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

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11 INTERVIEW OF: HANNA ALLRED
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15 Wednesday, March 30, 2022

16
17 Washington, D.C.
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20 The interview in the above matter was held in Room 5480, O'Neill House Office
21 Building, commencing at 11:04 a.m.

22 Present: Representative Lofgren.

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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] STAFF ASSOCIATE

9 [REDACTED] INVESTIGATIVE COUNSEL

10 [REDACTED] PROFESSIONAL STAFF MEMBER

11 [REDACTED] FINANCIAL INVESTIGATOR

12 [REDACTED] FINANCIAL INVESTIGATOR

13 [REDACTED] SENIOR INVESTIGATIVE COUNSEL

14

15

16 For HANNA ALLRED:

17

18 TODD STEGGERDA

19 EMILY KELLEY

20 McGuireWoods

21 888 16th Street NW, Suite 500

22 Black Lives Matter Plaza

23 Washington, D.C. 20006

1

2 [REDACTED] All right. This is the transcribed interview of Hanna
3 Allred, conducted by the House Select Committee to Investigate the January 6th Attack
4 on the U.S. Capitol pursuant to House Resolution 503.

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

7 Ms. Allred. Sure. My name is Hanna Allred. The last name is A-l-l-r-e-d.

8 [REDACTED] This will be a staff-led interview, though members may
9 choose to ask questions. And we'll note that there are no members currently present.

10 My name is [REDACTED] and I am investigative counsel with the
11 select committee. With me from the select committee are [REDACTED] an
12 investigator; [REDACTED], another investigator; and joining us virtually is [REDACTED]
13 [REDACTED] another investigator.

14 At this time, I'd ask counsel to identify themselves for the record.

15 Mr. Steggerda. So I'm Todd Steggerda from McGuireWoods. I'm a partner
16 there in Washington. I'm joined by my colleague Emily Kelley, an associate at
17 McGuireWoods.

18 I am representing and our firm is representing Hanna Allred in her individual
19 capacity as a former RNC employee. I do not represent the RNC itself. I'm here in my
20 capacity as a lawyer for Hanna.

21 [REDACTED] Now, Ms. Allred, you are here voluntarily for this
22 transcribed interview. The ground rules for the interview -- I'll go over some ground
23 rules for the interview, I should say.

24 There's an official court reporter transcribing the record of this interview. The
25 reporter's transcription is the official record of the interview. This proceeding is also

1 audio and video recorded.

2 I'm going to ask that you please wait until each question is completed before you
3 begin your response, and we will do our best to wait until your response is complete
4 before we ask the next question.

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

8 Please give complete answers to the best of your recollection. If a question is
9 unclear, please ask for clarification. If you do not know an answer, please just say so.
10 As we previously noted to you, providing false testimony to Congress could be subject to
11 criminal penalties.

12 Again, if you need any breaks or otherwise want to discuss anything with your
13 lawyers at any time, just please let me know.

14 Do you have any questions before we begin?

15 Ms. Allred. No.

16 [REDACTED] Okay.

17 EXAMINATION

18 [REDACTED]

19 Q Now, Ms. Allred, do you recall that we previously met I think last December
20 for an informal interview?

21 A Yes.

22 Q All right. Today's interview will be very similar to that informal interview,
23 and we'll go through many of the same topics.

24 Can you give us, please, your date of birth?

25 A [REDACTED]

1 Q And where do you reside?

2 A I'm sorry. What was the question?

3 Q Where do you reside?

4 A Oh. [REDACTED]

5 Q Okay. Do you have a Twitter account?

6 A I do.

7 Q And was that the same Twitter account you had in December 2020 and
8 January '21?

9 A Yes.

10 Q And what's your handle?

11 A It's @ h-a-n-n-a-l-l-r-e-d.

12 Q And do you have an Instagram account?

13 A I do.

14 Q And what's your handle there?

15 A It's the same. Do you want me to spell it again? It's h-a-n-n-a-l-l-r-e-d.

16 Q And was that the same account you had in December 2020?

17 A Yes.

18 Mr. Steggerda. There's only one "A" in there, in case you get a little confused.

19 [REDACTED] Yeah. I've seen it with the Gmail account.

20 Mr. Steggerda. Exactly.

21 [REDACTED] Yeah.

22 [REDACTED]

23 Q And can you give us your email address?

24 A It's [REDACTED]

25 Q And what was your professional email account you had in December 2020?

1 A It would've been my RNC email, which was h-a-l-l-r-e-d @gop.com.

2 Q And tell us a bit about your educational background.

3 A Starting in college?

4 Q Yeah.

5 A Sure. So I went to Texas Tech University. I graduated in 2015 with a
6 degree in public relations.

7 Q Okay.

8 Let's go through some of your professional background. Can you start a bit with
9 your work for the House of Representatives?

10 A Sure. I actually started -- I don't know if you want to hear about my
11 internship. I interned in the summer of 2014 for Congressman Michael McCaul from
12 Texas. After graduation, I interned for him again for about a week before I got my first
13 job with Congressman Roger Williams from Texas as his scheduler.

14 I was in that position for about 2 years, kind of helping out with some press on the
15 side. That wasn't my official job. And then I eventually switched over to press
16 secretary summer of 2017. About a year later, in 2018, I was promoted to
17 communications director.

18 And then March of 2019, I left the Hill and started my job at the RNC.

19 Q And what was your first role at the RNC?

20 A The title is chief copywriter on the digital team.

21 Q And what were your roles and responsibilities as chief copywriter?

22 A At the time, when I first joined, I was writing email fundraising copy.

23 Q Okay. And then did that role expand or change in the future?

24 A Yes. I was there for just under 2 years. So, in addition to writing email
25 fundraising copy, I started writing some copy for fundraising text messages, really

1 anything that required fundraising copy. I ended up managing a team of three
2 copywriters, so I got that responsibility as well.

3 Q Let's go to January of 2020.

4 A Okay.

5 Q Who were you working with as a copywriter, as chief copywriter, then?

6 A I had a partner in January of 2020 named Austin Brown.

7 Q And did Mr. Brown eventually leave the RNC that year?

8 A Yes. I believe he left in February.

9 Mr. Steggerda. If I may intrude, when you say "partner," what do you mean?

10 Ms. Allred. He had a different title. His title was senior copywriter, I think.

11 But we essentially did the exact same job, writing fundraising copy.

12 [REDACTED]

13 Q In January '20, who did you report to?

14 A Austin Boedigheimer.

15 Q Do you want to spell that?

16 A I'll see if I can. I believe it's B-o-e-d-i-g-h-e-i-m-e-r?

17 Q It is.

18 A Oh, great.

19 Q What's Austin's title?

20 A His title was either digital director or deputy digital director. I'm not sure.

21 Q Okay. Did Austin report to an individual named Kevin Zambrano?

22 A I believe so. That was my understanding.

23 Q And was Mr. Zambrano the chief digital officer for the RNC?

24 A Yes, I think so.

25 [REDACTED] I will note for the record that Ms. Lofgren has joined the

1 interview.

2 [REDACTED]

3 Q So you reported to -- Austin reported to Kevin Zambrano.

4 A Correct.

5 Q Are you familiar with an individual named Gary Coby?

6 A Yes, I am.

7 Q And is it fair to say he was the digital director for the Trump campaign?

8 A I'm not sure what his title was. I did see him as, like, the leader of the
9 digital team while we were there.

10 Q And did that remain true through post-election?

11 A Yes, I would say so.

12 Q So is it fair to say that Mr. Boedigheimer reported both to Mr. Zambrano and
13 to Mr. Coby.

14 Mr. Steggerda. If you know.

15 Ms. Allred. I'm not entirely sure. We never had, like, an organization chart or
16 anything. I know they spoke, but I'm not sure if he actually reported to Gary or not.

17 [REDACTED]

18 Q Did you understand Mr. Coby to be more senior than Mr. Boedigheimer?

19 A Yes.

20 Q So is it fair to say, by leading the department, you all, to some degree,
21 through the org chart, reported to Mr. Coby --

22 A Um, I --

23 Q -- indirectly or directly?

24 A Yeah, I mean, I never spoke to Gary Coby. But, yes, he was, like I said, what
25 I would assume to be the leader of the department.

1 Q Did you also understand Mr. Boedigheimer to be the head of the fundraising
2 team?

3 A Yes, he did lead the fundraising team, from what I'm aware of.

4 Q And what did you understand to be --

5 Mr. Steggerda. Do you mean digital fundraising, or are you talking fundraising
6 more broadly? Because there's a major donor program.

7 [REDACTED] Yeah. I'm not talking about -- I'm talking within --

8 Ms. Allred. Just digital.

9 [REDACTED] -- within your --

10 Mr. Steggerda. The digital.

11 [REDACTED] -- your digital world.

12 Ms. Allred. Yes, he led the digital and fundraising team.

13 [REDACTED]

14 Q What did you understand to make up the digital fundraising team?

15 A What do you mean?

16 Q When you say "he led the team," what is that team?

17 A It was all online fundraising efforts, like, helping -- like, leading -- from my
18 understanding -- to help us reach our fundraising goals for the joint fundraising
19 committee.

20 Q And who was on that team?

21 A I mean, towards the end, it was probably 20 or 30 people. I don't think I
22 could name them all, but do you want me to name as many as I can?

23 Q No. Was it broken down into any kind of sub-teams that you could name?

24 A Oh, yes, it was. We had the copy team, which I was on that team. There
25 was the email fundraising team. There was the text message team, the data team, the

1 ads team. That's all I can remember. Oh, graphics. We had a graphics team.

2 Q Do you recall who led the text team?

3 A I don't know who led that team.

4 Q Do you know who led the data team?

5 A I believe it was Robert Trivett.

6 Q Do you know who led the ad team?

7 A I think it was Daria Grastara, I think is how you say her last name.

8 Q From --

9 A She was from Direct Persuasion.

10 Q -- Direct Persuasion?

11 A Yes.

12 Q Do you know who led the graphics team?

13 A It would've been -- I think it was Jessica Woodie would've led the graphics
14 team.

15 Q And was there a leader of the email fundraising team separate from Austin?

16 A As, like, a subset of the fundraising team, there was someone who was in
17 charge of the email team. It would've been Kenneth Mika.

18 Q And what about the text team?

19 A I'm not sure who led -- I mean, there was -- I know we've gone over there
20 was, like, peer-to-peer texting and regular texting. I'm not sure who led either of those.

21 Q And when you say -- just so we have a clear record, on the text team, when
22 you say "regular texting" and "peer-to-peer texting," what do you mean?

23 A "Regular texting" meaning what we call our house file texting. These are
24 donors or users who have opted in to receive text messages from the Trump team or the
25 RNC.

1 Q And when you say "peer-to-peer," what do you mean there?

2 A I'm not entirely sure how peer-to-peer works. It was -- we worked with
3 Opn Sesame on that. It was some sort of a way to contact people who had not opted in
4 to receive text messages.

5 Q Is it fair to say that Opn Sesame provided a service by which they could send
6 individual texts to people who had not opted in?

7 A From my understanding, yes, they text people who have not opted in. And
8 they were a vendor of the joint fundraising committee.

9 Q And that's Gary Coby's company, correct?

10 A From what I know, I believe so.

11 Q So, at some point after Mr. Brown left the RNC, did anyone else join the copy
12 team?

13 A Yes. Alex Murglin joined I believe in March of 2020.

14 Q Okay. Did anyone else join that calendar year?

15 A Yes. That summer, Ethan Katz and Alex Blinkoff both joined.

16 Q And did those three report to you?

17 A Yes. I managed them.

18 Q Now, within those three, was there any difference in reporting structure?

19 A I would say they all reported to me equally. Alex Blinkoff was maybe a little
20 more senior to them, to the other two. They didn't report to him, but he had more
21 responsibility.

22 Q And why did he have more responsibility?

23 A He's a bit older than them, from what I know. He had a professional
24 writing background, from what I remember.

25 Q And around what age were Alex, Ethan, and -- well, Alex Murglin and Ethan?

1 A I believe Ethan was right out of college, so he probably would've been 22 or
2 23. Alex Murglin, I want to say he was maybe 24, 25.

3 Q And Mr. Blinkoff, to the best of your knowledge?

4 A I think he was about 26.

5 Mr. Steggerda. And how old were you at the time?

6 Ms. Allred. In 2020, I would've turned 27 [REDACTED].

7 [REDACTED]

8 Q Now, from the summer of 2020 through election day, were both Alexes and
9 Ethan copywriters who reported to you?

10 A They were on my team, and -- yes, they did copywriting.

11 Q And they reported to you?

12 A Yes. I was their manager.

13 Q Okay.

14 Now, in 2020, can you tell us a bit about the physical structure that the digital
15 team was in? Where were you all?

16 A So, by 2020, the digital team would be on the fifth floor at the office in
17 Virginia. We had multiple suites that were combined. The suite I was in, it would've
18 been a mixture of RNC and Trump campaign staff on the digital team. In the other
19 suites, there was Open Sesame, Direct Persuasion -- I think maybe that's it. We all
20 had -- all of our suites were connected on one floor.

21 Q And, then, you said that's the fifth floor, correct?

22 A That's fifth floor.

23 Q Is that what people referred to as the "annex" often?

24 A The fifth floor?

25 Q That building is the annex?

1 A Yes, we refer to it as the annex.

2 Q Yeah.

3 Now, can you tell us a bit of your understanding of what TMAGAC is?

4 A TMAGAC? So it was Trump Make America Great Again Committee, I'm
5 pretty sure. That was the joint fundraising committee, from what I know.

6 [REDACTED]

7 Q And is it fair to say it was the joint fundraising committee between the RNC
8 and the Trump campaign?

9 A From my understanding, yes, it was between RNC and campaign.

10 Q And was it your understanding that TMAGAC focused on raising money from
11 small-dollar donors?

12 A I was only ever aware of online fundraising efforts for small-dollar donors.
13 If they had large donors, I wouldn't know about it.

14 Q So, to the best of your understanding, it was focused on small-dollar donors.

15 A Yes, just small-dollar, online. I mean, someone could make a large
16 donation, but that wasn't what we were after.

17 Q Yeah. Yeah.

18 All right. I want to talk a bit about the copywriting process.

19 A Okay.

20 Q When you joined the RNC, were you trained on how to be a copywriter?

21 A I mean, I have a writing background doing communications. I've never
22 done fundraising copy specifically. I don't remember any specific formal training. I
23 think, you know, they explained some jargon to me that we used in digital, but, for the
24 most part, I looked at old pieces of copy that were written and worked off of that.

25 Q Did anyone tell you what made effective copy or ineffective copy?

1 A I'm sure -- that's probably a conversation I had and I just don't remember.
2 It was 3 years ago at this point.

3 Q Is it fair to say that Austin would've been the one to -- to the extent you
4 were trained, it would've been by Austin, as your direct supervisor?

5 A If I received training, it would've come from Austin.

6 Q Yeah. And any feedback you got going forward about your work would've
7 come from Austin, as your supervisor, correct?

8 A Yes. He would've provided edits and feedback.

9 Q So let's talk a bit about -- so, by early to mid-2020, you're drafting both
10 fundraising emails and texts for TMAGAC.

11 A Some for TMAGAC, some were for just the RNC, and some would've just
12 been for the Trump campaign.

13 Q Okay. So explain to us how that breakdown, like, happened.

14 A For the most part, I would say majority of emails would -- from what I know,
15 would go to TMAGAC, out for TMAGAC. I don't know why, but the way the text
16 messaging was set up, like, RNC had a text messaging profile and the campaign had a text
17 messaging profile. I don't believe TMAGAC did. So those went out separately for
18 those.

19 Q Okay. So is it fair to say that -- so you said the majority of your emails were
20 TMAGAC emails.

21 A Majority of them, yes.

22 Q But then the texting was separated because of the profile situation you just
23 mentioned.

24 A That's my understanding.

25 Q Okay.

1 So let's talk about how the email drafting-to-publishing process happens.

2 A Okay.

3 Q And to the extent that anything -- we're going to talk about a variety of
4 topics, about just how they worked.

5 A Uh-huh.

6 Q Unless you tell me differently, I'm going to presume that it was consistent
7 from mid-2020 through post-election.

8 A Okay.

9 Q So, if anything changed over that time, I'm going to ask you to clarify that.

10 A Okay.

11 Q Okay.

12 So, when an idea for fundraising -- where -- who gave you your assignments for
13 fundraising emails and texts?

14 A I don't remember getting specific assignments. There were programs we
15 ran every single month that, you know, weren't necessarily assigned; I just knew they
16 needed to be written. You know, for example, like, an end-of-month push, we did that
17 every month for -- you know, if it was around Christmas, I knew Christmas merchandise
18 needed to be marketed. So I don't -- those things, like, weren't specifically assigned.

19 Outside of that, we really, you know, would see what was going on in the news,
20 what President Trump was talking about on Twitter or on TV, the statements coming out
21 from the RNC and the campaign. We would turn those into fundraising emails.

22 Q Now, would you do that on your own, or would you get directives from
23 Austin about how many emails and topics?

24 A Again, for the topics, we were watching the messaging coming out of the
25 committee and the campaign and from the President himself and what his family was

1 talking about.

2 In terms of how many emails, it wouldn't necessarily be, like, "Hey, we need to get
3 10 emails today." We had a fundraising goal to hit, and however many emails or text
4 messages it took to reach that goal would be how many we did.

5 Q Okay. So, if it was a larger goal or the fundraising emails were not as
6 successful on a per-email basis, you might increase the number of emails or text
7 messages that went out that day?

8 A Yeah. So, in early 2020, I wasn't helping with that effort. As it got closer
9 to the election, I was paying more attention to goals and adjusting the schedule.

10 Q Yeah.

11 I want to return back, though, to where the assignments came from. Are you
12 saying that you would initiate these emails and just provide them to Austin? Or were
13 you actually -- was Austin ever requesting emails from you on certain topics or from
14 certain senders?

15 A When I first started, yes, he was, like, requesting topics, giving me
16 assignments. But the longer I had been there, the less he was requesting. Again,
17 whatever was being put out publicly, we would turn it into a fundraising email.

18 Q So let's talk about from July 2020 forward.

19 A Okay.

20 Q Is it fair to say that you were kind of -- I don't want to use the term
21 "automated," but, by that point, were you effectively creating work product without
22 being specifically requested and Austin expected you to just provide those to him for
23 review?

24 A I would say, at that point Alex Murglin was already there. I don't
25 remember if anyone else had joined by that point. I mean, by that point, it was my

1 responsibility to make sure that we had enough email copy. I don't remember him
2 requesting, like, every single specific email that I was writing.

3 Q Well, what I'm trying to get a sense of is just more broadly. For example, if
4 there's an email from Donald Trump, Jr. --

5 A Okay.

6 Q -- is that something that Hanna Allred came up with? If I see an email from
7 TMAGAC goes out, do I just assume that was initiated by Hanna Allred? Or an email
8 comes out from Newt Gingrich, from TMAGAC, asking for money or -- I'm trying to get a
9 sense of how much of that is initiated by Mr. Boedigheimer versus more so it's in your
10 wheelhouse to kind of get this initiated and for his review.

11 A I mean, again, we were really monitoring Donald Trump, Jr.'s Twitter as well
12 and interviews he was doing. From what I remember, if he wasn't actively talking about
13 anything publicly, we most likely weren't writing an email from him. We would try to
14 take his words and turn it into an email.

15 Q So let's talk a bit about that. In deciding surrogates, whether emails came
16 from President Trump versus came from other individuals, how was that decided?

17 A It really wasn't a decision, just because of the volume we were pushing out.
18 If there was a very timely topic and President Trump was talking about it and members of
19 his family were talking about it, we were just going to write an email from probably all of
20 them.

21 If you're thinking of -- yeah, I mean, best as I can remember, it wasn't --

22 Mr. Steggerda. Are you saying -- he's asking you about, like, what you remember
23 about, like, the decision to use different surrogates, like Donald Jr.

24 Are you suggesting that just -- what I heard from your answer -- I want to make
25 the record clear on it. But are you suggesting that, kind of, the selection of surrogates

1 just kind of followed who was talking about what, and then it made sense to use that as a
2 surrogate? Or was it more like, you know, we want to use one from, you know, the
3 family, we want to use one from the President himself? Or, like --

4 Ms. Allred. Right.

5 Mr. Steggerda. He's trying to understand what you remember --

6 Ms. Allred. Oh.

7 Mr. Steggerda. -- about how you decided about surrogates.

8 Ms. Allred. There wasn't a specific conversation. I know there was just, like, a,
9 "Here's the surrogates we have available, if you want to use them." And if they were
10 talking about a subject that was timely and they were available to use, then I would take
11 whatever they were talking about and turn it into an email.

12 [REDACTED]

13 Q So who provided you with that list of surrogates?

14 A I don't remember it ever being a formal list, but Austin would've let me know
15 who was available to use.

16 Q And who were the most common surrogates that you recall?

17 A Besides President Trump, we used Donald Trump, Jr., Eric Trump, Lara
18 Trump. They were probably our most frequently used.

19 Q And why those individuals in addition to President Trump?

20 A We saw a lot of success using their names. I think, you know, the American
21 people reading an email want to hear from members of the Trump family. And, to my
22 knowledge, they were, you know, doing efforts on behalf of the campaign, so they were
23 available to use.

24 Q Uh-huh.

25 So would you -- what I'm trying to get a sense of from you is, were you given a list

1 of surrogates and then actively monitoring their public statements just all the time and
2 then creating content without, kind of, more specific assignments from
3 Mr. Boedigheimer?

4 A Yeah, we were monitoring what they were saying all the time. Really,
5 probably the only time -- if Austin was going to get me an assignment, he may say, like,
6 "Hey, we have this new T-shirt coming out. Can we get an email on it?" I'm not aware
7 of merchandise, like, coming down the pike, so he would let me know if something new
8 like that was coming up that we needed to market.

9 Q And you gave assignments to Ethan Katz, Alex Blinkoff, and Alex Murglin,
10 correct?

11 A Yes, I would let them know what copy we needed.

12 Q Okay. I want to make sure I'm understanding what you're saying so the
13 record is clear. Is it fair to say, then, that the copy from TMAGAC then -- it sounds like it
14 was, to some degree, initiating from you as a hub?

15 A I mean, fundraising copy came from the copy team that I was on for
16 TMAGAC.

17 Q Yeah. But I'm talking more specifically as to who's initiating the selection of
18 surrogates, who's initiating the substance of the emails. Is it fair to say that you were
19 the hub?

20 A I don't think that's fair to say. I was not in charge of what surrogates we
21 were using. I don't even know how we got approval on what surrogates to use, in terms
22 of content we were putting out.

23 Q Uh-huh.

24 A I mean, I'll go back to our end-of-month example where we do it every
25 month. I might, you know, tell one of the copywriters, "Hey, can you write an

1 end-of-month email from Lara Trump?" And, again, they would, you know, go to her
2 Twitter, what interviews she's been doing, and pull her language to use for that email.

3 Q Yeah. No, I understand that you were given a list of surrogates perhaps to
4 use. But what I'm trying to get a sense of is that --

5 Mr. Steggerda. I think she said she wasn't given a list of surrogates to use. She
6 just knew -- I think you asked her that; she said no. I think she said she knew who they
7 were and that Trump -- that the candidate, and then Trump family was a common
8 surrogate that they used.

9 [REDACTED] Okay.

10 Mr. Steggerda. I don't know, but I think --

11 [REDACTED]

12 Q I guess what I'm saying, though -- you're saying that you used your discretion
13 by having a general understanding of the people that were the most commonly used
14 surrogates or the most effective surrogates.

15 A I mean, members of the Trump family have been used since before I started.

16 So --

17 Q Yeah.

18 A -- it was my understanding that, yes, they were available to use.

19 Q But a decision to write an email from Lara Trump, you know -- writing an
20 email from Lara Trump today, is that something you were told or something you would
21 give to the copywriters to go and effectuate?

22 A I mean, using surrogates was very normal. It was very part of our everyday
23 process. It wasn't like we needed to write a set amount of surrogate emails. It was
24 just, we knew we needed -- like, if it's an end-of-month push, we're going to use all of our
25 surrogates. It's been that way since before I started, so we just continued it.

1 Q I understand that. But what I'm trying to just clarify is, like, just a -- it's
2 almost, like, a logistical point. I'm trying to get a sense of, who is telling who to do what,
3 right?

4 So I understand that there are things that are within your wheelhouse --

5 A Right.

6 Q -- meaning, you provide assignments to the three copywriters that report to
7 you, correct?

8 A Yes, I would provide them assignments.

9 Q And then, when those assignments are edited and in a more final form, you
10 would provide those to Austin for review, correct?

11 A Yes, he would review the copy.

12 Q And did you also draft copy yourself that you would have Austin review?

13 A Yes, I was also drafting copy on my own.

14 Q All right.

15 So the question I'm trying to get at is that, if I read an email from TMAGAC and I'm
16 trying to find out what was the inception of that concept, what's the answer to that, on
17 average? It has to start somewhere.

18 A I mean, again, these processes were in place when I started. If they were
19 talking about something openly online or on interviews, that is where we got most of our
20 ideas from.

21 Q I get that. But someone has to decide an email is being written on a
22 specific topic. Someone has to decide that, right?

23 A I mean --

24 Q So what I'm asking is that, on a day-to-day basis, copy is being drafted and
25 finalized, but someone has to decide who the surrogate is going to be and what the topic

1 is going to be. And from what I'm hearing from you, either Austin was giving directives
2 or you were giving directives.

3 So I'm trying to just clarify -- understanding that there are certain -- you know,
4 end-of-month emails are going to happen every end of month and, you know, there are
5 certain events that I'm sure are just, like, habitual.

6 But not everything is habitual. Some surrogate emails are specific to the topic of
7 the day, right?

8 A Yes.

9 Q So who starts that process, is what I'm trying to understand.

10 Mr. Steggerda. Look, I'm not doing formal objections or anything, but I
11 want the -- you know, we all want her testimony to be as clear as possible.

12 What she's told you now is: Sometimes it's directed. She's given you examples
13 of that. Sometimes she pulls from the President's Twitter. So she's really answered
14 your question in terms of it comes -- it would initiate in a variety of ways.

15 You're trying -- I mean, I see -- you're asking the question, "Well, which is it, this or
16 that?" She's already kind of given you a breadth of ways that these things might initiate.
17 And I think that's why she's struggling with it.

18 [REDACTED] Respectfully, I would disagree. I don't think that's what
19 she's said.

20 I'm not asking the point of where do the ideas come from. I understand that
21 they may come from a press release, they may come from comms, they may come from a
22 Twitter account. I'm not asking how the substance fills the email.

23 I'm just asking, when an email -- when someone assigns an email, who is the initial
24 person doing that? Right?

25 I can imagine a world where Austin says, "I need four emails on this topic." I can

1 imagine a world where Hanna says, "As the chief copywriter, it would be good to get
2 emails on these topics."

3 Mr. Steggerda. I get it.

4 [REDACTED] So I'm trying to understand --

5 Mr. Steggerda. Okay.

6 [REDACTED] It's not the ideas.

7 Ms. Allred. Sure.

8 [REDACTED] Who is the one --

9 Mr. Steggerda. Yeah, separate it from, like, the actual substance of the
10 messaging, but talk about, like, how does the process of the email creation start from
11 your team's perspective.

12 Ms. Allred. Sure.

13 Mr. Steggerda. Maybe that helps.

14 [REDACTED] Yeah. Yeah. Thank you.

15 Ms. Allred. Sorry.

16 So I think we talked about it last time; we have, you know, an online project
17 management tool that we use, Trello. That's where all of our assignments were kept.

18 So, yes, if we wanted to get an email on a particular tweet from the President, I
19 would probably put that tweet link in Trello and assign it to one of the copywriters and
20 say, "Hey, the President tweeted this. Can you turn it into an email?"

21 [REDACTED]

22 Q Uh-huh. So that's an example of you being the initiator, fair?

23 A I assigned it.

24 Q Yeah. And then would Austin also sometimes act in that same capacity?

25 A Sure. If he had seen something online that maybe I had missed, he might

1 send it to me and say, "Have we done an email on this? If not, can we get one?"

2 Q Yeah. And was it predominantly your role to serve as, for lack of a better
3 term, the initiator?

4 A I mean, it was my role to make sure that we had enough copy. And, I
5 mean, I also relied on the team to be monitoring Twitter, and if they saw anything that
6 would make, you know, a good fundraising email, then, I mean, I relied on them for that
7 too.

8 Q Uh-huh. Okay. That's helpful.

9 So, when you provided those -- when you initiated the request for copy, was that
10 typically based on what you thought was the relevant news of the day that would likely
11 be effective in fundraising? Is that fair?

12 A I think we -- I mean, we wanted to get, yeah, what they were talking about
13 out there how we could, yeah.

14 Q Okay. So tell us about where you would look to get inspiration, let's call it.

15 A Sure.

16 I mean, as we all know, President Trump is very active on Twitter. So we would,
17 like I said, monitor that.

18 Any surrogate that we're using, we would monitor their Twitter as well. You
19 know, if they had any interviews that are online or on TV, we would watch them. Any
20 speeches they were giving, we would look for the transcript, try to pull directly from that.

21 As well as, you know, the RNC and campaign are putting out statements
22 frequently. We're watching what they're saying. There were -- I believe from the RNC
23 communications team, they were circulating internal talking points of what they were
24 focused on for that week for messaging.

25 So we would draw from all of those things.

1 Q When you used President Trump as a sender, is it fair to say that -- let me
2 rephrase that.

3 It appears a lot of the emails that come out from TMAGAC are from President
4 Trump. Is that fair?

5 A We wrote a lot for him.

6 Q Yeah. And these questions are not meant to be, like, "gotcha" questions.
7 Like, some of these questions are going to -- you know, it's said in a more broken-down
8 way, because we're in a transcript, so it has to read like a question, question, answer.

9 A Uh-huh.

10 Q And here, you know, we're doing a lawyer thing, laying foundation.

11 But what I'm asking is: President Trump, is it fair to say that he is the most used
12 sender for TMAGAC emails?

13 A I don't have a --

14 Q Which, again, would not be surprising, because he's the candidate. I'm
15 not --

16 A Right. I mean, I don't have a breakdown.

17 Q Yeah.

18 A I would assume -- I mean, out of all of our surrogates, we probably used him
19 the most.

20 Q Yeah.

21 And is it fair to say that it was understood that for what his emails would be, the
22 substance of his emails would be based on what he was talking about that day or in the
23 news?

24 A We tried to use his direct language in the emails, so --

25 Q Yeah.

1 A -- yeah.

2 Q And was that the same for other surrogates? You would want to use their
3 direct language and try to capture their voice in the emails?

4 A We would use their direct language, yes, to capture their voice.

5 Q Yeah.

6 Did you also get directives from Austin or anyone else to focus on different topic
7 areas?

8 A I mean, I guess, you know, he might say, like, "Hey, don't forget the debates
9 this weekend. Our emails should focus on the debate," things like that.

10 Q Yeah. Any other feedback you would get?

11 I'm trying to get a sense of -- and here's what I'm trying to understand, just so you,
12 you know, feel free to speak freely on it.

13 I'm trying to get a sense of, are the subject matters of the emails so clear to you
14 that you don't need a supervisor to weigh in to provide guidance early in the process,
15 because it's clear what we're going to be talking about? Or is there more guidance
16 coming from Austin as to, let's pivot here, let's do this, let's do that?

17 A And, again, because I know you said we're talking about the whole year of
18 2020 --

19 Q Well, I'm focused on mid-2020 forward.

20 A Okay. So -- okay.

21 I mean, as time went on, Austin provided less and less feedback to me. On
22 occasion, you know, he would say, "Hey" -- and I don't have a specific example, but he
23 would say, "Hey, the campaign wants to focus on this. Can we get an email on it?"
24 And we would.

25 Q And how would he deliver those directives to you?

1 A Typically, they would be in person in his office.

2 Q Okay. Would he email you sometimes?

3 A We didn't really email. It most likely -- if it wasn't in his office, it probably
4 would've been on Microsoft Teams.

5 Q Okay.

6 And so you give an assignment. How did you transmit the copy -- you give an
7 assignment to the copywriters. How would you transmit that assignment? Is that in a
8 specific program or --

9 A Yes. We used the online, I don't know, platform or what. It was called
10 Trello.

11 Q And that's T-r-e-l-l-o?

12 A Yes. That's correct.

13 Q And, then, when the copywriters drafted a copy and provided it back to you,
14 how would they provide that copy to you? On what platform?

15 A So it'd be on Trello. They have what -- they're called "cards," like,
16 assignment cards. We would communicate on those because, you know, it has all the
17 comments; you could see the history of it. They would paste a Google Doc that
18 contained the copy, and they would tag me in it, and it gave me a push notification that
19 their copy was ready to be reviewed.

20 Q And, then, after you reviewed and revised that copy, what would you do
21 with that copy?

22 A So we might go back and forth on edits a few times. But once, you know, it
23 was ready to go on my end, I would pass it over to Austin on Trello, where he would
24 review it.

25 Q And, then, after Austin had approved the copy, what did he do with it?

1 A So, I mean, physically, the copy is on Trello, like, moving down the line of the
2 process we had. But after Austin reviewed it, it would be marked as ready for approval.
3 And, at that point, my coworker Julia Trent was the one who, what we call, packaged
4 everything together in an email for approvals.

5 Q Okay. We'll talk about the approvals in a bit.

6 So I want to talk just generally about what makes effective fundraising emails.
7 So we see in a lot of the emails -- just generally fundraising emails, not specific ones -- talk
8 like "match," "impact."

9 So tell me a bit about what are the things that you understood made effective,
10 like, marketing or fundraising, what kind of tactics.

11 A I mean, like you said, the "match" and "impact" language, those typically
12 performed well. People liked those.

13 Urgency, you know, including a deadline.

14 And, again, using -- if President Trump was the sender, those typically did the best.
15 People liked to hear from him.

16 Q Yeah. Is it fair to say that hyperbolic language was more effective than
17 more reserved language?

18 A I mean -- I mean, I'm sure you've read a lot of our emails by now. I mean,
19 they're written how President Trump speaks. So the more they sounded like President
20 Trump and we used his direct language, the more people -- they performed better.

21 Q And how would you describe how President Trump speaks?

22 A I think, you know, he speaks very excitedly, sometimes maybe a bit
23 aggressively. I don't know if you've noticed his style; he capitalizes random words. I
24 mean, that's just how he -- that's how he tweeted, so that's how we wrote our emails.

25 Mr. Steggerda. In your fundraising copy, did you view it as your goal to try to

1 capture the voice of the President or whatever other surrogate -- the President's
2 obviously not a surrogate; the President's the President. But --

3 Ms. Allred. Right.

4 Mr. Steggerda. -- what's your sense of, like, the voice, whether that was
5 important? Was that something you were thinking about?

6 Ms. Allred. Yeah, definitely. You know, the -- I mean, yeah, it's how, I guess,
7 our emails, you could say, branded. You know, they all looked very similar. They had
8 similar language.

9 [REDACTED]

10 Q And so, with President Trump's emails, you'd try to capture his -- in
11 capturing his voice, you wanted to capture -- is it fair to say there was hyperbolic
12 language or inflammatory language that came from him that you wanted to capture in
13 the email?

14 Mr. Steggerda. Do you know what the word "hyperbolic" means?

15 Ms. Allred. I don't know. Could you explain it?

16 Mr. Steggerda. That's why -- he was very nice. He asked, put it in your words.
17 You did. But I want to make sure you know what you're answering.

18 [REDACTED] Yeah. That's a good point, Todd. Thank you.

19 And, always, anything I say, do not hesitate to ask for clarification.

20 Ms. Allred. Okay. Thank you.

21 [REDACTED]

22 Q In looking at some of the emails, what you're saying rings true, in that -- and
23 I just want to confirm that it's as all intentional, right? Is it fair to say you want someone
24 reading a fundraising email from President Trump to feel like it's coming from him?

25 A From my understanding, that was the goal. I've never been on the other

1 end of receiving emails, so I have no idea if people actually believe it's from President
2 Trump. But, from my understanding, yes, we wanted it to feel authentically from
3 President Trump.

4 Q Okay. And if he spoke more aggressively or felt more passionately about a
5 topic, you would naturally -- and you were going to speak on that topic, you would want
6 that to be reflected in the fundraising copy. Is that fair?

7 A I mean, if he was speaking passionately about a topic and was tweeting
8 about it, we would take probably that exact tweet and paste it in our copy.

9 Q Yeah. So is it fair to say that there's an understanding on the fundraising
10 team that President Trump is driving his own fundraising emails and texts?

11 A I'm not sure. I mean, I think we've never seen online fundraising like we
12 have under that candidate. So I do think a large part of that was who he is and how he
13 speaks.

14 Q So, I guess, back to my question then, is it -- it seems like the answer is yes,
15 that there's an understanding that, like, what makes the magic sauce, to some degree, is
16 President Trump in the fundraising emails.

17 A I mean, I would like to think we were good at our jobs too. But, yes, I do
18 think he -- his voice was different. It made it, I guess you could say, easier because he
19 was so out there vocally. We didn't have to, like, make up all these emails. He was
20 providing us with a lot of content online.

21 Q Now let's talk a bit about what made for effective marketing, kind of, tactics
22 with emails. You mentioned urgency, the "match" or "impact" language.

23 Is there a reason why we see sometimes "match" versus "impact"?

24 A We were using "match" for a very long time. A lot of committees use
25 "match." At some point we did switch to "impact." It would've been some sort of edit

1 we received from, I believe, probably the legal team, that they asked us to switch.

2 Mr. Steggerda. And just to be clear, we're not -- she's not intending to waive any
3 privilege with respect to legal advice within her capacity as employee of the RNC.

4 [REDACTED]

5 Q Now let's talk about how you monitored the effectiveness of these emails.
6 Tell us a bit about how you knew whether an email was successful or not.

7 A At some point, we got an online reporting platform, called Datorama, that
8 housed the metrics we would need to know if something performed strong.

9 Q And that's Datorama with Salesforce. Is that right?

10 A From my understanding, yes.

11 Q Yeah. So tell us about the kind of metrics that Datorama provided.

12 A I mean, it had, you know, the date that it was sent, the amount it raised, ROI.
13 I mean, I mostly paid attention to raised. But, you know, like, click rate, open rate, those
14 types of metrics would've been there.

15 Q And what would you do with that information?

16 A I mean, you know, we had fundraising goals. So, based on how something
17 performed, maybe we would put it back on the schedule and send it again.

18 Q Okay. So if you see a fundraising -- is it fair to say that part of the process
19 was, if an email performed well, you'd try to recreate that magic again with future emails
20 so those could also similarly perform well?

21 A Yeah, I think that's fair to say. You want to -- I mean, why wouldn't you,
22 you know?

23 Q Yeah. No, it makes perfect sense.

24 Mr. Steggerda. When you say "magic," was pun intended?

25 [REDACTED] I don't know -- I wish it was intended. It was not. But

1 we can go back and edit the record and say it was intended.

2 [REDACTED]

3 Q So you're looking at open rates, click rates.

4 And when you're creating the email, like, what are you trying to replicate? Are
5 you replicating, like, the "match," "impact"? If it's a surrogate, are you looking to
6 replicate that surrogate? If it's specific language or topic, do you recreate that topic and
7 language as well?

8 A Well, just to back up, I'm personally not really looking at open and click rate
9 at this time, at --

10 Q Okay.

11 A -- that point in my job. I was mostly paying attention to amount raised.

12 But, yeah. And, also, you can actually just resend the exact same email. Like,
13 sometimes we didn't need -- if it was still very relevant, we didn't need to change it at all.
14 We could just resend it the exact same.

15 Q And is it fair to say that, if you see an email -- let's talk about, like, late 2020.
16 If you see an email that is replicated --

17 A Like, it's the exact same?

18 Q Yeah, exact same -- I mean, we won't say exact. We'll say, to the naked eye
19 it looks exactly the same.

20 A Okay.

21 Q Is it fair to say that that's done because it was an effective email?

22 A I would say, yeah, if you -- I mean, if you see an email more than once -- and
23 I would say that for just about any fundraising committee. If you see it more than once,
24 I would assume that, yes, it is being resent because it performed well the first time.

25 Q Uh-huh.

1 Mr. Steggerda. Do you feel like it was somewhat common where people working
2 for you would just take an older email and just tweak it?

3 Like, in other words, we're lawyers; we always, like, start from some draft, and if
4 we can reuse something and do it --

5 Ms. Allred. Uh-huh.

6 Mr. Steggerda. Like, was it a lot of that? Or were they literally starting every
7 single email with a blank page and, you know, "The radical left" or, you know, whatever?
8 Were they doing a lot of just pulling old stuff and doing it, or not? Or how common was
9 that?

10 Ms. Allred. Yeah, it was very common to take an old email, switch out what was
11 no longer relevant, or if a good line was tweeted, we could, you know, insert that, or
12 maybe we would change out the graphics. But typically we were working off old emails
13 as templates.

14

15 Q And is it fair to say that what would guide the use of those emails would be,
16 at times, the data, because you want to know what's effective? You're not pulling out a
17 dud to put back out again. Is that fair?

18 A Right. Yeah, if something performed really, really terribly, I probably would
19 not recommend to the team to, "Hey, let's do that one again."

20 Q Yeah.

21 Mr. Steggerda. But for every email that went out -- and I think Tem's team has
22 said there were 600-and-something in the post-election period --

23 Ms. Allred. Uh-huh.

24 Mr. Steggerda. -- is it the case that every single one of those emails, it would've
25 been based on some judgment by you looking at returns or anything like that? I'm

1 trying to get a sense of, like, the frequency that he's mentioning, your analysis of data.

2 Like --

3 Ms. Allred. Like, post-election?

4 Mr. Steggerda. Yeah. Was that, like, every email, or was it not? I mean --

5 Ms. Allred. I mean, the post-election period, I wasn't looking at results as
6 closely, if that's what you mean.

7 Mr. Steggerda. I'm just trying to get a sense of the commonality of that as the
8 basis for deciding what emails to initiate.

9 Ms. Allred. Yeah. I would say -- I mean, on the fundraising team, my, you
10 know, main -- I mean, our drive was to hit our fundraising goals. So, yes, we would use
11 old emails that performed well.

12 [REDACTED]

13 Q Uh-huh. So, leading up to the election, you relied on the Datorama data.
14 Is that fair?

15 A Yes, we would look at reports regularly.

16 Q And when you say "we," who is "we"?

17 A Oh. I mean, I looked at them a lot. Austin looked at them a lot. I mean,
18 like we said, he pretty much led the fundraising team. I don't know if anyone on my
19 team really looked at it. Honestly, if you've never read a report, it's a bit confusing.
20 Obviously, the data team.

21 Q Yeah.

22 A I'm not sure -- I mean, I believe everyone had access to it. I'm not sure
23 really who used it.

24 Q So let's talk about -- so you're looking at that, and you said you were focused
25 on amount raised, but you could also see open rates, click rates, delivered rates. Is that

1 all fair?

2 Mr. Steggerda. If you remember exactly --

3 Ms. Allred. I don't know if deliver- --

4 Mr. Steggerda. -- what you could see.

5 Ms. Allred. I don't know if deliverability rates were on there. There was a way
6 to get those. I don't know if they were on Datorama.

7 [REDACTED]

8 Q Okay. So what were other things you saw? Open rates, click rates.

9 Anything else you recall?

10 A ROI would've been on there.

11 Q And explain what that is.

12 A That's return on investment. So, obviously, the amount we spent sending
13 an email, we would want to raise more than we spent.

14 Q Uh-huh.

15 And, then, post-election -- and we'll talk a little more about post-election,
16 but -- how did that change, your reliance on this data?

17 A I don't particularly remember looking at it a lot. I don't remember having a
18 fundraising goal, post-election. I mean, that was, like, very uncharted territory. Like, I
19 wasn't anticipating working, like, doing fundraising in that capacity for that long. I don't
20 remember really looking at it.

21 Q Uh-huh. Do you remember Austin talking about that data with you?

22 A I mean, I remember, you know, we'd have conversations like, oh, like, we
23 raised, X amount today. But I don't remember conversations about specific emails.

24 Q Yeah. But to get that X raised, is it fair to say that one would look at the
25 Datorama reports to -- that's the natural place to go pull that information?

1 A You could look at that, or -- I mean, you could look at WinRed, theoretically,
2 you know, if you wanted to see how much you raised. I don't -- I would assume
3 someone would be looking at Datorama.

4 Q Yeah.

5 Would you all have, like, meetings where you discussed this data together?

6 A I don't remember having meetings post-election on this.

7 Q Okay. But, pre-election, you would have meetings where you discussed the
8 Salesforce-provided data?

9 A Yes. We had a weekly fundraising team meeting where we'd go over
10 reports and how things were performing.

11 Q Okay. Okay. And the reports you're talking about are these
12 Salesforce-created reports?

13 A I was not in charge of presenting a report --

14 Q Okay.

15 A -- so I can't for sure say where people got this information. Datorama
16 seems like the easiest source to get that information.

17 Q Yeah.

18 Mr. Steggerda. Are you talking about before the election or after?

19 Ms. Allred. This is before the election.

20 Mr. Steggerda. Do you remember those types of meetings after the election?

21 Ms. Allred. No.

22 [REDACTED]

23 Q And who led these meetings?

24 A Austin would've led the meetings.

25 Q Okay. And he would've provided the data that you're talking about?

1 A Well, each -- there were -- different people were presenting different
2 reports.

3 Q Okay.

4 A I don't think Austin presented any reporting.

5 Q So, looking at pre-election, is it fair to say that the Salesforce information
6 was an important tool in understanding the effectiveness of the fundraising efforts?

7 A Yeah. I'm not sure when we started looking at having Datorama provided
8 for us. It wasn't there the entire time I was an employee. But it was an important tool
9 for me, definitely.

10 Q Okay. When do you recall Datorama reports coming into your orbit?

11 A It was at some point in 2020, from what I remember. Before that, I really
12 wasn't involved in looking at the reports, so I'm not sure.

13 Mr. Steggerda. Did you say that you knew that they were Datorama reports? I
14 thought you just said you weren't exactly sure of the source of them.

15 [REDACTED] No, no. I think --

16 Mr. Steggerda. What's the -- what's the answer?

17 [REDACTED] I think we're conflating two different things.

18 Mr. Steggerda. Okay.

19 [REDACTED] She said she wasn't sure about the source of when Austin,
20 in these weekly meetings, provided data. So she wasn't representing that he was
21 presenting Datorama reports --

22 Mr. Steggerda. Right.

23 [REDACTED] -- but that, presumably, that's where the information
24 would be pulled from. And now she's talking about her use of the tool.

25 Mr. Steggerda. Oh, okay.

1

2 Q Is that fair?

3 A Right. So the team was presenting reports I assume from Datorama; I'm
4 not sure. I relied on Datorama, but it wasn't there -- we did not have access to
5 Datorama the entire time I was at the RNC.

6 Q But you had access in 2020.

7 A At some point in 2020.

8 Q Okay. Is it fair to say from July forward in 2020, the summer forward?

9 A I cannot be sure, but I would think by July we had it. I'm not for certain,
10 though.

11 Q Okay. But it's fair to say that, once Datorama became available to you,
12 whenever that was in 2020, you used it, and you said it was an important tool for you?
13 Like, that's something that you used?

14 A Yes. I probably looked at it daily.

15 Q Okay.

16 Is there anything else we haven't talked about that you used this for? We've
17 talked about the fundraising amounts, ROI, open rates, click rates. Any other data point
18 that this information provided that we haven't talked about?

19 A I mean, that is the only service it provided for me. If people used it for
20 anything else, I'm not sure.

21 Q Yeah.

22 Let's talk a bit about performance metrics -- excuse me -- testing.

23 A Uh-huh.

24 Q What role did testing and optimization of emails, kind of, serve for you?
25 Let's do pre-election and post-election.

1 A Pre-election, I mean, we were learning a lot. You know, like, trying to
2 figure out, like, is this going to get a higher, I guess, click rate or, like, a higher conversion
3 rate? You could do that just by testing, like, graphics. Maybe you were doing a
4 colored graphic versus a black-and-white graphic. Sometimes they were as simple as
5 that.

6 And, then, post-election, I don't remember doing any testing.

7 Q Okay. And is that because you were just working at a kind of crazy time?
8 Or why not?

9 A I mean, I remember, at the end of November, post-election, when a lot of
10 people were getting let go, our testing manager got let go at that point. So I don't
11 know -- I mean, I can't say that's why we weren't running tests, but we didn't have a
12 testing manager.

13 Q Now, when you say -- and who was that testing manager that got let go?

14 A Tom Toomey.

15 Q And do you know why he was let go?

16 A I don't think it was anything specific. I mean, a lot of people were getting
17 let go.

18 Q So let's talk about pre-election testing.

19 A Uh-huh.

20 Q What kind of things -- tell us more about what would be tested.

21 A Again, the graphics example I gave. I mean, we were testing different
22 colored buttons.

23 Q And the goal being to see what was effective in increasing the fundraising
24 haul. Is that fair?

25 A Yeah. I mean, the ultimate goal was to increase the amount raised.

1 Q Would you ever do any kind of testing as to the language of emails?

2 A I believe we ran some tests on different language.

3 Q What are some examples of different language that you would run?

4 Mr. Steggerda. Do you remember any specific examples?

5 Ms. Allred. I mean, one example I can think of -- and I don't know if this is what
6 you're looking for, but it does involve copy, I guess. Maybe we would ask someone to
7 contribute \$45, verse, "Hey, can you contribute any amount?" --

8 [REDACTED] Okay.

9 Ms. Allred. -- see what they're more comfortable doing.

10 [REDACTED]

11 Q Okay. How about phrasing?

12 A Phrasing?

13 Q So, at times, we see in emails repeated phrasings. I think even Todd --

14 Mr. Steggerda. "The radical left"?

15 [REDACTED]

16 Q So, when you see repeated phrasing that shows up in multiple emails, is that
17 a product -- I assume some of that is going to be a product of, simply, there are
18 phrases with any political base that are going to resonate more, for a variety of reasons.

19 Was there any of that based on testing as well, where you saw, like, certain things
20 that really resonated and there was data to back that up?

21 A Nothing that I remember. Phrases like "the radical left," that was being
22 used since before I started, so --

23 Q Yeah.

24 A -- if there was testing on that to prove that it worked, I wouldn't have been
25 aware of it. I don't remember any, like, specific phrasing that we would've tested.

1 Q Okay.

2 So what about any, I'm going to use the term, "natural language"? So not even,
3 like, phrases maybe, but just anything about language where it helped you get insight
4 into, here's how to speak or not speak, phrasing to use or not use? Anything about that
5 that you tested or that you're aware of?

6 Mr. Steggerda. Just if you remember certain examples.

7 Ms. Allred. Right.

8 BY [REDACTED]

9 Q Where you remember examples or where you remember it happening even
10 if you don't remember examples.

11 A I don't remember any examples -- well, I don't know if this counts. One
12 time, when we had to switch to the "impact" language instead of "match," we tried other
13 words instead of "impact," like "bonus." We tested that. Obviously "impact" won.

14 But in terms of what you're looking for on certain language being used, I can't
15 remember if we ran any tests on it.

1

2 [12:04 p.m.]

3 [REDACTED] How about using all capital letters, is that something
4 that --

5 Mr. Steggerda. I would just say for the benefit of the record, we're talking about
6 pre-election testing.

7 [REDACTED] Yeah.

8 Mr. Steggerda. She's here voluntarily. She's cooperating. I know that the
9 DNC uses basic testing. We talked about that before. And she doesn't remember
10 specific examples anyway.

11 I think to the extent that you're going to get in too deep into her former
12 employer's -- anything that gets kind of deeper than that into kind of proprietary how
13 they raise money, I just -- I want to protect my individual witness here and make sure
14 she's not --

15 [REDACTED] I would say --

16 Mr. Steggerda. -- unduly disclosing how they make money.

17 BY [REDACTED]

18 Q I'm not in politics, but I feel confident that there's nothing I'm asking you
19 that is -- if it were that simple, the question I'm asking you, then they wouldn't hire
20 people like you to do the job.

21 So what I'm getting at is not about how the RNC raises money. I'm trying to
22 understand what people can even test, right?

23 A Right.

24 Q I'm trying to get a sense of, are these things that are within the scope, is that
25 a thing that you can really differentiate whether something matters or not?

1 A Right.

2 Q Right. So is that, for example, is that all caps letter, is that the kind of thing
3 that testing -- people can test, or that's too granular?

4 A I mean, obviously, you can test anything. But I, like you said, I think testing,
5 like, sometimes in all caps versus not all caps, I don't think that would really yield any
6 results.

7 Q Yeah.

8 A All caps have been used since before I got there. I imagine it's because
9 President Trump tweets in all caps very frequently.

10 Q Yeah, yeah. And if you wanted testing -- just to be clear -- if anyone
11 wanted testing, they would go to the testing manager and request a test, or did individual
12 folks, you or Austin, have the ability to run tests on your own?

13 A I mean, there might be. One of my responsibilities was requesting graphics
14 to be used in our emails. So I might on my own decide I want to test this graphic versus
15 this graphic. I did not need approval from our testing manager on it. However, he
16 would be in charge really of explaining the results more in depth.

17 Q Yeah.

18 A Like, I might initiate this specific graphics test, but he would really figure out,
19 based on the results, how it should go.

20 Q Okay. Did you do any testing regarding -- pre-election -- about the election
21 fraud messaging, anything related to that messaging? Did you or are you aware of
22 anyone else doing any testing related to that subject matter, election fraud, kind of
23 election malfeasance-related language?

24 A There were some election, like, ahead of the election, like, I don't know if
25 election fraud was used specifically, but I know that messaging had been used before the

1 election. I do not remember testing it.

2 Q Do you remember whether the election fraud messaging was successful
3 pre-election?

4 A I don't remember. I don't believe we used it very frequently.

5 Q Let's talk about the approval process.

6 A Okay.

7 Q So you go down the chain, it gets to the approval folks. Is it fair to say that
8 there are RNC people in the approval chain, let's call it, and folks from the Trump
9 campaign?

10 A That's -- yes, I believe that's correct.

11 Q Right. And those individuals were from, generally speaking, the
12 communications department, the research department, and the legal department?

13 A Yes, that sounds correct.

14 Q And when those folks weighed in, they would -- were you -- when they
15 responded, would you see who was responding?

16 A I was cc'd on the emails, so, yes, I could see who would respond.

17 Q All right. So is it fair to say from mid-2020 through January 6th you
18 would've been copied on the approval -- on these approval chains giving comments on
19 emails and text messages?

20 A I should have been on all approval chains. I don't know if I was ever left off.
21 And, yes, I would have been on them. Of course, every now and then someone doesn't
22 "reply all."

23 Q Yeah. Fair.

24 Q So let's talk about who was -- and I understand that these chains had a lot of
25 people on them. So what I want to focus on are the folks who were actually big

1 responders, like, folks who would actively be engaged typically and not just everyone who
2 was copied --

3 Mr. Steggerda. Yeah.

4 [REDACTED] -- and just to be on the email.

5 Mr. Steggerda. And maybe one foundation question to help.

6 Within the comms, research, legal, what awareness did you have in terms of how
7 those individual organizations worked in terms of who specifically would be the person --

8 Ms. Allred. Right.

9 Mr. Steggerda. -- that would be the one who had to check it off or did it rotate?

10 Or anything you can tell him about your understanding of that, I think, would be helpful.

11 Ms. Allred. Yeah. From what I remember, it was just one or two people from
12 each department on the approval chain. The same person, unless they were out or
13 something, would normally give sign-off.

14 BY [REDACTED]

15 Q Okay. So who were those people? And I need you to specify what
16 department and what entity.

17 A Do you want just the people who would respond or just everyone cc'd on the
18 email.

19 Q Well, let's start first with the people who were actively engaged.

20 A Okay.

21 Q So we can go through each. And then if you know other people who were
22 on the chain and weren't actively engaged but were on it typically, understanding that
23 we're talking generally and not every single email ever, let's just categorize those two so
24 we can be clear on what you're saying.

25 A Okay. I don't remember everyone's name that would respond. I know

1 from the Trump campaign, I remember Zach Parkinson was someone who responded. I
2 was never sure if he was from research or comms, or maybe he did both, I'm not entirely
3 sure, but he would typically, if something was wrong, like, inaccurate, he would flag it.

4 From the RNC, someone from the legal team. I believe her name was Jenna. I
5 cannot remember her last name. Not the Jenna that you see on the news every now
6 and then but a different Jenna.

7 And those are really the only people I remember responding.

8 Mr. Steggerda. Do you remember any comms or research names that spoke for
9 those departments?

10 Ms. Allred. Not from the RNC, I don't remember.

11 BY [REDACTED]

12 Q So from the RNC, you remember Jenna from legal. You don't remember
13 comms or research from the RNC.

14 A I don't remember their names.

15 Q Does the name Mike Reed sound familiar, like someone who was on these
16 emails?

17 A The name sounds familiar. I don't remember if he was on the emails.

18 Q Okay. And then do you remember -- so let's go the Trump side. You said
19 Zach Parkinson for research-slash-comms area.

20 A Something like that.

21 Q Who else on the Trump side?

22 A I believe Brad Parscale. I don't know if he was actually on the Trump
23 campaign, paid by them, but I believe he was on the email.

24 I want to say at some point Bill Stepien was added, but I cannot remember for
25 sure, and I don't know if it was maybe just sometimes, not every time.

1 Q Okay.

2 A If a Lara Trump email was included, I believe her assistant was cc'd. I don't
3 think she was.

4 Q Was that common for any other surrogates, where a representative would
5 be copied?

6 A So for Donald Trump Jr., I believe his -- I don't think it's, like, his assistant.
7 Someone for him, a representative, was cc'd. His name is Andrew Surabian.

8 Q Okay. And for Lara Trump, do you remember the person who was --

9 A No, I don't remember her name.

10 Q All right.

11 A For the other surrogates, meaning, like, Eric Trump or Newt Gingrich, just
12 people like that, they would get approval separately. I mean, they would -- the way it
13 worked was, if it was an Eric Trump email, it would go through approvals with someone
14 on Eric's team. And then once it was approved by Eric and his team, it would go through
15 our normal approval process. But I wasn't --

16 Q Okay. So it became pre-approved?

17 A Yes. And I was not on the surrogate approvals.

18 Mr. Steggerda. So you're thinking that you had to have surrogate sign-off when
19 you used a surrogate?

20 Ms. Allred. Yes. The only person that we did not get their actual sign-off
21 would've been the President.

22 [REDACTED] Okay. The President's emails just went through the
23 approval process?

24 Mr. Steggerda. The campaign.

25 Mr. Allred. Yes.

1 Mr. Steggerda. You still got the campaign approval, right?

2 Ms. Allred. Yes.

3 BY [REDACTED] :

4 Q Do you remember anyone else from the campaign? Was the name Alex
5 Cannon?

6 A Yes, I do remember Alex. I don't know if he was on the email, but I know
7 his name.

8 Q Okay. Do you know his name through your -- like, would he weigh in on
9 fundraising emails in any capacity?

10 A I mean, knowing what I know now, I know, like, I know him separately now
11 that I'm not doing that. I know now that he, like, is a lawyer, I believe, so he probably
12 would've been there in some legal capacity. I don't remember him weighing in.

13 Q Okay. Do you have a memory of him being on emails from when you were
14 on the campaign, not knowledge of now?

15 A I don't remember.

16 Q Okay. Anyone else did you recall -- and again let's focus, like, we're going
17 to talk about, I want to do July forward, and then we'll clarify post-election.

18 What about Jason Miller?

19 A I remember Jason Miller. I can't -- I don't know for sure if he was on the
20 email.

21 Q Okay. You remember him, who that is, but you don't know whether he was
22 on the approval emails?

23 A Right.

24 Q Okay. What --

25 Mr. Steggerda. Tem, can we just clarify one thing, if I might?

1 [REDACTED] Yeah.

2 Mr. Steggerda. I hate to intrude on this one.

3 But the reference -- I just want to make sure her testimony's clear. The
4 reference to the approval emails, is it -- am I right in thinking that it's the -- there's a
5 broader email list that includes people that don't -- you didn't need sign-off from them.
6 But in terms of the core sign-off, those were -- you needed three-department sign-off? I
7 don't mean you, but, like --

8 Mr. Allred. Right.

9 Mr. Steggerda. -- whoever on your -- the broader team was getting approvals.
10 We keep referring to the approval email, but I want to be careful. If there's 50 people
11 on that email or there's 20 --

12 Mr. Allred. Right.

13 Mr. Steggerda. -- did you need sign-off from all of them on? Were they
14 really --

15 Mr. Allred. No.

16 Mr. Steggerda. -- part of the approval process? Or walk me through what you
17 remember about the broader emails.

18 Ms. Allred. Right.

19 Mr. Steggerda. Regardless of what it's called, what was the --

20 Ms. Allred. Right. So there were many people on the approval email. We did
21 not need every single person's sign-off. We needed specific people's sign-off. I'm not
22 sure what the other people were on there for, maybe just for awareness. But they were
23 always there. Not every single person had to respond.

24 BY [REDACTED]

25 Q Yeah. So let's do this. Let's get to the list of people you recall on the

1 email chain, and then we'll talk about who actually responded.

2 A Okay.

3 Q All right. So we have -- we'll put Alex Cannon and Jason Miller to the side
4 because you know who they are but don't recall them being on the chains.

5 A Okay.

6 Q You said Zach Parkinson and likely Parscale and Stepien at some points.
7 Anyone else from the Trump campaign you recall?

8 A No, I don't remember anyone else.

9 Q How about Tim Murtaugh?

10 A Again, I know who he is. I cannot remember if he was on the email.

11 Q How about Justin Clark?

12 A Same. I know who he is. I don't remember him being on the email.

13 Q Okay. Now, as far as individuals that needed sign-off, am I correct that
14 Zach Parkinson was one of those?

15 A Yes. He responded every time from what I remember.

16 Q Okay. Anyone else that you recall was a sign-off-needed person?

17 A From the Trump campaign?

18 Q Trump campaign or the RNC.

19 A Like I said, Jenna from RNC legal, she typically responded -- or she should've
20 always responded. Someone did. There were -- there was someone from RNC
21 communications that would sign off. I can't remember who.

22 Q Okay. So the only person you remember signing off would be Jenna from
23 RNC legal as an individual that you know by name?

24 A Yes.

25 Q As far as just being on the email chain, would Austin also be on as well?

1 A Yes, Austin, and I believe Kevin were both on the emails.

2 Q Okay. What about Richard Walters?

3 A I have no idea if Richard was on the emails. I mean, I know who he is, but --

4 Q All right. And post-election, did this remain true, what you just told us, so
5 meaning that Zach Parkinson was still the person who signed off, and then Jenna signed
6 off? And then, of course, folks from those respective groups --

7 A Right.

8 Q -- but the names you remember, it's Jenna and Zach post-election as well?

9 A I remember it changing after, post-election, not because our protocols were
10 changing, but people were leaving. I mean, at some point those people weren't -- that
11 we were getting sign-off for, they weren't there anymore. I don't remember -- I mean,
12 someone would've replaced them, but I don't remember who it would've been.

13 Q And when you say those people leaving, are you saying you remember Zach
14 Parkinson leaving?

15 A I don't remember who left. But I do remember certain people that we
16 got -- I just remember thinking, like, oh, wow, this person left, I wonder who's going to
17 approve for them, you know.

18 Q Okay. Got it.

19 Okay. Just real quick. When we look at fundraising emails and we see, like,
20 disclaimer language, or we see it's sent on behalf of this, this, and this entity, is it fair to
21 say that that's drafted by lawyers and not the fundraising team? Is that accurate or --

22 A So our -- the bottom of our email disclaimer, I mean, it's pretty long.

23 Q Yeah.

24 A It has, like, pictures and, like, a video. Any legal language, from what -- has
25 been there as long as I've been there. I assume it would've come from a lawyer.

1 Q Yeah.

2 A But, like, I know there's language that's, like, text "Trump" to 88022, like,
3 that's something we would've added.

4 Q Okay. How about where the money was going? If the money was
5 being -- is that something that you were aware of when you were drafting emails, like,
6 how the money was being split up or allocated, that came in?

7 A No, I don't know how it was split.

8 Q Okay. So any fundraising, the content of a fundraising email was, in a
9 sense, separated, from your vantage point, from where the money would be allocated?

10 A For the most part. I mean, there were times I would know, like, this is an
11 only RNC email. But outside of that, I wouldn't know.

12 Q Okay. Are you familiar with the -- oh, just on that point, just to make sure
13 I'm being clear, the description, like, if someone donated and explained, like, when I say
14 the proceeds, even the part that says, like, 75 percent goes to this person, and after that
15 first \$5,000, then this happens --

16 A Right.

17 Q -- and after that, then this happens, all that stuff, was that something that
18 you were involved in putting in the emails or drafting or otherwise weighed in on?

19 A No. I think that would've been on WinRed where it tells you the allocation,
20 but I did not make WinRed pages, so, no, I wouldn't know.

21 Q Okay. Were you involved at all -- are you familiar with the Trump app, the
22 app that was around?

23 A The app -- yes, I'm familiar with the app.

24 Q Okay. Did you have any involvement in drafting messages for that app?

25 A I think -- I can't be sure. It's possible when it first started we helped with,

1 like, the push notifications. I don't remember writing anything though.

2 Q Do you remember, post-election, dealing with anything to do with the app?

3 A No, I don't.

4 Q Okay. Do you know who was involved in drafting messages for the app or
5 otherwise involved with the app?

6 A I know someone on the text message team would've helped out with the
7 push notifications, but I'm not sure who it would've been.

8 Q Do you know who would've helped out with drafting the copy?

9 A That was on the app?

10 Q Yeah.

11 A No, I have no idea.

12 Q All right. So we've moved forward, July, we rushed forward to election day,
13 election day happens, no one gets any sleep.

14 Right before election day, do you prepare any copy in anticipation of different
15 potential results that could happen?

16 A I don't remember preparing any copy.

17 Q Do you remember having any meetings with anyone about post-election
18 activity from the fundraising perspective, but happening either election day or earlier?

19 A I remember having a conversation with Austin. I don't know if it was the
20 day of the election or what. But I'm feeling confident in our efforts, and I'm thinking
21 we're definitely going to win.

22 And I said, "Hey, should we get like a -- like, what do we do if we win? Like, do
23 we send an email? What's going on?"

24 And he's like, "Oh, I don't know. Let's just see what happens."

25 But we didn't do anything further.

1 Q Did he seem less confident than you?

2 A I mean, I'm sure you've met him. He's hard to read. He's pretty calm at
3 all times. So, I mean, he wasn't ever, like, super excited or super angry, so it's hard to
4 tell.

5 Q Even keel.

6 Any discussions pre-election about post-election fundraising? So election day or
7 earlier, any discussions about post-election fundraising?

8 A The only discussions we would've had is if something was going to a runoff,
9 like, if a congressional or Senate race was going to a runoff, the RNC obviously would be
10 involved.

11 Q So do you recall having those discussions?

12 A I don't remember having those discussions.

13 Q And when you say that's the only thing you would discuss, why do you think
14 that's the only thing you would've discussed?

15 A Because I don't think -- I mean, I'm sure we all thought there was going to be
16 a winner on election night. So, yeah, I mean, it just didn't occur to me that we would
17 have continued fundraising. Like, I didn't think that the election would go on for as long
18 as it did.

19 Q Yeah. Now, before election day there were discussions that there might
20 not be a winner on election -- here's my recollection. That there were discussions in the
21 media that there might not be a winner election night because of the increased reliance
22 on mail-in ballots and that it might take a time to count these.

23 Do you recall those discussions?

24 A I vaguely remember them saying that a winner might not be called.

25 Q Did you have any discussions about how that would impact, like, that lag

1 might impact fundraising, or otherwise after the election whether you would engage in
2 fundraising then?

3 A No, I don't remember.

4 Q All right. So election day happens. We get to November 4th, the next
5 day. Tell us a bit about when you first became aware that fundraising would continue.

6 A I mean, we were at the office pretty late on election night, like, going into
7 the 4th. So we were drafting emails already because we could see that the results were
8 not going to be called.

9 Q And you were drafting emails to go out the next day?

10 A I think we were sending, like, all night.

11 Q Okay.

12 A From what I remember.

13 Q All right. So when is the decision to start writing those emails, like, where
14 did that come from?

15 A It probably would've come from Austin when certain. I don't quite
16 remember how it was going on with the news, but I think they were saying, like, so and so
17 State is not going to be called tonight. So, I mean, what most likely would've happened
18 is him saying, "Hey, this race or this State is not going to be called, like, let's get an email
19 on it."

20 Q Okay. So the decision, is it accurate to say that the decision to continue
21 fundraising, from your vantage point, came from Austin?

22 A I'm receiving direction from Austin. I don't think he made the decision to
23 continue fundraising.

24 Q And why don't you think he made it?

25 A I mean, while he was in charge of the fundraising team, I mean, he wasn't,

1 like, a senior person on the campaign staff. I don't think that was his call to make.

2 Q Did you have any indication from Austin that he had spoken to other
3 individuals about continuing fundraising?

4 A Which day are we talking about?

5 Q This would be election day.

6 A Election day? Oh. No.

7 Q Okay. So election night, you're saying you were sending emails, like, in the
8 middle of the morning, like, 1 a.m., 2 a.m.? And is that sending or drafting them to be
9 sent, like, the next day? Were you actively, like, let's draft and get this out, like, while
10 we're still at the office?

11 A Me and my team were drafting pretty late that night, but emails were
12 actively going -- being sent from the email team all night.

13 Mr. Steggerda. There's a lag, right, is what you're saying? You're drafting, but
14 isn't --

15 Ms. Allred. Right. I mean --

16 Mr. Steggerda. The stuff that's going out that night isn't drafted instantaneously,
17 right?

18 Ms. Allred. Right. I mean, it was --

19 Mr. Steggerda. I mean, explain that a little bit just so you can clearer to his
20 question.

21 Mr. Allred. Right. Probably if I'm drafting late at night or early in the morning it
22 would've gone for a very early morning approval to go out the next day.

23 I remember very late on election night when, like I said, when things didn't look
24 like they were going to be called, we did draft some emails, and I'm pretty sure we sent,
25 like, through an approval chain very late at night, so we could send them throughout the

1 early morning.

2 BY [REDACTED]:

3 Q And as far as how long it took to get through the approval chain, tell us, like,
4 what was the, in a normal -- to the extent you have a normal election day, right -- middle
5 2020, like, what does an approval chain process look like then timewise, versus
6 November 3rd, someone says, "Things aren't going well, let's get some emails out"?

7 A On an average day in mid-2020, our volume wasn't quite as high. So, I
8 mean, we might give them -- ask for approvals back within 24 hours or something.

9 The closer we get to election day, the faster we're moving. At some points we
10 were sending two or three approval chains a day. Like, we wouldn't -- like, we'd send
11 one at 8 a.m., we'd get it back by noon. We'd send one at 1, get it back by 5. I mean,
12 that's just on average.

13 On election day, because we are moving so quickly, we probably asked them to
14 approve within an hour. And, I mean, we could not send it unless we got every single
15 person's sign-off that we needed.

16 Q Yeah. And then those sign-offs you're getting included Zach Parkinson?

17 A I can't say for sure he approved on election day, but, like, he should've if we
18 were following the same protocol.

19 Q And in general those approval chains are -- if I'm correct -- there are multiple
20 emails and sometimes a lot of texts can be -- several texts can be in one approval
21 submission.

22 A Yes.

23 Q Right? So it's not you write one email to win a dinner with the President
24 and send it off. It's, like, here's, like, a stock ready for review? Is that -- or does it -- is
25 it both ways?

1 A It's kind of both. Typically there are multiple emails, multiple texts. But if
2 something's, like, breaking news and we want to get out as soon as possible, we're going
3 to send that one through by itself.

4 Q Okay. So the emails, when Austin tells you to start writing the emails
5 election night-slash-morning, what's he telling you? What emails are those?

6 A We were doing victory emails for the States that had been called in
7 President Trump's favor. You know, like, we won Florida, big States like that.

8 We were also doing a lot of just what we call all-graphics email where there's
9 literally no copy, just a massive graphic, because they're quick.

10 Q When do the -- the emails regarding stolen election claims, was this part of
11 that tranche here?

12 A I want to say, from what I remember on election night, I don't think we were
13 using "stolen election" language because, like I said, when we went to bed, President
14 Trump was winning, so I don't think we saw a need for that language.

15 At some point we started using "protect the results," or something like that,
16 language, which I believe was early on.

17 Q When you say -- early on would be when?

18 A Oh, I'm thinking, like, late election night, early the next morning when States
19 are saying they're not going to have results to announce that night.

20 Q Okay. And the "protect the results," in my reading that's in the same family
21 as -- it's suggesting the results are under attack. Is that fair?

22 A I don't know if "attack" would be the right word, maybe -- I'm not sure. It
23 was just very -- I wanted to be --

24 Mr. Steggerda. Reasonable concerns about the results?

25 [REDACTED] Yeah. That the concerns about the -- that the results

1 could be compromised.

2 Ms. Allred. I suppose, I want to say, if we used that language, President Trump
3 was tweeting it, I'm not sure why we were using that language exactly.

1

2 BY [REDACTED]:

3 Q So I guess what I'm trying to -- because when we look at the emails,
4 right -- and we'll look at some -- November 4th, early, I mean, it's always tough to know
5 the timing because depending on the recipient's email server and whatnot, when they get
6 delivered, it's not always necessarily when you sent them.

7 But from some of the stuff we've seen, in the morning of November 4th, so
8 otherwise the late night of November 3rd, "Democrats are trying to steal the election"
9 are being blasted out. And you see that email multiple times.

10 November 4th, based on the timeline we're talking about, it seems like your team
11 is drafting, either in the middle of the night or first thing, 6 a.m., November 4th, to get to
12 the approval chain.

13 So where is that directive coming from?

14 A I mean, I think President Trump was very vocal that night that he thought
15 the results were going to be, like, compromised. So, I mean, I don't remember because
16 it was very late. If I had received direction, it would've come from Austin, saying, like,
17 "Hey, President Trump's tweeting, let's get some emails."

18 Q And when you say if you had received direction, would you have taken the
19 initiative to say, let's get some "Democrats are trying to steal the election" emails ready in
20 case Austin wants them?

21 A I don't remember. I don't think that's something I would've taken initiative
22 on.

23 Q Okay. So is it fair --

24 Mr. Steggerda. Did you create -- were you the origin of that phraseology that
25 [REDACTED] is mentioning --

1 Mr. Allred. No.

2 Mr. Steggerda. -- "Democrats are trying to steal the election"?

3 Ms. Allred. Not that I can remember.

4 Mr. Steggerda. Yeah.

5 BY [REDACTED] :

6 Q But I guess what I'm asking is that, it seems like you recall there was a -- I
7 think you said "protect the election," right?

8 A Uh-huh.

9 Q But I'll show you that it's "steal the election," right?

10 And is it fair to say that the decision to focus on that, the substance would've
11 come first from President Trump because that's what he's talking about? Is that fair?

12 A Yeah. He's talking about them, yes.

13 Q And the decision to start writing those emails while the election is not called
14 in the morning of November 4th, that directive would have come from Austin?

15 A From what I remember, yes. I was most likely taking direction from him
16 because I did not know which way we were going. I didn't know what we were
17 supposed to be going.

18 Q And there's no one else you would've taken direction from at that -- there's
19 no one else that we're not thinking about that would've given you direction on this thing,
20 right?

21 A No one I can think of.

22 Q All right.

23 So let's look at the first email, exhibit 1. And it's going to show up on here, Todd,
24 too, so --

25 Mr. Steggerda. I've seen it.

1 [REDACTED] Yeah. It's on --

2 Ms. Allred. Do you actually mind if I take a quick bathroom break before we --

3 Mr. Steggerda. Yeah, can we take 5?

4 [REDACTED] As we say in Congress now, we have to go into recess, is
5 how we say it here.

6 Mr. Steggerda. Okay.

7 [REDACTED] Yeah. All right. Good.

8 [Recess.]

9 [REDACTED] All right. And we're back on.

10 Okay. So we're looking at exhibit -- if we could have exhibit 1 on the screen,
11 please.

12 So here it's an email from November 4th, and it says, "WOW. We are WINNING
13 like no one thought possible right now. Despite the numbers that are very obviously in
14 favor of YOUR President, THE DEMOCRATS WILL TRY TO STEAL THIS ELECTION!"

15 So first we see the -- a big use of caps here. Is that part of you trying to capture
16 the President's voice?

17 Ms. Allred. Yeah, I would say so. Like I said, he uses caps a lot when he tweets.
18 It's very normal --

19 Mr. Steggerda. You can look at this one.

20 Mr. Allred. Oh.

21 Mr. Steggerda. They're just putting the identical one up on the screen.

22 Ms. Allred. Right. Sorry.

23 Mr. Steggerda. But you can look right there.

24 Mr. Allred. Yes, it's very normal to use all caps.

25 BY [REDACTED]:

1 Q Okay. And then so is it fair to say this is the kind of email that was being
2 drafted in the time frame you're talking about, like, in the middle of the night?

3 A You said this went out on the 4th?

4 Q It went out on the 4th.

5 A Obviously, I don't remember exactly when this was drafted. It's very
6 possible if it went out on the 4th that it was drafted late evening or early morning on the
7 3rd/4th.

8 Q Okay. So this theme, and exhibit 2 you can flip to, has again -- this is also
9 from the 4th -- and it says at the top, "BREAKING!" in all caps, "DEMOCRATS PLAN TO
10 STEAL THE ELECTION." And it says, "John, President Trump needs your help. You've
11 been there for him every step of the way these last few years." And it goes on and later
12 says, "It's no secret the Democrats will try to STEAL this Election."

13 So it appears in looking at the emails that it's not a one-off message. It's a
14 repeated message that's going out while the election is still undecided. And as you said,
15 you had no idea what was going to happen with the election.

16 So can you give us some insight into where is this messaging coming from? And
17 let me ask two questions.

18 A Sure.

19 Q Where is this messaging coming from substantively, like, is it pulling
20 President Trump's language? And two, who inside the campaign is giving the directive
21 to use this language?

22 A So your first question, where is it coming from, it would've been coming, you
23 know, it would've been coming from the President, whether he's tweeting it or, you
24 know, saying it in press conferences. It would've been coming from his legal team who
25 is also giving press conferences. It would've come from campaign, RNC statements. It

1 would've been on the news that, you know, all this was happening. I mean, there was a
2 lot to pull from.

3 And then in terms of -- you asked who was giving directives?

4 Q Yeah. So it's November 3rd, you watch, the results come in, you say you
5 don't know what's happening. Then in the middle -- you know, next morning, but late
6 that night you started drafting emails. We see these emails go out very early November
7 4th. Are these emails that Austin would've directed your team to put together?

8 A At this time and really the whole -- my whole job, I only really took direction
9 from Austin.

10 Q Yeah.

11 A Where he's getting his direction, I'm not sure.

12 Q Okay. So then was the decision to write these emails, did it -- was the
13 exception with you or from Austin?

14 A I don't remember the specific emails. I mean, I'm not sure who's idea it
15 would've been.

16 Q Is this the kind of email that you would've -- think you would've come up
17 with on your own and drafted in the middle of the night, November 4th?

18 A I mean, an average email, if I had come up with an idea to write one, it's
19 based off what would've been being tweeted online and being talked about. On this
20 particular day, I'm not sure who would've come up with it.

21 Q I guess, here's what I'm asking, is that the election -- I think you previously
22 said that you were unsure which way things were going, and you weren't sure, I think, the
23 fact of which way the campaign was going. Is that fair?

24 A I mean, this was probably on -- I mean, yeah, on November 3rd. I didn't
25 know what the results were going to be. I mean, this is my first Presidential. I have no

1 idea what you do the day after the election typically.

2 Q Yeah. So do you think you would've -- does it sound like something you
3 would've done, to say, "Hanna thinks that the campaign should write a 'Democrats are
4 trying to steal the election' email"?

5 A I would not have been the leader of that messaging. I mean, like I said, I
6 was taking direction from statements and tweets that were going out.

7 Q Well, just to be clear, I'm not asking you about where the actual drafter
8 would have pulled inspiration for the language.

9 A Right.

10 Q I'm asking about the decision to write "Democrats are trying to steal the
11 election" at this time period.

12 A That's not a decision I would've made.

13 Q So that decision would've come from Austin, correct? And when I say
14 decision, I don't mean the ultimate decision. I'm talking about from your vantage point,
15 the person who would've directed you and your team would've been Austin?

16 A I don't remember him ever telling me, "Use 'Democrats are stealing the
17 election' language."

18 Q Would anyone else have directed your team to draft an email like this
19 besides Austin?

20 A Not that I would be aware of.

21 Q When you say not that you would be aware of, isn't the answer just no?

22 A Well, I mean, yes. Theoretically, no one should be giving my team direction
23 except Austin.

24 Q Yeah.

25 A No one that I'm aware of was ever giving us direction except Austin.

1 Q Yeah. And then --

2 Mr. Steggerda. She's not aware of, like, Gary Coby going to Alex --

3 [REDACTED] Yeah.

4 Mr. Steggerda. -- or any of her people. She just doesn't remember that. But
5 she can't rule out that that didn't happen, I think, is the --

6 BY [REDACTED]:

7 Q Did you have conversations with Austin about this kind of messaging, about
8 "stolen election" messaging around this time?

9 A I don't remember conversations.

10 Q Did you have conversations with anyone regarding this kind of messaging?

11 A I don't remember any specific conversations. If anything, you know, we
12 were talking about what the President was talking about.

13 Q Yeah. So is it fair to say that -- and I don't mean the substance, but the
14 decision to continue fundraising on this -- to restart fundraising on this messaging, is it
15 fair to say that that's not a decision that you would've made?

16 A It would not be up to me if we stopped or started fundraising.

17 Q Yeah. And that the directive you would've gotten to start would
18 have -- you expect would've come from Austin?

19 A Yes. I reported to Austin, so I would've received direction from him.

20 Q And as far as the substance, it's fair to say that when we look at this
21 messaging, your team would've pulled the voice and the messaging and the themes from
22 President Trump's words?

23 A It could've been from President Trump's words. It could've been from
24 press conferences that him and his legal team were doing. Or it could've been from
25 statements from the RNC or the campaign. We were pulling from many sources.

1 Mr. Steggerda. Or other surrogates?

2 Ms. Allred. Yeah. If anyone on the family happened to tweet about --

3 Mr. Steggerda. Let me try to clear the record.

4 When you go in on the 4th, the next day, do you remember getting -- I think what

5 ██████████ trying to ask you -- do you remember getting specific direction on "We're going to

6 keep fundraising" and whether there was any direction on messaging? Do you

7 remember anything like that?

8 Mr. Allred. At one point, I don't know if it was the 4th or the 5th, Gary Coby had
9 a meeting with the whole digital team to let us know we were -- the election -- the results
10 were -- had not been called, we were going to continue working and fundraising.

11 BY ██████████ :

12 Q Okay. We're going to talk about that.

13 A Okay.

14 Q But I just want to be clear about that point, because you said where you
15 would pull the language from.

16 Exhibit 1 is an email from Donald J. Trump, right? You wouldn't look to other
17 surrogates to pull language from President Trump's -- an email that's sent from President
18 Trump, right? You would look to President Trump to pull the language. Is that fair?

19 A I don't remember looking at anyone else to -- any other surrogate to pull
20 language from President Trump. It's possible it could be pulled from campaign
21 statements or something similar. But I don't think I would use, like, something Lara
22 Trump said and say President Trump said it.

23 Q Because the point of having -- of writing an email from a certain surrogate is
24 to capture their voice and kind of their essence for the recipient, right?

25 A If you want it to feel authentic from that person.

1 Q Right. So when we read this email that says that the Democrats would try
2 to steal this election, in all caps, it's fair to infer that that was written because you wanted
3 to capture President Trump's voice and messaging on the topic?

4 A I mean, any email from President Trump, yes, you want it to feel like and
5 sound like it was coming from President Trump.

6 Q Let's talk about the all-hands meeting you're referencing. So you thought
7 that happened November 5th?

8 A I believe it would've either been Wednesday or Thursday.

9 Q Okay. So either the 4th or the 5th?

10 A Yes.

11 Q Okay. So tell us about that meeting.

12 A Gary -- I mean, Gary -- we typically had digital team meetings once a week
13 leading up to the election. I don't know when we started, but we did them, I want to
14 say, every Monday.

15 So sometime after the election, he, you know, gathers everyone. I don't
16 know -- most people were in person. I'm not sure if people Zoomed in for this meeting
17 or not. Typically that's what we did.

18 He just let us know, like, hey, the election's not over. They haven't called the
19 results. We're going to continue fundraising, like, legal action is being taken, and we
20 need to fundraise to pay for it.

21 Q Okay. Tell us about the incident with Ethan Katz in that meeting.

22 A What do you mean?

23 Q Did Ethan Katz ask questions?

24 A Oh, Ethan Katz.

25 Q Yes.

1 A Sorry. I didn't hear that.

2 I believe that was the meeting that, yes, he did ask 50 questions.

3 Q And what did he ask?

4 A I don't specifically remember. Someone else was giving a rundown on
5 something. I believe his name is Oz. I don't know if that's a nickname or his actual
6 name.

7 Q Is his first name, maybe, Matt? Does that sound right?

8 A I have no idea.

9 Q Okay.

10 A But everyone calls him Oz.

11 Mr. Steggerda. You sound like you guys have been engaged in investigative
12 activity.

13 Ms. Allred. You probably know more than me on his name. Everyone called
14 him Oz. I have no idea who he is or who he works for.

15 He was giving some rundown, something on data. I don't believe he did
16 fundraising data, so I don't know what the data was on. Basically saying, like, here's the
17 path to victory, is what I remember, like, here's how we win. I mean, being, like, there's
18 still, like, this many uncounted votes in this State and, like, if we -- you know, basically
19 how we can still pull it off.

20 And I remember Ethan asked Oz a question -- or Gary. I'm pretty sure it was Oz.
21 He got his answer. And then he continued, like, kind of peppering Oz or Gary with
22 questions. And it was very awkward for everyone in the meeting.

23 Q Is it fair to say that Ethan was challenging them?

24 A I mean, whatever he was asking, he clearly did not agree with what they
25 were saying.

1 Q Yeah. Because -- is it fair to say, because, you know, we've -- if someone
2 were to say that Ethan was challenging their indication that the campaign should stop
3 counting elsewhere in some States, but keep counting votes in other States, and being a
4 proponent of that, and he was challenging the logic of that, does that fit with your
5 recollection?

6 A I do not remember what Ethan was upset about. I can't remember if he
7 was thinking we should do more or thinking we should be doing less. I just remember
8 being very embarrassed and blocking it out of my mind.

9 Q So you're saying -- wait -- you don't recall whether Ethan was, in a
10 sense -- when you said we should do more or less, what do you mean by that?

11 A Like, I wasn't sure if he was thinking there was more to be done and we
12 weren't doing it, or if, like, hey -- I don't know if he thought this is a lost cause, what are
13 we doing. I have no idea how he felt on it.

14 Q Okay. Did you talk to Ethan about it after the fact?

15 A I talked to Austin about it after. I don't remember talking to Ethan on it,
16 because I just didn't see the point.

17 Q Okay. Look at exhibit 3.

18 So what are we looking at here?

19 A Oh, sorry. Am I on the right one?

20 Q Yeah.

21 A Oh, yeah, yeah. Okay.

22 This would've been Karla Howard. She was not on my team. She was on the
23 political -- digital political team, but as a copywriter for them, but she was not on my
24 team.

25 So after the election, their -- the political team wasn't really doing that much,

1 assuming people had already voted and that's their whole "get out the vote" effort.

2 So the political copywriters, I was told they were available to help with fundraising
3 copy because we needed help. So she wrote something and I provided an edit. And so
4 my in-box alerted me that she resolved an edit that I gave her.

5 Q So why is this in your Gmail? '

6 A The emails were in Google Drive, in my Google Drive.

7 Q Which emails? Like, I'm trying to get a sense of, like, how does this
8 compare to what we've heard about with, like, Trello, for example? Like, we're looking
9 at Google Drive here, but why is this in Google Drive versus in the Trello program we've
10 heard about?

11 A Because Trello is just like a management tool. You can't actually create a
12 document in Trello. So our documents were created through Google Documents on our
13 Google Drive, and we would paste the shared link on Trello.

14 Q Okay. So of these Google Drive emails we received from you, are
15 those -- would every edit that was resolved or provided post-election have ended up on
16 your Google Drive?

17 A No, actually. I don't know why this one is there. I mean, I know there are
18 a few of them that hit my in-box, and I do not know why.

19 Q Okay. So post-election, who all provided -- who all drafted copy that came
20 to you?

21 A Mr. Steggerda. Post-election.

22 A Ms. Allred. Post-election. So the three normal copywriters, Alex Murglin,
23 Ethan Katz, Alex Blinkoff. Ethan and Alex Blinkoff got let go at the end of -- at the end of
24 November.

25 A But immediately post, it's those three. Then Karla Howard, who's in this

1 example. And Ashley Grace Novak would've also been a political copywriter.

2 BY [REDACTED]:

3 Q Okay. Anyone else?

4 A Not that I can remember.

5 Q Did Kenneth Mika draft any copy?

6 A He was not drafting copy. He was the email director, so he had access to
7 all of the copy docs.

8 Q Okay. Did Ashley and Karla draft copy through January 6th?

9 A I do not remember. Because they were on the political team, and I believe
10 they were employed by the RNC, at some point I think they started doing the Georgia
11 runoff election, which I wasn't involved in. So I don't think they wrote fundraising copy
12 for the joint fundraising committee through January 6th.

13 Q So when I look at emails and I see post-November, who's drafting copy in
14 December?

15 Mr. Steggerda. By December. Do you remember?

16 Ms. Allred. By December, Ethan and Alex Blinkoff were no longer there, so I
17 believe it just would've been me and Alex Murglin.

18 BY [REDACTED]:

19 Q Okay. And how would you -- how do you recall doling out assignments?
20 Did you guys do a 50/50 split? Did he do the first pass of everything? Was that
21 something you just did on your own?

22 A I don't remember how it was split. I continued to review his copy. I don't
23 think he touched every single piece of copy. I think that would've been too much work.
24 But, I mean, we split it up.

25 Q So is there any copy that goes out from TMAGAC? Is it fair to say that if

1 TMAGAC sent a fundraising email, that that would've come -- where donation is
2 solicited -- that would've come through your team?

3 A I cannot think of a time that fundraising email -- a fundraising email would
4 come from TMAGAC, not through my team.

5 Q Okay. Would TMAGAC have sent any emails that were not fundraising
6 emails, to your knowledge?

7 A Maybe they sent, like, "get out the vote" emails, but I'm not sure.

8 Q Okay. So let's say theoretically if TMAGAC sent a fundraising -- sent a "get
9 out the vote" email, which I don't think I've seen one, but if they did, would that go
10 through this political team process and not touch your team? Or would that -- did you
11 draft emails where you didn't solicit a donation in?

12 A Again, I don't know if they went out on TMAGAC. But if they did, I'm not
13 sure if I would've seen them. I know every once in a while on the political team they
14 would say, "Hey, we wrote this email. Do you mind looking it over?" But I don't think I
15 wrote any political emails from scratch.

16 Q Yeah. So when we go back to this email, exhibit 3, and here, is it fair to say
17 that this is a comment that you were giving Karla, are you giving her feedback? It
18 says -- under your name, it says, "I would include some examples of the fraud we've seen.
19 Eric Trump has some good tweet/video on Twitter about it." And then it says "Karla
20 Howard," and under that it notes, "Marked as resolved."

21 So is that a comment from you to her?

22 A Yes. I believe that's an edit I would've -- I would've highlighted something
23 on the email and gave her that edit.

24 Q And then when she says resolved -- "Marked as resolved," that's her letting
25 you know, I've addressed -- I've done what you asked me to do. Is that fair?

1 A Yeah. That's, like, automation from, like, Google when you, like, check it.

2 Q Okay.

3 A It, like, sends you that message.

4 Q So here -- this is November 5th -- when you say, "I would include some
5 examples of the fraud we've seen," do you recall what you're referencing?

6 A I don't, but I was clearly referencing something on Trump's Twitter.

7 Q So is this an example of how you were pulling things from Twitter, like, you
8 see something and you think, like, "Hey, we're monitoring this world, pull it down, and
9 let's use it in an email"?

10 A I mean, I would say President Trump and his family provide, you know, the
11 best content on Twitter. So sure.

12 Q Yeah. And would you, in an example like this, if Eric Trump posted
13 something, would you then engage in, like, a further -- like, okay, he claimed this or he
14 posted something. Would you then say, like, "I should go research it"? Or is it fair to
15 say that you would pull it, use it, and then the approvals team -- research, comms,
16 legal -- would then serve the role of, like, vetting that work, that cite?

17 A If he -- if Eric Trump was tweeting something and I just have no idea what he
18 was talking about, then I would probably try to, like, understand it so that I could write
19 about it better.

20 But I would -- I mean, one, I'm relying on -- I'm relying on Eric Trump to -- I mean,
21 I'm believing what he's saying. I believe he's believing what he's saying. So I'm relying
22 on that as my "Is this true or not." And then, yes, I am also relying on approvals.

23 Q Yeah. And that's -- is that the same kind of process with President Trump?

24 A Yeah. I mean, I'm -- President -- again, I believe President Trump believes
25 what he was saying, and so, yes, I believed him. But, yes, I'm also assuming that if it

1 goes through approval, I'm relying on them to make sure that I'm not putting anything
2 out that's incorrect.

3 Q Let's look at exhibit 4, please. So this is comments. "Ashley Grace Novak
4 resolved suggestions in the following document." So she's, like, she's drafting -- it says,
5 "Stop the Fraud SMS," some text. And then it has -- you provide some edits.

6 So at multiple times in this email you say -- I think it's three times -- you say,
7 "Replace: 'trying to' with 'will try to.'"

8 Tell us a bit about -- tell us why you gave her the edit to change "trying to" to "will
9 try to."

10 Mr. Steggerda. Do you remember that one?

11 Ms. Allred. I don't remember this edit specifically. If I'm making that edit, it's
12 most likely something we received from the legal team. Advice on that.

13 BY [REDACTED] :

14 Q And without telling us anything that the legal team told you, what makes
15 you think that's from the legal team?

16 A I mean, I don't know why else we would be making that edit. I'm not that
17 particular about three words, so I'm not sure I actually would've made it.

18 Q Do you recall any other edit coming from anyone about "Democrats are
19 trying to steal the election" versus "They stole the election"? Is that an edit you ever
20 received from anyone?

21 A I can't remember.

22 Q Do you remember getting any feedback regarding the use of the word
23 "rigged"?

24 A I do remember at some point we were told we could no longer use the word
25 "rigged."

1 Q Who gave you that edit?

2 Mr. Steggerda. If that had anything to do with legal -- if you don't remember and
3 say "I don't remember," that's fine. If you think that the likely source of a comment that
4 had to do with the word "rigged" in particular, then I don't want you to waive privilege for
5 the legal team of your former employer.

6 Ms. Allred. Yeah. I would have to say that edit would've -- from what I
7 remember -- would've come from the legal team.

8 [REDACTED] How often did the legal team weigh in? Was that a
9 common thing, or was that noteworthy?

10 Ms. Allred. I don't remember. I don't think it was very often. I mean, while I
11 was cc'd on the approval chains, I wasn't really monitoring them that closely. I wasn't
12 the one, like, implementing the edits that were given.

13 [REDACTED] And you heard that was the word "rigged," right?

14 The Reporter. Rigged, yes.

15 [REDACTED] Okay. I'm getting a message that folks heard something
16 else.

17 Ms. Allred. Oh, no.

18 BY [REDACTED]:

19 Q Okay. Any other examples of edits you remember getting, any comms
20 edits or research edits you remember getting post-election?

21 A Post-election? No. "Rigged" is really the only one that I remember.

22 Q So the emails that went out, besides like tweaking them, any other feedback
23 you resolved? Because we see a lot of emails obviously between November 3rd and
24 January 6th.

25 A Uh-huh.

1 Q Tell us about any -- from whether it's Zach Parkinson or anyone else, what
2 edits you remember people giving.

3 And if it's legal, if you remember a legal edit, hold it to the side, but tell me if you
4 remember one.

5 But think about any -- do you remember people providing edits?

6 A I mean, I know people were making edits. I don't remember them, though.

7 Q What kind of edits?

8 A Again, I don't have any examples.

9 Mr. Steggerda. Do you remember any kind of, like, fact edits from comms or
10 research or whoever? Like, do you remember citing any? I mean, he's just asking for
11 any examples you can remember.

12 Ms. Allred. I mean, I can give you examples before the election. I don't have
13 any specific examples after the election.

14 BY [REDACTED]:

15 Q Do you have, like -- what examples do you have in your head now from
16 pre-election?

17 A One could be, like, let's say we were talking about a polling number, like,
18 "Oh, President Trump is up in the polls," I remember one time Zach responded and said,
19 like, "Where did you get this polling number?" And so we sent him the link on where we
20 got the polling number.

21 Q Any other examples?

22 A I mean, we've talked about how we changed "match" to "impact."

23 Q Yeah.

24 A I mean, every once in a while they would make, like, a spelling or grammar
25 edit, but --

1 Q Do you remember, post-election, having discussions about whether or not
2 the election fraud assertions were true?

3 A After the election?

4 Q Yeah. And one thing I'll say, is, like, right, it's been publicly reported, right,
5 that the campaign had individuals in research who would look at assertions that people
6 were making of surrogates or allies of President Trump regarding fraud. And the
7 campaign would try to understand, like, "Hey, is this true or it's not true?" folks like Zach
8 Parkinson.

9 So when those emails went out, when you all were pulling from things, did you
10 see any discussions or pushback or clarification regarding fraud claims? Do you
11 remember any of those post-election?

12 A No, I don't remember any.

13 Q So kind of give us your characterization. Is it fair -- was the approvals chain
14 pretty -- I don't want to use the word "quiet," but was it relatively, you guys drafted
15 emails and folks kind of nitpicked maybe, but they kind of went through? It
16 wasn't -- from your vantage point, there wasn't much back and forth regarding -- or
17 hand-wringing as to what to do?

18 A I mean, I don't think I can give you a good answer on that because we were
19 writing so much copy. Once an approval chain was being sent, I wasn't really paying
20 attention to it. I was focused on what I was doing next. So I was not -- while I was
21 cc'd, I really was not monitoring them.

22 Q But then when the edit came back, it would be up to your team to make the
23 edit, right?

24 A No.

25 Q Okay. So who would make the edit?

1 A So Julia would physically make the edit on the copy documents.

2 Q Now what would happen if someone made a -- you know, I think previously
3 you had said in your last interview that sometimes people said, like, change this -- you
4 know, change this word. But they might not tell you what word to use then. Julia
5 wasn't drafting content, right, copy?

6 A Right. She was just making edits.

7 Q Right. So if an edit came back where someone said, "change this" or "don't
8 use this" or "where did you get this from?" that would be you and your team that would
9 have to respond, right?

10 A I don't think I ever responded to an approval email. Like that one example
11 when Zach asked for a source, I believe Julia probably responded. Like, I provided it to
12 her probably and she responded.

13 Q Okay.

14 A If someone's saying don't use this word, from what I can remember, it was
15 just easier to remove the word than to replace it and, like, send it back through.

16 Q Okay. So who would make a decision, the kind of creative decision, to
17 replace the word?

18 A I think, sorry, maybe I wasn't clear. We would probably just, like, remove
19 the word and, like, not replace it.

20 Q Yeah, but who would make the decision, as opposed to replacing it?

21 A Oh.

22 Q That seems like the decision to replace or to remove alone seems like a
23 creative decision. Because Julia -- is it fair to say that Julia performed what might be
24 deemed more of an administrative role in this process?

25 A I would say she was administrative.

1 Q Okay. So when edits -- if an edit had to be dealt with that involved any kind
2 of creative component, is it fair to say that you and your team would be tasked with that?

3 A I don't know if that's fair to say. I think Julia had the understanding that if
4 something was asked to be removed and the sentence made sense with that word still
5 removed, then she could just remove it, and, like, we didn't really need to know about it.

6 Q Yeah. So do you remember yourself having to weigh in at all, post-election,
7 about changes to an email that came from the approvals group?

8 A I don't remember weighing in on anything.

9 Q Do you remember any discussions where folks were discussing how to deal
10 with claims related to election fraud?

11 A What do you mean how to deal with them?

12 Q As in, if any questions regarding the substance of election fraud claims.
13 You mentioned, right, Zach may ask where did you get something from. Do you
14 remember any discussions about sourcing for election fraud claims, truth or accuracy,
15 trying to substantiate them, any discussions at all post-election?

16 A On the approval chain or --

17 Q Let's start with the approval chain, and then we'll do otherwise.

18 So on the approval chain?

19 Mr. Steggerda. Do you remember anything?

20 Ms. Allred. No, I don't remember anything.

21 [REDACTED] Okay. Separate from the approval chain, do you
22 remember any discussions about that?

23 Ms. Allred. No. I mean, again, we were all very closely monitoring what Trump
24 and his family were saying, what the legal team was saying in press conferences, the
25 statements going out. So I don't think we really needed to discuss it because we're

1 seeing all this, what we considered proof on, like, on all these platforms that these things
2 we're saying are true.

1

2 [1:09 p.m.]

3 BY [REDACTED] :

4 Q Yeah. And when you say "proof," you mean you would rely on President
5 Trump and campaign surrogates for what was -- at least for the initial step of the copy
6 creation, what was true, and on the back end the approvals chain would do their job. Is
7 that fair?

8 A Yeah, I mean, it's -- I -- you know, I trust what President Trump was saying.
9 He believed what he was saying. I believed it. I also believed, you know, his legal -- his
10 lawyers are going on TV and telling us all this stuff, and I believe what they're saying. I
11 mean, I don't have a law degree, but I would trust what a lawyer was saying.

12 Q Do you recall which lawyers were on TV that you were trusting?

13 A I mean, I know President Trump's lawyer was Rudy Giuliani. That's really
14 the only one I remember. I mean, I know there were others, but --

15 Q Yeah. But he's one of the ones you're talking about here?

16 A In terms of, like, giving press conferences, yes.

17 Q Yeah.

18 But, just to be clear, at no point did anyone ever give you reason to believe
19 that -- to question any of this, of the fraud claims. Like, Zack Parkinson or someone in
20 that position never pushed back or otherwise asked for clarification or sourcing for
21 anything you provided, that you can recall?

22 A Nothing that I remember.

23 Mr. Steggerda. In other words, up the chain, like, above you --

24 Ms. Allred. No.

25 Mr. Steggerda. -- do you remember anybody ever pushing back at you and

1 saying, from your team, you know, some concern about what the messaging was?

2 Ms. Allred. No, I don't remember any of that.

3 BY [REDACTED] :

4 Q Okay. Let's go to -- we'll come back to this.

5 Let's go to exhibit 5. So this is a November 5th fundraising email again from
6 TMAGAC, and it says, "Breaking: President Trump Wins Pennsylvania."

7 And it says, "This is a HISTORIC achievement, and we can't stop now. The fight
8 isn't over yet, and we need YOU to help us PROTECT the Election from outside threats."

9 A Uh-huh.

10 Q Do you recall this email?

11 A Not specifically, but it looks like something we would've written.

12 Q Okay.

13 I think we talked about it last time in your informal interview, about a
14 disagreement you had with Ethan Katz when you directed him to write an email and he
15 expressed reservations about that.

16 A I remember my conversation with Ethan. I did not direct him to write an
17 email.

18 Q Okay.

19 A He told me, if this topic comes up in an email, I'm asking -- I'm telling you
20 that I'm not comfortable with writing it. But I never had asked him to write it.

21 Q Okay. So tell me your recollection of that.

22 A I mean, basically, what I just said. I don't remember specifically what email
23 it was about. I know it was about claiming victory in a State that had not yet been
24 officially called. He said -- because we had been, you know, writing the victory emails,
25 like I said, for Florida and whatever other States we were winning.

1 And he said, you know, if this State comes up and it hasn't been announced, then
2 I'm not comfortable writing that email. And I remember telling him, okay. I mean, we
3 have two other copywriters. Like, I don't need you to write that email.

4 Q Okay. And I want your recollection to control the -- but I'm just looking at
5 our notes from our last meeting, and what we have down is that you recall the
6 conversation with Katz where you were going to put out emails regarding Trump winning.
7 You didn't recall which State it was, possibly Pennsylvania, where results were still up in
8 the air but President Trump had called it for himself, and Ethan Katz did not feel
9 comfortable writing an email that Trump had won the State.

10 Are you saying today, now, that there had been no decision to write the email,
11 that Ethan, on his own, just came up to you and said, "Hey, by the way, if someone is
12 thinking about this, even though no one has mentioned it, I won't do it"?

13 A That is my memory. Ethan is -- yes. He's very vocal, so that's not
14 uncommon for him, to just bring something up that hasn't even been discussed yet and
15 let me know.

16 Mr. Steggerda. But the distinction that [REDACTED] drawing is, do you remember that
17 that conversation arose because you told him --

18 Ms. Allred. Oh.

19 Mr. Steggerda. -- to write this email or not?

20 [REDACTED] Or otherwise discussed it.

21 Mr. Steggerda. Or what you just said today, you don't remember it being around
22 a specific email ask, it was more around a topic? Which is --

23 Ms. Allred. Right. I --

24 Mr. Steggerda. -- to the best of your recollection on that?

25 Ms. Allred. From my memory, I did not ask him to write a specific email. We

1 were talking about emails; I don't even know if it was this email specifically. And he
2 said, if this topic comes up and we're writing an email on it, I don't want to write it.

3 BY [REDACTED] :

4 Q And by "this topic," you mean President Trump claiming that he won a State
5 that he had not won yet?

6 A I believe it was about announcing victory in a State that had not yet been
7 called, but I can't be certain. But I do think that's what it was on.

8 Q Do you recall having discussions about an assignment about preempting a
9 call for a State?

10 Because, like, this email comes out before -- obviously, President Trump did not, in
11 fact, win Pennsylvania. We know that now. The email comes out before Pennsylvania
12 was called for either candidate. So, looking at the email, when the campaign releases it,
13 it's preempting a call, right? It's done. It's not breaking that CBS said it. It's breaking
14 that TMAGAC has said, President Trump has won Pennsylvania.

15 So take us through what conversations you recall as to the genesis of this
16 fundraising email.

17 A I mean, we quoted, you know, Bill Stepien, the campaign manager. He is
18 saying, you know, based on the math, that we were on the pathway to winning
19 Pennsylvania, so we were going to preemptively call it --

20 Q Yeah, but I hate to interrupt you, but that quote from Bill Stepien does not
21 say that President Trump won Pennsylvania, right? The email says, we have won
22 Pennsylvania -- President Trump wins Pennsylvania. The Stepien quote doesn't say that.

23 So I'm asking that -- the copy team, your team, drafts this email. What's the
24 genesis for that idea that President Trump won Pennsylvania?

25 Mr. Steggerda. If you remember.

1 Ms. Allred. I don't remember. Yeah, I don't remember exactly.

2 BY [REDACTED]:

3 Q Do you remember any discussions regarding drafting an email claiming that
4 President Trump won a State that hadn't been called yet?

5 A I remember -- I mean, we drafted, I believe, this email on Pennsylvania and it
6 had not yet been called yet, so I remember that.

7 Q Okay. Do you remember, is that the kind of thing that Hanna Allred
8 would've decided that, "Guys, we're supposed to get ahead of Pennsylvania," or is that
9 the kind of thing that you think you would've been told -- your team would've been told
10 to put together?

11 A That decision would not have come from me. Again, we're quoting the
12 campaign manager. I obviously don't remember exactly where that quote was, whether
13 it was online or in an official statement on Pennsylvania. Again, if we had received
14 direction, it would've been from Austin.

15 Q Okay.

16 Also in this email we see an election defense fund mentioned. It says, "our
17 critical Election Defense Fund."

18 A Uh-huh.

19 Q Is it fair to say that the election defense fund was, like with "match" and
20 "impact," it was one of those marketing tactics, like, the idea of getting people invested in
21 the idea of a fund?

22 A We frequently use funds as a marketing tactic. However, at this point, I'm
23 under the impression that the money we're raising is going towards, like, a legal efforts,
24 which is to defend the election. So I don't believe there is actually a fund called the
25 "Election Defense Fund," not that I'm aware of.

1 Q Yeah. Yeah. So the benefit of writing or framing it that way, it's fair to
2 say, is like you're saying: People on both sides use the idea of "fund" so people can feel
3 invested and contribute to an idea. Is that fair?

4 A Yes. Funds are used as a marketing tactic, from my knowledge.

5 Q Okay.

6 Did anyone tell you where the money would be going specifically? Was that
7 something they -- and I say that only to be like, I would expect that's not in your
8 wheelhouse.

9 A Right.

10 Q Your job is not to decide where money goes or doesn't go; your job is to
11 write copy. But --

12 A Right.

13 Q -- did anyone, kind of, tell the copy team, hey, folks, here's what we're doing
14 with the money or here's how we're spending it?

15 A I think I said earlier, when Gary had that meeting with us, he said, we're
16 going to continue fundraising to have money for, you know, the legal efforts.

17 Q And is that -- did that remain true -- like, going November, December, did
18 the senior people tell the team, like, hey, this is still about legal efforts, keep focusing on
19 legal efforts?

20 Because we see a lot of emails that keep talking about "Election Defense Fund,"
21 "Election Defense Task Force." Were you getting directives that the campaign -- that
22 that's where the money was going, that's what the money was needed for?

23 A I don't remember getting multiple directives, but the entire time, I am under
24 the impression that the money is going towards legal efforts.

25 Q Uh-huh. Okay.

1 Now, speaking about the lawyers, you know, we talked about, you know, we have
2 the election defense fund, the lawyers. You mentioned Rudy Giuliani.

3 Were you aware, you know, like -- and I know the 15th floor, right, that's where
4 the senior folks were -- is that fair? -- in the annex.

5 A We had a 14th and 15th --

6 Q Fifteenth. Okay.

7 A -- floor. I have no idea who's on the 15th floor.

8 Q But you understood that some of the bigwigs were there. Is that fair?

9 A Uh-huh.

10 Q Were you aware of any discussions, even water-cooler -- which I don't know
11 if is a phrase people still use -- but water-cooler discussions about, kind of, like, a rift in,
12 like, the Trump legal team? Like, did people kind of put Rudy Giuliani on one side versus
13 other lawyers? Or did you all kind of see -- like, was there no distinction for you when
14 you thought about the lawyers you were relying on and looking at them?

15 A I don't think there was a distinction. I don't think I associated Rudy Giuliani
16 with, like, the campaign legal team until post-election.

17 Q Okay. So post-election is what I'm talking about --

18 A Right.

19 Q -- right? Because what we've heard is that some people kind of have this
20 idea that, like, there were these normal folks over here and there was, like -- some people
21 used the term "the clown car" over here.

22 A Uh-huh.

23 Q When you were drafting these emails, looking at the lawyers, pulling their
24 words, was that a thing that was even in your head at all, that idea? Did anyone express
25 that to you? Had you heard that?

1 A No, I wasn't really thinking about who was on the legal team or how it was
2 made up.

3 Q Yeah. Okay. And you didn't have any discussions, even informally, with
4 coworkers about any of these kind of things. Is that fair?

5 A Right. I don't remember talking about it with anyone.

6 Q All right.

7 Who is -- let's look at exhibit 6. I don't think we've talked about Lucas Brennan.
8 Who is that?

9 A He's on the email team. He reported to Kenny, or Kenneth Mika. I
10 believe his title was deputy email director.

11 Q And what's going on here? What's he responding to comments or, like --

12 A It looks like he commented -- I'm not entirely sure. It looks like he deleted
13 something, is what it looks like.

14 Q Is there anything that happened between him that's relevant for TMAGAC
15 fundraising, post-election?

16 A No. It's very possible he just saw, like, a stray period or something and
17 deleted it, and it would've tracked it.

18 Mr. Steggerda. Who was Brennan again?

19 Ms. Allred. He reported to Kenneth Mika on the email team.

20 BY [REDACTED]:

21 Q Okay.

22 All right. So this is November 8th. So, looking at the timeline, November 3rd,
23 we have the election night. Approximately November 5th, we have Gary Coby's
24 all-hands meeting with the Ethan moment. We have the Pennsylvania email that day.

25 Then we get to Saturday, November 7th. President Biden is declared

1 President-elect.

2 A Uh-huh.

3 Q When President Biden is declared President-elect that Saturday, do you get
4 any kind of further directives from senior leadership as to whether that impacts both the
5 campaign or fundraising specifically?

6 A I don't remember receiving any communication on it.

7 Q Is it fair to say --

8 Mr. Steggerda. Go back to Friday, though, too. Like, walk --

9 Ms. Allred. Oh, okay.

10 Mr. Steggerda. He's trying to get a sense of what happens at the end of that
11 week and did that change your thinking, et cetera.

12 Ms. Allred. I do remember Friday, specifically, because I was talking to Austin,
13 talking about, like, what are we doing for the weekend, what's the weekend look like?
14 Like, what time do we need to be here tomorrow? And he's like, "Oh, we don't need to
15 come in tomorrow," tomorrow being Saturday, which I found surprising because we had
16 been in person 7 days a week for who knows how long.

17 So, at that point, you know, I'm confused. Because, you know, at this point, I
18 don't think they had called the results on Friday, so I'm under the impression that, you
19 know, we're still trying to -- we're still trying to find a path to victory at this point on
20 Friday, from my knowledge. So, when I'm told not to come in on Saturday, it's a bit
21 confusing.

22 And, I mean, I was never really told why we weren't coming in on Saturday. And
23 then, like you said, President Biden was announced the President-elect. I mean, we still
24 have things going out over the weekend, but I'm not really sure where we stand at that
25 moment.

1 BY [REDACTED]:

2 Q And when you were told not to come in by Austin, did you ask him why?

3 A I don't remember. If I did, I didn't get any information.

4 Q Yeah. Did you have any of your own understanding, or did you draw an
5 inference, such as, like, seems like Austin maybe had a conversation with senior people
6 that things don't look too hot?

7 A I mean, of course I'm confused, because, again, I don't have any background
8 information on why we're not coming in. I'm disappointed. And, yeah, for a second,
9 I'm thinking, like, wow, like, the campaign's giving up. Like, we're not coming in.

10 Q Yeah. Because it wasn't a cheerful -- is it fair to say it wasn't a cheerful,
11 "Hanna, don't come tomorrow. Got great news. You might find out soon"? It was
12 more so like, let's pull back a bit?

13 A Yeah, I mean, I don't -- I don't think we were pulling back, because we are
14 still fundraising a lot. But I was kind of like, wow, like, I can't believe we're not coming
15 in. Like, it sounds like we're giving up, which was quickly -- it was a very fleeting feeling,
16 because we were still working and back to work on Monday.

17 Q Okay. So tell us what happened. So you had the conversation Friday.
18 Saturday, President Biden is declared the President-elect.

19 Mr. Steggerda. By the media.

20 [REDACTED] By the media. Which, for the record, is the only person
21 that can declare anyone President-elect for all of human history, but that's beside the
22 point.

23 Mr. Steggerda. Well, maybe the candidates can.

24 [REDACTED] Well, I think that's a new one, Todd, but --

25 Mr. Steggerda. I'm with you.

1 BY [REDACTED]:

2 Q But what changes to when you kind of -- like, Monday? Like, does Austin
3 tell you, like, "We're back"? Like, tell us a bit about those conversations.

4 A I really don't remember any conversations on Monday. I know at some
5 point -- I mean, I know we're -- I don't remember any conversations --

6 Mr. Steggerda. Well, how did you know to come to work on Monday, maybe is a
7 more basic question.

8 [REDACTED] Yeah.

9 Ms. Allred. I don't know. It's possible I asked him on Friday, like, are we
10 coming in Monday, and he said yes, or maybe he said, wait to hear from me. I really
11 don't remember how -- we all were in on Monday. I don't know why we knew to go, but
12 we were there.

13 I don't remember any conversations that week. But I think, at this point,
14 lawsuits are really ramping up from the RNC, and so I think that's where we're drawing all
15 of our content from. And, again, you know, I'm being told we're raising money for a
16 legal fund, so --

17 BY [REDACTED]:

18 Q And who's telling you that?

19 A I believe Austin told me that.

20 Q Okay. So do you remember any other conversations that -- do you have a
21 recollection that, like, there was a "we're back at it" feeling, like, "this is back on"? Or
22 was it more, you just came to work and Austin was, like, acting normal so you just went to
23 go do your job?

24 A I mean, I can't remember any conversations.

25 Q Okay.

1 Mr. Steggerda. Well, but the -- just so you're clear, at the end of a campaign --

2 Ms. Allred. Uh-huh.

3 Mr. Steggerda. -- you kind of -- you end the race, right?

4 Ms. Allred. Right.

5 Mr. Steggerda. And then you say you go home that weekend and they say,
6 "Don't come in on Saturday," you know, as you've just mentioned.

7 When you come back in Monday, [REDACTED] question is, the concept of "we're still
8 going" --

9 Ms. Allred. Right.

10 Mr. Steggerda. -- do you remember that? Like, where -- like, you gotta get
11 back up again.

12 Ms. Allred. Yeah.

13 Mr. Steggerda. I mean, what do you remember about that Monday, is I think
14 what he's trying to get at.

15 [REDACTED] Yeah.

16 Ms. Allred. I mean, I remember -- I mean, the way I felt was, I mean, I was -- you
17 know, I was fired up. You know, I was thinking, like, yeah, we're doing recounts, we're
18 filing lawsuits. Like, this is very much still going on. We need to continue fundraising.
19 This stuff's expensive, I'm sure.

20 There was also, like, some weird feelings in the office. I mean, no one knew, like,
21 how long was this going to go on for? Like, everyone knew that cuts were going to be
22 made after the election, so it's like, okay, how long am I going to be employed for now?
23 Like, I thought I was going to be out of a job.

24 But, I mean, I think everyone, including myself, we were excited. I don't -- I have
25 no idea if any meetings happened.

1 BY [REDACTED]:

2 Q Why did you think you'd be out of a job, if you proceeded -- if you were with
3 the RNC?

4 A Oh, I mean, I didn't personally feel like I was going to be out of a job,
5 because I was at the RNC. You know, I figured, okay, the election's over, they still need
6 copywriters in general. Like, you don't just stop fundraising because there's not an
7 election that year. So I felt pretty safe in my job.

8 But a lot of people that came on later in 2020, I believe, were hired knowing that
9 this is a temporary job.

10 Q Okay.

11 Let's look at -- so we're talking about Monday. Let's go to the Tuesday,
12 November 10th, exhibit 7.

13 A Okay.

14 Q And it's an email -- Austin forwarded you an email from Candace Owens.
15 And he says, "We should do similar email. Calling out headlines that the fake news has
16 put out and also how big tech is censoring POTUS."

17 A Uh-huh.

18 Q Is this kind of an example of Austin -- like, how he would give you
19 assignments?

20 A Occasionally he would forward me things that he got in his own inbox, but it
21 wasn't frequent. Every once in a while it did happen.

22 Q Uh-huh. So, when he says "calling out headlines that fake news has put
23 out," what does that mean?

24 A I mean, you know, I think it's fair to say that people in the Trump world used
25 the term "fake news" a lot. I think that's most likely referring to, I guess, left-leaning

1 media that's putting out false stories.

2 Q So, in the email, she notes here, it's The New York Times, CNN, NPR, CBS.

3 Was that all, kind of, what you're talking about there?

4 A I mean, I don't think there's, like, a defining thing that puts you in the "fake
5 news" category, but, yes, I would assume that's what he's referring to.

6 Q Uh-huh.

7 So, here, you're seeing -- so, when these kind of things come out, when the
8 various news sources -- New York Times, CNN, NPR, or CBS -- are saying that the claims of
9 voter fraud are baseless --

10 A Uh-huh.

11 Q -- is that the kind of thing you're researching yourself? Are you looking into
12 these? Are you educating yourselves on what these news sources are saying?

13 A I mean, I suppose I'm looking into them, as far as, like, I'm reading the
14 article. But, I mean, again, I don't have a background to decide whether something is
15 baseless or not. So, I mean, I would know enough about the topic to be able to write an
16 email on it.

17 Q Did you -- I mean -- and, again, we're asking as a layperson --

18 A Uh-huh.

19 Q -- because I don't know if anyone's necessarily -- all of us are laypeople, to
20 some degree, as citizens.

21 A Uh-huh.

22 Q But when you were reviewing this, were you engaging and saying, like -- you
23 know, all these places are saying the claims are baseless. Are you going and weeding for
24 yourself and finding out, like, what you think? Or is that not really relevant for your
25 work, so you don't do it?

1 A I wouldn't say I'm in the weeds, but, you know, I, like -- "Baseless voter fraud
2 claims." Again, I do not remember this email, but if I saw that, I would probably think to
3 myself, how are they saying it's baseless when here we have the legal teams for President
4 Trump and RNC telling us that there are claims of voter fraud or, you know, whatever else
5 that could affect the election?

6 Q Yeah. Would you ever just engage on the substance and decide for
7 yourself? Like, did you ever -- issues where -- I understand, like, there are two sides.

8 A Uh-huh.

9 Q But, like, someone can be lying on one side or mistaken on one side or not
10 provide a full, complete answer on one side.

11 So did you ever, for yourself, as part of your job, engage on the substance and
12 decide for yourself --

13 A I mean --

14 Q -- either way?

15 A Yeah. I mean, at my job, you know, I'm in a position where I'm receiving all
16 this communication and content that there are claims of voter fraud, there are
17 discrepancies in the election. So, based off what I'm seeing, yes, I did believe that there
18 were discrepancies in the election.

19 Q And by virtue -- these claims coming from the news sources, you thought
20 those were in accurate, their analysis -- is that fair? -- that you said you read.

21 A Like, I would say "baseless voter fraud claims," to me, was inaccurate.

22 Q Yeah.

23 So let's go -- so this is November 8th -- November 10th.

24 Are you familiar with the Save America PAC?

25 A I am --

1 Q President Trump's leadership PAC.

2 A I am now. At the time, I was not.

3 Q Okay. So when did you become -- did you become aware of it after
4 January 6th?

5 A I became aware of it in February of 2021.

6 Q Okay.

7 So, when you were writing the emails, as you'll see -- we can look at -- I mean, I'll
8 just tell you, but it's in the exhibit 8 --

9 A Uh-huh.

10 Q -- right? This is an email from -- which I think is on this side -- it's an email
11 from November 12th. And you see, like, at this point, the disclaimer -- it's really small
12 here, but --

13 A Uh-huh.

14 Q -- I will proffer to you, as a lawyer -- say that it's an email that has a
15 disclaimer. It's now added Save America. So, previously, the TMAGAC had the RNC
16 and the Trump campaign, and now Save America is added.

17 Do you have any recollection -- I assume you don't -- but any recollection of when
18 Save America was added or why it was added?

19 A No. I was not in charge of the disclaimer, so I was not aware.

20 Q But the assumption -- since you learned about it in February, it's fair to say,
21 you had no discussions about Save America in any capacity that you can recall prior to
22 January 6th.

23 A Nothing I can remember.

24 Q Okay.

25 We'll go to exhibit 9, which is a November 16th email.

1 Here, it says that, you know, gopcopy2020@gmail wants your email address to be
2 their recovery email.

3 What is gopcopy2020@gmail?

4 A So, at some point, everything on the Google Drive, we switched it to private
5 links, meaning, like, you could not open Google Drive unless you were given access to that
6 link. And, you know, a lot of people needed access to these links -- the copy team,
7 everyone on the email team.

8 And so, rather than individually typing everyone's email address, we said, hey,
9 why don't we just get a generic Gmail that everyone has access to so that we can just
10 share the Google Doc with this email address and everyone can access it without me
11 having to individually invite everyone.

12 Q So would this email address, like, the Google Drive of this, it had all, like,
13 edits that went through for the emails? Or what would be in it?

14 A It's possible that all the edits, like, in the ones we looked at earlier, would go
15 to this email address. I didn't really ever look at it, so I can't be certain.

16 Q But was it connected to the edits we've been talking about from this point
17 forward, or -- in this post-election-through-the-6th period, are these edits that you recall
18 kind of being logged in this account?

19 A I don't remember looking at it, so I can't be sure.

20 Q Well, not from what you're looking at. From your understanding as to the
21 process you just explained why it was set up, is it logical to say that it would have these
22 edits logged in there?

23 A Yeah, this was set up at some point in the summer of 2020, so I assume we
24 continued to use it through January 6th, and it is logical to assume that edits could be in
25 this email.

1 Q And who had control of this? Was there a master person in charge of it?

2 A I created it. I have no idea who controls it now.

3 Q Okay. And when you left the RNC, did you leave it in charge of someone?

4 A I'm not sure. Alex Murglin was still there.

5 Q Uh-huh.

6 A I mean, everyone had the password to get into this email address, because
7 that's how they accessed the Google Docs. So I assume he would have -- that he had
8 the password when I left.

9 Q Okay.

10 Let's look at exhibit 10. This is Thursday, November 19th, and it looks like Ashley
11 Novak is responding to edits for a fundraising email. It says, "Press Conference
12 Fundraising Email."

13 And in the second edit, you say, "Adding this in. We run tests frequently so
14 always note up here if there is/isn't one. (Mostly it'll be n/a.)"

15 A Uh-huh.

16 Q What are you talking about there?

17 A So, if we are running a test, like, a copy test or a graphics test or something
18 like that, we typically note it at the very top of our documents. Like, it'll say, like, "AB
19 test," and we'll highlight it. That way, it's just very obvious when the email team's
20 mocking it up that there is some sort of test in this email.

21 Q So it's fair to say that, post-election, you were still trying to optimize and run
22 tests to make these emails better or more effective. Is that fair?

23 A I'm not -- I mean, I don't remember these comments, and I don't think from
24 this it's clear if I was asking her to note there is a test or if I was asking her to note there
25 was not a test. Because we noted it either way.

1 Q I get that. But here it says, "Adding this in. We run tests frequently."
2 Like, that seems to indicate a present status. "We run tests frequently so always note
3 up here if there is/isn't one."

4 So, reading this, it seems like testing is still in play here. Is that fair?

5 A I don't think that's fair. I mean, I really can't tell from this if I was telling her
6 to note there is a test or there is not a test.

7 Mr. Steggerda. We just want you to be clear in terms of your recollection,
8 because --

9 Ms. Allred. Right. I --

10 Mr. Steggerda. -- earlier, you said you didn't remember that --

11 Ms. Allred. Right.

12 Mr. Steggerda. We talked about pre-election testing. I think that -- or I had
13 understood you to say you didn't remember testing going on in the 60-day post-election
14 period.

15 Ms. Allred. Uh-huh.

16 Mr. Steggerda. [REDACTED] asking you, does this kind of make you recollect that
17 maybe there was testing?

18 BY [REDACTED]:

19 Q And maybe even if it were limited in nature and not the norm, but that it
20 was not a foregone conclusion that testing would've ceased?

21 A Oh, I mean, there's no way I can say definitively if we were testing or not. I
22 do not remember running any tests. This comment -- like I said, I can't tell if I'm telling
23 her to add there is a test or there isn't a test, but whatever it was, she needed to add it.

24 Q Uh-huh.

25 A But I really don't know.

1 Q And, then, on the second page of this document, you have a comment here
2 which says, "If you delete this word then this preview will be OK."

3 A Uh-huh.

4 Q So does "preview" mean, like, when you get email on your phone, like, the
5 subject line, is that the preview? Or preview is the initial text? What does that mean?

6 A So the subject line is the subject line. Then the preview -- it depends on
7 how you have your email set up on your mobile phone. Sometimes people have their
8 previews on, which it's basically, like, an opportunity for a second subject line underneath
9 the original subject line. I don't know if it's actually called a preview. We call it
10 preview.

11 Q Uh-huh. And those are -- and the team copies all -- that's part of your role,
12 right, drafting the copy for a subject line and for extended preview, all that? Fair?

13 A Yes, we include that.

14 Q Okay.

15 All right. Next exhibit, exhibit 11, which is a November 30th email, again from
16 Ashley.

17 So, at this point, Ashley still is drafting comments, but Ethan and Blinkoff have
18 been let go, right?

19 A I believe, by this point, yes, they have been let go.

20 Q Okay.

21 A Or this probably was, like, their last paid day.

22 Q Yeah. But I think you testified previously, didn't Ethan leave prior to his last
23 payday? Like, he opted to just stop working, because that was an option that was given
24 to him.

25 A Yes, that was an option, and he took it.

1 Q Yeah.

2 So here at the second comment, you write, "Let's get to the 1,000% offer
3 extended faster. 1,000% is what is going to get them to donate so we need to have it in
4 the copy fairly quickly."

5 A Uh-huh.

6 Q Right? So this is an example of using one of those, kind of, marketing
7 tactics to effectuate your goals here, which is to get people to donate, right?

8 A Uh-huh.

9 Q And so, here, are you saying that you basically want them to see that faster
10 because that's what's likely to trigger a response?

11 A Yeah. I mean, we would like them to see the 1,000-percent offer higher up
12 in the email. People tend to click through emails pretty quickly, so we want them to see
13 that.

14 Q Yeah. And I think we'll get to it later -- or maybe this is -- I don't know if I
15 included it. But I think there's an email from you that indicates that folks read emails
16 for, I think it says --

17 A Like, 5 seconds.

18 Q Four seconds I think is what it says.

19 A Yeah.

20 Q So is it fair to say you need to grab them and grab their attention quickly,
21 because if you're going to get them, you're going to get them right away?

22 A Yeah. And, I mean, at this point, I think most of our emails probably have a
23 1,000-percent offer. And so, if someone's reading multiple emails and they're like,
24 "Well, this one hasn't offered 1,000 percent, I'm going to wait for the next one" --

25 Q Uh-huh.

1 A So you want them to see that it's there early.

2 Q So I'm going to show you the next exhibit, which is the same day,
3 November 30th, and it's from Austin.

4 A Is this -- oh, I see it.

5 Mr. Steggerda. Are you on 12, [REDACTED]

6 [REDACTED] This is exhibit 12, yes.

7 Ms. Allred. Okay.

8 BY [REDACTED]:

9 Q So it says -- the email from NRSC says -- it has a lot of "6X-MATCH," some of
10 that lingo we've been talking about.

11 And Austin goes, "Thinking for GA run off we start showing the polling numbers
12 like this. Good to include lines like we need the resources to make sure they don't try to
13 steal this election. We saw what happened on election night, we can't let them take the
14 senate too."

15 A Uh-huh.

16 Q So, when I read this, it seems to me like what Austin is saying is that it is an
17 effective line to tell people, "Make sure they don't try to steal the election," and that's
18 likely to get people to donate. Is that fair?

19 A Yeah, I would say from this second paragraph, what he's saying, this isn't
20 necessarily -- like, he's saying this would be good copy to include, if we were to write an
21 email similar to this.

22 Q Yeah. And I guess what I'm getting at is, kind of, like, the same way we
23 talked about, like, using "impact" or "match," it seems here he's basically saying, the
24 "steal the election" line is effective, that gets people to donate, that we should use a
25 line -- he says, it's "good to include lines like we need the resources to make sure they

1 don't try to steal this election." He's saying that's good because people will donate
2 because of those lines, correct?

3 A Right. It's giving a purpose to their donation.

4 Q Yeah. Did you have lots of conversations about that, like, the effectiveness
5 of this kind of -- these, like, "steal the election" lines?

6 A I don't remember having conversations on it.

7 Q But did you understand that line of copy, that message, was effective?

8 A I think the messaging of -- I mean, at this point, I don't know if we were
9 saying "steal the election," particularly, but about "election integrity," "defending," things
10 like that. I do think those words are effective, because people were upset and they
11 wanted their donation to go towards an effort to -- the legal effort.

12 Q So I'll give you an -- so, in the next email, exhibit 13 -- which is now
13 December 1st. So we were just on November 30th.

14 A Uh-huh.

15 Q You look at the second comment, and you say -- it says, "Do the same and,"
16 in all caps, "STEAL the Senate."

17 A Uh-huh.

18 Q So does it reflect your recollection, that you all were using the word "steal"?

19 A From this example, yes, it does look like we were using the word "steal."

20 Q And this would be the kind of example -- because the email says, "If it's only
21 georgia's future, the donors in other states won't care," right? So you want it to be
22 changed to "America."

23 And it sounds like, on December 1st, you're doing exactly what Austin asked on
24 November 30th, which is to use language about stealing the election in relation to
25 Georgia fundraising. Is that fair?

1 A I mean, I can't for sure say that exhibit 13 is a product of exhibit 12. I can
2 see how, chronologically, that makes sense --

3 Q Uh-huh.

4 A -- but I can't say for sure that that's -- I mean, the RNC was helping with
5 Georgia runoff efforts. Emails pertaining to that topic would've been written either
6 way.

7 Q Yeah. But is it fair to infer that you're putting Austin's directives into
8 action?

9 A I mean, I can't say for certain. Yes, the email did come after he gave us that
10 task, but, again, I don't know if this email was a product of what he's saying specifically.

11 Q When you say you don't know, it's because it could've been a product just
12 from you, not from him?

13 A Well, no, I just mean -- like, I don't think he -- I don't -- eh. Sorry.

14 Q I guess what I'm saying is that, here, you give a correction, you give an edit.

15 A Right.

16 Q So either it came from you --

17 A Uh-huh.

18 Q -- or it came from Austin, through you. So --

19 A Then, yes, I would say it probably came at the direction of Austin to use that
20 language, if we had -- I don't know if we had a conversation on it outside of the email he
21 forwarded me.

22 Q Okay.

23 All right. So we're actually making pretty good time.

24 So now I want to kind of zoom out a bit. So we have November 1st; there's lots
25 of lawsuits that have gone through November. I kind of want to talk about two things.

1 First, in real-time -- like, I think public reporting says \$255 million was raised from
2 election day through the end of the calendar year. And public reporting says that's a
3 whole lot of money and incredibly successful fundraising by TMAGAC and effectively your
4 team.

5 Did you get feedback in those 2 months that you all kind of did a great job and
6 really crushed it? Like, take us there. Just, did you have a sense of whether you were
7 successful -- understanding that they weren't fundraising projections or goals, but did you
8 have a sense of, like, guys, like, folks think we did a really good job?

9 A Do you mean feedback in those post-election days or, like, for the whole
10 cycle?

11 Q No. I'm talking about what happened post-election --

12 A Post-election.

13 Q -- through the end of the year.

14 So we're about to talk about December, right --

15 A Right.

16 Q -- but \$207 million, according to public reporting. By the time this email
17 from Austin comes in, public reporting says \$207 million has already come in.

18 Mr. Steggerda. What date are you on, [REDACTED]

19 [REDACTED] End of November.

20 Ms. Allred. End of November.

21 BY [REDACTED]:

22 Q So tell us about working at the RNC at that time, TMAGAC. Were you
23 getting feedback that you guys were crushing it?

24 A I mean, I remember everyone being excited about the amount we were
25 raising, because, I mean, as you said, it was a lot. I don't remember, like, ever having a

1 meeting where people were like, "Great job. You did great work."

2 But I think it was -- like, on the digital team, we were -- the fundraising team, from
3 what I'm aware, was the only team that had to continue working. And so, I mean,
4 people were telling us, like, you're going a great job, like, keep it up. But, I mean -- yeah.

5 Q Yeah. And who were those people that were telling you that?

6 A I mean, Austin would, you know, tell everyone, like, great job, I know we're
7 tired, like, I appreciate everyone's efforts, things like that.

8 Q Anyone else?

9 A Not that I can -- oh, the day after the election, Vice President Pence came in
10 the office and thanked us for all our hard work, but that was right after. I don't
11 remember anyone else thanking us for anything like that.

12 Q Were you aware of how much money was being raised in real-time? Like,
13 you know, when you were there in December, did you have a sense that, besides Austin
14 just saying a generic "good job," that, hey, we've already done 200 million, we've already
15 done 100 million? Did you have a sense of that?

16 A I don't remember specifically how much we were raising by that point. I
17 know the days right after the election, it was something crazy, like \$10 million a day. I
18 know by December, we weren't raising in December what we were raising immediately
19 after the election. I believe it was still a pretty good amount, but --

20 Q Yeah.

21 So, you know, we've gone through election day, President-elect Biden, litigation
22 lawsuits.

23 And, then, in writing the emails, you're still tracking what people are saying, right?
24 You're looking at what President Trump is saying; you're looking at what the campaign
25 surrogates are saying. Is that fair?

1 A Yes, we're still watching --

2 Q Right. So part of your job, to some degree, is to be aware of the news,
3 because you're writing about the news. Is that fair?

4 A Yeah, we're writing about what we're seeing.

5 Q Yeah.

6 So I'm just trying to get the timeline right. So we have a whole lot of lawsuits.

7 And I understand from your prior interview that you believed that the -- and from this
8 interview -- you believed that the President's legal team was making arguments and the
9 campaign wasn't over, and that was your belief in November. Is that fair?

10 A Yeah. To my knowledge, like you said, lawsuits are being filed, recounts.
11 So, yes, I'm under the impression that it is not over.

12 Q Yeah. So did there come a time when you thought it was over?

13 A Probably not until January 6th.

14 Q Okay. And why not till January 6th?

15 A I mean, the results were certified on that day, and then, I mean, we stopped
16 fundraising, which was more of a result of what happened at the Capitol, not necessarily
17 because the results were certified.

18 Q Well, I guess, just to interrupt you, I'm asking, when you say January 6th --

19 A Uh-huh.

20 Q -- like, there's a little bit of, like, the ob- -- it was over because, like, it was
21 over.

22 A Right.

23 Q I think, at that point, it was over.

24 A Uh-huh.

25 Q But, prior to January 6th, did you have the thought then that this will not be

1 decided until this date of the 6th?

2 A I mean, things are not looking good, obviously. I thought that we did not
3 have a good chance that President Trump would remain the President of the United
4 States, but, at this point, my understanding is that there are still legal efforts to, you
5 know, fight the claims.

6 Q Yeah.

7 A And so I did not think it was over-over. It did not look good.

8 Q So, you know, throughout November and December, President Trump loses,
9 I think, dozens of lawsuits, right? And I think, to present day, of the 62 lawsuits filed,
10 he's lost 61 of them, and the single lawsuit that his campaign won was about -- had no
11 relevance to the Pennsylvania outcome. It was a pretty limited decision.

12 So that's my characterization, but we're going to -- did you have any knowledge
13 about the win-loss record in real-time? Did you have a sense of whether these efforts
14 were successful or not in November-December?

15 A Not that I can remember.

16 Q So is it fair to say you just had the idea that there was litigation, not about
17 the, kind of, validity or strength or success of that litigation, but more so just the
18 existence of it?

19 A I mean, the President and the statements coming out -- I mean, the lawyers,
20 they all sounded extremely confident. And I don't know what was going on behind the
21 screens, but, to me, I'm hearing people talk very confidently about the efforts they're
22 doing and that they think they'll be successful, so I felt confident that it was not over.

23 Q And were you aware that those efforts were again and again resulting in
24 legal losses?

25 A I don't remember being aware of it.

1 Q Okay. Did you look it up?

2 A I don't remember looking it up.

3 Q Okay. Was it relevant for the fundraising efforts, how this was turning out?

4 And understanding that this isn't your job, right? You're not a lawyer for the
5 campaign. It isn't your job to, like -- but, when you're writing these emails, was the
6 strength of the President's current posture relevant for what you wrote in your
7 fundraising emails?

8 A What do you mean?

9 Q Meaning, you were more confident on November 3rd than you were on
10 December 20th, fair?

11 A Yes, I think that's fair to say.

12 Q And by December 20th, things looked bad for President Trump remaining in
13 power. Is that fair?

14 A It did not look good.

15 Q It looked bad. Is that fair? Or is it not fair to say that?

16 A I mean, again, I did not think it was over. It looked unlikely that he would
17 remain President.

18 Q Okay. Did that have any impact in the tone or the substance of the emails
19 you were writing?

20 A I don't remember it changing. We weren't sending out as high a volume in
21 December that we were in November, but I don't remember the tone changing.

22 Q Uh-huh.

23 During December, were you aware of December 14th being the date the States
24 certified the election results?

25 A I remember the States had to certify the results. I did not know it was that

1 day.

2 Q Okay. Is it you don't know that date today or -- is it fair to say that, at that
3 time, if you were looking at the news -- without knowing, perhaps, what day it was right
4 now -- if you were keeping track of the news at that time, you likely would've been aware
5 when it happened then?

6 A It's very possible I was aware of the day at the time and that I just don't
7 remember now.

8 Q Yeah.

9 So, if we look at -- so some folks have taken the position, right, that
10 December 14th was a day that mattered in this process, in ending this process.

11 A Uh-huh.

12 Q You mentioned January 6th being a day that you thought it would end.
13 Why not December 14th? Like, why do you say the 6th as opposed to December 14th?

14 A I mean, I don't exactly -- I'm not super-familiar with election law. I know,
15 like you said, the States had to certify it and then it was certified in Congress. I don't
16 know, I mean, I guess, to me, it's like, why do you have both if they both don't matter,
17 you know?

18 Q Uh-huh.

19 A Like, clearly, you need them both for it to be totally certified, is my
20 impression.

21 Q Yeah.

22 So, when we get to late December, after the States have certified President
23 Biden's win, those emails that were drafted at that point, did you still believe -- I guess
24 what I'm trying to understand there is, by the time you get to December 20th, President
25 Trump has lost basically every -- he's lost every lawsuit since the Pennsylvania one, which

1 I think was November 4th. Every other lawsuit he's lost.

2 When you're drafting these emails, is all that matters to you the fact that folks are
3 telling you -- people that you trust are telling you that this is alive? Or are you, yourself,
4 deciding it?

5 Like, you know, take me there. Were you having any kind of concern that, like,
6 why am I writing this or not writing this, or has the process has played out? Or was that
7 not relevant?

8 A I mean, in December, I don't quite remember what we were writing about.
9 I know some content --

10 Q Yeah. Let me show you.

11 A Okay.

12 Q So if you go to exhibit 14 --

13 A Okay.

14 Q -- this is the subject line. It says, "Donald Trump: We're taking this to the
15 Supreme Court. The fight isn't over."

16 And then the email goes, "Breaking: Trump Campaign Taking Constitutional
17 Fight to Supreme Court." It talks about filing a petition for a writ related to
18 Pennsylvania's supreme court.

19 And at the bottom of the email, it says, "The Democrats are trying to get away
20 with STEALING this Election." Do you see that?

21 A Yes, I see that.

22 Q So, first, the fact that that phraseology seems to be repeated so much, is it
23 fair to say that you thought that was effective phrasing, if we see it repeated again and
24 again? Because that's kind of how the process works; you repeat what works?

25 A On average, yes, you repeat things that do well. I don't remember, like,

1 anyone having a conversation on if we should be using this or --

2 Mr. Steggerda. Let me ask a foundational question. He's getting into the
3 late-December timeframe.

4 Ms. Allred. Uh-huh.

5 Mr. Steggerda. You testified earlier today about the sources of your information
6 for the content of your messaging. By December, I think you just said you thought it
7 was looking worse, or you said something like that.

8 But, in terms of the source of your messaging, I guess as reflected in things like
9 this that were in late December, early January, were you still using the same sources, or
10 were you using different sources? I mean, where was the content coming from in this
11 timeframe?

12 Ms. Allred. Yeah, we would've continued, you know, following the message of
13 President Trump and his lawyers and, you know, the statements.

14 BY [REDACTED] :

15 Q Yeah. At this point -- so this is December 22nd. Understanding this email
16 came from President Trump and, right, this is meant to capture his wording, his essence,
17 his messaging -- correct?

18 A Yes, it should capture his voice.

19 Q Yeah. And is it fair to say that you would've kept pushing at that voice as
20 long as he kept saying what he was saying?

21 A I mean, I would never knowingly put something in writing that I did not
22 believe to be true. So, yes, as long as the President is saying things and I believe that he
23 believes what he's saying and I'm seeing it reiterated by his lawyers' statements, then,
24 yes, I would continue using what he is saying.

25 Q And when you say that you wouldn't put out something that you don't

1 personally believe, you mean that if President Trump said something, that, to you, was
2 enough basis to believe it? Is that fair?

3 A Based on him saying it, his lawyers saying it, it coming out in statements and
4 receiving approval, yes, that was enough for me, because I also believed it.

5 Q Well, I guess what I'm asking -- you said his lawyers. Did you need two
6 forms of verification --

7 A No.

8 Q -- or was President Trump enough?

9 A No, I guess I'm just saying it's not just President Trump saying these things;
10 his lawyers are also saying it.

11 Q Yeah, I understand. But here, right, you're not capturing the essence of his
12 lawyers' words; you're capturing his essence. It's an email from him. Right?

13 A Uh-huh.

14 Q Someone is supposed to read this email, and the "STEALING," you have the
15 President Trump "STEALING" in caps, right?

16 A Uh-huh.

17 Q What I'm asking is, was President Trump's saying it enough to write it?

18 Q Mr. Steggerda. I don't want to object, [REDACTED] but, I mean, she said -- you're
19 isolating it and you're trying to get her to admit that that was the only thing that she was
20 basing it on, but she's been here for 3 hours telling you that she experienced all of this
21 stuff for 2 months.

22 Q She had lawyers, she was aware of lawsuits, she heard the President, she
23 mentioned comms. Like, it was the totality of that stuff. So, to try to get her to admit
24 that, no, only the Trump stuff is the only thing she needed, she's -- that's different than
25 what you've just heard from her for 3 hours.

1 [REDACTED] No, no, no. That's not what I'm trying to say, so let me
2 clarify.

3 BY [REDACTED]:

4 Q You're looking at different sources to understand what's going on in the
5 news, correct?

6 A Yes.

7 Q Right. But when you see President Trump say something that you believe
8 that he believes --

9 A Uh-huh.

10 Q -- for you, is that enough for you to take that as something that's true?

11 A I mean, I think that's difficult to answer in this specific instance, because --

12 Q Let's generalize it.

13 A Like, if he said, "I like tacos," yes, I believe he likes tacos. But if he's talking
14 about something like this, where every single person -- or every single news source and
15 statement and press conference I'm watching is saying the exact same things that he's
16 saying, then that is enough for me in this particular instance.

17 I have not experienced something on this topic where he's the only one saying it
18 and no one else is backing him up, so it's hard for me to answer that question.

19 Q But you knew that, right, not every news source was saying that. We've
20 talked about that the so-called fake news said exactly the opposite.

21 A Sorry. By "source," I mean, like, his legal team, the RNC legal team, things
22 like that.

23 Q So you mean internal voices at the RNC/Trump campaign and his legal team.
24 And I think the only person you said was Rudy Giuliani. Was there anyone else?

25 A I mean, there were other people on his legal team. I --

1 Q You just don't recall anyone.

2 A -- don't know who they were.

3 Q Okay. So you look at those -- hey, sorry. [REDACTED] did you want to weigh
4 in?

5 [REDACTED] I did. I'm sorry. I just wanted to ask a clarifying question.

6 And apologies that I couldn't be there in person. I really appreciate you guys
7 coming in.

8 But, I guess, we're not trying to trick you or confuse you, but what we're trying to
9 kind of somehow get a sense of is: After December 14th, everybody is conceding.
10 Everybody is saying the lawsuits have lost. Mitch McConnell goes on television and says
11 that the transfer of power -- like, this is happening.

12 So, at December 14th, there aren't very many Republicans, there aren't very many
13 real lawyers -- nobody but the Rudy Giulianis of the world and the "unleash the Krakens"
14 of the world are running around saying that this is a stolen election.

15 So what we're trying to get a feel for is, after that December 14th date up till
16 January 6th, where were you guys getting this, that you think it's true, that you think it's
17 right?

18 And we're not trying to make you say "the President," but there were a very small
19 number of people who were still saying it, and so that's the group that we're trying to get
20 from you. Because everything else was saying it's over, he lost.

21 Like, that's what we're trying to get at. It's not meant to trick you. It's really
22 trying to tease out, after December 14th, where are you guys getting this stuff?

23 Does that make sense?

24 Ms. Allred. Yes, that -- I hear you. I understand what you're saying. But, from
25 what I remember -- and this is, like, a crazy 60 days for me -- I don't remember the people

1 I was looking to for, you know, confirmation in my mind that it was true -- the President,
2 his family, his legal team -- I don't remember those people wavering. From what I know,
3 they were very consistent.

4 [REDACTED] And that's super-helpful. Because if that's the circle that this
5 fundraising team was looking at at that point in time, that's what we're asking.

6 So, like, what you just said, super-helpful. We're just trying to figure out, who's
7 the crowd left on December 14th that is unwavering that you are gathering it from?
8 And so that is very helpful.

9 [REDACTED] And we're going to try to wrap up shortly. I think
10 we're -- if we can keep going just a bit further, Todd. I think we'll --

11 Mr. Steggerda. Yeah, yeah, yeah. She's -- we've tried to make --

12 BY [REDACTED]:

13 Q Exhibit 16, this example here, it's a same-day email, November 22nd. And
14 it says -- it's a poll, and it asks, do you want our country to be run by Joe Biden, who
15 would be an illegitimate President?

16 So we see this poll in the post-election period show up numerous times. And I
17 want to just confirm with you, based on what you testified to earlier, that if we see
18 something repeated like this, it's because the metrics supported that this was an effective
19 fundraising tool. Is that fair?

20 A I would -- I mean, as most things, I would -- or all things, I would say, if it was
21 repeatedly sent out, then, yes, it was probably effective. But true? At the time, this is
22 also where our minds are at; this is how we are thinking at this moment.

23 Q Do you recall this email, the illegitimate President poll?

24 A I recall the "illegitimate President" phrase. I don't remember this email
25 specifically.

1 Q And do you remember the "illegitimate President" phrasing being effective
2 fundraising?

3 A I mean, like I said, I don't remember us sending it multiple times, but if
4 you're saying we sent it multiple times and in fact we did, then I would assume that it was
5 effective.

6 Q I want to look at the next email, exhibit 17, which is a January 4th email from
7 Austin to Kevin, and it CC's you.

8 A Uh-huh.

9 Q And so it forwards a fundraising email from Ronna McDaniel. And I guess
10 Kevin says, "Hey Austin & Hanna -- 4 years ago we sent this email from Ronna saying
11 Trump asked her to run the RNC. With her reelection this Friday, it would be good to
12 FWD this email with a new one from her saying Trump asked her to continue to run the
13 RNC and maybe a membership renewal or something. This email raised about \$70k in
14 2016, which wasn't horrible back then. I just want to tie Ronna to Trump these next few
15 weeks to make sure we can use her as a sender these next two years. Let me know
16 thoughts/concerns."

17 And then Austin responds, "I like it. Can strengthen the main part of the email
18 with some of our newer tactics too. Maybe tie to GA last stance" -- I think he means
19 "chance" -- "to defend the senate and save america."

20 So do you recall this email?

21 A I don't remember it in particular, no.

22 Q Okay. Do you have an understanding as to what Kevin means when he says
23 he wants to "tie Ronna to Trump these next few weeks to make sure we can use her as
24 sender these next two years"?

25 A I couldn't say for certain what he means by "tie Ronna to Trump." I would

1 guess that it means, you know, he would want Ronna to be an ally to Trump.

2 Q And why would the next few weeks matter, in your experience?

3 A I believe at this point --

4 Q And I'll just note, the timing is, it's January 4th.

5 A And do you remember, is the runoff the next day?

6 Q The runoff is the next day, January 5th.

7 A I'm not sure what would be going on in the next weeks.

8 Mr. Steggerda. Are you aware of whether there was an RNC winter meeting at
9 this time? Do you have any idea of that?

10 Ms. Allred. Oh, I have no idea.

11 Mr. Steggerda. Do you have any idea if Ronna McDaniel was running to be chair
12 again of the RNC?

13 Ms. Allred. I do remember that Trump had asked her, I believe, to continue to
14 be chair.

15 Mr. Steggerda. But you don't know any details about that, right?

16 Ms. Allred. No. I didn't even know there was a winter meeting till now.

17 BY [REDACTED]:

18 Q And when Austin responds -- do you recall having any conversations with
19 Austin or Kevin about these topics, fundraising through Ronna, in January 2021?

20 A Not really. We used her as a sender from time to time, but I don't
21 remember specifically in January.

22 Q And then Austin mentions that we "can strengthen the main part of the
23 email with some of our newer tactics."

24 A Uh-huh.

25 Q Do you know what he's referencing when he says "newer tactics"?

1 A It could've been anything as simple as, like, an "impact" language.

2 Q But so, what would've been newer? Because the "impact" has been
3 around -- was used a good bit earlier than that. Do you remember anything that
4 could've been newer, or --

5 A Well, I think he meant because this -- I would guess that this email was sent
6 in 2016 --

7 Q Uh-huh.

8 A -- and it doesn't look like there is "impact" or "matching" language. So,
9 compared to 2016, that would be a newer tactic.

1

2 [2:07 p.m.]

3 BY [REDACTED] :

4 Q Got you. That's helpful. That's helpful.

5 So here we are on January 4th. Did you know, was January 6th -- when did
6 January 6th enter your mind as a day of significance, if you can recall?

7 A In terms of, like, certifying the election, we had sent, I believe, a few emails
8 out leading up to January 6th about Vice President Pence was supposed to be there and
9 what have you.

10 Q When you say "what have you," what is the "have you"?

11 A Oh, so I just don't exactly know logically how it works for certifying an
12 election. I know he was supposed to be there. I don't know what was going to, like,
13 happen. Like, I don't know what he actually is supposed to do to certify an election.

14 Q What did you understand the result of the thing he was supposed to do or --

15 Mr. Steggerda. At the time --

16 [REDACTED] At the time.

17 Mr. Steggerda. -- what do you think you knew about that?

18 Ms. Allred. Again, I don't exactly know how it works. My understanding is that
19 he has some authority to either certify the election or not certify the election.

20 BY [REDACTED] :

21 Q Okay. So were you aware -- so did you become aware of January 6th just
22 through your job, like, folks -- or did you, like -- like, tell me more. Like, how did
23 you -- was it just paying attention to the news, but then Trump was talking about
24 January 6th, and then it became a thing in your head, or --

25 A I mean, in terms of, like, again, this is my first Presidential election. I have

1 never been involved before. I actually had no idea you had to certify an election.

2 So in terms of the certification being on January 6th, that's the extent of why I
3 knew what January 6th was. But I had never heard about an election certification prior
4 to this election.

5 Q Did the decision to start -- because since that's a new concept to you,
6 January 6th -- did the decision to fundraise off January 6th come from you or come from
7 Austin?

8 A In terms of certifying the election?

9 Q Anything related to certifying the election or the events of January 6th, not
10 the attack but the certification, did that, coming with fundraising emails, begin with you
11 or begin with Austin?

12 A Justin -- so all January 6th is to me at this point is the election certification.
13 Again, if I had received direction, it would've come from Austin. I imagine I did receive
14 direction because, like I said, I had no idea that you had to certify the results.

15 Q Yeah. So we see that on January 6th there are numerous emails and texts
16 that go out that day.

17 Is it fair to say that for you all, for fundraising purpose, that January 6th was a day
18 of significance? I mean, there are multiple days -- multiple emails going out on one
19 topic which seems to indicate that the fundraising team thinks it's an important topic that
20 people care about, because you donate about what you care about, right?

21 A Uh-huh.

22 Q So tell us about those conversations that you recall about making
23 January 6th a fundraising focus.

24 A I think it did, from what I remember, seem like a fundraising opportunity
25 because of the certification. I think a lot of people around the country were really

1 wondering what Mike Pence was going to do. Was he going to certify the election or
2 not? I think a lot of people were invested in what was happening.

3 Q Did you have a view?

4 A I mean, again, this was the first time I had heard about it. And I don't think
5 it's ever not happened that the results have been certified. I mean, I was kind of
6 wondering what was going to happen. Then, depending on what happened, like, what
7 were we going to do? I had no idea what was going to happen.

8 Q So do you remember any of it -- so let me show you the next exhibit.

9 Exhibit 18 shows you the subject line of an email from January 6th, and it says, "100
10 Members of Congress. Join them in the FIGHT to DEFEND the Election."

11 And then the email on exhibit 19 is the body of that email, and it says, "Friend, the
12 Vice President is right. TODAY will be a crucial milestone in the months-long effort to
13 DEFEND Election integrity. Over 100 Members of Congress plan to object to the Election
14 results, because they share the concerns of millions of Americans about voting
15 irregularities. This is our last line of defense." And it cites it to President Trump and
16 Vice President Pence.

17 So do you recall this email or an email like this?

18 A Again, not specifically, but, yes, I remember we wrote emails on the topic of
19 the election certification.

20 Q Do you recall -- because, you know, there's -- did you follow
21 President -- excuse me -- Vice President Trump's [sic] position leading into the 6th?

22 A I remember, from what I know, that he did not want the Vice President to
23 certify the results.

24 Q Okay. No, what I'm asking --

25 Mr. Steggerda. He didn't, yeah.

1

2 BY [REDACTED]:

3 Q There's public reporting, right, that Mike Pence -- as in here, this is
4 attributing a statement to kind of, like, Mike Pence's position in a sense.

5 A Right.

6 Q Was that a thing you recall looking up or getting a sense, like, where is that
7 coming from?

8 A I mean, we -- it looks like we included a screenshot of a tweet that's directly
9 quoting the Vice President where he says, "I promise you, come this Wednesday," which
10 was January 6th, "we will have our day in Congress." So to me, that alluded to people
11 who support Mike Pence and Vice President Trump [sic] will be happy with whatever
12 decision, whatever he does.

13 Q Did you -- who would've -- because at this point, January 6th, so that's how
14 the email is written. This email had to have been written between -- on January 4th or
15 5th at the outer limit. I guess it could be read the day of the 6th. Who was writing
16 emails at that time?

17 A At that point, it's myself and Alex Murglin are writing emails.

18 Q So it would've been Alex Murglin or you that would've done the first draft of
19 any January 6th email?

20 A I mean, any email that went out on the 6th, yes, one of us would've written
21 it.

22 Q Okay. So there's three emails here about the 6th --

23 A Okay.

24 Q -- that you or Alex Murglin would've been involved in. Do you recall writing
25 emails about the 6th?

1 A I mean, in relation to the election certification, yes, I remember we wrote
2 emails on it.

3 Q Okay. So we have -- and then just out of curiosity, when you hear Defend
4 America Fund, do you think you're raising money for -- like, what do you think you're
5 raising money for at this point, the day of the 6th?

6 A I don't remember talking about it. Again, this entire time post-election I'm
7 under the interpretation that we are still working to raise money for the legal fund.

8 Q But at this point, right, you said this is the day you think it's all over. So I'm
9 just kind of curious, just from a fundraising perspective, is that a question that's like -- or
10 is the answer that it doesn't matter? Like, your job was to fundraise? Because it
11 sounds like you were motivated, at least in your head, regarding the election litigation.

12 A Right.

13 Q But here, right, you've told us that this is a day you thought was the day that
14 mattered, like, D-Day in a sense.

15 A Right.

16 Q So what did you think you were fundraising for?

17 A I mean, because we didn't know what was going to happen, I didn't know
18 what Mike Pence was going to do. For all I knew, he wasn't going to certify and the legal
19 efforts were going to continue. Or, I mean, again, from what I know, even if it was
20 certified, but I don't think that all of a sudden just meant everyone was going to drop
21 their lawsuits.

22 So for me, I mean, ongoing legal efforts were still happening even regardless of
23 what was going to happen.

24 Q So in a sense, the 6th wasn't like the D-Day?

25 A I mean, once it happened and the results were certified, then I was, like,

1 okay, maybe it is over.

2 Q Well, I guess --

3 A But leading up until then, I wasn't thinking in my mind, like, this is my last
4 day of work, you know.

5 Q Okay. I get that. But I'm saying the counterfactual, we had an attack, so I
6 think --

7 A Right.

8 Q -- the attack, plus certification is that -- what I'm trying to get a sense, like,
9 leading into the 6th, it sounds like the 6th wasn't some kind of special D-Day. It
10 sounded like even after the 6th -- if the 6th had gone off without violence, either way
11 there would've been justification for fundraising?

12 A I mean, you fundraise whether or not you have an election that year.

13 Q Yeah.

14 A So, yes, there's always justification to fundraise.

15 Q But even justification to fundraise off litigation, because either way, it
16 sounds like, if it had been certified, then there's litigation. If it's not certified, there's
17 litigation. So there's always a basis to fundraise.

18 A Right. And I guess from my point of view, you know, I was an RNC
19 employee. I did not think that we would be working for the joint fundraising committee
20 or TMAGAC forever. Eventually I was thinking, okay, I'm going back to the RNC and I'm
21 going to fundraise just for the RNC.

22 Q Yeah, okay. Let's quickly go to the next email, December -- it's a December
23 20th. You have a subject that says "Defend America Fund. We have the truth."

24 So, again, that's one of those funds we talked about that was an effective
25 marketing kind of tactic, right?

1 A Yes. And I just want to clarify to you, I believe based on how this was set
2 up, Defend America Fund would actually be, like, the sender name.

3 Q Okay. Got it.

4 A "We have the truth," subject line. "See inside," preview.

5 Q Thank you for clarifying.

6 A Sure.

7 Q So the next email says, it has "classified" on the top. Is that another
8 marketing thing that makes people feel important? Or why is that there?

9 A Yeah. That's just a graphic we added.

10 Q Okay. So it says, "Friend, today will be a historic day in our Nation's history.
11 Congress will either certify, or object to, the Election results."

12 Do you remember drafting an email like this?

13 A Not this specific one, but around this topic, yes, we wrote emails.

14 Q Okay. And then we have the next email, which is also on January 6th.
15 And it says, "Friend, we need to make sure you're aware of how important today is.
16 Congress will vote this afternoon to certify, or object to, the Election results." It says,
17 "Over 100 Members of Congress have vowed to fight for President Trump and OBJECT TO
18 the results because they are concerned about voting irregularities and potential fraud."

19 And it says, "President Trump," at the bottom, "and Vice President Pence are
20 really counting on your support right now."

21 Do you recall -- again, so these emails are going out, they're mentioning Vice
22 President Pence, and it's a little out of order, but I think this email, you look on page 23, it
23 has -- the subject line is "TODAY" in all caps, and it has, "This is our LAST CHANCE."

24 So is it fair to -- like, these emails read to me as, like, it's all coming down to today.
25 This day is a day that really, really, really matters.

1 A Yeah. I remember --

2 Q Is that fair?

3 A I remember it being an important day, yes.

4 Q And kind of bringing that energy to the fundraising emails, are those
5 directives that you would've gotten from Austin, or is it things that you would've -- you
6 just knew that this was important and a great fundraising opportunity?

7 A Again, I knew the election certification was on that day. That just seems
8 like something naturally, very similar to a debate day, that, yes, you would fundraise
9 around something like that.

10 Q Who sent out the email telling TMAGAC folks to stop fundraising?

11 A I don't remember getting an email. I believe we got some sort of message,
12 either on Microsoft Teams or Signal from Austin, saying pause everything.

13 Q Were you already aware of the attack by then?

14 A Yes, I was watching it on TV --

15 Q Okay.

16 A Or, I mean, I think it was already happening by that point, but --

17 Mr. Steggerda. Did you go to Stop the Steal rally?

18 Ms. Allred. No. I was at my apartment.

19 Mr. Steggerda. Did you go to the Capitol on that day?

20 Ms. Allred. No.

21 Mr. Steggerda. Did you have any indication that there was going to be a violent
22 attack on the Capitol before it happened?

23 Ms. Allred. No.

24 Mr. Steggerda. Where were you when you saw the attack on the Capitol?

25 Mr. Allred. At my apartment.

1 Mr. Steggerda. What was your feeling when you saw that?

2 Ms. Allred. I was pretty shocked and surprised.

3 BY [REDACTED]:

4 Q Why do you think Austin said to stop, or whoever told you to stop
5 fundraising? Did you say Austin? I'm sorry, I didn't --

6 A I believe it was Austin, yes.

7 Q Okay.

8 A He would've made that call probably.

9 Q Why did you think he told you to stop?

10 A Like, what was his reasoning, in my opinion?

11 Q Yeah.

12 A I mean, anytime something like that happens, I mean -- I mean -- I mean, it
13 was shocking what was happening. I mean, anything like that, that would've happened,
14 we would've paused fundraising.

15 Q So let me ask you this. So after the election -- excuse me -- after the attack,
16 we go to January 7th, 8th, 9th, 10th. What are you doing on those days?

17 A Literally nothing. We're not working at all. We're just told to, like, wait to
18 hear on when to start again. We have no direction.

19 Q Okay. So there's public reporting that Salesforce stopped the RNC from
20 using its platforms to send out emails at that time. Did you know that?

21 A I remember hearing that we were having issues with Salesforce, like you
22 said. I could not tell you when it happened.

23 Q Who did you hear about those issues from?

24 A Most likely Austin or Kenny, Kenneth.

25 Q I'm sorry, who?

1 A Well, he goes by Kenny, but in the record, I think he's probably Kenny -- or
2 Kenneth. I call him Kenny.

3 Q Okay. And that's -- his last name is Mika, is it?

4 A Yeah. Sorry.

5 Q And you think both of them or one of them? Who did you think --

6 A I mean, I don't think it was like a FYI, this is happening. One of them most
7 likely said, like, "Oh, yeah, we can't send right now because of Salesforce." I don't know
8 who would've told me.

9 Q Yeah. And the -- you know, I'll say -- I'll summarize, but the Salesforce
10 public statement says that Salesforce didn't want its platform to be used in a
11 way -- talking about its marketing cloud, its email platform -- to be used in a way that
12 could kind of incite further political violence.

13 Were you aware that that was what they said or, like, the spirit of what they said,
14 like, what their concerns were?

15 A I remember hearing about that.

16 Q Okay. And did you hear about that, again, from Austin and Kenny?

17 A It would've been one of them that had shared that with me.

18 Q And what did they say about that?

19 A I remember them saying, "We're trying to work it out. We're trying to
20 figure it out."

21 Q What were your thoughts about Salesforce seemingly drawing the
22 connection between violence and the use of its email platform to send those TMAGAC
23 emails?

24 A What did I think about it?

25 Q Yeah.

1 A Let me back up real quick. Kenny at some point left the RNC, and it actually
2 might've been before January. I cannot remember.

3 Q Okay.

4 A But he did leave. So maybe -- I just want to clear that up.

5 So what did I think about Salesforce? I mean, I did not agree that the emails,
6 fundraising emails we were sending out, were inciting violence. I think I told you that
7 last time I saw you, that I don't think our copy and our fundraising as being -- is
8 responsible for what took place at the Capitol on January 6th.

9 Q Well, I'm asking you kind of a more -- I mean, I appreciate you saying that. I
10 don't think anyone is alleging that. But I'm asking you kind of a more precise question.

11 What Salesforce is saying, as I read the statement, is they don't want their email
12 platform to be in any way -- like, exacerbate or increase the chance of political violence.
13 They don't want it, as I read it, like, you know, don't want to get people excited and
14 enflamed.

15 A Uh-huh.

16 Q Like, they're drawing a connection between -- and this is not -- they didn't
17 say this part. This is what I'm inferring, right?

18 Political emails everywhere, as we talked about, are enflamed, and, you know,
19 people donate when they feel like something's on the line. They don't donate when
20 everything's fine in the world, right?

21 A Right.

22 Q When you learned about Salesforce saying that these TMAGAC emails, these
23 emails that we've been talking about today, that they thought if emails like this kept
24 going out it would be potentially dangerous for violence reasons, did you see no -- did you
25 think that was -- how would you characterize how you felt about that kind of connection?

1 A I was kind of frustrated. I mean, I never really used Salesforce, so it didn't,
2 like -- I mean, obviously we could not send emails, but it did not affect my day-to-day that
3 much because I wasn't on that platform.

4 Yeah, I was frustrated.

5 Q And when you say you weren't on that platform, the RNC, TMAGAC sent out
6 the blast emails on that platform, though, correct?

7 A Yes. I'm sure I had a login, but I do not know how to use the marketing
8 cloud. It's very confusing.

9 Q Yeah. So just to get your view again, finish your statement there. They
10 draw this connection between these emails and political violence. What's your
11 response to that?

12 A I mean, again, I'm frustrated. I don't think it's an accurate connection.
13 Obviously, I can't control what a company wants to do.

14 But I mean, yeah, it was frustrating. I don't think it was accurate. I don't think
15 that was -- you know, I didn't agree with it. But it wasn't also in my control, and that's
16 not something -- I wasn't the ones talking with Salesforce or figuring out how to make it
17 work. That wasn't my job.

18 Mr. Steggerda. In your role as the copywrite employee at the time, did you have
19 any intention whatsoever, as you led up to January 6th, that any of your copy was going
20 to incite violence on the Capitol?

21 Mr. Allred. No. Definitely not.

22 In the days after January 6th, if Austin hadn't paused
23 fundraising and Salesforce hadn't banned -- or temporarily banned the RNC, do you think
24 you would've drafted the same style copy as you had leading up to the 6th?

25 Ms. Allred. That's hard to guess. I was -- like, I've never been in that position,

1 so I really have no idea.

2 I mean, one could say, you know, I worked for the RNC. If the results had been
3 certified, who knows if the RNC would've continued working with TMAGAC. And if we
4 had just been working for the RNC, maybe we wouldn't have been using President
5 Trump's.

6 I had no idea what could happen. I mean, again, like, we never prepared
7 anything, no matter what happened at the election certification. So I have no idea what
8 kind of language we would've been using.

9 [REDACTED] Give me 1 minute, Todd.

10 Mr. Steggerda. Okay.

11 [REDACTED] And I guess on the other side of that coin, if
12 January 6th -- I know you said we don't know what would've happened or, you know,
13 we're not going to do too many counterfactuals, but --

14 Mr. Steggerda. A standing hypothetical objection, but I think on this one --

15 [REDACTED] Yeah, yeah.

16 Mr. Steggerda. -- we're close.

17 [REDACTED] Yeah.

18 Mr. Steggerda. So I'll let it go.

19 [REDACTED] If the attack hadn't happened, and whichever way things
20 would've gone, do you think it's fair to say that the fundraising efforts and marketing
21 tactics and kind of approach that you undertook would've remained the same?

22 Ms. Allred. If the attack had never happened?

23 [REDACTED] Yeah.

24 Ms. Allred. I don't know. I don't think it -- from what I'm aware, it was not the
25 intention of the RNC to be tied to -- if President Trump is no longer President and the

1 results -- and the attack never happened, I'm under the impression it was not the
2 intention for the RNC to remain part of the joint fundraising committee. So, I mean, I
3 imagine that would change things. So I don't think it would be fair to say.

4 Mr. Steggerda. As a matter of, like, the normal course, or what's your --

5 Ms. Allred. Yeah. I mean, who knows? Like, I have -- I don't think we
6 would've had the access to use surrogates we had, just the RNC, without the counterpart
7 of the campaign.

8 So I have no idea what copy would've looked like. I only worked for the RNC
9 when it was a part of the JFC, I believe. So I have no idea what it would've looked like.

10 [REDACTED] And are you basically suggesting that if President Trump
11 wasn't the candidate, the voice of the emails would change because that kind of --

12 Mr. Steggerda. I think what she's saying is that there wouldn't be a JFC --

13 [REDACTED] I understand that.

14 Mr. Steggerda. -- with the President of the United States on it.

15 [REDACTED] I understand that. But what I'm trying to clarify is
16 that -- the substance of what makes a successful fundraising email, right? Are you
17 suggesting that if President Trump were not the guiding star of the fundraising efforts, as
18 far as his image, that the substance of the emails would naturally change?

19 Mr. Allred. It's hard to guess. But, I mean, you also have to understand that if
20 there's not -- if President Trump's not the candidate and he -- just the way the RNC
21 works -- if he's not the candidate and we don't have a nominee, then the RNC
22 cannot -- what I understand -- publicly back a candidate.

23 So they cannot publicly be behind one person who could potentially run for
24 President. So it is my understanding that, yes, it would change because of that reason.

25 [REDACTED] Okay. Unless -- Todd, if you give me 2 seconds. Let me

1 just check.

2 All right. I think that is all we have. So the transcribed interview stands
3 adjourned.

4 [Discussion off the record.]

5 [REDACTED] Well, you know what, let's go back on the record one
6 second. Just add, we are adjourned subject to recall by the chair.

7 Mr. Steggerda. Can I just make a -- to the extent you need an official request
8 from me to review any transcript at the appropriate time, for later, obviously, discussion
9 with investigative counsel. You don't have to agree to that now, of course, but I want
10 the request on the record.

11 [REDACTED] Yeah. All right. Thank you all.

12 [Whereupon, at 2:31 p.m., the interview was concluded.]

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

7

8

9

10 Witness Name

11

12

13

14 Date

15