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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: GARRETT ZIEGLER

15 Tuesday, July 19, 2022

17 Washington, D.C.

20 The deposition in the above matter was held in Room 5480, O'Neill House Office  
21 Building, commencing at 10:17 a.m.

22 Present: Representative Schiff.

1        Appearances:

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4        For the SELECT COMMITTEE TO INVESTIGATE

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

6        [REDACTED] PROFESSIONAL STAFF MEMBER

7        [REDACTED] SENIOR INVESTIGATIVE COUNSEL

8        [REDACTED], CHIEF CLERK

9        [REDACTED], INVESTIGATIVE COUNSEL

10      [REDACTED], PROFESSIONAL STAFF MEMBER

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13      For GARRETT ZIEGLER:

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15      JOHN KIYONAGA

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1 [REDACTED] Let's go on the record.

2 This is the deposition of Garrett Ziegler conducted by the House Select Committee  
3 to Investigate the January 6th Attack on the United States Capitol pursuant to House  
4 Resolution 503.

5 This will be a staff-led deposition, though members may choose to ask questions  
6 as they so desire.

7 My name is [REDACTED] I am a senior investigative counsel with the select  
8 committee. Present in the room with me is [REDACTED], professional staff member.  
9 Members may join the deposition either in person or by Webex, and I'll do my best to  
10 note their presence as they join.

11 We'll be holding this deposition under House rules that we've previously provided  
12 to Mr. Ziegler and his counsel.

13 Under those rules, Mr. Ziegler, you're permitted to have your attorney present.  
14 I'll note for the record that your attorney is present and I'll have him identify himself in a  
15 moment.

16 Counsel for other persons or other government agencies may not attend. In  
17 other words, the only lawyers who are present today are those from the select  
18 committee and your counsel.

19 At this time, I'd ask Mr. Ziegler's counsel to please state his name for the record.

20 Mr. Kiyonaga. My name is John Kiyonaga, K-i-y-o-n-a-g-a. I'm counsel for  
21 Garrett Ziegler, Z-i-e-g-l-e-r, the deponent in this matter.

22 [REDACTED] Thank you, John.

23 Before we get started, I'd like to cover a few grounds rules for today's deposition.

24 As you heard me mention before -- well, maybe you didn't hear me mention  
25 because I didn't say it -- we have an official reporter who's transcribing the deposition.

1       The deposition's also being video recorded, but the reporter's transcription is the official  
2       record of the proceeding. So it's important that you wait to answer each question until  
3       it's completed before you give your answer, and I'll do my best to wait until you complete  
4       your answer before I ask the next question.

5                 The reporter cannot note nonverbal responses, such as shaking or nodding of the  
6       head, so it's important that you respond to each question with an audible verbal  
7       response.

8                 If you need to take any breaks or would like to discuss anything with your attorney  
9       privately, we're happy to accommodate you and take breaks as best we can.

10                You may only refuse to answer a question to preserve a privilege recognized by  
11       the select committee. If you refuse to answer a question based on privilege, staff may  
12       either proceed with the deposition or seek a ruling from the chair on the objection at that  
13       time. If the chairman overrules such an objection, either after the objection is made or  
14       at the end of the deposition, you will be required to answer the question.

15                I want to remind you that it's unlawful to deliberately provide false information to  
16       Congress. And because you will be taking an oath to tell the truth in this deposition, a  
17       knowingly false answer could subject you to prosecution for perjury.

18                Do you have any questions on anything I said thus far?

19                The Witness. No.

20                [REDACTED] Madam Reporter, I'd ask you to swear the witness, please.

21                The Reporter. Yes, sir.

22                Please raise your right hand.

23                Do you solemnly swear and affirm, under the penalty of perjury, that the  
24       testimony you will give will be the truth, the whole truth, and nothing but the truth?

25                The Witness. I do.

1           The Reporter. Thank you.

2                                  John, is there something you wanted to say on the record before we  
3 start?

4           Mr. Kiyonaga. Yes. Mr. Ziegler has complied fully with the subpoena for  
5 documentation. That should not be taken as any concession on his part of the authority  
6 of the committee to seek such. He is going to be, beyond acknowledging his identity  
7 and the fact that he is the person subject to the subpoena and has provided documents  
8 and plenary compliance therewith, he is going to be refusing to answer any further  
9 questions based on his Fifth Amendment privilege against self-incrimination,  
10 acknowledging the fact that incrimination does not connote any consciousness of guilt.

11                 Rather, it is any disclosure or statement that could tend to excite or encourage a  
12 surmise of guilt on the part of a third party, specifically any law enforcement entity, which  
13 definition I would take for purposes of this hearing to include the committee, and which  
14 concern is manifestly well-founded given the fact that his previous boss has been arrested  
15 in a very public manner.

16                 But also comprised within his invocation of privilege will be an executive privilege,  
17 deliberative privilege, Presidential communication privilege, privilege founded on  
18 freedom of association and First Amendment and privacy as the case may be.

19                 But I've instructed him in response to specific questions beyond the initial  
20 questions acknowledging who he is and why he's here simply to invoke his privilege.  
21 And I'm explaining ahead of time what that means to avoid a word salad every time a  
22 question is asked.

23                 If there develops a disagreement between myself or himself and the committee as  
24 to whether or not he is entitled to invoke privilege, he is going to require a ruling from an  
25 Article III judge, a United States district judge, compelling responses. He will not be

1 bound by a determination by the committee.

2 So ask away.

3 [REDACTED] Okay. So I'm not going to respond to sort of all that.

4 I do want to point out that we are not a -- this committee is not a law  
5 enforcement agency. So I want to state that for the record and don't want my silence  
6 on that issue to connote any sort of type of agreement with your -- with the assumption  
7 that you've made in connection with that statement.

8 Mr. Kiyonaga. Yeah, I understand, and I note your disagreement. We'll have to  
9 disagree on that. But my position, his position, is that the committee is acting as one.  
10 So the fact that it's part of the legislative branch doesn't change the practical effect, in  
11 our view, of its operations.

12 [REDACTED] Okay. And in terms of invoking privileges -- well, I take it that Mr.  
13 Ziegler is going to, on your advice, is going to invoke the Fifth Amendment to any  
14 substantive question that I ask.

15 Mr. Kiyonaga. Yes.

16 [REDACTED]. And I'd be fine -- I think it would be helpful to articulate that clearly.  
17 If there are other objections that you also have that you'd like to reserve, I think that's  
18 also fine as well and not have to sort of state those every time.

19 But I do want it to be clear, if there's a particular question to which Mr. Ziegler is  
20 asserting his Fifth Amendment rights, then that should be stated for the record.

21 Mr. Kiyonaga. Well, what I'd like to do is assert his rights in the plural,  
22 understanding ahead of time that those comprise principally his Fifth Amendment right,  
23 but also on an individual basis the other rights that I've mentioned. I'm not sure I want  
24 to be bound by an analysis that I make on the fly in here today as to exactly which other  
25 privileges might apply.

1           But I would state at the outset that the Fifth Amendment privilege should be  
2       taken, as far as we're concerned, to apply to any question you ask beyond the initial  
3       questions confirming who he is.

4 So in other words, the other privileges that I mentioned a moment ago may or  
5 may not apply to particular questions that you ask, but the Fifth Amendment privilege will  
6 always apply. So that that will -- that should cover basically any substantive question  
7 that you're going to be asking beyond the initial confirmation of who he is.

8 Okay. Anything else we need to cover before we get started?

9 Mr. Kiyonaga. I don't think so.

10 EXAMINATION

11 BY

12 Q All right. Mr. Ziegler, if you can take a look at exhibit 1 in your binder.  
13 Exhibit 1 is the subpoena from this committee dated April 27th, 2022.

14 Do you understand that you're appearing here today pursuant to that subpoena?

15 A Yes.

16 Q The subpoena also calls for production of documents and information,  
17 including electronically stored information.

18 Have you conducted a diligent search for records that are responsive to the  
19 subpoena?

20 A Yes.

21 Q Have you produced to the committee all documents and communications in  
22 your possession, custody, or control that are responsive to the requests described in the  
23 subpoena?

24 A Yes.

25 Mr. Kiyonaga. Speak up when you say yes. Don't mutter it into your chest.

1           The Witness. Okay.

2           BY [REDACTED]

3           Q    Could you describe, generally, what efforts you took to comply with this  
4 subpoena, exhibit 1?

5           A    I conducted a search based on all of the electronic devices that I have access  
6 to and own and went through them diligently, including the electronic accounts, to mean  
7 email accounts, most of which I do not have access to anymore, particularly my former  
8 White House account where the lion's share of this correspondence would reside.

9           And I understand that, based on my cursory knowledge of the Presidential  
10 Records Act, that account and all the materials therein are in the National Archives.

11          Q    When you say the account information, do you mean that you went online,  
12 for example, to Gmail or some other ISP, and tried to access your records that way as  
13 well?

14          A    Yes.

15          Q    Did you look for hard --

16          Mr. Kiyonaga. Could you indulge me one minute.

17          [Discussion off the record.]

18          Mr. Kiyonaga. Thank you.

19          BY [REDACTED]

20          Q    Did you look for hard copy documents, including any notebooks or notes of  
21 meetings?

22          A    Yes.

23          Q    In your search for electronically stored information, did you also look for  
24 documents in addition to electronic communications? So, for example, Word  
25 documents or Excel spreadsheets or things of that nature?

1           A    All the above, yes.

2           Q    And in terms of emails that you searched, did you -- I think you mentioned  
3        your work email and maybe difficulty -- your prior work email -- difficulty getting access  
4        to that.

5           Did you look for documents, responsive documents connected to all of the email  
6        addresses that you had in the relevant time period?

7           A    Yes.

8           Q    Including your iCloud account?

9           A    Yes.

10          Q    With respect to messages, did you search for text messages?

11          A    Yes.

12          Q    On which phones?

13          A    My personal. And then, obviously, I don't have the work phone anymore.

14          Q    Did you just have one phone during the relevant timeframe?

15          A    Yes.

16          Q    Did you look for responsive messages under various messaging applications,  
17        for example, Signal or Telegram or WhatsApp?

18          A    Yes.

19          Q    How about social media private messages? During the relevant timeframe,  
20        did you use those platforms to communicate with other individuals?

21          A    Yes.

22          Q    And did you search those platforms to see if you had responsive documents?

23          A    Yes.

24          Q    Have you destroyed, deleted, or otherwise manipulated any documents  
25        responsive to the requests described in the subpoena?

1           A     No.

2           Q     Have you withheld from production any responsive documents based on a  
3     claim of privilege?

4           A     No.

5           Q     So there's no document that you found that appeared responsive, but you  
6     felt that because of any other privileges that your counsel has referenced or otherwise  
7     that you feel you needed to or could produce the document?

8           A     To my recollection, no.

9           Q     Okay. Could you briefly describe your educational background, starting  
10    after high school?

11          A     I attended Saint Louis University in St. Louis, Missouri. I graduated with a  
12    degree in economics. And that is it.

13          Q     When did you graduate?

14          A     May 2018.

15          Q     What jobs have you held since graduating from college?

16          A     Just at the White House from February of 2019 to January of 2021, and then  
17    now I run a 501(c)(3) nonprofit.

18          Q     So your job at the White House was your first job upon graduation from  
19    college?

20          A     Yes, sir.

21          Q     What was your title in the White House beginning in February 2019?

22          A     Policy analyst.

23          Q     Within a particular office within the White House?

24          A     Yes, the Office of Trade and Manufacturing Policy.

25          Q     How did you get that position?

1           Mr. Kiyonaga. I'm going to ask you to invoke.

2           The Witness. I'm invoking my right under the Fifth Amendment to not answer  
3       particular questions.

4           BY [REDACTED]

5           Q     And so you're -- sorry. Something else you wanted to say in response to  
6       that question?

7           A     No.

8           Q     So you're invoking your Fifth Amendment right not to answer that question?

9           A     Yes.

10          Q     How long did you work in the Office of Trade and Manufacturing Policy?

11          A     Twenty-three months.

12          Q     What were your job responsibilities?

13          A     I invoke my right to silence.

14          Q     Under the Fifth Amendment?

15          A     Yes.

16          Q     To whom did you report during the 23 months that you worked at the Office  
17       of Trade and Manufacturing Policy?

18          A     I invoke my right to silence.

19          Q     Under the Fifth Amendment?

20          A     Yes.

21          Q     In late 2020, approximately how many people worked in the Office of Trade  
22       and Manufacturing Policy?

23          A     I invoke my right to silence.

24          Q     Under the Fifth Amendment?

25          A     Yes.

1           Q     While you were working in the White House, did you do any work for the  
2     Trump 2020 campaign?

3           A     I invoke my right to silence.

4           Q     Under the Fifth Amendment?

5           A     Yes.

6           Q     Was that the direction of Peter Navarro?

7           A     I invoke my right to silence under the Fifth Amendment.

8           Q     Mr. Navarro had said publicly that he allowed several members of his staff to  
9     help out in battleground States on their own time. Did that include you?

10          A     I invoke my right to silence under the Fifth Amendment.

11          Q     What campaign activities, if any, were you involved with in 2020?

12          A     I invoke my right to silence under the Fifth Amendment.

13          Q     Are you going to assert your Fifth Amendment privilege against  
14     self-incrimination to any questions I would ask you about your work on the 2020  
15     campaign?

16          A     Yes.

17          Q     After the 2020 election, did you assist with any efforts by the Trump  
18     campaign to challenge the results of the election?

19          A     I invoke my right to silence under the Fifth Amendment.

20          Q     Did Mr. Navarro direct you to assist the Trump campaign in its efforts to  
21     challenge the 2020 election?

22          A     I invoke my right to silence under the Fifth Amendment.

23          Q     What discussions did you have with Mr. Navarro regarding the 2020  
24     election?

25          A     I invoke my right to silence under the Fifth Amendment.

1           Q     Did you ever discuss with him strategies for overturning the election?

2           A     I invoke my right to silence under the Fifth Amendment.

3           Q     Did other members of the staff of the Office of Trade and Manufacturing  
4     Policy participate in efforts to challenge or overturn the 2020 election?

5           A     I invoke my right to silence under the Fifth Amendment.

6           Q     Which staff members from the Office of Trade and Manufacturing Policy  
7     assisted in efforts to challenge the 2020 election?

8           A     I invoke my right to silence under the Fifth Amendment.

9           Q     Did Joanna Miller participate in those efforts?

10          A     I invoke my right to silence under the Fifth Amendment.

11          Q     Did Hannah Robertson assist in those efforts?

12          A     I invoke my right to silence under the Fifth Amendment.

13          Q     Alexander Szarka, did he participate in those efforts?

14          A     I invoke my right to silence under the Fifth Amendment.

15          Q     Did Brendan McCommas participate in those efforts?

16          A     I invoke my right to silence under the Fifth Amendment.

17          Q     Do you know someone named Christopher Abbott?

18          A     I invoke my right to silence under the Fifth Amendment.

19          Q     Were there any analysts within the Office of Trade and Manufacturing Policy  
20     who were not tasked with work relating to overturning the 2020 election during the time  
21     you were there?

22          A     I invoke my right to silence under the Fifth Amendment.

23          Q     Between mid-November 2020 and early January 2021, approximately how  
24     many hours per day did you spend working on issues related to contesting the 2020  
25     election?

1           A    I invoke my right to silence under the Fifth Amendment.

2           Q    Are you able to estimate what percentage of Mr. Navarro's time he spent  
3       working on election-related matters in November and December of 2020?

4           A    I invoke my right to silence under the Fifth Amendment.

5           Q    Mr. Ziegler, are you going to assert your Fifth Amendment privilege against  
6       self-incrimination to any questions I would ask of you regarding your efforts to assist in  
7       challenging or overturning the results of the 2020 election?

8           A    Yes.

9           Q    And would you likewise assert your Fifth Amendment privilege against  
10      self-incrimination to any questions I would ask you about Mr. Navarro's efforts in that  
11      regard?

12          A    Yes.

13          Q    Did you work with someone -- Strike that.

14          Do you know someone named Christos Makridis?

15          A    I invoke my right under the Fifth Amendment to silence.

16          Q    Did Mr. Makridis assist in the efforts to challenge or overturn the 2020  
17      election?

18          A    I invoke my right to silence under the Fifth Amendment.

19          Q    Do you know someone named Riley?

20          A    I invoke my right to silence under the Fifth Amendment.

21          Q    In November 2020, did you have any contact with attorneys for the Trump  
22      campaign?

23          A    I invoke my right to silence under the Fifth Amendment.

24          Q    Have you ever spoken to Rudy Giuliani?

25          A    I invoke my right to silence under the Fifth Amendment.

- 1 Q Have you ever spoken to Sidney Powell?
- 2 A I invoke my right to silence under the Fifth Amendment.
- 3 Q Have you ever spoken with Emily Newman?
- 4 A I invoke my right to silence under the Fifth Amendment.
- 5 Q Did you speak with any attorneys who were representing or assisting the
- 6 Trump campaign regarding strategies for overturning the results of the 2020 election?
- 7 A I invoke my right to silence under the Fifth Amendment.
- 8 Q In November of 2020, did you attend any meetings at the Westin Hotel in
- 9 Arlington?
- 10 A I invoke my right to silence under the Fifth Amendment.
- 11 Q Have you ever been to the Westin Hotel in Arlington?
- 12 A I invoke my right to silence under the Fifth Amendment.
- 13 Q Did you ever meet Ms. Powell there?
- 14 A I invoke my right to silence under the Fifth Amendment.
- 15 Q Did you ever meet Mr. Giuliani there?
- 16 A I invoke my right to silence under the Fifth Amendment.
- 17 Q Did you ever meet Mike Trimarco there?
- 18 A I invoke my right to silence under the Fifth Amendment.
- 19 Q Did you ever meet or speak to Phill Kline at the Westin at Arlington?
- 20 A I invoke my right to silence under the Fifth Amendment.
- 21 Q Is it your intention to assert your Fifth Amendment privilege against
- 22 self-incrimination to any questions I would ask of you regarding interactions with Trump
- 23 campaign attorneys or investigators?
- 24 A Yes.
- 25 Q Have you ever been to the Trump Hotel?

1           A    I invoke my right to silence under the Fifth Amendment.

2           Q    In November of 2020, did you meet with anyone assisting the Trump  
3         campaign at the Trump Hotel in Washington?

4           A    I invoke my right to silence under the Fifth Amendment.

5           Q    Do you know Patrick Byrne?

6           A    I invoke my right to silence under the Fifth Amendment.

7           Q    Have you ever spoken with Mr. Byrne about issues relating to the 2020  
8         election?

9           A    I invoke my right to silence under the Fifth Amendment.

10          Q    Have you ever spoken to any analysts who you understood to be working  
11         with Mr. Byrne regarding the 2020 election?

12          A    I invoke my right to silence under the Fifth Amendment.

13          Q    Do you know General Michael Flynn?

14          A    I invoke my right to silence under the Fifth Amendment.

15          Q    Have you ever spoken to Mr. Flynn regarding the 2020 election?

16          A    I invoke my right to silence under the Fifth Amendment.

17          Q    Have you ever spoken with any investigator or analyst working on behalf of  
18         President Trump regarding the 2020 election?

19          A    I'm invoking my right to silence under the Fifth Amendment.

20          Q    Are you going to assert your Fifth Amendment privilege against  
21         self-incrimination to any questions I would ask of you regarding your interactions with  
22         attorneys, investigators, or analysts who were working on behalf of President Trump in  
23         connection with the 2020 election?

24          A    Yes, I am.

25          Q    Have you ever been to a ranch in South Carolina owned by Lin Wood?

- 1           A    I'm invoking my right to silence under the Fifth Amendment.
- 2           Q    Do you know Lin Wood?
- 3           A    I'm invoking my right to silence under the Fifth Amendment.
- 4           Q    Have you ever met or spoken with Steve Bannon?
- 5           A    I'm invoking my right to silence under the Fifth Amendment.
- 6           Q    What is Steve Bannon's relationship with Peter Navarro, if you know?
- 7           A    I'm invoking my right to silence under the Fifth Amendment.
- 8           Q    Do you know whether Mr. Bannon and Mr. Navarro worked together in  
9        devising a strategy to overturn the results of the 2020 election?
- 10          A    I'm invoking my right to silence under the Fifth Amendment.
- 11          Q    Have you ever heard the term Green Bay Sweep?
- 12          A    I'm invoking my right to silence under the Fifth Amendment.
- 13          Q    Have you heard that term used with respect to the 2020 election?
- 14          A    I'm invoking my right to silence under the Fifth Amendment.
- 15          Q    Mr. Ziegler, did you play any role in devising or implementing the Green Bay  
16      Sweep as a strategy for overturning the results of the 2020 election?
- 17          A    I'm invoking my right to silence under the Fifth Amendment.
- 18          Q    Have you ever discussed the Green Bay Sweep with Peter Navarro?
- 19          A    I'm invoking my right to silence under the Fifth Amendment.
- 20          Q    Are you going to assert your Fifth Amendment privilege against  
21      self-incrimination to any question I would ask you about concerning conversations with  
22      Mr. Bannon or Mr. Navarro regarding the 2020 election?
- 23          A    Yes.
- 24          Q    Take a look at exhibit 2. I'll represent to you this is the cover sheet of a  
25      much longer document or set of documents that's commonly referred to as the Navarro

1 Report.

2 Did you play any role in the preparation of the Navarro Report?

3 A I'm invoking my right to silence under the Fifth Amendment.

4 Q When did you begin working on the Navarro Report?

5 A I'm invoking my right to silence under the Fifth Amendment.

6 Q You've said publicly that there's a time when you were spending 6 hours a  
7 day on this project. Is that accurate?

8 A I'm invoking my right to silence under the Fifth Amendment.

9 Q What was the purpose of the Navarro Report?

10 A I'm invoking my right to silence under the Fifth Amendment.

11 Q The introduction to volume 1 -- actually let's take a look at exhibit 3.

12 Have you seen this document before?

13 A I'm invoking my right to silence under the Fifth Amendment.

14 Q I'll represent to you this is what I understand to be volume 1 of the Navarro  
15 Report released in December of 2020.

16 If you take a look at the introduction on page 5, the very end of the introduction,  
17 it says, "If, in fact" -- the second to last paragraph -- "If, in fact, compelling evidence  
18 comes to light proving the election was indeed stolen after a fait accompli Biden  
19 inauguration, we as a country run the very real risk that the very center of our American  
20 union will not hold."

21 At the very end of the next paragraph it says, "It is, therefore, critical that we get  
22 to the bottom of this matter. That is the purpose of this report."

23 Do you agree with that description of the purpose of the Navarro report?

24 A I'm invoking my right to silence under the Fifth Amendment.

25 Q Volume 1 of the report purports to describe election irregularities in six

1 States.

2 Where did the information come from for this report?

3 A I'm invoking my right to silence under the Fifth Amendment.

4 Q The report frequently refers to alleged irregularities, but at various times it  
5 cites -- or purports to cite -- evidence supporting certain election fraud claims.

6 Was it the intent of the report to highlight the allegations that had been made or  
7 to reach conclusions regarding the veracity or strength of the allegations that were made  
8 regarding the 2020 election?

9 A I'm invoking my right to silence under the Fifth Amendment.

10 Q A portion of exhibit 3 refers to allegations of bribery that  
11 occurred -- supposedly occurred -- in connection with the 2020 election in the State of  
12 Nevada.

13 Did you personally investigate allegations of election-related bribery in Nevada?

14 A I'm invoking my right to silence under the Fifth Amendment.

15 Q What did you do to investigate those allegations?

16 A I'm invoking my right to silence under the Fifth Amendment.

17 Q Did you travel to Nevada?

18 A I'm invoking my right to silence under the Fifth Amendment.

19 Q Who paid for your travel to Nevada?

20 A I'm invoking my right to silence under the Fifth Amendment.

21 Q Did you personally conduct any investigation or analysis regarding any of the  
22 claims of election fraud raised by the Trump campaign?

23 A I'm invoking my right to silence under the Fifth Amendment.

24 Q Are you going to assert your Fifth Amendment privilege against

25 self-incrimination to any questions I would ask of you regarding the preparation of the

1       Navarro Report?

2           A    Yes.

3           Q    Do you know someone named Mark Cook?

4           A    I'm invoking my right to silence under the Fifth Amendment.

5           Q    Who is Mr. Cook?

6           A    I'm invoking my right to silence under the Fifth Amendment.

7           Q    Did Mark Cook investigate any claims of election fraud raised by the Trump  
8       campaign?

9           A    I'm invoking my right to silence under the Fifth Amendment.

10          Q    Did you assist him in investigating claims of election fraud?

11          A    I'm invoking my right to silence under the Fifth Amendment.

12          Q    Do you know Phil Waldron?

13          A    I'm invoking my right to silence under the Fifth Amendment.

14          Q    Have you ever had any discussions with Phil Waldron about anything related  
15       to the 2020 election?

16          A    I'm invoking my right to silence under the Fifth Amendment.

17          Q    Did you assist Mr. Waldron in the preparation of any materials that were  
18       shared with Members of Congress in December 2020 or January of 2021?

19          A    I'm invoking my right to silence under the Fifth Amendment.

20          Q    Do you know Ivan Raiklin?

21          A    I'm invoking my right to silence under the Fifth Amendment.

22          Q    Have you ever had any discussions with Mr. Raiklin about anything related to  
23       the 2020 election?

24          A    I'm invoking my right to silence under the Fifth Amendment.

25          Q    Did you assist Mr. Raiklin in the preparation of any materials that were

1 shared with Members of Congress or White House personnel in December 2020 or  
2 January 2021?

3 A I'm invoking my right to silence under the Fifth Amendment.

4 Q Take a look at exhibit 4, please. Exhibit 4 is an email chain beginning on  
5 Sunday, December 27th, 2020, at 11:18 p.m., which you're not copied on. And I'll  
6 represent to you that's an email to Mark Meadows.

7 But the last in time -- or second to last in time -- email is from Mr. Raiklin to what  
8 appears to be your work email address on December 27th at 11:27 p.m.

9 Do you recognize that email?

10 A I'm invoking my right to silence under the Fifth Amendment.

11 Q Did Mr. Raiklin send you this email in late December of 2020 describing a  
12 path to victory for President Trump?

13 A I'm invoking my right to silence under the Fifth Amendment.

14 Q The email says, "Please disseminate accordingly."

15 Did you take any steps to disseminate the email and materials provided by Mr.  
16 Raiklin?

17 A I'm invoking my right to silence under the Fifth Amendment.

18 Q Had you spoken to Mr. Raiklin prior to receiving this email?

19 A I'm invoking my right to silence under the Fifth Amendment.

20 Q In the latest in time email in this chain, you send -- it appears that you send  
21 the email chain from your White House email to an email of [REDACTED]

22 Was that your email at the time?

23 A I'm invoking my right to silence under the Fifth Amendment.

24 Q Is that one of the emails that you searched for responsive documents?

25 A I'm invoking my right to silence under the Fifth Amendment.

1           Q     Is there a reason you did not produce this document in response to the  
2 subpoena?

3           A     I'm invoking my right to silence under the Fifth Amendment.

4           Q     Did you take any steps following up on the email that you received from Mr.  
5 Raiklin and the proposed path to victory?

6           A     I'm invoking my right to silence under the Fifth Amendment.

7           Q     Are you going to assert your Fifth Amendment privilege against  
8 self-incrimination to any questions I would ask of you regarding Ivan Raiklin or this email  
9 and its attachments?

10          A     Yes.

11          Q     If you look at the documents that are attached to or behind the email chain  
12 in exhibit 4, including various scenarios proposed for January 6th, 2021, and some  
13 spreadsheets that describe certain actions to be taken by the legislative, executive  
14 branch, and others.

15          Have you seen these documents before?

16          A     I'm invoking my right to silence under the Fifth Amendment.

17          Q     Take a look at exhibit 5. Exhibit 5 is an email from Ivan Raiklin to Mark  
18 Meadows and others within the White House sent on December 23rd, 2020, at 7:43 p.m.

19          Have you seen this document before?

20          A     I'm invoking my right to silence under the Fifth Amendment.

21          Q     The document includes an attachment or a portion of the email -- it's not  
22 clear whether it was attached or just pasted in the bottom of the email -- which is a  
23 memorandum for the President, "Subject: Operation Pence Card," December 23rd.

24          Have you seen this document before?

25          A     I'm invoking my right to silence under the Fifth Amendment.

1           Q     Have you ever talked to Mr. Raiklin about a proposal or a strategy hat that  
2     he had that he referred to as the Pence card?

3           A     I'm invoking my right to silence under the Fifth Amendment.

4           Q     Did you receive an email similar to this one in the same general timeframe,  
5     late December of 2020?

6           A     I'm invoking my right to silence under the Fifth Amendment.

7           Q     In this email and its attachments, Mr. Raiklin talks about various powers that  
8     he believed the Vice President had and actions that the Vice President could take on  
9     January 6th of 2021.

10          Have you ever had any discussions with anyone about the role of the Vice  
11     President in the joint session of Congress on January 6th?

12          A     I'm invoking my right to silence under the Fifth Amendment.

13          Q     Have you ever talked about that with Mr. Navarro?

14          A     I'm invoking my right to silence under the Fifth Amendment.

15          Q     Have you ever talked about that with anyone on the staff of the Office of  
16     Trade and Manufacturing Policy?

17          A     I'm invoking my right to silence under the Fifth Amendment.

18          Q     Take a look at exhibit 6, please.

19          Do you recognize this document?

20          A     I'm invoking my right to silence under the Fifth Amendment.

21          Q     The document is entitled, "Analyzing the Election: A Simple, Realistic, and  
22     Understandable Path for Uncovering Hard Evidence in the 2020 Election as Described by  
23     Election Experts."

24          Did you prepare this document?

25          A     I'm invoking my right to silence under the Fifth Amendment.

1           Q     Do you know which election experts are referred to or referenced in the title  
2     of the document?

3           A     I'm invoking my right to silence under the Fifth Amendment.

4           Q     Did you ever interview or talk to election experts regarding a path to  
5     uncovering hard evidence with respect to the 2020 election?

6           A     I'm invoking my right to silence under the Fifth Amendment.

7           Q     Do you know whether any of the steps that are set forth in this document  
8     were ever taken by anyone who was working on President Trump's behalf to overturn the  
9     2020 election?

10          A     I'm invoking my right to silence under the Fifth Amendment.

11          Q     Mr. Ziegler, when did you first meet Patrick Byrne?

12          A     I'm invoking my right to silence under the Fifth Amendment.

13          Q     Was he sharing information with you regarding projects that he was working  
14     on with respect to the 2020 election?

15          A     I'm invoking my right to silence under the Fifth Amendment.

16          Q     Were you acting as a conduit of information between Mr. Byrne and the  
17     analysts that he was working with and people at the White House?

18          A     I'm invoking my right to silence under the Fifth Amendment.

19          Q     Were you acting as a conduit of information between others who were  
20     working on President Trump's behalf, lawyers and investigators and folks at the White  
21     House?

22          A     I'm invoking my right to silence under the Fifth Amendment.

23          Q     Did Mr. Byrne call you on December 18th and ask that you help him get into  
24     the White House?

25          A     I'm invoking my right to silence under the Fifth Amendment.

1           Q     Prior to December 18th, had you spoken with Mr. Byrne about ideas for  
2     gaining access to voting machines in disputed States?

3           A     I'm invoking my right to silence under the Fifth Amendment.

4           Q     Did you ever talk with anyone within the White House or elsewhere about  
5     the authority that the President might have to authorize the seizure of voting machines?

6           A     I'm invoking my right to silence under the Fifth Amendment.

7           Q     Did Mr. Byrne ever tell that you that he was trying to get a meeting with the  
8     President to discuss that issue?

9           A     I'm invoking my right to silence under the Fifth Amendment.

10          Q     Have you ever had any discussions with Patrick Byrne about your view that  
11     the President was not being well-served by his White House advisers?

12          A     I'm invoking my right to silence under the Fifth Amendment?

13          Q     Did you ever assist Mr. Byrne, Mr. Flynn, Sidney Powell, and Emily Newman  
14     to get past security at the White House on December 18th, 2020?

15          A     I'm invoking my right to silence under the Fifth Amendment.

16          Q     What was your understanding as to why that group was at the White House  
17     on December 18th?

18          A     I'm invoking my right to silence under the Fifth Amendment.

19          Q     Who else assisted getting the group into the West Wing on December 18th,  
20     2020?

21          A     I'm invoking my right to silence under the Fifth Amendment.

22          Q     Do you know Patrick Weaver?

23          A     I'm invoking my right to silence under the Fifth Amendment.

24          Q     Did you and Mr. Weaver take steps to get Mr. Byrne, Mr. Flynn, Ms. Powell,  
25     and Ms. Newman into the White House without an appointment that night?

1           A    I'm invoking my right to silence under the Fifth Amendment.

2           Q    Do you know what that group was hoping to accomplish at the White House  
3    that evening?

4           A    I'm invoking my right to silence under the Fifth Amendment.

5           Q    Did you ever talk to either Patrick Byrne, Michael Flynn, or anyone else  
6    about what happened in the White House on December 18th?

7           A    I'm invoking my right to silence under the Fifth Amendment.

8           Q    Have you ever spoken with Michael Flynn?

9           A    I'm invoking my right to silence under the Fifth Amendment.

10          Q    And I may have asked you this earlier, but did you ever discuss with Mr.  
11       Flynn any plans to overturn the results of the 2020 election?

12          A    I'm invoking my right to silence under the Fifth Amendment.

13          Q    Have you ever spoken to President Trump, Mr. Ziegler?

14          A    I'm invoking my right to silence under the Fifth Amendment.

15          Q    Did you have a conversation with President Trump shortly before the end of  
16       his term in office in the Oval Office?

17          A    I'm invoking my right to silence under the Fifth Amendment.

18          Q    When you met with President Trump in the Oval Office in mid-January  
19       of 2021, did you discuss the 2020 election?

20          A    I'm invoking my right to silence under the Fifth Amendment.

21          Q    Did you tell him that you didn't believe that the people who worked with  
22       him -- let me start that again.

23            Did you tell him that you did not believe that the people working for him were  
24       fighting hard enough for him?

25          A    I'm invoking my right to silence under the Fifth Amendment and other

1       privileges.

2           Q     Did you tell him that you believed the election was stolen?

3           A     I'm invoking my right to silence under the Fifth Amendment and other  
4       privileges.

5           Mr. Kiyonaga. He is saying "other privileges."

6           I at the outset made clear that you were invoking under the Fifth, not to the  
7       exclusion of any other privileges, specifically the ones I articulated. So just say, "I'm  
8       invoking under my privileges."

9           The Witness. Yeah.

10              BY [REDACTED]

11           Q     I see Mr. Schiff has joined -- just in the nick of time, I might add.

12           Mr. Ziegler, where were you on January 6th?

13           A     I'm invoking my right to silence under the Fifth Amendment.

14           Q     Did you attend the rally on the Ellipse?

15           A     I'm invoking my right to silence under the Fifth Amendment.

16           Q     Did you watch the President's speech that afternoon?

17           A     I'm invoking my right to silence under the Fifth Amendment.

18           Q     Were you at or near the U.S. Capitol that day?

19           A     I'm invoking my right to silence under the Fifth Amendment.

20           Q     Were you at the Willard Hotel for any portion of that day?

21           A     I'm invoking my right to silence under the Fifth Amendment.

22           Mr. Kiyonaga. I'm sorry, what hotel was that.

23              [REDACTED] The Willard.

24           Mr. Kiyonaga. Willard.

25              [REDACTED] Willard Intercontinental, I think, might be the full name.

1           Mr. Kiyonaga. Yes. I didn't hear the word clearly.

2           BY [REDACTED]

3           Q     And your answer is you're refusing to answer that question on Fifth  
4     Amendment grounds?

5           A     Yes.

6           Q     Did you speak with Mr. Navarro on January 6th?

7           A     I'm invoking my right to silence under the Fifth Amendment.

8           Q     Did you speak to Mr. Bannon on January 6th?

9           A     I'm invoking my right to silence under the Fifth Amendment.

10          Q     Did you speak with anyone affiliated with the President Trump campaign on  
11     January 6th?

12          A     I'm invoking my right to silence under the Fifth Amendment.

13          Q     Mr. Ziegler, is it your intention to invoke your Fifth Amendment right against  
14     self-incrimination to any questions I would ask of you regarding your activities on  
15     January 6th and who you spoke to that day?

16          A     Yes.

17          Q     Were you expecting violence in the Capitol -- or in the Nation's Capital,  
18     meaning Washington, D.C. -- on January 6th prior to that date?

19          A     I'm invoking my right to silence under the Fifth Amendment.

20          Q     Did you instruct your wife or suggest that your wife leave town prior to  
21     January 6th because of concerns about violence?

22          A     I'm invoking my right to silence under the Fifth Amendment.

23          [REDACTED]     Mr. Schiff, do you have any questions of the witness? No? Okay.

24          Hearing none, I think we're done.

25          Mr. Schiff. I don't. Sorry. It took me long to hit the unmute button. I don't

1 have any questions. Thank you, sir.

2 [REDACTED] Thank you.

3 Okay. We can go off the record for a second.

4 [Discussion off the record.]

5 [REDACTED] Back on the record.

6 Okay. We're going to be in recess subject to the call of the chair. Now we can  
7 go off the record.

8 [Whereupon, at 10:58 a.m., the deposition was recessed subject to the call of the  
9 chair.]

1 Certificate of Deponent/Interviewee

2

3

4

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

6

7

8

9

10 Witness Name

11

12

13

14

15

Witness Name

Date