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

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11      DEPOSITION OF: JEFFREY LAWRENCE MORELOCK  
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15                                  Wednesday, January 26, 2022  
16  
17                                  Washington, D.C.  
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20                                  The deposition in the above matter was held via Webex, commencing at 1:04 p.m.  
21                                  Present: Representatives Lofgren and Murphy.

1        Appearances:

2

3

4        For the SELECT COMMITTEE TO INVESTIGATE

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

6

7        [REDACTED], INVESTIGATIVE COUNSEL

8        [REDACTED], RESEARCHER

9        [REDACTED], RESEARCHER

10      [REDACTED], INVESTIGATIVE COUNSEL

11      [REDACTED], INVESTIGATIVE COUNSEL

12      [REDACTED], PARLIAMENTARIAN

13      [REDACTED], INVESTIGATIVE COUNSEL

14      [REDACTED], INVESTIGATIVE COUNSEL

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17      For the WITNESS:

18

19      CHRISTOPHER RABBY

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2 [REDACTED]. Let's go on the record at 1:04.

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

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

8 The Witness. Jeffrey Lawrence Morelock, M-o-r-e-l-o-c-k.

9 [REDACTED]. Thank you, Mr. Morelock.

10 This will be a staff-led deposition, and members, of course, may choose to also ask  
11 questions.

12 In the room with you here today you have [REDACTED], investigative counsel;  
13 [REDACTED], investigative counsel. You have [REDACTED] investigative counsel;  
14 [REDACTED], investigative counsel; [REDACTED], investigative counsel. Let's see,  
15 we also have [REDACTED], parliamentarian. We do not have any members in the room  
16 at this time.

17 As individuals join, if they do join during this deposition, I'll be sure to introduce  
18 them for the record.

19 Before we begin, I'd also like to describe a few ground rules for you. We will  
20 follow the House deposition rules that were provided to your counsel previously.

21 Under the House deposition rules, counsel for other persons or government  
22 agencies may not attend, and you are permitted to have an attorney present.

23 I would like to note for the record what has been previously marked as exhibit 1 is  
24 the subpoena for Mr. Jeff Morelock, which is dated January 5th, 2022. You are here for  
25 this deposition pursuant to that subpoena.

1           So at this time, could counsel please state their name for the record.

2           Mr. Rabby. Christopher Rabby here on behalf of Mr. Morelock.

3           ██████████. Mr. Rabby, can you please spell your last name for us just to make  
4 sure we have it clear on the record?

5           Mr. Rabby. R-a-b-b-y.

6           ██████████. Thank you.

7           There is an official reporter transcribing the record of this deposition. Please  
8 wait until each question is completed before you begin your response, and we'll try to  
9 wait until your response is complete before we ask our questions. The stenographer  
10 cannot record nonverbal responses, such as shaking your head, so it is important that you  
11 answer each question with an audible verbal response.

12          We ask that you provide complete answers based on your best recollection. If  
13 the question is not clear, just ask one of us for clarification. And if you do not know the  
14 answer, please just simply say that you don't know the answer.

15          You may only refuse to answer a question to preserve a privilege recognized by  
16 the select committee. If you refuse to answer a question based on a privilege, staff may  
17 either proceed with the deposition or seek a ruling from the chairman on the objection.  
18 If the chairman overrules such an objection, you are required to answer the question.

19          I also, lastly, want to remind you that it is unlawful to deliberately provide false  
20 information to Congress for this interview. Providing false information could result in  
21 criminal penalties for perjury and/or false statements.

22          Do you understand that, Mr. Morelock?

23          The Witness. Yes, sir.

24          ██████████. Would you please stand and raise your right hand to be sworn.

25          The Reporter. Do you solemnly swear and affirm under the penalty of perjury

1 that the testimony you are about to give will be the truth, the whole truth, and nothing  
2 but the truth?

3 The Witness. Yes, I do.

4 [REDACTED]. Thank you, Mr. Morelock. You can have a seat.

5 Logistically, as we move throughout this afternoon, just let us know if you need  
6 any breaks or would like to discuss anything with your attorney. I know we're virtual.  
7 We'll operate as if we're in person. We'll go off camera, mute our mikes. You all can  
8 go talk and then come back whenever you're done with your conversation.

9 Also, if you need comfort breaks, like if we're going for a little too long, just let us  
10 know. We'll break for about 10 minutes -- 5 to 10 minutes to give everyone a chance to  
11 go do whatever they have to do.

12 There may be several people asking you questions today. If you don't  
13 understand a question, please simply ask one of us to repeat it. And we'll do our best to  
14 try to, you know, facilitate it so it's easy for you to know who's asking the questions so  
15 you can address them.

16 Does that all make sense, Mr. Morelock?

17 The Witness. Yes, sir.

18 EXAMINATION

19 BY [REDACTED]:

20 Q All right. We'll start with some easy stuff. Can you just tell us, for  
21 example, how old you are, what city and State you currently live in?

22 A I'm 55 years old. I live in Milton, Florida.

23 Q And what's the highest level of education that you obtained, Mr. Morelock?

24 A Some college and the police academy.

25 Q Thank you for highlighting the police academy. We'll get in there a little

1 later.

2 What is your current occupation?

3 A I'm a real estate agent.

4 Q And where are you a real estate agent? In Florida where you live?

5 A Yes, sir.

6 Q Okay. Does your real estate practice, does it cover the whole State or just  
7 certain regions?

8 A I'm licensed for the whole State, but I primarily work the Pensacola area.

9 Q And how long have you been a real estate agent?

10 A Off and on since 2006.

11 Q So you just mentioned some police academy. So I'm assuming you've been  
12 a police officer?

13 A Yes, sir.

14 Q When were you a police officer?

15 A My first academy was in 1988, I graduated. I worked for 8 or 9 years, took  
16 a break, worked private security. I had a private investigation and bodyguard company,  
17 and then also real estate.

18 Q Where did you go to the police academy? Was it like State police, local  
19 police?

20 A It was at, I guess, a community college in Bradenton, Florida.

21 Q And just give us a brief overview, I guess, of where you worked as a police  
22 officer, whether -- the locality or whether it was State or Federal.

23 A Most of it was for a city agency, Gulfport Police in Pinellas County, Florida.  
24 That's the Tampa Bay area. I worked there for about 9 years.

25 Then I got hired by the -- well, it was through a contract agency called DynCorp for

1       the State Department, United Nations, over in Kosovo. I spent 2 years over there as an  
2       international police officer.

3           When I got back, that's when I -- I didn't go right back into law enforcement. But  
4       in 2015 through, it was either 2017 or 2018, I don't remember for certain, I was a  
5       volunteer State Trooper for the Florida Highway Patrol. That required me to go to a  
6       320-hour, what they call an auxiliary officer. I didn't have full arrest powers, only -- you  
7       know, I could make arrests if I was in the presence of another trooper.

8           Q     That makes sense. And so with this -- this sounds like an interesting  
9       assignment over to Europe. Just, I guess, give us a little background about what duties  
10      you performed during that assignment over there.

11          A     Basically, United Nations was responsible for law enforcement, so I worked  
12       patrol. I did a little bit of war crimes investigation. I was on like a riot tactical response  
13       team, and then I was chief of operations over like 60 international officers for the last  
14       part of it.

15          Q     And where were you specifically?

16          A     Orahovac, Kosovo.

17          Q     Kosovo, got it.

18           And then the last part, you said you had kind of your own private PI or security  
19       company. Is that true?

20          A     Yes, sir. It's a -- in Florida it was a licensed private investigation. You're  
21       also allowed to do bodyguard work. I tended to gravitate more towards the bodyguard  
22       side of it.

23          Q     And just give us just, I guess, an overview of the types of folks you were  
24       providing bodyguard services for. Was it like politicians, celebrities, athletes?

25          A     Mainly celebrities and professional athletes, but there just really wasn't

1 much work there which, ultimately, is why I closed down.

2 Q Got it. And what were the years that you approximately were running this  
3 company?

4 A I don't remember off the top of my head. I don't remember.

5 Q Okay. Was it -- and this is just me just trying to ballpark it. Was it like  
6 after 2010, before 2010?

7 A Around 2010. Sorry.

8 Q Okay. So right in the middle. Okay.

9 A Yeah.

10 Q Thank you.

11 Were you also in the military? I didn't hear that, but were you also in the  
12 military?

13 A No, sir.

14 Q Okay. No reserve duty or anything like that?

15 A No, sir.

16 Q Okay. So how did you get involved with the Oath Keepers? Just tell us  
17 about that, how you first got involved and what you did in the organization.

18 A I either saw a video on the internet or read an article on the internet. It  
19 was during the -- I think during the riots when they were in Minneapolis. I don't know  
20 the exact date. But I saw somewhere that they were asking for volunteers to help do  
21 security, not just in Minneapolis, but in other places that were having trouble. So they  
22 were asking for volunteers, former law enforcement, military, that would be willing to  
23 volunteer to do security at businesses during protests that either turned into a riot or the  
24 potential for that was there.

25 Q So this was fairly recent then, around spring, summer of 2020 timeframe?

1           A    Correct.

2           Q    Gotcha. So walk us through, then, kind of the process of getting affiliated  
3         with the Oath Keepers. Like, for example, was there an application? Was there any  
4         kind of training? What was that process like?

5           A    Initially, it was -- again, I don't remember the dates, but there was protests  
6         and I guess some rioting in Louisville, Kentucky.

7           Q    Yep.

8           A    I think it was right around the Breonna Taylor shooting incident time. So  
9         that's the first contact I had with them, I think. I don't remember talking to them in the  
10       past. But I went on their website. There was a phone number to call. I left a  
11       message, you know, just telling them who I was, and they had asked for, you know, a  
12       brief -- I don't know -- resume or verbal resume anyway. So, you know, I told them what  
13       I just told you about my experience, and they called back and said, can you come up?

14          Q    I know this is probably the Hail Mary. Do you remember the phone  
15       number or where you got that phone number from that you called?

16          A    No, sir. They -- when they do those types of -- I don't know -- they call  
17       them call to actions, they usually have a different phone number for each one.

18          Q    You recall who you spoke with when they called you back?

19          A    No, sir.

20          Q    Okay. Was -- and so did you join a chapter immediately? Like, did you  
21       join a Florida chapter or was it just a national?

22          A    Not immediately. They were just taking volunteers. So I went up there,  
23       and I think I stayed 2 nights probably. And then, I don't know, within 2 or 3 weeks, I just  
24       joined. Basically to join the Oath Keepers, you just went on their website. I don't  
25       remember if there was an application or not. I think it's \$50 a year. So I paid dues for

1       1 year.

2           Q     Okay. And the Louisville example is good because it helps me understand  
3     probably how things were coordinated later on.

4           Did anyone, like, tell you where to be in Louisville? Like, was there, like, an ops  
5     plan before you went up there?

6           A     They didn't -- they wouldn't release any kind of ops plan before you got up  
7     there, so I just had to meet them. At first it was supposed to be in a hotel parking lot,  
8     then it changed to some industrial parking lot.

9           Q     Okay.

10          A     And then I met a whole group of them.

11          Q     And this was over the phone they gave you these directions --

12          A     Yes, sir.

13          Q     -- or was it over email?

14          A     Yes, it was over the phone.

15          Q     All right. And just for this Louisville example, approximately how many of  
16     you all were meeting, for example, in this parking lot before you all went to do your op?

17          A     Just guessing, probably 20 of us, maybe 30.

18          Q     You were from all over the country, not just from Florida?

19          A     Yes, sir.

20          Q     Got it. Because it was in response to like a national call to action?

21          A     Correct.

22          Q     Got it. Okay. So you said there were \$50 annual dues for the Oath  
23     Keepers?

24          A     Yes, sir.

25          Q     And are you still a member? It doesn't sound like it from just your -- by the

1 use of past tense.

2 A No, sir. Within 2 or 3 days of January 6th, I sent them a message on their  
3 website telling them to cancel my membership immediately.

4 Q We're probably jumping like a hundred steps ahead here, but why did you  
5 decide to leave after January 6th?

6 A I just didn't want to be affiliated with anyone that, you know, may or may  
7 not have done anything illegal.

8 [REDACTED] I'd like to note for the record that Ms. Zoe Lofgren has joined the  
9 deposition.

10 BY [REDACTED]:

11 Q So going back, have you held any leadership roles in the Oath Keepers?

12 A No, sir.

13 Q Or even locally in the Florida chapters?

14 A No, sir.

15 Q And did you go through any training after like this initial Louisville thing in  
16 response to the Breonna Taylor protest? Did you go through any training to become a  
17 member of the chapter in Florida or anything like that?

18 A No, sir.

19 Q Did you all ever have any like gun trainings or gun discussions or maybe go to  
20 the rifle range together, anything like that?

21 A There was some training in Florida, but I didn't attend any of it. A couple of  
22 times I had -- I don't know -- I guess you'd just call it target practice. Like in Louisiana,  
23 there was a big area where some of us were just shooting at targets, but it wasn't any  
24 kind of training.

25 Q Okay. And how were these train -- not trainings. I would say how was

1       it -- it sounds like it was like a meet-up, right, to go shoot, similar to like law enforcement  
2       and military folks. Is that about right?

3           A     No, sir. It was just, you know, before we would -- at least at that time it  
4       was just, you know, there was plenty of room, so it's like, hey, while we're waiting to go  
5       do something, let's just shoot. It wasn't let's meet here to shoot. It was we were  
6       there, there was a place where we could shoot, so some of us shot; some of us didn't.

7           Q     Just to like kill some time?

8           A     Exactly.

9           Q     Okay. And so there was no training regarding maneuvers or, for example,  
10      how to clear a building? I'm just thinking like traditional law enforcement or military  
11      trainings. Nothing like that?

12          A     I think -- I think that, you know, other chapters or that, you know, it might  
13      have happened in the Florida chapters, but I don't know who went. I didn't go. You  
14      know, I don't know where it was.

15          Q     And how were these trainings, the ones that you just kind of vaguely  
16      referenced, do you know how they were sent out to the group or how they were  
17      advertised to the group?

18          A     No, sir.

19          ██████████. Before I get into activities, is there anything -- does any other staff  
20      or Ms. Lofgren have any questions, any follow-up questions for Mr. Morelock?

21          Okay.

22          Oh, sorry. ██████████?

23          ██████████. Hi, Mr. Morelock. Are you familiar with any of the community  
24      preparedness teams or any of the community preparedness training?

25          The Witness. I heard that that was something that they were going to try to

1 start in Florida, but it never got started, at least not, you know, while I was a member.

2 [REDACTED] Got it. So you never participated in any of those trainings?

3 The Witness. No, sir.

4 [REDACTED] Got it. Thank you.

5 BY [REDACTED]:

6 Q Okay. So now I want to talk a little bit about like the types of events or  
7 activities that you all engaged in. I understand the Louisville example.

8 What events or activities -- or just explain to me what you did as an Oath Keeper  
9 while you were in for about that year timeframe?

10 A In the Louisville -- when we went to Louisville, the first night we basically  
11 stood on the roof of a pawn shop to make sure that nobody looted it.

12 The second night was -- across the street from that pawn shop, there was a gas  
13 station that they had closed up that, I guess -- I don't know -- days or a week before  
14 someone tried to set it on fire.

15 Q And during this Louisville example, were you all like working in coordination  
16 with local law enforcement? Like, were you working with them?

17 A Yes, sir. There were -- usually it was a former law enforcement officer,  
18 Oath Keeper, would be assigned as like a law enforcement liaison where he or she would  
19 contact the -- whatever agency had jurisdiction, usually their intelligence detectives.

20 Q So you were almost act -- you were acting -- and correct me if I'm wrong -- in  
21 concert with local law enforcement, almost as like a force supplement? Were you  
22 working with them? So it sounds like you were going where they --

23 A We were cooperating with them, yes, sir.

24 Q Oh, sorry. I was talking over you. What did you say?

25 A I said we would cooperate with them. Like, in Louisville, some Oath

1       Keepers saw some people setting a car on fire, so they contacted law enforcement. I  
2       think -- I think they were able to make an arrest on 2 or 3 people and put out the fire.

3           Q     Gotcha. Did you, as an Oath Keeper, provide personal security at any  
4       point? And I'm not talking about January 5th or 6th at this point. So let's actually go  
5       into like that summer of 2020, all the way up through like December, did you provide  
6       personal security at all?

7           A     I don't -- I don't think I became involved with them until September or  
8       October maybe. In November, they asked for volunteers to do personal security for, I  
9       think it was an attorney that was assigned as a poll watcher in Detroit. So I did personal  
10      security then. I did personal security for -- again, they asked for volunteers -- for Roger  
11      Stone when he was in the Tampa Bay area. That's where I'm from. That's where my  
12      family was, so, you know, I volunteered to go down there.

13           Q     So let's break that up. So the Detroit -- so this was around the general  
14      election time or during early voting?

15           A     It was, yes, I guess during the general election time because the person was  
16      a poll watcher.

17           Q     And was this another response to a call to action or was this coming through  
18      your chapter?

19           A     I think it might have been on a national chat, either through Signal -- they  
20      used a couple different apps. So I don't remember which one it was, but probably  
21      something like Signal.

22           Q     Okay. Is that how a lot of the opportunities came through was through  
23      Signal? Is that --

24           A     They would usually, from what I remember -- I don't know if it happened all  
25      the time, but usually it was like cross-posted.

1           Q     And what Signal channel, I guess, would you get this -- I've seen, for  
2 example, the Florida Signal chats. Which one would these opportunities come in  
3 through?

4           A     I don't remember. There was Florida. There was national. You know,  
5 people would add me to chats that I wouldn't even ask to be added to -- I don't  
6 know -- maybe just because of my experience, but I don't remember which one it was.

7           Q     And when you were in Detroit, do you recall working with Michael Green or  
8 a Michael Simmons? I believe his call sign is Whiplash?

9           A     Oh, Whipit.

10          Q     Whipit?

11          A     No. Whip, yes.

12          Q     Okay. So what was his involvement in the Detroit task?

13          A     He was doing personal security. I think he was, I guess you could call him  
14 the person that was in charge of that particular call to action.

15          Q     And was Ms. Kellye SoRelle there too?

16          A     Yes.

17          Q     What was the nature of her role being in Detroit?

18          A     That was the person that needed protection, I guess. If I remember  
19 correctly, it was -- someone was causing her or her group trouble. I think there was a  
20 car window broken at one point, so that's what they needed people for.

21          Q     How many of you all were providing security for Ms. SoRelle, if you recall,  
22 approximately?

23          A     In Detroit, there were two of -- just myself and Mike, I guess, is his name.

24          Q     Yes.

25          A     But they were in contact with some other people that could come if there

1 was a problem, but I don't remember who they were or what their names were.

2 Q And how many days did you provide this security with Mike for Ms. SoRelle?

3 A It lasted for, I think my part anyway, close to 10 days maybe.

4 Q And were you paid for this job?

5 A No. My -- they reimbursed me for expenses, like the rental car, gas, food,  
6 hotel.

7 Q Who reimbursed you? Was it Ms. SoRelle or the organization, the Oath  
8 Keepers?

9 A It was Ms. SoRelle.

10 [REDACTED] Okay. Chris, we may follow up with you just to see if there's any  
11 records of that after this, just to highlight that for you, okay?

12 Mr. Rabby. All right.

13 BY [REDACTED]:

14 Q And then going back, you said -- so it was Detroit and then Mr. Stone in  
15 Tampa, correct? That's another time you did personal security?

16 A It was in the Tampa Bay area. The actual city was Clearwater and, I believe,  
17 Pinellas Park.

18 Q Got it. And was this an event that Mr. Stone was attending or was it just --

19 A No. He was giving a speech at both of them.

20 Q Do you recall, was that before the election or after the election?

21 A After. It was in December.

22 Q Okay. And just walk us through that. Like, how did that opportunity to  
23 provide security for Mr. Stone come about, and then how long were you there, and then  
24 what did you do with Mr. Stone while you were with him?

25 A Again, it was one of the chats where they asked for volunteers. The first

1       one was at like a coffee shop called Conservative Grounds, I believe it was. So, basically,  
2       I kind of took it upon myself to do what they call an advance, is what I learned in my  
3       training, where you go out and look at the venue and just figure out routes to and from  
4       the hotel. So I did that.

5                  That night, I think I went with maybe two Oath Keepers to pick Roger Stone up at  
6       his hotel, transported him to the venue, and then, you know, stood by the stage while he  
7       gave his speech.

8                  Q     So you all were not providing -- I've heard the term -- I guess there's like  
9       event security and there's personal security. Were the Oath Keepers also doing event  
10      security for this?

11                 A     Yeah. There were -- I don't remember how many -- maybe five to eight of  
12      them around the stage. I don't know if you would call that event security or -- I don't  
13      think we labeled them at that point.

14                 Q     Do you recall who put on this event?

15                 A     No, I don't.

16                 Q     Okay. And so you got it through the chat. You picked up Mr. Stone.  
17      How long were you there with him? You might have said this. I'm sorry if I missed it.

18                 A     Just as long as it took him to give his speech, and then afterwards he did a  
19      book signing.

20                 Q     Okay. So you picked him up from the airport, you were with him during the  
21      speech, and then with him during the book signing?

22                 A     No, sir. We picked him up from the hotel.

23                 Q     Hotel. Okay. Got it, got it.

24                 Okay. One, I guess, overarching question I have. You mentioned that for Ms.  
25      SoRelle, that she had a window broken out or something of that nature. Why was

1 security necessary for Mr. Stone in the Tampa Bay area, for example?

2 A I don't know.

3 Q You don't know. Okay. There was no justification put in the Signal chats  
4 as to why you all had to provide personal security for these folks?

5 A Not that I remember.

6 Q Okay. And you don't recall who was coordinating, meeting up with, for  
7 example, Mr. Stone to provide personal security?

8 A The Florida leader was kind of overall in charge of it, Kelly Meggs.

9 Q All right.

10 A He wasn't there the first night, though.

11 Q Do you know if Mr. Meggs had a relationship with Mr. Stone at all? Like,  
12 did he know him personally?

13 A I don't know.

14 Q Do you know if anyone in the Florida chapter knew Mr. Stone personally?

15 A I don't know.

16 Q Was Mr. Green -- was Mike with you during this time providing security --

17 A No, sir.

18 Q -- of Mr. Stone? He wasn't? Okay.

19 A No, sir.

20 Q Do you recall who was with you? Like, you said there were like eight folks  
21 providing stage security, and you can --

22 A The first night Kelly Meggs' wife was there. I think her first name might be  
23 Connie, but I'm not sure. Their son was there. I don't remember his name. I think it  
24 was either the first night or the second night an Oath Keeper named Joe from the, I don't  
25 know, Sarasota area was there. There was another Oath Keeper, I don't remember his

1 name. Maybe two other ones.

2 Q Thank you. That's helpful.

3 So around this time period -- it sounds like this event was after what I'm about to  
4 highlight for you. But in November, a couple of days before the rallies in D.C. on  
5 November 14th, Mr. Stewart Rhodes told Alex Jones on Infowars that, quote, We have  
6 men already stationed outside of D.C. as a nuclear option in case they attempt to remove  
7 the President illegally, end quote, and that armed men were, in quotes, prepared to go in  
8 if the President calls us up, end quote.

9 He also said that Oath Keepers had been doing recon for the past week prior to  
10 the November 14th rally in Washington, D.C.

11 It doesn't sound like you went to D.C. for the November 14th rally. Is that fair?  
12 Is that correct?

13 A I don't know the dates. When we were doing the -- I don't know -- you call  
14 it the Kellye SoRelle call to action or detail, that was when I think there was a first, I think  
15 they called it a Million MAGA March or something like that. It was the first one.

16 Q Yep.

17 A We did go to that.

18 Q Okay. Well, tell us about that. How did you -- how did it come about you  
19 going to D.C.? What, I guess, jobs did you perform in D.C.? Just tell us about that.

20 A Again, I was just doing security for Ms. SoRelle. At that point, you know,  
21 there was all the COVID thing, so there really wasn't anything going on real estate wise.  
22 So I did have time, so, you know, I volunteered to go to D.C.

23 And it was just, again, where they walked with -- they being Kellye SoRelle -- I  
24 don't know where -- let's see. It was Kellye SoRelle, myself, Mike or Whip, and then  
25 there was another Oath Keeper that was kind of -- I don't know if he knew who Alex Jones

1 was, but somehow we ended up going on the march or the walk with Alex Jones, and  
2 Kellye SoRelle, for whatever reason, wanted to walk with the crowd. I advised against it  
3 because it's so many people, but, you know, nobody listened to me.

4 So, you know, we went on that march. And then we were staying at somebody's  
5 residence, I don't know who it was, in Virginia.

6 Q Okay. Was this march from Freedom Plaza over to the Supreme Court?

7 A Yes.

8 Q Okay. And was Mr. Rhodes not with you and Ms. SoRelle was, I guess,  
9 separated from Mr. Rhodes at this point?

10 A Yeah. During the march I don't know what Stewart was doing.

11 Q Okay. And, I guess, just walk us through like that day. Did you see any  
12 threats? Did you think there was going to be any type of danger?

13 A No, sir.

14 Q Okay.

15 A It was peaceful.

16 Q And when did you get into D.C.? Did you, for example, engage in any type  
17 of advance work, like you mentioned before, for this rally?

18 A No.

19 Q Okay. And did -- do you know if anyone on your team, like Mike, for  
20 example, engaging in any type of advance work?

21 A I don't think so.

22 Q Got it.

23 A Not that I know of.

24 Q And, approximately, how many Oath Keepers were there at this rally in  
25 November with you?

1           A    I don't know for sure.  20, 30.  I really don't know.

2           Q    And they were from all over the country again?

3           A    Yes, sir.

4           Q    And do you know anything about what we just -- what I just talked about  
5         with Stewart Rhodes saying about Oath Keepers planning to keep our men outside of D.C.  
6         in November?

7           A    No.

8           Q    Did you know anything about that?

9           A    No, sir.

10          Q    There weren't any armed men on the Virginia side where you all were  
11         staying?

12          A    Not that I -- I mean, there were Oath Keepers there in Virginia.  I don't  
13         remember seeing any guns.  Again, this was the first Million MAGA March I think it was  
14         called.

15          Q    Yep.

16          A    You know, I know I -- you know, I had a gun with me, and we took target  
17         practice.  Outside of this person's house, there's -- you know, on acreage in Virginia.  
18         But I don't -- I don't remember seeing where any armed people were stationed or  
19         organized or anything like that.

20          Q    And you don't remember what part of Virginia this was in?

21          A    It was an hour, maybe an hour's drive from D.C.  Which direction I couldn't  
22         tell you.

23          Q    Got it.

24          [REDACTED]   Does anyone have any follow-up to that, to the November rally?

25          BY [REDACTED]

1           Q    There was another rally in D.C. in December.  Did you attend this one as  
2       well?

3           A    No.  I think that was the second one.  But, no, I didn't go to that one.  It  
4       was right after -- there was an Atlanta one they asked me to go to too, but this  
5       was after -- after the first one there was something going on in Atlanta.  I just made an  
6       excuse to leave because I was -- just kind of wanted to separate myself from everybody.  
7       So I made up a story about having to go back to work and just kind of left and, you know,  
8       at that point was just going to kind of fade away.

9           Q    Sound like you'd been on the road with these folks for quite a bit, so just  
10      wanted an excuse to get away.  Is that fair?

11          A    Yes.

12          Q    Were you reimbursed for your travel and stuff to D.C.?

13          A    The first -- for the first one, yeah.  That's the reimbursement that Kellye  
14      SoRelle gave me.

15          Q    Okay.  So that reimbursement included Detroit and D.C.?

16          A    Yes, sir.

17          Q    Very good.  So I'm not talking about January again, so the same time  
18      period.  It sounds like you provided security for Ms. SoRelle and Mr. Stone.  I'm going  
19      to go through a few other names to see if you provided security for them, just to be clear.

20          A    Okay.

21          Q    Did you provide security for Mr. Ali Alexander --

22          A    Yes.

23          Q    When did you provide security for him?

24          A    Just January 5th and 6th.

25          Q    Okay.  So -- okay.  Just the January 5th and 6th timeframe?

1           A    Yes.

2           Q    What about Mr. Michael Flynn?

3           A    No.

4           Q    Okay. Mr. Alex Jones, did you provide it for him, or was he just kind of in  
5   the vicinity?

6           A    The first rally, he was in the vicinity, but we had nothing to do with his  
7   security.

8           Q    Did any other --

9           A    At least I didn't.

10          Q    Did any other Oath Keepers have anything to do with his security, that you  
11   know of?

12          A    Maybe the -- I think the guy's name was John. I think he was from Texas.  
13   I don't know if he was doing security for Alex Jones, but, you know, he was with that  
14   group when we met up with them, kind of right as the march started. Again, this was  
15   the first march.

16          Q    Got it, got it. Okay. What about Mr. Ed Martin?

17          A    No.

18          Q    Did you all provide any personal security or, I guess, walk with any  
19   congressional members while you were in the November rally in D.C.?

20          A    Not that I know of or remember.

21          Q    Okay. So let's put aside the Tampa Bay example. Were you involved in  
22   any other election-related protests or events where you provided security in Florida?

23          A    No, sir.

24          Q    Do you know a Mr. Stephen Brown? Are you familiar with him?

25          A    No, sir.

1 Q What about the Resource Media Group?

2 A No, sir.

3 Q Before January 2021, so before you provided the security for Mr. Ali  
4 Alexander, were you familiar with Stop the Steal?

5 A No, sir. I don't think so.

6 Q All right.

7 A I had to google who Ali Alexander was. I had to google who Roger Stone  
8 was. I've just never really been in politics.

9 Q That's actually where I was heading to next. I was going to ask, like, how  
10 politically active were you before, you know, this December-January of 2020-2021  
11 timeframe?

12 A Not very at all. I mean, I voted for Trump in the -- during the last election,  
13 but when he was first elected, I didn't vote. And I vaguely remember, maybe I voted for  
14 Bill Clinton back in the day, but that's it as far as I can remember.

15 Q So what led -- I know -- I heard about the George Floyd protest, and it  
16 sounds like the Breonna Taylor protest in Louisville kind of got you involved with the Oath  
17 Keepers. But what got you involved with wanting to provide security after the election?

18 A I just -- I like doing that. You know, if I could pick a job, you know, perhaps I  
19 should have -- instead of went into city law enforcement, went straight for the Secret  
20 Service or something, but I didn't have the college. But I like doing that type of thing.  
21 There wasn't a whole lot going on in real estate, and it was basically expense-paid trips to,  
22 you know, wherever they needed me.

23 Q Makes sense.

24 [REDACTED] Any followup from any staff or from Ms. Lofgren?

25 [REDACTED]?

1 BY [REDACTED] :

2 Q Hi, Mr. Morelock. When you were providing security at the couple of  
3 events that you mentioned, were you bringing your own equipment or was that being  
4 supplied to you?

5 A It wasn't equipment really. You know, I do have a concealed weapons and  
6 firearms license. I don't remember if I was carrying on those events or at those events  
7 or not. But, you know, I was -- during all of these events I insisted on me just wearing  
8 plain clothes.

9 Q Sure. So --

10 A Let me clarify. On the personal security details, I insisted on plain clothes.

11 Q Got it. And in the Louisville event, were you bringing your own equipment?

12 A The Louisville equipment -- or, yeah, the equipment for Louisville, they  
13 loaned me a bulletproof helmet, or they said it was bulletproof anyway, and then panels,  
14 ballistic panels for a vest. I had a vest with, I guess they call it a carrier, but I didn't have  
15 the panels.

16 Q Understood. Were the Oath Keeper supplying any other members of the  
17 team with weapons or other equipment?

18 A I don't know if they had supplied anybody with weapons, but they had an  
19 online equipment store where you could purchase, you know, different things, from  
20 bumper stickers to, you know, ballistic vests and helmets. You know, they did loan gear  
21 out.

22 At one point during the first D.C., I don't know, march or something, Stewart  
23 Rhodes offered me a ballistic helmet. I guess he ordered it for me, but I never took  
24 possession of it.

25 Q Got it. Do you happen to remember where the store was located, what the

1 website was?

2 A It was on the Oath Keepers website. I think there was a link to it.

3 Q Got it.

4 [REDACTED] Ms. Lofgren?

5 Ms. Lofgren. Just curious. Why did you insist on wearing regular clothes as  
6 opposed to some other kind of gear?

7 The Witness. It's -- there's really no need for all that stuff. You know, you don't  
8 want to present a -- I don't know if hostile is the right word, but, you know, some Oath  
9 Keepers believe that you should look macho and military like. But, you know, I -- and,  
10 again, going back to, you know, some of my training is you just wear normal clothes  
11 instead of drawing attention to yourself.

12 Ms. Lofgren. Thank you.

13 BY [REDACTED]:

14 Q Mr. Morelock, I have just a couple more questions.

15 So during the time between the election and January 6th, Stewart Rhodes was  
16 pretty vocal about, you know, what he thought happened during the election and what  
17 he thought needed to happen, including having Trump invoke the Insurrection Act and  
18 warning that, you know, there would be a bloody conflict if that didn't happen.

19 Were you familiar with those -- his rhetoric during that time?

20 A Yes. I heard the -- I don't know if it was the podcast, or whatever it was,  
21 and then he posted an open letter on the Oath Keepers website, asked everybody to read  
22 it. But, again, I didn't even know what the Insurrection Act was. I had to google that.

23 Q Sure. Did you have a reaction at the time to his rhetoric?

24 A Yes. That's when I decided to just kind of distance myself from them.

25 Q Understood. Did you talk to other Oath Keepers members about that

1 rhetoric?

2 A I vaguely remember talking to the old Florida leader, not Kelly Meggs, but  
3 another guy who stepped down. His name was Mike. I don't remember what his last  
4 name was. But, you know, I just told him, I said, Hey, I think I'm gonna, you know, either  
5 quit or distance myself. He said, That's fine. I don't blame you, you know, and then he  
6 eventually did the same.

7 [REDACTED] Understood. All right. I don't have any more questions.

8 Thanks, Marcus.

9 [REDACTED] Thank you.

10 BY [REDACTED]:

11 Q All right. So I want to hit on this quickly before we move on to the  
12 January 5th and 6th kind of events.

13 I believe you've been interviewed by the FBI or DOJ, so can you just let us know  
14 approximately when you were interviewed, if you can recall, and how many times?

15 The Witness. Do you have the dates of the --

16 [REDACTED] It can be approximate, like months, if you recall.

17 The Witness. July maybe.

18 Mr. Rabby. It was July 16, '21, Tallahassee.

19 [REDACTED]. Okay.

20 The Witness. That was the FBI interview.

21 [REDACTED]. And did you meet with the DOJ as well separately?

22 The Witness. Yes.

23 [REDACTED]. And when was that?

24 The Witness. I don't remember the date. We're checking.

25 [REDACTED]. No worries. Thank you.

1           Mr. Rabby. It was prior to September 15, the trip that he took --

2           The Witness. Actually, it was up in D.C.

3           Mr. Rabby. That's right. It was from -- it would have been around September  
4 the 15th.

5           ██████████. Okay. Thank you. That's helpful.

6           And did you provide materials, documents, or any evidence in addition to your  
7 interview?

8           The Witness. Yes.

9           ██████████ All right. And was it just one production? Do you recall?

10          The Witness. What do you mean by production?

11          Mr. Rabby. Meaning [inaudible] give it to them one time.

12          The Witness. Yes. Yes, one time.

13          BY ████████ :

14          Q     And did it include like text messages, emails, Signal chats, all of that?

15          A     No, sir. I didn't have any of that. When I went there, I gave the FBI, it was  
16 an itinerary -- I don't remember if it was a photograph of Ali Alexander's itinerary for  
17 January 5th and 6th; I think a photograph of an Oath Keeper; and like a Special Forces  
18 manual or something.

19          Q     Do you still have those materials with you that you gave them?

20          A     No, sir. I deleted them.

21          Q     You deleted them? Okay. Thank you.

22          So I know we've touched on some of this, but I do want to understand kind of the  
23 Florida chapter better because I think that will help us understand how January 5th and  
24 6th and you going up to D.C. came about.

25          And you have touched on some of this already, but can you walk me through like

1 what chapter you were in in Florida, how it was organized, just help me understand it?

2 A I was in the Florida chapter. There were subgroups. I guess I was in  
3 probably the Panhandle subgroup. Wasn't very active. I don't think there was more  
4 than maybe four or five of us up here. I don't recall anybody's name other than their  
5 handle or call sign, whatever you want to call it. One of them was Cat Daddy. The  
6 other ones I can't remember right now.

7 Q Is Cat Daddy Mr. Stone, Aaron Stone?

8 A Not -- you mean Roger Stone or --

9 Q No. I believe his name was Aaron Stone. But looking at --

10 A I don't know -- I don't know what his real name is.

11 Q Okay. So he was in the Panhandle area as well?

12 A I believe so. I'm not a hundred percent sure. Again, it was -- a lot of  
13 people would change their nicknames and things like that, so I just -- I've tried to forget  
14 all this stuff.

15 Q So it wasn't like the military where you get a call sign and it stuck with you  
16 for life. It wasn't like that at all?

17 A Correct.

18 Q Okay.

19 Mr. Rabby. There was a lot of Gators too.

20 The Witness. Yeah. And there was a lot of Gators. People used Gator this,  
21 Gator that.

22 BY [REDACTED]

23 Q We'll go through that in a little bit, and I'll go through a lot of these call signs.  
24 And if you remember who these individuals are, we'll go through it at that time.

25 So it sounds like you were in the Florida chapter, and you were in a subgroup in

1       the Panhandle for Florida. It's correct that Mr. Meggs, Kelly Meggs, ran the Florida  
2       chapter of Oath Keepers. Is that correct?

3           A     Correct.

4           Q     And were there like meetings? Were there like Zooms? How did you all  
5       communicate or learn updates from Mr. Meggs?

6           A     They would do conference calls on, again, one of the apps. I can't  
7       remember. We used several.

8           Q     Zello, for example?

9           A     I'm sorry, I couldn't hear you.

10          Q     Zello, for example?

11          A     One more time?

12          Q     Z-e-l-l-o, Zello?

13          A     Yeah, I think we used that, maybe WhatsApp and Signal maybe, or they  
14       would switch back and forth.

15          Q     And approximately how frequently were these meetings held? Was it like  
16       weekly, monthly or --

17          A     I think they were weekly, usually.

18          Q     How often would you attend the meetings?

19          A     If I wasn't doing anything, I would usually attend weekly, but I did miss.

20          Q     Of course. For life stuff, you missed a few.

21          A     Right.

22          Q     Do you know how many people, approximately, would be on each call?  
23       Were you able to see that?

24          A     No, I don't think so. Not that I remember.

25          Q     Was there like an email distro list where you could see approximately how

1 many people or who was in the Florida chapters?

2 A Not that I remember.

3 Q And did your Florida chapter report directly to the national, with Mr.  
4 Rhodes, or was there like a region above that?

5 A I don't know how that worked.

6 Q Speaking of Mr. Rhodes, what was, like, for example, your relationship or  
7 your chapter's relationship with him? Did you hear from him frequently? What was  
8 that like?

9 A He would pop into the -- each State's calls, I guess, frequently. There was a  
10 national call that he was usually on. I think that might have been weekly. I didn't  
11 attend all of those, but some of them.

12 Q Okay. What is your -- if you have it, do you have a current relationship with  
13 Mr. Rhodes? And what is it, if you do?

14 A Not a current relationship, no. When we were doing the Kellye SoRelle call  
15 to action, I drove him and Ms. SoRelle from, I think it was an Oath Keeper's house in  
16 North Carolina to D.C. So I spent, I don't know, 8, 10 hours in the car with him then.

17 You didn't ask about it, but we did meet -- let's see. I don't know, there's  
18 probably 10, 15 Oath Keepers from North Carolina and Florida that did security at an  
19 event called the Red Pill Expo. So they rented an Airbnb where everybody stayed, and  
20 Stewart was in the house for those 2 or 3 -- I think it was 3 days at Jekyll Island. So,  
21 yeah, I talked to him a little bit, but --

22 Q And, I guess, just give us an overview. What was his demeanor,  
23 personality, rhetoric like when you were talking to him when he's not putting stuff online,  
24 for example?

25 A Up until, you know, the whole Alex Jones thing, I mean, there really wasn't

1       much political talk or anything like that. It was mainly, you know, we've got to keep  
2       volunteering for security, you know, in case some of these protests get out of control.  
3       So, you know, he seemed kind of dedicated to that. You know, kind of anti-Antifa talk, I  
4       guess, but nothing about the elections or that kind of thing, that I remember anyway.

5           Q     Did the Alex Jones Infowars thing that you just mentioned, did that catch you  
6       off guard having kind of talked to Stewart Rhodes a little bit?

7           A     Yes, sir.

8           Q     Okay. And I guess I think I know why. I'm just going to ask you anyway  
9       and make sure. But why did it catch you off guard?

10          A     Well, one, I didn't know what an Insurrection Act was, but, you know, again,  
11       I really hadn't been into politics. And, you know, when I read up on the Insurrection Act,  
12       I didn't see how that could be a good thing for anybody.

13          Q     I want to ask too, while I have you, about the Oath Keeper organization, if  
14       you all had ever, for example, partnered or worked with -- I'm going to go through just a  
15       bunch of organizations. And just let me know if, to your knowledge, you all had ever  
16       partnered with them or worked with them.

17           The Proud Boys?

18          A     I don't know if there was anything official, but the first Million MAGA March  
19       or whatever it's called, they were also kind of surrounding -- they had like a group of their  
20       people that were surrounding Alex Jones. But as far as an official partnership or  
21       anything like that, not that I know of.

22          Q     So they were around. You didn't necessarily work with them, but they  
23       were just around some of the same events you were providing protection for?

24          A     Correct.

25          Q     Would you describe the working relationship as cordial, collegial? Like,

1 how would you describe that?

2 A I mean, I don't recall anyone having any problems with them.

3 Q Okay. Now, what about the Three Percenters?

4 A I've just heard of them. You know, at one point I looked into joining them  
5 but, you know, I decided not to, that I was just going to stick with the Oath Keepers.

6 Q So you were looking to possibly, I know possibly, join them in addition to the  
7 Oath Keeper membership?

8 A Correct, or instead of the Oath Keepers, but they weren't really doing  
9 anything.

10 Q I guess, what drew you to the Three Percenters?

11 A Actually, what drew me away from the Three Percenters was they weren't  
12 pro-law enforcement or pro-ex-law enforcement. I forgot who I contacted, but the  
13 person was like, well, we really don't trust ex-cops and we really don't want ex-cops in  
14 our ranks. So, you know, I didn't look any further.

15 Q Was that the Florida chapter of the Three Percenters that you had the call  
16 with?

17 A I don't remember. There's several, from what I've read, several different  
18 Three Percent organizations. They're not all the same.

19 Q Okay. And you don't remember like where you got the information from  
20 the website for the one that you called?

21 A Might have been Facebook, but I'm not sure.

22 Q Got it. Okay. What about Vets for Trump or Veterans to Keep America  
23 Great, any involvement with them?

24 A No, sir.

25 Q Latinos for Trump?

1           A    I've heard of them, but --

2           Q    Didn't work with them?

3           A    Correct.

4           Q    What about Women for America First?

5           A    I think I heard of them, but I don't remember working for them.

6           Q    How about --

7           A    I'm sorry. Let me correct something. The first Million MAGA March,  
8         there was a women's group where there was like three or four of their speakers that  
9         were kind of walking, you know, in conjunction with where, you know, Kellye SoRelle was  
10      and with the Alex Jones group. So I don't know which group they were from, though, or  
11      I don't remember. But there were three women, part of some women's group, but,  
12      again, I don't know what that name was or their names.

13         Q    That makes sense. What about Turning Point USA?

14         A    I don't think I've heard of them.

15         Q    Southern Patriot Council?

16         A    No.

17         Q    Mr. Nick Fuentes?

18         A    I don't know who that is, no.

19         Q    Mr. Patrick Casey, did you work with him at all?

20         A    No, sir.

21         Q    What about the Georgia Three Percent Security Force, did you work with  
22      them?

23         A    No, sir.

24         Q    American Patriot Council?

25         A    No.

1 Q American Phoenix Projects?

2 A No.

3 Q Okay. Thank you.

4 [REDACTED] Are there any others that I should cover that anyone had a  
5 question about?

6 [REDACTED]: I'll just add to the list with a couple more.

7 BY [REDACTED]:

8 Q The Michigan Militia?

9 A No, sir.

10 Q The Wolverine Militia?

11 A No, sir.

12 Q And Mr. Ryan Kelley from Michigan?

13 A No, it doesn't sound familiar.

14 Q All right. Thank you.

15 BY [REDACTED]:

16 Q Mr. Morelock, just a separate question. Earlier you had mentioned when  
17 you disaffiliated from the Oath Keepers that you spoke to somebody named Mike who  
18 shared some of your sentiments and then later also disaffiliated.

19 Who was that? Do you recall his last name?

20 A No, I don't. Before, I know he lived somewhere in the Jacksonville area.

21 He was the leader before Kelly Meggs took over, and I think Kelly Meggs took over when  
22 this Mike guy left.

23 Q Is it Ostrel or Ostel (ph), by any chance?

24 A I don't know.

25 Q Okay. And then do you recall anybody else or did you know anybody else

1       that also disaffiliated?

2           A     No, not that I know of, not that I remember anyway.

3           Q     Okay. Thank you.

4           ██████████ Hi, Mr. Morelock. I think I know the answer to this based on your  
5       answers to the questions about the other groups so far, but I just want to make sure it's  
6       on the record.

7           You don't remember Stewart Rhodes talking about any of those groups, especially  
8       in the immediate -- before January 6th, so like January 5th, January 4th?

9           The Witness. Not that I remember, no.

10          ██████████ That's what I figured, but thank you.

11          The Witness. Yes, sir.

12          BY █████:

13          Q     Okay. You touched on this as well, a little bit about the messaging. But  
14       let's think about the messaging in particular to election day.

15          So the results were coming in, and a couple of days later, Joe Biden was declared  
16       the winner. I guess, what was going through your mind at this point? Also, what was  
17       going through -- what was in the chatter of some of these Oath Keeper folks around this  
18       time period?

19          A     I don't really -- there was like open chats where they would socialize, but I  
20       didn't get into it to socialize and talk about politics or anything like that. So I pretty  
21       much stayed out of it. I wouldn't just spend time hanging out in the chat rooms. I  
22       remember some posts where people were unhappy with it. But, again, I just didn't pay  
23       much attention to it because I wasn't in it for, you know, political reasons.

24          Q     Right. So from what you did know, did you see anybody planning to do  
25       anything? Or what was -- from the little bit you might have read, what was the solution

1 or the next steps after President Biden was elected or declared the winner?

2 A I don't remember any plans or discussions where anybody was going to do  
3 anything. You know, if that had occurred, you know, I would have known that would  
4 have been illegal, so -- and a lot of people knew I was an ex-cop anyway. So, you know,  
5 there was the military side of the Oath Keepers -- or former military side of the Oath  
6 Keepers where they would keep more to themselves and then, you know, the ex-cops  
7 would kind of keep to themselves.

8 Q So there was even kind of, not division, but there was people that you had  
9 more in common within the Oath Keepers, whether it be ex-military or ex-law  
10 enforcement folks?

11 A Yeah. It seemed like the ex-military people were, I don't know, trusted  
12 with more, I guess.

13 Q Got it. What messaging after the election were you receiving from like the  
14 national level folks, like Mr. Stewart Rhodes?

15 A There were national -- you know, the weekly national calls. I started  
16 skipping some of them, though, at that point. So, you know, I just --

17 Q Why did you start skipping them?

18 A Because, you know, there were -- like I told you earlier, some people would  
19 talk about political stuff and, you know, I just wasn't interested in it.

20 Q I guess just overall what I'm thinking about, I hear you keep saying you're not  
21 interested in political stuff, and I believe that. Why did you continue to associate with  
22 the Oath Keepers in around this time period if you -- because it seemed like they were  
23 doing a lot of political speech at this time.

24 A Again, I like doing the security part of it. You know, it was a chance to  
25 basically take free trips, you know, so that's why.

1           Q     You said the free trips part for you personally, but can you explain why so  
2     many Oath Keepers would have wanted to come to D.C. for January 6th? Like, what  
3     was -- what were people saying that might have been a different motivation than you  
4     personally getting like a free trip, for example?

5           A     I don't know what they're -- you know, again, if I had gotten any wind of  
6     anybody that had any, I don't know, illegal plans or ill will or anything like that, you know,  
7     I wouldn't have went in the first place. But, you know, I didn't pay much attention to  
8     anybody else.

9           Q     I guess I'm not really thinking about it in terms of like illegal plans, for  
10   example. Were they upset? Were they mad? Was it a different type of feeling than,  
11   you know, pre-election?

12          A     Yeah. They were upset that Trump lost the election. You know, that was  
13   discussed, but --

14          Q     And was it openly discussed that, not just lost, was it discussed that it might  
15   have been stolen or that something was unfair, that the country was --

16          A     Yeah. There was discussion that it was stolen. Again, I don't know. I  
17   have no idea. I still don't even know exactly what the electoral college process is and all  
18   that. So I don't know.

19          Q     I've seen some messages in various Oath Keeper networks about a coming  
20   civil war. Did you hear anything about that before January 6th?

21          A     Yeah. People would talk about that, there was going to be another civil  
22   war, but I just dismissed that.

23          Q     I guess, why did you dismiss it? That seems like strong words.

24          A     Some of these guys, you know, it just -- they're just kind of old, grumpy guys  
25   that sit around on the couch and really didn't have anything to do but complain about

1 things is how I dismissed a lot of them.

2 Q Gotcha. Was it talk or did you actually see anybody like preparing for a  
3 possible civil war or --

4 A I didn't see anybody preparing.

5 Q Okay.

6 A Again, I didn't really -- you know, I didn't go to meetings or, you know, see  
7 anybody face-to-face or anything like that. So, you know, it was all over the chats.

8 Q So your face-to-face, I guess, interactions with other Oath Keepers pretty  
9 much occurred at events like Detroit and the November rally, things of that nature?

10 A Yes, sir.

1 [2:02 p.m.]

2 BY [REDACTED]:

3 Q And do you have any knowledge about the relationship between Oath  
4 Keepers, like, as an organization, and then public figures like Roger Stone and Alex Jones?  
5 I mean, was there a formal kind of relationship between the orgs and these individuals?

6 A I don't know how the Oath Keepers came to be asked to provide security for  
7 Roger Stone or Ali Alexander or -- I don't know how any of that worked.

8 Q I guess, just giving us, from being in the chats -- although I understand you  
9 may not have been as active, but -- what would be your best guess into how, like, these  
10 folks got connected with the organization? Would it have been, like, on a national level  
11 or chapter level?

12 A I don't want to guess and be wrong.

13 Q That's fine.

14 A I don't know.

15 Q That's fine.

16 A Maybe, you know, I don't know, maybe Alex Jones referred Stewart Rhodes,  
17 you know, after him being on the podcast or something. I don't know.

18 Q And were you ever tracking any elected or congressional Members  
19 coordinating with the Oath Keepers for any type of protection or security?

20 A No, I wasn't. I don't -- yeah, I don't know anything about that.

21 [REDACTED] Does any staff or Ms. Lofgren have any questions?

22 And I believe -- it looks like Ms. Lofgren has left the deposition, so does any staff  
23 have any followup questions about the messaging?

24 [REDACTED]?

25 [REDACTED]. Thank you.

1 BY [REDACTED]:

2 Q Hi, Mr. Morelock.

3 A Hello.

4 Q I was wondering about the messages after the election. You said you  
5 weren't participating because you weren't really interested in those conversations. But  
6 can you recall if and how those conversations were affected by President Trump's  
7 statements after his loss and after President Biden was declared the winner, whether his  
8 tweets or his written or oral statements?

9 A I don't remember anything about that, or not that I can recall. I don't  
10 exactly understand your question either.

11 Q So I guess my question would be whether people were reacting strongly to  
12 Trump's tweets, Trump's press conferences where he talked about the election loss on  
13 the forums.

14 A Okay, I understand. Yeah, I don't remember any reactions to any of  
15 Trump's tweets or anything like that. Not that I remember, not that I recall.

16 Q Okay, great. Thank you.

17 BY [REDACTED]:

18 Q I have a followup to that. In general, though, did elected officials' rhetoric  
19 about the election being stolen, did it have any influence on the Oath Keepers at all?

20 A I'm sure it made some of them mad. You know, they were angry with the  
21 results.

22 Q Oh, I -- not even mad. Did it confirm, for example, your thoughts that the  
23 election had been stolen?

24 A I've never thought --

25 Q Not you in specific. Sorry. I meant, like, "your" as in the organization.

1 A Not that I know of.

2 Q Okay.

3 [REDACTED]. Does that prompt any followup from you, [REDACTED]?

4 [REDACTED]. Just one.

5 BY [REDACTED]:

6 Q Was there a lot of conversation on the chat about specific allegations of  
7 fraud in various cities, like Atlanta, Philadelphia, Phoenix?

8 A Not that I remember. I know that Kellye SoRelle, I guess, what they  
9 thought -- or what she might have thought is something was going on in Detroit, but I  
10 really don't know specifics, as far as what she was investigating or monitoring or  
11 whatever.

12 Q Did she ever speak with you at any point about what she thought of the  
13 allegations? I know you don't know specifics, but generally?

14 A Well, when we were driving, you know, like, from Detroit to North Carolina I  
15 guess it was, you know, if she would have to make a phone call, she would ask me to  
16 stop, and then -- at a rest stop, gas station -- she would step out of the car and make the  
17 calls, you know. So I don't know.

18 Q Okay. Thanks very much.

19 BY [REDACTED]:

20 Q Did she tell you why she had to step out to make the call? Was it because  
21 she was doing, like, official privileged --

22 A When you're -- when you're, I guess you'd call it working that, I tried to be  
23 professional --

24 Q Yes.

25 A -- you know, based on the training that I've had. So you don't ask the

1 people you're protecting things like that, you know?

2 Q Understood. Understood. Almost be invisible. Is that fair to say?

3 A Yes. Yeah.

4 Q Okay.

5 So I have one more section I want to get through basically about communications  
6 and just identifying some of these Signal chats, and then we can take a quick break before  
7 we get into, like, January 5th and 6th. So just to give you a roadmap.

8 Are you aware of the Oath Keepers, or even the Florida chapter in specific, having  
9 contact lists or directories of members?

10 A Not that I know of. I don't know how that worked.

11 Q Gotcha.

12 You mentioned this a little bit, but when you were speaking or communicating  
13 with other Oath Keepers, I want to go through a list of ways that you communicated. I  
14 just want you to say, yes, we did, or, no, we did not talk through those means.

15 So, for example, did you all communicate via email?

16 A Yes.

17 Q Gotcha. But since then you have deleted those emails or they're no  
18 longer --

19 A Correct. Correct.

20 Q Okay. Was email a pretty frequent way of communicating with each other?

21 A No.

22 Q Got it. And kind of along the same line, was it on ProtonMail or was it,  
23 like --

24 A Yes, Proton.

25 Q Got it.

1           Text message? Did you all communicate via text message?

2           A     Yes, but usually through one of the apps, usually, like, Signal.

3           Q     Right. So, rather than just using, like, regular text message, you were using  
4     one of the encrypted messaging systems?

5           A     Correct.

6           Q     So Signal, I heard you say that. Were there any other encrypted messaging  
7     systems that you used?

8           A     I think we used WhatsApp. You mentioned Zelle [sic]; I think we used that.  
9     I don't remember if there was any others or not.

10          Q     Okay.

11          ██████████, ██████████, can we pull up exhibit 5? And we'll go to page 19.

12          BY ██████████:

13          Q     So, Mr. Morelock, this is, just to -- this is the "Oath Keeper Florida D.C. OP  
14     Jan 6" Signal chat. I just want to ask you if you know what this application is that's  
15     referenced on page 19.

16          A     Yes, I think I'm familiar with that.

17          Q     Okay. Let's see. Page 19 says -- once we get there. So it says, "My  
18     nephew is downloading the app." So it's said by Cobra Shelby. "My nephew is  
19     downloading the app. He has plates."

20          Do you see what I'm referring to right here?

21          Mr. Rabby. Could you enlarge that?

22          Mr. Morelock. I can't read it really.

23          ██████████ Thank you, ██████████.

24          The Witness. I don't remember that.

25          ██████████ Okay. I was just seeing if you recall what the app was that was

1 being downloaded. If not, that's fine.

2 The Witness. Yeah.

3 [REDACTED] Thank you, [REDACTED]. We can take that down.

4 BY [REDACTED]

5 Q And you said that you all used Zello at times as well?

6 A I think so.

7 Q And did you --

8 A I'm not 100 percent, but I think so.

9 Q Okay. And did you all use any other social media applications to  
10 communicate with each other?

11 A Not that I remember.

12 Q Okay.

13 So just to bring this, kind of, section to a close, if you were to just summarize for  
14 me the ways that you all communicated the most as Oath Keepers, what would that be?

15 A Probably Signal.

16 Q So there are a number of folks that were listed in the Oath Keepers  
17 indictments. And I understand -- look, I'm not trying to say that you had anything to do  
18 with this. I'm just trying to understand who these folks were within the big picture, if  
19 you knew who they were. You've already explained a few, but I want to go through  
20 them individually, just to get this again from you.

21 Mr. Kelly Meggs, who was he? Just summarize it for us.

22 A The Florida chapter leader.

23 Q And what was his involvement, for example, to your knowledge, with  
24 January 6th?

25 A He was in charge of, I don't know -- well, everybody from Florida. But I

1 think he was coordinating with, I don't know, probably 20 other Oath Keepers. And we  
2 would have to get into the January 6th day, but, you know, he was supposed to have a  
3 group of Oath Keepers that were going to meet myself, the one other Oath Keep- -- again,  
4 we'd have to go into January.

5 Q Yeah. Okay. But Mr. -- okay, that's a great summary for Mr. Kelly Meggs.

6 What about Mr. Kenneth Harrelson?

7 A I think -- I think that's Kenny from Florida. He's just an Oath Keeper from  
8 Florida. I don't know if he was in charge of anything on the 6th or not.

9 He might have been -- see, they also did a security detail for Roger Stone in Miami  
10 prior to the Tampa one that I didn't go on. I think Kenny might've -- or Kenneth, this  
11 person, might've been involved in that.

12 Q I believe this individual, Ms. Jessica Watkins, was in the Ohio chapter, so not  
13 in the Florida chapter, but did you know anything about her?

14 A I've heard of her. I think she was one of them that got arrested. I didn't  
15 know really who she was until after I read about the indictments or arrests or whatever it  
16 was.

17 Q Okay. I did see that she was added to your Oath Keeper Florida chat. Is  
18 there anything unusual about maybe adding someone from Ohio to a Florida Oath  
19 Keepers Signal chat?

20 A I don't know -- I think only, like, the leaders had the ability to add people to  
21 chats. I don't know how that worked. I didn't get into that. So I don't know anything  
22 about that.

23 Q And this chat -- I mean, I'll just be candid -- doesn't look like you're chatting  
24 very often in this chat, so that makes sense, what you're saying.

25 What about Mr. Joshua James?

1           A    Yeah, I know who that is.  He was, I think, from Alabama.  And I think he  
2 might've got assigned to the Roger Stone on January 5th and 6th, but I'm not sure.

3           Q    Had you seen him at any other previous events before?

4           A    I think he was at the first Million MAGA March.  Yeah, he was there  
5 and -- yeah.  I think we gave him a ride to a hotel or something.

6           Q    What was his general demeanor?  Like, was he, let's say, more political, for  
7 example, than you?  Or what was -- do you recall anything about him?

8           A    He seemed, I don't know, motivated, willing to help the Oath Keepers.  And  
9 this was, I think, prior to the election.  But, after the election, I remember some  
10 discussion about him being hotheaded or something, but I can't elaborate on it.  That's  
11 all I remember.

12          Q    What about Mr. Joseph Hackett?

13          A    I don't know who that is off the top of my head.  I do know the one Joe, but  
14 he was the -- I think he was a chiropractor, actually, from the Sarasota area.  That's the  
15 only Joe that I remember.

16          Q    Okay.  Was that the call sign person that had "medic" in it?

17          A    I don't know.

18          Q    Okay.  We'll get to that later anyways.

19          Mr. David Moerschel?

20          A    Doesn't sound familiar.

21          Q    Brian Ulrich?

22          A    Not that I know of.

23          Q    Thomas Caldwell?

24          A    Not that I can remember.

25          Q    And Mr. Edward Vallejo?

1 A Not that I remember.

2 Q Perfect.

3 There are also various Signal chats that we've become aware of. I'm just going to  
4 go through them, and let me know if you were a member of the group chats or whether  
5 it's something that you weren't.

6 Correct me if I'm wrong, but it seems like certain Oath Keepers were in certain  
7 chats but you all weren't in all the chats. Is that correct?

8 A Correct. Correct.

9 Q Okay.

10 [REDACTED]. So, [REDACTED] can we pull up exhibit -- actually, you don't need to pull  
11 it up.

12 BY [REDACTED]:

13 Q What about a "Leadership Intel Sharing Secure" Signal chat? Were you in  
14 that?

15 A Maybe. I don't remember.

16 Q Okay.

17 [REDACTED]. Can we pull up exhibit 3, [REDACTED]?

18 BY [REDACTED]:

19 Q This is the "Florida Oath Keeper Hangout." Were you in this chat?

20 A Probably.

21 Q Okay. Do you -- what's the difference between this "Florida Oath Keeper  
22 Hangout" versus the "D.C. OP," for example?

23 A Well, the "D.C. OP" was just for the D.C. OP, so I think that was more of  
24 their -- the social chat.

25 Q Got it. And was it normal for, like, Mr. Stewart Rhodes, for example, to pop

1 into the "Hangout" chat and send stuff to you all?

2 A Yes, occasionally, yeah. I don't know if "normal" is the correct term or not,  
3 but it happened.

4 Q Okay. It wasn't unusual --

5 A Correct.

6 Q -- is my question.

7 [REDACTED]. Thanks, [REDACTED].

8 BY [REDACTED]:

9 Q You weren't at the December 12th D.C. rally. So were you in the  
10 "December 12th Security Leadership" Signal chat?

11 A I don't know.

12 Q Okay. That's fine. If you don't know, it's fine.

13 Did you ever have the occasion to be in the "Oath Keepers of Georgia" Signal  
14 chat?

15 A I don't think so. Not that I remember.

16 Q All right.

17 The "D.C. OP," the "Florida D.C. OP for Jan 6," you were in that group chat,  
18 correct?

19 A Probably.

20 Q Okay. There was a generic "D.C. OP," so it was just "D.C. OP Jan 6, '21."  
21 Would you have been in that one probably as well?

22 A Maybe. I don't remember. Yeah.

23 Q There was another -- and, like I said, if you don't know, it's fine -- a "January  
24 5th-6th D.C. OP Intel Team." Does that ring a bell for you?

25 A I don't remember. There was always so many chats that it was just -- it was

1 just confusing.

2 Q I guess, why were there so many different chats? Do you know why?

3 A I don't know. I guess maybe to kind of compartmentalize different groups  
4 and functions and things.

5 Q Ms. SoRelle was in a group chat called "January 5-6 D.C. Oath Keeper VIP  
6 Chat." Were you in that one, too, or do you recall?

7 A I don't remember.

8 Q Okay.

9 And my last one is, do you recall a "D.C. Volunteer" Signal chat?

10 A I don't remember that either.

11 Q Okay.

12 And now I'm going to go through, I guess, individuals that I saw -- oh, sorry.

13 Were you also -- I meant to ask this, too. Were you a member of any of the Oath  
14 Keepers Zello channels for January 6th?

15 A I don't remember.

16 Q You don't remember? Okay. Were you using Zello on January 6th?

17 A I don't remember using it. I think I was using Signal. But, again, I just -- I  
18 don't remember.

19 Q Okay. Thank you.

20 And now I'm going to go through a lot of these call signs. Just let me know if you  
21 know who these individuals are. I'm going to shoot to you who I think it is. You can  
22 either confirm it or just say you don't know.

23 [REDACTED]. Can you pull up exhibit 5, [REDACTED]? And can we go to page 1?

24 Thanks.

25 BY [REDACTED]

1 Q So, if we scroll down a little bit, "Patriot Genx," is that Mr. Graydon Young?

2 A The call sign sounds familiar, but I don't remember. It might have been a  
3 guy that lives over on the east coast of Florida, but I don't remember for sure.

4 Q Did you know Mr. Graydon Young? Does that name ring a bell?

5 A The name doesn't, no.

6 Q Okay.

7 [REDACTED]. Can we go to page 5 of this, [REDACTED]?

8 BY [REDACTED]:

9 Q And if we scroll down a little bit on page 5, this will be a message -- there we  
10 go, right here. So it looks like Patriot Genx says, "If Trump wins we need to stay active  
11 and force follow through on purging of traitors."

12 I guess this is some of the rhetoric that we were talking about earlier and that  
13 we've been seeing in the chats. What did you take this to mean?

14 A I don't remember reading that.

15 Q Okay. Looking at it now -- it's January 3rd. It says, "If Trump wins we  
16 need to stay active and force follow through on purging of traitors." What does that  
17 mean? We're just trying to understand it, but help us -- help us with that.

18 A You would have to ask him. I don't know what that means or what he  
19 meant by it.

20 Q Okay.

21 [REDACTED]: Can we go up to page 1, [REDACTED]?

22 BY [REDACTED]:

23 Q And just let me know if you know who "Deplorable 1" is.

24 A No, I don't.

25 Q Still on page 1, what about "Jason"? Who is Jason?

1           A    I don't know.

2           Q    Was that Jason Dolan?

3           A    I don't know who that is.

4           Q    Got it.

5           Also on page 1, "Gray Gator 1," is that Kelly Meggs?

6           A    Kelly did have "Gator" in his call sign, but I don't remember exactly which  
7       one it was.

8           Q    Okay. So I know "Gator 1," in the indictment it said it was Kelly Meggs, but  
9       the "Gray" part -- I guess I was trying to figure out if that was the same person, to your  
10      understanding.

11          A    I don't know.

12          Q    Okay.

13          Going down to page 4, who is Jeremy Brown?

14          A    I think he had a "Gator" in his call sign too. But he was -- I know he was  
15      former military, over on the east coast.

16          Q    Was he considered, like, for example, a leader within the Florida chapter  
17      or --

18          A    I --

19          Q    -- just another member?

20          A    I think so. I don't -- not leader, but I think he was, like, former Special  
21      Forces, so, you know, the former military people kind of looked up to him, you know, and  
22      listened to what he would talk about.

23          I think he used to do some kind of training calls, but I don't remember being a part  
24      of any of them, because, you know, a lot of this stuff I already knew from my law  
25      enforcement days, so --

1           Q    What would be, I guess, discussed during these training calls, for example?

2           A    I don't remember. Just maybe gear set-ups or something like that. I kind  
3       of vaguely remember something about how to set up a gear belt or something like that.

4           Q    Got it.

5       "GatorBoy GatorBoy," which is on page 6 --

6           A    I don't know who that is.

7           Q    Okay.

8       And also on page 6, "Gator 6," do you know who that is?

9           A    I think that might have been Jeremy.

10          Q    Jeremy? Okay. Yeah, this is the picture I was kind of trying to  
11       understand. So there's "Gator 6," "Gator 1," "Ap242" -- was that Caleb Berry?

12          A    I don't know.

13          Q    All right. You're clear, that's you for "Whipit," right?

14          A    Yeah. I did not ask to be included in that picture. I didn't know they were  
15       making it. So, yeah, whoever made that, I can't remember anymore, yeah, that -- that  
16       actually made me mad, to see that.

17          Q    Why did it make you mad?

18          A    Because I didn't -- you know, I'm not -- again, as I've said a few times during  
19       this deposition, I wasn't in it for political reasons. I mean, I certainly, no matter what  
20       happened, had no plans of being involved in any kind of insurrection or anything like that.

21          Q    Gotcha. Were you mad in, like, the beginning of January when this picture  
22       was put in, or were you mad after January 6th when --

23          A    When I saw that picture. I don't remember when that was posted, but,  
24       yeah. And I should have actually replied, but I just didn't.

25          Q    Got it.

1           What about "Cobra Shelby" on page 11?

2       A    I remember that call sign or handle, but I don't remember who it was.

3       Q    Was "Strake G." Tom Burgess?

4       A    I don't know.

5       Q    That was on page 14. Do you know Tom Burgess?

6       A    Not by name.

7       Q    What do you mean by "not by name"?

8       A    Well, I mean, you know, some of these people, if you showed me pictures of  
9       it, you know, I might recognize them. But, no, I don't know who Tom -- now, there was  
10      a "Tampa Tom." I don't know if that's the same.

11      Q    Okay. How do you know Tampa Tom?

12      A    Because Tampa Tom was -- it was myself and Tampa Tom. We -- they  
13      asked on the way up there at one of the gas stations -- Kelly got the group of people that  
14      were -- and we're going to go into January 6th again -- but the group of people that were  
15      heading up there, he asked for two volunteers to split from the regular group of Oath  
16      Keepers just to help Ali Alexander's security people. So that's how I ended up with him.

17           But the person -- the other person that volunteered -- I volunteered first, and then  
18      the other guy, his name is -- or I know him as "Tampa Tom," but I don't know his last  
19      name.

20      Q    Okay. Thank you.

21           What about "padimasterdiver" on page 19? Looks like she's the leader of the  
22      South Carolina chapter.

23      A    I don't know who that is.

24      Q    Okay.

25           If we go on to page 23, "Isaacs William" or William Isaacs?

1           A    I don't know who that is.

2           Q    Okay.

3           What about "John - Flagler" on page 28?

4           A    I don't know who that is.

5           Q    And you've already said you know Ms. Kellye SoRelle.

6           A    Correct.

7           Q    Overall, what would be Ms. Kellye SoRelle's role with the Oath Keepers?

8           A    I don't know if she had a role with the Oath Keepers. You know, I just -- at  
9         first, I just knew that we were supposed to protect her.

10          Q    Okay. But you were just protecting her as a celebrity or as, like, another  
11         Oath Keeper, I guess is what I'm trying to understand.

12          A    They asked for volunteers to go protect her, and, you know, I didn't really  
13         ask why or anything like that.

14          Q    I guess I just -- that's something I'm trying to understand. Just help me  
15         understand your mindset. Why wouldn't you ask why about who you're providing --

16          A    Well, I mean, I'm sorry. Let me correct myself. I mean, it was, they said,  
17         we need -- and I think it was Stewart Rhodes in one of the chats -- we need  
18         volunteers -- you know, I don't remember if he specified bodyguard experience or  
19         not -- to go to Detroit to protect her because she's being harassed by different groups.

20          Q    So, if it came down from Mr. Rhodes or from Kelly Meggs, for example, you  
21         didn't really question who you were going to protect or provide services for?

22          A    No. Most of these people, I hadn't -- I hadn't heard of any of them, so, you  
23         know, I would have to google them to see who they were.

24          Q    Okay.

25          ██████████ Does anyone have any followup questions after that, before we

1 get into, you know, January 5th and 6th specifically?

2 All right. Well, it's -- I have it as 2:26 p.m. eastern time. I know it's 1:26 your  
3 time. Let's come back at --

4 Mr. Morelock. Can we just keep going? I'd like to finish this up.

5 [REDACTED] We need to take a quick break, and then we'll come back on the  
6 record at 2:35. Thank you.

7 [Recess.]

8 [REDACTED]. We'll go back on the record at 2:36 p.m. eastern time.

9 BY [REDACTED]:

10 Q Mr. Morelock, I have a few followups from earlier.

11 I guess, walk us through your process of how you would prepare to provide  
12 personal security for folks. So what process did you go through, if any at all?

13 A When I had my business or when I was with the Oath Keepers?

14 Q Let's do both, and compare for us so we can understand.

15 A When I had my business, you know, I would ask, you know, whoever called,  
16 potential clients, why do you need protection? Usually it's just because they were  
17 celebrities.

18 And then, you know, if there was going to be some kind of speaking engagement,  
19 you know, I would go look at the venue, figure out where the exits were, figure out where  
20 the hospitals are, routes to and from hotels, just things like that.

21 Q But for the Oath Keepers, you didn't do the same type of process?

22 A Not as detailed. I tried to be professional, but not as detailed.

23 Q But I'm not even talking about, like, super-detailed. Did you not even, like,  
24 google? I mean, like, you said you didn't know who these individuals were. Did you  
25 google them at some point before you would go provide protection for them?

1           A    Yes. Yes.

2           Q    Okay. And then, I guess, did you notice the nature of these folks were  
3 mostly political? Because I've heard you say you didn't want to do anything political.  
4 But did you notice these were mostly political figures?

5           A    Yes, I did, when I -- like, when I googled Roger Stone and, you know -- but  
6 you try to separate -- just because somebody believes something, one way or the other,  
7 doesn't necessarily mean they don't deserve to be protected from physical harm.

8           Q    Okay.

9           Mr. Rabby. I believe, was your role different? I mean, as a private person  
10 owning and operating a business, that's one thing. But were you in charge of all this  
11 protection with the Oath Keepers, or are you just filling a role they asked you to fill?

12          Mr. Morelock. No, I wasn't in charge. They would -- they knew I had that as a  
13 background, so sometimes they would ask, you know, what do you think we should do?  
14 And, you know, I would offer input that way, but just as far as, I guess, techniques, you  
15 might say, and route planning, that sort of thing.

16          And they didn't listen to me a lot. Like, you know, there was somebody in upper  
17 management who wanted us in helmets and vests, and I'm like, that's not how you work a  
18 personal security detail. Yeah, if you're in Iraq or Afghanistan, yeah, you're going to be  
19 dressed like that, but if you're in Washington, D.C., or, you know, Clearwater, Florida, you  
20 don't need all that stuff.

21           BY [REDACTED]:

22          Q    Okay. And help us, I guess -- I guess, was part of googling these individuals  
23 trying to understand maybe the nature of the threats that could be present while you  
24 were performing security for them?

25          A    Yes.

1           Q     And what was your understanding of what the threats would be, for  
2 example, for folks like Mr. Roger Stone or even looking forward to Mr. Ali Alexander in  
3 January? What were the threats that you were --

4           A     I was more -- you know, from what I understood, antifa were going to target  
5 people like that. So, you know, I was looking for any kind of, you know, I don't know,  
6 posts or anything like that.

7           Q     Okay.

8           And then, when you get on the ground -- let's say, let's take the November D.C.  
9 approach, this possible antifa threat. What did you do, I guess, to prepare yourself to  
10 provide protection in those situations?

11          A     I would, you know, tell the people I'm working with, we need to have a  
12 plan -- and this goes back to training. You know, let's call it "Secret Service Technique  
13 101." If there's a threat, your job is to grab the person you're protecting and get him or  
14 her out of there, away from danger. It's not to stay there and engage the threat or try  
15 to neutralize the threat. It's basically, let's get this person to a safe location and call the  
16 police.

17          Q     And let's take D.C., for example, where there's no, for example, firearms  
18 allowed. How would you be able to provide protection for individuals in that situation?

19          A     A lot of, if you want to call it, executive protection or bodyguard work is  
20 unarmed anyway. And it's something that I would bring up, you know, to some of the  
21 Oath Keepers, who usually didn't agree, but it's mostly unarmed. You're not going to  
22 get in a gunfight with an attacker. You're going to grab the person, cover him or her up,  
23 and either get him in a car and get him out of there or into a building or a room away  
24 from the threat.

25          Q     So help me, then -- and this is jumping a little bit ahead to bigger question.

1 There's a lot of talk of, like, ammunition and gear and stuff like that in this Florida Oath  
2 Keepers chat. How come you didn't speak up at all in that chat to say what you're  
3 saying here?

4 A I remember talking -- I think it was -- in maybe just a personal chat with Kelly  
5 Meggs, saying, we don't need all that stuff, you know. And even in D.C., you know, if  
6 you go through the records, I don't remember on January 5th or 6th, but I told several  
7 people that we do not need to dress up like we're in the military.

8 Q And what was Mr. Meggs's response to those -- to your conversation?

9 A I believe he said something along the fact -- the lines of: National wanted  
10 it. National leadership wanted us to be recognizable.

11 Q And so I'm probably going to keep coming back to this question throughout.  
12 Why did you continue to work this if you disagreed with what they were saying and their  
13 methods?

14 A Because I knew what I'm capable of. I had my plan. You know, if  
15 something happened, I was gonna grab the person and say, look, this is what we need to  
16 do to get you out of here. If they wanted to stay in the crowd or whatever, I would've  
17 just left them. You know, I wasn't going to put myself in any undue danger, you know,  
18 over making the Oath Keepers mad at me.

19 I knew what had to be done, based on the training I had. One of the training  
20 classes I went to was taught by a former Secret Service agent, and that person said:  
21 Forget about all the guns and the bulletproof vests and the karate and all that stuff. Get  
22 your person out of there. Keep a low profile. Be professional. And that's how I try to  
23 conduct myself.

24 [REDACTED] Does any of the staff have any followup from that line of  
25 questioning?

1 BY [REDACTED]:

2 Q Just to confirm, that Secret Service training, was that something you took on  
3 your own, or was that through the Oath Keepers?

4 A That's something I took on my own, way before the Oath Keepers.

5 Q Before? Okay.

6 [REDACTED]. So can we pull up exhibit 17, [REDACTED]?

7 BY [REDACTED]:

8 Q And while he's pulling it up, on December 14th, 2020, Mr. Stewart Rhodes  
9 published a letter on the Oath Keepers website advocating for the use of force to stop the  
10 lawful transfer of Presidential power.

11 Do you remember this letter -- and we can scroll through just so we can see. Do  
12 you remember this letter from Mr. Stewart Rhodes?

13 A I started reading it, but I don't even remember reading the whole thing,  
14 because it was quite lengthy and --

15 Q What did you think, from the little bit you did read? And just to give you, it  
16 goes into the Insurrection Act and stuff. So what did you think as you were reading this  
17 letter?

18 A I thought that would never happen, you know, that President Trump  
19 wouldn't do that. So I just kind of dismissed it.

20 Q And, I mean, this letter is talking about, like, overthrowing the government  
21 to a certain extent, right? How did you -- how were you able to dismiss that?

22 A I don't remember what it said. Like I said, I don't think I read the whole  
23 thing.

24 Q Okay.

25 What was the response of Oath Keepers that you may have been in contact with

1 or in discussions with at this time about this letter? Was this something that was felt by  
2 the majority or just Stewart Rhodes only?

3 A I don't remember any discussion about it. I'm not saying it didn't happen,  
4 but I just don't remember it.

5 Q You're former law enforcement. Like, I guess I'm trying to understand how  
6 this type of rhetoric made you feel as someone that I assume still supported law  
7 enforcement leading up to January 6th, right?

8 A Again, I didn't think it would happen. As I said before, some of these guys  
9 would just basically sit around and grumble about stuff. So I kind of just dismissed it as  
10 that.

11 You know, if I would've thought it was serious, I would've probably called the FBI  
12 and then volunteered to be a confidential informant. But I just -- perhaps I should've  
13 paid more attention, based on what happened, but I just dismissed it. I didn't think  
14 anybody would do anything quite as stupid as what happened.

15 Q And not even talking about what happened on January 6th, just really  
16 focusing on this letter, is it fair to say that individuals were making these types of claims  
17 so frequently that it allowed you to kind of, like, dismiss this as just another grumbling  
18 from the group?

19 A Yeah. And it wasn't just Oath Keepers talking about that stuff. I mean,  
20 people on social media and interviews on TV and -- you know, it's just a lot of people  
21 weren't happy. But, you know, again, I didn't think anything would come of that.

22 Q So you were tracking that other groups, other than just the Oath Keepers,  
23 were talking about these possible options?

24 A Just posts on different social media. I mean, it's -- you know, since then,  
25 I've blocked those kind of posts and put, you know, "not interested" or "spam" or

1 whatever because I just don't want anything to do with it.

2 So, again, it wasn't my, you know, intention for joining the Oath Keepers. You  
3 know, my intentions were honorable, I guess. So it just -- it didn't interest me at all. I  
4 thought it was just basically nonsense. So perhaps I should've paid more attention and  
5 quit sooner than I did.

6 Q Where were you seeing these posts? You said "social media." What  
7 social media app were you seeing these posts on?

8 A I don't remember. Probably all of them.

9 Q Okay. So by "all of them," do you mean Facebook?

10 A Facebook, Twitter, Instagram.

11 Q Parler?

12 A I don't remember Parler. I might have been on Parler, but -- maybe I was.  
13 But, yeah, I just -- I mean, you would hear people talking in the grocery store about stuff  
14 like that. You know, it just --

15 Q What about Telegram? Did you see anything on Telegram?

16 A No. I've only recently joined Telegram.

17 Q Okay. And any other social media apps that I didn't mention that you were  
18 seeing this type of rhetoric on?

19 A Possibly. Again, I didn't pay a lot of attention to that kind of stuff.

20 Q Okay. So you said -- just, like, fill it in for me. What social media app did I  
21 not mention that you might've seen this on that you were active on?

22 A I don't know. Twitter, maybe?

23 [REDACTED]. Thank you, [REDACTED]. Can we pull up exhibit 8, please?

24 BY [REDACTED]:

25 Q And I'm pulling this one up just to orient you again. So this December 19th.

1       Did you follow the President on Twitter?

2           A     No.

3           Q     You didn't follow -- okay. Well, he tweeted on January -- or on December  
4     19th, "Big protest in D.C. on January 6th. Be there, will be wild!"

5           So this is the first time the President mentions January 6th. Do you remember  
6     approximately when you were tracking January 6th as an event?

7           A     Yeah, I guess when they asked -- they did their call to action -- when the  
8     Oath Keepers did a call to action.

9           Q     I'm just -- this is -- I'm just curious. Why didn't you follow the President on  
10   Twitter?

11          A     Why didn't I?

12          Q     Uh-huh.

13          A     I had -- I had no reason to.

14          Q     So who were you following on Twitter, then?

15          A     I don't even know if I had an active Twitter back then. You know, I've  
16     recently started following on a couple cryptocurrency people on Twitter. But I just  
17     remember talk about, you know, posts about that kind of stuff. I just -- again, I don't  
18     pay much attention to politics and things like that.

19          Q     Mr. Morelock, you literally just said to me 5 minutes ago that you were  
20     seeing Insurrection Act stuff on social media like Twitter. That's why I'm asking the  
21     question about --

22          A     Yeah, I said "perhaps Twitter." I mean, I just -- you know, that stuff was all  
23     over the place. It was being covered by normal CNN and -- what's the other one -- FOX  
24     and, you know, channels like that. I don't know exactly where I saw this stuff. But, you  
25     know, when I saw it, I didn't pay a whole lot of attention to it.

1 Q Gotcha. Okay.

2 [REDACTED] So can we put up exhibit 18 now, [REDACTED]?

3 BY [REDACTED]:

4 Q So this is on December 23rd. It's another letter from Mr. Rhodes. In this  
5 one, he says, "Tens of thousands" -- this is in quotes. "Tens of thousands of patriotic  
6 Americans, both veterans and non-veterans, will already be in Washington D.C., and  
7 many of us will have our mission-critical gear stowed nearby just outside D.C."

8 Do you recall this letter?

9 A I think -- I think -- is that his second open letter?

10 Q It is.

11 A Yeah. Again, I might've read some of it, but I just didn't pay a lot of  
12 attention to that, because, you know, I -- I didn't agree with it. I didn't think it was going  
13 to happen. I --

14 Q What part of it didn't you agree with?

15 A That the President should invoke, or whatever you call it, the Insurrection  
16 Act.

17 Q So this one, this letter, what stands out to me, right, is that Mr. Rhodes is  
18 talking about, many of us "patriotic Americans, veterans and non-veterans...will have our  
19 mission-critical gear stowed nearby just outside D.C."

20 What does "mission-critical gear" mean?

21 A I don't know for sure, but I'm assuming that would be, like, you know, the  
22 helmets, the vests, and probably weapons too.

23 Q And doesn't that seem to kind of go in line with the Insurrection Act talk?

24 A You could look at it that way. The way I thought the people that were  
25 going to -- you know, part of the discussion I remember was, you know, the people that

1 had the guns and stuff that were waiting in Virginia would be in case, you know, we  
2 needed rescue, you know, if there was some kind of antifa attack or something like that.

3 But, yes, to answer your question, yeah, you could look at it that way.

4 Q I guess, what allowed you to not look at it that way?

5 A Just my, I don't know, intuition that I didn't think the President was going to  
6 call for an insurrection.

7 Q You also mentioned earlier -- I just want to touch on this -- one of the main  
8 threats you mentioned was antifa. What did you take antifa to be? Like, what was  
9 antifa -- or what is antifa?

10 A I -- to this day, I don't know what antifa is. I know it's a group of people  
11 that, you know, go to protests and sometimes hijack, you know, legitimate protests and  
12 turn them into riots, is kind of what I was thinking.

13 Q I guess, how do you defend against a threat you don't really know what it is?

14 A When it attacks you.

15 Q So, if anyone would've have attacked you -- let's say you're providing  
16 personal security protection for folks. If anyone attacked you, would you have just  
17 assumed it was antifa? Is that kind of what was going around? Or --

18 A I would've -- my concern was not, who is this; more, how do I get this person  
19 I'm protecting, you know, out of here and out of harm's way.

20 Q When you're protecting folks, do you look for certain types of, like, personal  
21 identification or clothing or symbols that can maybe alert you to who they are? Is that  
22 something that's normal to do when you're providing protection?

23 A You just mainly watch the crowd, you know, try to watch people's hands.  
24 You know, if you're in a crowd of people and -- you know, what they told us in  
25 training -- and, you know, 100 people are smiling and 1 guy looks mad, watch the guy that

1 looks mad. That kind of thing.

2 Q Okay.

3 Let's pull up exhibit -- actually, never mind.

4 On December 25th -- and this is in your "Oath Keeper Florida Hangout" -- do you  
5 recall a message from Kelly Meggs saying, "We need to make those senators very  
6 uncomfortable with all of us being a few hundred feet away"? Do you recall Mr. Meggs  
7 saying -- or any rhetoric like that about making Senators feel uncomfortable?

8 A Yes, vaguely.

9 Q What did you take these messages to mean?

10 A I don't remember for sure. It's -- I think it was -- I don't know if it was in  
11 that chat or if it was in a personal chat, you know, with Kelly. Again, I'm like, you need  
12 to focus on providing security. You know, other than that, I don't know.

13 Q But if the leader of the Florida chapter is talking about making Senators feel  
14 uncomfortable, doesn't that show you that it's not necessarily about security, and may be  
15 about a political statement of U.S. Senators?

16 A That's -- yeah, that's one way to look at it.

17 Q What's the other way?

18 A I don't know exactly. I mean, what I -- what I meant by saying that is, I can  
19 understand you seeing it that way or understanding it to be that way.

20 Q How would you have -- I guess, take me through what you were thinking at  
21 this time, though, when you heard, "We're going to make Senators uncomfortable."

22 A Again, I vaguely remember talking to Kelly about it. I don't know if it was  
23 over a phone call or a chat or what. But, you know, I reiterated that, you know, we  
24 should be going up there for security.

25 You know, that's when -- you know, when they asked for volunteers to go with Ali

1 Alexander, that's why I volunteered, to kind of separate myself from that group, you  
2 know. Because this guy Kenny was a hothead -- and I told the FBI this. Kenny was a  
3 hothead. I think Jeremy was a hothead, you know. So I wanted to separate myself  
4 from that group.

5 Q That makes complete sense.

6 So help me understand, then, why you wanted to separate yourself. So I just  
7 read to you, "We're going to make the Senators uncomfortable." It seems totally logical  
8 that you would want to separate yourself from that. What did you take it to mean or  
9 what did they tell you it meant, they were going to make Senators feel uncomfortable?  
10 Like, how were they going to accomplish this?

11 A They didn't say. I don't remember them saying that. So I don't know how  
12 they were going to accomplish that.

13 Q Okay.

14 What did you understand January 6th to be? Like, why were you going to D.C.?

15 A I went to D.C. to provide security for Ali Alexander.

16 Q And the main threat you were tracking for Ali Alexander was antifa or other,  
17 kind of, groups that might be adverse to him?

18 A Correct.

19 Q Did he provide you this list? Did anyone provide you this list? Or was it  
20 just kind of, like --

21 A No. It's just something I assumed.

22 Q What was the nature of the message regarding why you were going to  
23 January 6th? Do you know that?

24 A Uh --

25 Q I guess, what was being told to you about why you all were going to D.C. on

1       January 6th?

2           A     To do security.

3           Q     But who called you to -- was it because President Trump had called everyone  
4     to come to D.C. on January 6th, or was it --

5           A     I don't know.

6           Q     I guess, talk me through why you decided to go to D.C. on January 6th. And  
7     I'm just thinking, like, it doesn't seem like you were thinking a lot about the day, so why  
8     make that trip from Tampa Bay area or panhandle area to D.C.? Why would you do  
9     that?

10          A     Because I really didn't have anything going on. You know, I knew my  
11     expenses were gonna be paid. They didn't. I didn't -- after all that happened, I didn't  
12     contact them about getting any reimbursement or anything.

13          I like D.C. I was hoping that, you know, on one of the two days that we were  
14     there that -- you know, I mean, after everything happened at the Capitol, obviously, it all  
15     went to hell, so to speak, but I was planning on maybe going out and taking some pictures  
16     of the monuments and doing some sightseeing and things like that after, you know, doing  
17     the Alexander thing on the 6th. You know, we were going to have that night, then I was  
18     hoping to do some sightseeing too.

19          Q     Okay.

20          Did you understand that January 5th and 6th was going to be, like, a series of  
21     rallies or events?

22          A     Not until I got up there and got that itinerary. Because, again, I didn't know  
23     I was going to be specifically, myself and Tampa Tom, with Ali Alexander, you know, until  
24     halfway to D.C. So, you know, I didn't know we'd be that busy. I thought it was just,  
25     like, a daytime kind of thing.

1           Q     And, I guess, if it's not events or anything, what would you be providing  
2 security for? Just, like, Mr. Alexander going shopping? Like, what were you providing  
3 security for?

4           A     They just wanted a -- from what Kelly Meggs told us, is Ali Alexander and his  
5 security detail wanted a couple extra -- I don't know if his security detail wanted us there,  
6 to tell you the truth. I think maybe they thought we were imposing or stepping on their  
7 toes or something or, you know, maybe making them think that they were less effective  
8 than they were. But, you know, so -- and I told those guys, I'm like, "Just tell us what to  
9 do. We're here to support you." So --

10          Q     So Mr. Alexander's security detail, do you know -- and I understand he had  
11 almost, like, separate folk that he brought in to have his security detail, almost, like,  
12 layers was the way it was described to us.

13          Do you know who these individuals were, other than you and, it looks like, Tampa  
14 Tom?

15          A     There were two -- I don't know what company they worked for, but they said  
16 they worked for, like, a bodyguard company out of D.C.

17          Q     Can you describe these individuals for us?

18          A     Younger guys, in shape, muscular.

19          Q     Were they Black guys? White guys? Hispanic --

20          A     No. White guys, I think. Maybe Hispanic, but --

21          Q     Okay.

22          A     I kinda remember them being a little dark-skinned, but I'm not sure.

23          Q     Got it.

24          So you received this request from, it sounds like, Kelly Meggs regarding Ali  
25 Alexander. He's the one that kind of alerted you to it?

1           A    Yes.

2           Q    Okay. And you thought it was just going to be purely personal security  
3         detail for Mr. Ali Alexander. Is that correct?

4           A    Correct.

5           Q    And did Mr. Meggs assign you or give you this opportunity because you were  
6         expressing some type of, like, skepticism about the Senator talk? Is that what kind of  
7         prompted this?

8           A    No. The way -- we were at maybe a gas station or a truck stop, and he's  
9         like, "I just got a call from," I think he said, "national. They want two Oath Keepers  
10      that'll be with Ali Alexander and his security in a really nice hotel." I said, "I volunteer."

11           So, you know, it was going to be -- because the Oath Keepers, I forgot where they  
12      were going to say, but he said it was a really nice, upscale hotel, so I quickly volunteered.

13           Q    And the hotel he was talking about was the J.W. Marriott Downtown? Is  
14      that the hotel?

15           A    Yes, I believe so.

16           Q    Got it. Okay. And do you recall when you gave your name for this to Kelly  
17      Meggs?

18           A    Again, it was at a rest stop, you know, when we stopped for gas.

19           Q    Would this have been on January 4th? January 5th? January --

20           A    Forth, probably.

21           Q    Okay.

22           A    I think we left on the 4th to drive up there.

23           Q    Got it.

24           And what were you tracking as to what the other Oath Keepers that were on the  
25      trip with you were going to be doing? What did they tell you they were going to be

1 doing?

2 A I don't remember talking to them about it. Again, we'd have to get into  
3 the events of January 5th. We were supposed to have a meeting with Kelly Meggs and  
4 maybe one or two of his group. This was after I already separated and went with  
5 Alexander and his security people. There was supposed to be a meeting on the 5th  
6 at -- I think it was at 11:00 p.m., if I remember correctly, between Kelly and a couple of  
7 the people that were coordinating whatever Kelly was doing, because Alexander -- do you  
8 want me to get into this now?

9 Q Yeah, please.

10 A Okay. So, from what I understood, what we were going to be doing on the  
11 6th was, there was Ali Alexander -- he had five or six staff people, I guess, with him  
12 usually at all times, two security people. But supposedly he was supposed to meet up  
13 with VIPs, is what they were called -- I think he said some were going to be  
14 Congresspeople -- and escort them from after the President talked -- I can't pronounce  
15 that word. It starts with an E.

16 Q The Ellipse?

17 A Yeah. Wherever that stage was, to a stage where Ali Alexander was going  
18 to be talking at the Capitol.

19 But that meeting never happened. Alexander canceled it. So we were pretty  
20 much in the dark on January 6th. And when you want me to get into that, I will.

21 Q Okay. So you learned of the possible congressional Members on, you said,  
22 the night of the 5th?

23 A Correct.

24 [REDACTED] [REDACTED], can we pull up exhibit 5 and go to page 15?

25 BY [REDACTED]:

1           Q     The reason why I'm pulling -- so this is in your "Florida D.C. OP." It looks  
2 like Gray Gator 1, who I'm just going to assume is Kelly Meggs, mentions the possibility of  
3 personal security detail for eight Congressmen on January 3rd.

4           But you didn't know about it until you got to D.C.? Just help -- like, were you not  
5 tracking --

6           A     Maybe. Maybe. That -- now that's kind of refreshing my memory.  
7 Maybe it was for Congress.

8           Q     Okay. So you knew about the possible PSD for Congressmen --  
9                 [REDACTED]. You can zoom out little bit, [REDACTED], so we can see that whole  
10 message.

11          The Witness. Yeah, I can see it now.

12          BY [REDACTED]:

13          Q     Okay. You knew about this before you made the trip up to D.C., correct?

14          A     Yes. Yes.

15          Q     So was your plan, then, to do PSD for Congressmen and Ali Alexander, or  
16 were there going to be separate people doing it for the Congressmen?

17          A     The Ali Alexander part didn't -- actually, I think it was going to be separate.  
18 I think some people were going to be with Ali Alexander, and then Kelly and whoever he  
19 put in charge of, you know, what you're showing me now was separate.

20          Q     Were the people that you considered hotheaded, were they going to be with  
21 the Congressmen? Like, where were they going to be?

22          A     Yeah, I think they were going to be with the Congressmen.

23          Q     Okay.

24          I guess I'm still trying to understand why you thought this was an apolitical or  
25 nonpolitical thing if you know that you're doing this for Congressmen at a Presidential

1       rally.

2           A     Again, it's just protecting people. You know, it's -- you know, some people  
3     go to concerts. I had an NFL player that liked to go to strip clubs. And, you know,  
4     it's -- you don't really question who you're protecting or, you know, what they want to do  
5     or where they're gonna be or what they're gonna talk about. Your job is to protect  
6     them.

7           Q     And you weren't tracking any possible, like, I don't want to say, like, violence,  
8     but, like, chaos in your chat?

9           And the reason -- I want to -- and I'm going to point you to a specific part of this  
10   chat.

11          [REDACTED]. Could we go to page 21, [REDACTED]?

12          On page 21 -- and believe me -- actually, I don't want to put any words in your  
13   mouth. The first -- it looks like on January 3rd, they send out -- Hatsy sends out an  
14   itinerary of what January 5th and 6th are going to be like. He says, "Just got this" -- I'll  
15   wait for you to scroll down, [REDACTED].

16          Perfect. Can you zoom out little bit?

17          Thank you.

18          So, if you scroll down, Hatsy sends an itinerary on January 3rd. He says, "Just got  
19   this from 'stop the steal' people."

20          And then keep scrolling down, [REDACTED], the next page.

21          And then someone says back, "8x flex cuffs."

22           BY [REDACTED]:

23           Q     That doesn't seem like just a standard personal security detail, does it? Or  
24   you correct me if I'm wrong.

25           A     No, I wouldn't bring flex cuffs on any detail.

1 Q So I guess I'm trying to understand what your mentality was about what you  
2 think January 6th was going to be when you're seeing rhetoric like this in the Signal chat?

3 A I just thought it was people running their mouths.

4 Q Okay.

5 Do you recall, did Kelly Meggs ever tell you which congressional Members you all  
6 were supposed to be escorting from the Ellipse to the Capitol?

7 A I don't recall.

8 Q Was a march, I guess, per se, from the Ellipse to the Capitol always part of  
9 the plans for the security you were going to be providing?

10 A Yes. As far as I knew, it was.

11 Q Okay.

12 [REDACTED]. Can you take that down, [REDACTED]? We're good. Thank you.

13 BY [REDACTED]:

14 Q And were there specific parts of the day for January 6th, whether it be at the  
15 Ellipse, at the Capitol, or the march, that you all considered more high-risk?

16 A No --

17 Q Okay.

18 A -- not that I remember.

19 Q How many people overall were needed for the security on January 5th and  
20 6th that you recall?

21 A For just that -- well, there was myself and Tampa Tom for Alexander  
22 personally. And then, you know, I think there was, like, 20 or 30 other ones that were  
23 responsible for the -- I guess the Congressmen or the VIP or whatever you want to call it.

24 Q Do you remember which VIPs that those other folks provided protection for?

25 A No. I know a group of Oath Keepers did have Roger Stone. And I think

1 the guy Josh from Alabama was in charge of that. I'm not sure.

2 Q Got it.

3 Were you coordinating with Oath Keepers from other States on the security for  
4 January 6th?

5 A No, not that I remember.

6 Q Just that Josh guy from Alabama? He's the only one?

7 A I didn't coordinate it with him. I just remember somewhere him and his  
8 group or whatever getting assigned to Roger Stone.

9 Q And I think you might've mentioned this earlier. Were you paid for this job,  
10 for coming to D.C. on this?

11 A No.

12 Q Was that part of a deal for you all agreeing to come, was that you'd be  
13 reimbursed or paid?

14 A Usually, on any Oath Keeper call to action, you would get reimbursed hotel,  
15 food, gas, rental car if you needed it.

16 Q And would it be reimbursed by the individual you're providing security for or  
17 by the organization?

18 A No. Usually it was Oath Keepers.

19 Q Other than, like, Ali's, it sounds like, separate security, was it only, kind of,  
20 the Oath Keepers that were providing the security where you were involved or where  
21 others were involved? Or was it, like, a combination of you all and other organizations?

22 A What are you -- I'm sorry, I don't follow you.

23 Q Was it a combination of Oath Keepers and Proud Boys, for example,  
24 providing security, or was it just Oath Keepers?

25 A The only time there was another group was -- remember I said the first

1      Million MAGA March? There was Proud Boys also around Alex Jones.

2            Q     I guess I'm -- for January 5th and 6th, though, was it the same? Were there  
3      Proud Boys helping with security at all?

4            A     Not that I saw or were aware of.

5            Q     So, of what you saw and what you were aware of, it was just Oath Keepers  
6      and then those two guys that Ali had on the side as well?

7            A     Correct.

8            [REDACTED]    Can we pull up exhibit 9, [REDACTED]?

9            BY [REDACTED]:

10          Q     These are going to be text messages between you and Ali Alexander. And  
11      this is just to get you in the mind of the dates on here.

12          Okay. So I believe, just to confirm, your number is the [REDACTED] number?

13          A     Yes.

14          Q     So it looks like you text Mr. Ali Alexander on January 5th at 11:00 a.m.  
15      Just walk us through your travel of how you got to D.C. from the panhandle.

16          A     I met up with Kelly Meggs at the car dealership he worked at in Lake City,  
17      Florida. I left my car there and rode with him in his truck.

18          We met up with two or three other vehicles around Jacksonville, drove up to an  
19      Oath Keepers' house in -- or property, I should say, in North Carolina. I know him as  
20      "Ranger Doug." I think it might be Doug Smith.

21          We just stayed there for 4 or 5 hours, kind of slept in, I don't know, basically a  
22      shed on cots, and then drove to D.C. on the 5th.

23          Q     So what day did you leave? January 4th, you said?

24          A     Yes.

1 [3:10 p.m.]

2 BY [REDACTED]:

3 Q Okay. Who -- and you met up with Kelly Meggs. Who all -- who else rode  
4 with you all?

5 A In Kelly's truck, there was his wife, a young 20-year-old Oath Keeper named  
6 Caleb. I don't know his last name.

7 Q Caleb Berry that I mentioned earlier?

8 A I don't know his last name. I just know him as Caleb. And then the guy  
9 Joe.

10 Q Gotcha. Okay. And who else was with you, if anyone at all, when you all  
11 stayed in North Carolina?

12 A Pretty much the whole carpool from Florida. There was three or four other  
13 vehicles. I know the Jeremy guy was driving an RV. I think he stayed on the property,  
14 I'm not sure, but there was probably 10 people -- 10, 12 people that slept in  
15 North Carolina at Ranger Doug's property.

16 Q Can you name, to the best of your recollection, as many of those 10 or 12  
17 people, even if it's just first name, that rode with you all in the caravan?

18 A I remember Jeremy. I think Kenny was in the caravan, but I don't know for  
19 sure. And then as I said, Kelly, Kelly's wife, Joe, and Caleb and myself in Kelly's truck, but  
20 I don't remember the other people off the top of my head.

21 Q What were you all discussing as you were making this trip from Florida up to  
22 D.C.?

23 A It was a long trip. We just talked about a lot of stuff. Listened to music a  
24 lot. I don't recall anything -- I mean, we were probably talking a little bit, you know, as  
25 far as tactics and, you know, routes and things like that, but nothing that I can remember

1 stands out.

2 Q Tactics and routes for what?

3 A Getting people to and from their hotel. You know, I probably,  
4 again -- maybe this is when I talked to -- you know, I said it's important if there's a threat  
5 to get the person out instead of staying and trying to fight the threat or whatever, maybe  
6 things like that, but I don't remember for sure.

7 Q I guess -- this is taking like a few steps back. What were you all expecting  
8 would happen in D.C. on January 5th or 6th?

9 A I don't know what anyone else was expecting. I can't speak for them.  
10 Myself, I was expecting to go up there, provide security, what I thought would mainly be  
11 during the day, maybe a little bit into the evening, and then, you know, go off by myself  
12 and take some photographs of the monuments.

13 Q You're talking about tactics and routes, though. What were you expecting  
14 not just like -- were you expecting there to be violence or any type of situations that  
15 would cause for that?

16 A Yeah. When you do that kind of stuff, you always plan for something, I  
17 mean, or, you know, expect it, try to have a response to it. But, you know, again, there  
18 was the Antifa threat, you know, so I thought.

19 Q So you mentioned the Antifa threat. And you had done rallies in  
20 November, you had done rallies in Florida. Did you ever have any actual situations  
21 occur during these events before?

22 A I didn't do any rallies in Florida.

23 Q Other than Mr. Stone speaking --

24 A Yeah, his speeches. Yeah, we didn't have any problems.

25 Q Did you have any problems at the -- you said there was no problems at the

1        Million MAGA March November as well, right?

2            A     No, no problems.

3            Q     I guess, if there had been no problems previously, why were you expecting  
4     there to possibly be a problem this time with Antifa?

5            A     It's just always a possibility.

6            Q     Okay. So how long did you all stay in North Carolina?

7            A     Maybe 4 or 5 hours.

8            Q     Overnight?

9            A     We got in there at probably like -- I don't know, I don't know the time for  
10    sure -- 9, 10, 11 o'clock, and we left by 4 or 5 in the morning.

11          Q     And you were with these individuals the whole time until you got to D.C.?

12          A     Correct.

13          Q     Did they stay in D.C. as well?

14          A     Yeah. The majority, Kelly and his, you know, what turned into his group,  
15    yeah, they stayed at -- I don't remember where they stayed, but they stayed in D.C.

16          Q     While you all were traveling up, did you talk at all about, you know,  
17    President Trump's tweets or election being stolen or Insurrection Act? Did that come up  
18    during conversation?

19          A     Not that I remember.

20          Q     [REDACTED], can we pull up exhibit 5, again, and let's see -- let's go to -- let me  
21    check the site real quick.

22          Let's go to page 2, and scroll down to the bottom of it. So at the bottom of this,  
23    Gray Gator 1, who I think -- you can't confirm, though -- is Kelly Meggs, says,  
24    "Wednesday," as in the 6th, is "full on battle rattle."

25          What does that mean?

1           A     The battle rattle is what they refer to as their helmets and their bulletproof  
2     vests.

3           Q     And this is the part you disagreed with that you were saying?

4           A     Yes. Yes.

5           Q     Okay. Thank you, █████. You can take it down.

6           And so you arrived on January 5th, correct?

7           A     Yes.

8           Q     And you -- then you were dropped off, I'm assuming, at the JW Marriott?

9           A     Yes. First, we dropped off, you know, everybody that had weapons,  
10     dropped them off in Virginia at the Comfort Inn, as I told the FBI. And then another  
11     Oath Keeper, I don't remember what his name was, took myself and Tampa Tom to  
12     the -- we couldn't pull up to the JW Marriott because D.C. Police had that area kind of  
13     blocked off for vehicle traffic, so we had to walk like four block -- four or five blocks in  
14     that perimeter to JW Marriott.

15           Q     So let's backtrack. You said you dropped off folks with weapons at the  
16     Comfort Inn in Virginia. Who got dropped off at the Comfort Inn in Virginia?

17           A     Everybody else stayed there, you know, and I left separately, myself, Tampa  
18     Tom, and this guy that was driving a van, left that whole group.

19           Q     So did Kelly Meggs and Ms. Connie Meggs stay in D.C. or at the Comfort Inn  
20     in Virginia?

21           A     I believe they stayed in D.C.

22           Q     Okay. And what type of weapons did people bring if they're being dropped  
23     off at the Comfort Inn?

24           A     Rifles and pistols.

25           Q     Why were you all bringing rifles and pistols?

1           A    I don't know. I mean, I had two pistols.

2           Q    Why did you bring two pistols?

3           A    It's just personal choice. I mean, I brought -- I brought my weapons. I  
4 have a concealed weapons permit. It was good in all the States except for Washington,  
5 D.C., so, you know, I made sure I was legal the whole way up there and back, but I did  
6 leave them in at the Comfort Inn in Virginia. But, you know, sometimes I carry a gun  
7 because it's my right and I'm a former police officer. If I see something happening on  
8 the side of the road, you know, an officer getting attacked or, you know, a robbery or  
9 something, you know, I may or may not get involved.

10          Q    So you all were tracking D.C.'s gun laws then previous before January 6th?

11          A    Yes. Yes.

12          Q    Okay. And -- and I guess the rifle -- look, I get it with the pistol stuff.  
13 Why -- why -- what was the thought in bringing rifles from Florida to Virginia for personal  
14 security details on January 5th and 6th?

15          A    I can't speak for the people that brought them.

16          Q    I'm not asking you to speak for them; I'm asking what you might've heard on  
17 the ride up.

18          A    I don't remember any conversation about that.

19          Q    Okay.

20          A    You know, I think at one point I told Kelly or something that, you know, we  
21 didn't need to bring a lot of weapons. I just -- again, I don't remember specifics of that  
22 conversation but, you know, I did make my point known that I didn't think we needed to  
23 bring rifles. So -- you know.

24          Q    Right.

25          A    They're grown men. They have their permits. I can't tell them what to

1 do. I wasn't a leader. I wasn't in charge.

2 Q So on your ride up, you heard nothing of a QRF, or quick reaction force, for  
3 the hotels in Virginia like the Comfort Inn?

4 A I don't know if we discussed that on the way up. There was some  
5 discussion about it in one of the planning chats or something that there would be a QRF,  
6 but, again, they tended to assign military or ex-military guys to those groups, you know,  
7 instead of, you know, police or former cops or, you know, people with no military  
8 experience. So --

9 Q I guess I'm trying to understand, though, what you thought this was going to  
10 be -- like a QRF, does that seem synonymous with personal security detail, by the way?

11 A It's overkill.

12 Q So why did you -- what was your understanding on why folks in your group  
13 were planning for a QRF?

14 A I don't -- a lot of these people I just dismissed as people that are sitting on  
15 the couch, they like to dress up in what we call the cool guy stuff, you know, the helmets  
16 and the things -- I don't agree with it. That's not my lifestyle, but it wasn't my place to  
17 say anything to the contrary to the people. So I just kept my mouth shut.

18 Q That I understand. I definitely do. Do you -- do you know if there was  
19 anyone in charge of or kind of coordinating the QRF?

20 A Probably, but I don't remember who -- who it was.

21 Q Was it Mr. Ed Vallejo? Does that ring a bell?

22 A I do not remember.

23 Q What about Mr. Caldwell, Thomas Caldwell?

24 A I don't remember.

25 Q Do you know where the QRF was? Was it in the Comfort Inn in Ballston,

1           Virginia?

2           A     They were staged somewhere in Virginia, but I don't know where they were  
3        staged. I think they might have had their own chat group. I don't remember.

4           Q     Do you recall dropping off anybody in the Hilton Garden Inn in Vienna?

5           A     No, I don't think so.

6           Q     Can you pull back up exhibit 5 and go to pages 9 and 10, [REDACTED]?

7           So in this chat that we're going to go down to on page 9 and 10, Gray Gator  
8        updates you all on the ammo situation if SHTF, which I'm assuming means shit hits the  
9        fan. What could possibly hit the fan that you all were preparing for that you would have  
10      to be updated on the ammo situation?

11          A     I don't remember for sure. That might have been like an armed Antifa  
12        attack or something like that. Again, I just -- that kind of stuff I just dismissed. I knew  
13        the shit was not going to hit the fan. I guess I was wrong because the Capitol got  
14        attacked, but, you know, I didn't expect problems.

15          Q     But you took this all to mean to counter the threat to Antifa. That's what  
16        all this talking was about?

17          A     That's how I understood it.

18          Q     Thank you, [REDACTED].

19          So, again -- you stayed at JW Marriott. You might have said this, but who  
20        stayed -- was any other Oath Keeper stay with you in the JW Marriott?

21          A     Tampa Tom.

22          Q     Tampa Tom. Did you all stay in the same room or different rooms?

23          A     Same room.

24          Q     Was your room paid for when you got there or did you guys pay for it?

25          A     The room was paid for. I had to give them my credit card for incidentals,

1 but we didn't do anything from the mini bar or anything like that.

2 Q Who paid for the room?

3 A I don't know. I'm assuming it was Ali Alexander.

4 Q What gear -- I know you didn't bring any guns; you've already mentioned  
5 that. But what gear or equipment did you bring with you to Washington, D.C.?

6 A I think I might've brought my vest, my bulletproof vest, but, you know, I  
7 didn't wear it, but I think I brought it. I'm not sure.

8 Q Okay. So did you bring any helmets or anything?

9 A No, I don't think I had a helmet.

10 Q What about plates or plate carriers?

11 A That would be included in the vest.

12 Q Okay. So there were plates in the vest?

13 A Yes.

14 Q And why did you feel it necessary -- was this something normal to wear, like  
15 a vest, when you were doing PSD for folks?

16 A I knew I wasn't going to wear it, but I just brought it.

17 Q I guess, why would you bring it if you didn't think you were going to wear it?  
18 And just help me understand it, that's all.

19 A I really don't know. I don't have an answer for you.

20 Q What about radios? Did you have radios with you?

21 A No.

22 Q Can we go to exhibit 5 at 23, Jacob? And by 23, I meant page 23. Sorry.  
23 I'm talking like we're in court or something.

24 Q Okay. So it looks like Gray Gator says -- and this might be at the bottom of the  
25 page. First of all, there's mention of a QRF right there. Then it looks like radio

1 programming will also be on Tuesday night, which appears to be January 5th.

2 Did you take part in a radio programming on Tuesday night?

3 A I don't know what that's about. I didn't have radios. I don't know if any  
4 of the other people did or not.

5 Q Was it normal for you all, from people from your group, to use radios at  
6 events that you were with them at?

7 A I -- I can't remember. I think in Louisville they had radios is one time I  
8 remember. I didn't have one, but I think I remember they had them in Louisville.

9 Q What was the purpose of having the radios in Louisville?

10 A I guess so they could talk to each other, because there was -- you know, I  
11 think I told you there was two different locations, a Shell station and then there was  
12 a -- the pawn shop, and then they had a couple car loads of people just kind of cruising  
13 around spotting things.

14 Q Okay. So you weren't aware of the type of radios or what channel the  
15 radios were synched to --

16 A No.

17 Q Do you know who would know that?

18 A No. I'm not a radio guy either. I don't know anything about those.

19 Q Okay. Can we go to page 27, [REDACTED]? Thanks.

20 So there's a mention to burner phones on this page. Are you aware of any -- by  
21 Deplorable 1. Yeah, right here. "Won't have time to try to do much about it, so I'll try  
22 to pick up a burner phone before I start north."

23 Are you aware of anybody using burner phones on January 5th and 6th?

24 A Not that I know of. I know that on, you know, like for some of the call to  
25 actions, you know, I told you you call a number off the website, I think maybe that could

1 have been a burner phone.

2 Q Okay.

3 A A temporary phone. But I don't remember specifically about January 5th or  
4 6th.

5 Q I guess, overall, why would burner phones be used if you're just providing  
6 personal security details?

7 A I wasn't in charge of that. I don't know why they were talking about it. So  
8 I don't see any reason for it.

9 Q We can take that down, Jacob. Thank you. Can we pull up exhibit 11?

10 It looks like on January 4th, an individual -- I asked you earlier about Stephen  
11 Brown. You said you didn't know him. But it looks like a list is sent from Stephen  
12 Brown to Ali Alexander, and this is an email. I'll let you get acquainted with it.

13 This is the list of the PSD we have working with us --

14 A I'm sorry. Can we take a break? This is running longer than I thought, and  
15 I need to text a potential client. I was supposed to be somewhere at 3 our time, so I  
16 might need to text them and --

17 Q Please. Does 10 minutes work for you to square that away?

18 A Yes, sir. Thank you.

19 Q Okay. We'll come back in 10 minutes.

20 Mr. Rabby. Thank you.

21 [Recess.]

22 █ All right. It is 3:35 p.m. Eastern time, and we're going back on  
23 the record now.

24 BY █ :

25 Q Just going back, Mr. Morelock, you described a lot of ways how the rhetoric

1 and the chat and some of the actions you might have witnessed other folks taking was  
2 not normal of a regular personal security detail, right? You've said like the helmets, for  
3 example, the gear. That's not what you do in a personal security detail.

4 So why did you continue acting like it was just a normal security detail as you were  
5 on your way up on January 5th and 6th?

6 A Because that's how I was going to treat it. That's how, you know, I was  
7 going to conduct myself, you know, like I always had in the past.

8 Q But if the people around you weren't conducting themselves that way, did  
9 you think that might bleed over into your conduct or your actions?

10 A I -- I had made up my mind, if something crazy happened, you know, if they  
11 overreacted to a threat or anything like that, that I was just going to separate myself from  
12 them. So I just, you know, was under the impression that maybe nothing would happen.  
13 We would do the details. If something crazy happened, I was just going to walk away  
14 from the whole thing and, you know, gone sightseeing.

15 Q Got it. Okay.

16 [REDACTED]. [REDACTED]?

17 [REDACTED] Yes. Thank you.

18 BY [REDACTED]:

19 Q So, Mr. Morelock, I was hoping to zoom back a little bit and go away from  
20 the events of January 5th, January 6th, at least for just a couple of questions, talk about  
21 more your relationship with Oath Keepers, what motivated you to join.

22 And I guess my first question on that front is: We talked a lot about the fact that  
23 you wanted to join to protect folks against threats, and the threat you identified was  
24 Antifa. Is that right?

25 A Not just Antifa. It's just, you know, the business owners that were having

1       their businesses burn during some of the protests that escalated into riots. There  
2       wasn't enough police officers, obviously, to protect these businesses or they wouldn't  
3       have been on fire or looted. So I was just -- as an ex-police officer, it was tough to watch  
4       that happen, knowing that, you know, the Oath Keepers would give me a chance to do  
5       something to help instead of just sitting on the couch like a lot of people.

6           Q     Got it. So did you conceptualize the Oath Keepers as a vehicle for former  
7       law enforcement to help protect individuals who were at threat?

8           A     That's a very good way of saying it, yes.

9           Q     Could you expand on that at all?

10          A     I don't know how. That's what it was.

11          Q     Okay. Got it. So on that note, you've mentioned there were other  
12       threats in addition to Antifa. Specifically, did you view the Black Lives Matter movement  
13       as a threat when you were thinking about joining?

14          A     No, not necessarily. You know, I can understand that movement, you  
15       know. I don't know -- their base or, you know, their grassroots, I understand it. You  
16       know, there's been bad police shootings in the past. So, you know, I understand where  
17       they were coming from. It seemed to me like maybe some of their protests got hijacked  
18       by, you know, people with ulterior motives, other than --

19          Q     Would those folks be Antifa who were hijacking the rallies?

20          A     Possibly, yes. I understood that was a possibility.

21          Q     That's good to know. So you first became motivated to join the Oath  
22       Keepers, you said, following the murder of George Floyd and some of the protests that  
23       happened in the months afterward.

24          A     Sure.

25          Q     Great. So I guess my question would be: How did you view the

1 relationship between those protests and some of the threats you were identify, Antifa or  
2 otherwise?

3 A I don't understand your question.

4 Q Did you see those protests as being manipulated by people with ulterior  
5 motives? Did you see people coming into interrupt those protests?

6 A Yeah.

7 Q Why did you see -- go ahead.

8 A Yeah. I think that was a possibility. Again, I remember even on some  
9 mainstream, you know, FOX, CNN, whatever, they were -- somebody was talking about it.

10 Q And once you got more involved in the Oath Keepers, did you hear other  
11 people talk about the Black Lives Matter movement and Antifa in similar terms?

12 A I remember Antifa being discussed a lot more than BLM.

13 Q But when you did hear them being discussed, how were they being  
14 compared or being analyzed?

15 A I don't remember any comparisons or analysis. I just remember them  
16 being identified as a possible threat and, you know, people that are out, you know, trying  
17 to turn, you know, our regular protest into a riot.

18 Q And so people were generally sharing your view that it was possible that  
19 some of these BLM protests may be hijacked by bad actors?

20 A I don't remember any specific discussions, but I would say probably.

21 Q Great. So as the year went on and we moved away from the summer when  
22 a lot of those protests took place, was there continuing conversation about how bad  
23 actors might try to hijack various kinds of protests, whether it was racial justice or related  
24 to the election?

25 A I don't remember any specifics, but I'm certain, sure, it was possible.

1           Q     Great. And I guess before I move on to a different topic, I just wanted to  
2 ask if there's any other time you remember Stewart Rhodes, Kellye SoRelle talking about  
3 how Antifa might be related to Black Lives Matter, might be related to other perceived  
4 threats?

5           A     I don't remember -- I don't remember either of them making those  
6 statements.

7           Q     Great. So moving a little bit. I want to talk about your former history as a  
8 law enforcement officer and how that might have influenced you to join the Oath  
9 Keepers and things in that category.

10          So as a preliminary question, I wanted to ask: Were you attracted to the Oath  
11 Keepers because of your background in law enforcement?

12          A     I was, you know, attracted to them because, at that time, they were trying to  
13 make a difference at these protests and riots. That's what attracted me, if that's what  
14 you're asking.

15          Q     Yes. And did you feel like you were well-suited to join their efforts because  
16 of your background as a law enforcement officer?

17          A     Yes.

18          Q     And would you say it's fair to describe the organization as filled with a lot of  
19 veterans and law enforcement, former law enforcement?

20          A     Yes. Yes.

21          Q     Were you aware of Active Duty law enforcement or military members when  
22 you were --

23          A     Yes, there were a couple. I don't remember who they are, but in Lafayette,  
24 Louisiana, I think there was one or two active police officers. I don't know if any active  
25 officers were working in D.C. or not -- or not working --

1 Q Did you ever -- go ahead.

2 A I don't remember any active officers affiliated with the Oath Keepers being  
3 in D.C. I don't remember.

4 Q At -- in other areas when you were working with them, did you interact with  
5 any Active Duty officers, as far as --

6 A The only ones I remember was in Louisiana.

7 Q Okay. Great. So why do you think that veterans and law enforcement  
8 officers, both active and retired, are drawn to the Oath Keepers?

9 A Because they want to, you know, help out, you know, at the different riots or  
10 protests or whatever.

11 Q Right. And how do you --

12 A It's in your blood.

13 Q Sure. So how do you think that their presence, the presence of veterans  
14 and law enforcement officers, affected the Oath Keepers as an organization -- how you  
15 were organized, how you planned your mission strategies, what missions you chose?  
16 Can you talk me through a little bit about that?

17 A I mean, that's who the Oath Keepers were, former military, law  
18 enforcement, I guess some firefighters, paramedics. You know, again, why those  
19 particular people join, I can't speak for them. I don't quite understand what you're  
20 asking -- or did I answer your question?

21 Q You answered my question, yeah. In terms of some of the internal chats,  
22 preparation for strategy, especially leading up to the operations in Washington, do you  
23 believe that preparation was influenced by the fact that there were a lot of veterans and  
24 law enforcement in the ranks?

25 A Yeah. I mean, that -- yes. Again, I don't quite know where you're going

1 with this. That -- that's what made the Oath Keepers, I don't know, I guess,  
2 effective at, you know, some of these protests, the fact that they were past military, law  
3 enforcement. I'm not quite following you.

4 Q I'm just trying to get a better understanding of how the Oath Keepers saw  
5 themselves as functioning and how they were trying to maximize their effectiveness, as  
6 you say --

7 A I can't -- I can't speak for the rest of them. Up until, you know, all this  
8 happened at the Capitol, you know, I was kind of proud to be out there, you know,  
9 volunteering for free, protecting people's businesses that, you know, I didn't know, you  
10 know, in a different State. You know, I just felt it's something I knew how to do and that  
11 I should do it, you know, as a citizen. So, you know, I can't speak for the other Oath  
12 Keepers, though.

13 Q Got it. And do you think there was an active strategy on the part of Oath  
14 Keepers' leadership to recruit Active Duty law enforcement, military members? Did you  
15 ever hear talk of that strategy?

16 A Yeah. They were always trying to grow their ranks and, you know, they -- I  
17 never went to any of them, but they would hold recruitment events, you know, like at  
18 different, I don't know, events or venues, you know, where they would try to sign people  
19 up. You know, they had their website that, you know, asks people to sign up and that  
20 sort of thing.

21 Q And so at these recruitment events, were they held to explicitly target Active  
22 Duty law enforcement or was this just a general admission?

23 A They were just general -- again, I had never attended one, so, you know, I  
24 don't know. I've just heard that they had done them in the past; you know, that  
25 they -- they didn't specifically target former law enforcement. You know, it was, they

1        wanted ex-military, military, ex-law enforcement, law enforcement, and then firefighters  
2        and EMTs and paramedics. But I don't remember any particular group being targeted  
3        above, you know, another subset, I guess.

4            Q        And you also spoke earlier in the interview about the law enforcement  
5        liaison role. So could you speak a little bit more about how day-to-day Oath Keepers  
6        chapters were expected to interact with local law enforcement counterparts?

7            A        To my knowledge, they weren't day-to-day. It was, you know, specific call  
8        to actions. Like in Lafayette, I was assigned to be the liaison with the Lafayette Police  
9        Department. There was a detective that, you know, I talked to. I introduced myself,  
10      told him, you know, about how many of us there would be, and probably gave him the  
11      vehicles that we would be in, and that sort of thing. But there wasn't a day-to-day  
12      effort. It was, you know, call to action specific.

13           Q        Operation specific. Got it. And to your knowledge, did that kind of  
14      preparation or coordination occur before some of the events in Washington?

15           A        I don't know.

16           Q        I guess if you don't know, then you wouldn't be able to answer any further  
17      questions about it.

18           More generally, how did you hear leaders of the Oath Keepers talking about the  
19      importance of interacting with law enforcement, whether over the summer or as we  
20      draw closer into the fall and the winter?

21           A        It was just a call to action specific thing. There was no prolonged let's get  
22      to know these different people or anything, that I know of anyway.

23           Q        And do you recall any instances in which veterans or former law  
24      enforcement or Active Duty members of either kind of service came to provide firearms  
25      trainings for Oath Keepers?

1 A Not that I know of.

2 Q And were there any other efforts, that you can remember, of Oath Keepers  
3 to establish rapport with sheriff departments outreach that were not operation specific?

4 A Not that I remember.

5 [REDACTED] I think that's pretty much all I've got. I'm not sure if anyone wanted  
6 to follow up.

7 [REDACTED]?

8 BY [REDACTED]:

9 Q Mr. Morelock, sort of along the same lines, was there ever any -- were there  
10 ever any documents that were produced by the government that were transmitted over  
11 Oath Keepers' signal chats or emails that weren't public documents?

12 A Not that I know of.

13 Q Got it. And continuing with what [REDACTED] was asking, given, you know,  
14 the disproportionate representation of veterans and law enforcement in the Oath  
15 Keepers, were you surprised at how the Oath Keepers engaged with law enforcement in  
16 hand-to-hand combat on January 6th?

17 A Yes.

18 Q Why?

19 A Because we always cooperated with law enforcement in the past. I don't  
20 have any specific knowledge of anybody that did engage in hand-to-hand combat, as you  
21 say, with law enforcement. I don't -- maybe I read that somewhere. I'm not saying it  
22 didn't happen, but, yeah, I was surprised that that was alleged.

23 Q Got it.

24 [REDACTED]. [REDACTED]?

25 [REDACTED]. Can you pull up exhibit 11? I'm sorry about that. And we were

1 starting to go through that email before we went on break. And it's the email from  
2 Stephen Brown to Ali Alexander.

3 I just want to go through these individuals to see if you recognize them, similar to  
4 the exercise we went through earlier, but this email appears to be from Kelly Meggs,  
5 originally to Stephen Brown, for Oath Keepers to perform personal security detail on  
6 January 5th and 6th. Kelly Meggs --

7 Mr. Rabby. Can you enlarge it a little bit?

8 The Witness. Yeah, I can't read it.

9 [REDACTED]. And let's scroll down, [REDACTED].

10 BY [REDACTED]:

11 Q All right. So Kelly Meggs. You talk about him. Connie Meggs. That's  
12 Mr. Meggs' girlfriend, correct, or wife?

13 A Wife.

14 Q And this Caleb Berry. Is this -- you mentioned a Caleb, right?

15 A Yeah. I would assume, probably.

16 Q Yep. David Owensby. Do you know that individual?

17 A No.

18 Q What about Richard Dockery?

19 A No.

20 Q Kenneth Harrelson, with a --

21 A I think that's Kenny.

22 Q Okay. You can keep scrolling down, [REDACTED].

23 What about the David Moerschel? You said no earlier?

24 A I don't think so, no, not that I remember.

25 Q Okay. Ken Bittner?

1 A Not that I remember. Unless -- no, that's not Kenny.

2 Q Okay.

3 A No, I don't think I know that Ken.

4 Q What about Robert Lemar?

5 A Doesn't ring a bell.

6 Q Jeremy Brown? Is that the hotheaded Jeremy?

7 A Yes.

8 [REDACTED] Just for the record, Ms. Stephanie Murphy has joined the  
9 deposition.

10 BY [REDACTED]:

11 Q Jeremy Brown is the hotheaded Jeremy that you mentioned?

12 A Correct.

13 Q Okay. Graydon Young?

14 A Doesn't sound familiar.

15 Q Terry Cummings?

16 A You know, actually, the Genx Pat, that might be a guy from the east coast of  
17 Florida. I think he might have been on one of the Roger Stone nights, but I'm not sure.

18 Q Okay. Terry Cummings?

19 A Doesn't ring a bell.

20 Q Jason Dolan?

21 A Again, doesn't ring a bell.

22 Q Can we keep scrolling down, [REDACTED]?

23 Of course, Jeff Morelock, Whipit, that's you.

24 A That's me.

25 Q Joe Hackett?

1           A    I know the one Joe, you know, that rode with us, you know, in Kelly's truck  
2    to D.C.  It might be the same Joe, but I'm not sure.  I don't know what his last name is.

3           Q    Okay.  Aaron Stone.  You mentioned a Cat Daddy earlier.  I asked if it  
4    was Aaron Stone.  This is why I was asking that, because it looks like --

5           A    Yeah.  I don't -- I don't ever remember hearing Cat Daddy's real name.

6           Q    Okay.  Was Cat Daddy in part of that caravan that rode up with you from  
7    Florida to Virginia?

8           A    He might have been, but I'm not 100 percent sure.

9           Q    Scott Thompson, Deep Sea?

10          A    No.

11          Q    Steven Taylor, Dr. S Florida Oath Keeper?

12          A    No.  You know, I remember the Dr. S Florida Oath Keeper.  I've seen that  
13    in the chats before, but who it is, I don't know.

14          Q    Looks like Eduard or what we understand to be Eduard Durfee?

15          A    I don't know that person.

16          Q    Alondra Propes?

17          A    I know who that is.  She was in D.C., but --

18          Q    What was she doing in D.C.?  What was the nature?  How do you know  
19    she was in D.C.?

20          A    Because I remember seeing her on the 6th.  Again, we'd have to get into  
21    that day, what happened.  I know we haven't gotten that far yet.

22          Q    Tell me where you saw her on the 6th.  What she was doing, things of that  
23    nature.

24          A    We -- after the President was done talking and we got separated from Ali  
25    Alexander and five or six of his people and security, myself, Alondra, Caleb, and then one

1       of Ali Alexander's -- I don't know if it was a staff or a speaker or a supporter -- we got  
2       separated from the main Oath Keeper group and, you know, we had to make our way to  
3       the Capitol on our own. But Alondra and Caleb, they weren't wearing, like, helmets or  
4       bulletproof vests either. So --

5           Q     But Ms. Propes went to the Capitol with you -- with you all?

6           A     Yeah. Yeah, she was at the Capitol.

7           Q     Okay. Was she like performing personal security detail like you all were?

8           A     Yeah. She was supposed to be part of the group that was going to escort, I  
9       guess, the -- now we know they were the eight Congress people and then other VIPs. So  
10      she was part of Kelly's group but got -- her and Caleb both got separated from them.

11          Q     And I know this is a little ahead, but just to be clear, you all -- did you all end  
12       up escorting any Congressmen or -women to the Capitol?

13          A     Not that I know of.

14          Q     Garboard Strake, is that Tom Burgess?

15          A     I don't know who that is.

16          Q     You know Tom Burgess, though, that stayed with you in your room?

17          A     If that's Tampa Tom -- if Tom Burgess is Tampa Tom, then I --

18          Q     Okay. Got it. Okay.

19          A     The only Tom that I remember is Tampa Tom and I don't know what his last  
20       name is.

21          Q     And Tampa Tom stayed in the JW with you, correct?

22          A     Yes.

23          Q     Okay. Bruce Holden?

24          A     Doesn't ring a bell.

25          Q     Frank Marchisella?

1 A No.

2 Q Robert Kennedy?

3 A No.

4 Q Darin Bassett?

5 A No.

6 Q Can you scroll down a little more, [REDACTED] for us?

7 David Kirk?

8 A No.

9 Q Ben Parker?

10 A Nope.

11 Q Sandra Parker?

12 A Nope.

13 Q Jessica Watkins?

14 A I know the name now, I think, you know, from the news articles. And I  
15 think I saw her -- I don't know if it was her or not, I'm pretty sure it was -- during the  
16 President's speech, she was with Kelly's group.

17 Q With Kelly's group -- I know we're getting ahead of ourselves. Kelly's group,  
18 including Jessica Watkins, they were inside the Ellipse, correct?

19 A Yes.

20 Q What was -- what was the plan or why were they inside the Ellipse?

21 A The plan was, since there was supposed to be 8, 10, 12 additional people,  
22 you know, in addition to Ali Alexander and his, I don't know, five or six main staff people,  
23 since there was such a large group, we were supposed to surround them and just kind of  
24 walk them up to where Alexander would be talking at the Capitol.

25 Q Well, I guess, why were you needed inside the Ellipse? Was there a threat

1       that you felt would be inside the Ellipse for Ali Alexander and his five or six people?

2           A    I don't know. I wasn't part of that conversation. I don't know who asked  
3       us. You know, again, I was just told that that's what we were going to do.

4           Q    Okay. [REDACTED] we can take this down.

5           I have a few other names. Don Seekerman (ph)?

6           A    Doesn't sound familiar.

7           Q    William Cook?

8           A    Doesn't sound familiar.

9           Q    Rob Weaver?

10          A    Doesn't sound familiar.

11          Q    Okay. And we'll get into more specifics about the 6th shortly. We're  
12       making our way now to the 5th. I told you we're going to work chronologically.

13          So you get, it looks like, to D.C. late morning, early afternoon on the 5th. You go  
14       to the JW Marriott. What did you do for the rest of the day on January 5th?

15          A    We got there, we checked in, myself and Tampa Tom, that is. Alexander, I  
16       think I either texted him or one of his handlers or assistants. They were not at the hotel.  
17       They were, I think -- I think it -- he might have even said he was at the Capitol stage or  
18       something giving a speech and that he would be back to the hotel.

19          I think he showed up around 5 o'clock. I can't remember. When he showed  
20       up, you know, I introduced myself to him and his security, also Tampa Tom. He did a  
21       speech in Freedom Plaza. There was a stage there, so we just kind of hung out while he  
22       did that speech and then took him back -- walked him back to the hotel. We just kind of  
23       hung out in the lobby for a while, while he went upstairs.

24          At some point, he decided that he was going to go out and eat. So we escorted  
25       him to a hotel where some pizza was delivered to the lobby. It was a different hotel

1 five, six blocks away. I don't remember which one it was. So everybody ate pizza.

2 On the way back -- well, actually, prior to that, he did say that he wanted to do  
3 that meeting at 11 that I mentioned earlier, but on the way back, he said that that wasn't  
4 going to happen and just to be in the lobby at like 6 o'clock in the morning the next day.

5 Q Let's break that down a little bit. Meeting at 11, I do remember you  
6 mentioning it earlier, and I apologize for not remembering the details. What was that  
7 meeting supposed to be about on January 5th at 11?

8 A What he needed the other Oath Keepers, Kelly's group, to do.

9 Q Do you know if that meeting ever took place with Mr. Meggs at all?

10 A No, it didn't. Not to my knowledge.

11 Q Okay. Do you know what even -- like, what he needed to do -- what, I  
12 guess, the atmosphere or what the -- I'm trying to understand what would he need him to  
13 do other than personal security detail? Did you get any indication of what that would  
14 be?

15 A Maybe, you know, logistics, the passes that were needed to get him in to,  
16 you know, the President's speech. That got messed up the next day. It took a while  
17 for one of Alexander's assistants to get Kelly's group the passes they needed. I don't  
18 know what happened with that, other than we didn't meet up with them.

19 There was so many people there. There was a VIP gate. We were all supposed  
20 to meet there, but it got all screwed up. So, you know, the -- Kelly and his group didn't  
21 show up, but myself, Tampa Tom, his security, and his other five or six people all went in  
22 together with Alexander.

23 And then the rest of the Oath Keepers, I don't think they got in for another couple  
24 hours. I'm not sure.

25 Q Got it. And we'll get into that when we get to the 6th. So walk us

1       through. You said -- what time did you escort Mr. Alexander to Freedom Plaza,  
2       approximately?

3           A     When, on the 5th?

4           Q     Yes.

5           A     It was dark is all I can tell you.

6           Q     Did you all escort him anywhere else before Freedom Plaza or was it just  
7       straight to Freedom Plaza?

8           A     No, straight to Freedom Plaza, as far as I remember.

9           Q     So then Mr. Alexander goes to Freedom Plaza, he speaks, and then where do  
10      you go after that?

11          A     Back to the Marriott for a little while and then to the other hotel where they  
12      ordered pizza.

13          Q     Where was the other hotel? Was it the Willard?

14          A     I don't remember.

15          Q     Was it close to the JW Marriott?

16          A     We walked. It took us about 10 minutes to walk.

17          Q     Do you know who you met up with for the pizza when you got there?

18          A     There was a lot of people there, probably 20 or 30. We were in like a little  
19      back area. There's like a little restaurant. There was probably 20 people there.

20          Q     Was Mr. Roger Stone there?

21          A     No, not that I saw.

22          Q     Okay. What -- I guess, when you were at Freedom Plaza, what did you  
23      observe? Did you observe any threats? What did you see?

24          A     No. Everything was fine.

25          Q     What was the general tone or atmosphere at the Freedom Plaza rally on

1       January --

2           A     There was just a lot of people.

3           Q     Did you do any type of advance work or prep work before you went to the  
4     Freedom Plaza --

5           A     No.   Their -- their security -- like I said, their security was in charge.   I just  
6     did what they told me, which was basically just kind of stand there.

7           Q     While you were at the hotel after Freedom Plaza and after going back to the  
8     JW Marriott where there was pizza, what was being discussed during this dinner?

9           A     I don't know.   I wasn't -- I was probably -- there was like two little entrances  
10    into this back area, so I was at one, Tampa Tom was at one.   And then their -- or his  
11    security was also at the entrances.   So we stayed clear of any discussions or anything.

12          Alexander was in a booth kind of in the middle.   There was a long table that had,  
13    I don't know, 15 people, and then there's maybe another five people in the booth with  
14    Alexander.

15          Q     Did you recognize anybody in the booth with Mr. Alexander?

16          A     No.

17          Q     How long did you all stay at this pizza place that night?

18          A     I don't know for sure, hour and a half maybe.

19          Q     Who were you with while Mr. Alexander was in the booth?   You were with  
20    Tampa Tom, but anyone else?

21          A     Tampa Tom and then also his security on and off.

22          Q     Okay.   Was Kelly Meggs and any of those Oath Keepers with you all that  
23    night?

24          A     No.

25          Q     I want to go -- [REDACTED], can we pull up exhibit 12?

1           I'm going to show you some pictures and you, please, just let me know if these  
2       individuals were part of the security that you were -- part of the people that you were  
3       providing security for on January 5th and 6th.

4           So, of course, we have Ali Alexander. This is who you're providing security for  
5       primarily. Is that correct?

6           A     Yes.

7           Q     Okay. The second page, Michael Coudrey. Do you recall providing him  
8       security --

9           A     No.

10          Q     No? Okay.

11          You can keep going, [REDACTED].

12          Nathan Martin?

13          A     No.

14          Q     Okay. Alexander Bruesewitz?

15          A     He looks familiar, but I don't know why.

16          Q     Okay. Was he -- because you were providing for Ali, but there were other  
17       people providing it for other, I would say, Stop the Steal influencers, correct?

18          A     Yeah. Actually, that Nate guy kind of looks familiar. He might have been  
19       there. I'm not sure.

20          Q     Okay. He might have been there at the JW --

21          A     No. Maybe not. The guy I was thinking of is younger.

22          Q     Okay. And then Alexander Bruesewitz you vaguely remember or vaguely  
23       familiar?

24          A     I'm not going to say I'm 100 percent sure he was there, but he just looks  
25       familiar for some reason.

1           Q    Okay. Let's go to the next one. Brandon Straka, was he part of the  
2 group?

3           A    Not that I remember.

4           Q    CJ Pearson?

5           A    Not that I remember.

6           Q    Okay. Ed Martin?

7           A    Not that I remember.

8           Q    Thank you, ████████.

9                   So other than Ali Alexander, who do you end up providing security for?

10          A    Ali Alexander is who I was --

11          Q    That's it?

12          A    Yeah.

13          Q    Okay.

14          A    I mean, you know, we're loosely responsible for the people that were  
15 hanging out with him, but I think I even either told the security -- his security or whoever,  
16 if something happens, our primary concern is Alexander.

17          Q    While you were with Alexander the entire evening, do you recall him  
18 discussing anything about January 6th?

19          A    No, I don't think so, unless just they were talking about times or something,  
20 but I don't remember any specific discussion.

21          Q    So let's go through that. Were they telling you how they thought  
22 January 6th was going to go, the plans, like, what time you're going to leave the hotel,  
23 what time you were going to go to the Capitol?

24          A    No. That's -- that's what time that -- or that's why that meeting was  
25 supposed to happen at 11, so they could tell us, but it never happened. So at some

1 point, I think, you know, after they had pizza and everything and we got back to the  
2 Marriott, I think at that point he said just be at the lobby, it was either 5:30 in the  
3 morning or 6, I can't remember what. And we just kind of played it by ear.

4 Q So you went in to January 6th not really knowing how the day was going to  
5 unfold?

6 A Right. I was -- I was a little angry about it, but, you know, it was very  
7 disorganized.

8 Q Did you hear Mr. Alexander or anyone in his group having any conversations  
9 at all with the White House?

10 A No.

11 Q What about congressional members? Did you hear any talk about  
12 congressional members?

13 A No, not that I remember.

14 Q Did you recall seeing a woman named Ms. Caroline Wren or hearing  
15 conversations about her?

16 A Not that I remember.

17 Q Was Mr. Stone around at all on January 5th and 6th with the group that you  
18 were with?

19 A No, he wasn't with the group. He did -- I think he did speak on the 5th at  
20 Freedom Plaza, because I do remember seeing him coming in as we were going out.

21 Q Do you know why Mr. Stone didn't come to the rally at the Ellipse on  
22 January 6th? Did you hear about why he didn't come at all?

23 A No.

24 Q And, again, who was providing personal security detail for Mr. Stone on  
25 January 5th and 6th?

1           A    I think it was Josh and some other Oath Keepers.

2           Q    Would Mr. Green, would he have probably been in that Mr. Stone --

3           A    I don't know.

4           Q    Were you aware that Mr. Green was serving as like an operational leader,  
5       ops lead?

6           A    Oh, I'm sorry. Mr. Green is Mike, Whipit?

7           Q    Yeah, Whipit.

8           A    Yeah. I think he was kind of in charge of -- overall in charge of the whole  
9       D.C.

10          Q    I guess, why do you need an ops leader for personal security details? Like,  
11       in all your years of experience of doing personal security detail, did you have ops leads?

12          A    In all my years of doing personal security details, it was nothing like what the  
13       Oath Keepers wanted to do, and it was -- you know, again, they wanted to wear their  
14       helmets and their vests, and I made my point known that it wasn't the way things were  
15       done. And, you know, I -- I told them that, but I wasn't listened to so, you know, I shut  
16       up about it.

17          Q    So what was the point of having an ops lead, from your understanding?

18          Q    Did you receive direction from the ops lead? Like, what was the ops lead doing?

19          A    I didn't even think about it.

20          Q    Did you all provide personal security for Alex Jones? And, if so, who was it,  
21       for January 5th and 6th?

22          A    Not that I know of. I don't remember the Oath Keepers being assigned to  
23       him.

24          Q    You did say, though, going into January 6th, let's say, the night of the 5th and  
25       the morning of the 6th, you were aware that you would be going from the Ellipse to the

1 Capitol afterwards?

2 A Yes.

3 Q What was supposed to be happening at the Capitol, based upon your  
4 understanding?

5 A That Alexander was supposed to give a speech.

6 Q Was he giving a speech with congressional members or just by himself?

7 A I don't remember. Again, it was discussed, as you saw in those texts that,  
8 you know, some congressional people wanted to -- needed an escort or possibly needed  
9 the escort from the President's speech to the Capitol, but I don't know who was going to  
10 stick around or anything along those lines.

11 Q What was the route? Did you all discuss the route that you were going to  
12 march from the Ellipse to the Capitol?

13 A No. Again, that's what would have been nice if we did our, you know, that  
14 briefing on -- on the 5th at 11 p.m. It would have been nice to know. But at some  
15 point on the 5th, I did ask Alexander, hey, where do you want the rest of the Oath  
16 Keepers, you know, because when they finally showed up, you know, what do you want  
17 them to do? He's, like, I want them to escort -- help escort my people.

18 So after the President's done talking, come up to the front of the stage, they're  
19 going to let us through to kind of cut across the grass. I don't know what street we  
20 would've ended up on. But after the President was done talking, Alexander, his two  
21 security people, and four or five of his aides were let through, but they wouldn't let  
22 anyone else -- you know, myself, Tampa Tom, or the rest of the Oath Keepers go through  
23 the front.

24 I don't know if it was the Secret Service that let Alexander through or D.C. Police  
25 or who, but somebody did. So that's how we got separated from him.

1           Q     So someone, it seemed like it was special access, let Mr. Alexander and his  
2 aides through but wouldn't let you through?

3           A     Correct.

4           Q     Okay. We'll get back to that point as well. When you were going into  
5 January 6th, did you think that the President was going to join you all at the Capitol?

6           A     I didn't know. I didn't hear anything about that.

7           Q     Did you have an estimate of how big the crowd size would be at the Ellipse  
8 or at the Capitol?

9           A     No.

10          Q     What were you thinking the crowd size would be in your mind on January  
11 5th or 6th?

12          A     I just knew there'd be a lot of people.

13          Q     Had you seen the permit or anything for the Capitol?

14          A     No. No.

15          Q     Okay. And, again, what threats, other than Antifa -- and just let me know if  
16 Antifa was the only one -- were you tracking for January 6th?

17          A     No others that I remember.

18          [REDACTED]. Does any of the staff or Ms. Murphy have any follow-up questions  
19 for Mr. Morelock?

20          Okay.

21          BY [REDACTED]:

22          Q     All right. So let's move on to the 6th. I know you've mentioned this a  
23 little bit, but I want to go through in the same kind of detail, what -- approximately, what  
24 time did you wake up and assemble and then go over to the Ellipse with Mr. Alexander?

25          A     We met down in the lobby at 5:30, 6 a.m. on the 6th. There was two

1 different golf carts, so we took the golf carts to the Ellipse -- is that how you say it?

2 Q Uh-huh.

3 A Okay. So we took the golf carts to the Ellipse. We went to the VIP gate  
4 where Alexander gave them the credentials or something, got us our passes, went  
5 through the security screening, and then up to the -- basically, the front of the stage.  
6 There was like a separate kind of gate where only certain passes were allowed to come  
7 up closer to the stage. So we had those passes.

8 Alexander, one of his security guys and a few of his people were seated, I don't  
9 know, within the first couple rows kind of towards the center of the stage, and they made  
10 the rest of us sit kind of in the back and off to the side.

11 Q Who provided the golf carts for you?

12 A I don't know.

13 Q Okay. Did you all make any stops at all before you got to the Ellipse?

14 A I don't think so.

15 Q And do you recall an incident where Mr. Alexander and others were fighting  
16 over seats or in a discussion with security about where they were supposed to be sitting?

17 A Yeah. There -- there was some discussion. I remember one of the  
18 security people saying that Alexander wasn't very popular with them, but I don't know  
19 the specifics.

20 Q Okay. Did you step up at all to help during this --

21 A No, I didn't see it. I didn't see it. I just -- I just remember one of the  
22 security guys saying one of the -- I guess it was an event security person saying,  
23 well -- because I was, like, I need to go talk to him. He's, like, well, he's not very popular  
24 with us right now, or something like that.

25 Q So you got -- you were separated, it sounds like, from Mr. Alexander inside

1 the Ellipse. Is that fair?

2 A Yes. Inside the VIP section in front of the stage, we were separated.

3 Q Approximately how far away were you from him at this time?

4 A I couldn't see him from my seat. Maybe, guessing, kind of at a diagonal,  
5 because I was off -- if you're facing the stage, I was to the right of the stage, a little more  
6 than halfway back, maybe 20 yards from him, I guess, in a diagonal kind of.

7 Q So what's your role when you're 20 yards away from him inside, were you  
8 just at that point a spectator of the rally?

9 A Yep.

10 Q Okay. Can we pull up exhibit 6, please, [REDACTED]? We can scroll down to the  
11 bottom part of this page.

12 So this is in the D.C. OP January 6th signal. Doesn't appear you're in this  
13 because --

14 Scroll up a little bit, [REDACTED]

15 So at 8:55 a.m., it looks like Stewart Rhodes sends this group a message, "Message  
16 to Gator and his team from Whipit," who's Jeff Morelock.

17 We can scroll down.

18 And this is on January 6th at 8:55 a.m.

19 A Yes.

20 Q It says: If you get your passes to go into the Trump event, go into the three  
21 green crane/light towers and come to the fence between the green cranes and the stage  
22 and Whipit will be able to see you. His text is not working. Cell calls also spotty. Link  
23 up on food.

24 So did you actually get together with other Oath Keepers inside the Ellipse?

25 A Yes, eventually, after I sent that text. I don't know if I sent that text to -- I

1 think -- you asked me about Whip. I think I did text him, because he was kind of overall  
2 in charge, saying that I got separated from Kelly's group and if you ever get a hold of  
3 them, this is where I am.

4 So I think that's how that -- what you're showing on the screen came about.

5 Q And when you said -- you meant Ali's group, not Kelly's group, right? Did  
6 you say Ali's group?

7 A No. We got separated from Kelly's group.

8 Q Oh, Kelly Meggs' group?

9 A Yeah.

10 Q Kelly Meggs' group was with you with Ali Alexander when you all were riding  
11 over to the Ellipse as well?

12 A No. No. They were coming from the different hotel and we were, again,  
13 supposed to meet by the VIP, but there were so many people that we never got together  
14 until after the event had started.

15 Q But it sounds like you and Kelly Meggs' group did reunite inside the VIP area?

16 A Yes.

17 Q Thank you, [REDACTED]. You can take those down.

18 What were you all doing during the rally? Like, what was going on with you and  
19 Kelly's group?

20 A I didn't sit with Kelly's group. It was just me, Tampa Tom, and Alexander's  
21 other security. We were sitting in the right. The event security made Kelly's Oath  
22 Keeper group sit in the very back row in the middle.

23 Q Are you familiar with Kelly's group having to remove their gear and leave it  
24 outside of the --

25 A Yes. Yes.

1 [4:17 p.m.]

2 BY [REDACTED]:

3 Q Why made you say that?

4 A I kind of wanted to tell them, I told you so, that you didn't need to wear that  
5 in the first place.

6 Q But, I guess, what were they saying about having to leave their gear outside  
7 of the event?

8 A Just that they had to leave their gear.

9 Q What gear was it that they had to leave outside?

10 A Their helmets and vests.

11 Q Do you know if Kelly's group or you were working with the Secret Service at  
12 all inside the Ellipse?

13 A I wasn't working with the Secret Service, and I don't think they were either.

14 Q Did you hear them mention anything, especially Ms. Watkins mention  
15 possibly working with the Secret Service inside the event?

16 A No, I don't remember that.

17 Q Were you or Kelly's group responsible for any jobs or any tasks inside the  
18 Ellipse?

19 A No.

20 Q What did you observe during the actual rally at the Ellipse? What was the  
21 mood? What was the atmosphere like? What were you thinking as you were --

22 A Yeah. I was so cold. You know, being from Florida, it was freezing up  
23 there. My jacket was too thin. I was basically bundled up and had my jacket way  
24 above, as much -- as high as I could get it over my head. I was just trying not to freeze.  
25 You know, I didn't really pay attention to any of the speakers. I was just freezing to

1 death.

2 Q Gotcha. I guess, were speakers still speaking when you guys left, when Mr.  
3 Alexander left?

4 A I don't think so. I think the President had just finished talking. I'm not  
5 sure.

6 Q So none of the speakers stood out to you, none of their rhetoric about going  
7 to the Capitol? I mean, I know you said you're not a political guy. Did you now start to  
8 think this is a super-political event and day overall?

9 A I really wasn't paying much attention.

10 Q Okay.

11 I guess, just going back to the gear left outside of the Ellipse, like, help us  
12 understand the magnitude, right? Was this just, like, a helmet and a plate vest, or was it  
13 more than that?

14 A I don't know what everybody had. I just know the majority of them were  
15 wearing helmets and, you know, the ballistic vests. But I didn't see them that day  
16 before they came in, so I don't know what they were wearing.

17 Q So Ali Alexander leaves. He goes to the special access point. You're not  
18 allowed to go through that special access point. So help us understand how you got out  
19 of the event.

20 A We met up with four or five of his people just outside of the VIP gate. It  
21 was still inside, you know, the secured area by the Secret Service, so it was still in the  
22 secured perimeter, but it was outside of the VIP section.

23 I think maybe one of his assistants -- it was a female. Her name might have been  
24 Mallory. I'm not sure. But someone coordinated their five or six people into that area  
25 where we met up with Kelly and his group, and we all walked out of the Ellipse secure

1 area and onto a street. I don't know what street it was.

2 So, at that point, Kelly said that they were going to go put their gear on and we  
3 were all supposed to go over there together. But that's when the crowd just, you know,  
4 meshed in with us and we got separated.

5 So it was myself, Alondra, Caleb, and there was a short African-American lady. I  
6 think her name might've been Chantel or Chanel. She was kind of heavyset. And I  
7 guess she had, at a past event or something, been a speaker or somehow was associated  
8 with Alexander.

9 So it was our little group, got separated from the main Oath Keeper group. We  
10 somehow made our way to Pennsylvania Avenue and started walking towards the  
11 Capitol, because I was just gonna try to get in touch with either Alexander or -- I think it  
12 was Mallory and see if we could meet up once we got to the Capitol, because I didn't  
13 know where his stage was or where he was supposed to, you know, give his speech.

14 So, as we're going up Pennsylvania Avenue, we got to Freedom Plaza, where -- it's  
15 the end that has the guy on a horse. I don't know if you're familiar with --

16 Q Oh, wait. I'm going to stop you, because we're going to walk through this.

17 A Okay.

18 Q So I'll go through that.

19 At this point, though, did you understand that Ali was gonna be leading a march to  
20 the Capitol? Like, what was your understanding of this march --

21 A No. I just thought he was going to be giving his speech there.

22 Q And I don't recall if you answered this, but what was the mood inside the  
23 Ellipse? Like, were people angry? Were they cheering? Like, what was the mood?

24 A It just seemed like a regular crowd. I mean, nothing stood out as far as  
25 being a problem.

1           Q     So, comparing the January 5th Freedom Plaza crowd to the Ellipse crowd,  
2     we've heard from other witnesses that it was a very different environment. You're  
3     telling me today it was the exact same environment?

4           A     As far as I know. It didn't seem -- you know, I mean, I -- nothing stood out  
5     to me as far as being a problem.

6           Q     And --

7           A     I was --

8           Q     I'm sorry.

9           A     Yeah. I was, you know, more specifically just doing what I do as a  
10   bodyguard, looking for immediate threats, and not paying attention to the whole  
11   situation.

12          Q     Got it. Okay.

13          And, again, I think you might have touched on this, but just to make sure we're  
14   clear. Who did you leave with? Tampa Tom?

15          A     Who did I leave with?

16          Q     Yes.

17          A     From -- after the speech was done, the President was done speaking? No, I  
18   left with -- somehow I got -- Tampa Tom, I got separated from him. So who I left with  
19   was four or five of the Alexander people, Caleb and Alondra, the two other Oath Keepers.  
20   But Tampa Tom I got separated from.

21          Q     And was Ms. Propes -- was she by herself or was she with her husband?

22          A     She was by herself, as far as I know.

23          Q     Okay. And what was the approximate time that you left? Do you recall  
24   that?

25          A     I don't remember. Early afternoon.

1           Q     When you left the Ellipse, were you tracking that there might've been any  
2     kind of trouble at the Capitol at all?

3           A     Not when I left. The first I heard of problems at the Capitol was after we  
4     got there.

5           Q     Okay. So you weren't tracking that there was anything going on at the  
6     Capitol until you actually arrived at the Capitol?

7           A     Correct.

8           Q     All right.

9           So let's go back then. When did you actually get back with Mr. Ali  
10   Alexander -- you mentioned Freedom Plaza. When did you actually reconnect with him?

11          A     On the 6th, after the speech?

12          Q     After the speech, you walked --

13          A     I didn't.

14          Q     You didn't get back with him?

15          A     When he went through that secured area, I didn't see him again.

16          Q     You didn't see him again the rest of the day?

17          A     Correct.

18          Q     Okay.

19           So, then, walk us through -- I think you were starting this then. So go back to  
20     walking us through how you got to the Capitol, who you were with. Were you providing  
21     security at this time?

22          A     We were looking out for the lady, Chantel or Chanel or whatever her name  
23     was. She was having trouble walking, to the point where she started crying, so we had  
24     to stop several times, because her feet were hurting. So that slowed us down also.

25           So we got kind of adjacent to where that horse is, the horse statue at Freedom

1 Plaza.

2 Q Yep.

3 A The Oath -- Kelly and his group, we kind of met up there, not on purpose but  
4 on accident. Somehow we got ahead of them. So then we all started walking as a  
5 group again up Pennsylvania, but the Oath Keepers were walking a lot faster than this  
6 lady could walk, with her sore feet. So I stayed back with her, Alondra stayed back with  
7 her, and I think Caleb went on with Kelly and his group. So we got separated again.

8 When we got to the Capitol, the two groups kind of met again. They cut through  
9 some grass; I don't know north, south, east or west up there. So they went through  
10 some grass, and they ended up at a security gate.

11 The arms were down, but there was a female D.C. -- or not D.C., but Capitol Police  
12 officer there. There were no barricades on the sidewalk, so a lot of people were just  
13 going up the sidewalk. She wasn't making any effort to stop anybody or tell anybody if  
14 it was a restricted area or not. So I assumed that that was open to the public.

15 Q I want to stop you there.

16 A Okay.

17 Q You left after the President's speech. You didn't hear noise or see tear gas  
18 or anything like that at the Capitol? I know you understand the Capitol Police officer  
19 wasn't saying, "Stop, this is a restricted area," but you didn't hear any commotion, see  
20 any commotion, nothing like that?

21 A Not -- we went through that gate, and then we turned left, up some -- it was,  
22 like, a curved, circular sidewalk. So we were kind of on that circular sidewalk. The  
23 Capitol would've been to my right. And that's --

24 Q Actually, that's perfect. That's perfect.

25 [REDACTED], [REDACTED], could you play exhibit 14 for us, please?

1 [Video shown.]

2 █. All right. You can take that down. Thank you, █.

3 BY █:

4 Q So that video was at about 1:48 p.m. of Alex Jones and Ali Alexander arriving.

5 They're ahead of you. You can see all the people; you can hear the whistles and stuff.

6 I guess, tell us again, what were you thinking? And the Capitol is off to the right,  
7 so it appears similar to what you were just saying.

8 A Again, I don't know -- I don't know where I was up there or where that video  
9 was shot. But, again, after I got -- and the first time I knew there was an issue is, we  
10 went through that gate I told you about, probably walked 20 yards around the circular  
11 sidewalk to the left. And, at that point, some people were coming by -- we had met up  
12 with Kelly and his group. But some people came by and said, "The Capitol was  
13 breached. The Capitol was breached." And then I saw some -- a van loaded with riot  
14 police show up. And I was like, we need to get out of here.

15 Q So when did you reconnect with Kelly and his group? Before you got to the  
16 grounds or right when you got in?

17 A Well, we reconnected at Freedom Plaza, but, again, they started walking too  
18 fast, so I stayed back with the lady that couldn't walk. So, after we went through the  
19 gate, probably 20 yards, 30 yards from the gate is when we caught back up with Kelly and  
20 his group.

21 Q What was Kelly and his group discussing at this point? What were they  
22 saying?

23 A They were standing around. Kelly looked at me and said something to the  
24 effect of, what should we do? I said, I think we should find Ali Alexander's group and get  
25 them out of here.

1 Q And what was his response?

2 A He was like, "Well, the Capitol has been breached." And I'm like, "Yeah.

3 We need to stay out of the way of the police." Because more riot cops are showing up.

4 You know, "We don't want to be a part of the problem. Let's get out of here."

5 He's like -- he said, "This is our opportunity." I'm like, well, I'll be fine by myself,  
6 but I'm not going to leave this lady, you know, that can barely walk in this crowd full of  
7 people, you know. Basically, do what you want. But --

8 Q "This is our opportunity." What did you take that to mean?

9 A I took that to mean, based on prior Oath Keeper call-to-actions where we  
10 always help the police, that they were going to try to help with some kind of crowd  
11 control or something along those lines.

12 Q So, in this moment when you're talking about Capitol Police or riot crews  
13 coming and Mr. Meggs tells you the Capitol has been breached and he responds back,  
14 "This is our opportunity," you took that to mean to defend the police officers?

15 A Yes. I had no reason not to.

16 Q Help me understand that.

17 A I had no reason not to.

18 Q Okay.

19 Where did you go afterwards? So you have this conversation with Mr. Meggs.  
20 Help me --

21 A So, after they walked away --

22 Q Wait. How close are you to the Capitol when you're having this  
23 conversation?

24 A We're on the side of it. The building was to my right. Kind of in the  
25 middle on the side.

1 Q So there was the part with all the scaffolding and the inauguration stage.

2 That's the west side of the Capitol. You were on the other side?

3 A I think so.

4 Q Okay.

5 A We were to the left of Pennsylvania Avenue, if that helps.

6 Q That does.

7 [REDACTED] So can we pull up exhibit 15, please, [REDACTED]?

8 So this video is around 2:17. It's Mr. Alex Jones giving a speech on the east side  
9 of the Capitol. We'll play it, and then I'll just ask a few questions about this.

10 [Video shown.]

11 [REDACTED]. Thanks.

12 BY [REDACTED]:

13 Q So Alex Jones gave a similar speech to that on the east side of the Capitol at  
14 2:17 p.m. Did you see that speech?

15 A No.

16 Q Did you hear any discussions about the speech? Are people breaking  
17 through on the left side of the Capitol as you were on the east side of the Capitol?

18 A No.

19 Q Did you see Ali Alexander give a speech on the east side of the Capitol?

20 A No.

21 Q Around what time were you on the east side of the Capitol with Mr. Kelly  
22 Meggs?

23 A I don't remember.

24 Q So I'll just -- I'll give you a time. Mr. Meggs led what's been called by the  
25 DOJ "Stack One" up the steps into the Capitol at 2:36 p.m. You said you were with

1       Mr. Meggs on the east side of the Capitol right before.

2           Did you get the impression he wasn't going to the Capitol with a stack of other  
3       folks in his group?

4           A     I didn't know what they were gonna do. They walked away from me, and I  
5       went to where Chanel was, or Chantel. So it ended up just her and I.

6           And, at one point, I walked a little farther up the sidewalk -- I told her to wait  
7       where she was -- because I was gonna see if I could see a stage or something where  
8       Alexander might be. But I walked, I don't know, 20, 30 yards, saw there was just so  
9       many people there, riot police arriving. I went back to her, and I'm like, "Look, it's safer  
10      if we just leave and go back to the hotel." And that's --

11          Q     Were there any discussions going on in the Signal chats at this time about --

12          A     I wasn't looking at that time.

13          Q     Did you see Mr. Meggs and the other folks actually going up the steps into  
14      the Capitol?

15          A     No. I mean, later I saw a video of it, but --

16          Q     What did you think when you saw the video of it later?

17          A     I was disappointed in them.

18          Q     Were you -- why would you be disappointed if you thought they were going  
19      in to defend police officers?

20          A     Well, because I -- when I saw it, I knew that they had already gone in.

21       Because, at one point, after I got back to the hotel -- because there was also a curfew  
22       gonna be enacted, so we hurried up, got back to the hotel. I walked the lady to a  
23       corner, where her husband picked her up.

24       But later that evening somebody posted a video of them inside the Capitol. And  
25       then I think after that is when I saw -- the next day is when I saw them going in single-file

1 line up the stairs.

2 Q I guess, though, I'm just trying to understand, right, like, they told you, "This  
3 is our opportunity." So you knew there had to be something, and you just told me it  
4 was to defend law enforcement. So where is this disappointment coming from, I guess?

5 A That's after the fact, after I knew that they had gone inside.

6 Q After you'd known they had gone inside, though, couldn't they have been  
7 going inside to defend law enforcement?

8 A It's possible. But when I said I was disappointed in them, it's after I knew  
9 they went inside for whatever political reasons or whatever and they weren't there to  
10 help law enforcement. Once I knew that, then I saw the videos, it might've been the  
11 next day, it might've been a couple days. Again, I didn't take notes for all this stuff. It  
12 was just, you know, I was disappointed. Two days later, I quit the Oath Keepers.

13 Q I guess I'm trying to, though -- did it ever click with you on  
14 January 6th -- those messages of "putting pressure on Senators," did it ever click with you  
15 on January 6th, maybe that's what this is about?

16 A No.

17 Q Okay.

18 A I'm sorry -- I'm sorry if I appear to be an idiot, but, no, it didn't.

19 Q I'm just trying to understand. That's all. We weren't there, so we're  
20 trying to understand what was going through your mind.

21 [REDACTED]. Can we pull up exhibit 5 and go to page 29, please, [REDACTED]?

22 BY [REDACTED]:

23 Q So it looks like in your Florida Oath Keeper chat there is a lot of chats going  
24 on during January 6th. And one, in particular, on page 29 -- can we scroll down here?  
25 Can we go down a little more?

1           Okay. So it looks like Darin Bassett sends a text.

2           Maybe a little further down.

3           Do you see it? Maybe it's above it.

4           There's a message from Darin Bassett about how people are on the Capitol steps,  
5           right?

6           So you're not tracking any -- there it is. "More cops armed with M4's North  
7           Capitol steps."

8           You're not tracking any of these messages at all while you were --

9           A       No, not until after I got back to the hotel, is when I think it was the first time  
10          I looked at any of the chats.

11          Q       Okay. And were you tracking the South Carolina Oath Keepers doing  
12          anything, like, an operation, at all?

13          A       Not to my knowledge, no.

14          Q       Same question regarding the second stack that went in that was an Oath  
15          Keepers stack.

16          A       I don't know anything about that either.

17          Q       So you were just, like, not listening in on the Signal chat or talking to  
18          anybody, other than when Mr. Meggs said, "Now is our opportunity"? That was the last  
19          time you were really talking with anybody?

20          A       Until about maybe 7, 8 o'clock at night. I sent out a text. I think it was on  
21          the Florida chat; I don't remember. You know, I asked, "Is everybody okay? Did  
22          everybody make it back to the hotel?"

23          A couple people -- I don't remember who they were -- checked in and said, "Yeah,  
24          we made it back."

25          And then I said, "Okay. Somebody pick me up tomorrow morning at 7:00."

1 [REDACTED]: Can we go to page 30 of this exhibit, [REDACTED]?

2 BY [REDACTED]:

3 Q And just help me square this. Because you legit, it seems, at, like,  
4 4:30-something -- and I'll give you exact times.

5 Scroll down to Morelock -- or "Whipit."

6 So 4:43: "Whipit and Garbord and our protectees are safe."

7 Isn't Ali Alexander your protectee?

8 A I don't remember texting that. I don't know who Garbord is -- or I don't  
9 remember. If that text came from me, I have no idea what I meant by that.

10 Q Is it fair to say that you're telling the group that you and Ali Alexander are  
11 safe?

12 A Oh, you know what? Maybe Garbord is Tampa Tom.

13 Q That's what I was guessing earlier.

14 A Okay. Yeah. So, yeah, then maybe Garbord is Tampa Tom, and I don't  
15 remem- -- until now. That tells me that that is Tampa Tom's last name. So perhaps I  
16 asked him that day, you know, when I sent that text that we're back safe.

17 Q Yeah. I'm more worried about -- or focused on the "protectees" part of it.  
18 Who were the protectees that you're putting in this chat?

19 A Alexander, I guess. Maybe his group was back by then. I told you I didn't  
20 pay attention to time. You know, it just -- you know, it was very cold, and, again, I  
21 wasn't paying any attention to the time.

22 Q I'm not asking about the time. I'm looking at the timestamp right here, and  
23 it says 4:33.

24 I guess I'm just -- so were you just lying to the group when you said the  
25 protectees, as in Ali Alexander, are safe, if you didn't know?

1           A     No. I think that we were probably all back at the hotel, or I doubt I  
2 would've sent that.

3           Q     Do you recall checking in again with Ali Alexander at 4:30-ish in the  
4 afternoon at the J.W. Marriott?

5           A     You know, I remember talking to the person I think is Mallory, because, right  
6 after I sent that, I think at some point she texted me and said they were gonna try to have  
7 food delivered because there was a curfew. But I didn't hear back from her about the  
8 food or anything else, so --

9           Q     You weren't going off what you saw. It was, like, a message communique  
10 to you from this Mallory person?

11          A     Correct.

12          Q     Okay.

13          [REDACTED] Can we go up a little bit on this page 30, [REDACTED]?

14          BY [REDACTED]:

15          Q     It's a message from "Sea Deep." He says, "At my FOB. Standing by if  
16 needed."

17          I take "FOB" to mean "forward operating base," again, similar to QRF-type  
18 language. What does this mean?

19          A     I don't know.

20          Q     And this is at 3:56.

21          A     I do not know.

22          Q     So you're telling me you don't know anything about a QRF or FOB, "This is  
23 our chance"? Like, you're not tracking anything at this time?

24          A     No, I acknowledged to you earlier that I knew the QRF was going to wait in  
25 Virginia. But I didn't know anything about the FOB, whatever that is.

1 Q The forward operating base.

2 A Yeah. I don't know what that meant or what that person's talking about.

3 Q Okay.

4 Did you meet up with Mr. Stewart Rhodes or Mike at the Capitol around 4:00  
5 p.m.?

6 A No.

7 Q Were you with Mr. Ali Alexander when he recorded a video on the rooftop in  
8 D.C. after the breach --

9 A No.

10 Q -- of the Capitol?

11 A No.

12 Q What time -- if you sent that message around 4:33, compared to when you  
13 sent that message, when did you get back to the hotel?

14 A I don't know. I don't remember.

15 Q What was your understanding of what the Oath Keepers were doing at the  
16 Capitol as, you know, you were walking back and at the Capitol?

17 A I didn't know.

18 Q And you were just relying that Ali Alexander was safe because of the  
19 message you received from the woman with the sore feet?

20 A Yes -- no. It wasn't the woman with the sore feet that sent that.

21 Q Oh, it was the Mallory woman, correct?

22 A Yes.

23 Q Tell me how your understanding of what folks did that day unfolded as the  
24 evening went along.

25 [REDACTED] And we can just scroll, for example -- let's just scroll these

1 messages, [REDACTED].

2 BY [REDACTED]:

3 Q So you submit at 4:38 -- 4:33. That means you have said this. You're on  
4 the Signal chat at this point. People got tear gassed and pepper sprayed. "Just did the  
5 same."

6 What are you thinking is going on if everyone got tear gassed but you didn't?

7 A Well, I wasn't there, so I knew I wasn't going to get tear gassed. I know  
8 how riot police work. That's why I wanted to get off the property, so I wouldn't, one, be  
9 in their way was the main thing. I knew people were gonna get tear gassed and pepper  
10 sprayed and, you know, whatever other tactics they were going to use. So I knew it was  
11 in my best interest, and anybody that would listen to me, to get away from the Capitol  
12 and get back in the hotel, where it was safe.

13 Q Did you have any fear that night that you might get, you know, lumped in  
14 with this group of folks who had just gone into the Capitol?

15 A No. I knew I didn't do anything illegal. I didn't know of any plans or  
16 anything, so I knew I could not be lumped in. I knew I might have some explaining to do,  
17 but I knew I didn't commit any crimes.

18 Q Got it.

19 When did you leave the D.C. area?

20 A The next morning, on the 7th. Kelly Meggs picked me up. If you want to  
21 know, his wife, Connie, was with him. Joe was there, and I think Caleb was there.  
22 Yeah, Caleb was there. And Tampa Tom squeezed in with us. And we drove back to  
23 the Comfort Inn in Virginia, got in separate vehicles.

24 Tampa Tom didn't ride with us back to Florida. He went with someone else; I  
25 don't remember who. But myself, Kelly Meggs, his wife, Joe, and Caleb drove back to

1 Florida.

2 Q Okay. And did you see Ali Alexander the day after the event?

3 A No.

4 Q What was the mood of the individuals as you all were leaving D.C. the next  
5 day?

6 A They seemed worried.

7 Q What were they saying they were worried about?

8 A Just that they might have done something to get them in trouble. Again,  
9 me being an ex-cop, they weren't very vocal about any of this, because they knew,  
10 basically, how I thought.

11 I remember one discussion where one of them said something about they couldn't  
12 believe that one of the rioters was shot, the person that was going through the window  
13 inside the building. I said, "I absolutely understand that, and had I been that police  
14 officer, I probably would've taken that shot too." You know, and that made me kind of  
15 unpopular with them also.

16 But, you know, I don't know if they trusted me to talk in front of them. They did  
17 say that they did try to help the police, that at one point a Capitol officer was getting  
18 surrounded by some stairs and they kind of shooed some protestors, or rioters, I guess, at  
19 this point, away from that particular officer.

20 And then they also told me that a Capitol Police officer told them to go guard a  
21 window. But they didn't elaborate on any of that.

22 Q Okay.

23 I guess you just told us about the individual that was shot. Did you express  
24 disapproval overall about what had happened the day before?

25 A Yes.

1           Q     What did you say, like, on the way back?

2           A     I think just -- I couldn't help myself, but, at one point, I think I said, you  
3     know, I told you so, that we needed to get the people we were supposed to protect and  
4     get off the Capitol Grounds and get out of the way.

5                 But then I shut up, because I didn't want them to throw me out on the side of the  
6     road, and it was a long walk back to Florida.

7           Q     When did you all arrive back in Florida?

8           A     It was probably 11:00, 12:00, right around midnight I guess.

9           Q     Of January 7th?

10          A     Correct.

11          Q     So, I guess, just thinking -- we've gone through January 5th and 6th and the  
12     lead-up to it. Thinking big picture, right -- you mentioned there was QRF. You were  
13     familiar with that. You mentioned how you saw guys getting out of the car --

14                 [REDACTED]. You can take the exhibit down, [REDACTED]

15                 BY [REDACTED]:

16          Q     You mentioned how you saw guys getting out with guns and ammunition in  
17     the Virginia hotel. So that tracks to me that you were kind of thinking that this could go  
18     sideways.

19                 And then on January 6th you heard Mr. Kelly Meggs talk about, "This is our  
20     opportunity." And instead of going with him to defend police officers, which you  
21     thought he was going to do, you walked away.

22                 So, in my mind, you walked away because you knew there was, like, a possibility  
23     that this could go wrong, right?

24          A     No, sir. You're not correct at all. I walked away with the lady that was  
25     part of Alexander's group who it was my duty, when I volunteered to protect her, to get

1       her out of the crowd, out of the situation, away from any danger, you know, and off the  
2       property.

3           Q     But you felt no discomfort over Mr. Meggs saying, "This is our opportunity"?  
4       That just sat perfectly fine with you on January 6th?

5           A     Yes. Yeah. Again, it's just based on what we had done in the past. We  
6       had always helped the police. So, you know, it seemed perfectly reasonable that that's  
7       what they were gonna do.

8           Q     I'm just trying to reconcile this. You talked about hotheads and other stuff,  
9       but now you're saying you were perfectly comfortable with the situation. That doesn't  
10      seem to go hand-in-hand.

11          A     Well, I'm sorry you believe that.

12          Q     No, I mean, help me -- help me get to the point where it makes sense, right?  
13       You were like, I didn't want to be associated with the hotheads, which I'm assuming were  
14       Mr. Meggs's group, and then you walked away. Like -- but you didn't sense any type  
15       of --

16          A     Sir, nothing that happened that day made sense. It was a -- it was tragic.  
17       I mean, it just -- you know, people lost their heads. And, you know, I did what I could to  
18       protect myself, to protect the people that, you know, I was supposed to protect, and get  
19       out of law enforcement's way because I knew they were coming in hot and heavy.

20          And, you know, like I said earlier, I told Kelly, "We need to get out of here and get  
21       out of the way." He made the decision to go do whatever he did. So, you know --

22          Q     So, I guess, do you take January 6th as people losing their heads and not as,  
23       like, a pre-planned opportunity?

24          A     It seemed more, to me, spontaneous, a spontaneous event, instead of a  
25       planned event.

1                    [REDACTED] Do any other staff members have any other questions about  
2 January 5th or 6th?

3                    Okay.

4                    BY [REDACTED]:

5                    Q     So, looking now in retrospect, just walk us through how January 6th, to the  
6 best of your knowledge, affected the Florida chapter of the Oath Keepers.

7                    A     I don't know. I quit, you know, within a day or two. So I know several of  
8 them got arrested, so I don't know if they're still a group or what's going on with them.

9                    You know, I don't -- I don't like reading those kind of articles or anything, so I don't  
10 follow that. I've got just about any kind of keyword for "Oath Keepers" or "riot" or  
11 "January 6th" blocked on whatever I can block.

12                  It was a terrible day, terrible situation, and I don't want anything to do with it. I  
13 hate talking about it.

14                  Q     Did you not talk to, like, Ms. Propes or anyone else the day after, like, "Wow,  
15 that was crazy"? Nothing like that?

16                  A     Kelly Meggs sent me the -- I guess it would be the -- either the 7th or 8th -- I  
17 think it was probably the 8th -- he sent me a picture of the guy that was stealing the  
18 podium that was all over the TV, sent me a picture, saying, "This guy shouldn't be hard to  
19 find." And why he sent me that, what he meant, I don't know. I think I probably just  
20 replied with "LOL" or something.

21                  And, you know, I ended up blocking as many Oath Keeper numbers as I could,  
22 because I don't want to hear from them or be in touch with them.

23                  Q     Were you tracking at all -- I know you mentioned Ranger Doug earlier.  
24 Were you tracking the North Carolina chapter of the Oath Keepers disaffiliating with the  
25 national chapter of Oath Keepers after the fact?

1           A    No, I don't remember that happening, or I didn't hear about it, I don't think.

2           Q    Did you all stop in North Carolina on the way back?

3           A    No.

4           Q    So -- and this is another just, like, big-picture Oath Keepers -- let's stick  
5        pre-Jan. 6th. Do you know who was responsible for maintaining the financial records of  
6        the Oath Keepers?

7           A    No.

8           Q    How about for the Florida chapter?

9           A    No.

10          Q    Do you know if the dues were handled locally or nationally? Do you recall  
11        that?

12          A    I think we paid nationally on the website, I believe.

13          Q    Did you all take -- as the Oath Keepers, did you solicit donations? And, if  
14        so, was it done by chapter or nationally?

15          A    I think there was a donation link on their website.

16          Q    Do you recall the Oath Keepers using any form of cryptocurrency?

17          A    No.

18          Q    Do you know who was responsible for spending the money in the chapter or  
19        the national level for the Oath Keepers?

20          A    No.

21          [REDACTED]    Do any other staff members have any questions before we wrap  
22        up?

23          All right.

24          Well, thank you, Mr. Morelock, for sitting here and talking to us. We really  
25        appreciate it.

1           And, with that, we will go on recess. So thank you.

2           The Witness. Thank you.

3           [Whereupon, at 4:51 p.m., the deposition was recessed, subject to the call of the

4           chair.]

## 1                             Certificate of Deponent/Interviewee

2

3

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

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10                              Witness Name

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14                              Date

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