we have or something like that, but that's it. I don't remember more.

15 Q And do you remember based on that vague recollection when that was? Was
16 that like November, December, January?

17 A I don't know. Quite honestly, I don't even know that it was before -- you
18 know what, I do remember. It was like April, because I was in Arizona at the time. So
19 it was after -- sorry. It was after all the stuff.

20 During the time from November to January, I don't think I had any communication
21 with legal and stuff, I don't think, but I --

22 Q So then Ms. McLaughlin, Lauren McLaughlin sends this to a few people
23 including Sidney Powell who, going back to your question, Ms. Bobb, sends it to Andrew
24 Giuliani, you, Rudy Giuliani, Jenna Ellis and somebody named Jorns.

25 A Okay.

1 Q Do you know who McLaughlin is, Lauren McLaughlin?

2 A Does she work for Gohmert?

3 Q What's your understanding?

4 A I remember working with some, like, not working with, but I remember
5 getting a question from someone on Gohmert's staff. The name Connie Hair does not
6 ring a bell. Lauren McLaughlin kind of sounds familiar, so I feel like she may have been
7 someone on the staff that was asking, but I don't know.

8 Q And then Sidney Powell sends it to you and others. What do you -- do you
9 recall receiving this?

10 A Not specifically.

11 Q Do you remember doing anything with Ms. Carone's affidavit?

12 A No. I probably would have just saved it with the affidavits but, no, I didn't
13 do anything specific with them.

14 Q On this email that Ms. McLaughlin sends, she also sends it to Don Brown and
15 Lynda McLaughlin who's at Hannity. Do you know who Lynda McLaughlin is?

16 A I've met Lynda. Yeah.

17 Q And do you know if her daughter -- or she has a daughter named Lauren
18 perhaps?

19 A I think it's her sister.

20 Q Sister. Okay.

21 A I don't know, but I think -- I think vaguely, if my memory is coming back, I
22 think Lauren is Lynda's sister.

23 Q And based on the memory that's coming back as we sit here and do this, did
24 Lauren -- you still think that Lauren is somebody who worked with Mr. Gohmert?

25 A I think so.

1 Q Okay. What about Don Brown?

2 A I don't know. I don't know.

3 Q Do you know Don Brown?

4 A Hmm-hmm. No.

5 Q And I recognize all the names on the "To" here, but Jorns at Temple -- or
6 excuse me, Templar Baker, do you know who that is?

7 A No. But it sounds like he works at a law firm.

8 Q If we go to page 4 of this exhibit, still on Exhibit Number 6, do you remember
9 this document? Looks like a checklist, and maybe we can zoom out a little bit to give
10 you more of the context. And based on your production, we understand that this was
11 one of the attachments of the email we have been looking at.

12 A Oh, okay. I don't specifically remember this, but it could be familiar.

13 Q Do you remember doing anything with this document?

14 A No. I don't think so.

15 Q Okay. If we go to page 5, this is also as I understand it, based on your
16 production, an attachment that came with Mellissa Carone's documents.

17 A Okay. What is it?

18 Q I'm going to ask you. Do you recognize the handwriting on it? Is that your
19 handwriting?

20 A That's not my handwriting.

21 Q Do you recognize the document itself other than the handwriting?

22 A No, I don't.

23 Q Okay.

24 A Looks like -- Michigan, Wayne County -- are those just the cities -- I don't
25 even know what it is. Are those just like the precincts within Wayne County?

1 Q I was going to ask you what you understood it to be, so I --
2 A I think, I mean, to my knowledge, I could be wrong, and you probably have
3 an email somewhere of me like explaining what this is, I don't know, but it looks like those
4 are the precincts within Wayne County. To my knowledge, I think this is the first time
5 I'm seeing this document, but it looks like the different precincts in Wayne County and
6 who to the contact for support.

7 Q Let's go to page 6 of this exhibit. This is another -- my understanding
8 another attachment to the email we were looking at in the same exhibit. Do you
9 remember seeing this document before?

10 A I don't remember having a specific recollection of this, but I probably could
11 have. I wouldn't have needed it for anything I was doing, but --

12 A Why is that?

13 A I don't remember doing anything at Dominion.

14 Q One of the things we talked about was a press conference at the RNC that
15 occurred on November 19 with Mr. Giuliani, with Ms. Ellis, Sidney Powell, I think
16 Mr. Epshteyn was there as well.

17 A Yeah.

18 Q You said you were not there. Did you help to prepare anything for that
19 press conference that you recall?

20 A Not specifically. I mean, I was -- at that point I had probably been working
21 with them for less than a week, so no.

22 Q Do you recall any concerns about anything that either was presented either
23 before it was presented or afterwards at that press conference?

24 A I don't have any specific recollection. No.

25 Q Ms. Powell mentioned Dominion, I believe Smartmatic as well during that.

1 And this is shortly before Mr. Giuliani issued the statement that said Ms. Powell is not
2 working with the campaign legal team.

3 Is it your understanding that her comments during this November 19th press
4 conference had anything to do with Mr. Giuliani's statement on the 22nd just a few days
5 later?

6 A Could have. I don't know.

7 Q Don't know for sure though?

8 A I don't know.

9 Q I'll pause there and see if anybody has any follow-up on what we have gone
10 over. Okay. If we can go to Exhibit Number 8, please. This is also a document that
11 you provided to us. Okay.

12 Very brief there, it's from someone named Mark Finchem to Lyle Rapacki?

13 A Yup.

14 Q And you. So, first things first, who is Mark Finchem, the person who sent
15 this email?

16 A Mark Finchem is a state representative in Arizona. You can see in his
17 signature block, Arizona House of Representatives. He is the representative for
18 Legislative District 11, based on his signature block. And he was also the one that
19 chaired the hearing in Arizona.

20 Q And who is Lyle Rapacki?

21 A Lyle Rapacki, I don't know who he, like, his title or anything, but he was kind
22 of like the go-through for Finchem.

23 Q Someone based in Arizona as opposed to Washington?

24 A Yeah. Exactly.

25 Q Do you know if he was on Mr. Finchem's staff?

1 A I don't think he is, but I don't actually know.

2 Q And here he's sending it looks like a list of people, and then the subject line
3 says, Updated witness list. This is on November 29 at 6:08 p.m. The people include
4 Senator Colbeck, Bobby Piton, Marissa Hamilton, Elizabeth Harris, Phil Waldron, Phil
5 Evans and a few others.

6 What did you understand this to be?

7 A At the time, I mean, I don't remember, because it was a year ago. But
8 looking at this today, what I think this probably -- it's a little bit weird because the Arizona
9 hearing was held November 30th. And so this could have been like who he wants to call
10 for his hearing that's going to be held the next day, because he chaired it. And I'm
11 guessing he was sending this to me so I could give it to the mayor, Mayor Giuliani, to say
12 this is who Finchem would like to hear from at the hearing.

13 I don't know if these are the people who actually -- I mean, we would have to go
14 back through the hearing to see who actually testified, but that's what this looks like to
15 me today. What it was, you know, over a year ago, I -- I don't know.

16 Q This suggests there was an earlier version of the witness list. What role did
17 you or anybody on Mr. Giuliani's legal team have, if any, with respect to identifying
18 witnesses for the hearing in Arizona?

19 A So I coordinated with Mark Finchem for the hearing. As far as witnesses
20 go, I don't remember if I gave him witnesses or not. I honestly don't remember.

21 Q Okay.

22 A Some of the ones -- if I would have given him witnesses, it probably would
23 have been like Phil Waldron. The only one on this list that I would have, like, highlighted
24 for Finchem probably would have been Waldron. The other ones I didn't know -- well, I
25 knew Colbeck, but I don't think I would have said Colbeck for Arizona. I don't know why

1 he's on there. I don't know.

2 Q There's a phone number at the top of this screen right now, and that's in an
3 email that you sent to Mr. Giuliani, Ms. Ellis, Mr. Kerik and Katherine Friess. And correct
4 me here, is it "Frees" or "Frice?"

5 A "Frees."

6 Q Friess. Okay. So Katherine Friess. That's the phone number that you
7 used?

8 A That's my cell phone number. Yeah.

9 Q Apart from this block --

10 [crosstalk]

11 A -- signature block. Like when you see that in all the emails, from my reply
12 emails, I just have my cell phone number for my signature block.

13 Q Understood. Thank you. You can take this down, █ Thank you.

14 So tell us a little bit about your interactions with Representative Finchem. When
15 did you first meet or communicate with Mr. Finchem?

16 A I don't remember the first, like, I don't remember the exact day, but it was
17 not long after I joined the team, probably -- let's assume I started November 15, maybe a
18 week later I called him to see if like what his thoughts were on everything that happened
19 in Arizona, and see if he was interested in hearing some of the evidence that we had
20 found in Arizona.

21 Q Is that something you were asked to do or is that something you did on your
22 own initiative?

23 A I did that on my own initiative.

24 Q And why Representative Finchem as opposed to somebody else in Arizona?

25 A He took my call. I mean, I had limited phone numbers. And I was calling

1 people and he answered, and so it was Finchem.

2 Q Do you remember calling other people in Arizona too or trying to call them?

3 A I tried calling Kelly Townsend as well. I guess she had changed her phone
4 number or something because she ended up joining the hearing; but, no, Finchem just
5 happened to be the first person I got a hold of.

6 Q Did you try calling Governor Ducey?

7 A No. I can't remember, actually. If I did try, I probably didn't try that hard
8 because I didn't think he would want to do anything with us, and he's the governor. Like
9 I wanted -- I specifically wanted to talk to state legislators because in my estimation they
10 are the ones with the authority. So I wanted to talk to the legislators.

11 Q And you say that based on what you said earlier, that they have the
12 constitutional authority related to elections as opposed to a governor, for example?

13 That was hard to hear your response, so just for the record --

14 A Correct.

15 Q Okay. Do you remember calling Rusty Bowers or anybody else in the
16 Arizona legislature?

17 A I don't know. I mean, again, we are getting really close to attorney work
18 product. So I don't want to go too far down this lane without, you know, authority to
19 release the information. But I made a handful of phone calls, but once I got Mark
20 Finchem and he was interested and wanted to know what information we had, I kind of
21 let Finchem run with it because he was the legislator, and it was his authority. He could
22 do what he wants, and I wanted to support how I could support.

23 Q Understood. And I fully appreciate the concerns and don't want to tread
24 on them, but with respect to the legislators, I understand that they wouldn't be part of
25 the legal team or a client necessarily. So did you talk to Rusty Bowers specifically?

1 A I did not.

2 Q Okay. How about others in the legislature? Do you remember talking to
3 others?

4 A Yeah. I mean, since -- at the time, yes, I talked to Sonny Borrelli. I talked
5 to Leo Biasucci. Once Finchem wanted to, like, wanted to be the one to hear the
6 information, there was no need for me to continue to push. But once he started, once
7 Finchem started looking into it, I guess, there were others that wanted to be involved.
8 But I always -- I tried my best to kind of let Finchem do his thing because he was the state
9 legislator and that was his thing and I played a supporting role.

10 And since then I've gotten to know many Arizona legislators through my efforts.
11 So, yeah, I know a handful of them.

12 Q Okay. And just going back to that time though, specifically, when you had
13 that first or first few calls with Representative Finchem, what was the dynamic like?
14 Was he looking for information from you? Were you looking for information from him?
15 How was it working?

16 A We were just kind of like, hey, I've got concerns about the election; what
17 about you. And it was we just were talking like what can we do about it. And it's a
18 very novel issue, right. There will be law students that write papers about this in future
19 legal classes.

20 So we were just discussing it and trying to figure out what -- what does he have
21 authority to do, what's appropriate under the situation. And at the very least, I'm sure
22 he -- I'm sure we talked about information that he would want to see, you know, have
23 access to. It was very much like a hey, we both have a novel issue. Let's talk about it.

24 Q Do you remember discussing with him on those early conversations what
25 you described to us earlier that kind of plenary authority of state legislatures to --

1 [crosstalk]

2 Q BY [REDACTED]

3 Q Could you repeat that? I'm sorry.

4 A No. We did not talk about that early on at all.

5 Q Did that come up later?

6 A Later, like probably like in April. I don't -- I don't remember talking about
7 that. I don't remember talking about that pre-January sixth. It doesn't mean we
8 didn't. Maybe we did. I haven't -- I don't remember it.

9 To me that became an issue -- I feel like my recollection is probably not accurate
10 on this, but the way that I remember was that really became an issue during the Arizona
11 audit, which is April, May, June, July.

12 So I don't remember specifically talking about that at this time. The big concern
13 would have been -- this is all out in the public domain, but the concern was for the states,
14 I think Arizona, Wisconsin, Pennsylvania and Georgia had all submitted letters to Mike
15 Pence saying, Hang on. We are not sure that the election was certified appropriately.
16 Give us another chance to look at it.

17 Like that was the extent at that time that we were like, hey, just give the state
18 legislators a chance to confirm whether they want to keep, you know, the electors that
19 were certified or if they want to change them. And that was it. That was the extent of
20 the question at that time.

21 Since the audit and since other investigations have happened, there were other
22 discussions, but that has nothing to do with the January 6 stuff.

23 Q Yeah. Sure. And I'm more interested in the former of what you just
24 mentioned, the authority of the legislatures to select their own electors, or not certify, or
25 do something with respect to certification of the vote in the state. So tell us about the

1 conversations you had with Representative Fincham on that issue, the one you just
2 described.

3 A The only one that I remember on that was that he told me he had a letter
4 with signatures on it and sent the letter in. That -- I mean, that's the extent of it, I think.
5 I mean, there were --

6 Q The letter --

7 A The letter from the state legislators. They, the Arizona state legislature, I
8 don't remember how many there were, but there was a number of state legislators that
9 said they signed a letter expressing concerns about the election. On that topic, that's
10 the only thing I remember talking to Fincham about.

11 Q And that letter being a letter addressed to Vice President Pence?

12 A I believe so. Yes.

13 Q Did you recall ever encouraging Representative Fincham to not certify the
14 election to the extent he could, or decertify the election, or select the Trump electors as
15 the state legislature under some theories might be able to do?

16 A At that time, no. Afterwards I reported on -- I mean, it was all open source.
17 You can see my reports. I reported on like what the legislature was doing, and I
18 interviewed him on it. But I don't -- I don't remember. The only thing I can say like I
19 know happened was the letter that was sent to Mike Pence.

20 Q Okay. Did the campaign or the legal team have any role in drafting that
21 letter, encouraging that letter?

22 A Drafting the letter, I would say no. I mean, I did not, and I don't think Rudy
23 did. If -- I doubt Jenna or Boris did, so I don't believe -- I can only speak for myself. I
24 did not. If others did, I don't know about it. Encouraging the letter, I mean, that's
25 a -- that's kind of a loose term.

1 It's possible that somebody on the legal team was like, yeah, it would be a great
2 idea. I don't know. But I don't have -- I don't specifically remember -- I mean, I don't
3 know.

4 Q Do you remember encouraging any state legislatures whether in -- state
5 legislators, excuse me, whether in Arizona or otherwise to sign on to a letter like that to
6 Vice President Pence?

7 A I don't remember. I don't think so. I -- I also am not super confident in
8 my recollection, but as I sit here today, I vaguely remember being surprised to get the
9 letter, like not like, oh, I didn't even know this was happening, like, like happy to see it.
10 So I don't think I did, but I honestly don't remember.

11 Q Still on the Dominion voting machines, or voting machines more generally
12 issue, do you remember Mr. Giuliani or anybody on the legal team calling first the Antrim
13 County prosecuting attorney to request that he turn over voting systems and voting
14 machines?

15 A I don't know anything about the machines in Michigan. The role that I
16 played was with the witnesses and the GOP, the folks on the ground. I don't know
17 anything about the Michigan machines.

18 Q Do you know whether Mr. Giuliani, you or anybody else on the legal team
19 asked anybody to get access to voting machines?

20 A I don't know. I know there was talk about the Antrim County. I think
21 Matt DePerno with the Bailey case where they got access to the machines. So I know
22 there was talk about that.

23 To the extent that someone said can you get access to the machines, that sounds
24 weird. And so, no, I don't think anybody would have, certainly not surreptitiously, but
25 to my knowledge I thought we had access through -- we, not we, but like Matt DePerno

1 had access through his Bailey case. So from my perspective, like there was somebody
2 looking into it. It wasn't necessarily our legal team, but I was curious what they would
3 find.

4 Q And tell us about that. So who is Matt DePerno?

5 A Matt DePerno was the attorney for William Bailey in the Bailey versus
6 Antrim County lawsuit that actually got access to the voting machines.

7 Q And what relationship did you or the Giuliani legal team, the Trump
8 campaign have with Mr. DePerno?

9 A At that time, none. We were just watching the case. We -- I reached out
10 to him and I've since got to know him. He's now running for attorney general in
11 Michigan, but I didn't know him before the case.

12 Q And when say no relationship, no formal relationship. He wasn't working
13 for the campaign. Is that what you mean?

14 A Like we didn't even know each other. Like we had literally no relationship.

15 Q Do you know if he was sharing information with the campaign that he was
16 getting from that case?

17 A I'm sure he would have, but I don't think -- that case went past January 6th,
18 so I think, I don't -- I don't know. I don't remember the timeline, but I -- to me, the
19 information that came out from Antrim County came out after January 6, I think. During
20 like November to Januaryish time frame, I don't remember, I don't remember getting any
21 specific information from Matt DePerno.

22 Q If we could just -- this is jumping ahead just a little bit, but if we could pull up
23 Exhibit Number 11. So the judge in that Bailey case issued an order mid December
24 granting access to certain voting machines, Dominion voting machines. And there's a
25 report that came out called the Allied Security Operations Group Report came out

1 December the 13th.

2 A Um-hmm.

3 Q Does that refresh your recollection as to kind of the order of operations with
4 respect to access to voting machines in Michigan?

5 A Yeah. So this, obviously this report came out in mid December, but there
6 was another -- they had another expert look into it, because I remember it because we -- I
7 was not doing like media interviews on the legal work that I was doing, and I did one on
8 this, which is why I believe it was after my role.

9 Q I see.

10 A I reported on this. And I wasn't reporting on what I was working on until
11 after I was done with it, so that's why I think it was January 6 but, you know, it could have
12 come out sooner. There was another expert. This isn't the -- I did report on this
13 report, but there was another interview that came out that OAN did with one of the
14 experts in the Antrim case. It was not Russ Ramsland. It wasn't this ASOG group. It
15 was another one that I think was probably like Februaryish.

16 But, anyway, sorry. I guess it doesn't really matter. What's the question?

17 Q Yeah. As I've mentioned, so this came out as a result of a judge's order in
18 that Bailey case that was on December 6. And right after that, Jenna Ellis said that
19 essentially it was a good day, or something to that effect, because we got access to the
20 machines.

21 And so I'm trying to just better understand what role the campaign was or what
22 the information they were getting as a result of this Bailey case and why Ms. Ellis, for
23 example, would say, you know, we got access?

24 A Yeah. No, we had access in the sense that it was now out in the public
25 domain, like the report was made public, but like we didn't -- the campaign legal team did

1 not have, I mean, like privileged access or anything.

2 When she said we, I think she meant like finally somebody. And I'm --

3 [crosstalk]

4 A -- not put words in her mouth, but it wasn't we as in the Rudy Giuliani legal
5 team.

6 [REDACTED] This report is prepared by a group called the Allied Security
7 Operations Group, or ASOG?

8 Ms. Bobb. Yeah.

9 [REDACTED] And as you can see in I think in this second paragraph on this
10 document, Russ Ramsland is part of the management team of ASOG. And earlier you
11 mentioned that he was working with your team.

12 I mean, is there -- is it fair to say that the Giuliani team had at least some
13 connection with the group that was investigating these machines or had access to them?

14 Ms. Bobb. I think it's bit of a stretch. They are expert witnesses. And expert
15 witnesses often work on multiple litigations. Just because you are an expert witness in
16 one case and in another case doesn't mean those two cases are related. And that's
17 what this is. They -- they were working as expert -- Phil Waldron, and to the extent that
18 Ramsland is an extension of Waldron, they gave us some information, but this they were
19 working as experts specifically for Matt DePerno's case. This was not on behalf of the
20 Giuliani team.

21 BY [REDACTED]

22 Q Do you know why Miss Friess, Friess, I'm sorry, Katherine Friess traveled to
23 Antrim County in November to gather evidence from Dominion voting machines?

24 A I don't know.

25 Q Do you know that she went to Michigan in late November related to voting

1 machines?

2 A Yes. I did know that.

3 Q Okay. What do you know about that?

4 A That she went to Michigan. That was it. I didn't work it with her, but I
5 know that she went.

6 Q Did you understand that her trip was related to what was happening in the
7 Bailey case and getting access to voting machines?

8 A Probably. I mean, I didn't like make those mental leaps at the time, but as
9 we sit here, I can probably say that's probably accurate.

10 Q Do you know what information Ms. Friess was able to collect during that trip
11 she made to Michigan?

12 A I don't know. You would have to ask her.

13 Q And at one point Mr. Giuliani claimed his team spent eight hours analyzing
14 the machines from Michigan. Do you remember him talking about that?

15 A No.

16 Q I believe the judge in that case ordered that the ASOG report be released
17 sometime around mid December 14th. Are you aware of anybody on the legal team,
18 the Giuliani legal team having access to Mr. Ramsland's report before it was officially
19 released?

20 A I don't think so. I didn't. I don't think so. I don't know. I didn't. I
21 can't say if anybody else did or not, but I didn't.

22 Q Have you ever heard of somebody named Conan Hayes?

23 A Yes.

24 Q Who's that?

25 A He is a computer guy who worked with Phil Waldron, and --

1 Q Do you know if --

2 A -- Russ Ramsland, I think.

3 Q Okay. And I'm sorry for cutting you off. Did you say you think he may
4 have also worked with Russ Ramsland?

5 A I believe so. I don't know exactly, but I assume they are all together.

6 Q And do you know if Mr. Hayes had any role in analyzing the Dominion voting
7 machines in Michigan?

8 A He could have. I don't know. As you can tell, I don't have a lot of the
9 information about that research, but he could have.

10 Q I think there's been public reporting, and I hope I'm not going to
11 mischaracterize it, but I think there's public reporting that Patrick Byrne provided a
12 private plane to fly people to Michigan related to inspection of voting machines. Do you
13 know anything about that?

14 A Patrick Byrne, I know he was very active in doing this. He was not part of
15 what we were doing. He did have a private plane. He used it. Who he had on it or
16 where they went, I don't know. You would have to get it from him, but it's plausible.

17 Q Do you know if Ms. Friess was on that plane?

18 A If Patrick Byrne had a private -- like chartered a plane for them to go to
19 Michigan, she was probably on it, if she went. I mean, I believe she went. I believe
20 that that, like, that's kind of what happened. I just don't know.

21 Q Okay. What's your understanding of Mr. Byrne's role with respect to
22 financing any inspection of voting machines, if any?

23 A Oh, he's been very interested in it and he's started -- I have not personally
24 worked with him on it. I have not personally worked with his efforts, you know, in the
25 time frame that we are talking about. I don't know exactly what he's done, but I do

1 know that he was very curious and passionate about it.

2 And, yeah, and he's got a lot of finances, so I'm sure he financed a lot of stuff, but I
3 don't know what it was or what he did.

4 [REDACTED] Did you ever fly in a plane that was financed by Mr. Byrne?

5 Ms. Bobb. No.

6 [REDACTED] All right. If we could pull up Exhibit Number 10, please.

7 Ms. Bobb. Actually, no, I did not. Sorry. I was on a private plane once, and I
8 think -- I think that was Rudy's. I don't know who it was. Byrne was on it. No one on
9 Byrne's team was on it.

10 Where did we go? I don't remember, but I think it was to Florida. I don't know.
11 But it wasn't -- I don't think it was Byrne's stuff, but in case I'm wrong, I'm letting you
12 know I might be wrong.

13 [REDACTED] Okay. And just to be clear, this was Mr. Giuliani's private
14 plane?

15 Ms. Bobb. He doesn't have a private plane. It would have been -- I don't know
16 how people with private planes do it, but like they help each other out. I don't know.
17 It's like an Uber. I don't know how you do it, but somebody had it, so...

18 BY [REDACTED]

19 Q So this issue related to voting machines, and Antrim in particular and
20 allegations about vote switching, and as a result of Dominion issues it was pretty
21 important in Michigan. So as somebody who was involved in the Michigan efforts for
22 Mr. Giuliani and his legal team, how come you weren't more involved in these issues,
23 Dominion and Antrim County?

24 A Because it wasn't our focus. Our focus was what Rudy would call
25 traditional litigation, like witnesses, affidavits, physical evidence. The machines are very

1 interesting, and I would like to know if they are secure, and we are curious about whether
2 they are secure. And to the extent that there is evidence of problems with them, you
3 know. There is evidence of problems with them. Democrats in 2019 wrote a letter
4 about all the problems they have with voting machines.

5 So the whole discussion of voting machines I think is a healthy one, but our focus
6 was traditional litigation, get witnesses, get affidavits, get, you know, physical evidence.

7 Q One of the allegations that was used quite frequently was that there was a
8 6,000 vote switch in Antrim County or something to that effect.

9 A Yeah.

10 Q I believe that's directly related to Dominion voting machines and issues with
11 that. So I guess I'm trying to understand why there's not more of a correlation. If the
12 legal team is making this claim about 6,000 vote switches, how could you not also be
13 looking into the Dominion voting machines?

14 A They could be. I'm telling you I wasn't looking into voting machines but,
15 you know, Colonel Waldron and like there were people looking into it. To the extent
16 that Mayor Giuliani wanted to look into it, I mean, you can ask him about it, but my role
17 with Rudy was traditional litigation.

18 Q Okay.

19 [REDACTED] Maybe I'm misunderstanding, but why did Mr. Giuliani not feel
20 that issues with the Dominion voting system machines could be like a component of
21 traditional litigation?

22 Ms. Bobb. You'll have to ask him that. And I'm not saying that he didn't think
23 that was it at all. I am telling you my role with him was to do litigation. He could be,
24 you know, he worked with Colonel Waldron. I know Colonel Waldron gave him
25 information. Dominion voting machines for Mayor Giuliani was not part of my role.

1 [REDACTED] Understood.

2 BY [REDACTED]

3 Q Do you know whether Mr. Giuliani or others on the legal team believed that
4 the Dominion allegations and the vote switching and error rates had merit?

5 A I think we all -- are you talking about at that time frame?

6 Q Yes.

7 A I think we all were interested in knowing that. I don't know. I mean,
8 you'll have to ask him what he thought, but I am interested in what happens with it.

9 Q And do you know whether Mr. Giuliani and others thought that the
10 machines had been hacked by foreign countries or foreign entities, for example, related
11 to the November election?

12 A I don't know. I don't think -- I don't know. I don't think that Rudy thought
13 that they -- I don't think Rudy thought that there was a foreign issue, but I don't
14 remember. You'll have to ask him. We were not focused on foreign interference.

15 I mean, it was a discussion, you know. There were allegations about it and stuff,
16 so I am sure we had a conversation or two about it at some point, but that wasn't like
17 what we were focused on.

18 Q And you mentioned what the understanding was then, but what about now?
19 I mean, as you sit here now, do you think these Dominion allegations, some of which we
20 have just gone over, had merit, or do you know? Are you in a place to even know that?

21 A You asked me that before, and I would say the same thing I said before,
22 which is I am very curious to know. I think there's problems with it. I think the fact
23 that they are not open and honest and not letting people see what they are doing is very
24 concerning. So I still have concerns about Dominion. Yes.

25 [REDACTED] Do you have a sense of why there wasn't a focus on foreign

1 interference? Was it just that attention was focused elsewhere or was it that, you
2 know, there was these investigations weren't productive?

3 Ms. Bobb. I think there's plenty of evidence of domestic interference that we
4 don't even need to get to foreign interference. Maybe there's foreign interference too.
5 I don't know. But there's plenty of evidence of domestic problems so, you know, let's
6 focus on that first.

7 BY [REDACTED]

8 Q All right. So we have up here Exhibit Number 10. This is just a cover
9 sheet. It's called Dominion Voting Systems. And then it's overview dated 12/2/20.

10 You scroll down there, it says, History, executives, vote manipulation, ability and
11 design, foreign ties, and Mrs. Friess's name is on there.

12 Have you ever seen this before?

13 A I've never seen it.

14 Q Did you know that Ms. Friess was working on a report related to Dominion
15 voting machines?

16 A I did not.

17 Q There's some suggestion that Ms. Friess took over this report for somebody
18 else named Joanna Miller. Do you know who Joanna Miller is?

19 A I do know Joanna Miller. She at the time was like a 22-year-old aide to
20 Pete Navarro. There's no way that -- no.

21 Q What was her role with -- if anything, related to claims of fraud or looking
22 into allegations of improprieties related to the election?

23 A She helped Peter Navarro. I mean, she worked for him. And Peter put
24 out his three reports, whatever, and Joanna did a lot of research on that. And this could
25 be a compilation of Joanna's work. She's very smart and very capable.

1 I had not seen this before, but if she took it over, it was -- it was -- Joanna was
2 junior enough that she wouldn't put her name on a report. Do you know what I mean.
3 It would have been she would have been providing research to Peter, and Peter would
4 have owned it to the extent that he wanted to use it. I don't -- Joanna would not have
5 been drafting a report in and of herself.

6 This could be -- I don't know. I mean, I've never seen this document before, but
7 it could be something that Joanna put together and was planning on giving to Peter or
8 something, but she would not have put her own name on it.

9 ██████████ And you can take this down, ██████████ Thank you.

10 BY ██████████

11 Q Did you work with Ms. Miller on anything related to the election?

12 A Well, not -- yeah, kind of. I mean, at the very end, like probably late
13 December or January. I'm sorry. What was the date of that report?

14 Q This was dated December 2, at least on the cover page.

15 A All right. So I would have gotten connected with Joanna later, probably like
16 maybe right before Christmas. And I remember sharing information with her, I guess,
17 you know, trying to check my own work and check numbers because she had done work
18 for Peter Navarro's reports. But it was nothing more than that, just being like, hey,
19 where did you get -- you know, checking her sources, checking my sources. We had a
20 couple conversations about it, but that was it.

21 Q Who connected you with Ms. Miller?

22 A Probably Peter. Rudy and Peter worked together, and they probably had
23 us -- I don't remember. I'm guessing.

24 Q Were you asked to work with Ms. Miller to compile any information or do
25 anything in particular?

1 A I don't remember specific, like, hey, will you work with her but, you know,
2 Peter Navarro was looking into the election stuff. Rudy was looking into the election
3 stuff. So it made sense that we would share notes. I say that informally, share notes,
4 but that's it.

5 Q Did you think it was odd that she being a White House aide or employee was
6 doing this with Mr. Navarro looking into claims related to --

7 A No. I -- foreign -- based on the report, if it's foreign interference, I think
8 that's perfectly appropriate to do.

9 Q And Mr. Navarro of course is a trade advisor in the Administration --

10 A He wasn't -- (audio distortion)

11 Q Say that again. I'm sorry.

12 A He was also the advisor on China. Peter Navarro has a very broad range of
13 capabilities and abilities. And so, no, I do not think it was inappropriate for them to be
14 looking into this.

15 Q And so did you help -- let me start over. Mr. Navarro ultimately released a
16 three-part report, I'll refer to it as the Navarro Report. What was your role, if any, with
17 respect to that?

18 A Nothing. I mean, he was doing that -- Joanna and I talked a little bit, but I
19 don't -- we never like shared document. Like I said, I never even saw the document, but
20 no. They did their thing. We were doing our thing. And to the extent that we had
21 questions or whatever, I would ask her. That was it. It wasn't --

22 Q What did you do with the information that Ms. Miller gave to you?

23 A I don't remember what she gave to me. Like there wasn't anything specific
24 that like either -- I don't remember her, I mean, I don't remember specifics of it. You
25 know, I just remember us talking about stuff. And I used the term comparing notes kind

1 of metaphorically, but I don't remember like an actual swap of anything.

2 Q Was it your understanding that she was helping Mr. Navarro compile this
3 report he was working on?

4 A When you said the report, you are talking about his three-part report?

5 Q Correct.

6 A I believe Joanna worked on that, but I don't know.

7 Q Did she tell you that?

8 A No.

9 Q What about Garret Ziegler. Do you know who that is?

10 A I do. He also worked for Peter Navarro.

11 Q What was your interactions with Mr. Ziegler, If any?

12 A Similar, similar to Joanna. They are young staffers who were, you know,
13 avid researchers doing research on stuff, and we talked.

14 Q Tell us about this conversation. What did you guys talk about?

15 A Garret and Joanna are -- it's like they are interchangeable. They sat right
16 next to each other outside of Peter Navarro's office, and to the -- I don't have a specific
17 thing that I can say this was the exchange of information, but I -- I remember talking to
18 them.

19 Q Okay. And without getting into necessarily to the specifics or seeking from
20 you the exact information you gave to them, what was your understanding of what they
21 were doing with the information or the help that you were giving them?

22 A I don't know. I mean, same thing we were all doing, just trying to figure
23 out what happened. I didn't ask, hey, are you compiling a three-volume report on this,
24 like, I don't know. We were just talking.

25 Q And Mr. Navarro has said, I believe, that much of what he and his team

1 included in the Navarro -- the three-part Navarro Report came from Rudy's team. Is that
2 accurate so far as you understand it?

3 A Yeah. It could be. I mean, I don't know. I did not help compile Peter's
4 report. So I don't know what they did or how they got it. But I shared, like I -- I don't
5 have a specific recollection of this happening but, for example, what could have
6 happened is Joanna could have called me and said, hey, I am looking at this information.
7 Does this jibe with the information you have. And I would have said yes or no.

8 So I -- I did not know they were putting together a report. It was just we were
9 just trying to check and make sure that we were accurate in our work.

10 Q And who else from Mr. Giuliani's legal team was working with Ms. Miller or
11 Mr. Ziegler or Mr. Navarro?

12 A I think Katherine Friess did for a little while. I don't know. Katherine and I
13 actually did not work very closely together. She was, as you can tell, doing other things
14 than what I was doing. So I don't know what she did with Peter Navarro or not, but as
15 far as I know it was just Joanna and Garrett.

16 Q If we could pull up Exhibit Number 13. And while that's coming up, do you
17 know where Joanna and Garrett were getting their information from?

18 A Nope.

19 Q Do you know where Mr. Navarro was getting the information that went into
20 the report from?

21 A No, but I think he cites his work, right? Doesn't he -- isn't it in the report?

22 Q So on this Exhibit Number 13, this is an email from Jenna Ellis to Jason Miller,
23 Tim Murtaugh, Ross Worthington, Vince Haley, and Mr. Giuliani. This is from December
24 7th.

25 A Okay.

1 Q Subject is -- and you are not on this. So, to be clear, I won't ask what your
2 role is in this.

3 A Okay.

4 Q But it says, Updated PowerPoint and sources, along with tables with
5 footnotes and voter fraud, state-by-state election fraud and otherwise. And then she
6 says, Ms. Ellis says, Here's the updated PowerPoint on state-by-state for POTUS. And if
7 we go to page 2, it begins a series of charts and other information.

8 If I'm not mistaken, some of this information in a similar or the same form appears
9 in Mr. Navarro's report.

10 A Yeah, I --

11 Q Do you remember seeing any of these charts?

12 A It looks like what's in Peter's report. I have read his report, but I don't
13 know. I didn't ask. I don't know where this came from.

14 Q Ms. Ellis sent this, like I just mentioned, to others. Do you know what her
15 role was with respect to helping Mr. Navarro or Mr. Miller, Mr. Ziegler with the research
16 they were doing for their Navarro report?

17 A I'm not aware of any, but I don't know.

18 [REDACTED] Do you have any questions on this document?

19 [REDACTED] It looks like Ms. Ellis in addition to sending this to Mr. Jason
20 Miller and Tim Murtaugh sent this to Ross Worthington and Vince Haley, who I
21 understand to be on the White House lead training team. Do you know if there was
22 some sort of channel for conveying information was being developed through the Giuliani
23 team's legal effort into the speeches that President Trump was delivering around this
24 time?

25 Ms. Bobb. I have no idea.

1 Q [REDACTED] Okay. If we could pull up Exhibit Number 12, please.

2 BY [REDACTED]

3 Q This is a document you provided to us. And it's a COMs alert from
4 @GOP.com to apparently to a mailing list about Dominion voting demands, Sidney Powell
5 retract baseless election claims. And then Jason Miller sends it to a number of people
6 saying flagging.

7 And you are on the recipient list of that email, and then you reply and say, Sounds
8 like they are sending these to everyone, and then asterisk, angry face. Do you
9 remember this email?

10 A No. But it sounds like something I would say.

11 Q Why reading it now and looking at it, why did you say angry face?

12 A I don't know. Can you show me what it was that they sent?

13 Q Yup. We can scroll down to the bottom. It says that Dominion voting
14 systems sent a letter to former Trump campaign lawyer Sidney Powell on Wednesday,
15 demanding that she retract her wild and knowingly baseless and false accusations about
16 the company's voting machines.

17 A Yeah. I can see it. So, I mean, I don't remember sending it. Obviously I
18 did, but I probably said the angry face because it's frustrating when you are
19 actually -- when you have leads and you have good evidence and you are following your
20 leads and you are trying to investigate and everyone's going, There's no evidence.
21 There's no evidence. Retract your wildly knowingly and baseless and false accusations.
22 That's not true.

23 That wildly knowing baseless and false accusations is not true. It's never been
24 true. I know the media said it, but we have information and apparently Sidney had -- I
25 don't know what Sidney had. You would have to ask her. But it's just frustrating to

1 have some -- you hear all the time, Oh, there's no evidence of fraud; there's no evidence
2 of fraud; there's no evidence of fraud.

3 There's a lot of evidence of fraud. There's a lot of evidence of fraud. And so to
4 have everyone, you know, send a note like this, or have Dominion send a note like this
5 that says retract your statement; no, I'm not going to retract my statement. What I said
6 is true.

7 I'm guessing. I don't know. But that's probably the sentiment that I had at the
8 time.

9 Q So if you look at the bullet points on here, this says, Specifically Powell's
10 claim that the company worked with Hugo Chavez, the late Venezuelan dictator and
11 employed machines with a vote-flipping algorithm; and then it says, The Trump campaign
12 announced in November that Powell is no longer working with President Trump or the
13 campaign after a wild press conference in which she said President Elect Biden won the
14 2020 election thanks to, quote, Communist money from the Venezuelan regime.

15 So are you saying -- you just mentioned that you thought that there was evidence
16 of claims related to this, and that might have been why you said angry face. Are you
17 aware of evidence that the legal team had for those two bullet points that I just read to
18 you?

19 A I don't know specifically, but I do know that I think it's Smartmatic,
20 Smartmatic is a Venezuelan company. And you'd have to -- I haven't -- again, I wasn't
21 researching Dominion. I wasn't researching Smartmatic. That was not my role. But I
22 do think there is -- I don't -- those claims, you know what, I don't know. I don't know.

23 There are -- there are pieces of evidence that, you know, those claims didn't come
24 out of thin air. I don't know what they are. I don't know the veracity, you know, the
25 extent to what they go, but I don't know. You'll have to ask her.

1 [REDACTED] All right. We can pull that down. Bear with me just a moment.
2 Mr. Sibley. [REDACTED] when you get to a break in the line, if we could take a
3 short lunch break would be great.

4 [REDACTED] Yeah. Absolutely. And this actually may be a great place for
5 that. Why don't we do that now. Let's go off the record.

6 [Recessed at 1:17 p.m.]

7 [REDACTED] Let's go back on the record. It's 1:46 p.m. Eastern. And we are
8 resuming the interview of Ms. Christina Bobb.

9 I'm going to ask to pull up Exhibit Number 15, please.

10 BY [REDACTED]

11 Q Ms. Bobb, this is not a document that you produced, but let's see if you
12 recognize it. All right. So this is a document dated December 16, 2020. It says,
13 Presidential Findings, to preserve, collect and analyze national security information
14 regarding the 2020 general election.

15 Do you recognize this document?

16 A I think so. Can you scroll, please?

17 Q Of course.

18 A Can you scroll some more. Keep going. Okay. So I don't know if I have
19 this exact document. I know this is the executive order that was like in the news or
20 whatever.

21 Q Yes. This is one of two executive orders. This one in particular dated
22 December 16 talks about the Secretary of Defense seizing voting machines. And then
23 there's also another one, also dated December 16, that talks about the Department of
24 Homeland Security.

25 A Yeah. So I remember this. This was something that Colonel Waldron -- I

1 don't know who exactly he was working for. I can tell you I was invited to a lunch with
2 Colonel Waldron. Colonel Waldron was going to lunch. They invited me. He was
3 doing work for, I don't know, I shouldn't say he was doing work for. He was connected
4 to the Sidney Powell/Patrick Byrne camp, which I was not connected to. And he was
5 like, hey, do you want to grab lunch.

6 So I went to grab lunch and was there for lunch, and they started talking about,
7 you know, strategizing and trying to figure out how to get information to -- I don't know
8 exactly the extent of this document. But how it came about was when I was there, I had
9 my laptop with me. And I was the only one there that had a laptop or something to
10 work on, and they asked me if I could start a document to take notes for them on this.

11 And I started the document, took their notes down, whatever. And then Colonel
12 Waldron asked me to email it to him, which I did. What happened with it from there, I
13 don't know.

14 So I don't know. I'm not sure that this -- I don't know. I don't know if this
15 is -- this looks like what I originated on my computer, but I think it went past whatever I
16 had done, because what I had done, I think -- when I say I had done, I started the
17 document. They wanted to work on it. They used my computer to work on it, and
18 then when they were done doing whatever they were doing, said, hey, can you email this.

19 And I think that's probably it, but I am not -- you know what I mean, like, I don't
20 know what they changed after it left my computer.

21 Q Yes.

22 A But I had some role in initiating something like this in the sense that I had a
23 computer that people wanted to use, and that was it.

24 Q Okay. All right. So let me unpack some of that. You are with Colonel
25 Waldron. Who else is there?

1 A It was people that he was working with. I don't know their names. I
2 know there was a guy named Mike. I don't know his last name. And it was folks
3 that -- like it was the machine team folks that, you know, I didn't really know them.

4 Q Do you know if Mr. Ramsland was there?

5 A I know Russ. He was not there, I don't think. I mean, he wasn't there
6 when I started this. If they moved him into this later, possibly. But when I was at the
7 lunch, because I know Russ, so I would have known if he was there.

8 Q And where was the lunch?

9 A Trump International Hotel.

10 Q And do you know roughly when?

11 A Well, if it's dated December 16, I would guess sometime slightly before that,
12 but I'm not sure.

13 Q If you go back to that guide post that we used before of the Electoral College
14 meeting and voting on the 14th, do you think it was before that or after that?

15 A I think it was probably on December 16.

16 Q Okay. Do you remember General Flynn being there at the lunch?

17 A He was not there, because I know him.

18 Q All right. So far we have Mike, Colonel Waldron, you --

19 A I'm sorry. I didn't mean to interrupt you.

20 Q That's okay. And a few others from Colonel Waldron's team?

21 A Correct.

22 Q Anybody else that you recall?

23 A No.

24 Q What about Sidney Powell?

25 A She may have been. I don't know. Like because I gave them my

1 computer, they finished doing whatever they were doing. While they were doing that, I
2 was working from my phone and taking calls, so I would step out and come back in.

3 So to the extent someone came in and out, I don't know, you know.

4 Q When you started working on this, or what became this document, were you
5 working with something else as an example? Like did you have another executive order
6 that you used as a model?

7 A Probably. And I wasn't -- like I probably just found one and put it together,
8 but just so you know, I was not putting -- I didn't do the substance and stuff of this. Like
9 the authorities that they used and all that, I didn't do that. I just literally just like
10 formatted it.

11 Q Okay. So the authorities that -- you are talking about that first paragraph?

12 A (Indiscernible) -- the entry -- three, 13848, those authorities, like I didn't
13 choose those authorities. They did that. I literally -- (audio distortion) -- December
14 16th, like I put it in. I literally started a Word document and gave it to them to work on.

15 Q And were you typing up from scratch or did you have something else that
16 you were modifying?

17 A I wasn't typing it. So the -- like I probably -- I probably did pull up an
18 executive order just to see like the title, but literally past the title, I did not provide that
19 content.

20 Q Okay. You gave your computer to Mr. Waldron. Is he the one that was
21 typing on your computer when they were working on this document?

22 A He did some of it, and then this guy Mike, whoever he was, was doing some
23 of it. I don't know. It was like they were brainstorming collectively and working. I
24 don't know.

25 Q One of the things you mentioned there in the authorities, just past those

1 that you referred to, are National Security Presidential Memoranda 13 and 21.

2 Did you have anything to do with inserting those?

3 A No. I had nothing to do with the authorities.

4 Q Okay. Do you know who chose those two Presidential Memoranda 13 and
5 21 to include on this?

6 A No.

7 Q Do you remember Colonel Waldron or Mike or anybody else typing --

8 A Colonel -- I'm sorry. I don't mean to interrupt you.

9 Q That's okay. Do you remember them talking about presidential
10 memoranda?

11 A I remember vaguely, like I don't have a good recollection. I'm going to give
12 you what I think I remember. And I remember it sounded like they wanted to do
13 something intelligence related, and EO 12333 is like the standard intelligence authority.

14 So I remember thinking that that made sense. And then I remember thinking I
15 have no idea what they are doing with the other stuff. That's the extent of my memory.

16 Q Okay. As far as the next paragraph it says, I, Donald J. Trump, President of
17 the United States, find that the forensic reports of the Antrim County, Michigan, voting
18 machines released on December 13th -- and then it goes on.

19 Did you have any role in writing this either as a scribe or something that you came
20 up with?

21 A I definitely didn't come up with it. I could have been a scribe. I mean, I
22 was -- I was a scribe for a lot of things. And, like I said, I started this document. I
23 don't -- like I've also said, I don't have the information on Dominion voting systems.

24 So if I physically typed this out, I had to have someone dictate it to me because I
25 don't have this information.

1 Q Tell us about the conversations you had with Mike and Colonel Waldron
2 about this. Like what was the purpose of it, as you started to draft and pull up an
3 example --

4 A I didn't -- I honestly didn't have a whole lot. They had mentioned that they
5 were brainstorming some type of proposal to see if there was some government action to
6 be taken on machines or whatever. I don't know a lot about the machines. I don't
7 have a lot of information on the machines. And I was more curious about the
8 authorities because, you know, I didn't know what authority they would use to do it.

9 And the two documents, one being DOD, one being DHS makes sense because I
10 remember, you know, there was posse comitatus issue and they were talking about, you
11 know, like ODHS needs to be the lead because the military can't do it, whatever. I don't
12 know. I don't even think I weighed -- I do not remember weighing in on anything
13 substantive about this.

14 Q Okay. So that was going to be my next question. Without disclosing any
15 legal advice you may have provided, were you asked to provide legal advice about this
16 and weigh in from your perspective as a lawyer?

17 A I don't think so. No.

18 Q If we go to the bottom of this page, so bottom of page 2, the order, if signed,
19 would direct a few things: One -- and they are all listed at the end here. The first one
20 is Secretary of Defense shall seize, collect, retain and analyze machines, equipment,
21 electronically stored information and material records. It goes on to describe some of
22 what those are.

23 If you go to the next page on number 2, it says, Within seven days of
24 commencement, the initial assessment must be provided to ODNI. Number 3, DNI shall
25 deliver this assessment and supporting information to the President, among others.

1 Then it talks about a direct liaison. It also talks about using National Guard support
2 potentially, as well as assistance from the Assistant Secretary of Defense for Homeland
3 Security, coordinating with the Department of Homeland Security. And then the last
4 one talks about the appointment of a special counsel to oversee this operation.

5 On the last point there, it says that the appointment of a special counsel to
6 oversee this operation, institute all criminal and civil proceedings as appropriate based on
7 the evidence collected and provided all resources necessary to carry out her duties
8 consistent with federal laws and the Constitution.

9 What do you remember about any discussions related to the appointment of a
10 special counsel in connection with this document?

11 A I have limited -- like I have hazy recollection, but based on the fact that it
12 says "her," I'm guessing they were probably thinking Sidney would get appointed, but I
13 can't confirm that.

14 Q Okay. Do you know why Colonel Waldron wanted Sidney to be appointed
15 as a special counsel?

16 A I don't.

17 Q Tell us about any other conversations about having Ms. Powell or anybody
18 else appointed as a special counsel with respect to election issues.

19 A I don't -- I don't have any information on it. It was never anything that I
20 worked on or pushed. It was certainly never anything Rudy -- I don't remember
21 anything about it. It wasn't anything I worked on with Rudy. I do remember, you
22 know, the effort to create this thing, but I don't know. This was not my brain child, so I
23 don't know.

24 Q Now, working on their -- on your computer, how does it get to that? And
25 I'm sorry if you already said this.

1 A Yeah, that's okay. When they were done with it, they gave me my
2 computer back and said -- I don't remember who said it, but it was probably Phil said can
3 you email this to Phil, or can you email this to me. And I sent it to Phil from there, and
4 that was it.

5 Q Do you know what Colonel Waldron or anybody else did with this or the
6 other executive order, so the DOD or DHS one?

7 A I don't know. I don't know if they continued to tinker with it. I don't think
8 it ever went anywhere. I think it was somewhat of an academic exercise to see if there
9 were government authorities that could assist, but I -- to my knowledge, nothing ever
10 came of it.

11 Q Do you know whether this was ever -- or either of the executive orders we
12 are talking about were ever presented to the President for his consideration?

13 A I don't. To my knowledge, they were not, but I don't -- I mean, I can't
14 confirm if someone else did it, but I don't think this ever made it to him. I don't know
15 what --

16 Q I'm sorry. I interrupted you. What was the last part you said?

17 A I just said I don't know how it would have gotten there. I don't know how it
18 would have gotten to his desk, because Rudy wasn't doing it, so I don't know who they
19 would have given it to him, who would have done it. I don't know.

20 Q Other than any privileged conversations or protected conversations you
21 might have had, are you aware of any conversations other than presenting these
22 documents, but any conversations with the President or anybody in the White House
23 about using an executive order to seize voting machines?

24 A I'm not aware. I don't have personal knowledge of anything. I read
25 media reports that something like that happened, but I have no personal knowledge of

1 that.

2 Q One of the presidential memoranda -- before I get there, you mentioned two
3 executive orders which made sense because of issues related to -- or possible issues
4 related to posse comitatus.

5 Do you remember there being a discussion with Mr. Waldron or by Mr. Waldron
6 with others about this concern that using the military to seize voting machines could look
7 like a domestic law enforcement function?

8 A Yeah. Yeah. I don't know what lawyer they were going to run this
9 through or how they were going to do it, but they were trying to follow the law. I mean,
10 obviously it's an executive order. It's got to be legal in order for it to be signed. So,
11 yes, they were talking about that.

12 Q Did you express any reservations about this discussion about a possible
13 executive order or this document that was drafted to be sent to them?

14 A No. I mean, I mean, it was like not a thing that I thought was -- no. I had
15 no concern at the time, nor do I have concern about it now.

16 Q One of the presidential memoranda that we talked about briefly is number
17 21. And I understand that until this was reported publicly, that the existence of that
18 memoranda was classified.

19 Do you know who got information about this memoranda 21 and how that
20 specifically was inserted into the draft EO?

21 A Nope. I have no idea.

22 Q Do you remember who did draft that section? Was it Colonel Waldron
23 himself or somebody else?

24 A I have no idea, because like I said, I kind of handed off my computer and was
25 working from my phone. So I have no idea who drafted what. To be clear, I had a

1 clerical role in it, starting the document. I don't, you know -- but I didn't draft that, nor
2 do I know who did.

3 Q Okay.

4 [REDACTED] Do you have any follow-up questions on this? If we can pull up
5 Exhibit Number 16.

6 BY [REDACTED]

7 Q This is an email, I believe it's from Colonel Waldron to Bernie Kerik,
8 Katherine Friess and General Flynn.

9 Did you ever learn about or know about General Flynn's involvement in anything
10 related to seizing voting machines or this draft executive order?

11 A No. My knowledge of it was what at that lunch where I gave my computer
12 and let them work on it. I thought that was the extent of it. I didn't know it went any
13 further. I don't know how you -- because I don't know, I haven't seen this email, but is
14 General Flynn, is his executive order substantially similar to the one we just looked at?

15 Q Yeah. If we go to page 2 of that exhibit.

16 A Oh, yeah, there it is. It's like the same thing. Okay. No. I didn't know
17 about his role in this.

18 Q And if we go to page 5 of the same exhibit, General Flynn writes that he
19 reviewed and fixed spelling errors in the title, ensures it gets a legal review.

20 A Yeah.

21 Q And says, Ready to go from my standpoint. You don't have any knowledge
22 about that interaction or exchange?

23 A I didn't even know it went that far, but no.

24 Q Was General Flynn part of the Giuliani legal team so far as you understood
25 it?

1 A No.

2 Q Did you ever talk to Ms. Friess about this idea of seizing voting machines or
3 the draft executive order?

4 A No. This is actually the first I'm learning of it. It's kind of funny. I had no
5 idea. No. I didn't know.

6 Q Are you aware -- you can take that down? Thank you, [REDACTED]

7 Are you aware of a phone call that Mr. Giuliani made to Ken Cuccinelli about
8 seizing voting machines or possibly seizing voting machines from DHS's side?

9 A No. I don't -- I don't have specific knowledge or recollection of that call.
10 I'm sure that whenever I, you know, drafted or helped draft that document I would have
11 told Rudy that I did it, just because I wasn't -- you know, I worked for Rudy. I wasn't
12 working for General Flynn or anybody else. So I would have mentioned it, but no, I
13 wasn't aware it went any further.

14 Q Do you remember -- well, let me start over.

15 Do you know Mr. Cuccinelli?

16 A Yeah.

17 Q Did you ever talk to him about seizing voting machines?

18 A No.

19 Q Did you ever talk to him about anything related to the November election?

20 A Yeah. Publicly. I was a reporter and I interviewed him a few times about
21 the election and all that. That was all public. I never had any private conversations
22 with him about it.

23 Q And just to be clear, you are not familiar with any phone call Mr.
24 Giuliani made to him about seizing machines, separate and apart from this executive
25 order issue?

1 A I don't remember anything about it, like if -- I don't know. I don't have any
2 recollection of it.

3 Q Are you aware of a phone call that John McEntee made to Chad Wolf about
4 possibly seizing voting machines?

5 A No.

6 Q Are you aware of any effort to contact Attorney General Barr or anybody
7 else at the Department of Justice about seizing voting machines?

8 A I remember efforts to reach out to Attorney General Barr, but I do not
9 remember that about voting machines.

10 Q Could you repeat that? It was breaking up just little bit. You remember
11 what about outreach?

12 A Yeah. Sorry. It's breaking up on my end too. I remember efforts to
13 reach out to Attorney General Barr, but I don't remember them specifically being about
14 seizing voting machines.

15 Q Okay. Tell us about those efforts about outreach to Attorney General Barr?

16 A I know that they were trying to get a hold of him. That's all I know.

17 Q Do you know why?

18 A No, like not specifically on the issue but, I mean, he was the Attorney
19 General of the United States, and there was concern that there was election fraud. So I
20 can guess, but no, I don't know.

21 Q Who was involved in those efforts to reach Attorney General Barr?

22 A I remember at one point Rudy Giuliani wanted to speak with Bill Barr, tried
23 to reach out to him, and I don't think -- to my remembrance, he didn't get through, but I
24 don't know, you know, I wasn't with Rudy all the time. So I don't know if he eventually
25 got through.

1 Q Do you know if anybody from the legal team did get through to Attorney
2 General Barr?

3 A Not to my knowledge. I don't know.

4 [REDACTED] Any follow-up there?

5 [REDACTED] Just one quick question. So we can pull it up, if it's helpful, but
6 in the email that General Flynn sent circulating this to Mr. Kerik and Ms. Friess and
7 others; he asked for them to ensure that it gets a legal review.

8 Do you know who on the Giuliani team would have been responsible for
9 performing a legal review of a draft executive order like this?

10 Ms. Bobb. Well, Rudy ultimately would have been, but like I said, I don't know
11 that -- like General Flynn wasn't working for Rudy. So it wouldn't -- like I don't know
12 when he says get a legal review, I don't know who General Flynn -- you know, I don't
13 know what lawyers he would have been using. Like they would have had separate a
14 legal team. So I don't know who that is.

15 [REDACTED] Do you know if anyone on the Giuliani team or otherwise did
16 perform a legal review on the executive orders?

17 Ms. Bobb. No. Like I said, I saw them to the extent that I saw them and
18 e-mailed them out, but I did not do a legal review. To my knowledge, nobody did, but I
19 don't know. To my knowledge, I didn't even know it went past Phil Waldron. Like I
20 thought I stopped at lunch. So I have no idea what happened after that.

21 [REDACTED] Okay.

22 BY [REDACTED]

23 Q Understand that you don't know what happened after. When you emailed
24 those to Mr. Waldron or Colonel Waldron at that lunch, were the documents -- did they
25 appear to be in a complete or near complete form?

1 A I think so. I -- I think it was probably pretty close to what you have right
2 there, I think. I don't know.

3 Q All right. So on December 18, just about two days after the date on those
4 executive orders, there's a meeting at the White House with Sidney Powell, General
5 Flynn, Patrick Byrne, Emily Newman, Rudy Giuliani and others.

6 Were you at that meeting? Do you know what meeting I'm talking about?

7 A I think so. Like the business one that was all over the news; yes, I was not
8 there.

9 Q Okay. It's been widely reported. Yes. Do you know what happened in
10 that meeting?

11 A No. I remember stories that there was like drama or something, but no. I
12 don't know what happened.

13 Q Do you know whether this idea of seizing voting machines came up in that
14 meeting?

15 A No idea. Probably not, but I have no idea.

16 Q What was the level of interaction that you were having with Sidney Powell, if
17 any, during this period, mid December?

18 A Minimal. I mean, I was working for Rudy. She was running her team.
19 To the extent they were running parallel paths, I would help her how I could or -- you
20 know. Phil Waldron was working for a bunch of people. So like this EO is a great
21 example. I had a laptop and was willing to take notes on it.

22 My recollection, that EO is the only time I've had crossover between outside, like
23 people other than Rudy's team but, I mean, we were cordial and friendly but we didn't
24 actually like work together.

25 Q One person I neglected to ask, I asked about Ken Cuccinelli. Did you ever

1 have any interactions with Secretary Wolf?

2 A Yes. Sure. He was Secretary.

3 Q But after the election, so --

4 A Oh.

5 Q -- related to the election and after the election while you were working with
6 Mr. Giuliani's team?

7 A I don't think so. Oh, yes. I reached out to him about shredded ballots in
8 Georgia. There was a claim of shredded ballots, and I asked him if he knew about it. It
9 was like I think I had a 30-second or less exchange with him and that was it.

10 Q All right. What did he say to you?

11 A We are taking care of it. Like basic, he was professional about it, basically
12 like stay in your lane, you know.

13 Q Is that -- does that have to do with the truckload of ballots or purported
14 truckload of ballots that was taking November 2020 election ballots away from a site?

15 A Yeah.

16 Q Okay. Did he ever get -- or did he or anybody at DHS ever get back to you
17 on that issue of shredded ballots?

18 A No.

19 Q Did you communicate with anybody else at DHS about the election or the
20 aftermath of the election in that period while you were with Mr. Giuliani's team?

21 A I don't think so. I don't know.

22 Q If we can go to Exhibit Number 17. While that's coming up, how about
23 Chad Mizelle? Did you ever talk to him about anything related to the election while you
24 were working with Mr. Giuliani and his team?

25 A No. I mean, I know Chad because I was worked with him. I was his

1 colleague. But I don't have any specific recollection of working with him on the election
2 stuff. No.

3 A All right. So what we are putting up here is a tweet that the President put
4 out on December 19th. It says, Peter Navarro released a 36-page report alleging
5 election fraud more than sufficient to swing victory to Trump, with a hyperlink. Says a
6 great report by Peter. And then at the end there he says, Big protest in DC on January 6.
7 Be there. Will be wild.

8 Are you familiar with this tweet?

9 A No. I mean, I can read it, but...

10 Q Had you ever seen it before we are showing it to you now?

11 A I don't think so but, I mean, I know the information in it, so it's hard to say,
12 but I don't specifically remember this tweet. No.

13 Q And at that time, December 18th or 19th, or any period before that, do you
14 remember discussions about a big protest in DC on January 6?

15 A No.

16 Q Any discussions about a need to have any kind of protest on January the 6th,
17 at this time?

18 A I mean, there was the issue of Mike Pence, you know, returning the decision
19 state -- like asking the states to confirm their decision, but I don't have any recollection of
20 any type of protest or anything on January 6.

21 Q Do you know anything about Maria Ryan reaching out to Mark Meadows to
22 recommend that Mr. Cuccinelli be appointed as special counsel?

23 A No. I didn't know that happened.

24 Q On December 19, Mr. Giuliani went on to Steve Bannon's podcast. And this
25 is just after that meeting at the White House and after the executive orders. And he

1 said, Starting this morning, there's a completely different strategy.

2 Do you know anything that, what new strategy that the legal team or others were
3 shifting to in this period of mid December?

4 A Rudy said that on Bannon's show?

5 Q Correct.

6 A It was a completely new strategy?

7 Q He said -- I'll read you more of the quote, it's: Starting this morning, there's
8 a completely different strategy. The strategy is going to focus a great deal on some
9 evidence we have about some of these machines that did throw off these states. Over
10 the weekend, I think you'll see different strategies being employed than we were
11 employing before. I also think it's time for Republicans in those states to demonstrate.

12 And I left out certain words and sentences, but that's what he said. Do you know
13 anything about what he was talking about?

14 A No. I have no idea.

15 Q Do you remember there being a shift in strategy or focus in mid December
16 time frame?

17 A There wasn't for me, but I don't know.

18 Q Do you remember anybody being more focused on voting machines or the
19 need to get voting machines to do a forensic review or forensic audit of what had
20 happened in the election?

21 A That was Sidney Powell was focused on the machines. She was very vocal
22 about that. And Phil was doing work for both, both being Rudy and Sidney. And so it
23 sounds like there was some influence there. I don't know. No. Short answer, no. I
24 have no idea what that was.

25 Q So one of the last things I read is that Mr. Giuliani stated on this podcast, he

1 said, I also think it's time for Republicans in those states, dot, dot, dot, to demonstrate.

2 Do you know what he meant by encouraging Republicans to demonstrate?

3 A Well, I mean, no. You would have to ask him. I know what the word
4 demonstrate means, but no. You would have to ask him what he meant by it.

5 Q Okay. But just as you sit here, is there anything that from your experience
6 working with him that that means to you, any plan he wanted or effort that he sought?

7 A No. I -- I don't. I think the point was Republicans needed to, you know,
8 raise their voice and make their position known, but I don't think it was more than that,
9 but I don't know. You would have to ask him.

10 Q If we can go to Exhibit Number 18, please. So this document is titled,
11 Talking Points and Outline, Executive order 13848, imposing certain sanctions in the event
12 of foreign interference in the United States election.

13 A Um-hmm.

14 Q Have you -- I understand you only see the top part of this, but do you
15 recognize this document?

16 A No, I do not.

17 Q All right. If we can go down to the second half of this document, or the first
18 page here. It says, Republican leaders, call to action. Demand complete and total
19 transparency from the November 3rd election. Encourage the President to use his full
20 authorities under the National Emergency Act, and then a few others.

21 Do these look familiar at all to you?

22 A They don't. Did I produce this?

23 Q You did not produce this, Ms. Bobb.

24 A No, I don't. I don't recognize this.

25 Q One of the things I mentioned, understanding you don't recognize it, and

1 you can take it down, [REDACTED] but one of the things it mentions is the need or desire to
2 appoint a principal deputy attorney general and task force to investigate issues related to
3 the election.

4 I'm going to ask you specifically, do you know or ever heard the name Jeff Clark, a
5 DOJ official?

6 A No.

7 Q Do you remember any discussions about elevating someone within the
8 Department --

9 A Oh.

10 Q -- of Justice?

11 A Yeah, vaguely. Who was he?

12 Q His name is Jeff Clark. He was the head of the Environment and National
13 Resources Division. He's also over civil, DOJ civil.

14 A Vaguely. Now that you talk about it, I kind of sort of remember that, but
15 not specifically.

16 Q Okay. Tell me what you recall.

17 A I kind of -- I had forgotten about that. Who is -- who was above him?

18 Q So I'll tell you after Attorney General Barr resigned, it became Acting
19 Attorney General Jeff Rosen. And in the deputy attorney general spot, it was Rich
20 Donoghue.

21 A Okay. I remember that. I remember Rudy -- or I shouldn't say Rudy, like
22 all of us to some extent wanted some assistance from the Department of Justice, you
23 know, trying to figure out how to solve the problem -- how to solve what we saw as a
24 problem and not getting much support from within our own Department of Justice.

25 And I think -- I don't know. I mean, I don't know specifics, but I vaguely

1 remember somebody at the Department of Justice. I don't know. But I kind of sort of
2 remember what you are talking about, but I wasn't any -- like I was not in those
3 conversations but kind of. I kind of --

4 Q All right. I'm going to try to unpack this a little bit to see if anything shakes
5 loose in your memory about it. One of the people he was working with, Jeff Clark, who
6 was over the Civil Division at the time, he was working with a guy named Ken Klukowski
7 who had also worked with the campaign. He was a lawyer. And they drafted a letter
8 that was a proof of concept letter is how they defined it, but it was a letter to officials in
9 Georgia to call for a special session and to look into issues related to the election.

10 I can show you that letter to see if it looks familiar, but does that sound familiar?

11 A That doesn't. Sorry.

12 Q Okay. We understand that Mr. Clark, Jeff Clark at least knew or worked
13 with Representative Scott Perry.

14 Do you remember anybody at the Department of Justice having a connection to
15 Representative Perry?

16 A I do not from my experience. Doesn't mean it didn't happen. I'm not
17 trying to say it didn't happen. I just have no recollection of it.

18 Q Okay. If we pull up Exhibit 67, specifically page 2. So this is -- if you zoom
19 out just a bit so we can get a bit more context. This is a letter drafted to Governor
20 Kemp, speaker of the Georgia House, I assume, and the president pro tem of the Georgia
21 Senate, talking about the department investigating various issues related to the election,
22 and then calling for a special session, or recommending a special session after mentioning
23 issues related to the legislature's plenary authority in the Constitution.

24 A Okay.

25 Q Does this ring a bell, sound familiar to you?

1 A Not even a little bit.

2 Q Okay. You mentioned discussions about the need to have the Department
3 of Justice or desire to have the Department of Justice do more. How would you get
4 them to do more, I guess from your perspective and where you sat?

5 A We were looking for someone to talk to. Like that's what we were trying to
6 figure out and -- I don't know. Like I'm not aware of any specific requests from DOJ. It
7 was, you know, Rudy's doing one thing, and then it would make sense to have an
8 attorney general or some leadership at the Department of Justice involved. That's the
9 extent to my knowledge. I don't have any more information.

10 Q Do you know if anybody actually got an audience with the Department of
11 Justice? If Attorney General Barr or Rosen weren't doing enough, did they find
12 somebody that you are familiar with, or just that idea they found somebody?

13 A I have no idea.

14 Q Do you remember vaguely something about Jeff Clark and the Department
15 of Justice and needing them to do more; is that fair?

16 A Yeah. Something like that.

17 Q Is there anything else you can recall in that topic?

18 A No.

19 Q All right. And if you do as we proceed throughout here, please just let us
20 know.

21 [REDACTED] Any follow-up there?

22 [REDACTED]. Nothing for me.

23 [REDACTED] If we could go to Exhibit 19, please. If you go down to the bottom,
24 it starts with an email from December the 28th from Doug, slash, Debbie Mastriano.

25 Q BY [REDACTED]

1 Q Do you know who that is?

2 A Yeah. Doug Mastriano is the senator of Pennsylvania, state senator.

3 Q Did you have any contact with him when you were part of the legal team?

4 A I know Doug very well now. I don't know -- I do not think I had any contact
5 with him at the time.

6 Q Do you know if Katherine Friess was --

7 A Yeah.

8 Q -- in contact --

9 A Yeah. She was more connected to Pennsylvania than I was, so yeah.

10 Q Okay. And if we go up to the next email in the chain, she writes to Senator
11 Mastriano, Mr. Giuliani, Ms. Ellis and you saying, Thanks for the update; and then asks,
12 Any success with reaching out to friendly clerks to get ballot images and/or access to
13 Dominion systems. He responds, copying you, among others, saying, We are working on
14 an assessment of the irregularities on voting in Pennsylvania for POTUS. I'll cc each of
15 you.

16 Do you remember what this exchange was about?

17 A I don't specifically remember this, but it looks pretty straightforward to me.
18 They were trying to find voting irregularities in Pennsylvania, and he said that they were
19 working on it.

20 Q Do you know if Ms. Friess -- other than this -- excuse me. Let me start over.

21 Do you know if Ms. Friess made any effort, other than what's described here, to
22 get access to voting machines in Pennsylvania?

23 A I have no idea.

24 Q Do you know whether she or Senator Mastriano actually got data from
25 voting machines in Pennsylvania at any point?

1 A I don't know. I think Fulton County, Pennsylvania, not Georgia, I think they
2 did an audit. I don't know. No, I don't know.

3 Q All right. If we go to the next email, it's Exhibit Number 20. If you go
4 down to the first paragraph, it's from Senator Mastriano to Mr. Giuliani, Ms. Friess, Jenna
5 Ellis and you. It talks about Pennsylvania election data. This is dated December 28th.

6 And it says, No surprise, but our Pennsylvania Secretary of State is not responding
7 to inquiries from the Senate. Then it looks like later, a few minutes later says -- Senator
8 Mastriano says, We made good headway convincing two counties with Dominion
9 machines in Pennsylvania. We don't have subpoena power until January 5th, so the
10 counties are voluntary.

11 And then senator -- or, excuse me, Katherine Friess says, We are standing by to
12 assist. Appreciate it. Among other things.

13 A Yeah.

14 Q What else can you tell us, if anything, about the effort to get data from
15 voting machines in Pennsylvania?

16 A I didn't work Pennsylvania. I have no idea. I mean, I can read the email
17 and opine on what they meant, but I have no direct information about it.

18 Q Why were you copied on this, to the best of your knowledge, if you weren't
19 working Pennsylvania issues?

20 A Because I was working with Rudy. And I was doing a lot of work with Rudy.
21 Katherine was as well, but I think they just knew that I was working with them.

22 Q It sounds like though from what you said earlier you didn't have much
23 involvement on issues related to voting machines?

24 A Yeah.

25 Q So why, I guess the follow-on question is why copy you on a voting

1 machine-related issue?

2 A Because I am close with Rudy and I was physically, like physically close with
3 him, like I was often with him. And they probably just wanted to make sure that Rudy
4 got the information.

5 [REDACTED] Any follow-up there? Okay.

6 BY [REDACTED]

7 Q So I want to focus a little bit more on the state legislatures and your role
8 with respect to that.

9 A Okay.

10 Q There's a series of meetings or hearings in the various states: Arizona,
11 Pennsylvania, Michigan, in the late November to early December time period.

12 What was your understanding of the purpose of those meetings?

13 A To provide the state legislatures with the information that we had so far.

14 Q Do you know why they weren't official legislative action in all places? You
15 know some of them, for example, took place in a hotel room as opposed to the Capitol or
16 a committee room.

17 A So in Arizona I know Mark Fincham was running that. He's in the House of
18 Representatives. And Rusty Bowers did not want the meeting held on official grounds,
19 since the Speaker of the House would not allow it. Several of the legislatures still
20 wanted to see the information, so they did it off site. Michigan was on site. It was at
21 the Capitol.

22 And those were the two that I really worked on. I don't -- I don't know the other
23 ones.

24 Q What was your role? You said you worked on them. What did you do to
25 help with that?

1 A Like I told you about Finchem. I contacted Finchem. And through our
2 discussion, he decided to do it. And I said I'd connect him with Rudy so they could go
3 out there and do it. [REDACTED] so I was doing it all remotely. So it was all done via
4 email and telephone.

5 Same thing with Michigan. [REDACTED] I couldn't go. I couldn't physically do
6 anything with anybody, but I just coordinated as best I could from Washington, D.C., from
7 my home in Washington.

8 Q Did you make calls to Michigan lawmakers after the election in November?

9 A I probably tried. I don't remember successfully getting through to any of
10 them. I think I talked to their -- a couple staff members, but I don't remember
11 talking -- I don't remember specifically talking to any Michigan legislators.

12 Q What about Lee Chatfield or Mike Shirkey, I understand that they had
13 contact with the President and maybe Rudy Giuliani as well?

14 A Right. Definitely not Shirkey. Was Lee Chatfield the Speaker of the House
15 at the time?

16 Q I will represent to you that he was. Yes.

17 A Okay. I may have talked to Lee Chatfield.

18 Q All right. Tell us what you remember about that.

19 A Not much. I remember talking more to his staff. I couldn't remember the
20 name of who was the speaker at the time. It just, like, it was all totally logistic stuff. It
21 wasn't anything substantive. It was like what room is it going to be in, you know, what
22 time is at; where do the witnesses need to be; so I could get the information to the
23 witnesses to tell them when and where to be. That was it.

24 Q Did you help coordinate any calls between the President and members of
25 any state legislatures?

1 A I don't know. I have no -- I didn't even know the President at the time. I
2 couldn't do that. To the extent that I did, it would have been through Rudy, you know.
3 It would have been Rudy doing that.

4 Q Were you ever on the phone with Rudy when he spoke with any members of
5 state legislatures?

6 A Well, at that point I would think that that would be attorney work product,
7 wouldn't it?

8 Q Not if you are on the phone with the state legislator, unless that state
9 legislator is your client?

10 A Yes.

11 Q I'm sorry?

12 A Yes, I was.

13 Q Okay. And who do you remember speaking to?

14 A I didn't speak to anybody. Rudy was talking to Rusty Bowers.

15 Q All right. Tell me about that conversation.

16 A I just remember that Rusty -- there was Rusty Bowers and Karen Fann. And
17 I just remember wanting them -- Rudy -- I don't -- I don't remember specifics, but what I
18 think I remember was Rudy wanting to hold a hearing in Arizona, and Bowers was like I
19 can't, I can't, I can't, not allowed, so...

20 Q Was he resistant to the idea for a procedural reason or because of the
21 substance of what was expected?

22 A I can't remember today. I just remember him saying, I don't have
23 authority. I don't have authority. I can't, you know, that kind of thing.

24 Q And was Rudy upset about that?

25 A No. Rudy doesn't get upset. No. I mean, no, I don't -- I don't remember

1 any, you know, anything specific about it.

2 Q What about the call with Karen Fann?

3 A Same thing. That's why it ended up being in a hotel because they didn't
4 want to hold it.

5 Q But you don't recall specifics of the conversation between Mr. Giuliani and
6 Ms. Fann?

7 A I don't think it was -- it wasn't a very long conversation. Like it was like,
8 hey, we've got information we want to present, you know, if you give us a hearing type
9 thing; and they were like, oh, we can't. We can't. Nothing we can do. That's all I
10 remember about it.

11 Q Did you have any conversations with the representative Scott Perry in the
12 post-election period?

13 A Not -- no. I don't think so.

14 Q I'm going to show you Exhibit Number 22, please. These are text messages.
15 You did not provide this to us, but these are messages that Representative Perry
16 exchanged with Chief of Staff Mark Meadows.

17 A Okay.

18 Q And he says, Thanks for doing that. Talking with Rudy's folks in Philly, they
19 want the Pennsylvania legislative leaders invited ASAP for Sunday or Monday.

20 It sounds like you weren't involved too much in Pennsylvania, but do you
21 remember dealing with the Pennsylvania legislative leaders getting invited to the White
22 House?

23 A No. I didn't -- I didn't do that. I --

24 Q Do you know --

25 [crosstalk]

1 A -- at the time, but I didn't do it.

2 Q Do you know who did?

3 A Well, based on the emails that we looked at before, I would guess Katherine,
4 but I don't know.

5 Q Okay. Did you have any role in inviting legislators to the White House?

6 A No. I had no authority to get anybody to the White House.

7 Q Do you know why the President met with state legislators, what the purpose
8 of these meetings were?

9 A I wasn't there. I don't know.

10 Q Go to Exhibit 23, please. This a document that you did provide, Ms. Bobb.
11 And it's from Representative Finchem to you, Mark Martin, I'm not going to get this name
12 right, Leo --

13 A Can you scroll so I can see the top of it. It goes from me, up to -- okay.

14 Q So it starts with Representative Finchem, and then it goes to you and others.
15 It talks about as soon as Chief Justice Martin sends what he has, I'll send to you. And it's
16 about a legal theory analysis. You send it to an email address.

17 Do you recognize the email address you sent it to there?

18 A Yeah. That's Mirna, Mirna Tarraf. I think that's how you spell her last
19 name. She works the campaign. She was like an admin clerk for the campaign.

20 Q And then you send the same thing to Mr. Giuliani and Mr. Epshteyn. And if
21 we go to the next page, you can see what you were forwarding on. It's called, A legal
22 theory brief addressing uncertifiable elections, and a memo that apparently Mr. Finchem
23 wrote.

24 Do you remember this?

25 A Vaguely.

1 Q What do you remember about it?

2 A That he sent it me and then I forwarded it on.

3 Q Is this something -- is it your understanding that Representative Fincham
4 wrote this?

5 A I think so. I don't know. But based on the email and the fact that he's got
6 his name on the top of it, yeah.

7 Q Did he send this to you because it's something that you had requested from
8 him?

9 A I did not request this from him. No.

10 Q Do you know why he sent it to you? Did he ever explain it?

11 A I don't remember, but I would guess that it was something that he had been
12 thinking about and wanted to share his thoughts, so he did.

13 Q And he first sent it to you on November 21, which is roughly a week or so
14 after you started. Does that sound right?

15 Did you know who Mark Martin is?

16 A No.

17 Q Did you ever learn who that was?

18 A Probably. Can you remind me?

19 Q Yeah. Mark Martin, he was -- at least the Mark Martin I'm thinking of is a
20 former chief justice of the North Carolina Supreme Court, but I'll represent to you that on
21 this email it just says Chief Justice Martin.

22 A Okay.

23 Q And it goes to somebody named M. Martin.

24 A Okay.

25 Q Did you ever work with him as when you were part of the legal team?

1 A No. I should say I don't remember. His name wasn't familiar. I don't
2 think I worked with him.

3 Q On page 2 of this -- well, it says under the plenary authority, retained by
4 legislatures and the Constitution of the U.S., the legislature may indeed call itself into
5 special session without interference from the executive branch and/or judicial branch.
6 Moreover, the legislature has the duty to step in and to either call for a new election or
7 refuse to certify and release the electors to either candidate for President, and even to
8 nullify other office elections that may have been affected by various frauds shown by
9 evidence and testimony so -- to have been so committed.

10 This hits a little bit on the issue we talked about earlier, I think, but do you
11 remember having discussions about this idea with Representative Fincham?

12 A Not really. Sorry, I can't see what you were reading. Can you read it one
13 more time?

14 Q Sure. It is -- I'll just read for you the relevant parts as: Moreover, the
15 legislature has the duty to step in and to either call for a new election or refuse to certify
16 and release the electors to either candidate for President. And it goes on, assuming you
17 can prove fraud. And it's in the -- if you go to page 3, right in there, it's --

18 A Right. Sorry.

19 Q Where it says "moreover" in that middle, in the middle there.

20 A Yeah. I don't know. We didn't specifically talk about this brief.

21 Q Okay. And even if you didn't talk about this brief, what about the idea that
22 the state legislature could refuse to certify and release electors to either candidate for
23 President; did you talk about that?

24 A Maybe. I don't have a specific recollection of that, but it could have been
25 in the mix.

1 Q Okay. I'll show you something else to see if this helps refresh your
2 memory, Exhibit Number 24. This is also a document you produced, an exchange
3 between you and Representative Fincham that you then sent to Mr. Giuliani and Boris
4 Epshteyn. And it's a memo from Justice Martin and Phil Olson.

5 A Okay.

6 Q This is called: The Constitutional Duty of State Legislatures in a Contested
7 Presidential Election.

8 Do you know why Representative Fincham sent to this you?

9 A No.

10 Q Do you know who William Olson is?

11 A No.

12 Q Do you know who Floyd Brown is, the person at the very beginning of this
13 email exchange?

14 A No. Am I supposed to know who these people are?

15 Q You tell me. I don't know. That's why we are asking.

16 [crosstalk]

17 A -- I don't know who these people are, and you are like they have been your
18 best friends since high school, and I'm like, oh, shoot, I forgot. No. I don't have any
19 recollection of who they are.

20 Q So in the cover email, Representative Fincham says that you can now release
21 this memo.

22 Were you expecting a memo to be able to release to the public or other people
23 about state legislatures and their role with respect to electors?

24 A I wasn't, and I didn't, like I didn't publish this anywhere. I just -- I think I
25 just forwarded it on, just so everyone received it, but no.

1 Q Did Mr. Giuliani -- was he expecting these memos from Representative
2 Finchem?

3 A No. No. Not to my knowledge.

4 Q If you go to Exhibit Number 25, please. And this is not an email that you
5 are on or that you provided to us.

6 A Okay.

7 Q It's from Jenna Ellis to Molly Michael and Mark Meadows. And it says, For
8 POTUS. And then it attaches a memo prepared by John Eastman, called the
9 Constitutional Authority of State Legislatures to Choose Electors.

10 A Okay.

11 Q Have you ever seen this memo before, this John Eastman memo?

12 A Probably. I don't remember specifically, but...

13 Q And did you ever talk to Jenna Ellis about this memo?

14 A No.

15 Q Jenna sends this -- excuse me, Ms. Ellis sends to Molly Michael and Mark
16 Meadows. Do you know who Molly Michael is?

17 A Yes. She's the President's executive assistant.

18 Q Did you have any interactions or communications with her in the
19 post-election period?

20 A Not to my recollection.

21 Q And Mark Meadows, do you know who he is?

22 A I do.

23 Q Did you have any interactions with him in the post-election period?

24 A I -- sorry. My phone is ringing. Okay. Yeah, one. One that I remember
25 was the phone call, the Brad Raffensperger phone call. I was in Meadow's office with

1 Rudy, I think Katherine was there. There may have been one other person there, but we
2 listened in on the call from Meadows' office.

3 Q Had you met him before that?

4 A No. I don't think so.

5 Q Do you remember -- go ahead. I'm sorry.

6 A No. I don't think -- I think that was the first time I met him.

7 Q Do you remember talking to him before that, even if not in person?

8 A No. I never did.

9 Q When you gathered for that call, what was his expectations for the call?

10 What was the purpose of that call?

11 A I think to listen and, you know, be available as needed, but I think the whole
12 point was just to listen.

13 Q Did he say anything about what the President was or was not going to
14 request or seek by this call?

15 A No.

16 Q Do you remember if Mr. Meadows expressed any concerns about having this
17 call?

18 A No. I don't think he did, but I don't remember, but I don't remember him
19 expressing any concerns.

20 Q Were you able to hear the call that the President had with Secretary
21 Raffensperger?

22 A Yes.

23 Q What happened afterwards, when you were sitting there and, you know, the
24 phone is hung up now?

25 A Nothing. We chit-chatted and left. It was -- it was an unremarkable call.

1 I know the media has sensationalized it, but none of us thought anything of it. It was
2 just a call and that was it.

3 Q I mean, the President of the United States asked the Secretary of State to
4 find enough folks to ensure his victory in Georgia. I mean, he used those words, I'm just
5 asking you to find votes.

6 A That is a gross misrepresentation of the phone call. It was a perfectly fine
7 phone call. If you look at the transcript, he was not asking anything improper. He
8 wasn't asking him to do anything illegal.

9 There was a lot of indicators of fraud. That's what he was talking about. He
10 was not -- nobody in the room thought there was anything wrong with the phone call. I
11 think it was perfectly fine.

12 Q So I understand your perspective, but I did want to ask you that, what you
13 just got to is that after the call, did anybody express any concern, reservation, have any
14 thoughts about what had just happened in that call?

15 A No. But there were a lot of people on the call. Like there were probably
16 at least two dozen, like there was, you know, half a dozen of us in the room, but then
17 there were other -- there were a lot of other people on the call.

18 We knew somebody was going to record it. We knew somebody was going to
19 release it. We knew the media was going to twist it, which was exactly what happened,
20 but nobody was concerned about it. Our concern was, was it a legitimate phone call
21 and did the President say anything improper. And at the end of the call, we all thought
22 no. Like it was totally fine. There was nothing wrong with it. So we didn't think
23 anything of it, and we chit-chatted and left.

24 Q What about the call in advance made you think that it was going to be
25 recorded and leaked?

1 A Because Donald Trump was on the phone. Because Donald Trump was on
2 the phone and there were other parties allowed on the phone. Of course somebody is
3 going to record it.

4 Q You said there were about a half a dozen people with you. Who was with
5 you in that room?

6 A Meadows, Rudy, me, Katherine, those are the ones that I specifically
7 remember. There may have been one or two others, but that was it.

8 Q Do you know where the President was?

9 A No. He was not there.

10 Q He was not in Mr. Meadows' office?

11 A No. We were not physically with him.

12 Q Okay. So getting back to the exhibit that prompted this conversation, Ms.
13 Ellis sent John Eastman's memo, early memo to Ms. Michael and Mr. Meadows.

14 Do you have any information about whether they were expecting or requested a
15 memo from John Eastman at this point, which is November 28?

16 A No. I have no idea.

17 Q Do you remember any discussions or do you have any information about
18 engaging Mr. Eastman to write a memo about the authority that state legislatures had
19 with respect to electors?

20 A I do not.

21 Q Do you know whether the President ever got this memo?

22 A I don't know. I imagine. I mean, it was sent to Molly and Meadows. I'm
23 sure one of them gave it to him, but I don't actually know.

24 Q And generally was it your understanding that if you sent something to -- or
25 somebody sent something to Ms. Michael for the President, that that's how you would

1 get something to the President?

2 A No. If it was requested. Sorry. Let me categorize that. If they
3 requested this memo. I thought that was the premise. If this was a memo that was
4 requested, you know, that's how you would get it to him, but I have no idea if they
5 requested it. And I have no idea if they gave it to him.

6 Q I see. Okay. If we go to Exhibit 26, please. This is from Sonny Joy
7 Nelson to a few people including looks to be a mailing list of Trump team surrogates
8 about a surrogate call on December the 1st.

9 Q Do you know who Sonny Joy Nelson is?

10 A She was a scheduler for the campaign.

11 Q And this talks about Jenna Ellis and Jason Miller being on this call in some of
12 the bullet points.

13 A Yeah.

14 Q It says, our legal and recount efforts are proceeding on two separate tracks.
15 Then the next black bullet point down says judicial track, mentions a few lawsuits. And
16 then it goes down to nearly the bottom of the page, and keep going, right there, that
17 black circular bullet point says state legislature track.

18 Is that your understanding of generally the tracks that are -- that were challenging
19 some of the results in the election at that point, both the judicial and state legislature
20 track?

21 A Yeah. I don't know how else you would do it. Yeah.

22 Q Do you know who prepared these talking points?

23 A No idea. I've never seen this before.

24 Q And just above that state legislature there's a black square bullet point says,
25 these elections have been irredeemably compromised and the matter should go to the

1 state legislatures.

2 Having worked where you worked, and did what you did, what was your
3 understanding of what this says, that the election should go to the state legislatures?

4 A I don't know. I don't know who wrote this. Based on the fact that it's
5 coming from Jenna Ellis and Jason Miller makes me think that these are like media talking
6 points, but I have no idea.

7 Q And this talks about the state legislature track or strategy. Do you know
8 who came up with the state legislature track as a focus for the campaign in the
9 post-election period?

10 A No. I mean, like I said, I just called Mark Finchem. I don't know.

11 Q And forgive me if I asked you this before, but was that one of your
12 assignments, like reach out to state legislatures when you get here, hit the ground
13 running by doing that?

14 A No, it wasn't. That's why I'm saying, like, talking points make it look nice
15 and organized and all that, and that's great, but like we were all just trying to do what we
16 could to figure stuff out. So I don't know.

17 Q With the hearings that occurred in the state legislatures that we talked
18 about little bit --

19 A Yeah.

20 Q -- were one of the purposes to get the state legislatures not only to
21 understand what you and the legal team thought was out there, but also to take some
22 action with respect to electors or otherwise?

23 A I don't -- I don't know. We did not have time to come up with, like, a fully
24 developed strategy. We are talking about days. Like none of us expected what we
25 saw. And so this was not like a let's, you know, let's have a strategizing session and sit

1 around and talk about it. This was everyone just trying to do what they could to get
2 everything.

3 I don't think that there was a specific, like, hey, if we get the legislators to do this
4 then, you know. It wasn't that way.

5 Q Do you know why Mr. Giuliani was -- made a decision or just wasn't sworn in
6 at these hearings?

7 A No. I don't know.

8 Q Did you hear that the legislature or a legislator tried to swear him in but it
9 ultimately didn't happen and he testified without being sworn in?

10 A No. But usually attorneys aren't sworn in. So why would he be sworn in.

11 Q Well, I think they tried to swear him in because he was the one presenting
12 evidence as a witness. But you don't know anything about why he was not sworn in?

13 A No. I don't know anything about it but, I mean, attorneys present evidence
14 in court all the time and they are not sworn in.

15 Q At the November 25th hearing, which I believe was in Pennsylvania, Mr.
16 Giuliani said, among other things, that Pennsylvania had received more mail-in votes than
17 it had sent to voters, meaning more mail-in votes than mail-in ballots.

18 A Yeah.

19 Q Do you remember that?

20 A I remember that fact. I believe that fact is true. I don't specifically
21 remember him saying that.

22 Q I understand that you weren't necessarily working in Pennsylvania. I think
23 it's since been determined that Mr. Giuliani confused the number of ballots sent in the
24 primary and the general elections.

25 Do you remember any discussions about walking that back or correcting the

1 record that Mr. Giuliani --

2 A No.

3 Q -- made in Pennsylvania?

4 A No. There were more votes than voters in Pennsylvania. Like several
5 groups have looked into that. And that is -- as we sit here today, I believe that's a true
6 fact. So I don't think he would have had to walk anything back.

7 Q Okay. And this is specifically what I was talking about was mail-in votes and
8 mail-in ballots and comparing those two, but --

9 A I don't know the specifics of what you are saying, but okay.

10 Q So also around this time -- well, let me just pause to see if anybody has any
11 questions.

12 [REDACTED] Nothing for me.

13 BY [REDACTED]

14 Q On December 14, a number of Trump electors met and cast Electoral College
15 votes for President Trump, despite the fact that the state had certified those votes for
16 President Biden. I'm going to refer this as kind of the alternate elector strategy, but
17 does that make sense to you? Do you know what I'm talking about?

18 A Yeah. It was the same thing that they did I think in Hawaii in 1960.
19 Because the law requires the electors to meet on December 14th or whatever day you
20 say it was, there was still -- they were still challenging -- there were still two or three
21 weeks or whatever to challenge the results.

22 So in order to be as compliant with the law as possible, you would have had to
23 have your ultimate slate of electors meet on that day. They were open. They didn't do
24 anything fraudulently about it. They signed their own names. It's not like they made
25 something up.

1 They did what they were purporting to do. Yeah, I know that. And I think it
2 happened in a couple different places.

3 Q Okay. You mentioned a 1960 example. Is that something you researched
4 before --

5 A I didn't research. No, I did not research it.

6 Q Okay. Is that something you have ever researched since then?

7 A No, which at this moment I wish I knew more about it, because I could sound
8 better, but no. I know it was something that happened and they were replicating that.
9 That's all.

10 Q Okay. And when did you first hear about this idea of having the Trump
11 electors meet, even though the state was not called for the President, President Trump?

12 A Shortly before, probably a day or two before.

13 Q Had you heard about it earlier, like in November when you joined the legal
14 team?

15 A No.

16 Q Do you remember where you heard it from or from whom?

17 A No.

18 Q Earlier we asked you about somebody named Ken Chesebro.

19 A Yeah.

20 Q And just remind me, were you familiar with him with respect to this idea of
21 having Trump electors meet and cast votes in states that he had not won?

22 A I was not familiar with him. No. He could have, like he could have been
23 the one -- I have no idea. Like I don't know who he was or what role he played.

24 Q Did you work with anyone in the White House to implement this, I'll call it a
25 strategy, but have the Trump electors meet and cast votes?

1 A No. I didn't work with anybody in the White House I think on anything.
2 Oh, no, Peter Navarro, we shared information but, no, that was it. I didn't work with
3 any --

4 Q Go ahead. I'm sorry. I cut you off.

5 A No. I didn't work with anybody else. No.

6 Q Do you know if anybody on the legal team worked with folks in the White
7 House on this issue?

8 A I don't think anybody did, but I don't know.

9 Q What about the RNC, did you or anybody on the legal team work with folks
10 at the RNC to make this happen, get the Trump electors together and cast their votes?

11 A So, because I wasn't part of the RNC or the campaign, I don't necessarily
12 know who was who, but I think I worked with people from the campaign to do this. I
13 don't know who's RNC and, you know, who's not.

14 Q And what was your role and who did you work with then?

15 A I didn't really have a role. I knew it was happening, and I think they -- I
16 didn't do really anything on it. I think I maybe -- what did I do with it. I was on call, I
17 think. I don't know. I think I was available if anyone needed information or
18 something, but I didn't actually do anything on it.

19 Q Did you help coordinate meeting sites or groups of people to get together at
20 all?

21 A I don't think so. I mean, like I said, for Arizona, Michigan, and New Mexico I
22 would have been the point of contact. So if any of them, like the people in those states
23 had questions, they might have reached out to me, but I don't specifically remember like
24 coordinating this.

25 I remember being on the call. I remember being aware of it happening, but like I

1 couldn't have coordinated the sites because I wasn't there. Like I was in Washington,
2 D.C. So I wouldn't have known where to tell them to go or anything.

3 So I wasn't coordinating the logistics from that end, but I probably was a point of
4 contact if anybody had questions for like Rudy's team, but I don't think -- I don't think
5 anyone contacted me on that. I don't know. I don't remember doing anything specific
6 about this, but I was aware of it and I knew it was happening.

7 Q Without getting into the legal research or conclusions, if any, did you do any
8 legal research related to this issue of having the Trump electors cast votes?

9 A No.

10 Q So I do want to get to that call. Tell us about the call you remember being
11 on related to this issue.

12 A I don't remember. I think it was Arizona and possibly New Mexico, and I
13 couldn't tell you -- I'm sure there's a calendar invite somewhere, you guys might have it,
14 with the names of the attendants. So I do not remember who was on the call, but I
15 listened and it was coordinating people, telling them where to go and what they were
16 going to do and whether -- I think it was one of the states they were trying to coordinate
17 was like the Speaker of the House to say, hey, let them know this is what we are doing.
18 And they didn't want them there, so they decided to meet outside because they were
19 trying to be respectful of the process because they wanted to follow the law as closely as
20 they could, so that type of stuff.

21 And they decided the easiest way to follow the law, and they all came up with the
22 logistics of the when and where, which I couldn't tell you what it is because I'm not from
23 those places. Yeah. That was it.

24 Q There was -- I'm familiar with at least two calls that occurred on it was a
25 Saturday, December 12th, so about two days before the Electoral College met and cast

1 votes. Does that sound familiar? Do you think this was a Saturday call potentially?
2 A It might have been. I don't know. Every day felt -- morning, so I don't
3 know.

4 Q And do you remember Mr. Giuliani being on that call?

5 A He was not on the call.

6 Q Who was on the call from the legal team?

7 A I don't know. That's why I was saying hopefully you have a calendar invite
8 that somebody produced, because whoever was on that, like I was on probably -- I was
9 probably Rudy's representative, but...

10 Q And you said earlier that you didn't know because of the breakdown and
11 where things were, whether somebody was campaign or RNC, but you remember
12 working with somebody on this. Who was it that you remember working with, and what
13 was their role?

14 A I think -- I think Mike Roman may have been part of it, but I don't know.
15 That's why like do you have -- if you have a calendar invite with the organizer, that would
16 be helpful to know, but I don't -- I don't know names or anything. They were people
17 that I hadn't really worked with before. I didn't know them.

18 Q Talk to me about Mike Roman. What do you remember him doing, if
19 anything, with respect to these electors meeting and casting votes?

20 A I think he just coordinated -- because he was like I want to say operations
21 coordinator I think for the RNC, maybe for his campaign. I don't know. And I think he
22 was just coordinating the GOP, like the state GOPs. I don't know.

23 I think he was just the one that had the contact information for everybody, but
24 like it had to be people on the ground coordinating it because we are not there, you
25 know, but I don't know.

1 Q So some of the alternate electors declined to participate or decided not to
2 participate in the process. Are you familiar with any of the electors who decided not to
3 do this?

4 A I don't know who they were, but I know some of them didn't do it.

5 Q Did anybody reach out to you to talk to you about concerns they had about
6 this process?

7 A No.

8 Q Were there any discussions that you were familiar with about revising
9 language in the electoral certificates to make them more conditional, like dependent on
10 the state legislature deciding to do something or courts deciding to do something?

11 A I have never heard that. That's the first time I've heard that.

12 Q Do you know if John Eastman had any role in coordinating the alternate
13 electors?

14 A To my knowledge, he did not, but I don't know. I -- I was very limited
15 involved myself, so who knows. Maybe he had a really big role and I didn't see it, but I
16 don't -- I don't think he was part of it.

17 Q Do you know if the President was aware or involved in the alternate elector
18 plan?

19 A No idea.

20 Q You don't know, just to be clear?

21 A I don't know. I believe he was not, but I don't know.

22 Q You never discussed this with him?

23 A No.

24 Q All right. We can go to Exhibit 29, please. This is a document from -- it's a
25 memo, rather, from Ken Chesebro to Judge James Troupis.

1 Do you know who James Troupis is?

2 A Yes.

3 Q Who is that?

4 A He's a well-respected attorney in Wisconsin.

5 Q Did you work with him at all or communicate with him at all after the
6 election in November?

7 A No. Not in this time frame. I have since, but not in this time frame.

8 Q Have you ever seen this memo before by Ken Chesebro to Judge Troupis
9 about the deadline for setting a state electoral votes and having alternate electors cast
10 votes for Donald Trump?

11 A I don't think so. It doesn't look familiar. Maybe. I don't know. I don't
12 remember seeing this. It's possible.

13 Q You say maybe. Do you remember seeing any memo justifying or talking
14 about the legal basis for alternate electors meeting?

15 A No. I don't remember any memo. I mean, I know people were talking
16 about it, but -- it's possible I got this, but I don't specifically remember. Did I produce
17 this?

18 Q You did not produce this. You said you remember people talking about it.

19 Who are the people that you remember talking about this idea of alternate electors?

20 A I mean, this was -- this was the new cycle, right? Like what's the safe
21 harbor deadline. What's the law say that electors have to vote, you know, like when's
22 the -- like all of this was the discussion at the time. I remember that, but I don't have a
23 specific recollection of this, but it is possible I saw it.

24 Q If we go to Exhibit 30, this is another memo, different memo from Ken
25 Chesebro to Judge Troupis. This one is dated December the 9th, talking about statutory

1 requirements for the alternate electors. And then if you go to page 3 of this exhibit, it
2 talks about various state law statutory requirements.

3 A Okay.

4 Q It goes through Arizona. In the third paragraph in that, Arizona says, one
5 concern is that if one or more electors are absent from the meeting, is there a procedure
6 under Arizona law for filling vacancies. And then if you look at some of the others, in
7 Michigan it talks about various issues there and in Nevada.

8 Do you remember anybody raising any concerns about being able to follow state
9 laws with these alternate electors meeting and casting votes for Trump?

10 A Yeah. I mean, that was whole point of it. Everyone wanted to make sure
11 that they were following the state law, because if we were able to success -- you know,
12 have some type of successful procedure before January 6, we needed to have followed
13 the law. So the whole point of the effort was to make sure that we were following the
14 law.

15 Q And in Nevada, I know you said earlier that you did some work in Nevada,
16 but in this memo, if you go to page 4, under paragraph D right there it says, Nevada is an
17 extremely problematic state because it requires the meeting of the electors to be
18 overseen by the secretary of state, who is supposed to -- who is only supposed to permit
19 electoral votes from the winner of the popular vote in Nevada because of faithless
20 electors issue.

21 So do you remember this coming up in Nevada? I mean, that Ken Chesebro is
22 writing this memo about complying with state law, says that it's extremely problematic to
23 do this in Nevada?

24 A I don't know anything about this.

25 Q And I know you said earlier that there was a focus on wanting to do this in

1 compliance with the law, but just to be clear, do you remember any concerns that people
2 raised about not being able to follow the law at all and what to do then?

3 A No. The understanding is that we were following the law. And that's why
4 they had reached out to -- it's my understanding they had reached out to like either the
5 local speakers of the House, whatever, to coordinate with them. And to the extent that
6 they wouldn't allow them or whatever, they -- I think they did something else. I don't
7 know.

8 They get as close as they could to compliance that --nobody was like, hey, let's go
9 break the law. That didn't happen.

10 Q So your understanding though, and based on what you saw, what you heard
11 is that people did think they were complying with the laws in casting these alternate
12 electoral votes?

13 A Yeah. That was the whole point. Because if they didn't cast them on this
14 day, or whatever day it was, then they wouldn't have been able to do it, you know, a
15 week or two later. If we had a successful court ruling or something come up, we would
16 have been out of compliance with the law, which is why they wanted to do it this way.

17 Q So then are you surprised then to see this, to see a memo saying that, you
18 know, like Nevada can't follow the law unless the secretary of state is there to watch the
19 votes being cast?

20 A No.

21 Q Which didn't happen?

22 A I understand why you are reading it that way, but quite honestly I think
23 you're reading into it what you might want to read into it. When I read this, I see it's
24 problematic because we have to get the secretary of state to oversee what we are doing,
25 and the secretary of state is a raging liberal who is not going to do it, so we will be

1 unsuccessful.

2 That's the way I read this memo. I don't read it as it's problematic; we are going
3 to have to break the law to do this in Nevada. That's not the way I read this, and I don't
4 think that's the way the intent of it, but I don't know. You'll have to ask whoever wrote
5 this.

6 Q And until today, you had never seen this memo though, right?

7 A Correct.

8 Q Okay. And until today, do you remember discussing this memo or the
9 specifics of this memo like what you just mentioned with anybody on the campaign or
10 outside the campaign, the electors themselves?

11 A No. The only thing I know about this memo is what you just showed me.
12 And I can tell you whoever wrote this memo, the way I read it, it's not problematic in the
13 sense that we are going to break the law. It's problematic because we won't be
14 successful.

15 Q Okay. Understand your reading there. If we go to Exhibit Number 31, if
16 you go down to the email there that we are getting half of, yeah, right there.
17 Mr. Chesebro on December 10 sent an email to various folks in the Nevada Republican
18 party including Michael McDonald and Jim DeGraffenreid.

19 Do you know who those people are?

20 A I know Michael McDonald.

21 Q Did you ever talk to him about the alternate electors and casting votes for
22 Trump in Nevada?

23 A No.

24 Q So, in this email Mr. Chesebro says that Mayor Giuliani and others with the
25 campaign, including Justin Clark and Mick Trainer, asked me to reach out to you and other

1 electors to run point on the plan to have the Trump-Pence electors in all six contested
2 states meet and transmit their votes.

3 Do you -- are you familiar with Mr. Giuliani's directive to have Ken Chesebro reach
4 out to the electors in the six states like it says here?

5 A I'm not familiar with it. I know it happened. I know the electors met.
6 So somebody coordinated it, but no, I don't know.

7 Q You can take that down. Thank you.

8 I think you mentioned this before, but what was your understanding of the reason
9 for doing this?

10 A I told you, because they wanted to be in compliance with the law in the
11 event that we either had a successful court ruling or some other event came up to legally
12 question the results of the election. We were trying to be in compliance, as close to
13 compliance with the law as we could.

14 In order to do that, we have to have your electors meet on December 14th or
15 whatever day it was. So it was an attempt to be in compliance so that we could
16 preserve a remedy for a favorable court ruling.

17 Q And you mentioned court -- a favorable court ruling or some other event.
18 What other event could trigger these being effective?

19 A I have no idea. Anything that would have called the election into question.
20 I mean, it was a novel issue that we were raising to try to solve, like it's nice that you now
21 had two years to sit and think about this, but at the time we are putting out a fire. I
22 don't know.

23 We didn't know then, and I don't know. But the whole point is the obvious one
24 is that we had a favorable court ruling. Could something else have happened, I don't
25 know, maybe, possibly. That was the whole point. It was a novel issue. We didn't

1 know what was going to happen.

2 So in order to preserve the ability to have another slate of electors to use, they
3 would have had to meet at this time.

4 Q What about state legislators, could they do something that would make
5 these alternate votes somehow effective as you understood it at the time?

6 A I have no idea. Yeah, why not. State legislators can pass a resolution if
7 they want to. It's never happened. It's a novel issue, as I've said four or five times
8 now.

9 All of this is novel, so I can't sit here and tell you precedent or tell you statutory
10 rules. I don't know. But I also think -- I think people were looking for solutions at this
11 time. And in order to keep all of the doors open, they were trying to comply with the
12 law.

13 Q Are you aware of any discussions about the need to do this, meaning have
14 alternate electors cast votes for then President Trump in order for Mike Pence to have
15 some ability or authority to take action on January 6th in the joint session of Congress?

16 A I think there's separate issues. But, no, I don't -- I don't think the -- the
17 whole alternate slate of electors things was preserving remedies. So, for example, we
18 had a favorable court ruling. Somehow something -- somebody ruled that, you know,
19 the Biden electors would get pulled back. You have to have -- the remedy would be to
20 then award Trump electors. But if you don't have a slate of Trump electors, there's
21 nothing for the court to award. So you have to preserve the remedy.

22 So the whole point of this exercise was to preserve the remedy, whether it was
23 through the court, whether it was through legislature, I don't know. But it was -- it had
24 nothing to do with Pence taking any action. It was just preserving a remedy in the case
25 that we could somehow use another slate of electors in some fashion, but we had to -- it

1 had to exist.

2 Q Do you remember any discussions about Congress being able to do
3 something with these alternate slate of electors during the joint session, if a court or a
4 state legislature didn't do anything?

5 A No. I don't think so. I don't think that they went to Congress. I think
6 they -- I don't think they were submitted to Congress, were they?

7 Q I will represent to you that they were. They were sent to Congress and the
8 Vice President as president of the Senate.

9 A Oh, I don't know about that, so I have no idea.

10 Q Okay. So you weren't familiar that these --

11 A No.

12 Q -- went to Congress at all?

13 A I didn't even know they went. I thought they were held and reserved, but I
14 didn't know they went.

15 Q Okay. Then I assume I know the answer to the next question, but I don't
16 want to assume. So you didn't have any role in telling alternate electors to send their
17 votes to Congress or the National Archives or the President?

18 A I did not know that. No.

19 [REDACTED] I just want to make sure I understand what you were
20 understanding at the time. So say in the event that, you know, it's January 6th. A
21 court has not ruled on the question of which slate of electors is the valid slate of electors.
22 A state legislature hasn't taken any action to find out Trump's slate of electors.

23 Is there any valid way for those other slates of electors to have been considered or
24 used or certified or anything if one of those two things had not happened?

25 Ms. Bobb. Not to my knowledge.

1 [REDACTED] Okay.

2 BY [REDACTED]

3 Q So at some point mixed in, not necessarily in order chronologically, but
4 mixed in in there were efforts or calls to have states decertify the certified results of their
5 elections.

6 Are you aware of those efforts?

7 A Not at the time frame we are talking about. I mean, I am aware of them -- I
8 thought that became a thing at the Arizona audit, which was months later. I'm not
9 aware of that happening in the time frame you are talking about.

10 Q Okay. And the time frame, just to be clear for the record, between the
11 election day, November 3, through January 6, 2021?

12 A Correct.

13 Q Earlier we talked a little bit about members of Congress. I do want to get
14 into that a little bit more. Do you remember or recall a December 21st meeting in which
15 President Trump and Vice President Pence met with members of Congress to discuss
16 January 6 in the joint session of Congress?

17 A Nope. I would have had no knowledge about that.

18 Q Okay. Do you remember any meetings that you were in or heard about
19 involving members of the House Freedom Caucus or any other member of Congress for
20 that matter related to January 6 and the joint session of Congress?

21 A No. I don't know anything about it.

22 Q Pull up Exhibit 34, please. We've been going for about an hour and a half.
23 If you want to take a quick comfort break too, just let us know. We are happy to do so.

24 A I'll want to take a break in a little bit, but as much as I'm enjoying this, I
25 would really just like to get it over with.

1 Q Understood. Just let us know?

2 A Okay.

3 Q This is Exhibit Number 34. This is a text message that Representative Hice
4 sent to Mark Meadows on December 22 following apparently a meeting on the 21st.
5 Representative Hice says, Three quick things: Thanks for making the meeting happen
6 yesterday. I thought it was productive. When Rudy says he needs one more thing
7 from Georgia, what does he mean. I'm reaching out to Georgia folks for help, but need
8 more specifics. Who can I contact on Rudy's team.

9 [REDACTED] And you can take that down now.

10 BY [REDACTED]

11 Q Do you know or did you ever have any communications with Representative
12 Hice?

13 A Not at that time. I have interviewed him as a journalist like April, May,
14 June, time frame, but no, I did not know him at the time.

15 Q And at that period, so December 22 was the message, but around that time
16 do you know if Mr. Giuliani had any desires, what the one more thing he wanted to get
17 out of Georgia was?

18 A No idea.

19 Q Another person who has mentioned meetings with Mr. Giuliani includes
20 then Representative Elect Marjorie Taylor Greene.

21 Did you have any interactions with her or her staff related to the election?

22 A Never.

23 Q All right. If you can pull up Exhibit Number 36. This is not a document
24 that you provided to us.

25 A Okay.

1 Q We obtained it from the National Archives, but this is from Bernie Kerik to
2 Mark Meadows, chief of staff. The subject is: Giuliani team strategic communications
3 plan V1, and with the attachment, the same thing. In it, Mr. Kerik says, Dear Mark, I
4 know the mayor sent this to you last evening, but wanted to emphasize the importance
5 of timing. We need to pull the trigger today. We are estimating it's going to run
6 between five to eight million and will bring in Mike Glassner and Mark Serrano to put it
7 under the mayor's supervision.

8 And I'm ad libbing a bit here, summarizing. Said there's only one thing that's
9 going to move the needle and force the legislators to do what they are constitutionally
10 obligated to do, and that is apply pressure, specific pressure in targeted areas. This plan
11 does that. And says we can do all the investigations we want later, but if the President
12 plans on winning, it's the legislators that have to be moved.

13 And then if you look at the attachment which is Exhibit Number 37, it's something
14 called The Strategic Communications Plan, Giuliani Presidential Legal Defense Team.
15 We have 10 days to execute this plan and certify President Trump.

16 Do you recognize this strategic communications plan?

17 A Yes and no. I remember -- I don't remember it coming from Bernie. I
18 remember Katherine working on something, but I -- I wasn't a part of it, and I don't think I
19 saw it. I feel like I have seen this cover page thing that we are looking at but, yeah, I
20 don't know. I don't know anything about it.

21 Q Okay. And we'll go through some of it, but you don't remember working
22 with Ms. Friess on creating this document?

23 A No. I definitely didn't. I did not work with her on this.

24 Q We can go back to Exhibit 36 which is the cover email for this. Mr. Kerik is
25 writing this on December the 28th and saying there's only one thing that's going to move

1 the needle and force legislators to do what they are constitutionally obligated to do, and
2 that's apply pressure.

3 So can you tell us just the sense of what was happening around that time with the
4 legal team and getting to the point that Mr. Kerik mentions, which is if the President plans
5 on winning, then we need to move the legislators?

6 A I have -- I have no idea. You'll have to ask him.

7 Q Do you remember any conversations about the need to apply pressure to
8 specific people or groups of people at that time?

9 A No. No.

10 Q And if we go back to 37, which is the attachment, the timeline for this is
11 December 27 through January 6, which corresponds with the joint session on January 6.

12 Do you recall there being a focus on January 6 after the electors had met and cast
13 votes and President Biden was declared the President Elect at that point, I mean, was
14 there a focus that January 6 was the next time that anything could happen with respect to
15 the election?

16 A No. We were not focused on it. I mean, maybe Rudy or the other team
17 members are. I wasn't focused on it.

18 Q What was your focus in that period after the 14th of December?

19 A January 20th, because that was when Trump would be out of office. And
20 so I thought, like, I mine, I was just like, well, I'll just fight until he's out of office, you
21 know, try to investigate and figure it out and, you know, look for stuff. So January 6 was
22 never -- obviously it was a big day in the sense that was the day Congress was meeting,
23 but in my mind as far as like the investigation goes, it was never an end date, so...

24 Q Did you think that after the December 14 meeting of the Electoral College
25 anything could be done at that point to change the fact that President Biden would be

1 assuming office on the 20th?

2 A Yeah, I did. I still do, but it didn't happen, so...

3 Q What do you think could have been done between December 14th and
4 January 20th?

5 A I think Mike Pence could have sent the votes back to the states and just --

6 Q Okay. So --

7 A -- confirmed their certification or, you know, I think he could have said -- I
8 think Mike Pence could have done something. I think he has more authority than I
9 would say the liberals read into it. But he chose not to, and so the issue never
10 materialized.

11 Q Did you have any role in researching that, his authority on January 6 as
12 president of the Senate to take some action like that which you described?

13 A No. I mean, I wasn't his lawyer, you know. I was investigating the issues
14 with the election. I was not Mike Pence's lawyer. I had never spoke with him, I never
15 advised him on anything. I had nothing to do with that. That was just my own -- for
16 myself and my own, you know, thoughts about it. I thought that he had the authority to
17 do it.

18 Q So, in this document, if you scroll down just a bit, the focus of this strategic
19 communications plan, as it says there focus of campaign or swing state Republican
20 senators from Arizona, Georgia, Michigan, Nevada, Pennsylvania, and Wisconsin, as well
21 as Republican members of the House and Republican members of the Senate.

22 So this looks to me like federal members of Congress as opposed to state
23 members. Do you know if that's an accurate characterization?

24 A I have no idea, anything about this document.

25 Q Okay. This document, if you scroll down just a bit, it references multiple

1 issues. It talks about dead people voting, underage people voting, goes on to Dominion
2 voting machines and other allegations related to the election.

3 Did you help compile information for Ms. Friess around this time?

4 A No.

5 Q So late December while she was -- may have been working on this?

6 A No.

7 Q No?

8 A No.

9 Q Do you know who Mike Glassner is?

10 A Yeah. I think he is a political campaign guy. Sorry. I don't know what
11 you call those people. I never worked the campaign but, like, he works campaigns.

12 Q Okay. Did you work with him in the post-election period?

13 A No. I met him like three weeks ago randomly, but no, I don't know.

14 Q What about Mark Serrano, do you know who that is?

15 A I do know who he is. I don't know him personally. He is like a media PR.
16 I don't know if he owns his own company or if he works for a company or something, but I
17 think he does advertising, political advertising.

18 Q Can we go to page 6 of this document. You go down to key team
19 members. I'm hoping you might be able to help me, Ms. Bobb, identify some of these
20 initials based on your work with the team. So it says Rudy Giuliani, know who that is,
21 but plan run by BK and KF. Do you know who BK or KF would be?

22 A Bernie Kerik and Katherine Friess.

23 Q What about media advisors SB and BE?

24 A Boris Epshteyn. SB.

25 Q Could that be Steve Bannon?

1 A Oh, yeah, could be. I don't know if that's who it is, but it could be. The
2 initials match.

3 Q Did you ever discuss anything or meet with Steve Bannon in the period
4 between the election and January 6?

5 A I met -- I met Steve Bannon maybe once or twice just with Rudy. It wasn't
6 like a formal thing, like we were having lunch or dinner or something like that, but
7 nothing formal.

8 Q Did you discuss the election?

9 A Probably. I mean, everybody was discussing the election, but I don't
10 remember a specific like, you know, there's no specific agenda with him. It was just kind
11 of what are your thoughts, what do you think about it, that type of thing.

12 Q Did you discuss January 6th with him, the joint session of Congress or the
13 rally on January 6th?

14 A No.

15 Q During any of those discussions was Mr. Bannon making suggestions about
16 potential steps that could be taken in any way related to the election?

17 A Possibly, but it wouldn't have been any different than any of us, you know,
18 just kind of spitballing, like what can you do, what's possible, what's not possible.
19 Probably. I mean, we probably had those discussions but, like I said, he wasn't like there
20 wasn't like a specific agenda.

21 Q Right. That does make sense. Do you -- even understanding that it was
22 sort of spitballing, do you recall any of the ideas that he had?

23 A No. I remember him asking me specific questions about like do you know
24 how many dead people voted? Do you know were there juveniles that voted, like the
25 statistical research? I remember him asking me those questions, but I don't

1 remember -- like I don't remember him saying anything. I remember him like asking me
2 that, but he didn't like say you need to do this or -- you know.

3 I'm sure he did, like maybe he and Rudy talked about stuff, but with me, I -- I don't
4 remember anything specific that he was -- you know. He wasn't like trying to do
5 something.

6 Q Got it. All right. So continuing through this Exhibit Number 37, it says
7 research team, CR and SP. Do you know who that would be or those would be?

8 A No.

9 Q Do you know who Chanel Rion is?

10 A Oh, yeah. That one.

11 Q How about SP, could that be Sidney Powell for the research team?

12 A It could be. I don't think -- I don't think Bernie and Katherine were working
13 with Sidney, but maybe.

14 Q What about influencer outreach, TF. Do you know who that is?

15 A Gosh, this is like a puzzle. Influencer outreach. No. I don't know who
16 they are.

17 Q Tech team is PW?

18 A Phil Waldron, I would assume. I don't know. I don't know. If you are
19 asking me to guess what these initials are, that's what I would guess, but I don't know.

20 Q This influencer outreach, are you aware of any conversations,
21 recommendations, suggestions to use social media or the internet to put out, you know,
22 allegations related to the election?

23 A No. I remember Bernie and Katherine, this was something that they
24 wanted to do. They were talking to Rudy and apparently Mark. I don't know who they
25 were talking to, but this was their thing obviously. And they were keeping it like super

1 tight under wraps, so I was not -- like I was expressly excluded from these conversations.

2 So I don't know, but I don't know what they wanted to do.

3 Q Do you know why you were excluded?

4 A I think they just wanted to keep it small because, you know, the less people
5 that know what you are trying to do, less likely it's going to leak, but I don't know.

6 Q Was it viewed as controversial? I mean, I guess just help me understand
7 why --

8 A I don't know. I don't think there's anything controversial about it, but I
9 don't know.

10 Q While we are on this issue of social media influencers, there are several sites
11 that talked about fraud in the election. I mean, it's all over social media, Twitter,
12 otherwise too, but there are some sites that I guess focused on a little bit more than the
13 others. One is called The Donald Dot Win.

14 Have you ever heard of that website?

15 A What's it called?

16 Q TheDonald.Win.

17 A No, but I can't wait to see it. Do you have it?

18 Q Patriots.Win; are you familiar with that?

19 A No.

20 Q Do you remember anybody ever mentioning those websites to you?

21 A No, but they sound amazing.

22 Q How about there's a Reddit site for a while, it was a Reddit board called The
23 Donald. Were you familiar with that?

24 A No. I mean, I'm obviously familiar with Reddit but, no, I don't know what
25 that site is.

1 Q If we go to the next page, page 7 of this strategic communications plan, it
2 talks about rallies and protests, and it says, organize events in six states where the targets
3 were protests at local officials' homes and offices, protests at governors' mansions,
4 protest at Secretary of State's home, protest at weak members' homes, protest in DC,
5 rally for key House and Senate members.

6 Do you remember discussions about the need to have protests in various places
7 including in front of elected officials' homes or in Washington, D.C. in this period late
8 December?

9 A No. Like I said, on this media strategic plan or whatever it's called, they
10 were very quiet about it. So I don't know.

11 Q If we go to Exhibit 38, this is an email from Doug Mastriano, Senator
12 Mastriano to Ms. Friess, Mr. Giuliani, you, Ms. Ellis. And it's about letters to Senator
13 McConnell and Leader McCarthy. This is from December 31. And in it Senator
14 Mastriano attaches letters to both of them, McConnell and McCarthy, asking that they
15 dispute the Pennsylvania election results, and says they are signed by my colleagues in
16 the Pennsylvania House and Senate.

17 Do you remember this, getting letters from Senator Mastriano or others asking
18 members of Congress to dispute election results on the January 6 joint session of
19 Congress?

20 A Yes. I think so. Is this the letter where they are asking for their electors
21 back?

22 Q You go to page 2 of this exhibit.

23 A Yeah.

24 Q Okay. What was your role or the legal team's role, if any, in getting these
25 letters, drafting the letters, requesting the letters, anything at all?

1 A My role was not -- I didn't -- I don't think I had any role. Particularly with
2 Pennsylvania one I had -- I know I had no role in this. I had no idea if anybody else did or
3 not.

4 Q Did you -- did you in your capacity with Arizona or Nevada or any of the
5 other -- Michigan, the other states that you worked on, have any role with respect to
6 letters to the Vice President or members of Congress about the joint session?

7 A I don't remember specifically. I may have mentioned it to Mark Fincham.
8 Like once I saw this, I may have said, hey, get somebody into this; does Arizona want to
9 do it. But like I don't specifically remember asking him to do that, but I may have.

10 Q Do you remember encouraging him to do something like this?

11 A No. Like I said, I could have. It wouldn't have -- if you interview him and
12 he says, Oh, Christina called me and asked me to do it, that very well could have
13 happened, but I don't specifically remember doing it.

14 Q Did you think or others on the legal team think letters like these were
15 important for the joint session on January 6?

16 A Yeah, I think so. I think -- I think they are important anyway, whether it's
17 January 6 or not. I think it's important to object where appropriate.

18 Q And in this letter, specifically on page 3, it says, They are asking for more
19 time in delay certification of the Electoral College to allow due process as we pursue
20 election integrity in our Commonwealth.

21 Is that what you were referring to earlier when you said that Mike Pence could
22 have or joint session could have delayed certification?

23 A Yeah. Just give them the time to look into whatever they are looking into
24 to make sure that they are satisfied that their state sent the right electors. Just because
25 it gives them more time doesn't mean that they are going to change their vote. It just,

1 like, it's up to the state legislatures.

2 It's not -- there's nothing a legal team can do. There's nothing Mike Pence could
3 have done as far as like switching electors, I don't think. Maybe. I don't know. I
4 didn't get into that, but I do think he had the authority to give them more time to look
5 into it.

6 Q At this point -- go ahead. I'm sorry.

7 A No. That's okay. That was it, just to look into it. I think he could have.

8 Q So by this point, you know, this is dated January 4th, it's been two months
9 since the election. What was the view that, you know, another 10 days could actually
10 matter? I mean, they have had two months to do something. They have been fielding
11 calls to look into it.

12 The hotel hearings and other hearings took place in late November and early
13 December. Why an extra 10 days at that point?

14 A You have to ask them. I don't know. Were they planning on calling
15 themselves into session? Were they -- earlier I think you showed me an email where he
16 said we can't do anything until January 5 because of some Byzantine rule. So I'm
17 guessing there was a procedural issue where they couldn't do anything until January 5.

18 So he's saying let us call ourselves into session. I don't know. I mean, you are
19 asking me to guess. I have nothing to do with this. But based on other information
20 you have shown me from Doug Mastriano, that's what I would suspect is procedurally
21 they had to wait until the 5th before they could do anything, and they wouldn't have it
22 done before the morning of the 6th. So give us time to call ourselves into session and
23 reconsider this. I don't know.

24 Q You are right. We did look at an email earlier where Senator Mastriano
25 referenced a rule about subpoenaing Dominion machines or voting machines, something

1 to that effect.

2 [crosstalk]

3 A BY [REDACTED]

4 Q I think we missed that, Ms. Bobb. I'm sorry.

5 A I said so this letter appears to me to be asking for time to do an
6 investigation.

7 Q Okay. And ultimately there's a letter, and we have it here, we can show it
8 to you, but a letter signed by representatives from I think all of the six states in play
9 referred to as the contested states. You are talking about something in Pennsylvania.

10 I guess what would the extra time do for those other states in your opinion? I
11 mean, you thought it would be helpful too, I think you testified earlier?

12 A I know. I do think it would be helpful. I don't know what the procedure
13 and rules of every state, but if the state legislators were asking for it, obviously they saw
14 some value in the opportunity to confer with their colleagues and determine if they
15 needed to make a correction or if they could make a correction. I don't know, but it
16 would have been up to the state legislators.

17 Q And did you say you recall receiving other letters like this from
18 Representative Finchem or otherwise?

19 A I think that --

20 [crosstalk]

21 A -- before, I think -- Pennsylvania, Wisconsin, Arizona and Georgia all sent
22 letters, I think.

23 Q And what did you do with those letters, to the extent you did anything after
24 you received them?

25 A I didn't do anything with them. They weren't sent to me. I mean, I

1 probably have copies of them, but they weren't letters to me. They were letters to Mike
2 Pence or McConnell, you know. They went to -- you know, I never -- the Arizona
3 legislature never personally sent me a letter, so I didn't do anything with it.

4 Q Fair enough. But like this letter that we are looking at right here was sent
5 by Senator Mastriano to Katherine Friess, Rudy Giuliani, you, and Jenna Ellis, so was he --

6 A -- know that it happened, but it's not addressed to us. It's addressed to
7 McConnell and McCarthy.

8 Q I guess that's my question. Do you know whether they were asking you to
9 pass these along, or was this just like a courtesy copy, if you know?

10 A I would imagine it's a courtesy copy. I don't know.

11 Q But you are not aware of anybody doing -- excuse me, any -- you are not
12 aware of anybody doing anything with these letters addressed to members of Congress or
13 Vice President Pence from the legal team's perspective?

14 A Yeah. I mean, they are not addressed to us. Yeah. We didn't do
15 anything with them.

16 Q If we could go to Exhibit Number 40. This is a document that you provided,
17 an email from Katherine Friess to Mr. Giuliani, Ms. Rion, Mr. Kerik, Stephen Bannon and
18 you. Subject is Chairman Graham dead votes memo for your consideration. And then
19 attaching a document or, excuse me, a couple documents, one Word document and one
20 Excel document.

21 She says, Mayor, attached please find a memo to Senator Graham, along with a
22 spreadsheet from the Kaufman-Geels team regarding dead voters in Georgia.

23 Q Do you remember Senator Graham reaching out to the legal team for
24 information related to dead voters in Georgia?

25 A Yeah, I did.

1 Q Tell us about that. What do you remember?

2 A That was -- I think that was the second time that -- I don't know if it was the
3 first or second time that I was in Meadows' office, but Graham -- it may have been after
4 the phone call. I don't know. It was probably after the phone call. Maybe Graham
5 was there too. I don't know. But we were in Meadows' office, and Graham was like,
6 oh, I'd love to support the cause. I think it would be great to, you know, really show all
7 the fraud. Send me a memo and show me, you know, what information you have got.
8 I'll champion it.

9 So she sent him a memo, and he did nothing with it.

10 Q Okay. That meeting that you had, I understand that there was a meeting
11 around January the 2nd with Mr. Meadows, Senator Graham, Mr. Giuliani?

12 A That's related. Yeah.

13 A Okay. And that was the same day as -- at least I understand it, the
14 Secretary Raffensperger call?

15 A Okay. That makes sense. Yeah. That's probably right.

16 Q Was Senator Graham there for the call with Secretary Raffensperger or did
17 that happen before or after?

18 A He must have been there. I don't remember which came first and which
19 came second, but he was in the room when we were talking about the election stuff. So
20 that makes me think that Graham was also in the room during that call, but I don't
21 specifically remember.

22 Q Do you remember anybody joining the meeting you had with Mr. Giuliani,
23 Mr. Meadows and Senator Graham via phone?

24 A On this particular -- particular topic, I don't remember. There may have
25 been someone on the phone beforehand. And my recollection is that talking about

1 putting the memo together for Graham, there was nobody else on the phone or
2 otherwise, but there could have been something -- there could have been something like
3 before or after or something. I don't know. I don't remember.

4 Q Okay. Just walk us through that conversation as best you can between
5 Senator Graham, Mr. Giuliani about the joint session on January 6th at all and evidence of
6 fraud?

7 A I did. I mean, that was the extent of it. Senator Graham was saying get
8 me your information. He goes, You don't even have -- he goes, Don't give me all of it.
9 Don't tell me everything because it's too overwhelming. Just give me five dead voters;
10 give me, you know, an example of illegals voting. Just give me a very small snapshot
11 that I can take and champion.

12 And that -- I actually did one as well, I think. Maybe this is it. I don't know.
13 But Katherine obviously sent it and he did nothing with it.

14 Q Okay. Do you remember in that meeting that you had at the White House
15 with Mr. Meadows anything coming up about the joint session of Congress or the rally on
16 the Ellipse that day?

17 A No, nothing.

18 Q Do you remember anything coming up about marching to the Capitol or
19 protests where people would march to the Capitol during that meeting?

20 A I don't think we talked about it at all.

21 Q Do you remember ever being in Mr. Meadows' office where those topics
22 came up?

23 A No. I don't ever remember having that discussion with anybody.

24 Q All right. So, in this memo, Ms. Friess says, This is significantly smaller in
25 scope than we expected, and only includes Georgia due to the following issues:

1 Pennsylvania numbers not being able to be verified, Michigan numbers were from the
2 CheckYourVote website, and since we couldn't verify those, and given the problems -- or
3 excuse me, the problems with PA, I don't believe we should send those to Chairman
4 Graham.

5 Nevada numbers only had date of birth and DOD, date of death, and did not
6 include ballot or turn date, and thus do not believe we should provide those to him
7 without that information. And then it goes on to say, the chairman very specifically said
8 that he only wanted verified numbers.

9 A Okay.

10 Q And then it says, in the last paragraph, one last item, many of the dead
11 voters on the Georgia list sent their vote in before they passed. I don't think this makes
12 a particularly strong case. And I think it is possible that Chairman Graham will push back
13 on that.

14 Almost all of them died in October of 2020, a few in November of 2020, and a few
15 in September of 2020. I think this makes the case for unfortunate timing. Many sent
16 their ballots before they passed, rather than nefarious activity. Am raising this just so
17 everyone is aware of what the data actually says.

18 Do you remember getting this email in January, around January 4?

19 A No. I got this email? I'm on it?

20 Q You are. This is something you produced to us, Ms. Bobb.

21 A Oh, okay. No. I don't remember getting it, but I remember having this
22 discussion with her. So, I mean --

23 Q Tell us about that. It seems like there's some questions about the data.
24 Go ahead. I'm sorry.

25 A This is it. I mean, she -- she and I had this conversation, and she just put it

1 in writing in the email. I didn't remember reading it, but I remember her saying this.

2 Q And do you remember whether these conclusions that Ms. Friess made
3 about dead people voting or the inability to verify dead people voting in Georgia affected
4 at all the messaging that a legal team or anybody else was putting out about purported
5 fraud in the election?

6 A No. They are talking about that specific website. Like if you scroll up,
7 she's talking about -- well, I can't see it. She's talking about the website from
8 CheckYourVote.Org. That was a website that had dead voters on it. She's saying we
9 can't verify the information on that website.

10 Q I think she's saying that they don't include Michigan numbers from that
11 website because of the problems with that website. But this is all about Georgia
12 information separate from that. Do you have a different understanding?

13 A I don't -- I mean, I don't know. This is -- this is her thing. You would have
14 to ask her, but I know that as she lays out here, we tried to be very specific and very
15 accurate with the information we were finding.

16 Q And did you do any work related to dead voters in any states?

17 A Yeah. I looked into it and, I mean, I looked into all of the different kinds of
18 problems in the states. And I came to a similar conclusion that she did, where I -- there
19 certainly were dead people that voted in certain states, but I don't think the dead voters
20 alone were the substantial problem.

21 I mean, I think there were many other problems. I think voter overload and
22 other issues were a much bigger problem than dead voters but, yeah, there were a
23 handful of ballots that were cast. Were they cast before the person died? Were they
24 cast nefariously by a loved one after that person died? Was their name used, you know,
25 surreptitiously by someone who had access to the voter role, like, I don't know. How do

1 you verify. I don't know. So the dead voters are a hard one to verify.

2 Q Do you know who Brian Geels is? G-E-E-L-S?

3 A I do.

4 Q Did you work with him at all in the post-election period?

5 A Only to the extent that I used his affidavit. Like he put together a very
6 thorough affidavit of his analysis. And I took information from his affidavit, but that was
7 it.

8 Q I believe some of the information he put in his affidavit related to dead
9 voters; is that fair?

10 A Probably. I mean, you would have to show me what his affidavit said but,
11 yeah, probably.

12 Q Okay. And --

13 A Do you know -- analyze the voter role and, you know, looked at all of the
14 questionable votes.

15 Q And given this difficulty in verifying potential dead voters, and Mr. Giuliani I
16 believe said that there were something like 10,315 dead voters in Georgia; do you know if
17 Ms. Friess or anybody else ever said that it may not be that number, that that may be an
18 inflated number based on some of the difficulties in verifying?

19 A No. I don't know where that number came from, like where -- did that
20 come from Brian Geels?

21 Q I know Mr. Giuliani said that, and I believe that it may have been informed
22 by Mr. Geels.

23 A Oh, I don't know. I mean, I don't have the numbers memorized, but I don't
24 remember specifically how many or what --

25 Q Go ahead. I'm sorry.

1 A I do think Brian Geels did good work. I don't think his work has been too
2 substantially challenged but, I mean, I don't have it memorized. I don't know what it
3 said.

4 Q Okay. And along those lines, I do think Mr. Geels talked about dead voters,
5 particularly those in Georgia, because he was involved in litigation --

6 A Yeah.

7 Q -- in Georgia. Do you remember Ms. Friess or anybody else pushing back
8 on Mr. Geels' information or the opinions that he explained in his affidavit based on
9 findings like the one she laid out here in Exhibit Number 40?

10 A No. I don't think she's pushing back on Geels' information here. I don't
11 know. You would have to ask her.

12 [REDACTED] Did anyone ever push back on the public statements that
13 Mr. Giuliani was making about the number of dead voters?

14 Ms. Bobb. I don't know.

15 BY [REDACTED]

16 Q Did you?

17 A No. I don't think so. I'm not aware of statement -- like lots happens, you
18 know. I don't control everything. But I'm not aware of a statement that Rudy made
19 that I identified as inaccurate. There may have been one. I don't know. I am not
20 like -- I don't know. I -- when you ask me if I've ever corrected a statement, no, because
21 I'm not aware of any statement that he may made that I would say is inaccurate, but I
22 don't know.

23 Q Do you know where Ms. Friess lives these days?

24 A No idea.

25 Q You haven't been in contact with her since January 2021?

1 A Nope.

2 Q All right. I understand that on January the 4th, yeah, on January 4th, I
3 understand there's a meeting with Cleta Mitchell and staff members working for Senators
4 Holly, McConnell and Cruz about evidence of election fraud in Georgia.

5 Do you know anything about that meeting?

6 A Nope.

7 [REDACTED] Can I ask a question really quickly. On the email that we just
8 discussed from Ms. Friess transmitting the draft memos for Senator Graham, it looks like
9 she sent it to Mr. Bannon as well. Do you know why he would have been copied on
10 that?

11 Ms. Bobb. No idea.

12 BY [REDACTED]

13 Q Okay. We can go to Exhibit Number 44. For that page 2, this is an email,
14 you did not provide this Ms. Bobb, but this is an email from Boris Epshteyn. It says, Per
15 Mayor Giuliani, attached please find following info: The first is the bullet point overview
16 numbers of interest; the second is a substantive analysis; the third is Peter Navarro's first
17 report. Thank you, Boris.

18 And that was sent to Jason Miller, Ali Pardo, and Tim Murtaugh. And then
19 Mr. Miller sends it to Marc Short who is the chief of staff for Vice President Pence at the
20 time.

21 Are you familiar with any effort to develop like briefing materials or information
22 for members of Congress ahead of the January 6 joint session?

23 A No. But that -- I don't know. I have no background. I had nothing to do
24 with this, but reading this email I don't think it's a briefing memo. I think it's going to
25 the Coms team. Jason Miller and Tim Murtaugh are coms. I think Boris is sending it to

1 them as talking points.

2 Q Not an unfair assessment. The only reason I'm asking is because the
3 subject line is briefing materials for house members and senators, and I should have
4 mentioned that.

5 A No. I don't know.

6 Q Okay.

7 A Who did?

8 Q Did you have any role in putting together information to give to members of
9 the House or Senate in advance of January 6?

10 A No.

11 Q Do you know if anybody did?

12 A No, not to my knowledge. I mean, somebody might have tried, but I'm not
13 aware of anybody who did.

14 Q It's been reported that on the evening of January 5, Mr. Epshteyn,
15 Mr. Giuliani and Mr. Bannon were reaching out to members of Congress to encourage
16 them to reject Biden electors during the joint session.

17 Do you know anything about that outreach to members of Congress?

18 A Nope.

19 Q Did you reach out to any members of Congress to encourage them to object
20 or not adopt certain electors in the joint session?

21 A No.

22 [REDACTED] Do you have any question?

23 [REDACTED] Yeah. Earlier you mentioned being in Mr. Meadows' office with
24 Mr. Giuliani on the day of the call with Georgia Secretary of State Fred Raffensperger,
25 which would have been January 2nd.

1 Were you with Mr. Giuliani during the entire time that he was visiting the White
2 House that day?

3 Ms. Bobb. No. Well, no. I mean, that meeting with Meadows, the phone call
4 and then that -- I assume the aftermath of the discussion with Senator Graham was I
5 thought the only meeting he had that day because I think I did go with him, but I don't
6 know if he was there at any other time that day.

7 ██████████ Did you remember leaving with him?

8 Ms. Bobb. I think so. I think we came and went together.

9 ██████████ Okay. So you don't remember any other meetings that
10 Mr. Giuliani had other than the things that you have already described to us on that day?

11 Ms. Bobb. I think, unless -- if he had meetings before that, he would have gone
12 there and back without me.

13 ██████████ Understood.

14 Ms. Bobb. Yeah.

15 BY ██████████

16 Q And where were you going there and back from? I understand that
17 Mr. Giuliani was set up an operation, essentially an office in the Willard Hotel?

18 A Everybody -- like it sounds -- like it was his hotel room. It was just his hotel
19 room, but yeah, that's -- I met him at the Willard. We went together and went back.

20 I live very close. I live on ██████████ and I can walk to the Willard, I
21 can walk home. So I just walked to his hotel, got in the car, came back, walked home.

22 Q Will you pull up Exhibit Number 45? I do want to talk to you about the
23 Willard. I understand that that's where he set up his office, but tell us about some of
24 the activities, the meetings that were going on there.

25 A Well, I mean, that's -- that would be attorney-client privilege to the extent

1 that you want to know what happened in the legal office of Rudy Giuliani. You can call it
2 a legal office. It was his hotel room. I mean, to the extent that we did legal work
3 there, I can't discuss that, but -- you know.

4 Q Okay. Let's pull up Exhibit Number 45, page 2 specifically. Okay. So this
5 photograph, I assume this was taken in the Willard while you were there; is that right?

6 A Yup.

7 Q Is that you in the middle where it says Bobb?

8 A Yup.

9 Q All right. Mr. Giuliani where it says Mr. Giuliani. And do you remember
10 Mr. Eastman being there?

11 A Yeah. I remember Eastman. I have no idea who that little -- who is that?

12 Q Okay. So you don't know who that is?

13 A No idea. Who is he?

14 Q I'll represent to you he's been described as someone associated with the 1st
15 Amendment Praetorian, a business development person. I'm not familiar with him
16 being a lawyer.

17 A He was not on the legal team. That's for sure.

18 Q Okay. If we go to page 3. I understand Mr. Hyde, do you know who that
19 is?

20 A No. I interacted with him that day. He was really weird and asked to
21 leave, escorted out. And I'm not surprised that he took a bunch of pictures and posted
22 it but, no, I don't know him personally. I met him that day and have never talked to him
23 since.

24 Q And you say that day. Do you remember when these photographs were
25 taken or what day it was when you were there?

1 A Well, I'm assuming that that's January 6 because that's what it says all over
2 the internet. I don't actually remember but, I mean, if you know, please tell me, but I -- I
3 believe that's January 6 just because that's what's been reported on line.

4 Q Do you remember if this was before the rally, after the rally, the evening?
5 What time of day do you remember being there?

6 A It would have been in the evening because I was at the Capitol earlier. Like
7 I was reporting from the Capitol that day. And then later in the day we went to the
8 Willard. So that would have been at night.

9 Q Do you remember approximately what time you got to the Willard after
10 reporting at the Capitol?

11 A I left kind of early, somewhere between 11:00 a.m. and 1:00 p.m. probably.

12 Q And so this was after, these photographs were after the violence at the
13 Capitol started, people got into the Capitol?

14 A Right. This was -- that guy, whoever Hyde is, I remember him coming at
15 night because -- I don't know who he is, but it's like -- I think he had gone out -- he was
16 there. He was in the room in the evening, and so I remember that night, but at least
17 when this picture was taken, but I don't -- that's all I remember.

18 Q There's a person there in orange, Mr. Oltmann. Do you know who that
19 is?

20 A Is that Joel Oltmann or Joel Oltmann?

21 Q Do you remember from being there? I believe he's a podcaster?

22 A Yeah. I think that's him. It's hard to tell from the picture, but if that's
23 who it is then, yes, I met him. I don't -- I don't remember -- I mean, obviously I'm in the
24 picture with him. I don't specifically remember meeting him in Rudy's room but, yeah, I
25 remember meeting him at the Willard.

1 Q Do you remember what he was doing there?

2 A No.

3 Q And what was happening at that time? This was after the attack on the
4 Capitol had started. What was going on inside the room?

5 A Nothing. Everybody was just watching the news and eating and trying to,
6 like, some rando talked his way in for a few minutes and security escorted him out.
7 There's nothing happening.

8 Q Were people making calls to members of Congress in that period from the --

9 A No. No. By 1:00 or 2:00, by the time I got there everything was like, I
10 mean, everything that happened at the Capitol was a huge disappointment and
11 everybody was upset about it. So, no, nobody was doing anything. Everyone was just
12 kind of sad.

13 Q Huge disappointment in what sense?

14 A It was a huge disappointment in the sense that, I mean, in every sense of the
15 word: One, the fact that there was violence at the Capitol; Two, the fact that to some
16 extent there -- I believe they were framing Trump supporters.

17 I was there. I was at the Capitol on January 6. I reported from Cannon. I was
18 standing in the grass and I watched what happened. The -- the level of violence or
19 activity was small, very small in comparison to the number of law enforcement that were
20 there. You know, military -- I was a judge advocate in the United States Marine Corps.
21 I'm very versed in the use of force and the escalation of force, and I know what law
22 enforcement -- not only do I know what law enforcement can and can't do, but my job
23 when I was deployed to Afghanistan was partially was to train our military on how to use
24 the escalation of force in urban settings. And they should have been very, very easy to
25 quench the uprising or whatever it was that we saw.

1 And the vast majority of people that I saw there, the Trump supporters that I saw
2 there were trying to make it stop. I personally do not believe the Trump supporters
3 instigated January 6. And, I mean, it was just really disappointing that it looked like
4 President Trump supporters were getting framed.

5 I do believe they are being held as political prisoners. I think it's a shame and an
6 embarrassment to this nation what's happening to them. And especially considering
7 months before in -- I think it was May 2020, Black Lives Matter and Antifa assaulted the
8 White House. President Trump had to go to the bunker because they were breaching
9 enough to cause very serious security concerns. You have got Kamala Harris and a lot of
10 the liberal politicians saying, oh, get them out on bail. Get them out on bail.

11 They just attacked the White House. Then you have someone take a selfie in the
12 Capitol and they are incarcerated for over a year. I think it's disgusting, quite honestly.
13 So I think the way everything that happened and went down, it was a very sad day for
14 different reasons than the liberal narrative that we pushed, we were all saddened.

15 Q Understood. And I'm not here to challenge you on your beliefs, Ms. Bobb,
16 but have you seen the court documents for some of these cases of people who say that
17 they did this. They broke into the Capitol because they believed that Mr. Trump was
18 asking them to. Have you seen those documents?

19 A I've seen documents. I've also been a criminal -- I was a criminal defense
20 attorney in the Marine Corps. I'm very well aware of how those documents get created.
21 And I'm not -- don't get me wrong, I'm not in any way trying to absolve everyone of
22 responsibility. Certainly anybody who breaks the law should be held accountable.

23 I don't think solitary confinement for ten and a half months is a solution, but yet
24 it's happening. And I don't think starving people because they have dietary restrictions
25 and they have to be incarcerated in federal prison, I don't think that's appropriate. I

1 believe that's cruel and unusual punishment.

2 So, yeah, should people be punished, probably? I don't know. Do I think they
3 were set up? Do I think it's a political ploy? Do I think that the standard for
4 conservative protesters verse the violence that we saw, all of 2020 where people were
5 rioting, looting. People were murdered and killed, and people were dying because of
6 the destruction. People lost their homes and businesses. And someone goes and
7 takes a selfie in the Capitol, I don't buy it. I don't buy it.

8 I think the whole thing is fake. I think it's a political ploy, and it really angers me.

9 Q And I'm not here to move you off your views, Ms. Bobb, just ask questions
10 related to the day and what you saw and know. You mentioned that it was people --

11 A You asked me why we were disappointed. That's why we are disappointed.

12 Q Yeah. And so my follow-up question that I asked, was any part of the
13 disappointment related to Vice President Pence and what he did or did not do on that
14 day?

15 A Yeah. Pence was a huge disappointment across the board. I mean, he's a
16 disappointment as a conservative but, I mean, that -- yes, that is part of the
17 disappointment, but I think the whole thing is really tragic.

18 Q So we know that Mr. -- and this has been publicly reported that Mr.
19 Eastman, Dr. Eastman was exchanging emails throughout the day and that afternoon and
20 into the evening with Greg Jacob, the attorney for Vice President Pence. It looks like he
21 was in the picture in the war room.

22 Were there any discussions about that, about contacting staff for the Vice
23 President about his role in the joint session while you were there that day?

24 A Not at that point. No. I mean once -- not by January 6th, probably
25 maybe -- maybe on the fourth or fifth, like leading up to it to try to explain to him like you

1 actually have the authority to do this, but by the sixth rolled around, what are you going
2 to do, there's...

3 Q We do know that Mr. Giuliani left a message I think for -- intended for
4 Senator Tuberville, and he did so in the evening. Do you remember him doing that from
5 the room?

6 A I sure do.

7 Q All right. Tell me about that.

8 A I mean, I just remember it. He left a -- I don't remember what he said or
9 what he did, but he left a detailed message and it was for the wrong senator.

10 Q Part of the message, and I believe we have it as an exhibit, we can show it to
11 you, but my understanding and my summary of it is that he's asking Senator Tuberville to
12 do something still, to seek more time for some --

13 A Oh, yeah, I think he was. He was, yeah, give them more time or send it
14 back, something like -- I think that's fine. Yeah. That's what it was.

15 Q Do you know if Mr. Giuliani or others were making similar calls to other
16 senators or House members?

17 A I don't specifically remember who or what, but probably. I mean, he, yeah,
18 you know, objecting to electors is something that's done I think in every single
19 presidential election. So I don't think -- and this one was particularly objectionable, so
20 probably. Like I said, I don't remember specific people but, yeah, that was probably
21 happening.

22 Q And the time period specifically was the afternoon or evening of January 6th.
23 Do you remember that happening with Mr. Giuliani, like when he left the message for
24 Senator Tuberville?

25 A I don't remember specific days or anything like that. I think the sentiment

1 by the evening of January 6 was like, you know, it's over and stuff, so...

2 [REDACTED] I mean, to be clear, Mr. Giuliani's voice mail message to Senator
3 Tuberville was at like 7:00 p.m. on the day of the sixth. Was there a sense on that day,
4 like that evening, that there was still a chance to encourage members of Congress to
5 delay or to object to elector certification?

6 Ms. Bobb. I mean, I don't -- I don't remember when it like fizzled out like by the
7 day, the hour. Like now we are talking about a difference of 12 hours, whether it was
8 the 6th or the 7th, you know, I don't know. But generally after the events of January 6,
9 the effort was largely over.

10 BY [REDACTED]

11 Q Do you remember General Flynn being at the Willard at any point when you
12 were there?

13 A I don't think he was there while I was there. I mean, he may have been
14 there, but I don't remember seeing him there.

15 Q And what was his role, if any, with respect to legal challenges, the legal team
16 in that period just before the sixth?

17 A I don't know. I mean, I think he was working primarily with Sidney, so I
18 don't know what she was doing with him, but...

19 Q Do you remember Roger Stone being at the Willard?

20 A I do not.

21 Q Did you ever talk to Roger Stone in the period after the election up to
22 January 6?

23 A I don't think I've ever talked to Roger Stone.

24 Q How about Alex Jones, did you ever talk to him in that period between
25 November and January?

1 A I don't think so. No.

2 Q Now, the Oltmann, the person we just looked at, I believe the podcaster,
3 what was his role, if any? What was he doing in the Willard?

4 A I think he was there separately. I think he was there with his buddies or
5 whatever and -- I don't know. I don't know what they were doing or what they were up
6 to. I did -- I met him and they were up -- I think they were up a floor or two. I said
7 hello, introduced myself. I think they were working on some stuff similar to what, you
8 know, we were -- they were just investigating, trying to find stuff, but we weren't like
9 formally linked or anything.

10 Q At that point after the attack had started on the Capitol, were there any
11 discussions about investigating the attack itself, about looking at who was causing it, who
12 was doing it, and did you take steps in the Willard to actually do that?

13 A Well, at that point we were -- there was a lot happening at that point.
14 There was debate about who had started the attack. Like some people were going, oh,
15 this makes Trump supporters look really bad. And some people were going -- I took the
16 position of those aren't Trump supporters. I was standing out there, and the Trump
17 supporters were trying to stop it.

18 It was very confusing having stood on the Capitol to see that the ruckus was
19 actually quite small. And I was there before the doors were open. So when I was out
20 there, nobody had actually gone in. And it was very confusing because the -- it's cliche to
21 say this because it was so abused in the summer of 2020, but it was overwhelmingly
22 peaceful. And there were a few, you know, pockets of people, but most of them, Trump
23 supporters were trying to get the bad actors, so to speak; they were trying to get them to
24 stop.

25 And the police officers weren't stepping in. They weren't using escalation of

1 force standard operating procedures as I'm used to seeing. And so it was confusing.
2 And in the 15 minutes that it takes to walk from the Capitol to the Willard, and then, you
3 know, I walk in the Willard and you see it on TV, and it makes it look like there's a fricking
4 war zone going on. I mean, it was -- it was really confusing.

5 And so there was a debate about who was actually, like who was doing it. There
6 was some discussion about that, but --

7 Q Just from a timing perspective, you said you left the Capitol before people
8 made it into the doors and into the windows?

9 A Yeah.

10 Q Okay. And you mentioned Mr. Oltmann and his friends. What were they
11 working on?

12 A I don't know. I mean it was similar, I think, to the stuff we were working
13 on, like trying to figure out like data set. I think they were looking more at data or
14 machine information. I don't know exactly what they were looking at.

15 Oh, yeah, yeah. No. This was Oltmann. He was like the Dominion guy, right,
16 so, yeah, I think he was looking at the machine stuff, but I don't know. It was similar,
17 but I don't specifically remember what it was.

18 Q In these photos we looked at, there's this Luelsdorff person, Oltmann,
19 Mr. Hyde, a lot of people not associated with the legal team. So can you just describe
20 that afternoon, you know, what was John Eastman saying in the afternoon at the Willard
21 about what was happening at the Capitol or during the joint session?

22 A Well, I mean, so at what point -- this period of time that those pictures are a
23 snapshot in time, there was a group of people who had like made their way into Rudy's
24 room. And they were -- security was called and they were escorted out. So the
25 unwanted visitors were not there very long.

1 To the extent that there was any like legal discussion, I mean, that's privileged
2 discussion among the legal team.

3 Q And I'm just asking in the period where, like Mr. Oltmann and his friends
4 who were there investigating stuff or looking into things who were not part of the legal
5 team, or Mr. Hyde was there, Mr. Luelsdorff was there, what those discussions were?

6 A I do not -- I don't ever remember Eastman saying anything while those folks
7 were in the room. The only thing I remember about Hyde being there lasted maybe,
8 maybe five minutes. I'm probably being generous. And everybody was uncomfortable
9 and was like who is this guy, how did he get in the room. And they were escorted out.

10 [REDACTED] Okay. Why don't we do this, and I think now would be a good
11 time for a quick break and then we can assess where we are, come back and hopefully
12 wrap up relatively soon.

13 Does that work for you, Ms. Bobb?

14 Ms. Bobb. I would like to wrap up relatively soon. So, yes, like how much time
15 do you need?

16 [REDACTED] Five minutes at the most, just a quick comfort break for everyone.

17 Ms. Bobb. Yeah. Okay.

18 [REDACTED]. All right. Let's do that. Let's go off the record. Thank you.

19 [Recessed at 4:20 p.m.]

20 [REDACTED] Let's go back on the record. It's 4:26 and we are resuming the
21 transcript interview of Ms. Christina Bobb.

22 BY [REDACTED]

23 Q All right. I want to talk to you about the Vice President and his role in the
24 joint session.

25 When was the first time you became aware of discussions about the role of the

1 Vice President as president of the Senate during the January 6 joint session of Congress?

2 A I mean, I can't say, but I would think that would be attorney work product.

3 Q Just as far as when. Not asking for the content of any communications or
4 any thoughts or impressions.

5 A I mean, one, I don't remember specifically, but I would think -- I don't
6 remember.

7 [REDACTED] Mr. Sibley, I see you came off mute. Did you want to say
8 something?

9 Mr. Sibley. I just wanted to say, I mean, she can state when she first became
10 aware of the issue but, yeah, as to the substance of any communication that made her
11 aware obviously might be privileged.

12 Ms. Bobb. I was thinking of the timing of it to the extent that it would potentially
13 show, you know, conclusions or something. I guess the objection is a bit irrelevant
14 because I honestly don't remember.

15 Q BY [REDACTED]

16 Q Okay. So it's been reported shortly after Thanksgiving weekend, Boris
17 Epshteyn relayed to people in the White House an idea from Giuliani's team that the Vice
18 President could reject electors, or I guess potentially take some other action related to
19 the joint session.

20 Are you aware of Mr. Epshteyn relaying to people in the White House that idea?

21 A I mean, I wasn't part of it whenever he did it, but if you are saying it
22 happened, I'm sure it did. He was --

23 Q Do you --

24 A -- the White House, I was not, so...

25 Q Do you remember talking with anybody who worked in the White House

1 about this idea about the Vice President's role in the joint session?

2 A No. I didn't.

3 Q Do you remember hearing that Vice President -- or, excuse me, that
4 President Trump wanted Vice President Pence to meet or speak with John Eastman
5 December of 2020 about his role in the Electoral College -- or, excuse me, the joint
6 session?

7 A I remember hearing about that but I -- like through open sources. I mean, I
8 wasn't privy to President Trump's conversations, planning or conversations.

9 Q Do you remember anybody reaching out to John Eastman to have him draft
10 memos related to the joint session and the Vice President?

11 A Somebody may have or did, but it wasn't me.

12 Q Okay. And you don't know who it was?

13 A No.

14 Q Have you ever seen Mr. Eastman's memos? There's two of them. There's
15 a shorter one and a longer one. And I can pull them up for you here if you'd like.

16 A I mean, the ones that you showed me, but they were not sent to me. I
17 don't remember them being sent to me. If they were sent to me, I didn't, you know,
18 look at them or read them.

19 Q Bear with me just a moment. All right. If we could pull up Exhibit 46.

20 So this is one of Mr. Eastman's memo, talks about a January 6 scenario that seven
21 states have transmitted dual slates of electors to the President. And it talks about
22 ultimately on page 2 a proposal where the Vice President takes some action or a
23 combination of actions in his role as President of the Senate.

24 Looking at this now, do you recognize this document?

25 A No. Did I give it to you?

1 Q You did not provide this to us. No.

2 A I don't recognize this.

3 Q Without getting into the substance of the conversation, do you remember
4 talking to Mr. Eastman about his memos that are now publicly reported?

5 A I don't think I've ever talked to him about his memos.

6 Q What about his theories about the Vice President, without getting into the
7 substance of them?

8 A Without getting into -- so what's the question?

9 Q Did you -- do you remember ever talking to Professor Eastman about his
10 theories related to the joint session and the Vice President's authority?

11 A I mean, I think that would be privileged attorney work product if I had
12 conversations with him about it.

13 Q Okay. Well, I'll put it like this, and just to make the record, I mean, the fact
14 that he has had conversations and written these memos is very public, including what he
15 says was I believe a waiver by the President for him to talk about certain issues related to
16 this.

17 So just the mere fact, all I'm asking is whether you ever talked to him about issues
18 that are already made public, not the substance of what you got into?

19 A Whether I talked to him about those issues is not public. So my role in it is
20 not public. So, I mean, I don't think I can talk about it.

21 Q Okay. All right. So you think that would be privileged if you did or did not
22 talk to Mr. Eastman about his views of the Vice President and the joint sessions, without
23 getting into the substance of your conversation?

24 A I think so. I mean, Joel, feel free to chime in, in but --

25 Mr. Sibley. I think as long as there's not -- as long as we have a stipulation that it

1 won't result in some kind of subject matter waiver entirely for her to answer the question
2 of whether or not she had a conversation on the general topic of Professor Eastman's
3 theories regarding the Vice President's ability to send the election back to the states,
4 whatever the general gist of those memos are, I think that's okay.

5 [REDACTED] Yeah. And I will stop there. I'll represent to you that I'm not
6 going to ask further if you did have such conversations, what those conversations were.
7 So I will stop there.

8 Ms. Bobb. What's the relevance of the question then? Why does it matter if I
9 talked to him.

10 BY [REDACTED]

11 Q Well, respectfully, Ms. Bobb, the relevance is for us to determine, not you as
12 the witness. So I'm just trying to ask a question while respecting the contours of
13 information that's not public or any privileged conversation you may have had.

14 A I had privileged conversations with John Eastman. Yes.

15 Q Okay. And those conversations that I'm focused on before January 6. I'm
16 not interested in anything after January 6.

17 A Right.

18 Q So it was conversations that you just mentioned would have happened
19 before January 6?

20 A I've had both. I've had -- well, yeah, I've had both.

21 Q Okay. Please show Exhibit Number 48, please.

22 This is an email. You did not provide this to us. It's from somebody named Ivan
23 Raiklin to a number of White House recipients with a memo that he titled, or apparently
24 titled Operation Pence Card, around December 22 or December 23.

25 Do you know who Ivan Raiklin is?

1 A I do.

2 Q Did you have any interactions or communications with him after the election
3 and up through January 20, 2021?

4 A No. I had no idea what he was even involved in this, so -- okay.

5 Q You know Ivan Raiklin. Who do you know him to be?

6 A I don't know how I would describe him. He's -- he like travels in
7 conservative circles and like pushes the conservative agenda. Like I don't really know
8 what his role or is or what he does. He's kind of like a -- like he goes to everything, you
9 know, but I don't -- I don't know who he works for or what he does. Maybe he's a
10 consultant or something.

11 Q Not aware of his efforts related to the joint session of the Vice President
12 before January 6?

13 A Correct. This is the first I'm seeing of it. I didn't know about this.

14 Q And haven't otherwise heard about what he was doing with respect to the
15 joint session before?

16 A Correct.

17 Q All right. If we can pull up Exhibit Number 50. This is a bullet point list,
18 understanding it was created by John McEntee related to the Vice President and his
19 authority at the joint session.

20 Are you aware of anything John McEntee did with respect to the joint session?

21 A No.

22 Q Have you ever seen this bullet-pointed memo before?

23 A No.

24 Q If we could pull up -- before we get there, there's a lawsuit filed called
25 Gohmert versus Pence. Louis Gohmert filed it with a number of other people versus

1 Vice President Pence.

2 What, if any, was the Rudy's team, the legal team's role in the lawsuit that
3 Mr. Gohmert filed?

4 A I don't know anything about it.

5 Q And what about Texas versus Pennsylvania? That was a lawsuit filed by the
6 attorney general of Texas, Ken Paxton, against Pennsylvania and other state. Are you
7 aware of that lawsuit?

8 A -- aware of that lawsuit, but obviously we didn't have a role in it, at least not
9 to my knowledge. If Rudy talked to General Paxton maybe, but I'm not aware of that.

10 Q But you had no role in helping drafting any complaints or any other
11 pleadings?

12 A No.

13 Q Pull up Exhibit 55, please. This is a document you provided to us. If you
14 go to the bottom of page 1, it's from you to somebody named Kevin Daniel Bishop as well
15 as well as Richard Perry, and the subject is voting irregularities.

16 You say, Good afternoon, gentlemen. Per Senator Graham's request, I've
17 attached a memo with a sample of traditional voter fraud. Please let me know if you
18 have any questions.

19 And then you send it roughly a half an hour later to Ms. Michael, saying that Chief
20 of Staff Meadows requested a copy of the memo that we sent to Senator Graham. It's
21 attached here. Can you please print it for Mr. Meadows. And Professor Eastman is on
22 his way.

23 Do you remember this email?

24 A Vaguely. This is what I was saying when you were talking about Katherine's
25 email, I was like, oh, I had sent a memo as well. I guess we just duplicated work and

1 didn't know it.

2 Q This says Chief of Staff Meadows requested a copy of the memo. When
3 and how did he request that?

4 A I don't remember when and how he requested it. Senator Graham -- it was
5 in Meadows' office that Senator Graham requested the memo. So this is probably the
6 courtesy copy to Meadows to let him know like, hey, per that conversation that we had in
7 your office; this is what we sent to him.

8 Q This also says, you say, Professor Eastman is on his way.

9 A Yeah. We had a meeting with -- I think it was with Pence on the fourth,
10 didn't he.

11 Q You tell me. Is that what you recall that Professor Eastman was meeting
12 with Pence?

13 A I think. I thought he had one. He met with him at some point. I thought
14 it was like the fourth or fifth, but if I said that Professor Eastman is on his way,
15 that's -- that's what I take -- I don't remember what I meant at the time, but reading it
16 sitting here makes me think he was on his way to the White House.

17 Q Did you ever learn about what happened in that meeting between Professor
18 Eastman and Vice President Pence on the fourth?

19 A Yeah. I mean, Eastman put it on his website, so it's public.

20 Q All right. So tell me about it. What did you hear about it?

21 A Well, I mean, I -- sorry. There's a fly on my end.

22 Been a while since I read what he posted, but the best of my recollection was that
23 he was explaining to Eastman -- or, I'm sorry, Eastman was explaining to Pence that he
24 had the constitutional authority to allow the state legislatures more time to ensure that,
25 you know, they certified the right electors or whatever, and all he has to do is send it back

1 the states. And Pence didn't want to. Something like that.

2 Q And did you hear about that conversation from Mr. Eastman as well?

3 A I don't think so. I don't know. I didn't work -- like Eastman and I know each
4 other, and we would say we worked together on Rudy's team efforts, but we weren't like
5 we didn't do a lot together.

6 Q Kevin Daniel Bishop, is that somebody who you know to work for Senator
7 Graham?

8 A Probably. That's probably who they told me to send the memo to.

9 Q Did you recall any follow-up that you got from Senator Graham or his office
10 regarding what you --

11 A No.

12 Q -- sent over?

13 A I don't think they even acknowledged receipt.

14 Q We go to page 3 of this exhibit, this is an attachment to this email that you
15 sent to Senator Graham and then along to Ms. Michael.

16 Do you recognize what this is?

17 A That looks like -- is that from Arizona? I don't --

18 Q I believe it is.

19 A Yeah. That looks like the number of over votes for precinct, but those
20 don't look like precincts. I don't remember exactly what that is.

21 Q Do you remember where you got this information from, this over-vote data?

22 A Arizona GOP.

23 Q Did you say Arizona GOP?

24 A Yeah.

25 Q Did you do anything to look into this information that Arizona GOP gave

1 you?

2 A I don't think so. I think Arizona GOP got it from the counties. Like I think
3 that this was like the official county -- I don't remember. I mean, I don't remember, but
4 I don't think this was -- this -- I do not believe -- and I did not believe at the time that it
5 was something that the Arizona GOP created. I think they had the information.

6 Q And if you go to page 38, same Exhibit 55, this is another attachment to the
7 email that you sent to Senator Graham and then on to Mr. Meadows. This is a expert
8 witness designation followed by a report by Jesse Kamzol.

9 Do you recognize this?

10 A Yeah. I mean, I remember this. I don't remember the exact document,
11 but yes.

12 Q And do you remember why you sent it to Senator Graham and Mr.
13 Meadows?

14 A They wanted information on where -- well, I would have sent it to Meadows
15 because I was cc'ing, letting him know what we sent to Graham, but Graham had asked
16 for information on the evidence that we were finding.

17 I'm sorry. The document is behind the picture, so I can't see the caption.

18 [REDACTED] Yes, of course. If you zoom out a little bit that might help, [REDACTED]

19 Ms. Bobb. So, so was that his affidavit? Because I remember there was an
20 affidavit in Nevada that had a lot of really good information in it. I thought that was it
21 but the caption doesn't look like an affidavit.

22 BY [REDACTED]

23 Q Yeah. So this is a designation of expert witness, Jesse Kamzol. And then if
24 you go to page 41, there's a report.

25 A Yeah.

1 Q Of Kamzol.

2 A Okay. I don't remember that part of it. Maybe this was the precursor to
3 his affidavit, but he has an affidavit where he like explains everything that he analyzes, so
4 this must have been a precursor to it.

5 Q Okay. So in this case, I'm just asking if you are aware, in this case of Law
6 versus Whitmer, the court considered Mr. Kamzol's information in his affidavit and found
7 that his expert report was unreliable because it had little to no information about or
8 supervision over the origins of his data, the manner in which it had been matched, and
9 what the rates of false positive would be, and that there was little or no verification of his
10 numbers. That from the court came out in December of 2020.

11 Did that affect at all from your consideration or the legal team's consideration of
12 Mr. Kamzol's affidavit or report about this information?

13 A No, I'm not -- I don't have a specific recollection about that. I can't say. I
14 don't know. It -- as I sit here, I don't remember being affected by that.

15 Q Were you aware that the court did find that his affidavit was unreliable?

16 A I don't specifically remember that, but I knew that there were a lot of -- I
17 knew that we were struggling to get our evidence admitted. So, I don't specifically
18 remember his but, you know, I was probably aware of it. Doesn't surprise me.

19 Q If we go to Exhibit 56, this is an email chain first from Jason Miller at the
20 bottom, if you scroll down a bit. Its subject line is Tweets. Jason Miller is asking you, it
21 looks like, for a series of tweets about various states on January 6 in the morning.

22 Do you remember that?

23 A Vaguely. I mean, I'm looking at it, so yes, but I probably wouldn't have
24 recalled it without the email.

25 Q Why were you asked to draft tweets about Wisconsin, Arizona, Georgia,

1 Pennsylvania and Michigan on January 6?

2 A I mean, I don't know. You would have to ask Jason. But I had information
3 about it, so it's probably why they asked that. I don't know.

4 Q Okay. And if you look at the top one in response to his request for
5 Michigan, you talk about precincts out of balance. A forensic exam showed a 68 percent
6 error rate. And then you say hashtag 10 more days, which also appears on some of the
7 others.

8 Is that hashtag 10 more days, what's that?

9 A In reference to the request from the states to have 10 more days to
10 reconsider their electors.

11 Q And do you remember other than yourself -- well, including yourself, but I
12 think we already talked about it, anybody on the legal team encouraging states to ask for
13 10 more days as opposed to just being the recipient of a request like that?

14 A We did already discuss this, and no. I don't know. I don't know. It
15 wouldn't have been out of the question. It would have been a long narrative that we
16 were doing, but I don't remember a specific effort to do that.

17 [REDACTED] Okay. I'll pause there briefly. Do you have any follow-up on
18 that?

19 [REDACTED] Not right now.

20 BY [REDACTED]

21 Q Okay. As far as the events of January 6, did you have any role in planning
22 or preparing for any rallies on January 6 in Washington?

23 A No.

24 Q Mr. Giuliani gave a speech, as did Mr. Eastman. Did you have any role in
25 preparing their remarks?

1 A No.

2 Q Were you ever aware in that period after the election and up through
3 January 6 of any discussions about encouraging people to go to the Capitol on January 6
4 to protest or otherwise?

5 A No.

6 Q Were you ever aware of any desire, intention, plan to hold an event at the
7 Capitol on January 6, whether it was the President himself or anybody else?

8 A I remember talks about it like from the media. I remember something
9 about like I knew the people were coming to DC, but I don't remember much more than
10 that. And whatever I knew would have been from open source.

11 Q Did you ever hear anything about the potential for violence on January 6?

12 A No.

13 Q Did you ever hear anything about the potential that people would try to
14 storm the Capitol or get inside the Capitol on January 6?

15 A No.

16 Q On January 6, or by January 6, I should say, what was your expectation as to
17 the likelihood of success -- of now President Biden not being certified the winner?

18 A I wasn't looking at it like that. I was looking at it like what was Pence going
19 to do and was -- the question in my mind was does Pence have the backbone to give the
20 states more time. I wasn't looking at it as who's going to be the next President. I
21 wanted to know if there was a Republican leader who didn't kowtow to the swamp.
22 And the answer was no. Mike Pence was a coward.

23 I think he should have sent the -- so that was the question in my mind is does
24 Pence have what it takes to actually do -- like stand up to the woke mob? Nope. He
25 sure doesn't. So that was the issue for me.

1 Q Of course that's never been done in history before, right? What Mike
2 Pence was being asked to do that day has never been done before, correct?

3 A Correct.

4 Q Okay. And what about --

5 A Correct, well -- sorry. Go ahead.

6 Q What about the members? I mean, there are Republican members of
7 Congress as well who could object and gather. Did you expect that their objections
8 would have any effect in the joint session that day?

9 A I didn't think the objections would have. If Pence -- my whole expectation
10 was this. If Pence sent the vote back, what the states would do. I thought that the
11 legislative members of Congress should object, and many of them did. Pennsylvania
12 had a record number of objections. So, yeah, I thought they should have objected, but I
13 didn't actually expect their objections to do anything.

14 I mean, you know, that happens every election. Democrats object every time.
15 There's a Democrat that objects every time a Republican wins and vice versa. That's just
16 part of the process.

17 Q Do you know who Eric Herschmann is?

18 A I don't know. Kind of sounds familiar, but I can't place him.

19 Q White House employee, he's also a lawyer. He's a New Yorker.

20 A I don't know him.

21 Q Okay. The reason I was going to ask is Mr. Giuliani had a call with him that
22 morning, and I was wondering if you were aware of that?

23 A Not particularly.

24 Q Okay. And without getting into the substance, are you aware of what
25 Mr. Giuliani spoke with the President about that morning on January 6 before the rally?

1 A With the press?

2 Q The President.

3 A I have no idea.

4 Q Were you at the rally on the Ellipse when the president spoke?

5 A No. I was at the Capitol. I was reporting from Cannon.

6 Q What was happening in Cannon at that point, if anything?

7 A Absolutely nothing. It was completely dead. I had no idea what was
8 going on because I was watching the speech on the iPhone or iPad or whatever. And as
9 a reporter, you try to get members of Congress to give you a sound byte or something,
10 and there weren't even any walking the halls.

11 I scheduled an interview with Mike Kelly, so I got that interview. And then it was
12 dead and there was like 20 reporters with their crews standing around twiddling their
13 thumbs. So I told my crew I'm going to step outside and see if there was anybody.
14 And Trump was still speaking at this point. I was like I'm going to just step outside and
15 see if there's anybody worth interviewing.

16 And when I stepped outside, there was a lot more people on the grass than in
17 Cannon. There was nobody, you know. And so I called my crew and I was like, hey,
18 why don't you guys come outside and we'll do like man-on-the-street interviews with
19 people out front.

20 And in the 10 minutes that it took me to get from the Cannon rotunda to the
21 grass, my crew was like, uh, they are locking the press in the basement in Cannon. So I
22 didn't have a camera crew or anything, which is why I went to the Willard because I
23 couldn't -- I did a few things on social media, but I lost my crew. So I just went to the
24 Willard.

25 Q Okay. If we could go to 57, and start on page 3 of Exhibit 57, I think this is

1 going to be exactly what you just talked about, Ms. Bobb.

2 A Okay.

3 Q This looks like a tweet that you sent out from the Cannon rotunda. So this
4 is before the attack on the Capitol started, right? You are in the Cannon rotunda.

5 A Um-hmm.

6 Q Do you remember sending this out?

7 A I mean, yeah, vaguely. I remember I was tweeting from the rotunda. I
8 don't remember what I said, but yes, I remember doing it.

9 Q Okay. And then if you go up, the next page, looks like you had a number of
10 tweets that you responded to. And then you post something on January 6 that says,
11 Happening now, storm clouds over the Capitol.

12 Is that footage or a photo that you took --

13 A Yeah.

14 Q Okay. And then it looks like if you go up, you say, Heading to the Capitol.
15 I think this occurs later in time than the picture we just looked at. So are you at this
16 point moving away from the Capitol and towards the Willard?

17 A Yeah. I was -- when I said heading to the Capitol, I was referring to the
18 people that were going, because I started at Cannon so I was walking against the crowd.

19 Q I see. And then you say, Press at Cannon are being evacuated. I think you
20 just mentioned that with respect to your camera crew, right? Okay.

21 A Yeah.

22 Q And then you say, Where's at Mike Pence. And the Tweet above that is At
23 Mike Pence can solve this now by sending it back to the legislators.

24 What did you mean by those two tweets?

25 A Exactly what I said, and what I was saying to you. In my mind, the question

1 of the day was would Mike Pence send the elector -- slate of electors back to the states to
2 ask for either clarification or reconsideration. That, I mean, that was the question of the
3 day for me.

4 Q And when you say, At Mike Pence can solve this now by sending it back to
5 the legislature, what could he solve?

6 A If he -- my thought process is if he sent it back to the legislators, forcing the
7 legislators to either confirm their original vote or replay, whatever, it would just confirm
8 what the states wanted. I think the question was -- the question in my mind at least was
9 there was a lot of concern that election officials and potentially malicious actors in the
10 states certified the wrong votes.

11 And so if you send it back to the states and force the states to take a look, and if
12 they -- if they decided to keep their vote, okay, fine; but at least, you know, at least you
13 forced the issue. Without doing that, I think a lot of people -- I think a lot of people feel
14 that they were disenfranchised in the election.

15 Q And when you say he can solve this now by sending it back, are you talking
16 about the violence at the Capitol, like that would help quell the violence?

17 A No. There was no -- I did not -- like I saw violence. Like I said, the doors
18 hadn't been opened yet so there was no actual breach, but I didn't see violence at the
19 Capitol when I was there. I saw like holes that I thought the police would be, you know,
20 but I didn't -- I never thought -- like you can see I didn't even tweet out anything violent at
21 the Capitol because I didn't think there was any violence at the Capitol. It was that
22 small.

23 So, I mean --

24 Q And we don't have the time stamps on here, so I'm just going to ask you, do
25 you remember sending this tweet while you were walking back or once you had already

1 returned to the Willard?

2 A Oh, that's weird. Why aren't there time stamps? Do you know?

3 Q I don't know the answer to that, but do you remember whether you sent
4 those, particularly those last two tweets we've been talking about, once you got back to
5 the Willard?

6 A No. I think the ones -- I mean, I don't think I tweeted from the Willard. I
7 think the ones would have been the ones at the rotunda. I don't remember specifically,
8 but I don't think I tweeted at all from the Willard.

9 Q Okay. If we go to Exhibit 58. This is one of the tweets we looked at
10 earlier that you sent out. And it looks like it's a retweet of somebody else.

11 A Okay.

12 Q And I believe that's an image from the movie The Patriot, with respect to the
13 Revolution?

14 A Did I retweet that? I didn't retweet that. Somebody else, whoever, that
15 looks like a Cyrillic something tweeted. I didn't tweet that out.

16 Q Okay. So you don't remember -- it's unclear to me, because it says
17 Christina Bobb retweet, but that's why I'm asking the question.

18 A No.

19 Q Do you remember a retweet?

20 A I mean, that lists -- I can't read -- is that Cyrillic? Or I don't even know what
21 language that is.

22 [REDACTED] I can represent to you that it is Greek. It is an archived capture
23 of the Twitter account from the day of.

24 Ms. Bobb. Okay.

25 [REDACTED] And my understanding of this, although you are obviously

1 welcome to correct me if it's inaccurate, is that this user, Dan30, posted this image, and
2 that you retweeted it. And then that's what the retweet symbol and then the Christina
3 Bobb retweets.

4 Ms. Bobb. Okay.

5 [REDACTED] Like at the top.

6 Ms. Bobb. It's fuzzy on my end, but, okay, if that's what happened. Fine.

7 [REDACTED]

8 Q If this is a retweet, why did you think that January 6 would be -- if you did,
9 how is this relevant, the Patriot, Revolution 1776? Why was that relevant to what was
10 happening on January 6?

11 A Wow. Because from my perspective we had an illegal election. I believe
12 wholeheartedly that not just Democrats, I think it was Democrats in conjunction with -- I
13 think it was the swamp. The swamp rigged and stole the election and the American
14 people lost their voice. And so I think it's very appropriate to hope that President
15 Pence, Vice President Pence will send the votes back to the states, but I think as it stands I
16 think we are in a really bad spot as a country. I do.

17 Q And I hope you can appreciate this. I mean, one of the things we are
18 looking at is what happened in the Capitol, the violence at the Capitol. And so what you
19 retweeted here, if that's what this is, is an image of violence, of war, of 1776.

20 So did you think that violence was necessary or appropriate on January 6, 2021,
21 with respect to the joint session of Congress?

22 A I can't believe you are honestly asking me these questions. There's nothing
23 about my social media account that calls for violence or that asks for violence. I've
24 never done anything violent. I've never called for violence from anybody.

25 So the idea that I retweet a picture from The Patriot, if that's even in fact what

1 happened, I don't even remember doing that. It looks like my name is in the thing, but it
2 doesn't say Christina Bobb retweeted. It says re, re, re, Christina Bobb, re-retweeted. I
3 don't even know that's me, but maybe it is, but -- no. Absolutely not.

4 I would never call for violence. I never expected violence and was very
5 saddened. And I'm really, really saddened by what's happening with our country right
6 now. I think Democrats have completely destroyed it. It's really, really disgusting, and
7 I think this inquisition is disgusting. That's what I think.

8 Q Understood. And that is now on the record, Ms. Bobb. I'm just asking the
9 questions, only because, you know, we are looking at certain images, and I'm trying to
10 understand it. So I -- and that's why we want you to explain it?

11 A So let me ask you this, because you are investigating the
12 violence -- supposed violence at the Capitol, right? Right? That's what you guys are
13 supposed to be doing. This is what this committee is for.

14 Q That's precisely right. We are looking into the events of the attack at the
15 Capitol?

16 A Then why aren't you looking into the police officers, and why aren't you
17 looking into the fact that they did not use the proper protocol for the use of force, the
18 escalation of force? Why aren't you looking into the fact that they opened the gates,
19 that they removed the barricades?

20 Why aren't you looking into the fact that the FBI had an informant and they are
21 instigating? Why aren't you looking into the fact who were those FBI informants and
22 what was federal law enforcement doing trying to instigate people to go into the Capitol?
23 Why aren't you looking at that? You are looking at my Twitter account that maybe or I
24 may or may not have retweeted some guy who writes in Greek.

25 Look at the actual facts of what happened. What happened was really

1 dangerous. Why is it the Democrats refused the assistance that President Trump
2 offered to reinforce with either National Guard or additional troops from DOD? Those
3 offers were turned down. Why? Why?

4 Like the -- it makes no sense. The stuff that happened at the Capitol could easily
5 be investigated, but like why are you only investigating conservatives? It's like why
6 aren't you looking into how did the violence of 2020 lead up to it. This is a completely
7 one-sided partisan investigation. It's disgusting. And there are people sitting in jail
8 who do not deserve to be in jail because this is a political witch hunt.

9 Q Ms. Bobb, that's your perspective. We are just asking questions. We are
10 trying to get to the bottom of it, and you'll see what the committee did when all the
11 information comes out from the commit eventually but, you know, you are a witness, a
12 fact witness to certain events.

13 And I've appreciated your time in answering our questions here today, but that's
14 why we ask the questions is to get an understanding of what they are.

15 A You didn't ask me what I saw at the Capitol. I just told you I was at the
16 Cannon rotunda and I went out onto the grass and I saw what was out there. And I saw
17 that the police were not using the proper protocols, and they were not preparing the
18 people that the amount of people were actually trying to get the bad actors to stop.
19 That's what I saw.

20 And why aren't you asking more about that, but you want to hear about some
21 retweet from who knows. I can't even read the guy's name.

22 Q I think you have said all of that earlier today. And I appreciate your
23 perspective that you offered on what you saw and heard at the Capitol and elsewhere on
24 January 6.

25 At this point, I do think that we have reached the end. I'll defer to -- do you have

1 any other questions?

2 [REDACTED] Not about the day of the 6th. No.

3 [REDACTED] Do you have other questions for Ms. Bobb?

4 [REDACTED] I don't think so.

5 [REDACTED] Okay. Mr. Sibley, is there anything that you would like to add
6 before we go off the record?

7 Mr. Sibley. No.

8 [REDACTED] All right. Ms. Bobb, is there -- I understand that you have just said
9 a lot and your thoughts on what Congress should be looking into.

10 Is there anything else that you would like to add before we end today's session?

11 Ms. Bobb. I think you need to be looking into the real facts of January 6. I think
12 you need to be looking into the real facts of the election. I think you need to stop using
13 your political authority against your political opponents. You have turned the
14 government against the people, and I think it's disgusting.

15 [REDACTED] If there's any documents that you have that we have gone over or
16 that you recall from today or that -- excuse me, you recall exist today that you hadn't
17 otherwise looked for or found, I would appreciate it if you could get with Mr. Sibley and
18 discuss that, and then Mr. Sibley and I could have a conversation. If there's not, that's
19 fine too, but at this point I do think we are finished for the day and we can go off the
20 record.

21 [The interview was concluded at 5:07 p.m.]

2

3

4 I have read the foregoing ____ pages, which contain the correct transcript of the
5 answers made by me to the questions therein recorded.

6

7

8

9

10 Witness Name

11

12

13

14

Witness Name

15

Date