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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: MATTHEW THOMAS WALTER

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15 Wednesday, March 9, 2022

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17 Washington, D.C.

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20 The deposition in the above matter was held via Webex, commencing at 2:00 p.m.
21 Present: Representative Murphy.

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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], INVESTIGATIVE COUNSEL

9 [REDACTED], STAFF ASSOCIATE

10 [REDACTED], PROFESSIONAL STAFF MEMBER

11 [REDACTED], INVESTIGATIVE COUNSEL

12 [REDACTED] CHIEF CLERK

13 [REDACTED] PROFESSIONAL STAFF MEMBER

14 [REDACTED] INVESTIGATIVE COUNSEL

15 [REDACTED] INVESTIGATIVE COUNSEL

16 [REDACTED] INVESTIGATIVE COUNSEL

17 [REDACTED] SENIOR INVESTIGATIVE COUNSEL

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2 Mr. [REDACTED] Then we can go on the record at -- go on the record at 2 p.m.

3 Good afternoon. This is the deposition of Matthew Walter, conducted by the
4 House Select Committee to Investigate the January 6th Attack on the United States
5 Capitol pursuant to House Resolution 503.

6 This is a staff-led deposition, though members may choose to ask questions.

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

9 The Witness. Matthew Thomas Walter, W-a-l-t-e-r.

10 Mr. [REDACTED] Great. My name's [REDACTED] I'm an investigative counsel with
11 the select committee. With me from the select committee staff are [REDACTED] senior
12 investigative counsel; [REDACTED], investigative counsel; and then also [REDACTED],
13 investigative counsel.

14 There are no members present in the room right now, but if anybody else joins,
15 including members, I'll make sure to announce them so that you know they're in the
16 room. Okay?

17 The Witness. Yes, sir.

18 Mr. [REDACTED] Under House deposition rules, neither the committee members nor
19 staff may discuss the substance of the testimony today, unless the committee approves
20 release. And then I'll note that the House rules for this deposition -- or under the House
21 rules for this deposition, you may have an attorney present, but counsel for other
22 individuals or attorneys from government agencies may not be and are, therefore, not
23 present. And then I'll just note for the record that you're not represented by counsel
24 today.

25 I'll also note for the record what has been previously marked as exhibit 1, is the

1 select committee's February 10th, 2022, subpoena for Mr. Matthew Walter, and then the
2 House deposition rules are included in that exhibit.

3 As I mentioned earlier, there's an official reporter transcribing what we're saying
4 for the record, so please wait until I finish my question before you start your answer.
5 It's obviously just hard for the court reporters to transcribe two people at one time, so
6 we'll try to make their lives a little bit easier today. Does that make sense?

7 The Witness. Yes, sir.

8 Mr. [REDACTED] Okay. And then kind of along the same lines, they're only able to
9 transcribe verbal responses, so a yes or a no. So just avoid head shakes. And I might
10 remind you throughout, if I see a head shake, just to use a yes or a no or a verbal
11 response. Do you got that?

12 The Witness. Yes, sir.

13 Mr [REDACTED] Okay. And then today, we just ask that you provide complete
14 answers based on your best recollection. If a question's not clear, feel free to ask me for
15 clarification. And if you just don't know the answer, feel free to say so.

16 You may refuse to answer a question to preserve a privilege recognized by the
17 select committee. Such privileges include the Fifth Amendment privilege against
18 compulsory self-incrimination. If you refuse to answer a question based on a privilege,
19 staff may either proceed with the deposition or seek a ruling from the chairman on the
20 objection. If the chairman overrules an objection, you're required to answer the
21 question. Does that all make sense?

22 The Witness. Yes.

23 Mr [REDACTED] Okay. I also want to remind you that it's unlawful to deliberately
24 provide false information to Congress. This is just a standard warning that we give
25 everybody, but, today, providing false information could result in criminal penalties for

perjury and/or false statements under 18 U.S.C. 1001. And that law just generally makes it illegal to make a false statement to a congressional investigator like myself or the other folks that I introduced earlier.

4 That being said, I want to make it clear that this is a congressional investigation
5 and not a criminal investigation. This proceeding is separate and distinct from any
6 criminal proceeding by the Department of Justice. We are not part of the Department
7 of Justice. We're not a partner in their activities. We're two separate entities. Does
8 that make sense?

9 The Witness. Yes.

10 Mr [REDACTED] And then also, just logically throughout our conversation, if you
11 need any breaks, for water or for the bathroom, just let me know. Always happy to take
12 a break. I'll attempt to remember to take a break about every hour, but just let me
13 know if you need one.

14 And then finally, as I said before, other staffers might jump in to ask some
15 questions, or members, but for the most part, it'll be me asking a question. Other
16 individuals might turn their camera on if they've got a question for you.

17 And then lastly, because this is a deposition, you're under oath today -- or you will
18 be under oath. So could you please raise your right hand to be sworn?

The Reporter19 Do you solemnly swear and affirm under the penalty of perjury that the testimony you are

about to give will be the truth, the whole truth, and nothing but the truth?

21 The Witness. Yes.

22 EXAMINATION

23 BY MR

24 Q Great. So now that we've got kind of those ground rules set, I just want to
25 start with a little bit of information about you. Can you just tell me where you grew up?

1 A Two places, Salem, Ohio, and Sterling Heights, Michigan.

2 Q Okay. And when did you move to Tennessee?

3 A November of 2004.

4 Q So from Ohio and Michigan, can you -- I understand you served some time in
5 the military. Is that right?

6 A That's correct.

7 Q Okay. And then did you go, just explain to me, Ohio, Michigan, to the
8 military? What was your path?

9 A It was Ohio, Michigan, Ft. Benning, Georgia, Fayetteville, North Carolina,
10 back to Ft. Benning, Georgia, intermittently for training and such, then to Tennessee, and
11 you've got Afghanistan and Iraq sprinkled in there as well.

12 Q Okay. We'll get to that in one second. How about your educational
13 background, can you tell me the highest level of education that you've achieved?

14 A I think I'm two credits away from a bachelor's degree in hotel management
15 and hospitality. It may be a couple more than that, but it's -- I'm real close to a
16 bachelor's.

17 Q Okay. Great. Did you enter the military right after high school?

18 A Can you say that again, please? You broke up.

19 Q Did you -- did you join the military right after high school?

20 A Yes.

21 Q Okay. Great. And then when you were in the military, which branch were
22 you in?

23 A United States Army.

24 Q Okay. And then within the Army, what was your job or your MOS?

25 A I was an entry rifle platoon sergeant and a mortar platoon sergeant, so 11

1 series. Primary MOS 11 Charlie, secondary MOS 11 Bravo.

2 Q Okay. And then you mentioned a couple deployments during your time.

3 Actually, first, can you tell me just how many years were you in the military?

4 A I'm going to mess this up, but I think it's 13 years, 8 months. I think.

5 Q Okay. And when did you -- when did you join the military and when did
6 you leave?

7 A I joined the military June 22nd, 2001. I got out of the military March 17th,
8 2014.

9 Q Okay.

10 A And then there's -- I had like 90 days leave, so my actual out date was about
11 90 days after that, but that's the day I signed out.

12 Q Okay. Understood. So you mentioned deployments. Can you just
13 quickly run me through those, the deployments that you had?

14 A I went to Kandahar, Afghanistan, and like that area. Like, we were in the
15 Hindu Kush a lot, and that was in -- I think it was in 2002, but it might've been early 2003.
16 I'm not a hundred -- I've got my ERB I could pull up here.

17 Q That's okay. Just -- just approximate dates is fine.

18 A [Inaudible] you know, I know the dates generally are correct. Then later in
19 2003, we went to Iraq, we went to Fallujah. Then my next deployment was to the
20 Triangle of Death, a little place called Mahmoudiyah, Yusufiyah, Latifiyah, and that was
21 southwest Baghdad. That was in, I think, 2007.

22 Then I went to Afghanistan again -- no, I went to Iraq again. I went to Taji, Iraq,
23 again in 2011-ish, maybe 2009. I don't know. Like, I'm not good with the dates. But
24 then finally I end -- my last deployment was to Kandahar, Afghanistan, again before
25 I -- before I got out.

1 Q For throughout today, if I ask you a question and you're just kind of
2 ballparking a year, that's fine. Just let me know that you're ballparking. And I totally
3 understand that some of these dates are hard to recall on the spot.

4 And then also, sounds like you had a pretty storied career in the military, so
5 thanks very much for your service.

6 A Thank you. Wish I could get back in. Can you get me back in?

7 Q Unfortunately, I can't do that for you.

8 I wanted to ask just about, when you left the service in 2014, can you tell me what
9 your -- I understand when people leave, generally you're assessed for disabilities or you're
10 given a disability status. Do you have any disabilities from your time in the military?

11 A I do, but I don't understand why we need to talk about that. I don't like to
12 talk about it, so -- like, I will if we need to, but --

13 Q No, that's fine. That's fine. Do you -- I'll just ask --

14 A I'm medically retired from the -- oh.

15 I'm actually medically retired from the United States Army.

16 Q Okay. I'll just generally ask if any of your disabilities from your time in the
17 military kind of would affect your ability to testify today, either truthfulness or accuracy
18 of what you're testifying to?

19 A I think the only problem we're going to run into is memory.

20 Q Okay.

21 A I think that's the only problem we may run into.

22 Q Understood.

23 A But I'm competent -- I'm competent and I'm mentally fit to talk to you.

24 Q Understood. Glad to hear that. Just let me know if you need -- you know,
25 if you encounter that difficulty and you need a moment just to think about the answer to

1 a question.

2 And then how about -- so, currently, I take it you reside in Tennessee?

3 A Yes, sir.

4 Q Okay. And where in Tennessee do you live?

5 A Clarksville, Tennessee, as of right now. I'm kind of mobile right now. I
6 just sold my home and I bought an RV, and I just been kind of moving around, traveling a
7 little bit.

8 Q Okay. And how old are you?

9 A 39. No. Yeah, 39. I'll be 40 in September.

10 Q I have a hard time remembering my age at this point as well too.

11 How about, are you -- are you currently employed?

12 A No.

13 Q Okay. What did you do after you got out of the military?

14 A Nothing. I did a little bit of utility construction. I mean, I did field lines,
15 flooders, septic tanks, water, sewer, electric, stuff like that. But then the corona hit, and
16 it was more expensive for me to go to work than it was to work, so I just kind of stopped
17 doing that.

18 Q Okay. Other than that work, have you had any other kind of careers or any
19 job since your time in the military?

20 A When I was in -- when I was in college, I did a little bit of catering, A, for the
21 university and, B, on a side gig, but I wouldn't call it a career. It was just kind of a side
22 hustle.

23 Q How about, what -- can you just describe to me what your -- what your
24 source of income is?

25 A I get paid my retirement and my VA disability and Social Security and

1 combat-related special compensation pay.

2 Q And we'll talk about this, obviously, more today, but do you receive any
3 income or money from your involvement with the Proud Boys?

4 A No.

5 Q Okay. So let's talk about -- a little bit about when you first joined the Proud
6 Boys, what caused you to join. When was it that you joined the Proud Boys?

7 A I want to say March 2017 is the first meeting I went to. I think I'd been
8 talking to a guy for about a month prior to that and, oddly enough, I was just sitting there
9 bored on Facebook one day and this guy said -- like, he had a message, he's, like, anybody
10 in the area want to join the Proud Boys? And I was like what the F is that, that sounds
11 pretty silly.

12 But then I talked to the guy, just to see what it was, and the way it was explained
13 to me, it was what I was looking for. Because after I'd left the military, you know, it'd
14 been about 3 years, and my friends had either died or left. So I was kind of, I don't
15 know, a 32 -- 33-year-old dude that didn't have any friends.

16 So I joined the Proud Boys for the thought that there would be brotherhood and
17 camaraderie, kind of like in an infantry unit. And it was my case that that was true.

18 Q Was -- other than that brotherhood and camaraderie, was there anything
19 else going on at the time that kind of spurred your interest in the Proud Boys, like
20 politically or just in the world?

21 A No. I joined -- I joined before the punch heard round the world. So there
22 wasn't -- there wasn't anything, not that I'm aware of, that they were doing at the time
23 that would've sparked my interest into -- into the group themselves.

24 Q So around March of 2017, when you joined, what were your activities with
25 the Proud Boys like?

1 A We went to this bar one Saturday a month, played beach volleyball, played
2 shuffleboard. And that was -- that was about it for -- my first year, that's about what we
3 did.

4 Q Did -- at that time, did you think that the Proud Boys, the organization and
5 most of the members, had any particular ideology?

6 A At that time, I will tell you 100 percent honestly, that was the best time for
7 the Proud Boys, because there wasn't an ideology. We -- I know guys that are my
8 friends that have Bernie Sanders tattoos. And I'm sure we've already pulled my voting
9 record, so we know what side of the aisle I tend to be on.

10 So it was -- it was just nice. But also, honestly, we didn't talk about politics at our
11 meet-ups. We talked about -- we told shitty dad jokes -- pardon my language -- and,
12 like, bad jokes that just were not funny. And then made fun of each other. Like, that
13 was it.

14 Q You mentioned that some of that changed or the tone of the organization
15 changed after the punch heard round the world. Could you just explain for the record
16 what that event was and how it changed the organization?

17 A It was something up there in the Pacific Northwest, they were just going out
18 in the street and fighting people. And then my friend Ethan fortunately, or
19 unfortunately, hit somebody and knocked them clean out, and that was the punch heard
20 round the world. That was -- that's my description of it anyway.

21 Q And Ethan, is that Ethan Nordean?

22 A That would be.

23 Q Okay. And he goes by Rufio also?

24 A Yeah. That -- I call him Rufio, so, yeah. I think most do. I don't know.

25 Q Do most -- do most Proud Boys have a nickname or an alternative name that

1 they go by?

2 A I would say I don't know most guys' real names. So yes.

3 Q Do you have a nickname that you go by with the Proud Boys?

4 A Well, mine kind of fluctuates. Right now -- right now, I'm Matthew The
5 American Nightmare Walter. Before I was Matthew The People's Chairman Walter.
6 And there was something else in between there that I was. But it always involved my
7 actual name.

8 Q Where did the name Matthew The People's Chairman, where did that come
9 from?

10 A That came -- a long time ago, me and my buddy Hank, Enrique Tarrio for the
11 record, we decided that we'd get in an online internet fight and pretend like we hated
12 each other so the guys wouldn't fight each other, they'd fight for us, kind of deal. And
13 it -- it worked -- it worked all the way up until today. Oh, actually, it worked -- I'm sorry.
14 I'm sorry. I'm lying. It worked all the way up until Hank went to jail. And out of
15 everybody in the organization, it was me that was there with him, and they were like,
16 wait, what? They didn't -- a lot of guys are still mad about that, that me and Hank are
17 friends.

18 Q What is -- can you describe just a little more your relationship with -- we can
19 call him Hank, but Mr. Tarrio? When did you first meet him?

20 A There was -- sometime in, I think, 2018 in Washington, D.C., is when I met
21 him, when the Proud Boys formally said they were going to sue the Southern Poverty Law
22 Center for defamation. I was up there with him. That's when I first met him, and
23 that's where we kind of connected because both of us were sober. And it's real easy for
24 two sober-type guys to gravitate to each other when there's a room full of drunks. You
25 know what I'm saying? And you have, like, coherent conversations and stuff.

1 And then we just kind of -- we ran into each other from time to time. We
2 sporadically talk on the phone. But that's about the extent of it. Like, I wouldn't say
3 we're best friends or anything. We just talk on the phone or, you know, get in the chats
4 and BS or whatever.

5 Q Is -- at that time, was he chairman of the Proud Boys, in 2018?

6 A I believe that answer is yes. I'm pretty sure the answer is yes. You just
7 have to look when Gavin McInnes publicly quit, whenever that day was, was the day that
8 Enrique Tarrio was kind of sworn in. It was that West Fest. It was that September. It
9 would've been that September that he was officially sworn in. So he may not have
10 officially been the chairman at that stage in -- in life, but that's where -- that's where it
11 was going to go.

12 Q And what's Mr. Tarrio's status as leader or not of the Proud Boys now? Is
13 he still the chairman?

14 A The chairman was never the leader. That's what -- that's the one thing
15 that's been gotten so wrong about us, the whole time. The chairman was never, ever
16 the leader. He doesn't even have a vote in anything that involves the club, except if
17 there's a tiebreaker. He's the person that breaks the tie if there's a tie. That's his only
18 vote he ever gets to have.

19 Like, Enrique was just very good -- he's a -- he's got the gift of gab. He
20 understands politics, he understands how to talk to people, whereas a lot of other guys
21 don't. And he also really didn't have anything to lose, so he could be in -- he could be
22 the face of the organization and it wasn't going to hurt him.

23 Q So understanding sort of that distinction between leader and chairman, is he
24 still chairman?

25 A I doubt it. Like, I haven't been at anything recently, but I know he's been

1 removed from everything. I do know that, which that's just -- I think that's just standard
2 rules for everybody. If your buddies get arrested, get them -- you know, get -- get as far
3 away from him as you can.

4 Q When you say "removed from everything," what do you -- what do you
5 mean?

6 A Like, every -- like all the chats, that I'm aware of.

7 Q Okay.

8 A Like, when a guy gets arrested, the standard protocol is bounce him from
9 everything until he gets back out, and then he gets to explain what happened.

10 Q Understood. That's what I was asking. I was clarifying if you meant
11 removed from specific chats.

12 And then I'll also note that [REDACTED] who's also investigative counsel, has
13 joined the Webex meeting.

14 Are you still -- are you still in touch with Mr. Tarrio?

15 A No. He's -- isn't he incarcerated?

16 Q He was recently released, but then also recent, just now, as of yesterday,
17 arrested again.

18 Were you --

19 A That he was indicted, yeah. He was indicted or -- and picked up yesterday.
20 Oddly enough, the night before he got arrested, I -- I called him to talk to him about
21 something that was in his personal life, something that was going on, that I just wanted to
22 discuss with him. And he didn't -- he didn't answer, but I know he was -- they had a little
23 gathering that night down there in Miami. So I think -- I think he was just occupied.

24 Q Okay. And then I'll also note that Mrs. Murphy has also joined the call and
25 is in the Webex.

1 Do you -- do you know, is there -- is there somebody else that is acting as
2 chairman instead of Enrique?

3 A No, there's not. You're going to hear about this person that is the
4 chairman, but the guy doesn't exist. Like, it's a -- it's a fake name. I'm not going to spill
5 the beans on it right now, but it's to throw the media into a frenzy again, that -- like, there
6 really hasn't been a true leader or anything. Like, you guys think we're so much more
7 organized than we actually are. Like, we are not that organized.

8 Q Let's talk about that a little bit actually. I just want to understand the
9 structure of the Proud Boys. Am I right that there are local chapters, and then, is there
10 also a national chapter?

11 A Not -- not that I'm aware of.

12 Q Okay.

13 A It's -- it's -- every chapter is its own entity, and it was always intended to be
14 that way, so that there was -- so nobody could ever say there was a national structure.

15 Q What is the -- what is the elders chapter then, can you describe that?

16 A I can describe that. It used to be -- that used to be the governing body of
17 the club, like, and they were -- what they were really responsible for was chapter creation
18 and that was it. They -- and to plan our yearly gathering of everybody. That was all
19 the elders existed for, was, if you wanted to be a new chapter, they would vote on it.
20 And there were eight of them. That's where Tarrio's one vote, if they ever were split,
21 see what I'm saying, that's where the tiebreaker came.

22 Q Okay. So there were eight elders plus the chairman, and the chairman is
23 the tiebreaking vote. What else --

24 A But the elders -- inside baseball, they don't exist anymore. A lot of them
25 left. There haven't been new elections, so to speak. So the club's just kind of running

1 on cruise control right now, because it's -- everybody's terrified, everybody's a Fed,
2 everybody's telling. So it's just -- it's a strange times.

3 Q Is that sort of breakdown of the elder chapter and the current status of the
4 Proud Boys because of the events of January 6th, or when did that kind of breakdown
5 start to happen?

6 A The club has been fighting itself behind closed doors for 3 or 4 years.
7 There's been a rift on what we would call the rally guys and the party guys -- the guys that
8 want to go out and fight for Western civilization, and then the guys that just want to hang
9 out, drink beers, and "If you need help building a deck, I'll come over" guys, if that makes
10 sense.

11 Q That does make sense.

12 What is -- what is the chapter that you're a member of?

13 A Music City Proud Boys.

14 Q And is that a specific -- cover a specific geographic region or how --

15 A All of -- all of middle Tennessee. So pretty much from Clarksville to about
16 Mount Juliet, all the way down to Alabama.

17 Q And what's your role in that chapter?

18 A You could -- on paper, they call me the president, but we don't really
19 have -- my chapter is designed just like Enrique's chapter, where we don't really have a
20 leadership structure. The guys that have more time to F around on the internet, they
21 tend to -- you know, obviously they take a little more responsibility, but there's not a
22 pecking order. Like, I can't make you do push-ups at one of my meetings. We just
23 hang out.

24 Q How large is your chapter?

25 A Right now, I think we have 25 members, maybe 28. Because I know there's

1 some guys that are in that aren't in the chats. But we used to be about 70 strong before
2 the -- we split.

3 Q Okay. And compared to other chapters, is that big or small?

4 A Well, when we were in that 50 range, I'd say 50, I think, is about normal.

5 Now, there are some smaller chapters, but -- like, typically, in the South, it's hard to get
6 Proud Boys because everybody's a Proud Boy. You know, like -- so it's just -- it's hard to
7 recruit in the South. So I think you see the coastal areas with much larger chapter or
8 presence or membership numbers just because there's fewer -- there's fewer than them
9 than there are of others.

10 Q Okay. Do you cap out at some point, like if you got much more than you
11 said currently 70?

12 A No. I don't -- I don't -- we wouldn't cap out. Like, we just keep getting
13 bigger or keep -- but it's -- I think, for my area, I think it would be very hard to have like a
14 hundred dudes. It just --

15 Q Are there any -- oh, sorry. You were breaking up there a little bit. Can
16 you just repeat that last part that you said?

17 A I just -- I just said that it would be hard for me to get over a hundred just
18 because, like, dudes would just hang out with their friends here. And, you know, it's
19 hard to recruit people when you have, like, strong -- strong ties. Like, the Army base is
20 like right beside me right now. Like, A, we can't even talk to those guys because we'll
21 end their careers, but, B, they get big groups of 25 hanging out, just as easy as we do, just
22 because they have those ties and the camaraderie and stuff.

23 Q Understood. Are there any particular chapters that are prominent chapters
24 or large chapters or well-known chapters?

25 A I think there are many of those.

1 Q Okay.

2 A I think each State, I would venture to say, has like their number one chapter,
3 you know, what I'm saying, like the one that everybody knows or -- or something along
4 those lines.

5 Q Can I -- can I give you a few States and you give me the major chapter?

6 A I probably could.

7 Q Okay. How about Florida?

8 A Right now, Villain City.

9 Q And was that the same for the postelection period 2020 and January 2021?

10 A It would've -- I would've called that Vice City.

11 Q Okay. And why -- why is Vice City, why was it the prominent organization
12 in Florida?

13 A Because the chairman was in it.

14 Q Okay. And then how about -- how about Pennsylvania?

15 A I'd say Philly. I would say Philly. That's the one -- those guys went to my
16 little brother's wedding in Philadelphia, so I have -- I have special ties with those guys.

17 Q And is that the name of the chapter, the Philly chapter?

18 A I think. I don't -- it might be Philadelphia, you know, I don't know. But it's
19 not something weird.

20 Q And let's -- let's talk about the postelection period, so November, December
21 2020 and January 2021. Who was leading the Philly chapter at that time? Or who was
22 the president?

23 A I think -- that's a good question, but I think -- I think for the majority of the
24 period it was Zach.

25 Q And that's Zach Rehl?

1 A Yes, Zach Rehl. But there was another guy slightly before him, but I can't
2 remember his name. And I don't think I ever knew his real name, I just knew his
3 internet handle, and it's -- it's escaping me right now.

4 Q Okay. It's not Aaron, is it?

5 A No.

6 Q Okay.

7 A I know who that is, but it was not him.

8 Q Okay. And why do you know who Aaron is? Do you know his last name,
9 just to make sure we're talking about the same person?

10 A We are talk -- we're talking about the little bald kind that's kind of buff, he's
11 Jewish. That's the guy we're talking about, Aaron. But I don't know his last name.

12 Q Well, is it a hyphenated Wolman -- or Wolkind Whallon?

13 A Yes. Yes.

14 Q Okay. And why do you know Aaron?

15 A Again, Aaron, Zach, and like five other guys came to my little brother's
16 wedding. That's where I met them. My brother was having some booking issues and
17 needed -- needed to fill some seats up so his wedding didn't look empty, so there was
18 about 15 of the Philadelphia guys or the North Jersey guys that came in and kind of saved
19 the day, and paid like 25 bucks a person to get in and have all they could eat and drink.

20 Q Okay. How about North Carolina, is there a particular prominent chapter?

21 A Charlotte. That's what I would say. And --

22 Q And who --

23 A -- it's not -- it's not the guy you think it is. It's -- I know his internet
24 handle -- Bill -- he's the -- he's the man there.

25 Q Bill?

1 A You're thinking of -- yeah. And then there's a [inaudible] chapter. That's
2 the one you want me to say, but that's not the prominent one in North Carolina.

3 Q I lost the connection there a little bit. Which group or which chapter did
4 you say is the other --

5 A Say that again.

6 Q I lost the connection there for a little bit. You skipped. And you said
7 there's another chapter that we might be thinking of.

8 A Yeah. I think -- I think you guys, you want me to say Jeremy Bertino's
9 chapter, but it's not -- that wouldn't -- I wouldn't call that the prominent chapter in
10 North Carolina.

11 Q Okay. Which chapter is Jeremy Bertino's?

12 A I don't even know. It's somewhere on the coast. He's closer to the water,
13 I know that, but I don't know the name of the chapter.

14 Q Okay.

15 A And he's not the president or anything; he's just in it.

16 Q And then I'll ask you about New York also. How about the prominent
17 chapter in New York?

18 A I don't know. I like the guys from upstate New York, but that's just because
19 they're my friends. But I don't know if there -- I don't know if there is a prominent one.
20 It used to be the one Gavin was a part of, but I don't even know if those guys still hang
21 out.

22 Q Is the upstate chapter that you're talking about the Hudson Valley Proud
23 Boys?

24 A No. No. I know -- I know who you're -- I know that chapter, now that
25 you've said it. It's not those guys. They're -- and maybe, like, I'm geographically dumb,

1 but I think the guys I'm talking about are closer to like Watertown, New York, like up in
2 the top.

3 Q Okay. Let's take those two groups then. Maybe could you -- can you tell
4 me who the presidents of those two separate chapters are? Or, actually, sorry, let me
5 change that -- during the time November, December 2020 and January 2021?

6 A But the guy that I know, that I'm talking about, his name is Diogenes of Troy.
7 I don't know what that means, and I don't know his real name.

8 Q Would it be Deon Seeney (ph)? Does that -- or Cheeney (ph), does that ring
9 a bell?

10 A No. That -- that name seems to ring a bell, but that's not -- it's not that guy.
11 That -- that name, I know that name, but I don't know why I know that name. And the
12 other guy, I think, is it that Randy guy? Is he the Hudson guy? I don't -- like the guy
13 that was on Newsmax?

14 Q Randy?

15 A I don't know -- I don't know any -- I don't really know any of the presidents
16 up there. I've chatted with a couple of them, like, on the internet, like -- because
17 they -- one of them, a guy just moved down here from up there, and we helped him move
18 into his house and stuff. So that was the only interaction I ever had with -- with New
19 York really. Because I'm sure you'd know this, but I don't get along with Gavin McInnes,
20 so I -- I stay out of New York.

21 Q Okay. And then how about Utah? I think that's the last State I'm going to
22 ask you about. Do you know any of the Utah Proud Boys?

23 A Do I? I think I do, but I -- I would know them if I saw them, but I don't know
24 their names. Like, I would know them by -- by their face, and I know that a lot of their
25 handles have -- have UT in it, so I'm assuming that's Utah, because it's not University of

1 Tennessee.

2 Q Do you know the name Thad Cisneros?

3 A No. No, I don't know that name.

4 Q And then I'll ask, so for your chapter, are you organized in any way, like, as a
5 legal entity? Is it a nonprofit or anything like that?

6 A No. We're trying to go that way, but we haven't -- we haven't made the
7 step, because we wanted to do the nonprofit so we could preserve our logo, we could
8 preserve -- we could -- being a business, you have a lot more power when somebody
9 slanders you than -- than a normal person.

10 Q And then I'll note for the record, that [REDACTED] investigative
11 counsel with the select committee, has also joined the Webex.

12 Do you know -- do you know how many Proud Boys there are, or is there any way
13 to tell?

14 A There's not. I could -- like, my ballpark, if I tell you, I'm going to say
15 probably 15,000 worldwide. I think if Enrique Tarrio tells you, he's going to WWE you
16 and tell you a hundred thousand. But who really knows, you know, because at the end
17 of the day, it's guys want to -- guys want to fluff their numbers as much as possible.

18 There used to be like a census that was done, but when the -- when the whole
19 everybody's telling and everybody's a cop narrative started to play, the census stopped,
20 because guys were less -- less likely to give information.

21 Q Do you know when -- do you know when the last census was done?

22 A I want to say 2018. Not -- not -- I'm not sure, but I think '18, maybe '19.

23 Q Okay. And what did -- what did the census involve?

24 A They just wanted to know how many members you had, of what degree.
25 Like, every president had to fire in how many firsts, seconds, thirds. And Tennessee

1 doesn't recognize a fourth degree. Well, let me rephrase that. Music City doesn't
2 recognize a fourth degree Proud Boys so guys don't go looking to get them.

3 Q Okay. That's sort of a good transition. Can you describe the four
4 levels -- or three levels of Proud Boys membership?

5 A Yeah. One is -- I guess you could call the first degree is an initiate, like he's
6 brandnew, and all he had to do is say, I'm a Western chauvinist who refuses to apologize
7 for creating the modern world.

8 Second degree is now we decided we want you to be part of the club, so we're
9 asking you to be a member now. So it's just kind of, I guess, like redoing your marriage
10 vows. You're like, hey, you made the cut, dude, like, you passed, you're a standup guy,
11 you've showed you'll come to -- you'll come to things.

12 Then the third degree is, all you got to do is -- I can't -- I got a suit on -- all you got
13 to do is get a tattoo.

14 And then the fourth degree is, what it was involved -- what its origins were, you
15 had to suffer through a hardship with the club or help through a hardship. Like disaster
16 relief, for example, is how Enrique Tarrio got his fourth degree, helping out in that real
17 bad hurricane in Texas.

18 But then guys started giving them for getting in fights and stuff, and in my
19 opinion -- and guys will hate me if they ever hear me say this -- I think that's stupid, going
20 out and getting into fights.

21 Q And what -- what degree are you?

22 A I guess I'm a fourth degree. I've never gotten in a fight, though. I did
23 some disaster relief as well. But we don't -- like I said, in Music City, we don't recognize
24 a fourth degree. So I would tell people that I'm a third-degree Proud Boy.

25 Q Okay. When -- you know, obviously if you do kind of research on the

1 internet about the fourth degree, most people say that it's getting into a fight or engaging
2 in some sort of violent act. Can you just explain how that -- how that came to be or why
3 that's the impression?

4 A Because of our shock jock mouthpiece, Gavin McInnes, went a little rogue
5 and said, fight people, that's why, to be a hundred percent honest. I mean, I don't think
6 he -- I don't think he ever thought -- and sure that this is hypothetical -- I don't think he
7 ever thought it was going to -- like, people were going to do it. Like, I don't think he
8 thought people were going to get Proud Boy -- I think he laughs every time he sees
9 somebody with the word Proud Boys tat. He's like, I made you get Proud Boys tattooed
10 on you. And in his mind, I think he thinks it's probably funny.

11 Q What -- you said you got your fourth degree from doing disaster relief.
12 What was the disaster relief that you did?

13 A Well, I helped out in the floods long ago in Nashville, and anytime -- there's
14 tornadoes here all the time, and we just go help pick up.

15 And then this year, when Waverly flooded, we went and helped -- we went and
16 removed debris. And then I, myself, went to Kentucky also this year when the
17 tornadoes ran through there, because a couple of my friends, their families and stuff,
18 were in a bad way.

19 Q Okay. And then do you -- how about -- we can start with your chapter, but
20 do you know the breakdown of level ones, twos, and threes in your chapter?

21 A Twenty-five second degrees. All -- all of them are second degrees. As of
22 right now, I'm the only third degree, that I'm aware of, that's still with us. Like, before
23 we -- like, before it was about 40 second degrees and 5 third degrees, but they kind of
24 split because they wanted to -- they wanted to fight the world and stuff and I told them
25 that was dumb.

1 Q So do you -- is there any accounting of how many third or fourth or second
2 degrees there are nationally?

3 A I doubt it. I know -- I know the guy that would know that, and I don't think
4 he knows it, because we -- we talk from time -- we have -- the same questions you just
5 asked, like, how many members are there nationwide, I had this with one of the dudes
6 the other day. I was like, well, what do you think it is, man? And he was like, I don't
7 know, dude, nobody knows.

8 Q Do -- sorry. Who was the person that you think would know that answer or
9 keep those statistics?

10 A Harry -- I know his first name's Harry, but I don't know his other name -- his
11 real other name.

12 Q Does he have a handle or a name with the Proud Boys?

13 A I don't know -- I'm trying to think what it is. I don't know, because I just see
14 him -- I just see him as what I have him saved in my phone as. So I don't see his -- I don't
15 see his handle or whatever.

16 Q Okay. We can come back to that. If you remember his name, just let me
17 know.

18 Do you do -- as folks are thinking about joining the Proud Boys, do you do anything
19 to vet members? Are there any specific qualifications?

20 A Yeah, we -- we do -- like, me personally, I do a -- we were doing a
21 TruthFinder background check, because I found it a little more reliable than Intelius.
22 And what I'm looking for there is, did you -- did you beat the shit out of a woman, did
23 you -- did you molest or beat a child, or do you have a -- an apparent drug problem, is
24 what we're really looking for there, anything -- a lot of the other stuff, like, if you have a
25 criminal record or this or that, that's okay, as long as it's removed from your life, like it's

1 not a current thing.

2 And with an organization about -- that's making men better, it's hard to, like, say
3 no, like, hey, you can't -- you can't join because of -- you got a DUI 10 years ago, you
4 know. But anything that involves women, children, or narcotics, we -- we -- I would say
5 most chapters try to stay away from.

6 Q Okay. Understood. And then I also understand that the organization is
7 limited to men, right? Can you explain that?

8 A Yeah. It's just like the Masons, just like the Elks. And every time
9 we -- every time that the Proud Girls or anything tries to start, it just causes problems
10 between us, so we just stopped trying to help them out, like, get it off the ground,
11 because it's making -- when dudes' wives are fighting, that just cause -- that causes for
12 awkward meetings.

13 Q When -- when you're looking at members and sort of vetting them for
14 admission, do you look at whether or not they're associated with any other -- or with any
15 groups that you don't want to be affiliated with or extremist groups?

16 A Yes. I'm trying to think -- because I did leave that out earlier, and I'm glad
17 you -- I'm glad you reminded me about it. There's actually a list of groups that if you are
18 associated with these groups, you are not allowed to be with us. And it's your -- your
19 White supremacist, your extremist, you know. And if you gave me time, I could give you
20 that list, but I'd just have to -- I'd just have to find it. It's on my laptop, but -- and I think
21 it's actually public, because when our bylaws got published on the internet, that list exists
22 of who's not allowed to be with us. And I think as a rule --

23 Q Okay.

24 A And as a rule of thumb, just to elaborate a little more, the motorcycle clubs.
25 We don't like hanging out with the motorcycle clubs because it then -- if this guy doesn't

1 like this guy in different States, then that causes problems too.

2 Q You -- you mentioned the bylaws. Is it -- were the ones that you're talking
3 about that were released 2018 bylaws?

4 A I think so. And there might be a 2019 update to that. So if that list isn't in
5 the 2018, it would be in the 2019. And I thought those were on -- on the internet as
6 well.

7 Q Okay. I know we have and I can pull it up if we want to, but I don't see any
8 need to right now. We have the 2018 bylaws that are available. Would you be willing
9 to produce to us updated bylaws?

10 A Yeah. Whatever the -- the most updated ones I have, because they don't
11 change very often. It's either -- if it's not that 2018 version you have, I'll provide it.

12 Q Okay. Great. I'll remember to -- I'll follow up with you then about that.

13 Okay. So I know you said that you're not organized as a nonprofit right now.
14 How do you -- how do you handle finances for the group? Do you have like a bank out
15 for the chapter?

16 A We do a lot of ours in -- in cash -- or like a, you know, those little bank bags,
17 those -- with the zipper that have -- you know what I'm talking about?

18 Q Yeah.

19 A It stays in there. And most of the time the only money we get is -- like, we
20 were charging dues, and this year, we decided not to do dues, A, because we were going
21 to run into an IRS issue if we made too much money, and, B, well, why not just if we need
22 money, we'll just do a fundraiser right quick and get the money for what we need and be
23 good to go. Because all we were using the dues for was, you showed up to the meet,
24 and everybody's first round or two was on the house, or like we'd buy like two large
25 pizzas and four buckets of beer or whatever and -- so all the dues were going away right

1 away anyway. So it didn't make sense to be exchanging money.

2 Q Were there different levels of dues associated with your level of
3 membership or was it the same dues for everybody?

4 A No. Everybody paid the same, except for the -- the first degrees didn't pay
5 while they were waiting for membership. So for 3 months, they never -- they didn't pay,
6 because it wouldn't be right if, you know, they didn't make it and they were paying
7 money in every month.

8 Q I know that there's a lot of kind of merch associated with the Proud Boys,
9 T-shirts and hats and things. Do -- does your chapter sell any of that to raise funds for
10 the chapter?

11 A We did at one point. We did a huge T-shirt run. I did a T-shirt, just
12 because this is on the internet, so I'm sure -- there's no reason to lie about it. I did a
13 T-shirt for Zach Rehl, to raise funds for him. And we had Music City Proud Boys shirts,
14 and on the back it said, Drinking Club With a Patriot Problem, is what our shirts say, and
15 Save a Horse, Ride a Proud Boy, is our other shirt. And we have a Jam City Proud Boys
16 shirt, which is to -- which is to tease our antifa counterparts in Nashville.

17 But we haven't -- we haven't done a run -- we were doing hats too for a little
18 while. But now that the guys know where the T-shirt shop is, it's just easier for them to
19 go get a shirt they want made. Like, they've got all our designs and stuff, and the
20 guy -- the guy knows who he's allowed to print them for and who he's not.

21 Q Can you -- can you describe that T-shirt shop, what is that?

22 A What?

23 Q Just it's one centralized T-shirt organization for the Proud Boys?

24 A No, no, no, no, no, no. This one's in -- most guys go to their own place or,
25 like, the merch --

1 Q Oh, you mean for your chapter?

2 A Yeah, like, the merch peddlers, they'll buy the equipment and shit
3 and -- sorry for cussing -- they'll buy the equipment and make their own stuff. And we
4 call them grifters because that's all they're doing is grafting off people.

5 Q Are there -- I know you said that there isn't a national chapter, but are there
6 national leaders or nationally prominent members who are also selling merch frequently?

7 A Well, I know Tarrio sells merch. I don't know if he does -- he hasn't sold it
8 in abundance in a -- in a while, but I know he -- he sells. I don't know of any other -- and
9 to your first point, no, there is no such thing as national leadership, and, B, I don't keep
10 good track of the guys that sell merch. Because I think, you charge me \$60 for a hooded
11 sweatshirt is bull crap, when I can go -- when I can go down the road to my place and get
12 it for 25, same thing. So I just -- I don't understand it, and I don't really know any of the
13 merch -- any of the big merch people. I had one guy making us a coin, but that fell
14 through.

15 Q So I know you had previously mentioned that there's not a national chapter
16 or national leadership, but am I right that at some point Enrique Tarrio had -- had
17 incorporated or created a legal entity for the Proud Boys? Is that right?

18 A That's -- that's incorrect. You're -- you're correct about the legal entity, but
19 it was not Enrique Tarrio that created it. It was Gavin's lawyer, J.L. Van Dyke, that
20 created it. And I -- I hear this dude in Tennessee owns it now. I don't know how true
21 that is, but I hear a guy in Tennessee owns it. And nobody -- because we let it go. We
22 said, owning that's too dangerous. Like, Enrique had the opportunity to buy the LLC, but
23 I don't believe he did.

1

2 [2:59 p.m.]

3 BY MR. ██████████

4 Q Okay. I'll also note, I don't know if I have yet, that ██████████, also
5 investigative counsel for the select committee, has joined the Webex.

6 When you collected dues, did you say that was all in cash?

7 A Cash or sometimes guys would send a Cash App.

8 Q Okay. Other than Cash App, did you use among the Proud Boys any other
9 kind of applications like that?

10 A I'm sure guys used Venmo. I'm sure some guys used PayPal. Oh, most of
11 us aren't allowed to use Venmo or PayPal anymore. But, yeah, I don't know. I know I
12 didn't. I used Cash App.

13 Q Okay. You mentioned that sometimes you'd do fundraisers for specific
14 activities. Did you do any fundraisers around the 2020 election or January 6th?

15 A I don't think I did any fundraisers around either. I think -- other than what I
16 previously said about making Zach Rehl a T-shirt after he was arrested, I do not believe so,
17 because that's not my thing. I'm not -- I wouldn't raise money for that. I'd rather raise
18 money to have a really cool party.

19 Q So for travel to Washington, D.C., for the 6th or anything associated with the
20 6th, you didn't use Proud Boys money, you used personal money?

21 A Yeah. There's no -- like, yeah. Now, I do think -- I'm trying to think.
22 Okay. In between there, just for clarity and honesty, in between December and January
23 6th, there was that one where everybody got stabbed, there was a stab fest that went
24 down.

25 Q December 12th?

1 A We raised money for that. And one of my guys got stabbed. So we did
2 use club -- we used our money to drive to get him to bring him back home to Nashville,
3 because we had to rent an RV and stuff like that so he could lay down on the way back.

4 Q And that was the December 12th event in D.C.?

5 A Yeah. I wanted to say the 14th, but if you're saying the 12th, I believe it.

6 Q There was -- we'll talk about this in a minute. But there was also a
7 November 14th rally.

8 A Yeah. I was unable to go to that one, but I'm aware of that one.

9 Q When you raised money in December -- well, actually, first I should ask who
10 was it that was one of your guys that got stabbed?

11 A Todd Gregory.

12 Q And when you raised money for -- to go get him from D.C., how did you raise
13 the money?

14 A We just asked guys inside the chapter, "Hey, has anybody got a couple extra
15 bucks to help us go get Todd?"

16 Q Okay.

17 A And for Todd we did a GiveSendGo that got like \$107,000. But the club
18 never got any of that money. He got all that money.

19 Q Okay. So you raised -- was it cash that you raised for members to go get
20 him?

21 A Yeah. We just said, "Hey, anybody that can throw some extra coin to go
22 help get Todd, it'd be cool. But we understand it's right around Christmastime, so --"

23 Q Okay. Do you. Other than raising money, do you receive funds from any
24 person or group to help you finance things?

25 A No.

1 Q Okay. Do you know if that's true for other chapters? Have you ever
2 heard of individuals or entities that give money to Proud Boys chapters?

3 A Not that I'm aware of, because anybody that had money to give away would
4 understand that the Proud Boys are Kryptonite and they better stay as far away from
5 them as possible. So that was not be a publicly known thing. Like, there's very few
6 people in the world that would be stupid enough to do that.

7 Q How about before -- and I'm basing this on the assumption that you mean
8 Kryptonite after January 6th -- how about before January 6th or the election, was there
9 anybody that you know of that was donating money to the Proud Boys?

10 A Not that I know of. And I don't think it was true. We've been Kryptonite
11 since way before January 6th. It was actually December -- like, November 14th we
12 became America's heroes. And then that got messed up, I think you said the date was
13 December the 12th.

14 And that's why we didn't want to go to January 6th. It was actually put out and
15 we were told, it was agreed upon that if you went on January 6th you were not a Proud
16 Boy when you got there. You were [inaudible]. Don't wear any stuff, don't wear
17 nuthin'. Don't even be [inaudible]. If you're a Proud Boy, you're not to go to January
18 6th. Like, you're not -- like, they said very specifically, and all the presidents agreed,
19 don't wear any Proud Boys gear. If you go you're going there as your own person, not as
20 a member of the club.

21 Q You mentioned something about on -- and maybe I misheard you -- but you
22 mentioned something about on November 14th becoming America's heroes. What was
23 that? Can you explain that?

24 A Yeah. Like, I wasn't at that rally, but we saw the press from it. And
25 everybody -- like, the news we were getting or the headlines were the Proud Boys go to

1 save the -- save the day. They're helping out old women and children get through these
2 crowds. This, that, the other thing. And it was probably the best optics we'd ever
3 gotten in our -- in the history of the organization was that day. And all it took was one
4 month later and dudes fightin' normies to change that.

5 Q We'll come back and kind of talk about the November and December rallies
6 in a second. But just kind of last thing on the finances issue, do you use cryptocurrency
7 at all?

8 A I do. And I wish I didn't.

9 Q Why do you say that?

10 A Because Dogecoin, I need Elon Musk to manipulate the market again.
11 Okay? And I know he's wary about that. That's why. Like, I invested in some of that
12 stuff. But I don't -- like, I'm such a boomer, I don't know how to use it. Like, I don't
13 how to buy things with bitcoin. Like, I know on my individual Cash App, when bitcoin
14 dips, I'll put, like, \$100 in. I think I own like 0.13 of a bitcoin.

15 Q So other than personally, do you know if the Proud Boys as an organization
16 or chapters use cryptocurrency?

17 A No. I don't believe so. I know there are guys that are heavily into it
18 personally, and they try to, like, teach other guys how to make money off it. But clubs
19 and chapters I don't believe are using it as currency.

20 And can I use the restroom real quick?

21 Q Sure. Why don't we take a 5-minute break. So it's 3:08, we'll come
22 back -- let's just come back at 3:15.

23 A Okay. Gotcha.

24 Q And you can go ahead and mute your mike and turn off your camera. And
25 we'll go will into recess now.

1 [Recess.]

2 BY MR. ██████████

3 Q I want to talk a little bit about -- you've kind of described a little bit of a
4 divide into -- and tell me if I'm mischaracterizing this -- but kind of two groups in the
5 Proud Boys. You've described one group as the people that want to fight the world, or I
6 think you said maybe defend Western chauvinism, and then another group that is more
7 interested in drinking and partying and hanging out. Is that accurate?

8 A Yes. Yes, that's accurate.

9 Q And do you see that divide in your own chapter?

10 A Not -- we had already split, so we don't see it anymore.

11 Q Okay. Right. Yeah, you mentioned that split. Can you describe that for
12 me and when did that happen?

13 A March after January 6th, whatever year that was, 2021.

14 Q Right. Okay. And so I take it that some of the folks, maybe like Todd, who
15 was in December 12th, is he in the group that's interested in fighting the world?

16 A I don't think those guys still even exist anymore after they split. Like, we
17 were the glue holding them together. But when you get -- and I've talked to some of
18 them recently. And they were like, "Man, I just miss the friendship, I miss this." And I
19 go, "It's what it was always about, dude. That's what it was always about."

20 And I don't think they hang, I don't think they get together too often anymore, just
21 from the rumor mills and, you know, what I hear on the internet. Like, they think the
22 Federal Government's sitting outside their houses and shit. They watch too many
23 movies. They don't understand, like, they don't sit outside your house, they just go in.
24 Like, they come get you when they want to have you.

25 Q Can you then kind of just describe for me around the election, 2020, what

1 was your chapter's involvement in the election or politics around that time?

2 A Funny. Funny. Well, my involvement is always high, because I'm a
3 shadow man inside a lot of these campaigns. Like I said, I don't need pay. I'll just
4 volunteer. I'll help out. I'll put signs in. Just don't ever take a picture of me, because
5 I will ruin your political career.

6 So I'm real into it, but mainly because I've got two or three friends that ran for
7 local offices or that were heavily into campaigns. And I was, like, I'd like to learn how do
8 that stuff. Like that seems like I'd be interested in it.

9 So to answer the next part of your question, we had a big gathering the night the
10 debates were in Nashville. We were hanging out at the one of the rooftop bars
11 watching the debate. Excuse me. And Trump was supposed to come to where we
12 were.

13 He pulled the plug on that, and I think Kimberly Guilfoyle might have showed up,
14 but we weren't very interested in hanging out with her. So we just went down the road.

15 But as a club, and I may be a traditionalist, we're not supposed to be a political
16 organization. So we try to stay -- like, when I do my stuff with the Republican Party in
17 town, I don't go as a Proud Boy, I go as Matthew Walter. I don't wear any of my stuff.
18 Like, they don't know -- I try not let people know who I am because I am one Google
19 search away from you knowing who I am.

20 So I don't know if that answers your question.

21 Q Yeah, it does, or it starts to.

22 I want to ask a little bit about the event that you said that President Trump was
23 supposed to be at. That was associated with a debate? Is that what you said?

24 A Yes, sir. There was -- when they had the debate in Nashville, I think it was
25 at Belmont University, rumor had it Donald J. Trump was supposed to roll into Kid Rock's

1 Honky Tonk and kind of do some handshaking and hugging and high fivin'.

2 And then Kid Rock ended up coming and doing, like, two sets -- like, two songs, I'm
3 sorry -- and he left. And during that time, the bar had to close like 10 because of COVID.
4 So it was an early evening. And that was my recollection of that.

5 I think that same day there were guys pretending to be us downtown.

6 I actually got a phone call from I think Metro Nashville called me and said, "Hey,
7 are you guys -- your guys are still at where you said you were going to be, right."

8 And I go, "Yeah, we are - nobody knows we're here. So we're not causing any
9 problems."

10 And he said, "Okay. Well, there's rumors you guys are downtown, right outside
11 of Belmont."

12 And I go, "That ain't us. I don't know who it is, but it is not us." So --

13 Q How did you learn that President Trump was going to be at, you said, Kid
14 Rock's Honky Tonk?

15 A I forget how I found it out. It was through the grapevine. We were
16 downtown maybe a week or two before and had heard the Secret Service had went into
17 Kid Rock's place. So that was -- that's what we -- we were assuming that it was for
18 Trump, because the Secret Service went there.

19 Q Okay. Have you during the course of the 2020 election or during the
20 Nashville debates, did you ever have any contact with any members of the Trump
21 campaign or anybody from --

22 A No.

23 Q -- the White House?

24 A I'm sorry for interrupting. No. I didn't have any contact with anybody in
25 any campaign at that time, to be completely honest.

1 Q Okay. And "any campaign", you mean any Presidential campaign?

2 A Presidential, senatorial, you know, just any of the local stuff too. We didn't
3 really participate too heavily that one, because I just was busy in my personal life at the
4 time.

5 Q Okay. Let's, since we're on the topic of Trump, can I ask you what -- would
6 you say that most Proud Boys are -- and let's focus on the timeframe late 2020, early
7 2021 -- would you say that most Proud Boys are supporters of President Trump?

8 A I would say no. I would answer that question no.

9 Q Okay. Let's talk about then the event at the debate where President Trump
10 mentions Proud Boys. I'm sure you're aware of what I'm talking about, the "stand back
11 and stand by."

12 A "Stand back and" -- yes. Yeah. I'm aware of that comment.

13 Q Okay. Can you just tell me, take me through your experience of hearing
14 that, and then what that meant for the Proud Boys?

15 A Well, I personally said -- let me try and think. When I saw it, because I think
16 I was -- I think I was actually watching that, and I went, "What's he doing? That's
17 suicide. He just killed himself on stage."

18 And I don't think he meant to say that. Like, I think he meant to say some other
19 things and that just kind of came -- kind of like Trump does, he had a Trumpism. It just
20 shot out right quick, like, "Stand back, stand by."

21 And I do know the internet exploded. And I think personally that was the worst
22 thing that ever happened to the Proud Boys, was that moment, because then a lot of
23 fringe guys started coming out of the woodwork. They wanted to do joining the Proud
24 Boys now too, because they wanted to use our voice that we had to spew their shit.

25 Q Other than fringe folks coming in, was there anything that your chapter did

1 as a reaction to that "stand back or stand by"? Did you get more involved with the
2 Trump campaign or anything like that?

3 A No. We didn't.

4 I don't know what's going on with the connection here. Is my connection good?

5 Q Yep, I can hear you. Can you hear me?

6 A I can hear you, but sometimes you're -- I got like a spinning circle. But I can
7 hear everything you're saying.

8 Q Okay. I was just asking if you became more involved with the Trump
9 election or candidacy after "stand back" -- after the "stand back and stand by" moment?

10 A No. I didn't, my chapter didn't. We actually at that time in our lives, we
11 had already started kind of going, I guess for lack of better terms, underground. We
12 were being -- we weren't going out with the shirts on as much or with a bunch of gear.

13 We understood it was not a good idea -- it's not a good idea to hang out in east
14 Nashville with only 15 dudes where everybody hates you.

15 So we were kind of, even before that, we were already kind of underground.
16 Like, we were having our meets at people's houses or we were going to places we knew
17 were absolutely friendly to us, that liked us, that we wouldn't have any problems.

18 Because at that time, the country was so toxically divided already that how I
19 perceived it was anything we do is going to get blown up to level 10. Like, if we got in a
20 bar fight, it would be the worst thing in the history of the world.

21 Q You mentioned that a lot of fringe people started to join or started to
22 become interested in the Proud Boys after that "stand back and stand by" moment.
23 How did your chapter deal with that?

24 A We -- after "stand back and stand by" we stopped reading the emails for
25 almost -- was that -- that was said in 2020. Am I correct?

1 Q September of 20 -- September of 2020. Yep.

2 A Okay. Yeah. After "stand back, stand by" I don't think I read email for
3 almost eight months. We just stayed how we were. But then we started reading the
4 emails that we were getting and they were, like, "I want to save America. We can't
5 stand for this shit. We can't stand for this." A lot of what I would call cringe language
6 was in these -- and I was just like, "Eh, I don't think we want that guy."

7 And we just waited. And then at that eight-month mark, I think I sent maybe 50
8 emails out to guys that I thought were decent. And at that point, I want to say the 6th
9 had already -- like, now people are terrified to join us because they know it will ruin their
10 lives again, because the doxxing phase is back.

11 We went through that in about 2018 and then it ended. And in 2019, that was
12 all -- that stopped happening, like, people stopped losing their jobs and stuff, because it
13 was just not effective anymore.

14 Well, then January 6th happened and we gave them the ammunition to label us as
15 violent extremists and get people fired from their jobs again.

16 Q Do you know if other chapters kind of reacted in the same way or do you
17 think other chapters let a lot of these fringe people in?

18 A Well, as previously mentioned, we have the divide. Those chapters -- I
19 won't say most, I'd say approximately 50 percent of the chapters closed the doors.

20 Like, we shut the website down. We shut everything down after -- like, leading
21 up to January 6th there was nothing that we had public, like for recruiting, so to speak.

22 But there were some guys that were still actively recruiting in their local areas, you
23 know, and those are the same guys that are wearing, like, body armor to county
24 commission meetings and stuff like that.

25 Q So I know that Enrique Tarrio has claimed that the membership doubled

1 after "stand back, stand by." Do you think that's an exaggeration?

2 A I would say absolutely it is. And kind of like we said when we were off the
3 record when this started, like, every -- like, a lot of these public figures inside the club
4 have an online persona or a character that they play, when that's actually not -- that's not
5 them. That's not who they really are or what they really believe. But because the
6 media has made me the boogeyman, I have to go the boogeyman in public. Or I can
7 exaggerate things. Like, lying to the media is not a crime.

8 Q So then, just focusing on that comment by Enrique Tarrio about doubling
9 membership, to me that reflects him being satisfied with the membership doubling or
10 being okay with the fact that "stand back stand by" brought in new types of folks to the
11 Proud Boys.

12 Is that true? And how do you feel about that if that's what happened?

13 A I don't think that's true. I think that was Enrique playing a joke that he
14 thought was funny, that may have as of yesterday bit him in the butt. Because some of
15 the things that he said -- and I don't know what they are, but I just know how he talks on
16 the internet -- can be seen to make him appear as if he's an extremist.

17 But if you actually meet the guy, the real guy, Enrique Tarrio, he's the farthest
18 thing from extremist. The guy doesn't drink. Like, he doesn't drink, he doesn't do
19 drugs. He's always levelheaded. He's always in control. I don't know why he doesn't
20 drink, he's never told me, but I know he doesn't.

21 Q You know, you've kind of -- I think you've said Enrique maybe isn't extreme
22 or isn't what the media makes him out to be, partially because he doesn't drink and
23 because he's not involved with drugs.

24 Do you think in the Proud Boys folks that do drink or do drugs more often are
25 more of the extreme members?

1 A No, I don't think that to be. I mean, it's a men's drinking club. I don't
2 think that that means because they drink or potentially do drugs that that gives them a
3 higher chance of being a wackadoo, because, I mean, you joined a men's drinking club.

4 So obviously there's going to be people who drink alcohol -- unfortunately, like
5 me, some of them to excess -- and have a good time. But I don't think that necessarily
6 makes them like an extremist.

7 Q Okay. All right. I want to focus a little bit more kind of on the November,
8 December, January timeframe and some more specifics about your club.

9 So the first thing I want to ask is, how do you normally communicate with other
10 Proud Boys? What are the main either apps or messaging systems you use?

11 A I know I use Telegram. We used to use -- now, to give you a full picture of
12 the timeframe that we're asking about, it used to be Facebook. And then like the third
13 wave of the purge happened and none of us are on there anymore. There's like -- I'd say
14 there's probably 100 Proud Boys left on Facebook.

15 I got banned from Facebook and Instagram for posting photos of my daughter and
16 food. That's all I ever talked about on there.

17 But back to your question, so then, like, we've tried every -- WhatsApp, MeWe,
18 Telegram. Like, if there's a social media platform that's not Facebook or Instagram,
19 we've tried it. I'm surprised we didn't try to go back to Myspace, to be honest with you.

20 Q Okay. So you said you mostly personally used Telegram. Did you all use
21 Signal?

22 A I didn't use Signal to talk to PBs. I have a couple retired Army buddies that
23 that's all they talk with, is Signal. And I guess that's a Special Forces thing. I don't
24 know. That's what they said. "This is how we talked when we were overseas, so this is
25 how we talk now." So I talk to them on that. And I probably have talked to a Proud

1 Boy or two on Signal, but I didn't use it exclusively, if that makes sense.

2 Q Yeah. That does.

3 How about -- so I know you said everybody was kind of kicked off Facebook. Did
4 you use Parler as a substitute for Facebook?

5 A Yeah. But then Parler got deleted forever. So every now and again I get
6 on there and shoot a parlay or whatever it's call. But, eh, ever since I've been banned
7 from the internet I really don't use the social media apps anymore.

8 Q During the November, December, and January timeframe were you or Proud
9 Boys active or Parler?

10 A I'm sure that -- I'm sure that's yes. Actually, I know I am, because
11 I'm -- something the news, the national news put on there was my -- all my -- now, it
12 might have been tweets. I can't remember. It was either Twitter or Parler that I was
13 saying that the people's chairman is in the People's House. And they believed -- I did
14 some photoshopping and they believed I was all the people inside the Capitol at one
15 point.

16 Q Okay. Did you follow Tarrio on Parler?

17 A Probably.

18 Q Okay. How about Reddit, do you use Reddit much with Proud Boys?

19 A No. I'm on Reddit. Some crazy lady from Nashville has a thread about
20 me, but I don't use -- I don't really use that platform. I don't understand how to use it,
21 so I don't use it.

22 Q Okay. And then let's talk -- so in the November and December and January
23 timeframe was it common for Proud Boys to provide security at political rallies, so like the
24 November 14th rally, the December 12th rally? Were you involved in that at all?

25 A I wasn't involved in that. I don't know who was involved in that. But I

1 think some guys like to be bodyguards without a license and, you know, not knowing
2 what they're really doing. So I would say, yes, that probably is true, but I wasn't
3 involved in any of that.

4 Q Okay. Do you know anybody in particular that you had conversations with
5 or talked to about providing security at any of the rallies?

6 A In that November to January timeframe?

7 Q Yeah.

8 A Not that I can think of.

9 Now, to clarify that, though, I probably talked to people that were -- that
10 did -- that wanted to do that stuff, but they didn't -- they never would talk to me about
11 that, because they knew that wasn't my gimmick, that wasn't how I rolled, that I'd call
12 them names and bully them if they asked me to be a part of it.

13 Q Did you ever talk to Tarrio about providing security for people at rallies?

14 A No.

15 Q Okay. Other than providing security, how about just showing up or being a
16 presence at rallies for some particular purpose, do you -- did you engage in that?

17 A I went to a couple of the Stop the Steals in Nashville just because they were
18 big parties. They weren't really -- I wouldn't call them political rallies. It was a bunch
19 of likeminded people that just got together and listened to some internet celebrities talk
20 about like saving America. So I did go to some of those.

21 Let's see, I went -- I was supposed to go to the November rally, but something
22 came up with my kids, so I did not go to that one. I went to the 12th rally, and I went to
23 J6. So I attended -- those are the things I attended.

24 Q Okay. And when you attended those, so I know you weren't providing
25 security. Were you there to oppose any particular groups like BLM or antifa?

1 A I was there for the after-party.

2 Q Okay. Do you remember ever talking to other Proud Boys about antifa or
3 BLM presence at those rallies?

4 A I'm sure I did talk to them about their presence, because a lot of guys
5 respected my prior service, military and stuff like that.

6 And they'd ask questions about, like, "Oh, well, where are they at, what are they
7 doing?"

8 I go, "Who cares. Let's just leave them. If they stay over there and we stay
9 over here, there can't ever be a problem."

10 So I think I answered your question.

11 Q Yeah, you did.

12 So you mentioned that some guys knew not to talk to you about providing security
13 or doing that type of work at rallies. Can you just expand on that a little bit for me?
14 What was their impression of how you would react?

15 A They know I wouldn't like it, that I would say, "You are gay. Like, this is
16 dumb. Why are you doing that? Why are you risking everything when you have
17 nothing?"

18 Like, that's my stance on the rallying and fighting. Like, the rallying, cool. Be
19 patriotic, express your First Amendment. Going to intentionally get in fights, that's
20 dumb. That's a crime. You know, that's -- so they knew that that's how I believed.
21 And I'd always tell them, "I've got 49 months in combat and I'm almost 40 years old. I'm
22 not gettin' in a fistfight."

23 Q Did that -- I know we talked about the divide in your personal chapter, but
24 did that ever cause any problems with other chapter presidents or more nationally
25 prominent people, that your distaste for doing that kind of thing at rallies?

1 A I think at first it did. Like, and I'm talking about in 2018 and '19, people
2 were rubbed wrong about it. Then by the time these events came up, they just knew
3 that was -- they weren't going to change it. That's how I was. And, well, let's just be
4 friends. Like, I don't agree with you, you don't agree with me, that doesn't mean we
5 can't drink a couple Miller Lites and eat a couple hamburgers together.

6 Q Did that argument or that difference of opinion come up with Tarrio?

7 A I don't think him and I ever talked about it, because we both knew that we
8 were on polar sides of the fence and that we liked each other. So we just didn't engage
9 in that kind of conversation.

10 Q Okay. But you would put Tarrio kind of in the group of people who were
11 interested in defending Western chauvinism, fighting the world, and performing these
12 security and kind of combative roles at the rallies?

13 A I think in 2018 I would have put him there. Tarrio began to shift to more
14 like the brotherhood above everything else later. Like even before January 6th, he was,
15 like, "Eh, I don't know if we should be doing this. Like, this seems like it's gonna to blow
16 up."

17 So he was kind of shifting, he started to shift his thought process, because I think
18 he understood that guys were getting in trouble. And he hates that when guys get in
19 trouble. Like, he -- I want to say he's remorseful, I don't want to put words in his mouth,
20 that he's sorry his friends are in jail right now. And he's trying to --

21 Q Well --

22 A Before he got picked up the other day he was trying to do everything he
23 could to help them, like get money for their legal teams and stuff like that.

24 Q What caused the shift or when was the shift that you're talking about for
25 Tarrio?

1 A It's been a slow process since I want to say 2019. But, again, a lot of people
2 that just see him on the internet, they don't -- they're going to say that I'm incorrect.
3 But when you have private conversations or you see him in places where he doesn't have
4 to be in character, he was talking about change and about how we can shift the
5 organization back to what it used to be, kind of, or what it was designed to be. Let me
6 say it that way, not what it used to be, what it was designed to be.

7 Q Okay. Let's talk a little bit about the -- so you said you did attend the -- was
8 it the November rally?

9 A Not November. I attended December.

10 Q Okay. December. When did you head up for the December rally?

11 A I think we got there Friday night. I want to say we left Friday morning. Or
12 maybe -- or it could have been the same thing but Thursday. I'm not super sure. But it
13 was the day -- it was the day prior to the rally is when we got there. The night prior, I'm
14 sorry.

15 Q Okay. And did you go up with a group from your chapter?

16 A Yes.

17 Q And how big was the group from your chapter?

18 A Five or six. It was five or six guys. We rolled up in an RV.

19 Q At that point the split hadn't happened, I guess, right? So you still had
20 some of the guys in your group that were more interested in fighting at the rallies?

21 A Yes, sir.

22 Q Okay. And do you know, did you have any conversations with them, were
23 they planning on providing security or doing any of that sort of work at the December
24 rally?

25 A Not that I'm aware of.

1 Q Okay.

2 A I don't believe we ever talked about anything like that. And I just told
3 them, "Hey, stick with me. This is a big event. It's going to be really cool. But we've
4 got to remember keep your eye on the prize. Remember, everything we do here is
5 going to be heavily scrutinized."

6 Q Do you think some of them wouldn't have told you if they were involved in
7 some of the group discussion about fighting at the rallies or about opposing antifa?

8 A They probably would not have told me.

9 Q Okay. And then I know the member of your chapter, Todd, ended up being
10 one of the guys that was stabbed at the event. Do you think he was involved in those
11 discussions? Or how did that happen?

12 A Wrong place, wrong time. Because to explain what happened that night is
13 the police had kind of barricaded us in the block where Harry's -- the Harrington, the
14 hotel and the hamburger joint. We couldn't move.

15 So it was starting to turn into the -- like, guys were going up to their rooms,
16 getting cases. It was turning into a block party is what was happening. And that kid,
17 the stabber, they saw him, and some girl went after him. And then he
18 started performing the work.

19 I would say that's not the first time that young man held a knife or attacked
20 somebody with it, because he seemed to be pretty fairly proficient with that. And he
21 got Todd under his body armor.

22 So it was just wrong place, wrong time. Because Todd and I think Bert, Jeremy
23 Bertino, went to defend that girl and they didn't know that that dude had a knife.

24 Q And so you said Todd was wearing body armor. Were you wearing body
25 armor at that event?

1 A No. I refuse to wear -- I'm the guy wearing the orange shirt in all the
2 pictures. I did not have the body armor on.

3 Q Okay. And why did you choose not to wear body armor?

4 A I wore body armor for 14 years. I don't need to wear it. I said that if they
5 get me today and I didn't get got in 49 months fightin' the Taliban, it was my day. They
6 were going to get to me anyway.

7 Q Did you think, you know, when somebody shows up to a rally like that in
8 body armor or looking like that, how do you think that affects kind of their presence at
9 the rally or people's mood, or when they see them, or interact with them?

10 A I believe that it postures you've immediately escalated force by having body
11 armor. So now the threat -- your threat level is already up. And some people, you
12 know, the people that are on your team, so to speak, they are, "Oh, look at those cool
13 guys." And other people are like, "Why are those fat, out of shape, 40-year-old men
14 wearing body armor?"

15 And then the other party, you know, the people that want to attack those people,
16 now they know where they're all at, because they all look the same and they all have
17 body armor on. So it's pretty easy to figure that out.

18 So I think it changes the threat assessment for everybody involved, is what I -- is
19 how I would answer that.

20 Q Okay. Let's talk a little bit more about kind of the lead-up specifically to
21 January 6th, so after the December timeframe.

22 When did you first learn that December was going to be -- oh sorry, that January
23 6th was going to be a big event?

24 A I can't answer that truthfully. I'm going to probably say -- Trump said
25 something, maybe like a week prior. And I would say when he said something, I

1 understood that it was going to be a large event.

2 Q Was that -- and we can actually pull up exhibit 5, if we want to look at that.

3 Was that a tweet from President Trump, do you recall?

4 A I don't know if it was a tweet or I don't know if it was -- if it was a -- I'm
5 reading that right now.

6 Q Yeah. You can take a second just to read that.

7 A I don't know if it was a tweet or if it was something he said. Knowing the
8 President, I would assume it was a tweet. So I would guess that's correct, that I
9 probably saw a tweet. I don't think it would be that one. But --

10 Q So this is a December 19th tweet from President Trump. And I'm just going
11 to read the tweet for the record real quick.

12 "Peter Navarro releases 36-page report alleging election fraud 'more than
13 sufficient' to swing victory to Trump. A great report by Peter. Statistically impossible
14 to have lost the 2020 Election." And then this is sort of the relevant part. He says,
15 quote, "Big protest in D.C. on January 6th. Be there, will be wild!"

16 Do you remember that "will be wild" statement?

17 A I've got a hard time remembering what I ate for breakfast yesterday. So
18 that probably wouldn't have excited me.

19 Q Okay.

20 A I don't remember the "will be wild" part of that. And I want to say I saw
21 something different that was more Trumpy, that was more like 30 characters, that said,
22 "Come to D.C.," or something, "I got something big."

23 I want to say what got me interested, he said, "I have something very important to
24 say on January 6th," or something like that, is what got me interested to be there.

25 Q Okay. In the lead-up to January 6th, did you hear about Proud Boys

1 coordinating with any other groups or making plans for January 6th with any other
2 groups?

3 A No. What I can tell you is what I heard about Proud Boys is this: Do not
4 go to Washington, D.C., wearing a Fred Perry on January 6th. Do not wear any Proud
5 Boys merchandise. Do not do anything. You go there, you're going to support the
6 President or participate in First Amendment rights, but you are not going there as part of
7 the club.

8 And it was very adamant that the -- and I don't know the guy's name, but that
9 local president there in Washington, D.C., was very adamant you will not wear
10 shit -- pardon my language -- you will not wear your dumb shirts or anything like that in
11 my area, because it affects me, not you, because you get to go home, I have to stay here.

12 Q Okay. I want to ask you about some Parler messages from Tarrio, kind of
13 on that same theme, but I think a slightly different message. If we can pull up exhibit 8.

14 So this is a post from Enrique Tarrio on December 29th on Parler. And the
15 relevant part I'll just read for the record.

16 "We will not be wearing our traditional Black and Yellow. We will be incognito
17 and will spread across downtown D.C. in smaller teams. And who knows...we might
18 dress in all BLACK for the occasion."

19 Do you recall that message from Tarrio?

20 A I recall that message. And I think I've got a little -- maybe a little bit of
21 context for that as well.

22 Q Okay.

23 A "We might dress in all BLACK for the occasion," that was an obvious troll to
24 antifa, saying, "Hey, we're going to look like you when we do this," because they got
25 exposed for wearing MAGA gear and stuff like that at the rally prior. So he said, "Hey,

1 we can play that game too."

2 I don't know anything about the, "We will not be wearing our traditional Black and
3 Yellow. We will be incognito and spread out across downtown in smaller teams." I
4 think that's internet character talking, because I know very specifically if there was a plan,
5 I wasn't involved in it. And I didn't know about it, either.

6 Q Okay. So --

7 A [Inaudible] to see anybody except Enrique in D.C. that day. And we were
8 going to go up to his hotel room afterwards and just catch up.

9 Q Okay. I just want to be clear, because we've got kind of two different
10 messages happening. One -- and we'll take the D.C. Proud Boy leader first. He said not
11 to wear Proud Boy gear in his area or to visibly associate yourself with Proud Boys. Why
12 did he say that?

13 A Because there was a belief, remember the two sides, there was a belief by
14 one side that we shouldn't even be wearing that, the black and yellow, we should not
15 wear that because it makes us easily identified. Like, people can spot you out. And
16 that shirt had so much -- so bad of a stigma almost from its inception that guys were long
17 ago wanting to separate themselves from that, from a uniform, that that was not cool.

18 And then you had the guys that wore the Hawaiian shirts, and then the Boogaloo
19 Boys ruined that for us, because those psychos are weird.

20 So I think that answers the question -- or the first part of your question. And I
21 think there's a second part?

22 Q Yeah. And the second part was just it seems like Enrique Tarrio's message
23 is different. His seems to be more of a strategic choice about countering or dealing with
24 antifa. Is that right?

25 A I could agree with what you said there, but I also think we're reading too

1 much into it, that I don't think he believed that. What he said, I don't think that was the
2 truth. I think that's just something that would get him whatever retweet on Parler is
3 called and shares in the news media and maybe a couple interviews to do and help build
4 his brand.

5 Q Okay. But there did end up being people, that Proud Boys dressed in all
6 black to -- as Tarrio directed, right?

7 A If there were, I'm not aware of that. I've seen photos of some of the guys
8 that day and I don't remember seeing one in all black. And I could be wrong, but I
9 don't personally know that to be true.

10 Q Do you remember -- I know you're friends with Ethan Nordean. Do you
11 remember seeing what he was dressed in?

12 A I don't, but I'm going to guess he was wearing a black long sleeve shirt and
13 his plate carrier that had a RWDS on it in red. That's just my guess. Maybe a black ball
14 cap.

15 But that's what he wear -- that's his uniform. That's what he wears all the time.
16 So I wouldn't say Tarrio directed him. And Enrique Tarrio is not telling Ethan Nordean
17 anything, to do anything he doesn't want to.

18 Q I think we have -- we can just look at what Nordean wore on that day. If
19 we can pull up exhibit 19.

20 A Yeah. I was close.

21 Q Yeah, pretty close. I mean, would you describe that as this looks to be
22 what Tarrio directed folks to wear, right?

23 A Well, you could say that. Like, I can -- I agree with what you're saying, that
24 what we just read and what he's wearing is similar, but we can also look at the other
25 people behind him and they're not wearing that.

1 Q Right. Some of what I want to get at and what we'll discuss a little bit is the
2 extent to which you think you were in the know on what Tarrio was directing people to
3 do or not.

4 So I guess I'll just start with a question for the 6th in particular. Do you think that
5 you were excluded from some of the plans about -- that Tarrio was involved in, or this
6 might be an example of wearing all black or trying to be incognito? Would you have
7 been left out of conversations about countering antifa or some of the more extremist
8 activity?

9 A I believe I would have been left out of those conversations. I don't think
10 they ever -- like, I've never been in a, quote, unquote, planning chat of any type. But I
11 also recall seeing the clear message that was being given to the dudes was don't go, don't
12 do anything stupid, this.

13 Now, then you get those public messages that you just read, but behind closed
14 doors, what I saw was a different message. But, again, like you said -- like I already
15 answered, I probably would not be included in anything that involved, like, being a rally
16 boy, because they just wouldn't do that.

17 Q Okay. I just want to focus a little bit on who was sending the messages
18 about either don't go or don't go as a Proud Boy. You said it was the leader of the D.C.
19 chapter? Is that right?

20 A He was saying don't wear any colors. Enrique Tarrio was saying the don't
21 go or don't go as a Proud Boy. That was Enrique's messaging in public -- or, I'm sorry, in
22 the private chats, was, "Hey, everybody needs to be real careful here, like, this -- you're
23 going to get in a lot of trouble if you eff up here," is kind of what Enrique's message was.

24 Q Okay. Is there anybody else that you can think of that was sending the
25 other message, which was don't go at all, don't go associated as a Proud Boy?

1 A I would say almost the entire south was probably echoing that message.
2 And then some people out in the West Coast, maybe some guys in Arizona were
3 probably -- I'm just thinking of everybody that's like me and has like similar thoughts as I
4 do. And it's pretty much you those people.

5 Q Okay.

6 A It was more, like, I think more of the East Coast guys were real excited to go
7 to it. A, probably because it was a lot closer. And a lot of other people were just like,
8 "Eh, this has been-- we've played our hand here. We don't need to, you know, we don't
9 need to do any more."

10 Q Just a quick question. Is there anybody in the room with you right now?

11 A No. There isn't.

12 Q Oh, okay. I thought I had seen somebody, somebody else moving.

13 Okay. Then I'm going to ask this question, though I take it the answer is probably
14 no.

15 Did you hear about Proud Boys associating with -- we started to talk about this
16 question earlier -- associating with or making plans to go with any other groups for the
17 6th?

18 A No. I want to say there was a very public feud on Parler between, I want to
19 say, PB and Oath Keepers, or maybe it was the Three Percenters, that there was -- we
20 didn't like each other. Because, if I remember correctly, there were a couple physical
21 altercations in December that they weren't happy about, because they lost those
22 altercations. But I don't know exactly if that's correct, but I think I remember that being
23 the case.

1

2 [4:07 p.m.]

3 BY MR. ██████████

4 Q Okay. I want to talk a little about that public feud versus maybe
5 some -- some things that were going on in the background that maybe you were privy to
6 or not.

7 So if we could pull up exhibit 6.

8 So I was asking you about alliances between or -- or organizing with other groups.
9 And so just for the record, and I'll represent to you, this is a Facebook message from Kelly
10 Meggs.

11 Do you know -- does that name mean anything to you? Do you know who Kelly
12 Meggs is?

13 A It doesn't.

14 Q Okay. He's an -- he's an Oath Keeper from Florida, and this is a private
15 message he sent on Facebook on December 19th. And he said: We are all ready for
16 the rioters this week. I organized an alliance between Oath Keepers, Florida Three
17 Percenters, and Proud Boys. We've decided to work together and shut this shit down.

18 So I take it you didn't hear any -- anything about this alliance between the groups?

19 A No. I -- I have no idea about any alliance.

20 Q Okay. Would it be -- I remember at the beginning of the deposition, we
21 talked about how you and Tarrio are friends, but you kind of had this fake feud online
22 because that was a way to, I don't know, diffuse the animosity between different groups
23 in the Proud Boys.

24 Was it common for there to be staged or fake feuds between members of the
25 Proud Boys or between Proud Boys and other organizations?

1 A No. I -- I think that's -- that's purely my gimmick or my bit, was -- that
2 was -- that was a creation of me. Just one day, I was sitting there and said, hey, let's
3 pretend like we hate each other and see how many people we can trick. And he said, all
4 right, I'll do it.

5 Q Is that -- I mean, so that's one example of it, but is that sort of -- and then
6 you also talked about people playing certain characters online. I mean, is that sort of
7 misdirection in what you say to the public versus what you're saying in private something
8 that you see among the Proud Boys?

9 A I would say probably. That is probably true, because a lot of guys don't
10 really want people to know what we're doing, and so -- so they just stay secret. But me,
11 for example, when I had a large social media presence or this or that, let's say I was going
12 to Miami, I'd show a flight itinerary, flying to New York, and get people -- get people riled
13 up thinking I'm going to New York City and then just slide into Miami under the radar
14 or -- or -- so I would say the misdirection is a thing.

15 Q Okay. In other -- so you said that you weren't part of any planning chats or
16 group chats about January 6th. Is that right?

17 A Correct.

18 Q Okay. Did you hear about anybody else being involved in any of those sorts
19 of chats?

20 A I didn't. I -- I -- God's honest truth, I didn't think there would be one. I
21 thought guys were going to honor what we were saying in private and -- and not go show
22 our asses.

23 Q Okay. So does the -- does the term "Ministry of Self-Defense" mean
24 anything to you, MOSD?

25 A The only reason I know about what that is, is I think that chat was mentioned

1 in Enrique's indictment, perhaps. And I was on the phone with somebody yesterday,
2 and he was -- I hadn't seen the indictment yet, and he was reading it to me, and I was
3 going, this isn't good.

4 And I'm trying to think if I ever was in that MOSD, but I don't think I was. Like, I
5 was thinking very hardly about that last night, because I figured this question would be
6 asked. I don't think I was. I'm pretty sure I wouldn't be, but sometimes chats start as
7 one thing and change. So I could've been in that chat before it was named that and
8 then left it or they removed me or something like that.

9 Q Do you -- I know we talked about trying to find some of those chats or
10 producing them. Have they been deleted? Why -- you said you were trying to
11 remember if you were on those chats, but were you -- would you be able to just pull up
12 your phone and look at Signal or Telegram and see if you were on them?

13 A I wouldn't be able to. I think, right now, I'm in like four chats. I got my
14 Telegram set up, like, if I don't talk somewhere, it just deletes me from it, it deletes
15 my -- because I don't want -- I don't want to get screen shotted and be put on Twitter
16 ever again in my life. So I stay kind of private. And most of the time, to be honest, I
17 use my phone to talk to people I want to talk to, instead of, like, Telegram, because I'm an
18 adult, and nothing I'm going to say is going to be incriminating or illegal. So I don't really
19 have a -- a hard time just telling people things.

20 Q Did -- do you recall around that time, the January 6th timeframe, or right
21 after January 6th, deleting any chats?

22 A I'm going to say I didn't. I don't know -- I wouldn't say, oh, January 6th just
23 happened and I deleted a bunch of chats, because I -- like what I've said many times
24 before, I didn't commit any crimes while I was there, so I didn't really have anything to
25 hide. If -- if they got my phone, you'd just read a lot of bad jokes.

1 Q Did -- leading into January 6th, we've talked about a couple of the different
2 leaders around that you're familiar with, or presidents. So, like, Zach Rehl is one of
3 them. Were you in -- I'm going to go through a couple different individuals, but did you
4 talk with Zach Rehl at all leading into January 6th?

5 A Good question. Probably. And if I did, it would've been via text message.
6 I probably could look -- I probably could find that information, but I may -- I'm going to
7 say my interaction was, hey, if you're going up for the 6th, I'll probably see you some -- I'll
8 probably see you there. I'm flying in, blah blah blah, blah blah blah. If I had an
9 interaction with him, that would've been it.

10 Q Okay. Yeah, I might have you -- we don't have to do it right now, but I
11 might have you go back and look and if you can see if you have texts with Mr. Rehl.

12 How about Ethan Nordean, did you have any conversations with him leading into
13 the 6th?

14 A I didn't even know he was there until I saw that picture you showed me. I
15 saw that somewhere on the internet and was, like, oh, he was there? I didn't know.

16 Q Do you know -- do you know Biggs?

17 A I do. I have a strange relationship with Biggs. We don't have a -- like a
18 text messaging relationship. We used to follow each other on Twitter a long time ago,
19 and we both were in the 82nd Airborne Division, so that's, like, where our bond is.

20 Q Okay. And then, sorry, quickly going back to Nordean and Rehl, are you
21 aware of fundraisers that they did for January 6th? Does that ring a bell for you?

22 A I want to say -- I knew the Philadelphia guys were raising money to buy a
23 bus. I don't know if that was pertaining to January 6th, so -- but I don't know anything
24 about Ethan.

25 Q Okay. Let's just try to refresh your recollection or let me know if this

1 triggers any memories, but if we could pull up exhibit 16, and then we'll go to page 9.

2 So what we're pulling up right now, exhibit 16, is that indictment that we were
3 just talking about, the one that came down yesterday involving Enrique Tarrio and other
4 Proud Boys, including Nordean and Rehl, and some of the other individuals we've talked
5 about.

6 So let's go to page 9. Or actually, it should be paragraph 35.

7 Yeah. Let's see, so paragraph 35, I'll read it for the record: On December 27,
8 2020, Nordean created an online crowdfunding campaign that solicited donations for
9 protective gear and communications to be used by the Proud Boys on January 6, 2021.
10 Nordean shared a link to this crowdsourcing campaign on his social media page and
11 encouraged others to share it on their social media pages.

12 Does that -- does that jog your memory at all?

13 A It doesn't. Obviously, because I'm reading this, I believe it's true, but I
14 wasn't aware of it.

15 Q Okay. Did you ever hear of any --

16 A But I'm going to guess -- I'm going to guess that was done on GiveSendGo.
17 I think I saw a couple of these on GiveSendGo that were similarly worded to that, but I
18 don't --

19 Q Okay.

20 A -- remember Ethan specifically doing it.

21 Q Okay. You can pull down the exhibit for now.

22 Did -- did you hear about anybody else raising money specifically for, as that said,
23 protective gear or communications devices?

24 A I know I saw some, but I can't remember who it was. Like -- and I can't
25 remember if it was during your timeframe, like the timeframe we're talking about, or if it

1 was before or after. But I know people were sharing them in chats and so I saw them,
2 but I can't remember who -- who was doing it.

3 Q Did -- did you ever talk to anybody about why they were raising money for
4 communications devices or protective gear?

5 A Probably not. More than likely, no.

6 Q Okay. Did you ever hear anybody talking about buying, like, radios or
7 communications devices like that?

8 A I know my -- like, some of my guys were like hip into buying some sort of
9 radios, and I was like, why do we need radios because we got these things? I'm holding
10 up my cell phone for the court reporter. Like, these are just as good as radios. And
11 they were -- something about they could jam. I'm like, well, they can jam your radio
12 too. Don't you know anything about communications: Like, they can jam your cell
13 phone, they can jam your radio.

14 So we know -- like, I never bought any. I know one or two dudes that bought
15 radios. And the weird part about it is they got -- I want to say they got the idea from
16 antifa, because that's how antifa was communicating was with little -- they look like little
17 Icom radios that we used to use in the Army.

18 Q Was it --

19 A I don't know what the brand of them or anything.

20 Q BaoFeng, does that sound familiar, BaoFeng radios?

21 A That does.

22 Q Do you know where your other -- so I assume you mean other people in the
23 Music City chapter. Do you know where they would've gotten the idea or heard the
24 message that other Proud Boys were buying these radios?

25 A When you -- I want to say probably that November rally. That -- for some

1 reason, that's when the -- it was trendy to have a radio on your body armor. So I think
2 that's -- it was more of a "I want to fit in" rather than a "I need this radio to talk."
3 Because just from memory, if memory serves me right, them guys trying to use
4 those -- those radios was a shit show. They didn't know what they were doing. They
5 didn't know how to fill them. They didn't -- they didn't know how to operate the
6 equipment. So the radios, now they just were carrying them around and they weren't
7 able to talk on if -- and I want to say that was at the December rally that I was at. I
8 don't -- I'm sure radios existed on January 6th, but I didn't see anybody with them.

9 Q Okay. Is there anything else like that -- so you're talking about how radios
10 were used in November and kind of became in style or everybody felt like they wanted to
11 get a radio. Were there any other kind of strategies or -- or gear or anything that
12 happened in the November, December rallies that you saw carry over into the January
13 rallies, kind of like those radios?

14 A I don't think so. I'm trying to remember when body armor became trendy,
15 but I think that was way prior to anything that happened in D.C.

16 Q Okay. We just talked about the radios quickly, but when you were in D.C.,
17 were you involved with anybody trying to program their radios for particular frequencies,
18 or do you remember any conversations or meetings about that?

19 A I know they were doing it. I wasn't -- I wasn't around them, but I'm aware
20 that happened. It didn't happen in my room. I don't know -- excuse me -- I don't know
21 where it happened, but just when you're walking around a bunch of dudes, I have -- I
22 heard, like, hey, we got to -- we got to fix these radios tonight or we can't -- or we're not
23 going to be able to talk.

24 And that's when I -- that's when I found out they actually had like fills in them and
25 stuff. I thought they were just like, you know, talk about radios. Like, I didn't

1 understand they actually had encryption. I thought that was neat, but I didn't
2 understand the purpose for it.

3 Q Do you remember, was it guys in your chapter that you heard those
4 conversations -- were having those conversations?

5 A No. Because in my room, we didn't have -- we didn't have any radios,
6 so -- Todd might've. I don't think he did. I think he got his radios after January 6th.
7 I -- I can't remember, but I don't -- there wasn't any talk about filling the radios or this or
8 that around me.

9 Mr. [REDACTED] Okay. Great. We've been going for about another hour now.
10 Why don't we take a quick break. It's 4:22. Let's come back at 4:30. How's that?

11 The Witness. Got you.

12 Mr. [REDACTED] Okay. Great.

13 [Recess.]

14 Mr. [REDACTED] So we're back on the record.

15 BY MR. [REDACTED]

16 Q I wanted to ask you about a couple other people that you might've been in
17 contact with before January 6th. One of them is Amy Harris. Do you know Amy
18 Harris?

19 A I do.

20 Q Okay. And what -- what's your relationship with her or how do you know
21 her?

22 A I want to say I met Amy in December at the -- at the rally. Enrique
23 introduced me to her, and we just kind of maintained conversation. She's actually from
24 Clarksville, Tennessee, originally. So that's our odd bond. And every now and again,
25 we'll go get lunch or something like that. But all I'm -- from what I understand, she's

1 working on writing a book or something --

2 Q Okay.

3 A -- or maybe perhaps some sort of documentary.

4 Q Can you -- leading into January 6th, were you talking with her at all about
5 plans or what January 6th was going to be like?

6 A I don't think so. Probably not, because -- I think we exchanged phone
7 numbers in December. And I can't remember what we talked about, but I don't think
8 we talked about January 6th. Maybe there was a message exchange where I asked her
9 was she going to be there or something along those lines.

10 And now that I'm thinking about it -- you jogged my memory a little bit -- we were
11 talking, because she knew when I was flying in, she knew when I was flying out, things of
12 that nature, but not -- I wouldn't say anything about planning. It was more we were
13 giving each other our itineraries.

14 Q Okay. Did you ever -- had -- but other than December and then in January,
15 had you met her in person in between?

16 A I don't think so, just because the timeline would've been so tight. We
17 did -- we did have lunch, but I think it was after the 6th. I believe it was after the 6th.

18 Q Okay. And then let's talk quickly about coordination with other chapters of
19 the Proud Boys. Were you -- were you in communication with any other presidents or
20 any other chapters about your plans to go to D.C. on the 6th?

21 A As previously stated, maybe Zach Rehl -- I'm not sure on that -- Enrique
22 Tarrio. I don't think any -- any other people of note that I was in contact with about my
23 plans. I was -- I was -- when Enrique got arrested that first time, I actually was scared
24 that they were going to arrest me because I was the orange shirt guy.

25 There was folklore on the internet that I was the leader of the Proud Boys because

1 I had the different clothing on, you know. But -- so -- to be completely honest and
2 truthful, I was terrified, I've been terrified since this morning that I was going to be
3 arrested.

4 Q When you say -- when you're talking about Mr. Tarrio getting arrested the
5 first time, you mean January 4th, and the second time was yesterday?

6 A Correct. When he got arrested for the -- allegedly burning a Black Lives
7 Matter flag and having the high-capacity magazine, that arrest.

8 Q Okay. Yeah, we're going to talk about that in one second.

9 What were -- what were your conversations like with Enrique leading up to the
10 6th and about plans for the 6th, what were you guys talking about?

11 A I don't think we talked a whole lot, but I remember shooting him a text.
12 I'm pretty sure I shot him a text where it said, hey, dude, I'll see you this evening, or
13 something like -- something along those lines. And I forgot that he didn't drink alcohol,
14 and I had bought him a Single Barrel Jack Daniels from the airport just as a -- a gift, which I
15 never was able to give him. But then he -- he did tell me, dude, you know I don't drink.
16 And I went, I forgot, dude. So that was -- that was about the extent of our conversations
17 about January 6th.

18 Q Okay. Did any other -- I'm going to name a couple different organizations
19 and groups quickly, and just let me know, one, if they mean anything to you, and, two, if
20 you had any communications with them leading into January 6th. The first is an
21 organization called Women for America First.

22 A I know who they are. I've never spoken with them.

23 Q Okay. And then there's -- there's an individual associated with Women for
24 America First named Charles Bowman. Does that name mean anything to you?

25 A No.

1 Q Did -- we've talked about Oath Keepers already. Did you ever -- were there
2 any particular Oath Keepers that you ever met or that you knew personally?

3 A I've never met an Oath Keeper, to my knowledge.

4 Q Okay. How about 1st Amendment Praetorian, does that group name mean
5 anything to you?

6 A Sounds pretty Nazi, but I don't know anything about them.

7 Q Okay. And some of these are not -- you know, I'm not asking if you're
8 associated with them. Some of it also is just, did you hear people talking about these
9 groups.

10 How about -- so I know you said there was an online feud between Proud Boys
11 and Three Percenters. Did -- did you ever talk to any Three Percenters or hear of
12 anybody communicating with Three Percenters?

13 A I actually had communication with a couple Three Percenters in Tennessee.
14 Don't know what their names are because I forgot. I probably could scroll through my
15 phone for 3 days and find it, but I -- I wasn't impressed, and they were kind of weird.
16 And what I can tell -- what I gather about the Tennessee Three Percenters and the Patriot
17 movement is they're really divided too. Like, they have their really psychopath guys that
18 want to train every day, and then they have their guys that just kind of want to be in a
19 men's club and go hunting and fishing together.

20 Q Do you know, it's a -- a Proud Boy named Robert Gieswein?

21 A I want to say yes, but I'm not -- I'm not sure.

22 Q Okay. He -- there's -- there's photos of Robert Gieswein, and he's using
23 signals or hand signals that are associated with Three Percenters. So you don't know of
24 any overlap between Proud Boys and Three Percenters?

25 A I don't -- I don't think there -- if there is some overlap, there's not a whole

1 lot, but I'm not aware of it.

2 Q Okay. How about any other -- any other militia groups that you know of
3 anybody coordinating with?

4 A I don't think they're coordinating with the militia groups. Like I said before,
5 there may be some -- some sprinkled overlap, but I would -- I would not say that dudes
6 are coordinating with those -- because those guys, those militia guys kind of rub a lot of
7 dudes the wrong way because they have whacky ideas and plans, and that's how you go
8 to jail.

9 Q I'll -- there's a -- actually, if we can pull up exhibit 19 again.

10 Q This was the photo that we looked at earlier of Nordean, but I'll pull it up for a
11 different reason now. If we zoom in a little bit, that guy on the right, he's labeled as
12 Birdsong?

13 A Yeah.

14 Q He's associated with a group called the Panhandle Patriots Riding Club.
15 Have you ever heard of Birdsong or the Panhandle Patriots Riding Club?

16 A I have not heard of either.

17 Q Okay. You can pull that one down.

18 Q All right. And then also sort of in the lead-up to January 6th and any planning or
19 preparation, I know you said you talked to Enrique. Did -- did you ever hear about him
20 talking about the importance of marching on the 6th, like, getting into marching order or
21 a marching line?

22 A No.

23 Q Okay. And then did you ever hear -- so, actually, let's -- I'm going to show
24 you a video, if we can pull up exhibit 14.

25 Q And, again, I kind of want to use this to, one, either jog your memory or let me

1 know if you ever heard of any conversations that sound, you know, sort of like what
2 Enrique, and this is Amy Harris, if you recognize her in the video.

3 You can go ahead and play the video.

4 [Video shown.]

5 Mr. [REDACTED] Can you hear that?

6 The Witness. I can't.

7 Mr. [REDACTED] Let's -- let's pause that real quick, and if we can turn up the volume,
8 and then, Matthew, if you can turn up the volume on your computer.

9 The Witness. Okay. I'm up.

10 Mr. [REDACTED] Okay. I think we can -- let's try it again.

11 [Video shown.]

12 BY MR. [REDACTED]

13 Q Okay. So that -- I don't know, were you able to hear most of that?

14 A Yeah, I think I got most of it.

15 Q Okay. So one of the things I wanted to ask you about is that Tarrio there
16 talks about a meeting that was 2 hours or longer, and where he spent at least half -- 30
17 minutes of that meeting drilling Proud Boys about marching on the 6th. I take it that
18 you didn't participate in that meeting. Is that right?

19 A No. And I think that -- that meeting, just to provide commentary, what is
20 Enrique Tarrio going to teach a bunch of combat veterans about marching? Nothing.
21 You know, so that -- again, I think that was for show. I don't know. Because most of
22 those guys that are in your photograph that I know are combat vets, so they served.
23 They got a couple years in the armed services.

24 Q Does it surprise you that there was this long 2 or 2.5 hour meeting that you
25 weren't involved in or didn't know about?

1 A It doesn't surprise me at all, because I probably was on an airplane, and,
2 again, like I -- like I keep reiterating, they wouldn't invite me to that. I just show up and
3 drink beers and -- and have an attractive young lady on my arm that night. That was my
4 involvement in the club.

5 Q Understood. Okay. We're going to -- over the next, you know, 20, 30
6 minutes, I'm going to show you some more things that are kind of like this video and that
7 are some of the -- the chats that we've talked about, like the MOSD chat and that sort of
8 thing.

9 And so I understand that you weren't on these chats, but what I want to get from
10 you is your perspective on those chats and then also whether or not the things that
11 Enrique Tarrio's talking about, see if you can add some color to those for me, if you ever
12 had conversations like that with him.

13 So if we can pull up exhibit 16, and this is the indictment again. And let's go to
14 page 11, paragraph 38.

15 And at any point, Matthew, if you want to take a second to be able to read what
16 we're looking at, I'm going to point out particular parts and you can read them, but just
17 let me know if you need more time or want to see something around for context.

18 A Yes, sir.

19 Q So looking at 38, I'll give you one second -- or a little bit of time to read
20 paragraph 38, and just tell me when you're done.

21 A Okay, I've read.

22 Q And then there's a little bit of paragraph 38 on the next page, if we can scroll
23 to that.

24 Okay. So I just wanted to ask, generally we've talked about Mr. Tarrio's public
25 persona, where, you know, you say he might put something out there just to mess with

1 the media or mess with antifa. But these are chats -- private group chats with just Proud
2 Boys. This particular chat is called MOSD Prospective Group. And so I just want to get
3 your understanding of this or your reaction to it really.

4 He specifies we'll have a top-down structure. This was a chat on December 29th,
5 and he's talking about a virtual meeting on December 30th. And he describes this
6 top-down structure. If that's something you're not comfortable with, then they should
7 just not attend the live session.

8 What do you think -- what's your reaction to these private messages that Tarrio
9 was arranging, that I know you weren't involved in, but if you can just respond to those?

10 A Okay. Like, my first -- my initial knee-jerk reaction to this is it appears as if
11 he was trying to establish a command and control, and perhaps if these guys had a,
12 quote/unquote, chain of command, that now they would be better managed and it
13 wouldn't potentially turn into a shit show, for lack of better terms. They would just be
14 more organized. That's my initial knee-jerk reaction to that.

15 Q Okay. And then if we can roll down -- scroll down to paragraph 41, and I'll
16 give you some time to read it.

17 A Which one? 41?

18 Q Yep, 41. It's the one that's on the screen right now.

19 A Oh, that's the Oath Keeper who'd sent that.

20 Q Do you know -- sorry -- do you know that? Or tell me how you know that's
21 an Oath Keeper.

22 A Apparently, after this, there was some meeting in a garage. This was
23 explained to me yesterday as -- as I was going through this indictment with a friend of
24 mine. He was kind of giving me the -- giving me the CliffsNotes of it. And I remember
25 this, and he was able to identify who that guy was.

1 Q Okay. Would you recognize the name if I told you?

2 A If you said it, I would recognize it.

3 Q Was it Stewart Rhodes?

4 A Stewart Rhodes, that's it, that's right.

5 Q Okay. And is the friend that you were talking to a Proud Boy?

6 A Yes.

7 Q Okay. And did he have -- did this person know, like, for a fact that that was
8 Stewart Rhodes, or -- or he was just speculating?

9 A I don't know how he knew. I remember -- I remember him telling me about
10 it yesterday. And he -- what stuck out to me is the nine-page document titled "1776
11 Returns." That's -- I remembered that from that conversation --

12 Q Okay.

13 A -- and the Stewart Rhodes name.

14 Q Was -- is the person that you had this conversation with somebody that was
15 at January 6th?

16 A No. I don't think he's ever went to a rally ever.

17 Q Okay. Did -- did he say or have you ever heard of anybody actually having
18 this nine-page document, 1776 Returns?

19 A No. He was kind of caught in a -- like, I don't know how he knew so much
20 about it right away, but he was kind of taken aback by it, by the notion that this and the
21 potential meeting in a garage occurred.

22 Q Okay. Do you -- have you ever heard anybody else talk about this 1776
23 Returns document?

24 A The first time I heard about it was because of this document.

25 Q Okay.

1 A It was yesterday, is when I heard about it.

2 Q Okay. Let's -- and then I guess I'll just also take kind of your take or your
3 reaction to -- to this paragraph. Does it surprise you that Tarrio was in communication
4 with Oath Keepers and exchanging documents like this?

5 A It does, but -- it does surprise me.

6 Q Do -- have you -- did your friend discuss or have you had any other
7 conversations about any other Oath Keepers that you can remember? We mentioned
8 Kelly Meggs before. I think you said that name didn't ring a bell, right?

9 A Yeah, I don't know that name.

10 Q Okay. Any other --

11 A I don't know -- the only Oath Keeper I know is that Stewart Rhodes guy, and
12 the only reason I know his name is because I heard it yesterday.

13 Q Okay. Okay. We can take the indictment down for a second.

14 Let's talk about your heading up to D.C. for January 6th. Who did you -- who did
15 you travel with and who did you -- or when did you arrive in D.C.?

16 A I -- I traveled alone. I flew on an airplane to get there, and I think I actually
17 landed in D.C., if I'm not mistaken, and I arrived in the neighborhood of noon, in the
18 proximity of noon.

19 Q Sorry, on what day?

20 A On the day of the 6th.

21 Q Okay.

22 A So I was a little late to the show because there was a flight issue the night
23 prior. I was supposed to be there on the evening of the 5th, but I didn't arrive till the
24 morning of the 6th. I got there --

25 Q Oh, sorry, go ahead.

1 A I got there, I got on the -- whatever the little train thing is called -- I think it's
2 the Amtrak -- and I rode -- there's a get-off point like by the Marriott, if I'm not mistaken.
3 I got out there, linked up with a couple of my buddies, and I was starving, so we went to
4 go to the -- Harry's to get a burger.

5 Q Okay. Let's stop there for a second. Maybe I had misunderstood you or
6 misheard you earlier. I thought you had said that you were with Tarrio on the 4th when
7 he got arrested or you were with him when he got arrested, did you say?

8 A No, that's -- that's incorrect.

9 Q Oh, okay. Okay. So you arrived then, sorry, you said around noon on the
10 6th?

11 A Yes.

12 Q Okay. And who were the folks that you met around the Marriott?

13 A Dudes from my local chapter.

14 Q Okay. And they had traveled up separately?

15 A Yeah. They -- there was like a caravan of tour buses coming from
16 Tennessee apparently. They were with that crew.

17 Q Okay. But it sounds like you were aware of Tarrio's arrest on the 4th. Did
18 that affect your plans at all, or how did that -- or tell me how that affected your plans.

19 A I almost didn't go because I, again, was terrified to fly into a city that I
20 thought was going to arrest me. But then I said, I already paid for the thing and I
21 haven't done anything illegal, so I'll just go. So, no, him being arrested really didn't alter
22 my plans at all.

23 Q Okay. And then for the folks that came up on the caravan of buses that you
24 talked about, the tour buses, do you know anything more about that -- that group of
25 buses? Was it associated with a particular group, or how did that get organized?

1 A Complicated answer, because there were probably 10 different groups that
2 were involved, like -- like, there was a church group. There was -- there was all sorts of
3 people that I would say weren't -- weren't there to get violent, that were mainly involved
4 in the organization and plan of that. I don't know who actually did plan it.

5 Q Okay. So on the -- on the day of the 6th, are you aware -- it sounds like you
6 arrived a little too late, but are you aware of a meeting of Proud Boys at the Washington
7 Monument in the morning of the 6th?

8 A I'm not.

9 Q Okay.

10 A I don't think I'm aware of that, so I'm going to say -- I'm going to continue
11 with no on that.

12 Q Okay. Once you arrived -- actually, let's -- let me pull up exhibit -- if we can
13 pull up exhibit 11.

14 These are some of the photos I'm sure you've seen that are publicly available and
15 online.

16 A Oh, yeah. Yeah, I've seen all those.

17 Q Is this -- is this the group of people that you met up with? Or tell me about
18 this photo.

19 A The original people I met up with were the gentleman on the left and the
20 guy in the black hoodie in the back. And I know Curt from -- from here.

21 Q Okay.

22 A But he wasn't at the -- the original link-up for the hamburgers. It was just
23 the guy in the back and the guy on the left.

24 Q Okay. And so that's -- and just for the record, in the photo, it's -- there's
25 three individuals holding up a hand sign, and that's the Proud Boys hand signal, right?

1 A Yeah.

2 Q Okay. And so there's three of you. Who are the other two that are
3 holding -- the other two Proud Boys?

4 A I'm -- I'm sorry. Which --

5 Q Who are the other -- the other two that are holding up the hand sign, who
6 are they, or what are their names?

7 A Do I have to tell you their names?

8 Q It is a deposition. You're obligated to answer all the questions that I'm
9 asking, unless you've got some sort of privilege objection to it.

10 So I'll ask you to name them. I will tell you that, based on what you've told us,
11 we're unlikely to follow up with these folks, but if you would name them, that would be
12 appreciated.

13 A Brad -- Brad -- Bradford Lewis is the gentleman on the left. The gentleman
14 in the back with the hand sign is Jeffrey Riggs.

15 Q Okay.

16 A And --

17 Q And -- oh, go ahead.

18 A And the guy with the -- the large, huge Black man is Curt Dennis.

19 Q Okay. And you -- and you said you know him from D.C.?

20 A I know him from Nashville.

21 Q Oh, from Nashville, okay.

22 So it looks like, from this photo -- and obviously we've looked at that other photo
23 of Nordean and others marching. But given the time of your arrival on the 6th and this
24 photo, it doesn't look like you marched to the Capitol with other Proud Boys, is that right,
25 other than these two?

1 A Correct, yeah. We -- we -- and I was -- I was with Alex Jones also, for -- for
2 honesty.

3 Q Okay. How did you join up with that group?

4 A We were in that hamburger joint and somebody came in here -- came in and
5 said, Alex Jones is right around the corner and he's walking to the Capitol. And we were,
6 like, let's see what this is about, this should be interesting. So we just kind of joined
7 that -- that rank and file.

8 And I got separated from all these folks while I was at -- like, the first time they
9 shot the smoke canister, the CS canister at Alex Jones when he was standing up on a table
10 or something, trying to disperse the crowd. After that, I didn't see these folks, until this
11 picture, again. Because they stayed back, because they had the women and stuff like
12 that, and they didn't want to get involved in what was happening next.

13 Q Right. Did -- I know you mentioned your fellow chapter member Todd,
14 who got stabbed on December 12th, was also in D.C. for January 6th. Did he march
15 with --

16 A No.

17 Q Oh, he wasn't?

18 A That's in -- he was -- he had an open hole in his -- in his body that would
19 prevent him from traveling or walking at that time.

20 Q Okay. I was going to ask about that. I was going to say, that would be a
21 quick recovery.

22 Okay. Were there any other members of your chapter that did march with that
23 larger group of Proud Boys that marched down the Mall towards the Capitol?

24 A I don't think any of us marched with a large group of Proud Boys, to my
25 knowledge.

1 Q Okay.

2 A If they would've marched with them, they wouldn't have been able to link up
3 with me at like 12:30, you know. Does that make sense?

4 Q Right, yeah. Understood. So then were there any more members of your
5 chapter other than these two there on the 6th?

6 A Yes. And I'm -- I'm trying to think who, but I'm having a brain flub, because
7 a couple of them I had just met that day. Like, they had known other guys, and I had
8 met them just that day. So I want to say there were probably four or five more --

9 Q Okay.

10 A -- making the total in the neighborhood of 10 probably, counting me.

11 Q Okay. And you all were part of this group that met up around 12:30 and
12 separately walked with Alex Jones towards the Capitol, not with a larger group of Proud
13 Boys?

14 A Correct, sir.

15 Q Okay. Did -- was that planned? Was that intentional? Did you not want
16 to walk with the other Proud Boys or -- or how did that end up happening?

17 A To be completely honest, I think it was a logistical problem, to be completely
18 honest, because I believe the buses that they rode in on were a little late to the party, and
19 they didn't fully understand how to get to, like, the Harrington. Like, the link-up point
20 was always the Harrington for my crew so we could then go all together.

21 And my flight was a little late. Their buses were a little far. So I think, to be
22 completely honest, it was a logistical issue and kind of, as I previously stated, we weren't
23 really there to tear shit up. We were there just to, like, be there together.

24 Q Okay. Were you in touch with any of the Proud Boys in the other group,
25 like, on the day as you were walking towards the Capitol?

1 A The only person I talked to that day was -- and I don't know his real name,
2 but you'll probably know it. Yut Yut was -- and it was because Amy Harris lost her cell
3 phone. And --

4 Q Okay.

5 A -- he called me to check that that was hers and see if I knew where she was.

6 Q Okay. Were you in touch with Amy Harris on the 6th?

7 A Sporadically. The plan was for us to meet up together, but we never were
8 able because the communication was so bad because there were seven million cell
9 phones in a square block. So the cell -- the cell phone reception wasn't good enough for
10 us to be able to talk. So we didn't link up, but I think we shared a few text messages.

11 Q Okay. What did you -- what did you guys text about?

12 A Hey -- probably, hey, where are you. There was probably an exchange of,
13 like, this is crazy, something along those lines.

14 Q Okay. But you -- but that was just by regular text message, not an
15 encrypted channel or anything?

16 A I'm -- I'm pretty sure the answer to that is yes.

17 Q Okay. Let's look at -- well, actually, why don't you just explain to me kind of
18 your movements on that day, and we'll go all the way through your experience at the -- at
19 the Capitol itself.

20 So you leave the burger joint, you hear that Alex Jones is marching towards the
21 Capitol, and that sounds interesting to you. So your group goes and kind of meshes with
22 him. And then what happens? Just take me through your day.

23 A I wish we had a map. I used to have a map. But we left the Harrington
24 and turned left, went up to whatever the next road is, turned left on that road. I want
25 to say 19th Street, maybe, or 9th. I think it was something with a 9 in it. We walked

1 straight down that street. Then there was some sort of like roundabout kind of deal
2 before the Capitol that we funneled through. And we were in the grassy field on the
3 side of the Capitol that had the scaffolding, that they were --

4 Q Okay.

5 A -- they were doing some construction or something on.

6 Q Yeah. On the west side.

7 A And I was standing there, and Alex Jones was doing Alex Jones things with
8 bullhorns. I can't remember what he was saying. But then they -- I started hearing
9 maybe some sort of riot control rounds. It sounded like maybe some rubber bullets
10 were being shot, and I could smell the tear gas in the -- in the air. Like, one landed right
11 next to us. And I think some flash bangs were being utilized as well.

12 So, to my recollection, Alex Jones was yelling on that bullhorn, telling people to
13 settle down or Trump was never going to come here and speak, they got to stop this, they
14 got to stop, yada yada ya.

15 But then we went around the building, like, we went around the left side if you
16 were looking straight at that scaffolding --

17 Q Okay.

18 A -- and we were in that open area in the back. The rumor -- the rumor in the
19 crowd is that's where Trump was going to talk from, was up there. So we're sitting back
20 there, and Alex Jones goes and he's talking to the Capitol Police, and he's saying, hey, if
21 you let me up them stairs, I probably can get -- I probably can get them down. So
22 they -- they agreed, and we went up them -- Alex Jones' security, some other people, and
23 me for some reason, just because I -- I thought that would be a good idea, went up the
24 left stairway, the one that had been kind of breached.

25 We went up there, and Jones, in my opinion, was successful in getting people

1 down. But I also think that may have created enough space for people to be able to
2 move, whereas before you couldn't move. And I think we were up there, and Jones'
3 security guy said, Alex, they're going to blame this all on you, we got to get out of here as
4 fast as possible. So we started down the stairs.

5 At that point, I think I heard about three or four flash bangs go off, and I looked at
6 the guy next to me, and said, F this, bullets are coming next. Like, I understand how this
7 works, bullets are coming next. And I got out of there, went -- if you turn left off them
8 stairs, I walked straight through there to a road. There was a bunch of food trucks on a
9 road, and I ate the crappiest hamburger I ever had in my life, and linked up with those
10 guys, and we started walking back because everybody was getting these text message
11 alerts, hey, curfew, curfew.

12 And we stopped and took pictures with Lady MAGA on the way out and went
13 straight to the buses. And I -- I said, hey, guys, can I just ride back with you all? I don't
14 really feel like -- I don't know how I'm going to be able to get to the airport.

15 Q Okay.

16 A And I rode back on the bus.

17 Q Okay. Let's pause there. Just a couple questions about that.

18 So it sounds like at some point, you were pretty close with Alex Jones and his
19 security group. How long did you stay with them, if you can guess, at the time?

20 A An hour.

21 Q Okay.

22 A Maybe an hour. An hour at the most, I'll say it that way.

23 Q Did you -- did you talk to his security group?

24 A I talk -- I remember talking to one of them, saying, man, this is wild, and he
25 goes, yeah.

1 Q Okay.

2 A He goes, yeah, it is.

3 Q You don't know -- you don't know who it was that was providing his security,
4 like, if it was a particular company or a particular group?

5 A They looked like a professional company. It wasn't like dudes on the street.
6 It was guys that were paid to -- to do security.

7 Q Okay. Let's pull up exhibit 12. This is another one of those photos that
8 I'm sure you've seen that's publicly available. This one, you're closer to the Capitol, on
9 the steps. And is that -- that's Alex Jones in the background?

10 A Yes.

11 Q Okay. And so is this once you've -- this is once you've come around to the
12 east side of the building, and you guys have gone up the steps?

13 A Yeah. That's -- the far left steps on the -- on the, as I'll keep referring to it,
14 the back side of the building.

15 Q The back side?

16 Okay. And at this point, you were separated from your other three friends from
17 your chapter?

18 A Correct.

19 Q Is that right? Okay.

20 At what point did you separate from them?

21 A Remember the -- when I talked about the flash bang or the smoke grenade --

22 Q Yeah.

23 A -- which was on the west side of the building? I don't -- I don't remember
24 seeing them after that.

25 Q Okay.

1 A And I could've -- I could've lost them before there. It might've been in that
2 roundabout, but I remember very much so that at that point I looked around to see
3 where everybody was, and they were not with me.

1

2 [5:13 p.m.]

3 BY MR. ██████████

4 Q Okay. So I know you mentioned that you were following Enrique Tarrio on
5 Parler around this time. Were you checking your phone during the day and looking at
6 anybody's tweets or Parler posts?

7 A The reception was so poor that nothing was happening. I think I tried to
8 look at Parler at one point and it just kept like the spinning wheel of death was
9 happening. So I don't think I was able to see anything.

10 Q Okay. Did you have any conversations with Tarrio after the 6th, either later
11 that day or shortly after?

12 A I might have text him that evening -- actually, I think I did text him that
13 evening, saying, "Hey, I'm out of here. I won't see you this time, buddy. The curfew,
14 I don't -- I just had to get home." Something along those lines is probably what we said.

15 Q Okay. So you, after you leave the Capitol Building -- or the steps of the
16 Capitol Building -- you met back up with your group around the food trucks, went back to
17 the bus, and then just took the bus back to Tennessee that night?

18 A Correct, sir.

19 Q Okay. When you got separated from your friends, did they tell you what
20 they did instead of following Alex Jones?

21 A They -- there was -- where that picture was taken, the one of us, that's at an
22 intersection. And they said they just hung out there.

23 Q Okay. Did, other than Tarrio, did you talk to any other Proud Boys either
24 that night or shortly after about kind of what happened that day?

25 A I think we -- the guys on the bus, like, we had a conversation about it. But I

1 don't think I talked -- I don't believe I talked to anybody else, because we were just having
2 a good -- you know, we were on a luxury coach tour bus. We were just having a good
3 time at that point.

4 Q Gotcha. Understood.

5 Let's talk quickly about -- so I want to go through a couple more, now that we've
6 kind of gone through your account of the day, I want to look at a little bit more of what
7 Tarrio was posting on that day and then some more of the messages in those MOSD chats
8 that we talked about, and, again, just sort of to get your reaction.

9 I understand you weren't on those messages, but we're just trying to
10 understand -- part of our mission is just understanding everybody's mindset, what led
11 them to do and say these things on the 6th.

12 And so, if we could pull up -- one second. It's exhibit 15. Sorry, 15, not 16.
13 Yes. And then if you can scroll down. Keep scrolling. And stop right there. Hold on
14 one second. That will be on page -- okay, yeah, if you scroll down a little bit more, the
15 next tweet.

16 So I'm just going to point a couple of these out and then we'll talk about them.
17 So these are Tarrio's posts to Parler on the 6th. So during -- and this is from the
18 indictment. I'm giving you some times, but this is around 2:30 or so that Tarrio posts,
19 "Don't fucking leave."

20 And then, if you continue to scroll down. Hold on one second. You can pause
21 the scrolling. It's page -- let's -- I'm going to take a second and find the one that I was
22 looking for. We can take this down for one second.

23 I can actually just tell you. There's another message from Tarrio that says that
24 patriots are in the Rayburn Building. Rayburn is one of the House Office Buildings, not
25 the main Capitol Building.

1 And then I want to go back and think about that 1776 document that we talked
2 about, "1776 Returns." And we can pull up the indictment again if you want to. But
3 just to remind you, there was talk about occupying certain buildings around the Capitol.
4 And then Tarrio posts this message on Parler that says there are patriots in the Rayburn
5 Building.

6 I mean, after seeing some of the MOSD chats that we looked at, and we can look
7 at a few others, and seeing Tarrio's posts on Parler about occupying the Rayburn Building,
8 and then his encouraging people to stay at the Capitol on that day, again, I just kind of
9 want your reaction and maybe if you can give me insight into what you think Tarrio was
10 doing or thinking.

11 But it certainly seems like from the MOSD chats that he was organizing a group of
12 Proud Boys to march on the Capitol that day and you were left out of those plans. What
13 are your thoughts on that?

14 A I'm glad I was left out of those plans or there would -- I'd be probably sitting
15 next to you today, rather than being talked -- being allowed to talk to you on the internet.
16 But I also think a lot of those parlays or -- is it okay if I just refer to them as tweets,
17 because -- you know, like the Parler stuff?

18 Q Sure. Yeah. We'll call them Parler posts, how about that, just so the
19 record's clear.

20 A A lot of those Parler posts, you're seeing, quote, unquote, the big bad
21 boogeyman talking. You're not -- you're seeing -- you're seeing that character. You're
22 seeing that "I'm misleading you" guy.

23 Now, with the MOSD chat, I don't know. I don't know what was in those guys'
24 heads. I don't know why they would comment or talk about some of the stuff they said,
25 because they had to know that was going to get found out. A smart man would know

1 not to say that via text message, they'd say it with their own mouth or something.

2 Q So mostly you just are kind of confused by those and it seems just like a
3 stupid thing to do?

4 A It -- it was -- it's an emotional thing. It's a reckless thing. It's not a wise
5 thing. Yeah, it's not a wise thing to do that. That's what I believe about that.

6 Q Okay. I'm going to ask just a couple quick questions, sort of more
7 ideological-based questions or about what your feelings were about the election. And
8 then also my colleague, [REDACTED], who's right here but he'll appear on camera, is going to
9 have some similar questions.

10 Can you hear me? I'm seeing a spinning wheel on your screen?

11 A Yeah. I gotcha.

12 Q Okay. So the first one, the first kind of topic that I just wanted to cover
13 quickly is your feelings about the election and election integrity.

14 Did you have concerns? I know you said you attended some Stop the Steal rallies
15 and then obviously January 6th. What were your feelings about the election?

16 A He lost, fair and square, you know. And I think there was a little political
17 spin there that first night that was also reckless by media commentators and stuff like
18 that, saying, "Oh, they stole this from him."

19 Detroit every year, Philadelphia every year it takes them a couple days to do their
20 thing. Like those large cities, those are a lot of votes to calculate, tabulate. And I don't
21 know, but I think there was a lot more paper involved this year than there normally is.
22 So when people actually have to physically count things, it takes longer.

23 Q Was that feeling consistent with other Proud Boys or did you feel like other
24 Proud Boys had different feelings about the election?

25 A I don't think most of them cared. I'll bet half of them didn't vote. But

1 then there were guys, just like there always are, that are on those fringy like conspiracy
2 theories. Those guys, they're always going to exist. But I think once people realized,
3 like, hey, there ain't -- there's no meat, there's no meat here, there's nothing, there's no
4 proof, like, you know.

5 And with my attendance to the Stop the Steal rallies, I wasn't going to change the
6 outcome of the election. I was going to potentially recruit people or just have a fun
7 night drinking out with my friends afterwards.

8 Q Gotcha. Okay.

9 [REDACTED] if you want to turn on your video.

10 Hold on one second. This should be. There you go.

11 Mr. [REDACTED] Hi, Mr. Walter. Hi, Mr. Walter. I'm right next to [REDACTED] So
12 I'm looking up. That's because I'm looking at you.

13 Mr. [REDACTED] Actually [REDACTED] and I are going to switch because there are some
14 audio problems.

15 BY [REDACTED]

16 Q All right. Is this better?

17 A Yes.

18 Q Good. Well, let me know if the audio gets messed up again and we can try
19 to fix it.

20 So, as [REDACTED] mentioned, I just have a couple of questions to follow up on
21 primarily about sort of the party boy/rally boy distinction you were talking about earlier.

22 I think just for our purposes it's really helpful for us to understand where the
23 Proud Boys were coming from, where folks like Mr. Tarrio, who were more involved in
24 some of the chats that [REDACTED] was discussing, might have been coming from on
25 January 6th and beforehand.

1 So I know that will be -- might be going back and forth in some of these questions
2 to things you talked about already with [REDACTED] but I just wanted to make sure that we
3 covered all these bases, closed those loops.

4 So if you could just talk a little bit more about how the rally boys and the party
5 boys were related in your mind, because, obviously, they're part of the same organization
6 and chose to be part of the same organization. So would be curious to hear more about
7 that dynamic.

8 A Okay. I'll try to do my best to explain it.

9 I want to say around 2018 there was kind of a divide. There was one of
10 evolutions of the club, where that being celebrity security was cool. It was fun and neat
11 to do.

12 But at the same time, there were guys who thought that the attention would only
13 lead to trouble. So that's kind of where this divide started, that, hey, these guys just
14 want to be bros, hang out, do cool things in the community, and that's okay. And then
15 there was the other guys, typically your coasts, that they wanted to hang out with these
16 Ann Coulter, Ben Shapiro types and make a name for themselves.

17 So that's in a nutshell the origin of the split and it never came back together.

18 I think right now there is another evolution currently happening in the club where
19 guys just don't want to be highly visible, where a majority of members don't want to be in
20 the news. They don't want to be on Twitter. They don't want to be anywhere.
21 Because they realized we've been through this cycle before and we're going through it
22 again, so we're not learning, we're just making the same mistakes.

23 Q That's really helpful. So this divide back in 2018, 2019, was that within
24 chapters or were certain chapters more prone to one side?

25 A I think it was more so, like I've said a couple of times, the coastal chapters.

1 It seemed like they were more into the political aspect of the fraternity. And I think it
2 might have been because they were ideologically outnumbered.

3 So they had a sense of pride and brotherhood by standing beside each other and
4 helping -- what they thought was helping, helping their communities and being security
5 for folks and such like that.

6 Where, as I've previously stated, like the entire South wanted no part of the
7 security gigs or the making 50 guys who all wear the same clothes, because in our cities,
8 you know, you've got gangs and stuff. Like, when the Bloods or Crips, for lack of better
9 terms, when they see a bunch of White dudes wearing a uniform in their area of
10 operations, they don't like that.

11 Like, we've had members get shot and stuff. Not me personally, but I know of
12 members who were shot at for wearing our uniform. Not because they were doing
13 anything wrong, but because people didn't understand it was just a group of dudes trying
14 to have a night out on the town.

15 Q So I guess I'm curious to hear more on your thoughts on the more
16 mission-oriented parts of the Proud Boys, understanding that you do not consider
17 yourself part of that.

18 And one of the things that we've heard from other folks associated with the group
19 is this idea of Western chauvinism. And you mentioned Western civilization towards the
20 top of your interview with ██████ as sort of a motivating factor for some of the rally
21 boys.

22 Can you give us your definition of Western chauvinism as you understand it?

23 A Now, we have to remember who coined our group with Western
24 chauvinism. It was a shock jock in Gavin McInnes. And Gavin did his homework, that
25 you could read that word chauvinist and think that it meant sexist, or you could read the

1 secondary definition where it is extremely patriotic.

2 He did that on purpose. That's why we wear the -- we wear those black shirts,
3 because we stole them from a Jamaican skinhead club. Like, that's where the origin of
4 the yellow and black Fred Perry comes from.

5 Like, a lot of this club, how I like to explain it is we're in a fake club, with fake rules,
6 no leadership, that was always designed and built around a joke. As I previously said to
7 Mr. Quinn, I think Gavin laughs every time he sees somebody with Proud Boy tattooed on
8 him, even though he has it too. He made a bunch of grown men put "boy" on their arm.

9 Q Right. So I guess one broader question I have is there are folks who you've
10 said are much more involved in this mission of fighting against others. And it seems like
11 that idea is shot through some of the other aspects of the organization you've talked
12 about. You mentioned the shirt, a drinking club with a patriot problem, and folks who
13 have talked about security missions.

14 Why be part of an organization that has those elements in it?

15 A The answer is tricky. And I think the answer would be similar for a lot of
16 guys that you ask this question.

17 Yeah, we've gotten a couple black eyes over the years about things that have been
18 done publicly. And that stinks. It's horrible.

19 But why be part of an organization like this is because that's not what it's
20 supposed to be. It's supposed to be a -- this club was modeled off -- after the Elks
21 Lodge, which was a group of actors that could travel all over the country and meet their
22 friends, and they had somewhere to stay, they had good entertainment, and they bonded
23 with each other. That's what this club's supposed to be about.

24 And I think the true problem is we don't have any national leadership structure,
25 we don't have anything like that, so guys just do what they want. So one bad apple has

1 the ability to hurt a lot of good apples.

2 Q Yeah. And that idea of the Elk Club resonated with me related to some of
3 the other things you said earlier in your interview about traveling to events, including
4 January 6th, and some of the Stop the Steal events as well. And you seemed to say you
5 were, I think at one point you said, wanted to be there together with other Proud Boys.

6 So did you perceive those events not as occasions for political gathering?

7 A A lot of guys in the country did those large events like that. They might
8 look like one thing.

9 But to answer your question, I wasn't there for a political gathering. I was there
10 to hang out with my buds, see people I haven't seen in a while, or get to talk to people.
11 Unfortunately, on January 6th, I didn't get that opportunity because of how chaotic it
12 was.

13 Q Right. So this next question is more about your views on what you think
14 folks in the Proud Boys who are on the other end of the spectrum might understand.
15 And, again, we're kind of just trying to get the clearest picture possible of what happened
16 that day. That's why we're asking some of these questions.

17 For the rally boys bucket of folks, what do you think are the threats they see in
18 society that they need to organize against?

19 A I don't know. Like, I wish I was better prepared for that question, because I
20 think I could have some things. Like, one, I would say guys think their communities are
21 changing or that their bonds, like -- I'm just -- I'm trying to think how to put these words
22 together coherently.

23 Q Take your time.

24 A But it's just I think they just want to help. And they see things happen in
25 their communities or in their towns, or Jeff's business down the road is getting shut

1 down, and they just want to help. They don't know how to do it, but they want to do
2 something good.

3 And sometimes emotions get involved. And that's when things like January 6th
4 happen. January 6th didn't happen because it was a planned, staged, orchestrated
5 thing. You've got like 100,000 or however many people were there, people full of
6 emotion, and that got in the way of their thinking. So it messed up. That's why they
7 messed up.

8 But back to your question, it just -- I think they want do so much good for their
9 community, and then when they start doing it something emotional happens. And
10 maybe you lose -- maybe somebody loses control, maybe they get in a fight or something
11 like that.

12 So it turns all the good they did -- maybe they did a Toys for Tots thing, but then
13 they get in a fight afterwards. All the good they just did now looks bad because all that's
14 going to get reported is Proud Boys fighting people, not Proud Boys raised and donated
15 \$50,000 in toys.

16 Q Right. I appreciate that very honest answer. And I was struck by the
17 language you used about some members perceiving changes in their community,
18 businesses shutting down. Can you talk a little more about some of those changes?

19 A I don't have like a clear-cut example. Like just in, like, in my county right
20 now, people from primarily California and New York are moving into Montgomery
21 County. They're driving the price of housing up, like, so people in this community are
22 not going to be able to afford a house here. They're going to have to leave. They're
23 going to have to move.

24 And some people don't like that or, like, just all the wokism, like, that just hurts.
25 I don't understand why we just can't have a conversation instead of, like, be canceling

1 you. You know? Like, it's changes like that that get into your head and make people
2 think with their emotions rather than their brains.

3 Q antifa's come up a couple of times in your conversation with Mr. Quinn.

4 Where do you think antifa fits into that worry?

5 A I don't think too many Proud Boys worry about antifa, because they've been
6 pretty silent for about 2 years. They are not doing anything public anymore. They
7 wisened up to the game. They understood you guys were coming. So they stopped
8 being idiots.

9 But I think on an ideological standpoint, those antifa guys are real worried about
10 that, because you've got groups of young kids that range from cultural Marxism, to
11 anarchy, to socialism. Like, they have so many different cultures inside their thing, it's
12 weird. And guys think that these ten groups of kids wearing all black are going to
13 somehow magically be able to change American values.

14 Q Yeah. So I guess you were saying that, to your recollection, Proud Boys
15 weren't talking too much about antifa in the 2020 period and for the period in the 2020
16 election, early 2021?

17 A antifa was dead in 2020. They didn't exist. Like, they obviously still
18 existed, but I always had a theory that they were rebranding, because they realized that
19 their brand was bad, so that they needed to recreate themselves. Because you don't
20 hear from those guys anymore. Like, they even stopped messing with me on the
21 internet finally.

22 Q I'm just curious you say that, because there's a lot of reference to antifa in
23 both the summer of 2020 when there were some of the Black Lives Matter
24 protesters -- protests, rather. And, you know, we looked at Parler posts from Enrique
25 earlier, like he was talking about dressing in all black and kind of appearing more like

1 antifa.

2 So our understanding was that that was seen as a major threat in D.C. in
3 December and January period.

4 A I'm going to -- like, I'll readjust my timeline slightly. Maybe
5 towards -- because there were -- they were burning cities down. Like, I was in Nashville
6 when they caught the courthouse on fire. But I don't know if that was true antifa.

7 Like, I haven't seen the local antifa guy in Nashville, and I used to see him all the
8 time. I don't see him anymore. And him and I never had a physical confrontation or
9 nothing. We just kind of said, "Hey, we'll stay over here, you guys stay over there.
10 Cool. Like, we won't bother y'all, just don't bother us. Let's stop the internet, like stop
11 attacking each other on the internet."

12 But I guess back to your question, I don't think they were a threat. Now, I also
13 had the luxury of living in the South where there's not a huge antifa presence.

14 I think, like, they can't even figure out what side of socialism, communism, and
15 anarchy they want to be on in Nashville. So they all split up. So that's why I didn't
16 perceive them.

17 Now, out there in the Pacific Northwest, they probably have an antifa problem out
18 there.

19 Q I was actually going to -- go ahead. Go ahead.

20 A When you're having a huge rally in Washington, D.C., antifa is going to show
21 up to that too. They're not going to show up to Mary's Saddle Club in Clarksville,
22 Tennessee. They're not going to do that.

23 Q I was going to ask about the Proud Boys rally in August 2019 in Portland,
24 Oregon. Were you involved in that at all?

25 A I was not. If I'm thinking of the correct rally, they used one of my tricks

1 there where they made antifa think they were going to plant that flag in the middle of
2 town, and then they turned left and went and had a barbecue.

3 Q This was the End Domestic Terrorism protest? It was the largest rally of its
4 kind at the time?

5 A Yeah. And I'm pretty certain the Proud Boys were claiming they were going
6 to plant an American flag in the middle of the city they were in. If I'm not mistaken, that
7 is true. And then, instead of doing that, they straight up turned left and went to a large,
8 like, park where there was security and grills and alcoholic beverages. And they tricked
9 the whole world. And I think Mr. Tarrio touted that he made the city of Portland spend,
10 like, \$1.7 million on police force for nothing.

11 Q Yeah. Actually, after that event he made a statement to the mayor saying
12 that soon his city would, quote, "run out of money and his counterparts in government
13 will no longer take him seriously." Is that the same event you're talking about then?

14 A I believe that -- yeah, I think we're on the same page here.

15 Q So I guess at some point there was significant effort by the Proud Boys to
16 counter antifa and that was seen as an important animating principle.

17 A I would -- there was. I think it was more prevalent in, like, 2019 than in
18 2020, though, because it was that, quote, unquote, there was a culture war going on, you
19 know.

20 Q Right.

21 A The radical left and the radical right were fighting. Even though I don't
22 think I'm radical right, but I would say that's how that story would be told on FOX News or
23 CNN.

24 Q In 2020 you're saying?

25 A I think more 2019. I don't think as much in 2020. I think antifa were

1 making more mistakes in 2020 and they overplayed their hand with the taking -- what did
2 they do, they took that city in the Pacific Northwest and made that like autonomous zone
3 or whatever. Then they started burning down cities and started doing goofy stuff.

4 I don't think the Proud Boys needed to respond to that, because they were losing
5 the war by themselves. So we weren't even focused on them.

6 Q Right. So I guess you're talking a lot about the protests after the
7 death of -- the murder of George Floyd and Breonna Taylor and those protests, that
8 timeline, right?

9 A I think so, because I think that's when they burned the -- and it wasn't BLM
10 that did it, it was antifa burned a courthouse for some reason in Nashville, caught it
11 on -- the historic courthouse, they caught it on fire.

12 Q So I guess I'm curious to hear about how you personally and other Proud
13 Boys perceived the relationship between BLM and antifa in that summer period?

14 A Oh, they were fighting each other.

15 Q Okay. Interesting.

16 A They were clashing.

17 Q Could you expand on that?

18 A I just think -- I'm trying to remember. But I know there in Kentucky they
19 were shooting at each other and all sorts of stuff. And them BLM people didn't like
20 them little White kids telling them how they should feel about Black people and calling
21 them racists. They didn't enjoy that.

22 And there was a time, a very small period of time that there was an alliance or a,
23 quote, unquote, alliance between some BLM and some Proud Boys, because BLM hates
24 antifa too. And it was like, "Hey, we won't mess with y'all, don't mess with us. Let's
25 just be cool." And I can't remember, like, I know up in the Pacific Northwest they were

1 meeting together and hanging out.

2 Q The Proud Boys and BLM?

3 A Yes.

4 Q Okay. So one question, this is a little bit of a curveball. That was all really
5 interesting and helpful background.

6 We didn't get to mention this earlier, but did you ever hear any intersection of
7 QAnon theories in Proud Boy conversations?

8 A Sorry.

9 Q You're good.

10 A No. I'm sure they exist, but any time one of those people came into a chat
11 or something and they talked about trusting the plan, they'd just get bullied.

12 Q Okay.

13 A That's ridiculous. Donald J. Trump is not Q. He's not tweeting on 4 -- or
14 he's not sending messages on 4chan about the secrets of the government.

15 Q Well, I'd like to talk a little more about that faith in Donald Trump. And we
16 talked about this a little bit earlier with [REDACTED] But I believe you said that you didn't
17 think that most Proud Boys supported President Trump. Is that correct?

18 A I'd say maybe 50 percent, maybe, maybe a slight majority supported, like,
19 were fervent, like, Trump or bust guys.

20 Q Do you think that President Trump supported the Proud Boys?

21 A Absolutely not. He didn't know who we were when he said our name.
22 There's no way he did or he wouldn't have committed political suicide on national TV.

23 Q Fair enough. I guess on that note, are there any politicians that the Proud
24 Boys discuss besides President Trump who might share lesser chauvinist views or would
25 be generally sympathetic to the less fraternity aspects of the organization?

1 A I don't know a whole lot of guys that just sit around and talk about
2 politicians. In my particular chapter, if we're talking about politics, we're probably
3 talking about who's running for city council or who's going to be the mayor.

4 Because they're all -- they all just say the same thing, like -- or, I'm sorry. They
5 say opposite things, but in the end they just do the same things. The Republican Party
6 and the Democrats do the exact same things all the time. They may when they're
7 campaigning, they may say they're going to do different things, but that doesn't happen.

8 Q Understood.

9 I just had a couple more questions. I was wondering if we could pull back up
10 exhibit 8 quickly.

11 So I know we talked about this before and I know you said that -- well, I can give
12 you a second to read it.

13 A All right. I've got it.

14 Q So I know we talked about this before. And I know you said that sort of
15 online version of Enrique Tarrio is much different than the Tarrio that you know person to
16 person.

17 But I just wanted to talk through a couple of the statements made in this message
18 and just kind of see your reaction, what you think he might mean by that, to better
19 understand how you viewed these dynamics.

20 And I guess the first thing that stuck out to me is his sort of -- right after he quotes
21 the links to the Proud Boys tag in the middle of the first paragraph, he makes reference to
22 the "globalists dirty work."

23 What did you think he meant by that?

24 A "Proud Boys you can see real time the media machine do the globalists dirty
25 work."

1 I really don't know. I think what he's trying to say is with the organization, all
2 you could see is that they only reported negatively on us. Like, if we did something and
3 messed up, it was on all the news channels. Whereas if the other side messed up, it was
4 on none of the news channels. So it was the media, the media was turning us all into
5 the boogymen.

6 Q Right.

7 A I think that's the idea behind that, but I don't know.

8 Q But the use of the term "globalists" and the use of the term "enemy of the
9 people" in the next sentence didn't -- doesn't strike any alarm bells for you in terms of
10 sort of their use there?

11 A Because I'm still trying to remember the globalist, you know, what actually
12 that entails. And then, "The media is the enemy of the people."

13 I don't think the media is the -- I personally don't think the media is the enemy of
14 the people. But I do think the media has the ability to destroy people and they do it
15 without regard.

16 Q Yeah. And I guess -- thank you for that.

17 The other point that I thought was interesting was his language that seems quite
18 tactical in nature. And, again, this is a public post. But he writes "1,000 boots on the
19 ground" in the last -- in the second to last line in the first paragraph. He discusses in the
20 third paragraph, spreading across downtown D.C. in smaller teams.

21 Doesn't that read to you as pretty military-focused language?

22 A I mean, yes.

23 Q All right. So I guess I'm wondering was this language present in some other
24 chats that you or posts that you saw before January 6th.

25 A Not that I recall.

1 Q Not really? Yeah. I guess I'm just curious about whether some of the
2 social aspects of how you described the 6th and other events were sort of outweighed by
3 language like this. But I guess what you're saying is that it really wasn't and you didn't
4 take all this particularly seriously?

5 A To be honest with you, I don't read everything he posts. Like, a lot of the
6 stuff, I'm probably seeing it for the first time right now.

7 Q Okay. That's fair enough.

8 A Just like with this statement, for example, "With the new ability I've
9 been" -- let me try again. "With the new ability I've being able to put 1,000 boots on the
10 ground we outgrew any single hotel."

11 So he's saying he's going to bring 1,000 people to Washington, D.C., but then he
12 directly contradicts himself in, "We will be incognito and we will spread out across
13 downtown D.C. in smaller teams." How can 1,000 people operate in small teams?

14 Q That's a fair point. That's fair.

15 A I mean, I'm not trying to pick apart like the grammar or anything he's saying
16 here. But it's a very -- to me it's a contradictory statement, because 1,000 people, that's
17 like a full brigade combat team. Never in a brigade do you have any elements smaller
18 than five moving. So now if you do the math on that, that's 200 small groups of five?
19 That probably would not be incognito or inconspicuous.

20 Q Well, thank you for all that. I think that we might take -- go off the record
21 for a few minutes, if that's all right with you. And we're almost done. So I think we'll
22 just have one last round of questions and then we can go off the record until 6 o'clock?

23 A What time is it there?

24 Q Oh, sorry. It's almost 6 o'clock our time, 5:54.

25 A So it would be 5 o'clock my time. I got it.

1 Q 5 o'clock your time. Yeah. All right. Great. Thank you.

2 A Yes, sir.

3 [Recess.]

4 Mr. [REDACTED] All right. Let's go back on the record then at 6:01.

5 BY [REDACTED]

6 Q And so, I know that you said -- you had said earlier when you were talking to
7 [REDACTED] that there was no plan for January 6th, it was a lot of people that came together
8 and kind of had some strong emotions and then got taken over by those emotions on the
9 day. Is that -- that's kind of accurate, that's how you feel about what happened on the
10 6th?

11 A In my opinion, if I was an analyst, that's the assertion I would make, yes.

12 Q Okay. And then I guess do -- I want to take 1 or 2 more minutes to go over
13 some of the things in the indictment and understand what you think, given the facts that
14 we know now about the things Tarrio was saying at the time and other leaders, like Rehl
15 and Donohue and Nordean, the people that we've talked about, given the things that
16 they were saying, what your understanding of that is. And then also -- well, let's just do
17 that quickly.

18 So if we can pull up exhibit 16 and go to paragraph 49. So I'll give you a second
19 to read that.

20 And then, for the record, again, exhibit 16 is the indictment of Enrique Tarrio.
21 And this paragraph 49 says that, "On January 3rd, as efforts to plan for January 6th
22 intensified in the MOSD leadership chat, Tarrio stated in the MOSD Leaders Group that he
23 wanted to wait until January 4th to make final plans."

24 "In response, at 7:10, PERSON-3 posted a voice note to the MOSD Leaders Group
25 in which he stated," and this is a quote, "'I mean the main operating theater should be in

1 front of the House of Representatives. It should be out in front of the Capitol Building.
2 That's where the vote is taking place and all the objections. So we can ignore the rest of
3 these stages and all that shit and plan the operations based around the front entrance to
4 the Capitol Building. I strongly recommend that you use the National Mall and not
5 Pennsylvania Avenue, though. It's wide-open space, you can see everything coming
6 from all angles."

7 Rehl responds to the chat, "good start."

8 And then, shortly after that, about 26 minutes later, paragraph 50, "January 4th,
9 2021, Tarrio posted a voice note to the MOSD Leaders Group at 7:36 in which he stated, 'I
10 didn't hear this voice until now, you want to storm the Capitol.'"

11 I'm going to run through a couple more parts of the indictment quickly. If we can
12 go down to 99.

13 So this is after Proud Boys have entered the Capitol. 2:38 p.m., Tarrio makes a
14 public post on social media that reads, "Don't fucking leave."

15 And then at 2:39 Tarrio responds to a question posed by a Proud Boy member.
16 And the question is, "Are we a militia yet?" And Tarrio responds, "Yep." And then he
17 says, "Make no mistake...We did this..."

18 So he's watching the events unfold. And there was obviously mention of a plan
19 to storm the Capitol before that in fact happens. And then Tarrio says, "Make no
20 mistake...We did this..."

21 I guess, and correct me if I'm wrong, but it sounds like he means Proud Boys or
22 people that the Proud Boys are associated with.

23 I guess, does this change your perspective a little bit about what was or wasn't
24 planned or what other Proud Boys were doing outside of kind of your knowledge?

25 A Can you repeat the last part of the question?

1 Q Yeah. Just does this change -- seeing those things, and those posts, and
2 understanding the timeline, does that change your perspective about what was being
3 planned outside of your knowledge?

4 A I would have to assume the answer to that is yes. But especially because
5 you have this from a private chat, I think you need to throw the -- anything public -- I
6 wouldn't believe a word of anything he said in public. The private stuff, the one that
7 was above these, it said something along the lines: I didn't hear this until just now, so
8 you want to storm the Capitol.

9 Q Right.

10 A I'd like to see the response to that, but I don't think it's -- I don't think it's in
11 this document. But I'd like to -- I'd like to see the rest of that conversation. Because
12 on its head that one line is very damning, like, "Oh, so you want to storm the Capitol?"
13 Like by itself that sucks. But I don't know what was said before or after.

14 And as we've discussed multiple times, I wasn't in the planning phase. So I, you
15 know, I don't -- you know, I don't know any of this.

16 Q Yeah. No. Yeah, I understand that. I guess what I'm trying to get at and
17 what I want to understand from you is, you know, the folks that are in this chat and that
18 were leaders, the name of one of the chats was MOSD Leadership Group, so they were
19 leading this larger group of people that were in the Ministry of Self Defense, like Nordean
20 and Rehl and Biggs and Tarrio. I mean, correct me if I'm wrong, but even if there is not a
21 national chapter, those are leaders of the Proud Boys, right? Influential --

22 A I'm sorry, I had a text I had to read. It was from my daughter. I apologize.

23 Q No. That's okay. That's always a good reason to check or to be
24 distracted.

25 But -- so what I was trying to say was, what I really want to understand and what

1 I'm trying to get at is the folks that were in this chat, and the chat is named a leadership
2 chat, MOSD Leadership Group, like Tarrio and Nordean and Biggs, these are -- I
3 understand there is not a national chapter, but these are leaders of the Proud Boys or
4 influential members of the Proud Boys, right?

5 A I like the influential part than the leader part. But, yeah, they are --

6 Q Okay.

7 A -- to have influence.

8 Q Right. And so I guess at what point, I know you have a different idea about
9 what the Proud Boys are or what they should be, but is there a point at which so many
10 members of or influential members of the Proud Boys say one thing that that becomes
11 what the group is?

12 A I think -- you saw the other conversations that other influential members are
13 saying the opposite, you know, so there's a little tit for tat. But I do agree to your point
14 that if all 50 States' presidents said this one thing all day long, it would now be spoken
15 into truth.

16 Q Yeah. Okay. Then I guess with that understanding, if you could just tell
17 me what do you think -- you know, we've talked before and you expressed kind of some
18 angst and sadness about some of the Proud Boys that are in jail right now.

19 And so I kind of wanted to understand, of the people, like the ones we've just
20 talked about, that were involved in planning, marching towards the Capitol, and planning
21 potentially to enter the Capitol or other buildings around the Capitol, what are your
22 feelings about what they did? Was it illegal? Was it -- or just tell me what your
23 feelings are about those people.

24 A I appreciate the question, because it allows me to answer this. I answered
25 this for a local news channel that really cut it up, and this gives me the full forum to

1 answer this correctly.

2 I think that everybody that went in the Capitol, I thought that -- I thought it was
3 neat to see that number of people in one place at one time. I still stand by my
4 statement that if you broke in, broke anything, stole anything, or damaged anything, you
5 absolutely committed a crime and you have to pay for your -- you have to be held
6 accountable for your actions.

7 But I think also at the same time, like I said previously, I think you had a lot of
8 people there playing follow the leader and running on emotions.

9 So in my opinion, or in my thought process, like, those people that were stealing
10 stuff, they need to be punished to the full letter of the law. People that walked through
11 that building, I mean, come on. Like, I didn't do it because, like, I looked at the entrance
12 to the Capitol and went: That's a crime to do that. That is definitely illegal to go in
13 there, whether it's a misdemeanor or a felony or what. I thought it was a felony to
14 walk -- to trespass on government property.

15 And I don't know what these guys did when they were in there. I don't know
16 what Nordean did. I don't know what Biggs did. I don't know what Rehl did. I don't
17 know what Yut did. I don't know what they did while they were in there. And so, I
18 can't really speak to if I think what should happen to them.

19 I know what Nick Ochs and I know what DeCarlo did when they were. They
20 smoked a cigarette in there and they got charged with felonies for smoking a cigarette. I
21 know what a couple other people did in there that wasn't malicious.

22 But I also saw the videos of that QAnon Shaman running around with a podium or
23 something or that one guy with his legs kicked up on Pelosi's desk. That's not
24 appropriate. Their offices do not belong to the people. That's like a private space.
25 That building -- sure, should they not have done it while the Congress was in session?

1 That probably made this whole thing a lot worse.

2 But to finish it, I think people were operating on high emotions and they
3 made decisions with their feelings and not with their heads. And I hope it never
4 happens again in the United States Capitol, I mean.

5 But I don't know what I would suggest the punishment be, because that's not my
6 role, you know, that's not my role. I don't know how severe every individual person that
7 went in there, their actions were.

8 So some shouldn't be punished, some should be punished. And then there's a
9 big group of people in between that are questionable. I don't know.

10 Q Okay. Yeah, that's helpful. I appreciate that answer.

11 The only other thing I wanted to talk about generally is what your view of
12 President Trump's role in this event was, and then a little bit about kind of what you think
13 of his reaction afterwards and up until now.

14 So first of all, I'll just ask, did you hear any of President Trump's speech on the
15 6th?

16 A I heard bits and pieces of it, because there were, like, speakers set up
17 everywhere, so you could kind of hear. But I didn't get to hear a lot of it. Like, I guess I
18 was arriving as he was speaking. And there's that something where he said, "Let's
19 march to the Capitol peacefully," or something along those lines. I didn't -- I was not
20 present to hear that. I didn't hear that part.

21 Q Okay. I know you also said that you think he lost the election fair and
22 square. Obviously, some people there on the 6th didn't think that. They thought that
23 the election was stolen. And I think you also said that you heard that President Trump
24 told people to march towards the Capitol. And you were also under the impression that
25 he might show up at the Capitol and speak there.

1 So, I guess, what is -- do you think that President Trump's words or actions on that
2 day led people to go to the Capitol and kind of put them in the position that -- or was one
3 of the factors that led to what happened at the Capitol?

4 A I believe he riled some people up. He may have started that emotional
5 response. He got people up in their feelings. But what politician doesn't do that?

6 And I think Maxine Waters has said some questionable things. I think they all say
7 questionable things because, especially in this weird divisive time, they need clicks on the
8 Twitter machine. They need to be cool with the kids and this and that.

9 So I guess the long answer of what you're asking is, I think he got people in their
10 feelings, but I think at the time he didn't understand that was going to happen. Like he
11 wasn't thinking, "Oh, I'm going to say some shit and these people are going to bust some
12 doors down and light that place on fire." Like, I don't think he thought that.

13 Q What do you think of about once it was clear that people had breached the
14 Capitol, obviously, there was a number of hours in between the time the Capitol breach
15 started and that President Trump went -- sent out that video asking people to leave the
16 Capitol, do you think he took too long to do that?

17 A I don't know, because I don't know what the SOP is there. I'm imagining
18 the Secret Service was taking him down the tunnel and getting him in the safe room.

19 I'm surprised they didn't put him up in the air to get him out of there, because Air
20 Force One can fly for 24 consecutive hours without taking a break. And that's normally,
21 when something bad happens, that's where they put the President, up in the sky, because
22 he's got the Air Force up there too.

23 So I don't know what the protocols were there. I would have liked to see it come
24 a little faster. He could have at least -- whoever run -- ran his Twitter at the time could
25 have at least shot a tweet or something.

1 But I don't -- like, I think my final answer is I can't determine how long it should
2 have took him to send a message because I don't know what the protocols are for, "Oh,
3 shit, they're storming the Capitol. They might go to the White House next."

1

2 [6:18 p.m.]

3

BY [REDACTED]

4

Q Fair enough, yeah.

5

Okay. And then how about just after the 6th, understanding everything that unfolded, and, you know, that people have, in fact, been charged, some of them your friends, how do you feel about Trump's reaction to that up until today?

8

A I wish maybe -- maybe -- maybe he would've said some more clear things, but I understand he's been deleted too. It's hard for him to get his messages out. But I wish maybe he would've started to help the healing. But now it seems like we're getting ready to ramp up again and we're going to be in -- well, I think, we're going to be in a similar situation in the next election. There's going to be a lot of hatred towards each other in this country again if that man runs for President again. But he's got to do it, because he's got to protect his brand, because he was only a one-time President, not a two-time -- not a two-term. So he -- he can't go out losing.

16

And I wish the election [inaudible] I wish that would stop, because that's just going to get more dangerous too.

18

Q Okay. Last -- I'll have a couple of technical questions for you at the end, but last kind of substantive question is, and we ask a lot of people this, but is there -- what would you -- you noted that the election's coming up and that President Trump might run again, and we've spent a lot of today obviously talking about what caused January 6th, but what do you think -- do you have any ideas about what the fix for that is or what should change to prevent January 6th from happening in the future?

24

A Barack Obama, I hate to say it like that, but a man of the people, a man who isn't divisive, a man that's a bringer-together, like, a slick-talking dude that brings -- that

1 brings the country back together is the only way to ever prevent that again.

2 Because let's say Trump wins. Well, then the left's going to be doing that at the
3 Capitol. Or let's say Biden runs again. I don't -- I don't think it'll happen again because
4 I don't think there's a polarizing -- there's not a figure polarizing enough who -- to create
5 the incident again.

6 I think maybe -- maybe the National Guard should've been there the day before
7 instead of hours afterwards. Maybe the local cops, the police presence could've been
8 beefed up, because it -- it sounded like they didn't have enough anti-riot stuff present at
9 the -- at what they understood was going to be a riot.

10 I'm -- I'm going to go on a limb and say those Capitol Police officers ran out
11 of -- ran out of flash bangs and ran out of CS. And I -- I don't know, because to go into
12 the strongest country in the world's political house, it -- it's just -- that shouldn't be
13 allowed to happen. That should -- you know, someone should've stopped that.

14 Q Yeah. Okay. Then last couple of quick questions. Have you -- have you
15 talked to the FBI at all or DOJ in relation to January 6th?

16 A I -- they have contacted me, and I've spoken with one or two of them.

17 Q Okay.

18 A And it was -- it was -- they saw the pictures. They wanted to know what
19 was real, what wasn't, was I actually in the building, kind of questions.

20 Q Okay. And when was that?

21 A I don't know the exact date. It was --

22 Q Like early 2021?

23 A Yeah. It was -- it was maybe a month -- I don't know, maybe a month or
24 less than a month afterwards. Because they said very specifically that it wasn't very
25 hard to find my phone number or my address because it's all over the internet, you know.

1 Q Yeah. And just a ballpark on the date is fine.

2 Did you -- did you give them anything, like, produce any documents or give them
3 your phone or anything like that?

4 A No.

5 Mr [REDACTED] Okay. All right. Then unless anybody else has anything, anybody
6 else that's on the line, I think we're done for today.

7 Before we go off the record, I'll just say one more time, thank you very much for
8 talking with us. It's been a really enlightening conversation, and we appreciate you
9 being really forthcoming and answering all of our questions and helping us understand
10 your experience of that day.

11 Unless you have anything else, we can -- are you good or have anything else you
12 want to say?

13 The Witness. Well, the only question I have, could you refresh me on, like, what
14 did you say in the beginning of this, when we first started, about the transcripts of
15 the -- of this conversation?

16 Mr. [REDACTED] Yeah. So we will not, during the course of the investigation, be
17 disclosing what we talked about, staff or members of the committee. There will be
18 decisions at the end of the investigation about what transcripts are released and what
19 makes it into a report.

20 You'll also get a chance to review this transcript, if you want to review it. But,
21 essentially, it was just, we're not going to talk about this transcript. And you are free to
22 if you want to. You're not bound by any confidentiality or secrecy here, but we won't be
23 talking about it.

24 The Witness. Perfect. I'd like nobody to talk about it, so --

25 Mr [REDACTED] And then, like I said, once we have the transcript, you'll have an

1 opportunity to review that if you want to.

2 The Witness. Okay.

3 Mr. [REDACTED] Then, with that, I think we can go into recess, and then we're done.

4 [Whereupon, at 6:25 p.m., the deposition was recessed, subject to the call of the

5 Chair.]

1 Certificate of Deponent/Interviewee

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

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10 Witness Name

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14 Date

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