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

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11 DEPOSITION OF: BIANCA GRACIA
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15 Thursday, April 7, 2022

16
17 Washington, D.C.
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20 The deposition in the above matter was held via Zoom, commencing at 9:58 a.m.

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2 Appearances:

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5 For the SELECT COMMITTEE TO INVESTIGATE

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

7

8 [REDACTED], PROFESSIONAL STAFF MEMBER

9 [REDACTED], INVESTIGATIVE COUNSEL

10 [REDACTED], CHIEF CLERK

11 [REDACTED], INVESTIGATIVE COUNSEL

12 [REDACTED], INVESTIGATIVE COUNSEL

13 [REDACTED], SENIOR TECHNICAL ADVISOR

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16 For THE WITNESS:

17

18 LAURIN MILLS

1

2 [REDACTED] And so we're on the record at 9:58 a.m.

3 Good morning. This is the deposition of Bianca Gracia, conducted by the House
4 Select Committee to investigate the January 6th attack on the United States Capitol,
5 pursuant to House Resolution 503.

6 This deposition is being conducted via Zoom. This will be a staff-led deposition,
7 though Members may choose to join the Zoom call and ask questions.

8 At this time, I'd ask the witness to please state your full name and spell your last
9 name for the record.

10 The Witness. Bianca Gracia, G-r-a-c-i-a.

11 [REDACTED] My name is [REDACTED]. I'm an investigative counsel with the
12 Select Committee. There are no other staff from the Select Committee on the call right
13 now and no other members, but if people choose to join, I'll try to announce them as they
14 come in so that you know who's in the room.

15 The Witness. Okay.

16 [REDACTED] And then I'd also ask at this time for counsel for Ms. Gracia to state
17 his name for the record.

18 Mr. Mills. Good morning. It's Laurin Mills for Ms. Gracia. And as we
19 discussed before, make a short statement. Ms. Gracia is appearing here, respecting the
20 committee's authority here to subpoena her.

21 However, in light of comments made by the Attorney General and the Deputy
22 Attorney General, and by the committee and filings in the Central District of California
23 and by a judge in the Central District of California, she has opted to invoke her rights
24 under the Fifth Amendment, not to be a witness against herself.

25 And so after you swear her in, every answer she's going to give is, I rely on my

1 Fifth Amendment privilege. And that's how we will proceed. And are you okay with
2 that shorthand, [REDACTED]?

3 [REDACTED] That's -- yeah, that's going to be fine. I'll have a few kind of
4 clarifying statements once we get started as well, but, yeah, we can go with shorthand
5 after the first invocation.

6 You know, actually, if you can just give me one second while a staff member is
7 trying to join the call.

8 Mr. Mills. Okay.

9 [REDACTED] Okay. All right. Thank you for that, Mr. Mills.

10 So under House deposition rules, neither committee members, nor staff, may
11 discuss the substance of the testimony today, unless the committee approves for release.

12 And then also note under House rules, you may have your attorney present, which
13 obviously you do, but counsel for other individuals, or attorneys for other government
14 agencies may not be present and are, therefore, not present today.

15 And then I'll also note for the record, that we've had [REDACTED] join.

16 He's another investigative counsel with the Select Committee.

17 What has been previously marked as exhibit 1 is the Select Committee's January
18 19, 2022 subpoena for Ms. Bianca Gracia. The House deposition rules are included in
19 that exhibit.

20 We've also had a couple more individuals join. We've had [REDACTED],
21 investigative counsel for the committee, and [REDACTED], who's a consultant with
22 the committee and on the committee staff as well.

23 So, Ms. Gracia, there's an official reporter that's transcribing the record of this
24 deposition. So to make her job a little bit easier, if you can just wait until I complete my
25 questions before you begin your response. We'll try to wait -- and then I'll also try to

1 wait until you've completed your answer before I begin my next question.

2 It's just difficult for the court reporter to try to transcribe two people speaking at
3 the same time. Does that make sense?

4 The Witness. Yes.

5 [REDACTED] Okay. And then along the same lines, you need to use verbal
6 responses today, as opposed to, like, a head shake. So just make sure that you try to
7 use yes or no or a similar answer when I ask a question.

8 And then also today, all we ask is that you provide complete answers to the best
9 of your recollection. If a question is not clear, please ask for clarification or ask me to
10 restate it. And if you don't know the answer, you can simply say so.

11 The Witness. Okay.

12 [REDACTED] Also note, and Mr. Mills has already addressed for the record, that
13 you may refuse to answer a question to preserve a privilege recognized by the select
14 committee, privileges like the Fifth Amendment right against self-incrimination.

15 If you refuse to answer a question based on a privilege, staff may either proceed
16 with the deposition or seek a ruling from the chairman on the objection. If the chairman
17 overrules such an objection, you'll be required to answer the question.

18 And then, I also want to remind you that it's unlawful -- and we provide this
19 warning for everybody we speak to -- that it's unlawful to deliberately provide false
20 information to Congress.

21 Providing false information could result in criminal penalties for perjury or false
22 statements, including under 18 U.S.C. 1001, which makes it illegal to provide a false
23 statement to an congressional investigator like myself, or some of the others that I've
24 announced on this call. Does that all make sense to you?

25 The Witness. Yes.

1 [REDACTED] That being said, I want to make clear that this is a congressional
2 investigation and not a criminal investigation. This proceeding is separate and distinct
3 from any current criminal proceeding by the United States Department of Justice. Do
4 you understand that?

5 The Witness. Yes.

6 [REDACTED] Okay. And then throughout today and throughout our
7 conversation, if you need any breaks, just let me know. I'll try to take a break about
8 every hour or so, but if you need one at a different time, feel free to say so.

9 The Witness. Okay.

10 [REDACTED] And then, I'll mostly be leading our conversation today and asking
11 most of the questions, but occasionally, other staffers or a member might join the
12 discussion and ask a follow-up question for you, so that may occur.

13 And then lastly, because this is a deposition, you are -- or you will be under oath.
14 So could you please raise your right hand to be sworn.

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

18 The Witness. I do.

19 The Reporter. Thank you.

20 The Witness. Yes.

21 [REDACTED] Great. And then to start, sort of a housekeeping matter, I'm going
22 to pull up exhibit 1, which you should be able to see on your screen now. Can you see
23 that?

24 The Witness. Yes.

25 [REDACTED] Okay. And this is the January 19, 2022 subpoena issued to you by

1 the select committee. Have you seen this document before?

2 The Witness. Yes.

3 [REDACTED] Okay. And I'll note, obviously at the top of there, we've got Bianca
4 Gracia, and I just want to confirm that you're the individual named in this subpoena. Is
5 that correct?

6 The Witness. Yes.

7 [REDACTED] Okay. Great. And then I'm scrolling down to page 5 of this
8 document, which is a schedule of documents requested in the subpoena. Have you
9 seen this document schedule before?

10 The Witness. Yes.

11 [REDACTED] Okay. And am I right that in response to the subpoena, which calls
12 for the production of documents, you've produced no documents, correct?

13 Mr. Mills. I'm going to -- we have already asserted the act-of-production
14 privilege with regard to that.

15 [REDACTED] Sure. And just as an initial matter, you know, I'm going to need
16 Ms. Gracia to assert those privileges on the record. So really just a housekeeping matter
17 to get her to put that on the record.

18 Mr. Mills. So, Bianca, you can say, I rely on my Fifth Amendment privilege.

19 The Witness. I rely on my Fifth Amendment privilege.

20 [REDACTED] Okay. And then also as an additional matter, I just want to make
21 sure -- I'm sure you've had conversations with Mr. Mills about this, but I want to make
22 sure you understand what it means to invoke the Fifth Amendment privilege.

23 And so, I hope that you understand that by invoking the Fifth Amendment right
24 against self-incrimination, you're indicating that you believe that truthful answers to my
25 question would be incriminating.

1 Mr. Mills. I object to that characterization. The Fifth Amendment says nothing
2 about incrimination. It says she has a right not to be a witness against herself. And
3 that's the objection. So that's the privilege she's asserting.

4 [REDACTED] Do you understand that by providing truthful answers to these
5 questions and invoking the Fifth Amendment right, that you believe that the answers to
6 your questions could be used against you in a criminal case?

7 The Witness. I rely on my Fifth Amendment privilege not to be a witness against
8 myself.

9 [REDACTED] Okay. And it's also your position that collecting documents and
10 producing documents would also amount to being used as a witness against yourself? Is
11 that the case?

12 The Witness. I rely on my Fifth Amendment Privilege not to be a witness against
13 myself.

14 Thank you.

15 EXAMINATION

16 BY [REDACTED]

17 Q I'd like to start this with some background questions. If you can tell me,
18 where do you currently live?

19 A Houston, Texas.

20 Mr. Mills. Bianca?

21 The Witness. Uh-huh.

22 Mr. Mills. You know, just stick with your privilege.

23 The Witness. Okay, thank you.

24 I rely on my Fifth Amendment privilege.

25 BY :

1 Q And what is your occupation?

2 A I rely on my Fifth Amendment privilege.

3 Q I'm going to ask you a series of questions. We'll go through some kind of
4 introductory questions, and I'll have you invoke your Fifth. I might ask some clarifying
5 questions to understand the scope of your Fifth Amendment objection and also
6 understand the basis for it. So -- but first, I would like to answer some questions about
7 your involvement in the organization Latinos for Trump. Are you the founder of Latinos
8 for Trump?

9 A I rely on my Fifth Amendment privilege.

10 Q Okay. Can you tell me what the purpose of that organization is?

11 A I rely on my Fifth Amendment privilege.

12 Q Does the organization still exist?

13 A I rely on my Fifth Amendment privilege.

14 Q Okay. Is it going to be -- or is it your intention to invoke the Fifth
15 Amendment for any and all questions related to your involvement with the organization,
16 Latinos for Trump?

17 A I rely on my Fifth Amendment privilege.

18 Q Okay. I also want to ask some questions about are there other individuals
19 that are related to Latinos for Trump or may have had some involvement with that
20 organization. So first, I'll ask, do you know Mr. Enrique Tarrio?

21 A I rely on my Fifth Amendment privilege.

22 Q Do you know an individual named Mr. Thad Cisneros?

23 A I rely on my Fifth Amendment privilege.

24 Q Okay. Would it be your intention today to invoke the Fifth Amendment
25 with respect to any questions about other individuals' involvement in Latinos for Trump?

1 A I rely on my Fifth Amendment privilege.

2 Q Okay. Let's move towards some questions and topics related to planning
3 for January 5th and 6th. Could you tell me, or to start from a high level, what is
4 your -- or what was your involvement in obtaining any permits for the events on January
5 5th and 6th?

6 A I rely on my Fifth Amendment privilege.

7 Q Okay. Do you know of an organization called Virginia Freedom Keepers?

8 A I rely on my Fifth Amendment privilege.

9 Q Okay. I have a series of questions about the permitting process and
10 permits you may have been involved in obtaining, either through Latinos for Trump or in
11 relation to the Virginia Freedom Keepers.

12 Is it your intention to invoke the Fifth Amendment with respect to all questions
13 about permitting or planning for the events of January 5th and 6th?

14 A I rely on my Fifth Amendment privilege.

15 Q Okay. I also have a series of questions about other individuals involved
16 with Virginia Freedom Keepers that you may know or have interacted with in relation to
17 planning for the 5th or the 6th. So the first one is Marsha Lessard. Do you know
18 Marsha Lessard?

19 A I rely on my Fifth Amendment privilege.

20 Q Okay. And how about Christina Skaggs, do you know Ms. Christina Skaggs?

21 A I rely on my Fifth Amendment privilege.

22 Q Okay. There are a number of other individuals that you may have been
23 familiar with or worked with in relation to planning for the 5th and the 6th. I'm going to
24 name those entities and if you could tell me if you're familiar with them and if you
25 worked with them for those purposes.

1 The first entity I want to address is Women for America First. Are you familiar
2 with that organization?

3 A I rely on my Fifth Amendment privilege.

4 Q Okay. How about Stop the Steal?

5 A I rely on my Fifth Amendment privilege.

6 Q Okay. And you know what, we can, just to make this easier for everybody
7 and for you, Ms. Gracia, if you want to just say "Fifth," that's fine with me.

8 How about coordination with Mr. Ali Alexander, do you know him, or have you
9 worked with him?

10 A I rely on my Fifth Amendment privilege.

11 Q Okay. And how about either Amy or Kylie Kremer, do you know either of
12 them?

13 A I rely on my Fifth Amendment privilege.

14 Q Okay. And leading up to the 5th and the 6th and planning for those days
15 and the events on those days, did you have contact with anybody in the White House for
16 planning any of those events?

17 A I rely on my Fifth Amendment privilege.

18 Q How about any Members of Congress, were you in contact with or did you
19 coordinate with any Members of Congress in relation to planning or attending events on
20 the 5th or the 6th of January?

21 A I rely on my Fifth Amendment privilege.

22 Q In your -- just continuing on the theme of kind of preparation and planning
23 for the 5th and the 6th. In your preparation and planning for those events, did you
24 consider any security threats or how to deal with them if they arose on that day?

25 A I rely on my Fifth Amendment privilege.

1 Q Okay. How about security threats posed by extremist groups that might've
2 been present in D.C. around that time?

3 A I rely on my Fifth Amendment privilege.

4 Q Okay. And I just want to clarify or state that I have a series of questions
5 about individuals who may have posed a security threat to you or your organization on
6 January 5th or 6th, and would it be your intention to invoke the Fifth Amendment with
7 respect to any security threats that you recognized or planned for on the 5th or the 6th?

8 A I rely on my Fifth Amendment privilege.

9 Q Okay. Then moving from sort of planning to your involvement, actual
10 involvement in and participation in events of that day, on January 5th, were you
11 involved -- did you attend any of the events on January 5th?

12 A I rely on my Fifth Amendment privilege.

13 Q Okay. Were you a speaker at any of the events on January 5th?

14 A I rely on my Fifth Amendment privilege.

15 Q I have a series of questions related to your attendance and participation in
16 rallies or events that were held on January 5th, 2021. Is it your intention to invoke the
17 Fifth Amendment to all of those questions?

18 A Yes. I rely on my Fifth Amendment privilege.

19 Q Okay. I'd like to ask you about another individual who was involved in
20 planning for events on January 5th. Her name is Cindy Chafian. Do you know
21 Ms. Chafian?

22 A I rely on my Fifth Amendment privilege.

23 Q I have a series of questions about your communications and interactions
24 with Ms. Chafian. Would it be your intention to invoke the Fifth for any and all
25 questions about your interactions with Ms. Chafian related to January 5th or 6th?

1 A I rely on my Fifth Amendment privilege.

2 Q If you did speak on January 5th, were you paid for your speech?

3 A I rely on my Fifth Amendment privilege.

4 Q Okay. And then, I also want to ask just some kind of logistical questions
5 about your trip to Washington, D.C. for January 5th and 6th, 2021. Where did you stay
6 while you were in Washington, D.C.?

7 A I rely on my Fifth Amendment privilege.

8 Q Okay. How long did you stay in D.C. when you were here for those events?

9 A I rely on my Fifth Amendment privilege.

10 Q Okay. Did anyone or any entity pay for any of your travel accommodations
11 for the 5th or the 6th?

12 A I rely on my Fifth Amendment privilege.

13 Q Okay. I have, again, a series of questions about just kind of the logistics of
14 your attendance at these events, where you stayed, who paid for those accommodations.
15 Would it be your intention to invoke the Fifth Amendment for any questions related to
16 your travel around January 5th and 6th?

17 A I rely on my Fifth Amendment privilege.

18 Q Okay. You've mentioned previously -- or I mentioned previously in this
19 deposition, Mr. Enrique Tarrio, and I just want to ask you a few questions about him and
20 how you know him and what your interactions with him have been.

21 So I'll start just generally, do you know Mr. Tarrio?

22 A I rely on my Fifth Amendment privilege.

23 Q Okay. I had some more specific questions about Mr. Tarrio and his
24 involvement in Latinos for Trump. Can you tell me what positions, if any, he's held in
25 the organization Latinos for Trump?

1 A I rely on my Fifth Amendment privilege.

2 Q We have collected documents and testimony from other witnesses who've
3 indicated that on November 13th, Mr. Tarrio flew with other Proud Boys from Miami to
4 Washington, D.C. for the rallies in D.C. on November 14th. Were you aware of this
5 flight?

6 A I rely on my Fifth Amendment privilege.

7 Q Okay. Did you help pay for this flight?

8 A I rely on my Fifth Amendment privilege.

9 Q If you did not pay for the flight, do you know who did pay for those flights to
10 D.C. on November 13th?

11 A I rely on my Fifth Amendment privilege.

12 Q Okay. Again, I have a series of questions about Mr. Tarrio's travel to
13 Washington, D.C. for the events of November 14th and your knowledge of payments for
14 those flights and other individuals that might've been on the flight.

15 Is it your intention to invoke the Fifth Amendment with respect to any questions
16 about the flight with Mr. Tarrio and other Proud Boys from Miami to Washington on
17 D.C. -- to D.C. for November 13th. Would you invoke the Fifth for all of those questions?

18 A I rely on my Fifth Amendment privilege.

19 Q Similarly, other witnesses and evidence that we've collected have indicated
20 that Mr. Thad Cisneros, who also has some ties to the organization Latinos for Trump, was
21 flown by private plane to Washington, D.C. for the events of January 6th. Were you
22 aware of this flight?

23 A I rely on my Fifth Amendment privilege.

24 Q Did Latinos for Trump help pay for that flight?

25 A I rely on my Fifth Amendment privilege.

1 Q Okay. Do you know an individual named Mr. Patrick Byrne?

2 A I rely on my Fifth Amendment privilege.

3 Q Okay. Do you know if he helped pay for either of the two flights that we've
4 just discussed, the November 13th flight to Washington, D.C. with Mr. Tarrio, and the
5 January 6th flight to Washington, D.C. with Mr. Cisneros?

6 A I rely on my Fifth Amendment privilege.

7 Q Okay. Is Mr. Byrne a financier, or does he contribute to Latinos for Trump?

8 A I rely on my Fifth Amendment privilege.

9 Q Okay. Again, I have a series of questions about Mr. Byrne and his relation
10 to the organization, Latinos for Trump. Would it be your intention to invoke the Fifth
11 Amendment with respect to any questions about Mr. Byrne and his relation to that
12 organization?

13 A I rely on my Fifth Amendment privilege.

14 Q Would you also invoke the Fifth with respect to any questions about Mr.
15 Byrne and his financing of the flights that we previously identified?

16 A I rely on my Fifth Amendment privilege.

17 Q Okay. I'd like to move to another topic. Also in advance of the events of
18 January 5th and 6th -- this is in December of 2020 -- did you visit the White House at any
19 time?

20 A I rely on my Fifth Amendment privilege.

21 Q Can you tell me, if you did visit the White House, what your reason for
22 visiting the White House was?

23 A I rely on my Fifth Amendment privilege.

24 Q Did Mr. Tarrio visit the White House with you for -- in that December visit to
25 the White House?

1 A I rely on my Fifth Amendment privilege.

2 Q Okay. And I have a series of questions about this White House visit in
3 December. Would it be your intention to invoke the Fifth Amendment with respect to
4 all questions about any visits you had to the White House in December of 2020?

5 A I rely on my Fifth Amendment privilege.

6 Q Okay. Did you or Mr. Tarrio meet President Trump during this visit?

7 A I rely on my Fifth Amendment privilege.

8 Q Okay. I would like to ask that she -- I'd like to ask some questions about
9 some other elected officials that you may have had contact with. So I'm going to pull up
10 what we've premarked as exhibit 3. And can you see this document? Are you able to
11 see this, Ms. Gracia?

12 Oh, I know that you're on your --

13 A Yeah.

14 Q -- on your phone, so it might be a little difficult to read. I can read to you
15 from the document, and if we need to provide a copy for you to view some other way, we
16 can try to do that. But what I'll represent to you is that these are phone records that we
17 have collected from T-Mobile related to your phone number, [REDACTED].

18 And I've, through those phone records, identified some specific calls I'd like to ask
19 you about. And if you can just tell me if you remember the phone call and remember
20 what the topic of discussion was on the phone call.

21 So first, I'd like to ask you about a November 24th phone call to Senator Cornyn's
22 office. Do you recall this phone call?

23 A I rely on my Fifth Amendment privilege.

24 Q And do you recall what you discussed with Senator Cornyn or his staff on this
25 phone call?

1 A I rely on my Fifth Amendment privilege.

2 Q Okay. I'd also like to look at a series of phone calls from November 30th
3 from your phone to -- two calls to a White House landline and two calls to a White House
4 cell phone. Do you recall phone calls on November 30th to any White House phone
5 numbers?

6 A I rely on my Fifth Amendment privilege.

7 Q And could you tell me what the topics of conversations during those phone
8 calls were?

9 A I rely on my Fifth Amendment privilege.

10 [REDACTED] And, again, I'll just say one more time -- and Mr. Mills, if it makes
11 Ms. Gracia more comfortable for you to direct her, I'm fine if you just want to say "Fifth,"
12 instead of "I rely on my Fifth Amendment privilege" and we can move things along a little
13 faster.

14 Mr. Mills. Thank you. We'll just stick with this shorthand that we, you
15 know -- we'll go with it. But thanks for the offer though.

16 [REDACTED] Sure.

17 BY [REDACTED]:

18 Q Then again on November 30th, there's a phone call to Representative
19 Babin's office. Do you recall this phone call?

20 A I rely on my Fifth Amendment privilege.

21 Q Okay. Later in November -- or, sorry -- December 1st, you made a call to
22 Representative Weber's office. Do you recall this phone call?

23 A I rely on my Fifth Amendment privilege.

24 Q Okay. And then we'll move to December 22nd, again a series of phone calls
25 to White House numbers, a landline and a cell phone. Do you recall calling the White

1 House on December 22nd?

2 A I rely on my Fifth Amendment privilege.

3 Q Okay. And then finally, also on that same day, December 22nd, it looks like
4 you called Senator Cruz' office. Do you recall this phone call?

5 A I rely on my Fifth Amendment privilege.

6 Q And do you recall the topics of conversations during that phone call?

7 A I rely on my Fifth Amendment privilege.

8 Q And for all these calls that I've just identified for you, did any of the topics of
9 conversation involve planning for rallies or events in Washington, D.C.?

10 A I rely on my Fifth Amendment privilege.

11 Q And then more specifically, I'll ask, did any of the phone calls involve
12 planning for events on January 5th or 6th?

13 A I rely on my Fifth Amendment privilege.

14 Q Okay. I would have a series of questions about the circumstances
15 surrounding these phone calls. Would it be your intention to invoke the Fifth
16 Amendment with respect to any questions about the phone calls that were just
17 identified?

18 A I rely on my Fifth Amendment privilege.

19 Q Okay. All right. Moving to another event and topic, I want to talk -- move
20 back on January the 5th, 2021. So I'm going to pull up another exhibit. This one's a
21 short video, and we'll watch a few seconds of it.

22 Are you able to see this video?

23 Mr. Mills. Bianca, can you see the video?

24 BY [REDACTED] :

25 Q Can you see the video?

1 A Yeah, yeah. It's small but I can see, yes.

2 Q I'm just going to play a few seconds of it. The audio, you're not going to be
3 able to hear the audio on this. This, if you just saw that -- I'll go back to still with the
4 individuals I'm going to ask you about.

5 In this video, you appear to be in a garage. I'll represent that this video was
6 taken on January 5th. Do you remember a meeting in a garage on January -- on the
7 evening of January 5th?

8 A I rely on my Fifth Amendment privilege.

9 Q Okay. Looking at this video, I'm going to identify some individuals. The
10 first one I'd like to identify and have you confirm is you. On the left side of that screen
11 in a red jacket with a mask below your chin, I believe that's you. Can you confirm that
12 that's you in the video?

13 A I rely on my Fifth Amendment privilege.

14 Q Okay. And the other individuals in this video, I believe immediately to your
15 right are Mr. Enrique Tarrio, and standing in front of him is Mr. Josh Macias. Standing to
16 the right of both of them in the photo is Ms. Kellye SoRelle, and finally behind Ms. Kellye
17 SoRelle is Mr. Stewart Rhodes. Do you know these individuals?

18 A I rely on my Fifth Amendment privilege.

19 Q Okay. I have a series of questions about this meeting and about these
20 individuals and the topics discussed at that meeting. Would it be your intention to
21 invoke the Fifth Amendment with respect to all of those questions?

22 A I rely on my Fifth Amendment privilege.

23 Q Do you know Ms. Amy Harris?

24 A I rely on my Fifth Amendment privilege.

25 Q Okay. Was Ms. Amy Harris also at this meeting?

1 A I rely on my Fifth Amendment privilege.

2 Q Okay. Again, related to some planning for January 5th and 6th, I'd like to
3 ask some other questions. Did you arrange for security to be provided for you or any
4 other attendees of the events on January 5th and 6th?

5 A I rely on my Fifth Amendment privilege.

6 Q Okay. Have you ever arranged for security to be provided at any other
7 rallies in Washington, D.C.? So specifically I'll ask about the rallies on November 14th
8 and December 12th.

9 A I rely on my Fifth Amendment privilege.

10 Q Can you tell me what organizations, if you did have security needs at these
11 sorts of events, you would ask for -- ask to provide that sort of security detail?

12 A I rely on my Fifth Amendment privilege.

13 Q Did you ever ask Mr. Tarrio to help you arrange security for any of these
14 events?

15 A I rely on my Fifth Amendment privilege.

16 Q Did you ever ask any other Proud Boys to provide security for you or any of
17 the organizations you were involved with?

18 A I rely on my Fifth Amendment privilege.

19 Q How about any other militia groups or groups who held themselves out as
20 providing security? Specifically, I'll ask you about the Oath Keepers. Did you ever
21 arrange to have the Oath Keepers provide security for you or anybody else?

22 A I rely on my Fifth Amendment privilege.

23 Q And how about specifically on the 6th, did you communicate with,
24 coordinate with Proud Boys or Oath Keepers in an effort to provide security for anybody
25 on that day?

1 A I rely on my Fifth Amendment privilege.

2 Q Again, I have a series of questions about your planning and coordination
3 with members of the Proud Boys or any other similar groups that were present on
4 January 6th. Would it be your intention to invoke the Fifth Amendment with respect to
5 any questions about their involvement on the event -- or in the events of January 5th and
6 6th?

7 A I rely on my Fifth Amendment privilege.

8 Q Where were you on January 6th?

9 A I rely on my Fifth Amendment privilege.

10 Q Did you attend the rally at the Ellipse on January 6th?

11 A I rely on my Fifth Amendment privilege.

12 Q If you attended the rally, were you admitted into a VIP area or into an early
13 entry area?

14 A I rely on my Fifth Amendment privilege.

15 Q And then I'll ask again, would it be your intention to invoke the Fifth
16 Amendment with respect to any questions about your attendance at the Ellipse rally on
17 January 6th?

18 A I rely on my Fifth Amendment privilege.

19 Q I'd like to ask questions about any other -- or any activities that you engaged
20 in after the Ellipse rally. Where did you go after the Ellipse rally?

21 A I rely on my Fifth Amendment privilege.

22 Q Did you plan to speak on January 6th?

23 A I rely on my Fifth Amendment privilege.

24 Q Would it be your intention to invoke the Fifth Amendment with respect to
25 any other questions about your activities on January 6th?

1 A I rely on my Fifth Amendment privilege.

2 Q I want to ask about your awareness of other individuals planning for events
3 of January 6th. Were you aware that there was going to be a march to the Capitol from
4 the Ellipse rally?

5 A I rely on my Fifth Amendment privilege.

6 Q Were you aware separately that the Proud Boys were planning to march
7 from the Washington Monument area to the Capitol?

8 A I rely on my Fifth Amendment privilege.

9 Q Did you have any communications with Mr. Tarrio about his plans for
10 January 6th?

11 A I rely on my Fifth Amendment privilege.

12 Q Okay. And similarly I have a series of questions about other individuals'
13 plans on January 6th and your awareness of those plans. Would it be your intention to
14 invoke the Fifth Amendment with respect to any questions about any other individuals'
15 plans for January 6th?

16 A I rely on my Fifth Amendment privilege.

17 Q Okay. I'd like to ask some questions about how you communicated with
18 people for planning related to January 5th and 6th. Do you use any encrypted
19 messaging apps?

20 A I rely on my Fifth Amendment privilege.

21 Q Have you ever used Signal?

22 A I rely on my Fifth Amendment privilege.

23 Q Have you ever used Telegram?

24 A I rely on my Fifth Amendment privilege.

25 Q Did you ever communicate with Mr. Tarrio through any encrypted messaging

1 app?

2 A I rely on my Fifth Amendment privilege.

3 Q After -- were you aware of Mr. Tarrio's arrest on January 4th?

4 A I rely on my Fifth Amendment privilege.

5 Q Either after January 4th or after the events of January 6th, did you ever
6 delete any messages with Mr. Tarrio or any other Proud Boys related to the events of
7 those days?

8 A I rely on my Fifth Amendment privilege.

9 [REDACTED] I'm just trying to go back through some of my notes and make sure
10 I've covered most of the topics that we'd like to discuss with you today, but I think we're
11 nearing the end.

12 Let's take just a quick recess. It's 10:38. We'll go into recess until 10:45, and
13 then hopefully when we come back, we can wrap things up.

14 Mr. Mills. Sounds good. Thank you very much.

15 [REDACTED] Thanks. You can go ahead and mute your video or camera if you
16 need to. And I will.

17 [Recess.]

18 [REDACTED] Then we can go back on the record at 10:46, and I think my
19 colleague, [REDACTED], has a few quick questions for you, and then I have a few final
20 close-up questions, and then we should be done.

21 So, [REDACTED], feel free to go ahead.

22 [REDACTED] Thank you, [REDACTED].

23 BY [REDACTED]:

24 Q I just have a few questions a little bit zooming out. First of all, why was it
25 important for you to go to Washington, D.C. on January 6th?

1 A I rely on my Fifth Amendment privilege.

2 Q What were you hoping to accomplish by going to D.C. on January 6th?

3 A I rely on my Fifth Amendment privilege.

4 Q Do you believe that the 2020 election was stolen?

5 A I rely on my Fifth Amendment privilege.

6 Q Was it your belief that President Trump wanted to delay the certification of
7 the election results on January 6th?

8 A I rely on my Fifth Amendment privilege.

9 Q Do you have any reason to believe that President Trump encouraged
10 individuals to try to delay the election results on his behalf?

11 A I rely on my Fifth Amendment privilege.

12 Q Do you believe that Joe Biden is the President of the United States?

13 A I rely on my Fifth Amendment privilege.

14 Q Thank you.

15 [REDACTED] [REDACTED], that's all I have.

16 [REDACTED] Great.

17 BY [REDACTED]:

18 Q Then just a couple more quick questions about Latinos for Trump. Is
19 Latinos for Trump, or was Latinos for Trump an official coalition partner with the Trump
20 campaign?

21 A I rely on my Fifth Amendment privilege.

22 Q And then could you explain to me the sources of funding for Latinos for
23 Trump?

24 A I rely on my Fifth Amendment privilege.

25 Q And then a few more just general questions about anybody you might've

1 spoken to in relation to the events of January 5th or 6th, either just about your
2 attendance or about planning for those events.

3 Did you ever speak to or coordinate with anybody you knew to be employed by
4 the White House with respect to the events of January 5th or 6th?

5 A I rely on my Fifth Amendment privilege.

6 Q Okay. How about anybody employed by the Trump campaign?

7 A I rely on my Fifth Amendment privilege.

8 Q And then how about any other elected officials? We'll start specifically
9 with Members of the House of Representatives. Did you speak with any Members of
10 the House of Representatives with relation to your attendance or planning for the events
11 of January 5th or 6th?

12 A I rely on my Fifth Amendment privilege.

13 Q And how about any Members of the Senate?

14 A I rely on my Fifth Amendment privilege.

15 [REDACTED] Okay. All right. Well, with that, just while we're still on the
16 record, I appreciate you coming and spending some time with us this morning, and I think
17 that's all the questions that we have for you right now.

18 We are -- because you invoked the Fifth with respect to essentially all of my
19 questions, we're going to leave this deposition open and have the option of calling you
20 back at some point, but for today, I believe we're done.

21 Mr. Mills. Thank you very much.

22 The Witness. Thank you.

23 [REDACTED] We can go off the record at 10:49.

24 [Whereupon, at 10:49 a.m., the deposition was recessed, subject to the call of the
25 Chair.]

1 Certificate of Deponent/Interviewee

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4

4 I have read the foregoing ____ pages, which contain the correct transcript of the
5 answers made by me to the questions therein recorded.

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Witness Name

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Date

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