

1  
2  
3  
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.

8  
9  
10  
11    DEPOSITION OF:   GEORGE MEZA  
12  
13  
14

15                         Wednesday, March 16, 2022

16  
17                         Washington, D.C.  
18  
19

20                         The deposition in the above matter was held via Webex, commencing at 10:06  
21                         a.m.

1

2       Appearances:

3

4

5       For the SELECT COMMITTEE TO INVESTIGATE

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

7

8       [REDACTED] STAFF ASSOCIATE

9       [REDACTED] INVESTIGATIVE COUNSEL

10      [REDACTED] CHIEF CLERK

11      [REDACTED] PROFESSIONAL STAFF MEMBER

12      [REDACTED] INVESTIGATIVE COUNSEL

13      [REDACTED] INVESTIGATIVE COUNSEL

1

2 [REDACTED] I think we can go on the record. It's 10:06.

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

6 This will be a staff-led deposition, though members may choose to join and ask  
7 questions.

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

10 The Witness. Sure. My name is George Meza, M-e-z-a.

11 [REDACTED] And my name is [REDACTED] I'm an investigative counsel with the  
12 Select Committee. With me from the Select Committee staff are [REDACTED]  
13 investigative counsel, and [REDACTED] also investigative counsel. There are no  
14 members present currently.

15 Under House deposition rules, neither committee members nor staff may discuss  
16 the substance of the testimony today unless the committee approves release. Note that  
17 under House rules, you may have an attorney present, but counsel for other individuals or  
18 other attorneys from other government agencies may not be here and are, therefore,  
19 not.

20 I'll just note for the record that you are not represented by counsel today, but  
21 you're aware that you have that option.

22 I will also note that what's been previously marked as exhibit 1 is the select  
23 committee's February 10, 2022, subpoena for Mr. George Meza, and the House  
24 deposition rules are included in that exhibit.

25 As I mentioned earlier, before we went on the record, there's an official reporter

1 transcribing the record of this deposition. So just to make their lives a little bit easier, if  
2 you can wait until I finish my question before you start speaking to answer the question,  
3 and then in turn I'll wait until you finish your answer so that we're not talking over each  
4 other.

5           The Witness. Sure.

6                 [REDACTED] It's obviously hard to record two people talking at the same time.

7                 And then, relatedly, just make sure that you're using verbal responses, so a yes or  
8 a no, as opposed to a head nod. The official reporters can only record what we say.

9                 And then today we just ask that you provide complete answers based on the best  
10 of your recollection. If the question is not clear, feel free to ask for clarification or ask  
11 me to reword it. And then if you don't know an answer to a question that I've asked  
12 you, just say so.

13                 Does that make sense?

14                 The Witness. Yes.

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

20                 And then also this is a warning that we provide everybody that we speak to, but I  
21 just want to remind you that it's unlawful to deliberately provide false information to  
22 Congress. Providing false information could result in criminal penalties for perjury  
23 and/or providing false statements under 18 USC 1001, which makes it illegal to provide a  
24 false statement to a congressional investigator like myself or the other folks that I  
25 introduced earlier.

1           That being said, I want to be clear that this is a congressional investigation and not  
2           a criminal investigation. This proceeding is separate and distinct from any current  
3           criminal proceedings by the Department of Justice. We're not a partner in their  
4           processes and we're not working together.

5           Is that clear?

6           The Witness. Yes.

7                   [REDACTED] Okay. And then we might be talking for a while, so just let me  
8           know if you need any breaks at any point. I'm going to try to take a break about every  
9           hour, but sometimes I forget, so feel free to stop me and let me know that you need a  
10          couple minutes.

11          The Witness. Sure.

12                  [REDACTED] And then, I'll be asking most of the questions today, but like I've said  
13          previously, [REDACTED] might jump in to ask you a few questions as well.

14                 And then, with those ground rules kind of laid out, because this is a deposition,  
15          you'll be under oath. So I'm going to ask you to raise your right hand to be sworn.

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

19          The Witness. I do.

20          The Reporter. Thank you.

21    EXAMINATION

22                  BY [REDACTED]

23          Q        Okay. I'd just like to start with some basic background questions.

24          Can you tell me where you grew up, Mr. Meza?

25          A        I grew up in Miami Beach, Florida.

1           Q    Okay. And where are you living currently?

2           A    Fort Lauderdale, Florida.

3           Q    Okay. Could you give me a quick kind of run-through of your educational  
4         background?

5           A    Not including a high school diploma or -- I mean, how far do you want to --

6           Q    You can skip. We'll assume the high school diploma, and then anything  
7         after that you can tell me about.

8           A    Okay. So I have an associate of arts from Miami-Dade Community College.  
9         I also have a certificate in network administration from, I believe it's called now Florida  
10      Career College. I went to school in Israel for about 2 years, a rabbinical institution, a  
11      rabbinical college. And that's pretty much it.

12          Q    And then have you ever served in the military or any law enforcement?

13          A    Yes.

14          Q    Okay. Can you tell me about that?

15          A    I served about I think a total of, if I remember correctly, 3 years in the U.S.  
16      Army as an infantryman, and I was stationed in Fort Bragg, North Carolina. Yeah.

17          Q    Great. And then what was the time period -- I know you mentioned that  
18      you lived in Israel also. When were you in Israel?

19          A    I lived in Israel two separate times. First, I believe from 2004 to 2005.  
20      And then I officially immigrated there. Jews are eligible for the right of return. We get  
21      free citizenship. So I moved there officially from 2007 to around 2010, when I came  
22      back.

23          Q    And then have you ever held any positions in the Israeli Government or  
24      military?

25          A    No.

1           Q    All right. And then what are you currently doing for a living, for  
2 employment?

3           A    I'm an IT administrator.

4           Q    Okay. And how long have you been doing that?

5           A    Probably around a total of 14 years.

6           Q    Okay. And do you work for a particular institution, or who do you work  
7 for?

8           A    I have my own company. It's called GM Networks.

9           Q    Okay. And are you, like, a freelance or a contractor?

10          A    Yeah. I'm more of a consultant.

11          Q    Okay. Other than your work as an IT administrator, do you have any other  
12 sources of income?

13          A    I teach theology online, basically Judaism, for the last, I don't know, 18 years  
14 or so. So once in a while people send me donations, and I think I have -- I still have  
15 videos monetized on YouTube. So they send me a check once in a while.

16          Q    And any income related to your involvement with the Proud Boys?

17          A    None at all.

18          Q    Okay. And I know we covered any government service in Israel. How  
19 about in the United States, other than your time in the Army?

20          A    No.

21          Q    Okay. And that's State, local, or Federal?

22          A    Correct.

23          Q    All right, great.

24          Then let's discuss just a little bit about how you became involved in the Proud  
25 Boys and how you first heard about them. You can just kind of start generally, and then

1 I can ask you some specific questions after that.

2 A Sure. I saw a documentary on Vice -- well, first, I saw them mentioned in  
3 the news during the George Floyd and the Ferguson riots, and I felt that was something I  
4 wanted to be a part of, but I couldn't find the website or anything. Google doesn't list  
5 such sites.

6 So when I saw the Vice City, the Vice documentary on YouTube, there was a  
7 portion of that documentary where they were posting flyers, and on that flyer -- I paused  
8 the video, I zoomed in, and there was a website on there. So I reached out to them, I  
9 sent them a message, and in about 2 months they got back to me, yeah.

10 Q And what was that website?

11 A ProudBoysUSA.com. That was the official website. It's been down since  
12 February of -- well, of last year. ProudBoysUSA.com, yeah.

13 Q So you mentioned that you had seen a Vice documentary and then you had  
14 seen also Proud Boys in the news around -- at some different events. What was it that  
15 you saw in the documentary or in the news that drew you to the Proud Boys?

16 A Well, I saw the Proud Boys as a reactionary movement. I didn't see them  
17 instigating anything. In places where Conservatives were cornered, leaving rallies, they  
18 were there to come to their defense.

19 I didn't see them in the riots because they didn't -- the Proud Boys never engaged  
20 in such activities in terms of chasing people down who were rioting.

21 But I just -- when reporters would cover Trump rallies or conservative conferences  
22 in North America, Canada and the U.S., they would be people escorting the speakers or  
23 those returning to their cars were Proud Boys. And, yeah, I felt that because of my  
24 military background and my values as an Orthodox Jew, I felt that would suit me well.

25 Q Okay. And you specifically identified seeing conservatives cornered or put

1       in these kind of precarious situations. Then do I take it that you draw a connection  
2       between the Proud Boys and that conservative ideology?

3           A     Sure. Well, they do as well. It's in their tenets, what they believe, and  
4       they are conservative values, yeah.

5           Q     Okay. And then other than just kind of those conservative values in the  
6       abstract, how about ties to a particular political organization or group?

7           A     Political organization?

8           Q     Like the Republican Party or --

9           A     Oh, I don't understand that. I mean, by conservative, I include Republicans  
10      and libertarians. I'm a registered Republican. I've been one since I could vote. And,  
11      yeah. I mean, I'm not affiliated in any formal manner with the Republican Party. I'd  
12      like to be in the future possibly, yeah.

13          Q     I guess what I'm asking is, maybe a simple way to put it is, do you think you  
14      need to be a Republican to be a Proud Boy?

15          A     No -- well, you need to be a conservative. You don't need to be affiliated  
16      with either party. I heard this once, it may have been a myth, but I heard there were  
17      Democrats within the Proud Boys, just because even within the Democratic Party you  
18      have the left and you have liberals.

19          So I think Bill Maher was just interviewed, how he was of the opinion that the  
20      party left him, he didn't leave the party. He's still a liberal. But it seems that to be a  
21      liberal nowadays, like I guess it was to be a liberal in the time of John F. Kennedy, is to  
22      have what are considered conservative values today, like free speech, limited  
23      government.

24          So you could be a Democrat essentially and still be a Proud Boy because we would  
25      have the same enemy in common, and that's the left. It's not liberals.

1           Q     Okay. Has that ideology changed at all since you've joined, or have you  
2     seen any changes in what you think of as the Proud Boy ideology?

3           A     In terms of the tenets, they haven't been rewritten. In any group, you're  
4     going to have the riffraff. I would say the bulk of these men are good men, and they do  
5     their best in trying to vet out troublemakers. But overall, I mean, I'm proud of those  
6     guys.

7           Q     What sorts of things, just since you mentioned being proud of those guys,  
8     meaning other Proud Boys, what sorts of things make you proud of the Proud Boys?

9           A     Well, they are reactionary but from a physical perspective. That means  
10    when conservatives, or anyone, gets cornered, gets, what I think, their rights violated,  
11    we're there to protect.

12          I mean, I think it's similar to the oath I took in the U.S. military, the oath that  
13    police officers take. So we're willing to risk not just our safety and possibly our  
14    livelihood by committing these reactionary acts by protecting others, we're even risking  
15    our lives to a certain extent.

16          I think in December we had a Proud Boy that was stabbed. I was actually maced  
17    in November. So we put ourselves on the line to do what we think is the right thing,  
18    which is, in this case, to protect the innocent.

19          Q     And then who are you protecting those people from?

20          A     From antifa and BLM and every other subgroup that's affiliated with them.  
21    In other words, those who go out, I mean, this is not by accident that they're there.  
22    They deliberately wait till the rally ends and the vast majority of rally-goers leave, and  
23    they would corner people going back to their cars, depending if they have an American  
24    flag or a MAGA hat. But, yeah, in particular it's antifa and BLM.

25          Q     Okay. And just curious, can you describe for me what you see as

1       the -- you've identified both antifa and BLM. So I take it, do you think those are two  
2       distinct organizations?

3           A     I view Black Lives Matter as -- initially, the concept I support. I mean, I  
4       believe Black lives matter. I, myself, am Hispanic and I'm Jewish. I think that the group  
5       has been hijacked by leftists to push their agenda.

6           antifa primarily uses Black Lives Matter to start the violence. They're typically  
7       behind them. Their ideology is a left-wing ideology that seeks, in my opinion, to limit  
8       our rights in many different ways.

9           And I think the only ideology contrary to that is the right, with all its problems. I  
10      think it's a choice between what's worse and what's slightly better, so --

11          Q     Okay. I also wanted to ask a little bit, you've used the term "reactionary" a  
12      couple times, and I think you provided some clarification that you mean in the physical  
13      sense, like, reacting to physical violence.

14          Do you also see the Proud Boys as reactionary sort of in the ideological sense as  
15      opposed -- meaning, opposed to social reform or in favor of kind of maintaining a status  
16      quo?

17          A     As much as I feel that calling yourself a conservative or Republican is a  
18      reactionary stance to what's going on, especially if you came from that background, if you  
19      came from the Democratic Party or from a left-wing background.

20          There's many people who become or identify as conservatives every day because  
21      it's reactionary, reactionary meaning that they see what's going on, they see cities  
22      burning. And the bulk of what you see are people kowtowing to that, giving in to that.  
23      And I mean, courage is something the world lacks nowadays.

24          But, yeah, I mean, it's reactionary because it's causing people to react, in this case  
25      align themselves with Republicans, conservatives, like-minded individuals. That's why

1 it's reactionary.

2 Q Okay. Any other kind of main tenets of the Proud Boy organization or  
3 ideology that you think of immediately when you think of the Proud Boys that we haven't  
4 discussed yet?

5 A Again, there's what appears in their bylaws and their public statements, and  
6 then there are some dummies within the group that hurt the experience for everyone.  
7 It's a very small segment of the group, but I'm sure this occurs with BLM and all the other  
8 guys.

9 I've met some very decent individuals who believe in BLM and who are able to  
10 articulate their views very nicely. And then I've heard other people who are just not  
11 tolerant to hearing the other side.

12 So I believe in dialogue. I think it'll be a great day when conservatives can sit  
13 down with leftists and have a conversation, but it seems that it's typically the  
14 conservative who's trying to have that conversation while, in my opinion, the left is too  
15 busy writing people off, cancelling people, not allowing them to respond.

16 So, overall, I mean, I don't see a contradiction with what most Proud Boys do with  
17 what their tenets and their bylaws state.

18 [REDACTED] Okay. My colleague [REDACTED] has a few questions for you as  
19 well. So I'm going to zoom the camera out so that you can see him as well. There you  
20 go.

21 BY [REDACTED]

22 Q Hi, Mr. Meza. How are you?

23 A Hi. Good. Thank you.

24 Q Thanks so much for sharing your thoughts today. I think it's really  
25 interesting to hear how you view the Proud Boys and the role that they play in society,

1 where they might fit in.

2 And I assume you're familiar with the oath of the Proud Boys. You might've  
3 taken it when you joined the organization.

4 A Sure.

5 Q And it references Western chauvinism. And I'm curious what that term  
6 means to you and how you think it plays into the actions of the Proud Boys.

7 A Well, some people hear the word "chauvinist" and they automatically think  
8 male chauvinism. But Western chauvinism is just what it means. We could look up  
9 what the word "chauvinist" means. It means not to be ashamed, to be proud of the  
10 accomplishments that we, as the West, have contributed to the world. That's  
11 essentially what it means.

12 The whole creed is: I am a Western chauvinist and I refuse to apologize for  
13 creating the Western world -- or the modern world, I believe.

14 Now, that's an oath or a creed uttered not just by White individuals, but we have  
15 Black members of the Proud Boys, Asians, Hispanics, Jewish, who utter the same creed.  
16 That means we're in some way elevating not just the West, but the people who made the  
17 West so successful, especially in civilizing the world. So it's not tied to anything  
18 malicious from my perspective.

19 Q Got it. That's really helpful. I'm curious what you think falls under the  
20 West and maybe how you heard other people talking -- in the Proud Boys talking about  
21 what is the West.

22 A Well, the foundation of the West, I would probably say is Greece and, in  
23 some way, from a Jewish perspective, Jerusalem. I think Greece gave us culture and  
24 Jerusalem ultimately gave us law. Now, I mean, like Greece also gave us law and Rome  
25 as well.

1           But I believe what made the West, including Western Europe -- I mean, it's not  
2       just the Western hemisphere -- is the Bible, that we take our values from that book.  
3       And it's been that book primarily, along with other books as well, that has civilized the  
4       world.

5           And that's something that I believe predominantly came from the West, even  
6       though Jerusalem is not in the West, or at least nowadays it could in some way be, like,  
7       from an ideological perspective. It was the West that took that book and, in my opinion,  
8       again, civilized the world.

9           Q     So what does that term mean, civilizing the world?

10          A     Well, it's -- that statement, as I say it now, in today's day and age, is  
11       reactionary to what I think forces that attempt to silence individuals, to cancel them out,  
12       to grow government, to in some way, from a civilian perspective, in an uncontrollable  
13       level. It's contrary to all that.

14          We believe in freedom, especially in this part of the world, in America. The  
15       whole notion of 1776, the idea of limited government, giving more power to the citizen,  
16       and smaller power, or less power, to bureaucrats. I mean, that's essentially what it  
17       means to me, that we would in some way be poisoning the experiment instituted by our  
18       Founding Fathers of having a Nation that's essentially governed by its citizens, as much as  
19       a representative republic is.

20          But that's what it means to me. I mean, I think to really understand what  
21       Western values entail, we have to see the opposite. We have to look at Cambodia, the  
22       former Soviet Union, North Korea. That's what we're fighting against and that's what  
23       conservatives see the left bringing into our culture. So, by definition, we feel an urge to  
24       in some way push back.

25          Q     Got it. This is all really interesting.

1           So does the U.S. have religious foundations?

2           A     Absolutely.

3           Q     Can you elaborate on that?

4           A     Sure. Many people, by claiming that many of the Founders were Deists in  
5     some way, try to paint them or write them off as atheists. I mean, a Deist is someone  
6     who believes in the Bible, completely in the Bible, with the opinion that they believe that  
7     God created the world, then in some way took a step back.

8           But that doesn't in any way limit what the Bible has brought to the world. I  
9     mean, in particular, the Jewish part. I mean, me as a Jew, I mean, I'm going to promote  
10    the laws in our Bible versus -- I mean, I don't -- I'm not a teacher or believer in the New  
11    Testament.

12          And in contrast to that, we see the trail of blood and carnage that other societies  
13    that have tossed away the authority of the Bible have brought on this planet. The Soviet  
14    Union, one, I think, prime example of a society that did away with biblical values, a  
15    society that tried to reinvent the wheel ethically, I think they just left a trail of blood and  
16    carnage.

17          So I think historically, if I was a betting man, I'd choose a society based off the  
18    Bible than a society that tried to reinvent the wheel. I mean, assuming that that society  
19    had a track record of relative free speech, relative equal rights for all its citizens.

20          I mean, "relative" meaning that we have to judge a society at the time it exists.  
21    We can't always point to some utopian level.

22          So overall, I mean, I think that societies, especially today, that are able to  
23    articulate where their values come from -- in this case, the Bible -- do much better.

24          This is why we're having this discussion nowadays. If I was in some other  
25    country, I'd probably be thrown in jail. I mean, who cares what I have to say? But we

1 believe in dialogue. And we ultimately believe in ideas that work, and I think the Bible is  
2 the root of that.

3 Q Got it. So what are some of those values, those biblical values?

4 A Sure. Not favoring the poor in judgment I think is very important. I  
5 mean, that's almost the basis of left-wing movements, which, in my opinion, they use the  
6 left, I mean, just like -- I'm sorry -- use those they claim to support just so that they can  
7 get what they want politically. Like the Soviet Union never really cared about workers.  
8 I don't think the feminist movement really cares about women. They're just, in my  
9 opinion, there to push a left-wing ideology.

10 I think the Ten Commandments is another great example of words that have  
11 civilized humanity. Now, I think many other societies could come up with the idea that  
12 it's wrong to murder and that one should honor their mother and father. But I think it  
13 carries a lot more weight when God, in this case the God of the Bible, tells you that you  
14 shouldn't murder and tells you that one should honor their parents and one shouldn't  
15 covet and one shouldn't steal.

16 So, of course, the Bible alone is not enough. You need a belief in a God to really  
17 put those words into practice for those words to be effective. Because if it's just a book,  
18 I mean, people could claim to follow Mao's Red Book, but the only reason it never takes  
19 off is because they know in the back of their mind it's really just Mao's word.

20 So a good belief in God and the Bible together, I think, is what has made our  
21 country great.

22 Q Got it. So I was tracking the explanation of the Ten Commandments, but  
23 I'm not sure I understood the first thing that you said. I think you said not favoring the  
24 poor in judgment.

25 A Correct.

1           Q     Okay. Can you explain what that means?

2           A     Well, that's a verse in the Jewish Bible. It says that if somebody comes -- if  
3     you have two people in front of you, and you shouldn't, as a judge, show any form of  
4     favoritism to someone just because of their social status, apart from the case at hand, if,  
5     for some reason, if it's tied to the case as something else.

6                 But just because someone's poor -- or, in this case, because the opposite is also  
7     true, just because someone's rich -- the justice system, in this case the judge, should  
8     remain blind to that. I think that's the whole notion of justice being blind in every statue  
9     in virtually in front of every courthouse.

10              So it's telling us that in front of the law justice is blind and should remain so. So  
11     we have to contrast to what's done nowadays with the idea of social justice.

12              So social justice means that you do take these things into account, that it doesn't  
13     ultimately matter if the perpetrator is guilty or not. They take into account his class, his  
14     color, his or her gender, and use that to help them make a ruling.

15              So I think that's a perfect contrast to what the Bible is telling us not to do.

16            Q     Got it. So tying it back to our earlier discussion of antifa and BLM, and  
17     you've mentioned this a couple of times, what you think they're trying to do, can you  
18     explain that and why you think they're trying to do what they're doing?

19            A     I think there's a lot of misinformation going around, misinformation that's  
20     being spread. And I think -- I mean, that's the basis of evil in this world -- lies.

21              I think college kids, in the case of antifa, because there is a distinction between  
22     antifa and BLM, college kids who are, in my opinion, indoctrinated to believe that there's  
23     systemic racism, that the police actively target individuals for execution, in this case for  
24     murder, when you charge a cop with first degree murder that's a statement you're  
25     making, the idea that we have to defund this, the notion that government should be

1 larger, not smaller, these are ideas that inquisitive college kids run with. And when they  
2 hear someone like Donald Trump or basically the conservative voice on radio, on TV, they  
3 feel they have to fight against.

4 I mean, it's very similar to how Proud Boys feel they have to fight against them.  
5 They feel we're going against their values, right, just like we feel they're going against our  
6 values. But clearly someone is wrong.

7 Q So is it the responsibility of the government to respond to antifa and BLM, or  
8 is it the responsibility of groups like the Proud Boys, in your view?

9 A Well, I think citizens are there to support the government. We have the  
10 concept of a citizen's arrest. There's times, countless times -- oh, as a matter of fact, I  
11 guess it's hard to poll something like this, but if you would ask the average policeman if  
12 they appreciate Proud Boys and their events, I think the vast majority of them would say  
13 yes. We're very respectful to law enforcement, we always thank them for their service,  
14 and we're there to do things that possibly they can't.

15 Nowadays, it's no secret that many police officers are failing to answer calls,  
16 distress calls, depending on what neighborhood they're in, lest they get, you know, lest  
17 something escalates in that encounter and they get painted a racist.

18 So I don't think our efforts are in any way contrary to what a cop would do in that  
19 situation. But, one, there aren't too many cops. Two, I feel their hands are tied  
20 currently because of this notion of social justice versus actual justice. And two -- and  
21 three, there are actually less of them nowadays because of the defunding of or limiting  
22 funds to many of these police departments nationwide.

23 So I don't think they're, the ideas, are in any way -- in any way contradict  
24 themselves, that I could believe in law enforcement doing their job and I support,  
25 absolutely, what every cop and what he risks out there. I mean, I appreciate their effort.

1       But at the same time, I still feel that Americans should do their part when they feel  
2       people's rights being trampled on, when they see buildings burning on TV.

3           I mean, I think it takes a certain type of person -- I mean, it's not common  
4       nowadays, I think it was a lot more common in the days of the Founding Fathers, to say  
5       that, you know what, I'm going to risk possibly going to jail, I'm going to risk possibly  
6       losing my job just to fight evil.

7           Q     Got it. So based on what you said, is it fair to say that you see the Proud  
8       Boys as kind of an extension of law enforcement?

9           A     Well, we don't answer to the government, but we answer to what we think  
10      are fundamental American values. We think that rights are being trampled upon. I  
11      mean, just like any concerned citizen would move in if they saw some man raping or  
12      abusing anyone, or anyone being abused, I think there's actually some laws in certain  
13      States that if you don't act you're held liable.

14           So in that same sense I think that it's a great thing when people get involved to  
15      support what they think is good, yeah. Whether you're on the right or on the left, right,  
16      I mean, you can't stand idly by when you see injustice occur.

17           Q     I think I understand. But help me understand, if you see injustice occurring  
18      based off of your value set, I think many Black Lives Matter folks might say that they were  
19      protesting in the face of injustice that they saw based on their value set. Who is right?  
20      And what's the purpose of taking action in those cases?

21           A     What's the purpose of any war or any conflict? Why did we intervene  
22      during World War II? The Germans thought they were right. The Soviets think  
23      they're -- well, I guess that's a Freudian slip. Putin thinks he's right.

24           So, clearly, you have to pick a side and act, right? I mean, I think that the Proud  
25      Boys and antifa are not moral equivalents at all. I mean, I think that we can articulate

1 where our values come from, and we have a track record of this ideology actually making  
2 the world better.

3 I'm not saying a Proud Boy ideology, but an ideology based off of biblical values.

4 I don't think you have to go too far. I mean, just look at Venezuela, look at Cuba.

5 The left, I think, ultimately hurts more than it helps. At least conservatism tries  
6 to conserve what worked or what has worked for us till now. This is why we feel we're  
7 right. Regardless in any conflict you're in, in any -- anything that you're trying -- any  
8 initiative, there's going to be contrary views and views contrary to that. You have to  
9 pick a side or then, if not, if you don't fight, then the other side will always win. So, from  
10 my opinion, the other side is wrong.

11 Q So you brought up kind of broader war examples. Is that how you see kind  
12 of the conflict between the right and the left, or Proud Boys and antifa, as a kind of war?

13 A It's for sure a war. It's a civil war. So far I would say it's a peaceful civil  
14 war, peaceful in the sense that most instances where the Proud Boys are at don't end  
15 with bloodshed. We're there as a deterrent to those who would think of throwing a  
16 bottle or attacking en masse.

17 So, yeah, absolutely, just that level of support, acknowledging that there's a  
18 contrary view that would love to hurt us, I think classifies us in some peaceful civil  
19 war -- or somewhat civilized civil war. But, yeah, it's still war.

20 Q Got it. Do you feel like there are allies that you have in government?

21 A I would hope so. The truth is, I've, in D.C., I've met a few of them. I don't  
22 know their names, but I would hear that this is a Congressman, this is a Senator, yeah. I  
23 mean, I would say that most conservatives, if not all, support this initiative but are not in  
24 the position to do it publicly.

25 Q Do you think Donald Trump is an ally of the Proud Boys?

1           A    I think Donald Trump is an ally.

2           Q    What are some of the things that he did or said that makes you think that?

3           A    He could've publicly denounced us many times, right? I mean, I think once  
4         he made the statement that he didn't know who the Proud Boys were -- during the  
5         Presidential debate, he makes a statement of stand by and stand down. If we were this  
6         White supremacist, I don't know, Nazi or fascist organization, I don't think he would take  
7         such a public neutral stance.

8           Yeah, we're -- I'm pretty sure that he's aware of what -- of more than what people  
9         give him credit for. I'm sure he watches the news of what occurs at the end of his  
10        rallies, and he sees young men running to the defense of the victims. Why wouldn't he  
11        be proud?

12          Q    Got it. So it wasn't necessarily things that he did or said but it's more that  
13        he didn't condemn the Proud Boys?

14          A    Correct.

15          Q    And I'm sure you saw on the debate stage when President Trump said stand  
16        back and stand by to the Proud Boys?

17          A    Uh-huh.

18          Q    Did that carry a particular meaning for you?

19          A    It really increased membership, just because we got national recognition.  
20         And I think he also said that reactionary, because they were talking about antifa and the  
21        riots.

22          So I think the first person to mention it was President Biden, and I think President  
23        Biden was trying to get former President Trump to denounce the Proud Boys, and that's  
24        when he said to stand down and stand by.

25          Q    Got it. You said it increased membership. Do you have a sense of -- do

1 you have a sense of, like, how many people that would be?

2 A Not exactly, but I know that there were more Proud Boys after that  
3 statement, I guess a few months after that statement, than there was ever before. So it  
4 must've increased it over 50 percent.

5 [REDACTED] Got it. This is all really interesting.

6 I see my colleague, [REDACTED] came on camera, so I just want to make sure that  
7 if he has any questions he has a chance to ask them.

8 [REDACTED] Sure. Thank you, [REDACTED] and thank you, Mr. Meza. I just  
9 have a couple of follow-up questions on those points.

10 BY [REDACTED]

11 Q You've talked a lot about how the Proud Boys are working to help defend  
12 against threats to American society, values you've identified. I'm wondering how you  
13 think American society has moved away from biblical values you've described.

14 A Well, I think abortion is running rampant. Now it seems to be performed  
15 as a form of birth control. I think that's unacceptable, especially when it's -- when the  
16 aborted fetus is not the product of rape.

17 I think children are being taught at a very early age that they should trust the  
18 government over their parents as their -- well, in some way to replace their parents.  
19 Now we have this policy in many States where a girl can get an abortion without parental  
20 consent, could even have surgery to, let's say, have her breasts removed if she feels that  
21 she's a woman, without parental consent.

22 I think that's the makings of a cult, when you try to decentralize authority, which  
23 in this case, regarding children, is really the responsibility of the parents.

24 Now, that's just with children. I think the government is way too large. I think  
25 taxes are way too high. I think that the left, which is predominant today, is not doing

1 anything challenging social media companies from canceling individuals, from limiting our  
2 freedoms, while the right is.

3 I mean, I could see why liberals or left-wingers would be becoming conservatives  
4 en masse -- it's not the other way around -- because they feel our rights our slowly being  
5 taken away. We're not able to say how we feel without massive repercussions,  
6 especially on the political -- in the political world -- or in anything.

7 Q So I saw you mention -- I heard you mention children trusting the  
8 government over their parents. And I believe there was a mention to gender  
9 nonconformity in your answer there. So I'm curious about your thoughts on the role of  
10 sexuality and gender nonconformity in your affiliation with the Proud Boys and how you  
11 think about those values in relation to what you've been talking about.

12 A That's a big question.

13 Now, there are actually homosexuals that are members of the Proud Boys. It  
14 doesn't -- it's not contrary to our principles to allow homosexuals in.

15 In terms of people -- or a man feeling that he's a woman or vice versa, that doesn't  
16 bother me. I mean, I am only bothered when my rights, I feel, are taken away by being  
17 forced to refer to a person who's genetically male as female, with the risk of losing my job  
18 or being labeled a bigot.

19 These gender pronouns, I think that it's outside of the scope of the government's  
20 reach, essentially, to compel or coerce its citizens to keep such laws. These are things  
21 that did not exist 30 years ago, even under Clinton, right? It seems that there is a huge  
22 distinction between the left and liberals.

23 I mean, I admire many liberals. Alan Dershowitz. There are many liberals I  
24 admire. Although currently there are no leftists that I admire.

25 So that's -- I don't -- I don't really understand your question. I mean, I tried to

1 include how Proud Boys view homosexuals. There's nothing in our bylaws regarding  
2 gender or the exclusion of someone who feels he's a woman, or even a man who dresses  
3 like a woman, because you're not really affecting someone else's values.

4 Now, truth be told, the Bible is against that, and it's against many things that occur  
5 in the West nowadays. That's why I say it's predominantly the book that has catapulted  
6 us forward.

7 But there are some ideas that I think for today's day and age, in America  
8 specifically, are a bit antiquated. But it's, like I said in the beginning, it's not all or  
9 nothing. There are some things -- I mean, sometimes the choice is between what's  
10 better and not utopia.

11 Yeah, go ahead.

12 Q Yeah, no, I appreciate that answer. It's really helpful for context. I guess  
13 the reason I asked the question was because you earlier were mentioning a lot of biblical  
14 values and how Proud Boys play into that sort of conception of the country, of the world,  
15 of the West.

16 And so I guess one question I have is how you think that -- you spoke about this a  
17 little bit -- how you think that your rights are being infringed upon by some of these drifts  
18 away from biblical values on sex or gender.

19 A Well, again, that's a loaded question that I would have to think about a lot,  
20 but one is not being able to say what I feel, for example, without getting my Facebook  
21 account shut down, if -- or the idea that we have panels that decide what correct  
22 information is and noncorrect information is instead of just relying on doctors, on this  
23 case regarding, let's say, COVID. You have dissenting and pro opinions on both sides.

24 But the idea that there is a monopoly, that only the left, in this case, could dictate  
25 what's right and what's wrong with how one should raise your child, with how one should

1 treat a spouse, with how one should refer to their colleague, I think that's overstepping  
2 their authority, and that limits my rights as an American. I mean, it's really a fear of  
3 speaking out.

4 I think that the mismanagement of COVID, like of COVID, was predominantly  
5 pushed by the left, although it began when President Trump was in office. I mean, I  
6 support the party. I don't necessarily agree with everything any candidate says.

7 But I think that this is a -- they're encroaching on essentially what could end up as  
8 a left-wing takeover. I mean, yeah, I don't -- I don't know if that's enough examples,  
9 but --

10 Q It is. And I suppose one question that comes to mind in what you've just  
11 been saying is you've mentioned a lot of these conflicts that you've identified, and you've  
12 also mentioned how Proud Boys are not a group that is sort of limited to specific genders  
13 or sexual orientation or gender presentation you mentioned.

14 And so I guess my question from that is, what do you think the role of a gay man  
15 or someone who is transsexual is in the Proud Boys, given that the world you're  
16 advocating for might not comport with some of their lived experiences?

17 A I think it would be the same role that a gay man or a transgendered  
18 individual plays in the Republican Party or in any conservative movement, from -- what's  
19 his name? Paul Rubin, is it? Yeah, Paul Rubin. Matt Drudge. Milo. There are  
20 many individuals who are openly homosexual and hold conservative values. I don't  
21 think it's in any way contradictory because we're -- it's basically, from our opinion, the  
22 Republican Party is the group with better ideas. That's ultimately how we view  
23 ourselves.

24 [REDACTED] Great. I, unfortunately, have to hop out for a few minutes, but I'm  
25 going to pass it back to my colleagues, [REDACTED]. I look forward to

1 continuing our conversation.

2 The Witness. Okay. Thank you. Thank you.

3

4 BY [REDACTED]

5 Q Okay. I'm going to bring the conversation back to some specifics about the  
6 Proud Boys and your chapter.

7 Which chapter of the Proud Boys are you a member of?

8 A I'm a member of the Miami chapter. Well, it's really Miami and Monroe  
9 Counties.

10 Q Am I right, we've spoken to witnesses prior, and was there -- is the Miami  
11 chapter called the Vice City chapter?

12 A So that chapter has nationally ceased to exist. So our chapter replaced that  
13 chapter. However, they still meet, but they're not recognized as Proud Boys on a  
14 national level.

15 Q Okay. Is there also separately a Broward County chapter?

16 A Correct.

17 Q Okay. And so did the Miami chapter and the Broward County chapter grow  
18 out of the Vice City chapter?

19 A No. The Broward chapter was actually put there by Vice City, and then  
20 there was internal fighting that started off when Enrique Tarrio was accused of being a  
21 Fed, a snitch. And then there was a huge split within the Proud Boys. And that is the  
22 side I took, I took the Enrique Tarrio side, which is a very small side.

23 And since then, we've been out of the loop of -- I mean, since he got out of  
24 jail -- now, I mean, he's back in jail -- since he got out of jail, we've established relations  
25 with the Broward chapter and the West Palm Beach chapter.

1           But Vice City has always refused to acknowledge us because we aligned ourselves  
2 with Enrique Tarrio. And they were officially disavowed when they attacked one of their  
3 members for affiliating with us. And that, according to the bylaws, is something that  
4 would get you kicked out as a chapter, as an individual as well.

5           Q     So the Miami chapter is officially a member -- a member chapter of the  
6 Proud Boys?

7           A     Not Vice City.

8           Q     Yeah.

9           A     Our chapter, which replaced that chapter.

10          Q     Understood. Understood. I was drawing the distinction between --

11          A     Okay.

12          Q     -- Vice City chapter and the Miami chapter.

13          Is that the official name of your chapter, the Miami chapter?

14          A     It has a nickname. Every chapter has a nickname for apparel. So just like  
15 Miami -- the first Miami chapter was called Vice City, this one is called Villain City.

16          Q     Okay.

17          A     Now, all this information is online on our website. I believe it's POYB.US.  
18 So anything I'm telling you, I mean, you guys could find online.

19          Q     Sure. Yeah. And we're just interested in kind of hearing it in your words  
20 and from your perspective.

21          A     Sure.

22          Q     You mentioned apparel. Can you just tell me a little bit about what the  
23 chapter does in creating apparel and selling it?

24          A     So currently the chapter doesn't do anything, because it's only really been in  
25 existence since Enrique Tarrio's been out of jail. So that was -- when did he get out?

1       January 15th, I believe.

2           So we've been -- there's been a lot of infighting within the Proud Boys. So being  
3       that the bulk, I would say, of the Proud Boys in some way disowned Enrique and anyone  
4       who supported him, that we were kicked out of all the chats from February of last year  
5       and only started coming in slowly when he got out of jail because he was able to iron out  
6       a few things.

7           So since then we haven't had -- all we have is the website, but we have no T-shirts,  
8       we have no buttons or coins or anything. Not yet at least.

9           Q      When either chapters or individual Proud Boys sell apparel, is that generally  
10       for personal income, or does that, do those profits go to the Proud Boys or a chapter?  
11       Can you explain that?

12           A      So it's typically for personal income, but it's also for the chapter as well.  
13       Most people don't have the ability to print shirts and mugs and baseball hats. So I  
14       remember when I was in national chats before they kicked us out, there were maybe,  
15       like, ten guys nationally who, like, their wives would create a Telegram channel with all  
16       their merchandise, and then they would sell it.

17           I mean, I think this is what Enrique Tarrio did as well. He had his own shop  
18       where he would sell Proud Boy apparel. But it was either/or. It was either to support  
19       their local chapter or to make funds for themselves, yeah.

20           Q      In the cases where it was to support a local chapter, was there some central  
21       collection of funds? Or how do chapters normally handle their finances?

22           A      I don't know. I don't know. When I joined the Proud Boys, there was  
23       really none of that in terms of trying to sell shirts to support the chapter. The only  
24       person I knew that sold shirts was Enrique, on his website, and a few national guys' wives,  
25       they created their own pages to -- I mean, to sell apparel.

1           I was never involved on a leadership level to know what the chapter did for funds.  
2        I mean, I think that we didn't really collect funds. When anyone had to travel to a rally  
3       or something, they paid out of their own pocket. And if they needed to buy a hat or  
4       shirt for that rally, they would buy it out of their own pocket. It was never, like,  
5       subsidized by leadership.

1

2 [11:05 a.m.]

3

BY [REDACTED]

4 Q Did you ever pay dues?

5 A No. No. We never paid dues. I think as a rule, I think Florida chapters  
6 decided not to institute dues, but other people did. There's other chapters that they'd  
7 institute dues, meaning that it wasn't against the bylaws to do that.

8 I think that the fear was in some way being labeled -- I'm not too up with how the  
9 law functions here, but what I heard was the word "RICO" or anything involving money  
10 and the gathering of money that could be deemed illegal, this is why they never collected  
11 dues. Yeah.

12 Q You mentioned the Florida chapters kind of agreeing on a dues policy or  
13 generally disfavoring dues, which brings me to another question. I'm interested in kind  
14 of the hierarchy or the structural organization of the Proud Boys. Is there, like, a Florida  
15 association of Proud Boys chapters?

16 A There is not.

17 Everything takes place on Telegram. So there are different chapters across  
18 Florida. Each chapter has a president. And it seems that whoever chats more has  
19 more influence, at least outside of their borders. So there's guys who are always there  
20 chatting on Telegram and -- but Florida doesn't really work together.

21 I mean, every chapter is essentially completely autonomous. They may meet for  
22 a barbecue or something, but -- I mean, one, there hasn't been anything to do together.  
23 I mean, if you're a Proud Boy in Portland, you deal with things that happen in Portland.  
24 But outside of the events in D.C., there aren't too many times that the Proud Boys got  
25 together and actually met other Proud Boys. I think there was once a rally in Portland

1 that was similar. Yeah.

2 But, again, I haven't been a Proud Boy that long, so -- yeah. That's the most I  
3 know about that.

4 Q Okay. I can ask some more specific questions about that in one second.

5 But, actually, you just mentioned -- so when did you actually join the Proud Boys?  
6 Do you remember the approximate time?

7 A Yeah. I think it was around 1 month before our first trip to D.C. So that  
8 would've been maybe in September or October.

9 Q Okay. September or October of 2020?

10 A Yeah.

11 Q And are you familiar with -- am I right that, at some point -- maybe no  
12 longer -- that there was an elders Chapter of the Proud Boys?

13 A I've heard of such a thing, not a -- well, I don't know about a chapter. I  
14 know the term "elders," which are guys from across the Nation who would vote on things.  
15 I'm not sure there was an official chapter. I don't know how that functions. But, yeah,  
16 I'm familiar with the concept.

17 Q Okay. Is that the closest thing to, like, a national leadership of Proud Boys  
18 that there is or was?

19 A I think so.

20 Q Okay. And do you know if that -- it sounds like that doesn't still exist?

21 A So that doesn't exist anymore.

22 Q Okay. Is there any sort of replacement leadership structure at the national  
23 level?

24 A No. From the national level, they decided that every chapter, every State  
25 was going to have full autonomy, so they supposedly dismantled any semblance of elders.

1           Q     Okay. And does that also apply to the role of chairman? Was there --

2           A     Right. Correct.

3                 Now, there's a difference between chairman and spokesman. So Enrique Tarrio  
4     stepped down as chairman. However, he remained unofficially somewhat a spokesman  
5     for the Proud Boys, just because he was the one that people were used to reaching out to  
6     for any official statements.

7                 But I don't think there was a role of -- official role of spokesman. But there was a  
8     role of chairman, which -- he was the chairman, yeah.

9           Q     And have you ever held any leadership roles in your chapter or any  
10   organization of the Proud Boys?

11          A     Our chapter currently is very small. I'm talking about maybe around eight  
12   guys. So because we didn't -- we were in some way just staying together, waiting for  
13   Enrique to get out of jail, that we all sort of called the shots, because there was no -- I  
14   mean, nothing really going on.

15          So, official? There were no official positions in our chapter, but I was the one  
16   who arranged the meetings, and, I mean, I think I was probably the more responsible one  
17   in the club, so I did a lot of the organizing.

18          But we haven't -- like, our chapter currently still doesn't even have bylaws,  
19   because it's so new. And now the future of it is unknown because Enrique is back in jail.  
20   So, yeah, currently, holding an official position? None.

21          Q     Okay. Would it be -- is or was Enrique the president of your chapter?

22          A     Yes and no. He doesn't like to use that word, "president," just because a  
23   president could be voted out. So the way he wanted to run our chapter was that  
24   he -- the same way he ran Florida before January 6th, before the December rally, which  
25   was, I mean, he was sort of in charge, and then he let people under him decide any

1       structure they wanted, but he ultimately gave the okay for stuff.

2           So I think he was shying away from that role of president just because of what  
3       happened before with Vice City, that they were in some way able to vote him out, just by  
4       vote, because he had a position there. Yeah.

5           Q     Okay. So, pre-January 6th then, you're saying that Mr. Tarrio was sort of  
6       the de facto leader of the Florida Proud Boys?

7           A     I think -- well, he was the national chairman. But in terms of statewide  
8       leadership, absolutely. At least south Florida, so you're talking about from West Palm  
9       down, yeah.

10          Q     Okay.

11           Can we talk a little bit about your relationship with Mr. Tarrio? How close are  
12       you?

13          A     Not that close. I would consider him a friend of mine, but not a friend that  
14       I talk to on the phone or I, you know, go to his house or hang out with him.

15           I'm able to do graphics, I'm able to do a lot to promote any kind of initiative, and  
16       I've always offered myself to help in any way I could. He knows that I was basically in  
17       every rally and I was proactive. But I think that's the extent of our relationship.

18          Q     And then I just wanted to ask you about a couple other, sort of, Proud Boys  
19       in your area. Do you know Christopher Barcenas?

20          A     Yes, I know him.

21          Q     Okay. Is he in your chapter?

22          A     No.

23          Q     Okay.

24          A     He was part of the Vice Chapter that was dissolved.

25          Q     Okay. And is that still, as far as you know, his status, part of the --

1           A    I don't know, because that chapter hates our guts. You know, so since the  
2 split in February, I haven't seen any of them.

3           Q    Okay.

4           And then how about, do you know Gilbert Fonticoba?

5           A    Yes, I do.

6           Q    Is he also Vice Chapter?

7           A    Correct.

8           Q    Okay.

9           Not a Proud Boy obviously, but I wanted to ask you, do you know Bianca Gracia?

10          A    Yes, I do.

11          Q    Okay. How do you know Bianca?

12          A    I went to D.C. to perform security the three times I went, and she was one of  
13 the individuals that we were performing security for -- her and some other organizations  
14 and, actually, a few Congressmen. I just can't remember their names. So that's how I  
15 know her.

16          Q    Okay. We'll get into a few more, kind of, questions and details on that in a  
17 second, but that's good to know.

18          And then I wanted to ask you about -- I know you sent me a message that a  
19 reporter had provided you that you had sent out and then kind of got forwarded and  
20 discussed in other Proud Boys groups. And one of those groups was called the Proud  
21 Goys. Can you just describe, one, what that group is and how it relates to the Proud  
22 Boys?

23          A    So Proud Goys are not Proud Boys. That was created by someone  
24 named -- the last name is Chapman. I believe he's Canadian. I think he used to be a  
25 Proud Boy who had racist -- like, some sort of racist ideology, so he was kicked out of the

1      Proud Boys, and he created Proud Goys.

2                Anyone who knows Hebrew knows that "goy" is a derogatory term for gentile,  
3                right? I mean, "Goyim" is gentiles plural. So Proud Goys was in some way amplifying  
4                the fact that they're anti-Semites but in some way are former Proud Boys. But they are  
5                not affiliated at all.

6                And I saw that the reporter who sent me that post, that someone within the  
7                Proud Boys, all right, shared that into the Proud Goy chat, I guess their public page or  
8                whatever. So I guess they found it funny because they saw me calling out some Proud  
9                Boys for making racist statements on Telegram.

10              Q     Okay.

11              Are there any other kind of well-known associated offshoots of the Proud Boys  
12              that you can think of?

13              A     Yeah. I wouldn't call Proud Goys an offshoot. I mean -- yeah, well, it  
14              came -- because -- I think because the media portrays not just Proud Boys but anyone on  
15              the right as a White supremacist and essentially racist, it begins to draw a lot of those  
16              people in. And I don't think these people are particularly honorable people, so they  
17              would have no problem taking an oath or lying about their true intentions. And this is  
18              why we have this sort of -- a few of these guys who, when flushed out, break off and say,  
19              "Yeah, well, I used to be a Proud Boy, you know, but now we've started, like, this new  
20              organization," or whatever.

21              So, in terms of any other offshoot, I don't think so. I mean, if they were, they  
22              wouldn't publicize it. Yeah, officially, I think, in terms of the bylaws, one's not able to be  
23              a Proud Boy and part of any other organization, similar-type organization. But, no, I  
24              don't know any.

25              Q     Okay.

1            You mentioned, sort of, the media portraying Proud Boys as White supremacists  
2 or being associated with White supremacy.

3            A     Uh-huh.

4            Q     Can you expand on that a little bit?   What do you think -- well, I guess I'll  
5 ask a more direct question.   Are there White supremacists in the Proud Boys?

6            A     Sure.

7            Q     Okay.   And --

8            A     Sure.

9            Q     -- then, how do you think the Proud Boys deal with that?

10          A     Well, there's White supremacists, I believe, who identify as leftists as well.  
11          I mean, it's not a Proud Boy phenomenon.   You're always going to get some individuals  
12          in any movement.   I would say the bulk of the Proud Boys, 99 percent of them, are not  
13          White supremacists.

14          Now, you're asking someone from Miami.   I live in a very diverse community.  
15          The vast majority of members of any of these south Florida chapters are predominantly  
16          Hispanic.   So I firsthand don't know any White supremacists.

17          However, there are national chats within these Telegram groups that I used to be  
18          a part of before this huge split that -- a lot of these guys would post very, very disgusting  
19          comments.   And when I responded and I told them, you know, that you're  
20          misrepresenting not just the Proud Boys but the reason we joined this organization, I saw  
21          a lot of the leadership not doing enough to stop it.

22          So that's when they kicked me out of these groups, initially.   I mean, first, in  
23          December, they started kicking me out of these groups, and in February there was a split,  
24          which is another thing.

25          Yeah.   That's the answer.

1 BY [REDACTED]

2 Q I'm curious to know, if you felt like leadership wasn't doing enough to stop  
3 racist language or anti-Semitic language, why did you want to stay in the Proud Boys?

4 A Because I saw similar attitudes when I was in the military. Now, overall, I  
5 support the initiative or the efforts of the U.S. military, and I'm not going to in some way  
6 discount it just because of a couple dummies. I mean, I think in every area of life you're  
7 always going to have the bad element, but if the bulk is good, that's a direction we should  
8 go.

9 So, I mean, yeah, I think there's the evil movement and the stupid movement, and  
10 I belong to the stupid movement. And I've seen this in every area of life. You have to  
11 take the good with the bad and align yourself with what ultimately does more good,  
12 if -- do you understand what I'm saying?

13 Q Yeah.

14 And just to clarify, when you're talking about the evil movement versus the stupid  
15 movement, you're talking about within the Proud Boys, not just --

16 A No, no, no. I'm talking about the left versus Republicans.

17 Q Got it. So are White supremacist Proud Boys evil or stupid?

18 A Oh, they're evil. They're evil. But the leadership not doing enough  
19 to -- with not upholding the bylaws, that's stupid.

20 Q Got it.

21 [REDACTED]

22 [REDACTED] Thank you, [REDACTED] And I'm glad to be back in the  
23 conversation.

24 [REDACTED]

25 Q One followup point I was curious about asking was sort of how you took

1 some of these White supremacist comments as a Jewish person and why you felt that it  
2 was important for you to remain in the Proud Boys, given the tension there or if you  
3 perceived a tension there.

4 A Uh-huh. I did perceive a tension. This was a national chat, not a local  
5 chat. If my local chat was predominantly White supremacists, I would not remain in it or  
6 I may affiliate with some other chapter. If the Proud Boys were predominantly White  
7 supremacists, I would not affiliate with the Proud Boys.

8 Yeah. That's pretty much it. But by the fact that they're not mostly White -- I  
9 mean, the vast majority of them are not of that ideology -- is why I remain a Proud Boy.  
10 Yeah.

11 Q More broadly -- I must admit I am Jewish, so I'm curious about this  
12 point -- how did you view the role of Jews in the Proud Boys, both in your local chapter  
13 and the national chapter?

14 A There aren't too many. In D.C., I met a few just because I was trying to  
15 make a statement while I was there as a Proud Boy. I was wearing an Israeli flag. So  
16 that -- it made me stand out. Of course, I didn't hear any negative comment from the  
17 thousands of Proud Boys I ran into, you know, but the Jewish ones did reach out to me.  
18 And, yeah, it was positive, not just with Proud Boys, with people in the audience, like, in  
19 the crowd. I mean, they were happy to see that those that were there to protect them  
20 actually supported the state of Israel and supported Jews. Yeah.

21 Q So were there ever any conversations where you or other Proud Boys  
22 discussed some of these tensions between members who were Jewish or Latino and  
23 members who expressed White supremacist views?

24 A I had a podcast -- I mean, I still have a podcast now, and on that podcast I  
25 had a debate with a Canadian Proud Boy who was a White supremacist. I mean, I can

1 find you guys the link somewhere. And it was about maybe, like, an hour discussion.

2 Now, this was someone that I found -- or that found me when they saw me make  
3 that statement, which I guess was shared on many different Telegram chats. I mean, I  
4 got many White supremacists attacking me personally but privately messaging me on  
5 Telegram.

6 So then I always welcome them all to have a dialogue with me on my show. Let's  
7 discuss why you feel the way you do. And there was one who took me up on the offer.  
8 And I had a dialogue with him for an hour, kind of breaking down why he felt that Jews  
9 are inferior, or Blacks, or Hispanics.

10 So that's the only time I had a discussion. I mean, most of these guys, whether  
11 they're hardcore Marxists or White supremacists, typically don't like to dialogue. They  
12 just like to write people off. So, I mean, I try to take the middle path. Yeah.

13 Q So what was that conversation like?

14 A Well, I mean, first, I tried to identify what drove him to be a Proud Boy,  
15 right? Because I think he was -- he mentioned something about that, when we try to  
16 make the world a better place -- well, no, first, I started off saying that the reason I joined  
17 the Proud Boys, the reason I'm a veteran, is because I genuinely want to try to make the  
18 world a better place. I want to try to leave it a little better than I found it. And then he  
19 said, "Well, that's the problem there." And then I think he tied Jews into this, that "you  
20 try to make it a better place, but you make it worse," and this and that.

21 So then I tried to determine if he was religious or not, so I was asking him  
22 questions. Supposedly he was, I mean, a believer. He was a Christian from Canada.  
23 And then I told him, well, Jesus taught similar ideas in the Beatitudes, you know, I mean,  
24 the notion of actively trying to do good.

25 So I was trying to help him find the contradiction in what he claims to believe in

1 and what he was telling me as a racist, you know, that basically -- not that -- clearly, it's  
2 no secret that there's a large Jewish involvement in the left and left-wing causes. I don't  
3 think mentioning that, in itself, is racist in any way. What I do consider racist is when  
4 they claim that Jews cannot change. That's what I consider racist.

5 And that's a sentiment that could be held on the other side as well. I mean,  
6 there are many Jews in conservatism. That if some leftist would feel that, oh, Jews are  
7 only involved in capitalism, or only this and only that, I think that's the root of true racism,  
8 when you believe that these individuals cannot change because they're genetically coded  
9 to behave in such a manner.

10 So that's really the dialogue I was trying to have with the guy, but I think it was a  
11 little too advanced for him.

12 BY [REDACTED]

13 Q So you mentioned -- you were saying the core of this problem with racism  
14 and anti-Semitism is thinking that Jews cannot change. What's the direction of the  
15 change? I wasn't totally clear on that.

16 A No, not just anti-Semitism, I think any form of racism.

17 Q Uh-huh.

18 A There is something calls collective responsibility. My family is from  
19 Colombia, let's say. And Colombians are always linked to narcos, to Pablo Escobar, and  
20 this and that. If someone says, well, all Colombians are this and they're always going to  
21 be this, that's true bigotry.

22 While acknowledging that, you know what, yes, there is collective responsibility,  
23 that I think it behooves that individual, in this case of a Colombian, to strive to make his  
24 name and his people look a little better, right, that exists.

25 But assuming that someone doesn't have that ability because they're in some way

1 hard-coded to behave a certain way, that's where the true bigotry lies, that's where the  
2 true racism lies, whether it's with Jews or, like, making fun of Jews, making fun of Blacks  
3 or Asians, saying that, no, it's your genetics that cause you to behave in this way or it's the  
4 color of your skin that causes you to behave in a certain way. Just, no.

5 This is another argument proposed by the left, that all White individuals have  
6 microaggressions towards -- you know, that every White person is racist, whether they  
7 acknowledge it or not, right? That I view as the new bigotry, right? I mean, it's usually  
8 uttered in a very sophisticated manner, so most people don't have any rebuttals. But I  
9 think that's just as harmful as saying that, you know, every Asian has to do X, every Black  
10 person has to do X, just because they're Black or they're Asian.

11 So that's what I was getting at.

12 Q So this idea of collective responsibility, I very much understand what you're  
13 talking about, and I wonder what your thoughts are about singling out the participation of  
14 racial or ethnic groups from the left. You mentioned that folks talk about Jews being  
15 involved in the left and then, sort of, the evils you've ascribed to that political movement,  
16 and whether that's -- so that could be Jewish Americans, Black Americans.

17 A Uh-huh.

18 Q What are your thoughts on that kind of rhetoric?

19 A Can you repeat that one more time? I'm sorry.

20 Q Sure. So you were just talking about collective responsibility --

21 A Uh-huh.

22 Q -- as a frame of thinking to avoid. And so I wonder how you respond to --

23 A No, no, no, no. I'm sorry. I'm pro- people feeling this sense of collective  
24 responsibility. I mean, I -- yeah.

25 Q So, I guess, can you fill in the gap there? Because I thought you were kind

1 of discussing a way in which ethnic or racial groups should not be, sort of, collectively  
2 ascribed responsibility for the actions of --

3 A Oh, no.

4 Q -- individuals of a particular ideology.

5 A Okay. Collective responsibility is what gets that group to change.  
6 However, the idea that the group cannot change is the bigoted idea.

7 Whatever that group happens to be doing or, like, whatever stereotype, or  
8 negative stereotype in this sense, is ascribed to your group, I mean, I think shame is  
9 ultimately a virtue. If your group is doing something that is affecting anyone in that  
10 group, whether they believe or they act in that way or not, it behooves the people in that  
11 group to police themselves and say, "You know what? We're going to stop this behavior  
12 because it's getting us mislabeled."

13 But that only occurs with collective responsibility, people taking it upon  
14 themselves, saying, "Okay, it's true." Hispanics is the ethnicity -- the second-largest  
15 group represented in U.S. prisons. Okay. I mean, me, as a Hispanic, I feel that I have a  
16 greater responsibility than someone not in my group to in some way instill a change in  
17 the community. Yeah. That's what I meant.

18 Q So do you think it's appropriate, then, to call out Jewish involvement on the  
19 left, as you were mentioning Proud Boys talking about?

20 A No, no, no. Well, there's -- everything in life is a matter of degree. Okay.  
21 If someone is trying to insult you and ridicule you, it means that they don't believe that  
22 you have any redemptive qualities in your character or as a people. And this is what  
23 leads to genocides. This is what, essentially, leads to a holocaust.

24 Having a dialogue and just calling out the numbers -- let's say 80 percent of Jews  
25 vote on the left. It's no secret. I would say 95 percent of Orthodox Jews vote on the

1 right, but we're a really small segment of the Jewish community. It's no secret that, if it  
2 wasn't for -- well, I don't know if it wasn't for -- but it shows that the Jewish community is  
3 in some way responsible for whoever we elect or we don't elect because of their voting  
4 bloc.

5                 Same thing with Blacks. I would say it's over 90 percent of the African-American  
6 community that votes for the left. Now, that comes with a certain type of responsibility,  
7 just like most veterans vote on the right and most policemen vote on the right. So I  
8 think a dialogue could be had, not that they necessarily have to change, but why do they  
9 vote a certain way? And perhaps they're acting on false information, right?

10               So I'm all for the dialogue. Writing people off -- and that's what people do when  
11 they just put a meme up or put a distasteful comment on your page. They are writing  
12 you off, and I think that's the source of bigotry. That means they don't care what you  
13 think, they don't care why you do what you do, but they just think that genetically you're  
14 disposed to behaving a certain way, and perhaps you can't, you know, articulate why you  
15 do what you do, and it's not worth for them to have that conversation. That's the core  
16 of bigotry, that attitude towards people you dislike.

17               Q Got it.

18               I guess one final question I have is: Have you ever heard in your conversations  
19 with the Proud Boys or elsewhere about the Great Replacement theory?

20               A Not really -- I mean, is it called something else?

21               Q So it's the idea that folks on the left are replacing American voters with  
22 immigrants and --

23               A I've heard of the concept.

24               Q Yeah.

25               A I've heard of the concept. This is why people on the left typically have a

1 more open-border policy than people on the right, not that we're closing the borders, but  
2 we're following the same laws that were in place when President Clinton was in office or  
3 President Carter.

4 But it seems that -- well, not just -- obviously, not just letting undocumented  
5 individuals into the country. I don't think that's going to change the voting numbers.  
6 But trying to put them on a quick path for citizenship possibly, not checking for  
7 identification when someone votes, right, allowing people to possibly vote twice, these  
8 are actions that the right traditionally does not partake in, right? It's typically the other  
9 side.

10 So, yeah, I mean, I'm familiar with it.

11 Q I mention that because a lot of thinking around the Great Replacement  
12 theory, that general concept, sort of revolves around conspiracy theories about the left,  
13 and the Jewish left in particular, attempting to cycle out voters -- or cycle in voters,  
14 rather. So I was wondering if you had ever heard anything about that.

15 A I've never seen it linked to anything Jewish, but I'm familiar with the  
16 concept. In terms of it being Jewish -- I mean, you have to understand, I mean, Jews  
17 make up a very small segment of the U.S. population, although, I mean, they're  
18 disproportionately represented in the Congress and in the Senate. I don't think they  
19 would attribute that to just Jews.

20 You know, a racist has many irrational ideas, right? I mean, they  
21 typically -- when you don't have to dialogue, it means you don't have to take in  
22 account -- or that you don't have to take responsibility for the statements you make.  
23 You know, so that may have been a -- and I've heard of the idea, but not involving Jews, I  
24 mean, in particular. Yeah.

25 Q All right. That's very enlightening.

1           This has all been really interesting, but I think we're going to -- I'll turn it back to  
2           ██████████ for now, but looking forward to talking more soon.

3           A     All right. Cool, man.

4           ██████████ Yeah. We've been going for about an hour and a half now, so why  
5           don't we take about a 5-minute break or maybe a bit more? It's 11:37, so let's go into  
6           recess, and we'll come back at 11:45.

7           [Recess.]

8           ██████████ We're back on the record at 11:47.

9           BY █████

10          Q     So, earlier in our conversation, you mentioned briefly vetting members, and I  
11          was just curious about that process. Can you tell me what you do to vet members?

12          A     I've never been on an official vetting team or anything like that, but I can tell  
13          you how I was vetted.

14          They put you in a chatroom, and they get a few guys to ask you questions, say  
15          things about yourself, you know, and then they challenge that. Or if there's something  
16          they don't like, they won't let you go any further.

17          Q     And what sorts of things would be challenged? Like, what would be  
18          problematic things?

19          A     Affiliations with other groups, criminal organizations. For example, they've  
20          kicked a few guys out for, like, being affiliated with Latin Kings or, like, other organizations  
21          that don't hold their values currently. I mean, I'm pretty sure there's some leniency,  
22          like, if someone said, I used to be this, you know, I've changed. Not everyone who is a  
23          Proud Boy, or at least felt like a Proud Boy, was a conservative. So I'm pretty sure they  
24          take that into account.

25          And, yeah, if it violated the tenets of the club -- it's a conservative organization for

1       only males. And it's essentially a drinking club, right? It's sort of like a fraternity,  
2       brotherhood, drinking club first, and then some sort of political effort, like, in the sense of  
3       protecting others, second. Yeah.

4           Q     How about, what sort of characteristics are you actively looking for?

5           A     I guess it depends who's doing the vetting. If I was doing the vetting, I'd  
6       ask them certain questions, like, "How do you feel about critical race theory?" or to in  
7       some way tell me where -- I mean, one, what their values are and where they come from.  
8       "Why do you love America? What don't you like about America?"

9           And, yeah, every candidate is different. You know, we gauge them differently  
10      with different questions, I mean, to see how they respond. Depending on how they  
11      respond to the first question, that will really gear how the second question is going to go.  
12      So, yeah.

13           Q     And, then, how about prior military service? Is that something that you  
14      look for or is a good characteristic?

15           A     I don't know if that's something they look for. I told them that I was prior  
16      military, but the Proud Boys are adamant that they're not a militia. So I don't -- I would  
17      say the vast majority are not prior military and, you know, that we don't carry guns or  
18      anything like that.

19           I mean, if someone wanted to engage in something like that, we'd tell them  
20      there's other organizations out there that consider themselves somewhat a militia;  
21      perhaps you want to join them. But they couldn't join us, if that's what they're looking  
22      for.

23           But I think that would be a good sign, if someone was either previously law  
24      enforcement, maybe in the fire department, or military, just because they're good -- they  
25      work well with others and -- yeah.

1           Q     I guess I just want to press on a little bit the idea that the Proud Boys is just a  
2     drinking club. A couple points. One, or first question is, you know --

3           A     Not just -- they're first and foremost --

4           Q     Okay.

5           A     -- a drinking club. Yeah. But there's the other side as well.

6           Q     What else would you say, other than -- there's the drinking-club aspect of  
7     the Proud Boys. What are the other aspects that you see?

8           A     The rallies. The club has always been split into two, between the drinking  
9     guys and the rally guys, right? I mean, not everyone is expected to possibly meet up in a  
10    pub and have a beer with the guys, right? Some people are more rally guys, and there's  
11    other people who are solely drinking, you know, that they don't go to any of the rallies,  
12    but they're there, you know, they'll go to the meetings in the pub.

13          And each member is going to fall in either of the two. So I've always identified  
14    myself as a rally guy. Like, I don't drink. When I go to the bar, I'll get a ginger ale and I  
15    just talk with the guys. I mean, for example, Enrique Tarrio doesn't drink either, but he  
16    was the chairman.

17          But, yeah, it's just like a brotherhood, like a fraternity, with a political side. I  
18    think the way they've described it, I heard it once, it's a political club -- no, no. It's a  
19    drinking club with a patriot problem. Yeah.

20          Q     I've heard that phrase before.

21          So I know you joined, obviously, in, you know, mid- to late 2020, kind of a time of  
22    some intense political activity. But is it your sense that the Proud Boys has become  
23    more political or more involved --

24          A     Absolutely.

25          Q     -- in elections?

1           A     For sure. It was a different club before -- well, I mean, for sure before the  
2     riots. But, I mean, you had riots all the way from the beginning.

3           But, initially, I think -- I think the club was founded in 2016, and back then it was  
4     just essentially a drinking club, but -- I mean, I have met members that have been there  
5     from the beginning, and they don't resemble the newer guys. They for sure don't  
6     resemble me.

7           Yeah. I mean, just because there's been more opportunity, I mean, there's just  
8     been more going on, and our membership grew very large, so there's just been more to  
9     do. Yeah.

10          Q     Can you explain or just expand a little bit on that evolution that you've  
11     identified?

12          A     Antifa. I think with the growth of antifa and rioting, that caused others on  
13     our side, all right, meaning the conservative Republican side, to try to get involved as  
14     much as possible to counter that.

15           That's why I said from the beginning that we're essentially a reactionary  
16     movement. And I didn't mean just Proud Boys; I meant the right getting involved in any  
17     way possible.

18           I would say, most rallies, the people there fighting alongside us are not Proud  
19     Boys. They're just, you know, like other rally members who felt emboldened when they  
20     saw people fighting on their behalf, and they wanted to fight alongside them, you know,  
21     but not formally join.

22           So, yeah, I would say the left becoming emboldened caused the right to, as well, in  
23     a reactionary fashion, confront that.

24          Q     Are there any other, kind of, trends or events around that timeframe, 2016  
25     to 2020, that you think contributed to, sort of, the Proud Boys becoming more political

1 and involved in the elections and the rallies?

2 A I think it was solely the riots. There was really nothing else.

3 Now, mind you, before the Proud Boys, there were Minutemen, or something like  
4 that, or the guys who would sit at the border. And I met a few Proud Boys that came  
5 from that movement. What was it called? The Tea Party.

6 But I'm not sure what the Proud Boys were doing till I saw them on CNN and I saw  
7 that documentary on Vice, I mean, just because I didn't hear about them before then.

8 Yeah.

9 [REDACTED] Did you see the Proud Boys -- and this might've been before the  
10 time that you joined the organization. But earlier in 2020, were the Proud Boys involved  
11 in protesting against COVID lockdown measures?

12 The Witness. That was after January 6th. After January 6th, I, myself, attended  
13 a protest in front of the school board that -- now, it's a little different here in Florida just  
14 because the right feels emboldened because we have a conservative Governor. But we  
15 were protesting children being forced to wear masks in school.

16 But I don't -- look, before the election, they were so busy with antifa and the riots  
17 and George Floyd that I don't remember anything being mentioned about masks. I  
18 mean, not to mention that people didn't know enough about it in the beginning to pick a  
19 side. Yeah.

20 [REDACTED] Got it.

21 BY [REDACTED]

22 Q How about -- just in continuing to identify different movements or issues  
23 that might have motivated the Proud Boys, how about concerns about election integrity?

24 A Oh, that, that was the whole reason for January 6th and December and  
25 November.

1           Q     Okay. Can you just expand on that a little bit? When did you become  
2 concerned about election integrity issues?

3           A     The idea was put out there that they would possibly cheat just because the  
4 left has had a track record, from, you know, Venezuela to anything tied with China, where  
5 they manipulate the voting devices.

6           But I guess, when he lost -- when he lost, I think we all, "we" meaning Proud Boys  
7 and I would say most conservatives, felt that cheating occurred. The bigger question  
8 was if the cheating got Joe Biden elected. All right? I mean, I think reasonable people  
9 could disagree on that. I think it's pretty obvious that some tampering occurred, but to  
10 say that that is -- that cost him the Presidency or not? That's a debate. Yeah.

11          Q     What's the tampering that you identified or that you're talking about?

12          A     Well, mainly the irregularities with the bell states on how -- anyone who's  
13 ever won a certain State, like, since, I think, for the last 50 years, they were almost  
14 guaranteed to win the other States. I mean, I don't have the whole list now.

15          Also, things caught on camera. I mean, I believe in Atlanta they showed  
16 someone, after they kicked all the -- those who monitor elections out, they pull ballots  
17 from under a table and they process those.

18          There were many examples. There was definitely evidence. Was there hard,  
19 hard proof? Well, there's a distinction between evidence and proof. This is why, I  
20 mean, I feel that reasonable people could disagree if that actually cost him the election.

21          In terms of actual tampering, I mean, I don't think that could be denied. Yeah.

22          Q     Were you following any of the challenges in court related to some of these  
23 concerns?

24          A     I was. Now, these weren't really documented in terms of -- I mean, there  
25 was no camera in there. But they were typically written off from the beginning. I

1 mean, the Supreme Court refused -- sorry. Let me drink something.

2 The Supreme Court refused to hear the case. I mean, I think that was the basis  
3 of one of the rallies. I think that was November, why we went there in the first place.  
4 We were outside the Supreme Court.

5 But, from my knowledge, they were just written off, like, from the outset, and  
6 they didn't feel that all these occurrences or these weird coincidences caused President  
7 Trump to lose.

8 I don't think there was any case where tampering was disproved. The argument  
9 was, was it enough to issue a recount or to declare President Trump as the next  
10 President? So, yeah, that's what I think.

11 Q Did you participate in any sort of poll-watching activity or anything, like, on  
12 election day related to the actual casting of votes?

13 A No.

14 Q Okay. How about other Proud Boys? Do you know of any sort of that  
15 activity?

16 A I don't think they knew that this was going to happen. It was possibly  
17 rumored. I mean, I think Donald Trump may have said a few things of them possibly  
18 wanting to cheat or being able to cheat. But no one knew -- well, first of all, everyone  
19 felt that Trump was going to win, okay? And being that he won Florida, especially -- you  
20 know, south Florida is almost predominantly red because of Cubans. It wasn't an issue,  
21 at least with our chapter, and that's the only one I could speak for. Yeah.

22 Q Okay. I think [REDACTED] has some questions for you on this point.

23 [REDACTED] Thanks, [REDACTED]

24 BY [REDACTED]

25 Q Mr. Meza, I'm going to drill down a little more on your belief in potential

1 election fraud.

2 My first question is: You mentioned some irregularities. Could you describe  
3 more where you believed those irregularities were taking place?

4 A I mean, I can't really respond to that. I mean, we're so detached from that,  
5 in terms of, I mean, it's over a year ago. I don't remember all of the arguments exactly.

6 But for sure it's the irregularities with people winning certain counties and not  
7 winning others when historically that would've been the case. Supposedly truckloads of  
8 ballots; people voting twice, three times.

9 The last instance I heard these irregularities mentioned was in New Mexico or  
10 Arizona, where they just had the recount. They came out, the Cyber Ninjas or whoever  
11 were running that recount, that there were irregularities, but they just -- they concluded  
12 that President Biden won the State.

13 So I don't think the argument is -- I don't think anyone makes the  
14 argument -- perhaps the left does -- that there were no irregularities. Right? I think  
15 even Mitch McConnell -- who's not someone I support, although he's a Republican. He  
16 says that this was the most transparent election in history. This is why I think  
17 reasonable people could disagree, although it's -- I mean, reasonable people could  
18 disagree that this cost Trump the election. I don't think it's honest to say that no  
19 tampering was discovered.

20 But that's just my opinion. I mean, this is something -- I'm not an expert in this.

21 Q Sure.

22 I guess what I meant to ask is that President Trump's claims of fraud were focused  
23 on a lot of specific cities. So he talked a lot about Detroit, Atlanta, Philadelphia,  
24 Milwaukee.

25 Were you particularly concerned about fraud in those areas, those cities?

1           A     Concerned how? I mean, I'm concerned that he lost the election. Overall,  
2 if -- I was concerned with winning. So I was concerned that possibly Arizona or New  
3 Mexico was actually won by Trump. And he only needed, I think, around three States -- I  
4 think he was short three or two States. And that's what I was concerned for. I mean,  
5 yeah. That's essentially --

6           Q     Did you think that particular areas, urban versus rural, different areas of the  
7 country, were more susceptible to fraud?

8           A     Yeah, absolutely. Most areas -- well, it's no secret that most large cities are  
9 governed by Democrats. And in places like that -- I think if we think back about all the  
10 times that the poll watchers were denied entry here and there, they were typically in  
11 either cities that were controlled by Democrats or States that have Democratic  
12 Governors. Yeah.

13           I mean, there's clearly a trend, left and right, depending who's governing that  
14 State. Like, most States that are governed by the left typically are those that are  
15 defunding police or those where rioters feel that they could get away with a lot of crimes.  
16 I mean, look at Portland. Look at Chicago. Yeah.

17           But you guys are in Washington. I'm not. I -- yeah.

18           Q     Sure.

19           I guess, in terms of 2020 specifically, were there any particular policies or  
20 governing decisions by mayors and Governors that made you concerned about fraud or  
21 that you heard mentioned as a reason that fraud could occur?

22           A     Well, there was no Governor or mayor that allowed any machine to be  
23 inspected afterwards to see --

24           Q     Uh-huh.

25           A     So that was quite disturbing.

1           The media labeled it "the big lie," you know, instead of having a dialogue. I  
2 mean, I think if the right would've won in such a manner, I think we would've opened up  
3 the books and seen, you know -- now, there are cases -- I think when Al Franken was  
4 elected that they suddenly found all these ballots, you know, like, in the trunk of a car.

5           So I think that the left -- this is one of the reasons that I don't align with the  
6 left -- is dishonest, mainly because truth, in my opinion, is not a value of theirs, mainly  
7 because if your approach is that possibly a God does not exist or you don't hold the God  
8 of the Bible as someone who has a place in your life, why should you not lie? Why  
9 should you not do anything? I mean, just because you feel it's wrong or -- but we don't  
10 do it, because we think that a good God tells us it's wrong to do, ultimately.

11          Q      Understood.

12          Why do you think Governors, mayors in left jurisdictions, as you've been  
13 describing them, are able to get away with this massive vote fraud, as you've been  
14 recounting to us?

15          A      I don't know. I don't know. That's the shock. This is not the first -- I  
16 mean, this is the first time it's come up. I mean, perhaps it may have happened in the  
17 past.

18          I think they in some way weaponized COVID to institute things like early voting,  
19 voting by mail. Right? Instead of a voting day, now we had a voting month. I think  
20 they weaponized the situation to kind of -- to ultimately get what they wanted at the end.

21          So, I mean, it's easier to hide votes when they come in the -- for example, I think it  
22 was in Virginia, where people would put the ballots in, there was a little slot open in the  
23 envelope that they provided that showed whether the person voted Republican or not,  
24 right? Because this encourages people to just dump those.

25          There's many -- there was many -- there were different examples given. But,

1 again, this is something that in my lifetime I never saw. So it's all new to me. And I  
2 reacted the best way -- and I aligned myself with the party that I think best represented  
3 my interests. Yeah.

4 Q So you said this is the first time in your lifetime that these allegations have  
5 come up.

6 A No.

7 Q When were you first -- oh. Go ahead.

8 A No. It's the first time -- I mean, not that -- well, yes, the first time they've  
9 ever come up in the news, I mean, who's been preoccupied with this. We've seen it in  
10 other countries, but who would've thought that this would occur in America?

11 Q So where do you remember first hearing about these allegations?

12 A Soviet Union, China, Cuba.

13 Q Oh, I meant in the context of 2020.

14 A Oh, never. Never.

15 Q Sorry. My question is, where did you first hear about allegations --

16 A Oh, in the election --

17 Q -- of fraud in 2020? Yeah.

18 A Yeah. Election night, people thought that Trump was going to win, and  
19 then when he didn't win, people -- little things about how many main polling places shut  
20 down early. It seems that COVID had a big part in how votes were counted, when they  
21 were counted, who was allowed to be present.

22 You know, so that's clearly the first thing you look at when your candidate loses:  
23 if the game was played or the process was done correctly, I mean, without any  
24 interference.

25 And there were people, for example, Giuliani and -- I forgot the name of the

1       lawyer that was with him, the lady -- who were adamant that there was fraud that took  
2       place.

3           And then I listen to talk radio a lot, and I heard other examples, right? I mean, I  
4       receive news the same way everyone else receives news. I noticed that the right was  
5       giving over one narrative and the left was giving over another narrative. So, I mean,  
6       that's how I found out, yeah.

1

2 [12:11 p.m.]

3

BY [REDACTED]

4 Q Why were you so sure President Trump was going to win?

5 A I think that it wasn't just me. I mean, he was -- the understanding was  
6 that -- the understanding -- it's just like how people were sure that Hillary Clinton was  
7 going to win. All the polls were pointing that way in the vast majority of cases.

8 I think the average American supported Trump. They loved the economic  
9 benefits of having Trump in office. It was hard to believe that people would vote  
10 essentially what we're going through now, they would vote tyranny into their lives.

11 From high inflation, high gas prices that now they're trying to link to the war,  
12 ultimately a mismanagement, I mean, from COVID, from people being fired from their  
13 jobs because President Biden threatened to institute a law that any company with more  
14 than a hundred employees had to coerce their employees to get vaccinated.

15 I think most people saw this coming, and it's hard to believe that they would  
16 choose this over Trump.

17 Q Did Mr. Trump's claims about election fraud help expose you to the idea that  
18 this might've been occurring?

19 A It wasn't so much Donald Trump. He didn't say much after the election.  
20 His staff, they were the ones leading the fight against the fraud, right? I mean, I think  
21 Donald Trump, as a matter of fact, I think it would have hurt him if he was the only one  
22 saying this.

23 Q In terms of his staff, do you remember a specific name? You just  
24 mentioned Rudy Giuliani. Do others stand out to you?

25 A Yeah. What's the name of the blonde lady, unleash the Kraken? I don't

1 remember what her name is.

2 Q Sidney Powell?

3 A That's it, yeah, her. She's the one who was -- she's a very high profile  
4 lawyer, and she was arranging the case -- or, like, these cases -- to propose them to the  
5 supreme courts of every State or whatever. Yeah, so it was predominantly them.

6 Q What about before the election, did President Trump make any claims or  
7 arguments before the election that stuck out to you?

8 A I think so. I mean, he mentioned something about possibly them cheating,  
9 and he mentioned something about there being a rigged system. But that's the bulk of  
10 what I remember before the election.

11 [REDACTED] Thank you.

12 Back to you, [REDACTED]

1

2 BY [REDACTED]

3 Q I want to get to talking about some of the specific events leading up to the  
4 6th. So I'd like to start with the rally in Washington, D.C., on November 14th.

5 You attended that rally, correct?

6 A Correct.

7 Q Okay. Can you just tell me, well, start generally, just tell me about that  
8 rally, how you ended up there, and what your goals were going there?

9 A So the goal initially, because this is my first rally -- and I think it was really  
10 their first, the Proud Boys' first rally that was like this, anyways.

11 I was asked to go to provide security for a few Congressmen, a few conservative  
12 organizations. So that's all I did during the whole rally, was basically walk around, take  
13 these people from hotel to hotel, from rally to rally, from stage to stage. The guys were  
14 standing in front of the podiums, yeah, escorting people down and up.

15 Yeah, so that's what I did in the first, second, and third rally.

16 Q Okay. And just we'll take them one at a time, so just focusing on November  
17 14th.

18 Who asked you to provide security?

19 A I don't remember. I don't remember who asked me. Give me a second.  
20 I don't remember. I mean, it was -- at that time I was in Vice City, before the split.

21 Q Was it another Proud Boy or somebody --

22 A Oh, no, no.

23 Q -- outside of the Proud Boys?

24 A No, for sure it was -- like, my only connection to politics is through the Proud  
25 Boys, I don't know any political figure outside of that.

1           Q    Okay. Did you ever have any conversations with Mr. Tarrio about providing  
2 security?

3           A    No. No. He wasn't as accessible when he was chairman as he was, let's  
4 say, now. Well, now he's in jail, but when he was -- just because he lost support of the  
5 club -- or at least half the club. Yeah, so back then no one really spoke to him directly,  
6 but perhaps like presidents and stuff.

7           Q    We might actually be able to pull up -- well, let me ask you a couple  
8 questions first.

9                 Am I right that you traveled to D.C. for the 14th on, like, a chartered plane or a  
10 private plane?

11          A    Yes.

12          Q    Okay. And was the person who asked you to provide security for the 14th  
13 on that plane with you, do you remember?

14          A    I don't. I mean, I assume so. I mean, just because I would say probably  
15 eight or seven guys from Miami went to that rally, and they were all on that plane. I  
16 think some people drove up. But still it wasn't more than ten guys from Miami.

17                 But in terms of providing security, I mean, I know that Enrique Tarrio knows a lot  
18 of these people that I did security for, just because occasionally while I was walking them  
19 over, I mean, he would come and say hi to them or whatever. But I don't remember  
20 exactly who made the connection.

21          Q    So somebody in the Proud Boys, in your Vice City group, told you about  
22 providing security or asked you to provide security?

23          A    Correct.

24          Q    Do you know who, even if you can't identify exactly who that person was, do  
25 you know what outside group or person was asking the Proud Boys to provide them

1 security?

2 A Outside of -- you mentioned the other, Bianca.

3 Q Uh-huh.

4 A And I met her there. Outside of her organization, I didn't know anyone. I  
5 mean, supposedly they were famous. There was this kid that we were providing  
6 security for. It's like a short Black kid who was a great speaker. What was his last  
7 name? Crump. No. Crump, I think, was his last name. I guess he's like a famous -- I  
8 mean, people told me he was famous. But he -- so we escorted him a few places, onto  
9 the podium as well.

10 Q Is that C.J. Pearson?

11 A No. No, his last name was Crump.

12 Q Oh, Crump, okay.

13 A Yeah, yeah. His last name for sure was, like, Crump, yeah.

14 Who else? There was a Congressman -- what was his name -- maybe from  
15 Massachusetts? No, I'm not sure. Or it was like an Irish-sounding name.

16 But I'm not saying that they reached out to us. But when I was there, we  
17 partnered up with other security companies. As a matter of fact, they gave us a pin that  
18 people knew from the rally that they let us in and they don't let other people in, because  
19 we're escorting people.

20 So there were security guys that were, like -- I mean, the other outfits, not -- like,  
21 not like Oath Keepers or Three Percenters or -- yeah, just like actual security outfits that  
22 we worked along with, and they basically -- we took care of who they took care of, yeah.

23 Q Couple questions about that.

24 Do you recall the name of the other security groups?

25 A No. No. Because they weren't wearing any -- anything that was

1 identifiable as -- you know, but you can tell they were organized, yeah.

2 Q Okay. You mentioned Oath Keepers and Three Percenters. I'll come back  
3 and ask you some questions about that in one second.

4 Was 1st Amendment Praetorian one of the groups you heard about at that time?

5 A I never heard of them.

6 Q Okay. You described a pin that you were given when you got there on the  
7 14th. Can you talk about that?

8 A A pin.

9 Q Yeah.

10 A I think it was either, like, a four-leaf clover or maybe a paw. But it was like  
11 a gold, just identifiable thing, so that other security guys could know who you are and  
12 who you're taking and something like that, yeah.

13 Q And do you remember who gave you that pin?

14 A One of the other security guys, not a Proud Boy.

15 Q How many Proud Boys were a part of the group that were providing that  
16 security or that received that pin?

17 A I think it was maybe just two of us, me and some guy that was with me. I'm  
18 not sure who else was doing security for anyone else, but at least with the group  
19 that -- with the people that we were attached to, it was me and some other guy, yeah.

20 Q Okay. And you don't know who the other guy was?

21 A I don't know. I'd have to look at pictures. I don't remember. I mean,  
22 everyone was wearing a mask. I don't remember.

23 Q Let's actually -- we do have a picture of the group that you traveled with, so  
24 we can pull that up.

25 Can we pull up exhibit 15?

1           And, sorry, this is a little bit blurry. We can zoom in for you, and we can look at  
2 some of the names. But let me know if this sort of refreshes your recollection of who  
3 that second person might've been. And you can direct us to zoom in anywhere you  
4 want.

5           A    That person wasn't from our chapter. I mean, it was from some other  
6 chapter.

7           Q    Okay. So it wasn't somebody that you traveled with?

8           A    No. No.

9           Q    Okay. Let me ask you a few questions -- and we can leave this photo up for  
10 now -- about the plane.

11          How did you get invited to travel on the private plane?

12          A    Let me see, who was it? I was going to buy my own ticket, and I think that  
13 Gilbert told me, "Oh, don't worry, I could try to get you on the plane." Yeah.

14          Q    Okay. Do you know who was organizing the plane or who arranged the  
15 plane?

16          A    No, I don't. I don't know.

17          Q    Okay. Then I take it you don't know who paid for the plane?

18          A    That's for sure, I don't know. Whatever -- whoever paid for it paid a lot of  
19 money. It was all you can eat in there. It was pretty fancy.

20          Q    Okay. Did you ever ask who paid for the plane?

21          A    Yeah, I did ask, and they didn't know either, you know. I mean, I didn't ask  
22 Enrique.

23          Q    Uh-huh.

24          A    We never really talked to Enrique like that. I mean, he was always on his  
25 laptop doing his own thing, you know, but I asked the other guys, you know, and they

1        were, like, they don't know, don't worry about it.

2            Q     Do you recall who you asked that question to?

3            A     I may have asked Chris.

4            Q     Chris Barcenas?

5            A     Yeah, yeah.

6            Q     Okay. Can we kind of go around this photo and you tell me what you know  
7        of each of these people? Are all of these people part -- or at that time, were they part  
8        of the Vice City chapter?

9            A     Yes.

10          Q     Okay.

11          Can you tell me, do you know Alexander Bouzakis?

12          A     Does he have another name?

13          Q     His last name might also --

14          A     Most people don't give their names. I mean, that's a thing. It's like  
15        everyone was encouraged to only go by their aliases.

16          Q     Okay.

17          A     You mentioned Chris because he was exposed. I mean, we all found out  
18        when he was -- like, some doc search exposed him and got him fired. But everyone else,  
19        in terms of their personal names, like, I wouldn't know.

20          Q     Can we zoom in on the photo a little bit so we can see faces a little bit  
21        better?

22          And if you can see the arrow that's pointing to -- I know it's really grainy, my  
23        apologies -- but behind Chris, it looks like one of those arrows is pointing to -- you can see  
24        Alexander Bouzakis in the back.

25          Do you remember taking this photo? Do you remember who was standing in the

1 back there?

2 A In the back of who?

3 Q In the back of the photo, he's the very back person.

4 A You mean the shorter guy with, like, a white goatee?

5 Q No. To the --

6 A Oh, the left?

7 Q Yeah, to the left, as the photo is oriented. You can't really see him very  
8 well.

9 A Wait a minute, wait. Okay. You mean next to Gilbert?

10 Q There's Gilbert, and then to the right there's another individual, and then  
11 even more to the right of him. It's the one, you see he's got a yellow -- there is like a  
12 yellow neck in the photo that's kind of called out above?

13 A Oh, up there. Up there.

14 Q Yeah. He's got the yellow neck tie around him.

15 A I don't know who that is.

16 Q Okay. Do you know the kind of nicknames of -- what was Chris Barcenas'  
17 nickname?

18 A I think it was Little Chris. I don't know if he had a nickname. I mean,  
19 Chris, for some reason -- but they call him Little Chris. But I don't know -- or, like, he had  
20 a name but he kept on changing it, right? But I always knew him as -- I mean, when I got  
21 to know him, I would call him Chris, yeah.

22 Q Okay. What was Gilbert Fonticoba's nickname?

23 A He didn't. I mean, he went by Gilbert.

24 Q Okay. And then did -- do you know, did this plane have any association  
25 with -- or the organization of the plane have any association with Bianca Gracia?

1           A    I don't know. I mean, she never went on the plane. I never saw her, you  
2       know, at the airport or anything. But I don't know.

3           Q    Okay. Let's talk again for one more second about this pin that you were  
4       given. You said the other security groups that were there were also wearing the same  
5       pin?

6           A    The group that was with us. That means we probably -- we were two guys,  
7       and they had probably six guys. And they all had this pin. And when they knew that  
8       we were securing the same people and we were walking through, like, very dense areas,  
9       they gave us this pin to identify us with, whatever, with other people who, I guess, when  
10      they saw the pin, they knew that we were providing security.

11          Q    Okay. Were there other pins? Like, did different groups have different  
12      pins, or was it just the one that you saw?

13          A    I don't know. Our group only had this pin. You know, our group, meaning  
14      the people we were walking and escorting. I don't know -- I'm pretty sure that every  
15      other group must've had some identifiable marker, yeah, because there were so many  
16      people, like, at the first rally.

17          Q    Okay. We have a little bit clearer picture version of that photo, so let's try  
18      to zoom in one more time.

19          A    Uh-huh.

20          Q    So let's zoom in.

21          A    Now, at this time -- this is in November -- so I'm only -- as a matter of fact,  
22      here I wasn't fully a Proud Boy yet. I think I was a first degree. So I've only been in the  
23      organization for a month. So, like, I don't know too many of these guys personally,  
24      because I live in Fort Lauderdale, and I've always lived in Fort Lauderdale. I mean,  
25      whatever, I grew up on the beach, but while all these guys are in south Miami. So

1 personally I don't know too many people. Gilbert I know because everybody knows  
2 Gilbert.

3 And the guy who died, I know, like, John Rachman. And then Chris, I sat next to  
4 him on the plane. And Gabriel I know, just -- I mean, they're the ones who are, like,  
5 administrative of, like, of Vice. Yeah, in terms of personally, I don't know too many  
6 other people.

7 Q How did John Rachman die?

8 A [REDACTED]. [REDACTED]  
9 [REDACTED]

10 Q Okay. And then did you know Pedro Barrios at all?

11 A I took him home once. And also he also goes by his first name, I'm pretty  
12 sure. Yeah, I took him home once -- I think that day, actually, like, when we arrived, like,  
13 I dropped him off at home.

14 Q Okay. I want to show you another picture. This is an Instagram post -- if  
15 we could pull up exhibit 16 -- this is an Instagram post from Pedro Barrios.

16 Then we can zoom out of this one. That's fine. That's good there.

17 Have you ever seen -- do you follow Pedro on Instagram?

18 A No.

19 Q Okay. If you see in his post, there's obviously the photo of the plane that it  
20 looks like you took, and he's wearing the same clothes. I mean, I assume it's the same  
21 day.

22 Do you recall the Trump name being on the tail of the plane?

23 A It was not.

24 Q Okay. So you think he added that?

25 A He must've. I mean, I would've noticed that. I would have noticed that.

1 Q Okay.

2 A Actually, I mean, I -- hold on. I'm thinking back. This guy that you showed  
3 me a picture with the yellow thing was hanging around us in D.C., you know. Yeah, I  
4 mean, he was hanging out with us. Yeah, but I don't know his name. But he was there  
5 with me, yeah. I mean, now I remember.

6 Q For the November 14th rally?

7 A November 14th, and I saw him also on January 6th.

8 Q Okay.

9 A Right.

10 Q We can pull down exhibit 16.

11 The earlier one, exhibit 15, where you were standing outside of the plane with the  
12 other Vice City Proud Boys, was that -- was that taken on -- or what day was that taken  
13 on, do you know?

14 A Let's see. Do you know what day the rally was at, that was --

15 Q On the 14th.

16 A Yeah. But was that a, like, a --

17 Q Saturday.

18 A Okay. So that must've been Sunday, because we left -- we left that -- that  
19 following morning.

20 Q So that was on the return from D.C.?

21 A Correct. So that would've been on -- I don't -- now I'm thinking if we took it  
22 before or after.

23 Q There's one other. Let me --

24 A Well, you know what, I think that photo was taken at D.C., like, at the D.C.  
25 airport. Yeah. I don't know -- I don't think we're in Miami there.

1           Q    I'm going to show you one other quick photo, and maybe this will help you  
2   out.

3           Can we pull up exhibit 17 also?

4           A    Okay. So this is definitely D.C.

5           Q    Yeah. Okay. And if you look back there, you can see yourself in the back.

6           Can we zoom in a little bit on Mr. Meza in the photo?

7           It looks like you're wearing a gray shirt here.

8           A    Right. So that's D.C. because I'm wearing a hoodie, because it's cold there.

9           Q    Okay. Yeah.

10          A    The other one must've been on the way there, I mean, unless -- yeah, yeah.  
11          No, unless I took it off or it was hot or --

12          Q    So we think that the photo of just the Proud Boys right outside the plane was  
13   when you were heading up to D.C. from Miami?

14          A    Right. Okay.

15          Q    And was that on the day before, was that on Friday the 13th?

16          A    That would've been the day before, yeah.

17          Q    Okay. So you attended the rally on Saturday the 14th, and then this photo  
18   is taken in D.C. on Sunday the 15th, and you're returning to Miami at this point. Is that  
19   right?

20          A    That's right, yeah.

21          Q    Okay. So then I just wanted to ask, so obviously this photo is with some  
22   other folks as well. And you're holding the "Latinos for Trump" banner.

23          Do you know if the other people in this photo were also taking a private plane?

24          A    I think so, because that was a private airport.

25          Q    Okay.

1           A    Yeah.

2           Q    Did you have -- from this time where you met with these folks associated  
3         with Latinos for Trump, did you get any sense that both of the planes were kind of like  
4         organized together or that it was Latinos for Trump that might've paid for your plane?

5           A    I don't know. I mean, I don't know how I can tell. I don't know.

6           Q    I just didn't know if you talked to anybody else, like, during -- while this  
7         photo was getting taken, about, you know, the plane that they were taking.

8           A    No. No.

9           Q    Okay. You can take down this photo.

10          I want to ask a little bit more about Bianca Gracia.

11          How did you first meet her?

12          A    I met her in November when I got there. And she's the one -- I mean, they  
13         told me, don't -- don't let her out of your sight. Supposedly she has had some threats on  
14         her life, and we were just there escorting her, yeah.

15          Q    Okay. So one of the people that you were providing security for on the  
16         14th was Bianca Gracia?

17          A    Yeah, correct.

18          Q    And did you -- and I think you said you don't recall anybody else that you  
19         were providing security for. Is that right?

20          A    Well, that guy Crump. You can look him up. I mean, he must've -- hold  
21         on, just let me google him quick.

22          Q    Sure.

23          A    Okay. Crump, I think, was the guy's name. Okay.

24          [REDACTED] Is it Chandler Crump?

25          The Witness. Maybe. I mean, he looks much older now, but I mean he must've

1       been, like, 16 years old when he was there. And he was just -- I mean, just basically,  
2       like, riling the audience up. I'm pretty sure.

3           I remember his name because it's so close to Trump, you know, I'm like Crump.  
4       And they were saying, this is going to be the next President or something.

5           That's the only -- that's the only notable person. There wasn't anyone else that I  
6       would remember.

7           BY [REDACTED]:

8       Q     Okay. I'm going to give you a couple different names of people and  
9       organizations, and tell me if it jogs your memory about people that you might've worked  
10      with when you were providing security.

11      So are you familiar with Women for America First or Amy or Allie [sic] Kremer?

12      A     No.

13      Q     Okay. Have you heard of Women for America First?

14      A     No.

15      Q     Okay. How about, do you know if you were providing security for or dealt  
16      at all with Ali Alexander while you were there?

17      A     I don't know who that is.

18      Q     Okay. How about Roger Stone?

19      A     I know who that is, and I wasn't providing security for him, but there was a  
20      party that -- there was a party that I -- I don't know if it was Bianca -- because we had to  
21      go to every one of these parties and wait outside.

22           And then I went to go call my wife, and then one of the guys that was doing  
23      security there, said, "Look, I just took a selfie with Roger Stone."

24           Yeah, so he was there -- when was that? Heck, it may have been -- it could have  
25      been January 5th. I don't remember, but it was outside of -- what's that name of the

1 hotel? Like the W -- no. Was it the W?

2 Q The J.W. Marriott?

3 A It's the one in, like, a corner that got attacked by antifa.

4 Q The Willard?

5 A The Willard, that's it. Yeah, the Willard.

6 So he was there somewhere, you know. And I also took a selfie with it's like the  
7 former prosecutor of New York State or something like that. I don't remember. I  
8 mean, I think I have the selfie somewhere on my phone. That's the only person that I  
9 knew, like, hey, you know, I know who this guy is.

10 Yeah, that's it.

11 Q Okay. I want to ask a little bit more about the second Proud Boy, whose  
12 name you can't recall. Do you recall anything else about him, like, where he was from or  
13 even what he looks like?

14 A I know he's from Miami, and he's a tall guy.

15 Q Maybe I misheard you earlier. Was he in your chapter?

16 A He was from Miami, right? I mean, he was on the plane. But I didn't  
17 know the vast majority of people in that chapter. But I got to know some of them when  
18 we went to D.C. because that's the only really time -- that's the only time we really hung  
19 out together. Because in Miami, it's always like a bunch of guys and stuff. But most of  
20 those guys didn't go, yeah.

21 Q Okay. Sorry, I must've misheard you. So the second Proud Boy that was  
22 providing security with you that also got a pin was on the plane with you?

23 A No, no, no. This guy was hanging around. There were many Proud Boys  
24 hanging around all over the place. But in terms of the guys doing security, it was me  
25 and another guy, right, you know.

1           But this guy hung around, and there's some other guy named Al -- well, like not in  
2       that picture, but he was there, I think, for January 6th, like, also hanging around. I  
3       mean, because they all sort of knew the same people.

4           I was new, so then I didn't know exactly all the people that these people knew  
5       from before. I mean, perhaps they were affiliated with other organizations before the  
6       event, yeah.

7           Q     Okay. So still just talking about the second person that got a pin, he was  
8       from Miami but was not --

9           A     No.

10          Q     -- on the plane?

11          A     He was not from Miami. The guy who was officially doing --

12          Q     Okay. Let's start over.

13          A     Yeah, okay.

14          Q     Let's start over with the other guy who got the pin, who was a Proud Boy,  
15       right?

16          A     Correct.

17          Q     Okay.

18          A     But from some other chapter.

19          Q     Okay. And where was he from? Do you remember?

20          A     I don't know. I'm not sure what chapter he was from.

21          Q     Okay. Do you remember anything else about him at all?

22          A     He had tattoos on his neck. I mean, I think there was, like -- like, a pyramid  
23       or something. That's all I remember, that guy. Yeah.

24          Q     Okay.

25          A     We didn't really -- oh, so, we're providing security, but I was on one end and

1       the other end, and I was -- because I speak Spanish. There's a lot of the Latinos for  
2       Trump who only spoke Spanish, you know, so I was, like, translating for a lot of people.  
3       But, yeah, I was too preoccupied, yeah.

4           Q     How were you selected among the other Proud Boys to be one of the two  
5       that provided security?

6           A     Well, they asked me, and I think it's because I used to be in the military. So  
7       that's why, I mean, they asked if I wanted to do that, yeah.

8           Q     Were you paid at all for providing security?

9           A     No.

10          Q     How about, like, reimbursed for any expenses or travel or anything like that?

11          A     Not the first time. The first time, I mean, outside of -- as a matter of fact,  
12       when they offered me this trip on the plane, I already had a ticket, and it was a  
13       nonrefundable ticket. So that came a little too late.

14          And I believe -- I believe the second time I may have also paid, but the last time it  
15       was paid for. Or it's like either reimbursed or -- yeah, it was reimbursed the last time.

16          Q     The last time being January 6th?

17          A     Correct.

18          Q     And do you remember who reimbursed you for that?

19          A     Bianca.

20          Q     Other than the November 14th event, which we're talking about now,  
21       there's a December 12th event that we'll talk about in a second, and then January 6th.

22          Have you ever provided security at any other events?

23          A     Never.

24          Q     Okay. And do you have any kind of, like, certification or any training in  
25       providing security?

1           A    I mean, I was in the infantry.  I was a paratrooper.  Apart from that, well,  
2   in Israel, I lived in the settlements.  So, I mean, I would do security in my settlement.  
3   And that's it really.

4           Q    Okay.  How did you prepare to provide security for the 14th?

5           A    I think the goal was to look intimidating.  I mean, most -- or many of the  
6   Proud Boys wore, like, tactical vests.  So I had a tactical vest on.

7                 And in the first rally, I don't think I had a helmet, but for the second and third I did.  
8   So, I mean, just because it was -- that we were exposed to antifa the first event and were,  
9   like, how can we prepare for the next?

10              So besides that, that's, you know, we take the lead from the other security  
11   agencies, you know, like, stay on this side, let's walk this way, and, you know, kind of  
12   cover the rear and stuff like that, yeah.

13           Q    Was the tactical vest yours?

14           A    Yes.

15           Q    And how about the helmet that you mentioned?

16           A    So the helmet I picked up the second trip I was there, and I actually bought  
17   it, because I was staying maybe two blocks away from that Walmart.  There's like a  
18   Walmart there.  And I walked and I picked up some gloves, and I picked up, like, a  
19   bicycle helmet, yeah.

20                 I mean, for the second time.  And then the third time, I ordered a helmet from  
21   Amazon.

22           Q    Okay.  Where did you get the tactical vest -- or when did you get that  
23   tactical vest?

24           A    I bought that on either eBay -- not eBay -- on -- on -- it was a marketplace.  
25   It was either Craigslist or Facebook Marketplace.  It was a local vest of, I mean,

1 somebody who was selling it, yeah.

2 Q And that was for the 14th, or you had bought it a long time before that?

3 A For November.

4 Q Okay.

5 A For November, yeah.

6 Q So about how far in advance did you find out -- or did you find out you were  
7 going to be providing security?

8 A I don't remember. I don't. I mean, it must've been -- I think I knew about  
9 the event a week before. Because these events typically aren't planned months in  
10 advance. They'll give you, like, 2 weeks, like, okay, they're doing this.

11 I didn't know that I was going there just for that. I mean, I thought I was just  
12 going to go to go. And then they presented me with this opportunity, yeah. So I said  
13 sure.

14 Q And then you mentioned a couple other groups. You named Oath Keepers  
15 and Three Percenters, and you said that, I think, that it wasn't them that you were  
16 coordinating security with for the 14th. Is that right?

17 A No. I didn't say it wasn't them, because I don't know. I mean, I don't  
18 know. It's hard to identify these guys. I mean, I saw a bunch of them on January 6th  
19 just because they had a patch on. So perhaps -- I mean, they weren't even there for  
20 November, because I didn't see any patches that said Oath Keepers.

21 Three Percenters, I've seen that patch all over the place. And I didn't know what  
22 it was. I mean, I thought it was some -- it looks like -- I don't know. There's some  
23 T-shirts that look like it.

24 But they're very large. And, I mean, I met a bunch of bikers that were  
25 supposedly Three Percenters. Yeah. But I don't think Three Percenters offer security.

1 I mean, they just don't seem like that type, I mean. But I would assume that's  
2 something that Oath Keepers would probably be involved in, from at least the ones I met,  
3 because they're very -- I mean, they're all prior military.

4 But in terms of who ran the security, I couldn't tell you who they were.

5 Q Was there anybody else that you talked to, maybe not the actual security  
6 guards, but anybody else that you met on the 14th that you thought was coordinating  
7 some of that security work?

8 A The initial contact was Bianca. We were doing security for her and then  
9 everyone around her we ended up doing security for.

10 So that was the actual contact of, you know, because I wouldn't know who else to  
11 go to, because, I mean, I'm not from D.C. I mean, I didn't know. But she was the one  
12 that basically arranged who I was doing security for, yeah.

13 Q Does the name Charles Bowman mean anything to you? Do you know  
14 Charles Bowman?

15 A It sounds familiar. Charles Bowman? Just elaborate a little more. I  
16 mean, it does sound familiar.

17 Q I had earlier asked you about Women for America First, and I'll tell you that  
18 that was the organization or one of the organizations that was involved in planning for  
19 November 14th. And Charles Bowman was somebody associated with that group,  
20 Women for America First, and he dealt a little bit with organizing some of the security  
21 groups for the three events that we've talked about.

22 A No. Now, there is someone who comes to mind, and this, I think, appears  
23 in one of my videos. I don't know, like, if you ever saw the videos on the channel  
24 proudboy.tv. So there, I mean, I would basically interview everyone around me.

25 So there was this guy, O'Shaughnessy, who was, I think he was there providing

1 security. He was Bundy's personal bodyguard in the -- like, something Bundy Ranch or  
2 something like that. Are you guys am familiar with that?

3 Q Yeah.

4 A So if you go to my proudboy.tv, I interview him for, I don't know, 10 seconds.  
5 I asked him, like, how does he feel about the Proud Boys. But he was there, I think,  
6 providing security.

7 Q And did you say his name was Shaughnessy or O'Shaughnessy?

8 A I think it's O'Shaughnessy. I mean, you'll see him. It's the guy dressed all  
9 in black on, like, on one of my videos on proudboy.tv. I mean, supposedly he was  
10 famous. People knew who he was. I mean, this the first time I heard of him. But he  
11 was the private -- like, he was the private bodyguard -- I mean, that was his -- what made  
12 him famous, of Bundy Ranch, of the guy at Bundy Ranch.

13 Q Okay. And do you remember what he was doing there on the 14th or who  
14 he was guarding?

15 A I don't -- I mean, he may have been guarding that guy. Like, I don't know  
16 what happened. Did they shoot this guy Bundy or something? Is he still alive?  
17 Because I felt that maybe he was still guarding him. I mean, he was -- he didn't look so  
18 much like a civilian. I mean, he looked like he was, like, pulling some type of security,  
19 from my perspective.

20 Q Okay. Great. We can come back to Charles Bowman. Just let me know  
21 if anything we talk about kind of jogs your memory about him.

22 A Okay.

23 Q Let's see. So you mentioned -- so did you say you didn't meet, as far as you  
24 know, you didn't meet any Oath Keepers for the November 14th event?

25 A I didn't know of Oath Keepers till January 6th. I saw a bunch of guys, a lot

1 of them in tactical gear, with shirts and patches that said Oath Keepers, and I never heard  
2 of them till then.

3 And then I inquired. I mean, I was thinking of becoming an Oath Keeper just  
4 because I was also prior military, and they just seem to be a little more organized than  
5 the Proud Boys are.

6 But before January 6th, I never heard of them.

7 Q Okay. How about -- so the other Proud Boys that weren't one of you or the  
8 other person that was providing security, were they doing anything in particular, or were  
9 they just attending the November 14th rally?

10 A Well, it was labeled almost as a Proud Boy rally, which, I mean, I guess it  
11 wasn't, but that's how the media labeled it. So Proud Boys came from all over the place.  
12 And then we'd converge in some bar called Harry's.

13 And there was this, you know -- I mean, I'm not -- you know, I may be in the Proud  
14 Boys, but I'm not, in terms of behavior, I'm not much of a -- I don't fit in too much with  
15 these guys, just because I try to be a religious guy. I'm married with kids. I don't -- I  
16 don't drink.

17 So most of the interactions would be like if I was doing some security, let's say, for  
18 Enrique, like, I walked with him a little bit when I would see him walking alone because I  
19 think a week before he got stabbed -- he got stabbed there. So when people would  
20 come talk to him, they'd talk to me too, you know. But apart from that, I mean, I didn't  
21 really build any bonds, you know.

22 Q I was mostly asking if you had heard, like, other than providing specific  
23 security for an individual, had you heard of any Proud Boys organizing in any specific way?

24 So we've heard from some witnesses that Proud Boys were organized, like, in a  
25 box around Freedom Plaza or had set up a perimeter around a certain area. Did you

1 hear anything about that?

2 A I don't remember that far back. In terms of November, I don't remember.

3 I know that we had meetings -- we had meetings -- we had one meeting, like, by  
4 the monument where they were discussing what they -- what they were going to do.

5 But it didn't -- it didn't pertain to guys who were doing security.

6 So, yeah, although I attended the meeting, in terms of who was going to hang out  
7 with who for protection reasons, you know, that people shouldn't, like, linger around  
8 alone.

9 I don't remember anything in particular because, I mean, the guys that were doing  
10 security were always somewhere else doing something else. So, I mean, I knew it didn't  
11 pertain to me. But again, that was so far back, like, I don't remember.

12 Q And that was for -- that was at the November 14th rally, that meeting at the  
13 Washington Monument?

14 A Yes. Yes.

15 Q Okay. Do you remember who was leading that meeting?

16 A Enrique.

17 Q Were there any other people that attended, any other Proud Boys that  
18 attended the 14th that were kind of organizing folks like Enrique was, either maybe  
19 speaking at that meeting or other meetings?

20 A Yes, there were, although I didn't know who they were. I mean, I was only  
21 a Proud Boy for -- well, I mean, I was affiliated with the organization just a month, and I  
22 just received my first degree like a week before that. So I didn't know the key players in  
23 it, especially, you know, I mean, I've never seen these guys from all these small towns. I  
24 mean, all I knew were, like, some of the south Florida guys, and that's it.

25 But, yeah, there's other people who spoke, but I couldn't tell you who they were.

1           Q     Okay. So even given what you know now, looking back, you don't know  
2 who they are now?

3           A     I think I may have heard the name Rufio before. I mean, just because it  
4 stands out, I think Peter Pan. And I know he's one of the guys on the indictment. So  
5 he was part of leadership, but I don't know where he lives. I mean, I know he's not from  
6 south Florida.

7           Q     Okay. So for the November 14th rally, anything that we haven't talked  
8 about yet that kind of stands out in your memory about that day or anything that you  
9 did?

10          A     Well, that was the only time we actually confronted antifa -- or were  
11 confronted by antifa -- and that's -- I mean, I'm not sure if they had more people in  
12 November than in December.

13          But I got maced on that day in the evening when antifa came out. There was a  
14 brief -- there was, maybe, like a 2-minute fight between the Proud Boys and antifa. And  
15 I was in the middle of that and somebody maced me. And I was out, not seeing  
16 anything. I think there's a few pictures of me online with like, Milk of Magnesia in my  
17 eye they threw, you know, to, in some way dilute the mace, yeah.

18          So that's what I remember, 'cause that was, I mean, the most memorable part of  
19 it.

20          Q     Can you tell me a little bit more about that fight, where did it happen, and if  
21 you can a little more specifically, when did it happen?

22          A     Well, antifa was going from corner to corner. They were disrupting, they  
23 were lighting fireworks on people who were eating, whatever.

24          So if antifa was in one corner, the Proud Boys were chasing them, trying to get to  
25 them, but the cops kept on putting, like, bicycles in between, you know, us two. So we

1        were never able to confront them.

2           So it was all over the whole region from Harry's and that whole area there, I think  
3        there was a park on the corner, but it was probably like a 6-mile radius, and we'd run to  
4        one corner because we know antifa's on the other block. And then probably, like, 40  
5        policemen would put their bikes in the way.

6           So that went on for, like, 2 hours, till we finally found an opening. I don't know if  
7        the cops, I think, just let us go through, and for, like, 3 minutes, there was fighting  
8        between antifa and the Proud Boys.

9           Q     So you mentioned that the cops were trying to keep you separate?

10          A     Correct.

11          Q     Did -- you know, I know earlier you had said you feel like generally the police  
12        appreciate your presence there. Was the 14th an exception? Or what was your  
13        interaction with the police like on that day?

14          A     Oh, no. We did -- I spoke to many police officers, and they were pro us.  
15        However, they still have a job to do. And their job, although they know that it was  
16        initially antifa terrorizing Trump supporters and people eating in restaurants, they  
17        couldn't just let a bunch of guys just beat them all up, even though there were more  
18        antifa than of us.

19          I mean, this is typically the attitude of law enforcement, that they support us.  
20        However, if they want to keep their job, they can't just let us clean up the streets, right, I  
21        mean, in a reactionary way.

22          Yeah, but I'm -- there's no doubt in my mind that in the back of their head they're  
23        hoping that the Proud Boys would step in and do what they can't do legally.

24          Q     So I know you said you were kind of playing this game, a little bit of cat and  
25        mouse, where antifa's on one corner and you're going to an opposite corner.

1           Had you done anything to prepare or, like, done any research on antifa or what  
2       they were going to be doing that day before you got there on the 14th?

3           A     No. I didn't even know antifa was going to be there, I mean, en masse.  
4       We were -- I don't remember the hotel everyone hung out at, but it wasn't far from that  
5       Walmart. What's that hotel?

6           Q     It's not the Hotel Harrington?

7           A     Yes, Harrington, that's it. So people were hanging out in the front.  
8       There's a little pub on the side, you know. And then all the reports started coming in of  
9       antifa attacking the Trump supporters that were leaving the rally and people eating in  
10      restaurants. Also the Willard, they -- like, the Willard had to barricade the doors  
11      because antifa was, you know, throwing chairs and all that stuff.

12           So we started gathering as many Proud Boys as we could -- because most of them  
13      already left, this was after the rally -- and we marched towards that area, where the  
14      reports were that antifa was still. I mean, there were probably 300 or 400 of them, and  
15      there was maybe 80 of us.

16           And that's -- you know, so that night, I got introduced to that. I mean, I was  
17      never exposed to confronting antifa or chasing anyone down like that, yeah.

18           Now, the second time we were there a similar thing happened, and the cops also  
19      separated the two, but this time antifa was in one location, and there were hundreds of  
20      them. And then we walked up to that location, but the cops were barricading it.

21           You know, the guys, the leadership of the Proud Boys were always good in making  
22      sure that the guys don't get hurt, and if they could avoid a fight, I mean, it sounds a bit  
23      odd to say this, but if they could avoid a fight, they could.

24           So they, of course, if the cops told them to stand down, they would stand down.  
25      And that's the way -- I mean, I thought that perhaps we should still go after them, but,

1 you know, I mean, they -- I mean, I agree now with, like, the decision that Enrique and the  
2 other guys decided not to, you know, continue pursuing them on the second night, yeah.  
3 I mean, on the second event.

4 Q Okay. And then just back on the 14th and that specific fight where you got  
5 maced, how -- I just want to try to pinpoint the time and place a little bit more if we can.

6 A Sure.

7 Q Do you remember, let's go with the time first, do you remember what time  
8 that was?

9 A It may have been around 10 o'clock at night, around there.

10 Q And then I know you said you moved to a couple different corners, but do  
11 you remember any cross streets or any landmarks that were near you?

12 A I don't remember. I know we started off at Harry's. I mean, that's just  
13 the center where all the restaurants would be and everything. And then -- but we  
14 moved from there. But actual streets I don't remember. Yeah, I don't know D.C. well  
15 enough to give you street names there.

16 Q Okay. That's helpful. Thank you.

17 Okay. Anything else about the 14th we should discuss before we move on?

18 A I don't know. Ask me. I mean, I don't --

19 Q Just anything else that you remember. I guess what I'm saying is, I'm ready  
20 to move on unless you have --

21 A Yeah.

22 Q -- something else that you remembered.

23 A No, let's go for it.

24 Q Okay.

25 A Let's move on.

1           Q     I take it you did not attend -- there was a rally in Georgia on November 18th,  
2     in Atlanta, at the capitol. I take it you did not attend that rally.

3           A     I did not.

4           Q     Okay. Let's talk about December 12th then. You did attend the  
5     December 12th rally, right?

6           A     Correct.

7           Q     Okay. And how did you get to the December 12th rally?

8           A     Plane. I mean, my own -- my own ticket.

9           Q     Okay. And so, again, were you asked to perform security in the same way?

10          A     On the second, yes. However, I broke free after, like, a few hours because I  
11     just felt that it was boring. So virtually all the videos I have on my proudboy.tv channel  
12     are from the second trip to D.C., and I just started interviewing people in the audience  
13     and just walking around asking them questions. So that's how the bulk of my day went,  
14     yeah.

15          Q     And for this event on December 12th, the second event, do you remember  
16     who asked you to perform security?

17          A     I don't remember. I mean, it may have been -- I don't know. I was  
18     thinking maybe Gilbert. I mean, just because he was one of the -- like, he is the main  
19     guy I spoke to in our chapter. Yeah. So it could've been him, but maybe Enrique told  
20     him. I mean, I don't know. I mean, I never spoke to Enrique directly like that, yeah.

21          Q     Okay. Was it also maybe Gilbert for the November 14th?

22          A     It was possibly. I mean, Gilbert's probably the, like, the guy I know the best  
23     there. I mean, I -- yeah, I mean, just because he was involved in everything, in terms  
24     of -- I mean, even vetting, yeah.

25          Q     Okay. And then do you remember who you provided security for on the

1 12th?

2 A Well, for the part that I was doing security, Bianca, the same.

3 Q Anybody else?

4 A Not that I know of. I mean, it was -- it's her crew. I mean, it's not one  
5 person. Like, Bianca has an organization called Latinos for Trump. And she's always  
6 with, like, ten people. So all those people, yeah.

7 Q Do you remember around the 12th hearing about Bianca going to the White  
8 House or that Mr. Tarrio also went to the White House with her?

9 A Yeah, yeah. Actually, yeah, I did. I mean, I thought they were going to  
10 invite me, but, like, they didn't have a ticket.

11 So I believe, if I remember correctly, it was early in the morning. It was, like,  
12 7:30 in the morning you had to meet there, but they only got a few slots. So, yeah, I  
13 remember.

14 Q Okay. And what was the -- was it a Latinos for Trump group that was going,  
15 or who went with them?

16 A I don't know. I don't think it was that many people. I don't know.  
17 Because I just saw the pictures -- I think it was the news that mentioned it, that -- because  
18 Enrique got in.

19 But I don't -- they had limited spots. I don't think they were able to just take  
20 whoever they wanted. So, yeah, yeah, I don't know, like, who went --

21 Q When you say -- at first you used the word ticket. Do you remember, were  
22 there, like, specific tickets? Was it a ticketed event? Or why did you use the word  
23 ticket?

24 A So they told me that I couldn't go because they didn't arrange it for me -- or,  
25 I mean, that's why I say ticket, like, it had to be arranged, like, who was going to go.

1 Q Do you remember if they said who was involved in arranging that?  
2 A Oh, I don't know. I mean, I figured it was Bianca. She has all the  
3 connections there.

4 [REDACTED] Okay. Sorry, I didn't realize that our camera wasn't on. We just  
5 turned that back on.

6 Okay. Let's see, it's 1 o'clock, we've been -- 1:09 -- we've been going for another  
7 hour and a half. Would you like to take a break or -- actually, let's do a --

8 The Witness. No. Oh, well.

9 [REDACTED] Let's do --

10 The Witness. I mean, I'd rather just --

11 [REDACTED] Just keep going.

12 The Witness. Yeah. I mean, just so we could knock it out already.

13 [REDACTED]. Okay. All right. We'll keep going.

14 BY [REDACTED]

15 Q All right. Anything else about the White House tour that you recall, or did  
16 you talk to Ms. Gracia or Mr. Tarrio about the tour?

17 A I don't know who told me that I couldn't go. But, no, I mean, I don't  
18 remember anything else.

19 Q All right. So that was the morning of the 12th. And then you said you did  
20 a little bit of security work for Ms. Gracia or Latinos for Trump, but then that got kind of  
21 boring. So then you just spent the rest of the day going around interviewing people?

22 A Uh-huh.

23 Q Okay.

24 A Yeah.

25 Q Do you know of any other Proud Boys for the 12th that were providing

1 security?

2 A This kid named Al. Al, for the second time, he was there officially as  
3 security. I don't know his last name. I don't think that's his real name. But it's this  
4 short guy, like very -- he was, for sure, the shortest Proud Boy I've ever seen.

5 Q Okay. You said for the second time he was providing security. He also  
6 provided security on November 14th?

7 A No. He was hanging around on the 14th, yeah, but he wasn't providing  
8 security. Like, on -- this is why I felt I didn't need to be there on the 14th, because, like,  
9 "Well, you have Al, you don't need me," you know.

10 So then I just started walking around. I mean, I, I mean, sort of connected, like  
11 here and there, but I didn't stay with her the whole 14th, yeah.

12 Q The whole -- sorry, just to clarify, the 12th?

13 A Oh, December.

14 Q December 12th?

15 A December, correct, yeah.

16 Q Okay. Do you know anything else about Al? Is he still in --

17 A Oh, so -- like, he remained in Vice City, and I don't know what happened to  
18 him. I don't know what happened to him. He's -- I know that he used to be in the  
19 Navy, and that's one reason why they got him to do security.

20 Well, actually, no, he worked in security, too, you know, so, like, he had some sort  
21 of security background even currently, but he was in the Navy as well. So, I mean, I felt  
22 you have him, you know, I could do my own thing, and that's why, I mean, I started  
23 recording people.

24 Q When you traveled up to the December 12th event, did you travel with  
25 anybody else, or was it just you by yourself?

1           A    So November -- I'm sorry. When? What day was it?

2           Q    We're talking about the second event, December 12th.

3           A    Uh-huh. So December 12th, I think I traveled alone. I think I traveled

4         alone, yeah. Because, like, January 5th, I traveled with other people as well. So, yeah.

5         But December, I think I traveled alone.

1

2 BY [REDACTED]

3 Q We're talking about the second event, December 12th.

4 A Uh-huh. So December 12th, I think I traveled alone. I think I traveled  
5 alone. Yeah. Because, like, January 5th, I traveled with other people as well,  
6 so -- yeah. But December, I think I traveled alone.

7 Q Okay. And where did you stay when you were in D.C. for the 12th?

8 A There's a hotel behind the -- no. All right, so the first hotel you mentioned  
9 is not the correct one, no, because Harrington --

10 Q Harrington?

11 A -- is next to Harry's. So we never stayed in that hotel.

12 There's another hotel that's much nicer than the Harrington -- the Harrington is  
13 kind of, like, beat up -- that's -- it's more on the outskirts. And I was staying in a hotel  
14 behind that called -- you know what? Hold on. Let me see.

15 I might send it to you. I mean, I think I sent you a hotel booking --

16 Q Is it the Phoenix Hotel?

17 A Okay. So, yes, the Phoenix is not the one I stayed on, but that's the one  
18 where everyone would hang out at, unless you were staying at the Harrington. But I  
19 didn't stay -- I mean, it's a long walk from the Phoenix to the Harrington, you know. But  
20 the Harrington was convenient because people were next to Harry's. So the Phoenix  
21 was where almost everyone was staying at, and then people would hang out there  
22 because there's a little pub on the side.

23 There's a hotel behind that. I think it may have been a Wyndham or something,  
24 but it was a nice hotel. And that's where I stayed. Yeah.

25 Q Okay.

1           A     It's directly on the opposite side of it, like, behind it.

2           Q     Understood.   Okay.

3           And then on the 12th, were you with Mr. Tarrio at all for the 12th?

4           A     Let's see, what did I do on the 12th?   I think I was on the 11th.   I think  
5     when I got there he was hanging out at Harry's, and I was with him, like, providing  
6     security for him.   Yeah.

7           Q     Okay.

8           A     I think.   I mean, I -- because I get December and November confused, but  
9     it's -- it was the same location.   I mean, the locations don't change -- Harry's, the  
10   Phoenix, you know, the Harrington.   That's, like -- that's, you know, for November,  
11   December, and January.   So, yeah.

12          Q     And anything -- let's stick with the day of the 12th and, like, the actual rally  
13     and the events.   Anything notable happen for you during those events?

14          A     Yeah.   There was the guy who got stabbed.   And he was close to me when  
15     he got stabbed.   That was the day I believe they burned that banner.   Right?   Was  
16     that -- yeah, that was December.   That wasn't November.

17          Q     Were you near when the banner was burned?

18          A     Yeah.

19          Q     Okay.   Tell me about that.

20          A     They were -- they went out because they heard antifa was doing their thing  
21     and -- but not everyone, just a few guys, I mean, different groups, went out trying to spot  
22     them.   And I guess on the way -- I mean, that wasn't the only banner.   There was some  
23     other Black Lives Matter -- I think they may have taken it from, they call it Freedom Plaza  
24     or something like that.   But that was one of the banners they grabbed.   I mean, I don't  
25     think they knew it was in front of a church or anything.   They thought it was just like one

1 of the many other banners that was plastered all over the place that didn't actually  
2 belong -- I mean, they didn't have a permit to be posted.

3 So I remember there was another banner -- but it was, like, painted by hand -- that  
4 they grabbed that was a lot bigger than, like, the church's banner. But that one they  
5 didn't burn. They probably would've been -- it was so big, it was, like, a fire hazard.

6 But I saw them burn that initial banner -- I mean, that -- the church's banner.

7 Q Okay. And who was it that burned it?

8 A I don't know, but I know that it wasn't Enrique. Because I saw people  
9 there. But it seems like he took the blame for it afterwards, but he did not burn that  
10 banner.

11 Q Do you know, was he there when it was burned?

12 A Yeah. No, we were all there. We were -- I mean, all the guys who went,  
13 who didn't go home early, converged there in front of Harry's. Yeah, I believe it  
14 was -- yeah.

15 So it was probably 30 minutes after that banner got burned that the guy got  
16 stabbed. And then they just broke it up because it was, you know -- yeah, no -- so we  
17 marched around a little bit, and then that's the time that we saw antifa completely lined  
18 up, and there was cops in front of them. And then we came back to that location. And  
19 I believe that's when the banner was burned, and then that's when the guy got stabbed.

20 Q Was it the -- when the banner got burned, did you then move somewhere  
21 else before the stabbing event happened? Or was it the same place?

22 A Oh, it was the same place. Like, the banner and the stabbing event were  
23 probably a block away, like, from each other.

24 Q Okay. Do you remember anybody in particular that was involved in the  
25 banner burning?

1           A     There was a Black guy -- I don't know if he was a Proud Boy or not, you  
2     know, but he was adamant that he wanted to burn it, I guess because he was Black and it  
3     said "Black Lives Matter," you know, so he felt personally offended, not at the statement  
4     "Black Lives Matter," but at the hijacking, like, of such a concept, you know? And I think  
5     he may have been one of the people who lit it.

6                 I mean, I think it was more than one person who lit it. I mean, somebody had  
7     lighter fluid, and they poured it on, but I think it was being burnt from different edges,  
8     like, and then it just, I mean, lit on fire. Yeah.

9           Q     And then tell me about the stabbing event. So you said about a block  
10   away. That was closer to Harry's, right?

11          A     I think so. I mean, it was near Harry's. I don't know if it was closer than  
12   where they burned, like, the banner.

13          Q     Okay. And then how did that fight unfold?

14          A     Well, because we didn't have any direct interaction with antifa that night, I  
15   think the guys were just, like, bored, you know? And then with drinking and stuff like  
16   that, in my opinion, they began to get a little paranoid, like, thinking everyone's antifa.  
17   Because there was, like, some -- there were, like, weird reports going out that antifa is  
18   looking to, like, stab one of our guys or something like that, you know? So everyone  
19   suspected anyone around them to be antifa.

20                 And I honestly don't think that the guy who did the stabbing was an antifa guy. I  
21   think he was just a guy that a few of the guys suspected -- not our guys. I mean, I don't  
22   even know where our guys were. Just the guys who were around there -- I mean,  
23   suspected was an antifa guy infiltrating or something. And they confronted him, and the  
24   guy -- it seems to me that he was, I don't know about defending himself, because we  
25   didn't have weapons, but whoever was confronting him, he felt threatened enough to

1 pull out a knife and stab him. I don't think the guy was antifa. I mean, I think he was  
2 just some homeless guy or something.

3 Yeah, that's all I remember.

4 Q How were you identifying antifa or who was antifa and who wasn't?

5 A Well, that's a good question. Typically they're in groups, right? I mean,  
6 they wouldn't walk around alone. But they wear the, like, either all in black or red and  
7 black. They have something called, is it blackout, I think they call it, when they cover  
8 their face completely in black and their whole body, but they will have some red.

9 And they will have -- you know, that's pretty much it, unless they have an  
10 umbrella that says, like, "All Cops are Bastards," or shields. Or some of them have  
11 full-body armor, like, walking around. Like, they will have, like, not, like, bulletproof  
12 armor, but, I mean, they will almost like an umpire, like a catcher, right? They'll have  
13 the mask and the leg pads and all that stuff. So it looks like they're there like some sort  
14 of foot soldier.

15 Q Okay.

16 I forgot to ask you for the 14th and then also for the 12th, other than just the  
17 protective gear you mentioned, like the vest, the tactical vest, and the helmet, for  
18 December 12th, did you have anything else, like a weapon, like a bat or any kind of  
19 defensive weapon or anything like that?

20 A No.

21 Q Okay.

22 A So we were told not to even put plates in our carriers because that could be  
23 deemed as illegal if, like, you get in a fight. So anything that the cops could use to arrest  
24 you they would. So we had, you know, like, nothing like that. Yeah.

25 Q And do you recall who told you that?

1           A     Well, they were -- I mean, I even made a video giving tips. I mean, as an  
2     Army guy, I said -- because some guys -- because no one wanted to get stabbed, right?  
3     So, instead of having an actual plate that stops bullets, they would put, like, a cutting  
4     board or something. So I think I made a video about paper, to put paper in there, and  
5     it'll stop bullets too.

6           So everyone was giving tips. Everyone plays the lawyer. Like, in the Army, they  
7     call it, like, a barracks lawyer. Like, everyone chimes in on, don't do this, be careful with  
8     that. I don't remember who said what.

9           Q     Okay.

10          Let's move back -- I take it, for the 12th, you just flew back also by yourself?

11          A     Yeah, correct.

12          Q     Let's move on to the 6th, but, [REDACTED] did you have some questions?

13          [REDACTED]     Thank you, [REDACTED] I just had a few questions on the 12th.

14          BY [REDACTED]

15          Q     Did you have any interaction with the Jericho March event that was  
16     occurring on that day?

17          A     I don't -- I've never heard of the Jericho March.

18          Q     Okay. It was a rally that had been organized that had a lot of Christian  
19     imagery. Alex Jones and Stewart Rhodes were speaking there.

20          A     On January 6th?

21          Q     No. This is December 12th.

22          A     No. No. I know that we saw his guy there at nighttime, because they  
23     were staying at a hotel, like, in -- they had some sort of rally there. I think on the 12th,  
24     also, Alex Jones showed up, like, in a tank or something. But besides that -- I think that  
25     was the 12th, right, that he showed up in a tank? Like, it was a march, yeah. But I

1 have no -- I don't know what the Jericho March is or anything.

2 Q That's all.

3 I guess I'd be curious to ask, what do you mean by a "tank"?

4 A He had a tank. You know, like, Alex Jones was in a tank.

5 There was a lot of people, I think, for -- Donald Trump came out on the December  
6 rally, and many people didn't see him, but he was in his limo, like, the Beast or whatever  
7 he called it, and he passed right in front of the Willard, and everybody ran out to go see  
8 him, but he stayed in his car.

9 So, yeah, there was a tank -- I didn't see the Alex Jones tank. I saw it in pictures.

10 But just type in "Alex Jones, tank, Trump rally." It's not a tank with, like, tank treads.

11 It's one of those tanks with, I think, maybe three wheels on it or something, and he was at  
12 the hatch.

13 Q To be clear, you never saw this vehicle in Washington?

14 A Correct. I saw it in pictures. No, but I'm pretty sure -- here, look. Just  
15 type in "Alex Jones, Washington" --

16 [REDACTED] I think that might've been the November 18th rally in Atlanta that I  
17 had asked you about.

18 The Witness. Hold on.

19 Here, look. No. "Alex Jones in the streets of D.C." It's a -- is that a tank or -- I  
20 mean, it could be -- all right. I mean, it could be, like, a very souped-up truck that looks  
21 like a tank.

22 [REDACTED] Sure. Well, as long as you didn't see it in D.C. in person. That's the  
23 relevance.

24 The Witness. No, no. Right. No. No, right, in person I didn't see it.

25 [REDACTED] Okay. I'll turn it back over to [REDACTED]

1 BY [REDACTED]

2 Q I had asked some of these questions about December 14th, but I'm going to  
3 re-ask them about December 12th.

4 I know you provided security for Ms. Gracia and Latinos for Trump. Did you  
5 coordinate with any other groups at that time, any other security groups that you know  
6 of?

7 A No. No.

8 Q And then --

9 A So this time, well, they didn't give us any pins. I mean, I wasn't there long  
10 enough at the second meeting, like, to know, like, if they eventually received pins, you  
11 know? But, like, during half of the rally, I broke off and I just started, you know,  
12 interviewing people. So, I mean, I wasn't too --

13 Q Okay.

14 A Well, also, the second rally wasn't so well attended. I mean, there wasn't  
15 too many people there.

16 Q Okay. And then how would you compare the attendance between the  
17 November and December rallies?

18 A Probably 50 percent. I mean, like, 50 percent less.

19 Q Okay.

20 And then how about within the Proud Boys, did you hear at that time about any  
21 coordination of where you were going to be or, like, creating a perimeter or a box around  
22 certain areas to protect them?

23 A No. December was a little different from November, because in November  
24 we got caught off guard. That means we were all -- like, most people left, and we were  
25 at the Phoenix hanging out. And then we heard about the attacks of antifa, and then we

1       grabbed as many people as possible and we headed out.

2             December 12th, we all rallied at Harry's, because we figured this was going to  
3       happen anyways, it's better to be ready.

4             So that's the difference, that the plan was, after the march, to just be in a place,  
5       because, regardless, we're going to be outnumbered, any confrontation we're in, you  
6       know, so it's safer for us to have more guys. So people were rallying -- I mean, they  
7       were hanging out in front of Harry's, you know, to wait till something actually happened.

8             Q     And then did you meet -- maybe not coordinating for security, but do you  
9       recall meeting any Oath Keepers for the December 12th rally?

10          A     Never.

11             The first time I ever heard of Oath Keepers was in January, I mean -- and that's  
12       because they had patches and stuff like that. Yeah. I mean, they had, like, rucksacks  
13       and stuff like that, which was not the -- it wasn't the same feel. It wasn't the -- because I  
14       think -- perhaps it was a little more hopeful in December, because I think in December we  
15       were there because that was the day the Supreme Court decided whether they were  
16       going to take the case or not.

17             So I remember rallying -- I mean, I think, unless that was November -- now I'm  
18       getting confused. But I remember going and -- I mean, I saw Sebastian Gorka speak in  
19       front of the Supreme Court. I think that was it.

20             Well, January 6th was -- I think that was the day they were going to ratify the vote.  
21       So it's a different -- and, also, January 6th, we didn't have a huge turnout either,  
22       compared to the others.

23             Q     So would you say that the focus for the November and the December rallies,  
24       given, kind of, where the marches went and what you remember, was the Supreme Court  
25       and then for January 6th it was the Capitol?

1           A    Right. Right. There was the march in December that ended in the  
2       Supreme Court.

3           Q    Right.

4           A    That's where the speeches were done.

5           January 6th was a little different, because, yes, it was at the Capitol, because  
6       that's where Trump was going to give a speech, and everyone wanted to be in front of  
7       that. I mean, I was actually doing security for some doctors that were speaking on some  
8       podiums, but I saw the speech on one of those big boards, those electronic TV things.

9       But, yeah, yeah.

10          Q    Okay.

11           [REDACTED] Great. I think we're going to move to talk about the 6th, but we're  
12       going to take a 5-minute recess. So let's go off the record at 11:30, and then we'll come  
13       back at -- or, sorry, 1:30, and we'll come back at 1:35.

14       The Witness. Okay.

15       [Recess.]

16           [REDACTED] So we're back on the record at 1:35.

17           BY [REDACTED]

18          Q    Okay. You said you remembered somebody's name?

19          A    Right. So that guy who was in the picture in the plane, I think they call him  
20       Greek. Greek is what they call him. Yeah.

21          Q    The guy who -- sorry. Which one was this?

22          A    Like, with the yellow scarf that I couldn't identify.

23          Q    Yeah. The Greek. Okay.

24          A    Yeah. So him -- I mean, I remember him from, like, from the rallies,  
25       showing up there and helping alongside security. Yeah, no, because -- well, I mean, now

1       that we're going into January 6th -- I think on the 5th -- not on the 5th -- in November, he  
2       was also there helping Al out. Yeah.

3           Q     Okay. We'll come back to the Greek, then, in a second.

4           A     Uh-huh.

5           Q     Let's talk about, kind of, leading up to the 6th. When did you learn that  
6       January the 6th was going to be an event or was going to be important?

7           A     It was very short notice. I mean, I remember it being, like, maybe, like,  
8       5 days before. Yeah. I mean, if they planned it for a while, I only heard about it, like,  
9       maybe 5 days before.

10          Q     Okay.

11           Do you remember, there was a tweet on December 19th -- I can pull it up and  
12       show it to you -- by President Trump calling attention to January 6th? The quote that  
13       folks remember is he says, "Be there, will be wild!" Do you remember that tweet at all?  
14       That was on December 19th.

15          A     I don't remember the tweet, but I remember Donald Trump telling people to  
16       be there, I mean, to support, yeah.

17          Q     Okay.

18           Do you remember, did you start planning with other Proud Boys about going up to  
19       D.C. for the 6th around then? Or what happened when you learned about the 6th?

20          A     I mean, I wasn't planning with any Proud Boys. I was -- you know, I was  
21       adamant that, if I go this time, they're going to pay for my trip, right? "They" meaning, if  
22       I'm doing security, that this time -- I think that's one reason I didn't do security so much in  
23       December, because I felt like, you know, I mean, I'm just following these people around  
24       and I have to pay for my own ticket here.

25           So, yeah. So it seems that in November, like, I wasn't reimbursed. But in

1       January -- like, for January I was. Because --

2           Q    Okay.

3           A    Yeah. I don't think I would've gone otherwise.

4           Q    And you said it was Latinos for Trump or Bianca Gracia that reimbursed you?

5           A    Correct.

6           Q    Okay.

7           You mentioned that for January 6th -- that's where you first met or first learned of  
8       the Oath Keepers. Is that right?

9           A    Correct.

10          Q    Okay. And how did you learn of them? Was it before the 6th or just on  
11       the 6th by seeing them?

12          A    It was early in the morning, because we started off early. Like, the  
13       rallies -- there were these podiums all over the place, these stages.

14          So, outside of the Phoenix, everyone was rallying -- I mean, all the guys that were  
15       out doing stuff -- I don't know if they were just doing security and this and that, but they  
16       were -- I mean, I was there. There was a bunch of those guys outside of the Phoenix  
17       wearing, like, stuff that says the "Oath Keepers," and that's how I knew about them.

18          And I'm like, who -- I mean, I think I asked them, are you guys Proud Boys? And  
19       they're like, no, we're Oath Keepers. And I'm like, all right. I mean, I'd never even  
20       heard of them. Yeah.

21          Q    Okay. And when you met them there outside the Hotel Phoenix, they just  
22       happened to be there? Or were you doing something with them?

23          A    No, we weren't doing anything with them, but people were getting ready to  
24       go do their thing. I mean, I don't know what people were doing, just, like -- because I  
25       was doing security, I'm not sure what other events were going on there. I know there

1        were a bunch of different stages where people, you know, were giving speeches. I was  
2        at one that was specifically doctors. But I'm not sure, I mean, what they were doing.

3            Q      Were there any particular -- of the Oath Keepers that you met outside of the  
4        Hotel Phoenix, anybody that you remember specifically meeting? Like, any names or  
5        anything?

6            A      No. No. It seems like they were -- they weren't very -- they were very  
7        professional. I mean, it seems like these guys are right out of the military, that they  
8        wouldn't just talk to anybody. It seems like they would talk to their own guys, and if  
9        anyone starts asking questions, that they were -- because I wasn't wearing any Proud  
10       Boys gear or anything. I mean, no one was. So then we got stuck asking people a lot,  
11       "Are you a Proud Boy? Are you a Proud Boy?"

12           So, you know, when I saw them -- I mean, I saw people and I said, "Are you  
13       guys" -- because sometimes -- well, like, virtually always, every chapter has a nickname  
14       for the chapter, you know? And then they're like, "No, we're Oath Keepers," whatever.  
15       And then -- that's it. And there was another guy who came up and said, "Okay, we're  
16       moving out," you know, like, for that group.

17           So that's all I know about that. Yeah.

18           Q      Okay.

19           You mention that you weren't wearing Proud Boys gear or colors --

20           A      That's right.

21           Q      -- for the 6th. Can you just tell me about that?

22           A      Yeah. No, it's -- it was a request that was put in by the local D.C. chapter.  
23       And it didn't really make much sense to me, because we were attacked in the past by  
24       antifa, and I thought, well, this is terrible, you know? I mean, if we get attacked again,  
25       we're not going to know who's who. So I was against us not wearing colors, but, I mean,

1 like, I didn't call the shots. So they made it official that you couldn't wear colors. Yeah.  
2 And that's it. Yeah.

3 Q And just if you could elaborate a little bit on why you couldn't wear colors or  
4 what the purpose of that was.

5 A I don't know. I mean, it didn't really make much sense to me. This is why  
6 I objected. Because I'm like, this is completely -- you know, I understand this is what the  
7 local chapter wanted, but it didn't seem that it would benefit us in the long run, especially  
8 in a fight. Like, we don't know who's on whose side. But I don't know why they chose  
9 not to wear colors.

10 Q Okay.

11 I can pull them up and we can look at them, but there were some messages from  
12 Enrique Tarrio -- actually, let me ask this question first. Did you have Parler? Did you  
13 have a Parler account?

14 A I did, but I didn't have any subscribers that I know of. I mean, I may  
15 have -- I mean, it might still be there, because I never closed it.

16 Q Did you follow Mr. Tarrio on Parler?

17 A No. No.

18 Q Well, I'll just represent to you that, in advance of January 6th, on  
19 December 29th, Mr. Tarrio posted on Parler about Proud Boys showing up in D.C. but  
20 wearing all black, and indicated that the intention there was to look like antifa. Did you  
21 ever hear anything about that?

22 A I heard something like that, but I think it was a joke. I mean, he mentioned  
23 it not seriously. I mean, sometimes, like, he would post things -- but that wasn't the  
24 reason. I mean, that wasn't a -- I mean, first of all, antifa doesn't really come out in the  
25 daytime, okay? And if they are, I mean, it's just like, I mean, some girls, like, behind a

1 fence, protected by police. So that couldn't have been the reason.

2 Yeah. I mean, antifa would not be in broad daylight in a Trump rally. You  
3 know, I mean, they do it at nighttime, you know, when there's hardly any people. So  
4 that -- yeah. I mean, that couldn't have been an accurate reason.

5 Q Can we pull up exhibit 7?

6 So this is a video -- and I think you'll recognize the individual in this video -- taken  
7 on the night of the 6th. And let's pull it up, and we'll watch it quickly, and I'll just ask  
8 you some questions about it.

9 You also might need to turn up the volume. A lot of times it's kind of low. So  
10 let's make sure we've turned up our volume, and then tell me if you can't hear it.

11 But let's go ahead and play that.

12 [Video played.]

13 BY [REDACTED]

14 Q I think we can pause it now.

15 A Uh-huh.

16 Q Is that -- that's Gilbert Fontacoba?

17 A Correct.

18 Q Okay.

19 And I mostly show that -- so, in the video, it sounds like Gilbert's watching the  
20 coverage. I'll tell you, Enrique is out of the screen, and you could hear him if the volume  
21 was a little bit better, but he expresses agreement with Gilbert, saying he did a good job,  
22 basically.

23 And I show you that mostly just to kind of figure out what of the planning or the  
24 coordination you might've been in on or, like, had knowledge of.

25 And it sounds like -- and tell me if you disagree -- that Gilbert, at least there, is

1 indicating that somebody was trying to look like antifa and they did a good job at doing it.

2 And I think he's talking about Rufio --

3 A Yeah.

4 Q -- or Ethan Nordean. But you had never heard anybody tell you --

5 A No, no. But I've heard it mentioned, you know, but I thought it was a joke.

6 Now, in terms of what they ultimately agreed upon, I was kicked out of this group  
7 very early on, in terms of that Ministry of Self-Defense thing, which are the only ones that  
8 had any type of -- I mean, any type of trend or thing that we're gonna do or not gonna do  
9 came through that thing, you know.

10 So the last thing I posted -- I mean, I think I made a video on there saying how not  
11 colors is not a good idea, you know. And then I said, whose idea was this? And they  
12 told me that it was the head -- that it was the head of the local chapter, that it was the  
13 D.C. chapter, and that there's a, like -- with rallies, the rules they have is that we listen to  
14 what their local chapter, wherever the rally happens to be; we do what they tell us.  
15 And, yeah, that's all I was told.

16 In terms of looking like antifa, I never -- you know. Now, I said before, it didn't  
17 make any sense -- like, it wouldn't make any sense -- again, not knowing what was going  
18 to occur, it wouldn't make any sense to you. Because when I heard "looking like antifa,"  
19 before -- I mean, like, before what actually happened in the Capitol, it makes you think,  
20 well, the reason you want to look like antifa is to infiltrate antifa to fight antifa. Because  
21 that's what we did in December and November, that we went there to fight antifa. So,  
22 in terms of looking like antifa in the daytime, I don't know what's the rationale behind  
23 that. Yeah.

24 Q And so were you -- I think, did I pick up that you were starting to maybe  
25 opine that the reason that -- nobody would try to look like antifa during the day, because

1       they don't normally show up during the day.

2           A     Right.

3           Q     And not knowing what was going to unfold at the Capitol, that didn't make  
4     any sense. But now that you're looking back on it, you think maybe part of the intention  
5     was to look like antifa was the one that was attacking the Capitol?

6           A     I could see how that could be used, I mean, to paint that narrative. I mean,  
7     I could definitely see how that could be used.

8           But knowing these guys -- first of all, like, I know most of the guys who went in, I  
9     mean, just the guys who went to jail and this and that. And these guys, for sure, had  
10    no -- they had no foreknowledge of any insurrection occurring. It's just, it's not -- these  
11    guys are not organized. It's not, like -- yeah. And they couldn't have organized it.

12          I mean, one, I don't believe it was organized. I mean, I believe it just happened,  
13    right? And they just found themselves there, so they went inside. The truth is, I  
14    probably would've went inside the Capitol also if I was -- if it was accessible to me.  
15    Because I was at a side where the door wasn't penetrated, you know?

16          No one would've thought that it was going to get spun like it did, like some sort of  
17    insurrection. So it's hard for me to believe that these guys, these guys -- especially  
18    Gilbert, he's not known for being, you know, the brightest guy in the world -- knew that  
19    they were going to storm the Capitol or anything like that. It's hard to believe. Yeah.

20          Q     Okay.

21          I wanted to ask a little bit about those MOSD chats. So I know you were early on  
22    kicked out of them, but let's try to build out that timeline a little bit, like, when you were  
23    added and when you got kicked out.

24          A     Okay.

25          Q     So when do you remember first hearing about MOSD or getting added to

1       that chat?

2           A     I think it was a week before, around a week before. I don't remember  
3     exactly.

4           Q     Okay. And what do you recall reading when you were first added?

5           A     First, I didn't understand what it was for, right? As a matter of fact, I didn't  
6     know what "MOSD" meant until recently. I'm like, "Yeah, Ministry of Self-Defense."  
7     You know, so, I mean, it makes sense to me now that the reason they created this was  
8     because I think -- it wasn't just one -- I think two of our guys got stabbed the previous  
9     time, and this is a way to organize that.

10          So they got the most -- you know, like, the guys who are reliable, the guys who,  
11     you know, actually show up and stuff like that, and they put them in one group. So this  
12     would've been the group of responsible guys.

13          And there was nothing -- well, I think there was, yeah, where the talk of the no  
14     colors came out. And then -- but they used it like a public chatroom, you know, so they  
15     would post stupid crap, whatever stupid crap, from, you know, just pictures of women to,  
16     like, some idiots would post racist thoughts, this and that. And I've always stayed out of  
17     the chats. I mean, I'll chat if I have to, if there's something I have to say.

18          And then, you know -- but when they posted something enough times that  
19     bothered me, I commented. And the other guys didn't know who I was. I mean, you  
20     know, they probably still don't. But they're like, "Who's this guy?" You know, I mean,  
21     "They should fit in or F off," you know.

22          So, whatever. I mean, I'm not going to let people tell me, you know, what to  
23     think. I mean, I joined this organization because I'm not a racist. So, yeah, I had a  
24     falling-out with some of the guys. Yeah.

25          Q     You know, I know that you saw the anti-Semitic and racist commentary. Is

1       that what you're saying bothered you --

2           A    Yeah, correct. Uh-huh.

3           Q    -- about the chats? Okay.

4           A    Yeah. Well, mainly because it's a national chat. It's not Florida guys.  
5       Because Florida guys, you know, we don't -- like I said, we're typically minorities also.  
6       But it was the exposure to the national scene, these little, you know, like, "the South will  
7       rise again" type of guys in the middle of nowhere. You know, those guys are a  
8       little -- they're not as sophisticated as people who are either minorities themselves or are  
9       exposed to minorities. Yeah.

10          Q    Okay.

11           You mentioned a specific -- well, actually, let me ask you this first. Have you read  
12       the indictment that Enrique Tarrio was included on recently?

13          A    I read through it. I mean, I can't tell you everything, but I -- yeah. That  
14       reporter sent it to me.

15          Q    Okay. I just want to ask, because you used a particular phrase. I think  
16       you said "fit in or fuck off."

17          A    Uh-huh.

18          Q    Do you remember reading that in the chat?

19          A    Yes. Yes.

20          Q    Okay. And what was that about?

21          A    Well, that's a phrase that has existed in the Proud Boys for a while, right?  
22       Because there's one that's similar that's, like -- was it "FAFO," like, "F around and find  
23       out," right? So this is, like, "FIFA" or something like that -- or "FIFO." I don't know.

24          Yeah. Yeah. I mean, I've had that phrase tossed towards me. I've been -- I  
25       don't function like most Proud Boys. I mean, I try to do different things. I'm trying to

1       institute prayer in our meetings and everything like this. You know, so most guys don't  
2       like me as a Proud Boy, because, I mean, they think that I'm trying to rock the boat. So  
3       they've used that against me, like, you know, "fit in or F off," you know, but, like, my goal  
4       is to really articulate the values that most Proud Boys actually have, you know, that these  
5       big-mouths are in some way drowning out.

6           So, yeah. Well, they've used that phrase against me before.

7           Q     Okay.

8           Do you recall a meeting, like, a GoTo meeting or a video meeting, being  
9       announced on the MOSD chat in advance of the 6th, like, a planning meeting?

10          A     Wait a minute. Wait a minute.

11           There was one meeting that I was actually a part of, but I don't remember if it was  
12       January -- it may have been December. I mean, it was either -- I don't know. But there  
13       was a meeting that for sure -- a Zoom meeting that I was a part of, "a part of" meaning  
14       that I attended.

15           And it was only people within this chatroom that -- you know, but it was also a  
16       chatroom for December -- you know, for all these events, there was a chatroom created  
17       for, you know, people to communicate with each other, you know, like, where are you at,  
18       what hotel are you in, whatever. So they may have had meetings for that as well.

19           But for sure there was a meeting that I attended, but -- everyone in that group  
20       attended, but I can't remember if it was for the 6th or for December.

21           Q     Let's look -- can we pull up exhibit 3?

22           So this is the indictment, which includes Mr. Tarrio and then also some others, like  
23       Ethan Nordean, Biggs, Rehl, Donohoe, and Pezzola.

24          A     Uh-huh.

25          Q     And let's go to paragraph 38. So you might have read this already, but I'll

1 give you second just to -- can you see that?

2 A Yeah.

3 Q Okay. I'll give you a second to read that. Just tell me when you're done.

4 A Okay.

5 Hmm. I don't think that's the meeting. I don't -- because I remember the  
6 whole time I felt -- like, the whole colors thing never made sense to me. And if they had  
7 a meeting to explain, you know, more on it -- I mean -- I don't recall. I mean, for sure I  
8 was a member of some virtual meeting before an event, but I don't know if it was  
9 December or if it was January.

10 Q Okay. In the MOSD chat, do you remember somebody like Mr. Tarrio  
11 announcing a virtual meeting?

12 A Not when I was there. I mean, if he announced it, then that's the one I  
13 went to. But apart from that, I don't -- yeah, I don't --

14 Q So this paragraph, the part that I wanted to draw your attention to,  
15 paragraph 38, it says: "On December 29, TARRIO posted a message to the MOSD  
16 Prospect Group to notify prospective members of a virtual meeting on December 30 to  
17 explain 'how this all works.'"

18 Do you think that's the meeting?

19 A I mean, I could tell you -- like, if you would happen to have a screenshot of  
20 this meeting, all right, there -- I was one of the guys who came out, for some reason, with  
21 their camera on the meeting, I think, as I was looking at the meeting, and there was, like,  
22 a motorcycle behind me.

23 That's the one I was at. So, like, if that's the one for, you know, this event,  
24 then -- you know, when you're talking about a 2-week period, I mean, I don't know about  
25 which one exactly this is referring to, but --

1           Q     Do you recall anything specific about the meeting or, like, what was  
2     discussed?

3           A     I don't remember. Well --

4           Q     Was it a long --

5           A     The thing is -- no, it was, like, a 30-minute meeting.

6                 But, I mean, the thing was, the colors thing wasn't even -- I mean, it probably  
7     wasn't even -- you know, I think the meeting was to explain what MOSD was, like, not the  
8     name, but why they gathered everybody together. But the colors thing made no sense  
9     to me in the beginning, yeah, but it wasn't something on my mind, because I'm like,  
10    "Okay, we don't wear colors. What else?" I mean, it's not something to have a whole  
11    meeting for.

12                 So I believe, I think the -- okay. Now I'm remembering. The meeting was how  
13    people would gather in terms of -- because you weren't wearing colors, they were  
14    expected to be in groups of four, all right? And you had to pick your four guys, or  
15    something like that, from the whatever group, and that's the guy you're with no matter  
16    what, like, during the whole thing, so you don't get lost and you don't get ambushed by  
17    antifa or something. That's what I heard.

18                 And the colors thing, it wasn't all black. It was -- that was one suggestion.  
19    There was another one that said that we should dress like Trump supporters with, like,  
20    MAGA hats and stuff like that.

21                 But, regardless, all I heard is, like, we're not wearing colors. That doesn't make  
22    any sense. But it wasn't, like, what, I mean, stood out in my mind. I mean, what stood  
23    out in my mind was the safety of everybody there. Which didn't really so much affect  
24    me because I was doing security instead of actually just, you know, walking around.

25                 So I'm pretty sure that's what it was. Yeah.

1           Q     Okay. So you said you remember talking about dividing up into groups of  
2     four. Any other, kind of, directives in the meeting or anything else you remember?

3           A     That's all. Because it was too early. I mean, it was before -- I got probably  
4     kicked out a day after this, maybe a day or two. Because if this was December 30th,  
5     then I must've been out by, like, the 2nd or the 3rd. I mean, for sure, anything  
6     specifically having to do with the event or that had to do with what they would do on that  
7     day, I mean, I wasn't privy on.

8           Q     Do you remember any discussions about needing to walk in a group or  
9     march together --

10          A     No, that --

11          Q     -- or how you should be in a line?

12          A     No, no, no. So that's the opposite of what they were doing. They were  
13     saying groups of four, but not anything -- like, not one group of people, you know,  
14     marching or anything like that. It was just groups of four. And wherever they go, you  
15     go. Like, not in terms of going into the thing, but one example they gave is, if he pisses,  
16     you go with him, you know?

17           But the understanding was not to allow anyone to get stabbed or anything. It  
18     was more security for us. It didn't seem like it was an offensive decision or offensive  
19     planning.

20          Q     Do you remember in the chat that you were a part of, the MOSD chat, who  
21     was leading those discussions? Or was there anybody that was leading the chat?

22          A     There were admins in the chat. So, like, Enrique was an admin. I was  
23     kicked out by, I think, somebody named Blackbeard, all right?

24          Q     Okay.

25          A     Because he's the one that -- I mean, he actually had messaged me privately

1 and threatened me or something like that. So, yeah, I think he's the guy who kicked me  
2 out. And --

3 Q What did Blackbeard say to you when he messaged you privately?

4 A He called me a faggot. And then he said, oh, like, you want to mess with  
5 me, or something like that. But he wasn't going. He wasn't going, because he just had  
6 surgery or something. But I never -- I mean, that I know of, I don't think I ever met him.  
7 I mean, he lives in some other State. But I heard he's a big fat guy.

8 Q Anybody else that you recall?

9 So, like, actually, let me -- let's pull up exhibit 12.

10 So this, again, is just that message that ended up getting forwarded and  
11 distributed on the Proud Goys chat.

12 A Uh-huh.

13 Q And it looks like, in the message, you were basically complaining that -- you  
14 specifically mentioned Blackbeard, and then also you mentioned Joe Biggs. And you  
15 were saying that they kind of -- they were tolerating this racist and anti-Semitic  
16 messaging on the chat.

17 So was Biggs another one of the, kind of, leaders or moderators on the chat?

18 A Yeah.

19 Q Okay.

20 A Yeah.

21 Q If I give you a couple other names, can you tell me if you recall if they played  
22 a, kind of, leadership role in the chat?

23 A Nobody gives their real name, with the exception of Joe Biggs -- first of all, I  
24 didn't know that was his real name. It just sounds made up. All right? So if it's  
25 handles, then maybe I could, you know, confirm, you know. But most people, besides

1       Enrique and myself -- I mean, Ash, that's my legal name in Israel -- it's -- but they don't  
2       give their real name.

3           But go ahead.

4           Q     I did also want to ask here, in this context, when you said, "we need to sharia  
5       leadership," what did you mean there?

6           A     So it's in our bylaws that sharia means to -- it's our court procedure on how  
7       we deal with internal problems. I mean, it's basically an internal court hearing but for  
8       the Proud Boys, where there's a moderator and then they provide the case. So this is  
9       called to sharia someone.

10          Q     Okay.

11           We can take down this exhibit. Let's pull back up exhibit 3. I just want to point  
12       out a couple more things in the indictment for you and talk to you about them.

13           So you noted -- you said that Proud Boys aren't normally organized and, certainly,  
14       in comparison to the Oath Keepers, were less organized, and that the, sort of,  
15       pre-planning that's being alleged the Proud Boys engaged in is just not typical of what the  
16       Proud Boys do. Is that right?

17          A     Well, it's evolving. The Proud Boys -- like, going to rallies and fighting antifa  
18       is not typical -- we do anyways -- as a national organization. I mean, that type of fighting  
19       is done more on the local level.

20           So I think their goal was to arrange themselves, to protect themselves in the  
21       future, so people wouldn't get stabbed and everyone would come home alive. So it was  
22       essentially reactionary. It wasn't -- yeah. It seems to have been a defensive measure  
23       here.

24          Q     Okay.

25           I just wanted to ask about getting more -- I mean, when you read the MOSD chats,

1       were people sending messages about being more organized this time or having it be a  
2       different sort of event or --

3           A     No. Be more organized. I mean, be -- like I said, nobody thought that  
4       what happened was going to happen, all right? So if they would've been talking like  
5       that, it would've been hard to see it, because, I mean, they wouldn't think of that. I  
6       mean, they -- yeah. I mean, people were just talking about being more organized and,  
7       you know, things they could do or, you know, things that happened or that they did  
8       wrong before that ended up -- that got someone or a few guys get stabbed.

9           Yeah, that's all I remember, I mean, from the serious stuff. There was a lot of  
10      silly stuff.

11          Q     Okay.

12          And then -- so you said that you think you were kicked out of the chat a day or two  
13       after the meeting on the 30th, so, like, January 1st or so. Can you recall, in relation to  
14       when Mr. Tarrio was arrested on January 4th, do you know that you were kicked out  
15       before that?

16          A     Oh, before. Yeah.

17          Q     Okay. Okay.

18          So we can go to the particular part of the indictment, but just to save time, I'll just  
19       represent to you that the indictment discusses the fact that there was a first MOSD  
20       prospectives chat, and then, when Mr. Tarrio got arrested, there was a risk that that chat  
21       became compromised, and so it was nuked or --

22          A     Right.

23          Q     -- that chat was destroyed or deleted, and then a new one was created.

24          Were you added to the new chat?

25          A     No.

1           Q    Okay. So you were only part of one MOSD chat?

2           A    Yeah.

3           Q    And then, for the 6th itself, the indictment also mentioned another chat  
4         called "Boots on the Ground." Were you part of that chat?

5           A    Hmm. I don't -- I don't know. I mean, I -- I mean, it sounds like I would  
6         have been, because it would be hard to go there without communicating with people on  
7         the ground. I may have been added to it. I mean, yeah.

8           Yeah, you have to understand, there's a lot of people who went to D.C. that were  
9         not part of this MOSD chat. The MOSD chat were going to be the organizers or, I guess,  
10       the responsible people in the bunch, but there was a lot of other Proud Boys who went  
11       not being part of that group. So then that "Boots on the Ground" must have been just  
12       the bulk of just everybody, you know, like -- I mean, not just -- yeah.

13          Q    Okay.

14          Let's go to -- this is the 2nd -- or, sorry, this is an MOSD chat on January 3rd. At  
15         this point, it looks like you were -- or it sounds like you were kicked out of the chat.  
16         Let's go to paragraph 48 and look at that.

17          And so I can read it out loud, but you can also read it at the same time. But just  
18         for the record, paragraph 48 of the indictment says, "On January 3, 2021, members of the  
19         MOSD exchanged messages in the MOSD Members Group various statements about  
20         attacking the Capitol. In response to the question, 'what would they do [if] 1 million  
21         patriots stormed and took the capital building. Shoot into crowd? I think not,'  
22         PERSON-3 stated, 'They would do nothing because they can do nothing.'"

23          It sounds like you did not see or you were not part of the chat when that sort of  
24         conversation was going on, right?

25          A    Right. I mean, for sure not.

1           Q     Does it -- I mean, now, seeing that those were some of the later messages  
2     exchanged in that chat, does that surprise you?

3           A     No, it doesn't surprise me. I mean, it doesn't surprise me. I mean, not  
4     that I think that there was some sort of effort to take over the Capitol, but just if -- like, if  
5     what occurred ended up occurring, I mean, they're just kind of throwing out scenarios.  
6     Yeah.

7                 But that's basically what they do in this chat, right? If they're not just kind of  
8     screwing around, they're either just talking about scenarios or, you know, I mean, just  
9     telling their political opinions or, like, hating on some politician or something. Yeah.

10          Q     Right. I mean, I guess, the point being, though, that's what was discussed,  
11     and then that did, in fact, happen, right?

12          A     Right. Yeah.

13          Q     Did you have any other conversations outside of the chat context or hear  
14     from any other Proud Boys anything like this, talk of --

15          A     Well, there was a rule within the chat in the beginning that no one should  
16     post anything -- that anyone caught sharing any messages that was put in the chat would  
17     be, I don't know, like, sharia'ed or something like that.

18                 You know, so no one talked -- you know, these guys felt that they were the inner  
19     circle and they were trusted, you know, so no one shared information, you know? So  
20     even, like, Proud Boys that I know, I mean, that know that I got kicked out, wouldn't tell  
21     me anything after I got kicked out, so --

22          Q     Okay.

23                 And then let's scroll up to paragraph 41. And this is before -- this is earlier, but I  
24     wanted to ask you about one of the things mentioned in this paragraph.

25                 So paragraph 41 specifically discusses, on December 30th and 31st -- this is outside

1 of the MOSD chat, but -- Mr. Tarrio communicating with an individual who's not named in  
2 the indictment, but this individual sends Mr. Tarrio a nine-page document titled "1776  
3 Returns."

4 A Uh-huh.

5 Q Does that ring any bells? Did you hear anything about the document called  
6 "1776 Returns"?

7 A He sent it to him personally? Or --

8 Q The individual mentioned in this sent the document to Mr. Tarrio.

9 A Oh, if it's personally, I mean, I wouldn't have seen it. I mean, he's a very  
10 secretive person. Like, I was never really, like, you know, on a hanging-out level with the  
11 guy to know anything personal he would've received.

12 Q I guess my question is just, did you hear anybody discussing a document --

13 A Oh, no. No, no.

14 Q -- like that, or, you know, was it sent out later or anything else?

15 A No. No, not that I -- I mean, the term "1776" gets thrown around a lot.  
16 So, I mean, I don't -- I never heard of anything like that.

17 Q Okay.

18 And then you can pull -- let's pull this exhibit down.

19 And I wanted to just return to that idea of the organization of the group. I know  
20 we had talked about splitting up into groups of four. But Mr. Tarrio discussed at  
21 different points the importance of marching in a group or marching in a line. Do you  
22 ever remember him talking about that on any of these platforms?

23 A I think that the reason for the rally was that they were going to march up to  
24 the Capitol, because that's where the speech -- that's where the speech was going to be.  
25 Yeah, just how the previous event was a march to the Supreme Court. I don't know

1 anyone knew exactly how it was going to be laid out, but that's why. Yeah. I  
2 mean -- yeah.

3 Q Let's pull up exhibit 9. This is another video of the same night, the night of  
4 January 6th, after the attack on the Capitol.

5 I'll wait for the video.

6 [Video played.]

7 The Witness. Okay. So I think I know what he's referring to.

8 The previous meeting in December was a meeting that the Proud Boys, all they did  
9 was march, right? They marched around, I'm not sure, like, that D.C. area. But they  
10 were very scattered, right? They weren't -- you know, like, half the group was here, half  
11 the group was there. And they got a lot of good footage from the news and everything  
12 when they were marching in line.

13 And he may have told them, you know, like, clean it up, keep it tight or something,  
14 you know, like, as you're marching. I mean, that's what I think, you know.

15 BY [REDACTED]

16 Q Okay. You don't recall the meeting that he's talking about where he  
17 stressed marching for, I think he said --

18 A No.

19 Q -- 30 minutes?

20 A No.

1

2 [2:15 p.m.]

3

BY [REDACTED]

4 Q Okay. You don't recall the meeting that he's talking about where he  
5 stressed marching for, I think he said --

6 A No. No, no.

7 Q -- 30 minutes? Okay.

8 Another question just about the MOSD chat. At some point the indictment  
9 mentions eight regional leaders that are appointed. Does that mean anything to you?  
10 Do you remember any regional leaders?

11 A By regional leaders, is that elders? I mean, I'm not sure how, like, it works  
12 on a national level. But there used to be something called elders.

13 Q Yeah, we discussed the elders. I don't think it is. We can look at the  
14 paragraph if you want to. Let's pull up exhibit 3 again, it's the indictment, and look at  
15 paragraph 38.

16 So I'll just read it out for the record. "On December 29th, Tarrio posted a  
17 message to the MOSD Prospect Group" -- let's see. Actually, sorry, we've already read  
18 that part. It's a little bit later in the paragraph.

19 "Tarrio advised that 'upper tier leadership' would consist of a three-person  
20 'Operations' section led by Rehl and PERSON-3 and another person. Tarrio advised that  
21 the 'Marketing' section would be led by Tarrio, Biggs, and Nordean. And then Tarrio  
22 advised that a 'second tier' leadership would consist of eight regional leaders."

23 Do you remember any discussion of that?

24 A No. No.

25 Q The Marketing section and the Operations section, anything like that?

1           A    I mean, for sure -- I don't know what they would mean by marketing. No.

2       No.

3           Q    Okay. We can take that exhibit down.

4           And then in that video that we just watched a second ago, do you know who the  
5       woman was in that video?

6           A    Yes.

7           Q    Okay. Is that Amy Harris?

8           A    Yes.

9           Q    Okay. And how do you know Amy Harris?

10          A    She's always around. She's always taking pictures and stuff like that. And  
11       then I saw some of my pictures -- or pictures of myself online, and I traced it back to her  
12       website, and I'm like, "Oh, that's her, okay."

13          Q    And were you with her at all on the 6th?

14          A    No. No. No. So there they must've been in Baltimore, because Enrique  
15       couldn't be in D.C. on the 6th. So I know that he -- he went to Baltimore -- or for sure he  
16       was out of the city. But, no, like, I don't remember her.

17          Q    Okay. I'll represent to you that Amy Harris -- yeah, you're right, obviously  
18       Enrique Tarrio wasn't there in D.C. for the day of the 6th. Amy Harris was there taking  
19       photographs. But it sounds like you didn't run into her there?

20          A    No.

21          Q    Okay. I'm curious about what your thoughts are on the -- if we can go back  
22       to January 4th when Mr. Tarrio was arrested. Obviously what he ended up being  
23       charged with was related to the burning of that banner, and I know you said that he  
24       wasn't the one that burned the banner.

25          A    Uh-huh.

1           Q     Can you just give me, tell me your thoughts on that situation and why he  
2     took blame for that?

3           A     I don't know why he took the blame for it. I guess he felt it's the honorable  
4     thing to do. I'm not sure -- well, he first -- it seems like there was a post that he took the  
5     blame for even before he was -- he was arrested for it.

6           But he, I guess, didn't deny it afterwards when he got arrested. I felt that he  
7     took, you know, any burden of punishment upon himself. Just, I mean, that's what a  
8     leader tries to do, you know, I guess to get your haters to dislike you less. That's why.

9           Q     And I just want to clarify and confirm, I guess. So for the 12th, you saw the  
10    banner get burned.

11          A     Correct.

12          Q     And you know that Mr. Tarrio was not one of the people that was burning  
13    the banner.

14          A     If I remember correctly, he was not one of the people burning the banner.

15          Q     Okay.

16          A     I mean, there was a lot of people there, mind you.

17          Q     Right.

18          A     There was over 250, 300 people there. And most of them weren't Proud  
19    Boys.

20          Q     And he -- but he was in the area, but just not involved?

21          A     Correct, yeah, yeah.

22          Q     In the area but not one of the people putting lighter fluid on the banner or  
23    lighting it on fire?

24          A     That's correct.

25          Q     Okay. We talked about that you said you didn't bring any, at least for

1       December 12th and November 14th, you didn't bring any weapons with you other than  
2       the -- you had protective gear but not weapons.

3           A     Right.

4           Q     Is that also true for January 6th?

5           A     Oh, correct.

6           Q     Okay. Did you hear about any other Proud Boys bringing weapons, either  
7        guns or any other sort of weapon?

8           A     No. Proud Boys never carry guns on any of these type of, you know,  
9        initiatives. It wouldn't make any sense. It's like, you know, no. No.

10          Q     Did Mr. Tarrio ever carry a gun?

11          A     Never. Never.

12          Q     Okay. So were you surprised to learn that when he was arrested there  
13        were weapons and --

14          A     No. No. But they weren't weapons. They were -- he owns a print shop.  
15        So somebody who ordered magazines, I think they were, for an AR or something with the  
16        Proud Boys logo on them, like, he was going into the area, so he was going to drop them  
17        off personally. But he didn't have a weapon on him.

18          Q     Yeah, sorry, I misspoke. I didn't mean to say weapon. I meant those  
19        extended clip magazines.

20          A     Yeah. I mean, it's extended in D.C., you know. That's a standard  
21        magazine for an AR, like, everywhere else. But, yeah.

22          Q     Was Mr. Tarrio aware of those sorts of laws or regulations normally? Did  
23        you ever hear him talk about those?

24          A     I don't know. I don't know. I mean, that's something that I've heard  
25        brought up, like, you know, like, he should've known better.

1           But, again, he's not a gun guy. I mean, he wasn't in the military, he doesn't own  
2 any weapons that I know of. I mean, is he allowed to own a weapon? I mean, I don't  
3 know, like, he was in jail before. But I mean, he was in jail before he became a Proud  
4 Boy. Maybe that stops him from buying a weapon. I don't know.

5           Q    Okay. And then so on the 6th, you provided security again for the third  
6 event.

7           A    Uh-huh.

8           Q    Who were you providing security for on the 6th?

9           A    Bianca. And this time we were attached to this -- this -- like, speakers  
10 podium all day. And it was doctors, it was a podium of doctors, just speaking out, I  
11 think, on COVID or something like that. So we were there basically the whole day, yeah.

12          Q    And when you say "we," who was with you?

13          A    So I was there with this guy Al, and then the Greek was also there, like, the  
14 Greek guy.

15          Q    Okay. Can we pull up exhibit 18?

16          So that's -- this is -- that's the Greek --

17          A    Right.

18          Q    -- that you're talking about?

19          A    Uh-huh.

20          Q    Okay. And you only knew him by the nickname the Greek?

21          A    Correct.

22          Q    Okay. And do you know who the guy on the right is?

23          A    Not -- I met him there, and he was -- he was, like, well known, everybody  
24 knew him. But, I mean, I didn't know him before that day.

25          Q    Okay. And then do you remember how he was introduced to you, or now

1 do you know who he is?

2 A No, no. I mean, I know he's a Navy guy because we were talking about the  
3 military. Yeah, I remember his name being Josh, and I know that all the girls were  
4 around him. But, you know, I don't know. I mean, he knew the Latinos for Trump  
5 people, for sure.

6 Q Okay. Yeah. I'll represent to you, his name is Josh Macias.

7 Did you hear any connection -- so he's part of a group called Vets for Trump. Do  
8 you remember hearing about that organization?

9 A All right. Yeah, yeah, uh-huh, yeah.

10 Q Okay. And how did this -- how did you meet him, or was he just at the  
11 same event?

12 A Well, this is that speakers podium because I remember the railing, you know,  
13 so he was there with some people, yeah.

14 Q Okay. And so were you providing security for him? Was he one of the  
15 speakers that you were providing --

16 A No. I mean, if he did speak, he -- I mean, he spoke before I got there, but I  
17 don't think he was there speaking that I know of.

18 Q Okay. And then I also noticed that the Greek is wearing what looks like an  
19 Israeli flag also.

20 A Correct. He told me that he was Jewish, like, and I had an extra flag, yeah.

21 Q Okay. So you had given him that?

22 A Uh-huh.

23 Q Okay. And then were there anything like the pins that you mentioned for  
24 the November rally? Were you given anything to signify that you were, like, approved  
25 security?

1           A    No.  No.  It was -- it wasn't that many people, you know, and also we  
2 weren't doing security with anyone else.

3           Q    Okay.

4           A    With any other agency or anything.

5           Q    Any other Proud Boys that you know of that were also providing security?

6           A    Well, this guy named Al.  Remember this short guy.

7           Q    Oh, got it.

8           A    Yeah.

9           Q    Other than the Greek and Al, anybody else?

10          A    Not that I know of.

11          Q    And then I've asked you similar questions for December and November, but  
12 do you remember any other plans to create either, like, a perimeter or a box or protect a  
13 particular geographic area?

14          A    No.  No.  As a matter of fact, we were, like, in our hotel room when we  
15 saw, like, on the news that all this was happening, you know.  And then we went with  
16 this group that wanted to go see it, all right, to walk them over.

17          But in terms of -- after the speech, everything died down and everyone went to  
18 their hotel room, all right, so -- but I knew nothing of anything else happening in between  
19 Trump's speech and by the time I ended up back in the hotel.  So, yeah.

20          Q    Okay.  And then one more time I'll ask you, we discussed Charles Bowman  
21 previously, and I think you said the name rang a bell but you couldn't recall.

22          A    Yeah.  I mean, it rings a bell, not with, like, a ladies -- who's the head of the  
23 Three Percenter?  It's not Charles Bowman, is it?

24          Q    No.  That's -- remind me his name, the Three Percenter guy.

25          A    It was not Stewart Rhodes, right?  Because that's the other guy.

1           Q    Stewart Rhodes is head of the Oath Keepers.

2           A    Oath Keepers, yeah. I mean, it sounds familiar, Bowman, but I mean, I  
3    can't place it.

4           Q    All right. Then let's, why don't you take me through, kind of at a high level,  
5    your day on the 6th. Where did you first go?

6           A    So we woke up early, and then we waited in front of the Phoenix. And  
7    that's where, I mean, I saw these guys for the first time, these Oath Keeper guys.

8           And then we started marching, you know, like, marching with, like, the people we  
9    were guarding, going to this speakers podium. I think we went to one or two of them till  
10   we ended up in one.

11          And then we were just hanging out there all day. It was extremely cold. And,  
12        you know, it was just standing there till after President Trump spoke. I remember  
13        watching the speech on one of the big monitors they had there by where this little  
14        podium was at. And we went back to the hotel.

15          And then I saw that they were watching this thing on TV happening in the Capitol,  
16        this and that, and like -- and they're like, "Oh, let's go, let's go," you know, the girls, I  
17        mean, the Latinos for Trump girls, because Bianca at that time went to sleep, like, in her  
18        room.

19          And they're like, "Well, you know, like, we're here to protect you, like, if you go,  
20        we have to go with you," you know. They're like, "Okay, all right, let's go." I'm, like, all  
21        right, whatever, you know.

22          So then we went with them up to --

23          Q    Sorry to interrupt. Did they leave Ms. Gracia behind?

24          A    Yes. Yes.

25          Q    Okay.

1           A     She was sleeping. And at that time it was me and this guy Al.  
2               Then we went there and then -- whatever. This is right in the -- this is one -- I  
3     mean, I'm not sure exactly when this was in terms of people breaching the -- how long  
4     was it after they breached the, like, with the barricades, but it must've been over an hour  
5     or 2 hours.

6               So we're there for, like, 20 minutes. I mean, some of the girls we were with, like,  
7     walked up the steps and, like, walked back down. And then there was music and flags  
8     and all that stuff.

9               And then we left. We went back to the hotel. And then things were just  
10   winding down. And I wanted to go back, you know, to see, you know, what's going on,  
11   like, maybe I could interview some people, because I did interview some people that day.  
12   I mean, I always try to interview and get, you know, I mean, people's reactions to stuff,  
13   just to, I don't know, give, like -- just give people content.

14               And then that guy Greek, said, "Oh, I'll go with you." I'm, like, "All right, let's go."  
15   So that's when we went. But Al didn't go this time.

16               Then when we both got there, it was almost over. All right? There were  
17   probably, I don't know, like, 70 percent less people. But we went to the same  
18   spot -- well, actually, I'll tell you, as we were walking over there, somebody was yelling in  
19   the crowd, "Oh, well, they just shot a lady." Right? And I'm like -- I mean, I thought it  
20   was a joke, you now, like, you're kidding, right? And then he's like, "No, no, they shot  
21   her," this and that. I guess they were talking about --

22           Q     Ms. Babbitt?

23           A     Yes, yes. And so I guess it must've occurred at that time, and the guy, I  
24     guess, saw -- I mean, saw the thing.

25               So, like, we walked over there, I mean, kind of hung out at the steps there. I

1 interviewed one or two people.

2 There's this lady I interviewed that she ended up going inside and, I mean, she got  
3 arrested for it. I guess they used my video. But my video's of her outside, but, I mean,  
4 the news took one of my videos of when I was talking to her outside.

5 But, yeah, I mean, I was just there interviewing people.

6 Q And that's the second time you went back after --

7 A Correct.

8 Q -- you had -- okay. Got it. And do you recall -- I guess you said it was  
9 around the time that the Ashli Babbitt shooting occurred. Do you remember checking  
10 the time or anything?

11 A No. But, I mean, it must've been around 5 o'clock, around 4:30, 5. It  
12 was -- it was already, like, getting a little darker. I mean, it was a dark day to begin with  
13 because it was so cold, it was -- I guess D.C.'s always -- I mean, coming from Miami, I think  
14 every day in D.C. is a dark day.

15 But, yeah, it was getting later on. And then the cops already are lined up, like  
16 the riot police were already lined up, ready to move in and just clear out the area,  
17 because there wasn't enough people.

18 And that was -- that was -- that's when I stayed there for, like, around 30 or 45  
19 minutes, yeah.

20 Q So then for the whole day, you were not part of the large group of --

21 A Correct.

22 Q -- Proud Boys that marched down the Mall? Okay.

23 A Right.

24 Q And then you didn't -- there was a meeting of the Proud Boys around 10 a.m.  
25 at the Washington Monument. You didn't take part in that. Did you hear about that

1 meeting?

2 A Yes. I -- well, I heard about a meeting. And the meetings, for some  
3 reason, are always at the Monument. That's why I told you the first meeting, I think, in  
4 November was also in the Monument.

5 But by that time that we had -- because we were attached to, I mean, these  
6 people, we had to go wherever they went. And also, like, the meeting wouldn't pertain  
7 to us, because we're stuck with these people all day, so --

8 Q Do you remember where you heard about the Washington Monument  
9 meeting?

10 A Everybody hung out at Harry's, like the night before, Harry's and in front of  
11 the Phoenix. And on the side of the Phoenix is also a bar. So that. And it could've  
12 been that maybe on some Telegram chat.

13 But I mean, I heard it, but not directed to me, but saying, like, "There's a meeting,  
14 guys, there's a meeting," whatever. And then I would be, like, well, it doesn't apply to  
15 us, so --

16 Q Were you communicating with any other Proud Boys other than the ones  
17 you were with, like, immediately, like the Greek and Al, throughout the day?

18 A No.

19 Q Or at any point in the day?

20 A Well, Telegram's always going off, right? But, I mean, I hardly check my  
21 Telegram, I mean, unless it's a personal message. I have all these groups on mute, you  
22 know, because it's -- I mean, if they're trying -- if it's something important, they'll pin it so  
23 everybody gets it. But, yeah.

24 Q So you don't remember any specific Telegram messages that you read during  
25 the course of the 6th?

1           A     No. No. I mean, it would have to be something instructional, like, for me  
2 to remember it, like, for me to do something, you know, but I don't remember. The bulk  
3 of them is, like, nonsense stuff.

4           Q     And then now that we've been talking about it a little bit, do you recall if  
5 there was the Boots on the Ground chat, larger group of Proud Boys, do you now recall --

6           A     I remember the name. I mean, for sure, like, I remember the name, Boots  
7 on the Ground, I mean, it sounds familiar. And if it's there, I mean, they probably added  
8 me to it. I mean, I don't remember posting anything. I mean, like, what would I post?

9           But the only the thing I posted on that MOSD chat was a reaction to their  
10 stupidity, you know, because, I mean, I feel like, what can I contribute? And I mean, I  
11 think I posted about that it's a bad idea not to have colors, you know, I mean, but apart  
12 from that, yeah. I mean, I don't post unless I really have something to say.

13          Q     Okay. We talked about whether or not you had met some Oath Keepers.  
14 I know you said you met some outside the hotel, didn't remember them specifically.

15          Have you ever met Stewart Rhodes?

16          A     Never.

17          Q     Okay.

18          A     Well, okay, hold on, hold on. I never met him, but if I would've met him, I  
19 wouldn't know who he was, you know. So I -- but I don't remember seeing someone  
20 with an eye patch or something. I mean, that's how I see him. I mean, maybe he had a  
21 fake eye in or something. But I don't remember meeting this guy.

22          Q     Were you with -- what day did you arrive in D.C. for the 6th?

23          A     So it was the day before.

24          Q     On the 5th?

25          A     Yeah.

1           Q     Okay. What did you do on the 5th?

2           A     We flew into Baltimore and -- yeah, I took an Uber from Baltimore to D.C. I  
3 mean, I got there pretty late, probably around 10 o'clock or 9 o'clock or something like  
4 that.

5                 And then -- what did I do? I mean, some of the guys went to Freedom Plaza  
6 there or something, and they were selling shirts, like, Free Enrique -- or  
7 something -- Enrique Tarrio shirts. I mean, that's all I remember. What did I do?

8                 Oh. Oh, yeah, yeah, I was doing security that night, and that's the night I told  
9 you -- I think it was that night -- at the Willard, where Roger Stone and all these guys were  
10 at a, like, a fancy party at the Willard. And they had me at the door of that party  
11 because I was -- because I walked Bianca there.

12           Q     So you were with Ms. Gracia on the evening of the 5th?

13           A     Yes.

14           Q     Okay. Did you go anywhere else with Ms. Gracia?

15           A     No. No. Because this was pretty late. I mean, this was probably -- I  
16 mean, this party must've been already 11:30 at night, because I got there around 10, so --

17           Q     Where did you pick up Ms. Gracia when you walked her there?

18           A     I don't remember. I don't know if I met her there or if I walked her there.  
19 I mean, I doubt I walked her there, because it's a hell of a walk from -- I don't remember  
20 the hotel I was staying in -- were we staying in the Phoenix? I mean, I guess it could've  
21 been the Phoenix.

22                 From the Phoenix to the Willard, it's a pretty long walk, so it could've been that I  
23 met her there. Yeah. I met her there Saturday night -- not Saturday night, you know,  
24 but on the 5th, right when I got there. I don't think I walked her there. I'm for sure, I  
25 mean, I didn't walk her. It was cold and -- I mean, she doesn't walk that far.

1           Q     Okay. For the travel documents that you sent me for the 5th, it looks like  
2     you stayed at the Hilton Garden Inn in Georgetown. Does that ring a bell?

3           A     So I realized that -- okay. So first I booked a hotel not knowing that Bianca  
4     had a room for me, and I let a bunch of other guys stay in that room. But I ended up  
5     staying in the same hotel room as -- I mean, it's really a penthouse. It was a bunch of  
6     rooms were separated by doors, and they had one room for me there.

7           Q     And that was --

8           A     So then --

9           Q     -- that was at the Phoenix?

10          A     I think it's in the Phoenix. It was in the same hotel she was staying. I  
11     mean, I don't remember if it was -- I think it was the Phoenix, yeah, I'm pretty sure.

12          Q     Do you remember, just to help you remember or not, Phoenix is the one  
13     that's right next to Union Station, the big train station?

14          A     Well, I know where the Phoenix -- I mean, like, Phoenix is where everyone  
15     was staying, I mean, outside of the Harrington. Let me think. I think so. I mean, does  
16     the Phoenix have penthouses? Yeah, because it was a penthouse. It was either the  
17     Phoenix or --

18          Q     I believe Ms. Gracia was staying at the Phoenix, so we can -- we can --

19          A     Okay. All right.

20          Q     -- if that's what you're remembering --

21          A     Yeah.

22          Q     -- we can settle on that.

23          A     Uh-huh.

24          Q     Okay. Just talking quickly about other groups.

25     I think you said you've never heard of 1st Amendment Praetorian?

1           A    Uh-huh.

2           Q    Okay. How about Three Percenters, did you talk to, meet, remember any  
3    interactions with Three Percenters for the 6th?

4           A    Not on the 6th. The only time I met a Three Percenter was the previous  
5    meeting, there was some guy, some biker I was talking to, we were talking about  
6    motorcycles, and then, like, he told me he was a Three Percenter. And I didn't even  
7    know what Three Percenters really were.

8           Again, I was -- because I was new into this political activism world, I got to know  
9    who these people were later on, right, I mean, just by meeting them. But it's hard to  
10   find information about these people, at least pre, you know, pre-January 6th or anything.  
11   So, yeah.

12          So, no, I mean, January 6th, I didn't know or meet any Three Percenters.

13          Q    And then who -- you mentioned that the guys, I think the guys you traveled  
14    with on the 5th, went to Freedom Plaza to sell some T-shirts?

15          A    Uh-huh.

16          Q    Who did you travel with?

17          A    So I flew with Gilbert. Who else? I don't know if Gabriel was there. I  
18    mean, Gabe was the other guy in the picture. But I know that he was one of the guys  
19    selling the shirts, but I don't remember if we met him there. But --

20          Q    Was Chris one of them?

21          A    I don't -- I don't know. I don't know. I mean, I --

22          Q    That's fine. So it was folks from Miami, though, that you flew with?

23          A    Yeah, yeah, yeah.

24          Q    Okay. Some of the group that you had flown with on November 14th?

25          A    Yeah. Well, Gilbert was there. And I think -- I mean, Gabriel was there

1 November 14th. And I think that maybe he flew with us, I don't remember. If not,  
2 then we met up with him at the airport or something like that. I mean, the flights were  
3 coming in pretty close to each other.

4 Q Okay. I know in the picture that we looked at earlier of you, the Greek, and  
5 Mr. Macias, you had a radio on your vest. Is that right?

6 A Correct.

7 Q Can you tell me about the radio? Where did you get it? And did you use  
8 it on the 6th?

9 A Yeah. So it was for us to communicate. It was Al, that was the radio that  
10 was given to me by Al, you know, so he was -- because he's a security guy. I don't know  
11 what he did in the Navy, but this is what he does for a living, security.

12 But he put us on a frequency where we could all communicate, but I was never  
13 able to use the radio. "All" meaning the three of us, you know, not anyone else. I  
14 don't think anyone else had radios that day.

15 Q Okay. So you all programmed your radios together, and did you  
16 communicate with the radios?

17 A So I never figured out how to use it correctly. He programmed it, you  
18 know, but I never -- first off, we were close by, and it was -- it was a lot smaller than the  
19 previous events, and we didn't know that, so I guess we overplanned and, you know,  
20 yeah.

21 Q When you say "it," it was a lot smaller, do you mean just that area where  
22 you were performing security and doing --

23 A No, the whole rally. I mean, the whole rally, yeah.

24 Q Compared to, by your impression, I know you said November was really big  
25 and that December was about half the size of November, I think you said. How would

1       you compare the crowd size for January?

2           A     I don't know. It's because all we see is when they all converge in one area,  
3     so it looks like a lot of people. But spread out, it wasn't -- first of all, it wasn't an all-day  
4     rally thing. We were there early because, you know, these guys were speaking on that  
5     stage.

6           But I think people just came out to watch Trump speak and then left, while the  
7     other rallies -- maybe because it wasn't as cold, but people were out all day. I mean,  
8     they were out all day just marching and, you know, hanging out. It was a warmer day,  
9     yeah.

10          Q     Did Josh Macias speak, the one -- the guy whose photo you saw earlier?

11          A     I don't think so. I don't think so. I mean, I saw him with the ladies, they  
12     were walking. I mean, like, part of our ladies, but I'd never heard him speak.

13          Q     Okay. Do you remember a man named Tom or Thomas Speciale speaking  
14     at the event you were at?

15          A     No, I don't -- I don't think so. I mean, it was medical stuff, so I was zoning  
16     out. I mean, it wasn't -- they had a table of bagels and stuff, and that's what I was  
17     eating. I mean, I didn't really pay attention. They were people that I had never heard  
18     of.

19          Q     Okay.

20          A     It's not like, you know -- I mean, there was someone I knew there, and I took  
21     a little clip of him. And I actually got him connected with the person running the stage  
22     and got him to speak, which is Dr. Zelenko.

23           So Dr. Zelenko is an Orthodox Jew like myself. So we were talking, you know,  
24     and I said, "You want to speak?" You know, so then I -- the person who was letting  
25     people on stage, like, guided me to whoever was in charge, and he ended up speaking on

1       that stage.

2           Q    Okay. So other than the Greek and Al, was there anybody else that you  
3       talked to or coordinated with around the security, providing security?

4           A    No. Just those two. I mean, us three.

5           Q    And then I know -- did you do interviews that you've posted to proudboys.tv  
6       on the 6th also?

7           A    Yeah, yeah.

8           Q    Okay.

9           A    There's -- yeah, I mean, there's something like two or three of them there.

10          Q    Okay. Do you have others pictures or videos from the 6th, or have you  
11       posted everything to proudboys.tv?

12          A    I haven't posted everything. I was hesitant to keep any information that  
13       may incriminate people who were at the 6th. This is why, I mean, I -- in other words,  
14       there's people who don't want to know that they were there. That means, you know,  
15       anyone from any small town.

16          So if I post a video and I'm interviewing people and someone else appears in it,  
17       right, I feel that's not fair to them, right, if they don't want to be, you know, wow. With  
18       the other rallies, I figured you're there, I mean, you don't mind letting people know you're  
19       there.

20          But I don't want people to lose their job or whatever. You know, so this is why I  
21       deleted any video that included the faces of other people.

22          First of all, when I was taking it, I never thought that it would come to this. I  
23       mean, you know, until I saw people, you know, getting arrested over what I think  
24       is nothing. I mean, some people got arrested for just being there. Yeah, this is why, I  
25       mean, I didn't continue, like, filming and then -- and just talking to people.

1           But there's video up there, but the video -- the bulk of the videos I have up there  
2 are videos I took before, while I was at the stage, not at the actual, you know, steps.

3           Q    Okay. And you said you deleted other videos that might have had other  
4 people --

5           A    Correct.

6           Q    -- that were in them that didn't -- wouldn't want to be in the videos. Do  
7 you just mean you deleted them from proudboys.tv, or you deleted them fully?

8           A    [Inaudible] my phone. Yeah, yeah. Yeah. No, I never put them up on  
9 proudboys.tv.

10          Q    Okay. So you don't have the videos at all anymore?

11          A    Yeah. I mean, it's not that many videos, but I did interview some people.  
12 But behind them, there were faces of other people.

13          But, again, this portion of the building wasn't penetrated, right? I mean, it was  
14 just -- but anyone who -- who was there, I'd rather them not -- I mean, actually, I felt bad  
15 that they used my video to at least describe a woman who was inside. But there's an  
16 interview I did with her, which actually is on proudboy.tv, but I figured, I mean, she's  
17 arrested anyways. So I left it up.

18          It was some -- like, a pretty lady that I interviewed, something or other. I asked  
19 her, "How do you feel about the Proud Boys?" And then she's like, "I want to marry a  
20 Proud Boy," or something like that, and that kind of was interesting, yeah.

21          Q    Sorry, maybe you answered it, but so I just wanted to make sure. You said,  
22 like, you permanently deleted the other videos from your phone?

23          A    That's right. Correct.

24          Q    Okay. So you don't have those videos anymore?

25          A    No, no, no.

1           Q     So the only videos that you do have of the 6th are posted on proudboys.tv?

2           A     No. There's some videos that I haven't even put up yet of -- but they  
3     weren't at the Capitol. They were at the stage of other -- when I was at the stage, I was  
4     interviewing doctors. I have, like I said, a video with Dr. Zelenko that I don't even think I  
5     put up yet. So those I do have, yeah.

6           Q     Okay. We might afterwards ask you to produce those to us because those  
7     would have been responsive to that subpoena.

8           A     Yeah.

9           Q     So we can handle that after the deposition, and I'll send you a follow-up  
10    email or something.

11          A     Sure, sure.

12          Q     We can figure that out.

13          Okay. And then after -- so after you went back the second time to the Capitol,  
14    when did you end up leaving, or how did you decide to leave?

15          A     It was just dying down. So, I mean, I just went back to my hotel room.

16          Q     And then how about after that, did you leave on the 7th?

17          A     Yes, correct. I left early on the 7th. That's it.

18          Q     Did you see Ms. Gracia again after she went down for her nap?

19          A     I think when I got back in they were there. And there's a little kitchen area,  
20    like, in this penthouse, and I grabbed something to eat there. And that's really it. I  
21    mean, her and I aren't, like, close friends or anything. But, yeah, I mean, I saw her in the  
22    hotel room. I mean, I'm pretty sure. I can't remember. I mean, I remember eating  
23    something. But she was always there. I mean, if she wasn't at some party or giving a  
24    speech, I mean, she was typically in her hotel room, yeah.

25          Q     Just to the best of your recollection is fine. Okay. So you don't remember

1       any specific conversations with her after the 6th?

2           A     No.

3           Q     Okay. And then you flew back to Florida, I take it?

4           A     Yes.

5           Q     And then so since then, you mentioned that the FBI or DOJ used one of your  
6       videos to locate somebody that had gone into the Capitol. Did you --

7           A     Well, not to locate. They had video of her in the Capitol, but they linked it  
8       to this video that actually shows her talking, you know. Because the video inside the  
9       building is, like, surveillance camera video, so it's very choppy, while the video that I took  
10      was, I mean, right in her face, her explaining, da, da, da, da.

11           So that appeared in the news story -- or I don't know if it was a Twitter feed or  
12      something -- explaining who she was and all this stuff.

13           Q     Okay. And how did they get that video?

14           A     I don't know. Well, I guess off proudboy.tv, I guess, you know.

15           Q     So have you spoken to the FBI or DOJ?

16           A     No. No. Well, the FBI served me this -- wait, no, no. No, the FBI came  
17      to my house. Why did they come to my house? Oh, they came to my house to ask me  
18      questions, and they had the same piece of paper that I was subpoenaed with, like, the  
19      one describing me on a plane, this and that. And then I showed them the subpoena and  
20      all the documents, and they're like, oh, you know.

21           So I mean, I guess they were doing double work, so they kind of just filled it out,  
22      and they took a picture of the paper, like, of the paper, and they haven't bothered me  
23      since.

24           Q     Okay. What did they ask you about when you were talking to them?

25           A     Well, right when they started talking, I said, "Hey guys, guys, U.S. Marshals

1        were just here 2 days ago, they served me with this thing, and just take a look at it and  
2        tell me, like, if it's not the same thing that you guys are, like, coming here for," you know.  
3        And that's the extent of it.

4            Q     So they just looked at the select committee subpoena -- that's our  
5        subpoena --

6            A     Right.

7            Q     -- took a picture of it and then left?

8            A     Correct.

9            Q     Okay. And did they take any documents from you, or did they look at your  
10      phone or any of your videos?

11        A     No.

12        Q     Was that odd to you? So all they were interested in was the -- was our  
13      subpoena?

14        A     Well, they weren't interested -- well, that's -- that's what got them to leave.

15        Q     Okay.

16        A     But they took a picture of all the pages, like, the pages that described, you  
17      know, all this stuff. And it seems that -- that -- well, first, I asked them after they took a  
18      picture -- because they didn't read it -- I mean, why, why, something or -- are you here,  
19      and they're, like, oh, something that I was on a plane with Enrique Tarrio, and I'm, like,  
20      "Oh, well, that's exactly what you just took a picture of," all right, you know. Well, so  
21      you saw that they have the same information. So I guess, you know, two agencies were  
22      converging on one case.

23        Q     Okay. And then you've never heard from any other law enforcement about  
24      the 6th since then?

25        A     No.

1 [REDACTED] Okay. All right. I think [REDACTED] has some questions for you, and  
2 then hopefully we can wrap things up.

3 [REDACTED] Thanks, [REDACTED]. Yeah --

4 [REDACTED] I'm sorry, [REDACTED] will also have some questions afterwards.

5 [REDACTED] Yes, I have a couple of questions, and then I'm going to pass it over to

6 [REDACTED]

7 BY [REDACTED]

8 Q Wanted to zoom out a little bit and then also refer back to a couple of points  
9 that were made during your conversation with [REDACTED]

10 My first question is that earlier with [REDACTED] you mentioned that the Proud  
11 Boys were really your only connection to politics.

12 A Uh-huh.

13 Q So I'm wondering, you just joined the Proud Boys in the late summer, early  
14 fall of 2020. And if that was your only connection to politics, what was it about the  
15 threats that we've talked about, of that moment in time, that made you get involved in  
16 politics, get involved in the Proud Boys?

17 A Well, I mean, first and foremost, it was the riots. That's main -- I mean,  
18 there was no -- Trump was President. I think things were flowing nicely, apart from the  
19 media bias. But it was the riots. And I felt that if these riots ever came to my city, I  
20 mean, who could I stand by? I mean, who could I -- you know, who would help me fight  
21 these guys? And that's really the main reason I joined.

22 Q And my next question is, why the Proud Boys, in particular? We've talked a  
23 lot about the racism and anti-Semitism that you've said was present in the national chat  
24 of the Proud Boys. Why did you think that was the best vehicle for you to act on those  
25 concerns?

1           A     I didn't know about these few members that post stupid posts till much  
2       after. Well, these aren't national chats open to everyone. These are national chats  
3       open to Proud Boys.

4           So I didn't become an official Proud Boy till after November, like, after, because  
5       when you're a first degree, you're not a, like, an official Proud Boy till you're a second  
6       degree, right? You- almost have, like, a prospect status.

7           So I didn't know about this till much later, but knowing what I know now, I mean, I  
8       would still join. I mean, I'm not going to invalidate the whole group just because of  
9       some dummies. If anything, I'd like to step in and try to eradicate that element from the  
10      group.

11          Q     You also mentioned to [REDACTED] that you were somewhat of an anomaly in  
12      the Proud Boys, for one reason, because you were trying to institute prayer at Proud Boy  
13      meetings. So I was curious to ask, was there a religious aspect to your activities with the  
14      Proud Boys?

15          A     No. I mean, I wasn't odd because of that. I mean, I'm odd in general. I  
16      don't think most clergymen are involved in -- you know, they're, unfortunately, at least  
17      nowadays, they don't act much. They usually preach, you know, so -- because I was in  
18      the military and I've -- I don't mind getting my hands dirty to stand up for what I believe  
19      in, and I happen to be religious.

20           I mean, I could still get along with these guys and, you know, tolerate the  
21      nonsense, and it doesn't affect my religious bearing.

22           So I don't think there are too many -- not just Proud Boys but people like that.  
23      Right? I mean, most religious people aren't drawn to that.

24           I mean, deeply religious. I mean, I'm not saying someone who goes to church or  
25      to synagogue once a week, but someone who's involved with leadership. I'd like to see

1 more of that, more involvement.

2 Q Why do you think that would be a good thing?

3 A Well, I mean, I always teach that if during the struggle, during hard times  
4 your speaker -- your preacher doesn't put religion aside and spirituality aside and actually  
5 practice what he preaches, right, then it's not worth listening to such a rabbi or pastor  
6 during peacetime.

7 I think that the Founding Fathers were deeply religious. All our biblical heroes,  
8 from King David, King Solomon, you know, these aren't people who would just sit idly by,  
9 but, I mean, King David is the archetypal male in the Bible, and he's essentially a  
10 warrior-poet. It's hard to believe that clergymen nowadays are known for being  
11 noncombatants. That's just how I view it.

12 Q Thanks. On a similar note, I was struck by your mention of sharia as a term  
13 that's used in the Proud Boys bylaws.

14 A Yeah.

15 Q Why that term?

16 A I don't know. I mean, that, for sure, pre-dates me, right? I mean,  
17 contentually, it doesn't even make sense. I mean, I lived in the Middle East, I know a  
18 little bit of Arabic. So, I mean, sharia is the Islamic legal system. I mean, it's equivalent  
19 to what we call halakha. Sharia -- it just sounds silly. I don't know. I mean, yeah, it's  
20 silly. I mean, I think it's -- I think to use the term is silly.

21 Q And that got me thinking. We talked a lot about Judeo-Christian values  
22 today. Is there a role for Muslims in the Proud Boys?

23 A Sure. Most Muslims in America are socially conservative. For some  
24 reason, they vote liberal and they vote left, but it's similar to African Americans. Most  
25 African Americans socially are very conservative. I don't think they vote their values.

1           But if a Muslim -- I mean, Muslims behave -- or publicly behave differently in  
2       Middle Eastern countries than they do in America. They're -- now, that's an extreme  
3       over there, perhaps, you know, like, actual sharia law, right?

4           But I think Muslims have a lot in common with Christians and Jews. I mean, one,  
5       we all elevate the same biblical characters, the same biblical stories, right? I mean,  
6       Islam is an offshoot of both Christianity and Judaism. Why wouldn't they align on  
7       political issue as well?

8           Q     Is the Muslim world compatible with part of the Western civilization world  
9       that we talked about earlier?

10          A     I think it could be. Not the extremists, but I don't think all Muslims are  
11       extreme. I mean, is a jihadist compatible? Absolutely not, just because he's not  
12       tolerant. And I don't think it's -- the approach, like, coming from Judaism or Christianity,  
13       is convert to our religion or die, right? So anyone who bears such intolerance could not  
14       join the Western world. I mean, the one basis of the Western world is tolerance.

15          Q     You also said that you didn't think that January 6th would become an  
16       insurrection or be described as an insurrection after the fact. So I want to ask you, what  
17       do you think January 6th was?

18          A     Uh-huh. I think it was the people fighting back. I mean, not necessarily  
19       an insurrection but letting politicians know that we're not going to allow you to tamper  
20       with our only form of expression here, our only -- the only way that we can really effect  
21       how things -- the things that occurred in our country, i.e., tamper with the ballot box.

22          So they fought back a little bit. I mean, it was very -- I mean, you would see what  
23       was there. It was very -- it was old ladies up on wheel chairs. I remember, like, I  
24       helped an old lady come down the steps on a wheel chair with two other guys. No one  
25       would've thought that it would've been deemed some sort of insurrection.

1           I saw some people with a saint, you know, like, in these, I don't know, old Catholic  
2 processions, you know, marching up the steps. No one would've thought -- now, of  
3 course I wasn't there when they broke the barricades down. But it didn't seem like  
4 there'd be massive repercussions for what happened.

5           I mean -- also, we were just coming out of the riots, the George Floyd riots.  
6 Compared to that, this is why that we thought that that would still drown out anything  
7 that would've occurred on January 6th. This is why I think that many conservatives are  
8 upset today, because society, or at least the politicians, are using a different scale for  
9 deeming the -- to, like, how they deem what's more important or not or what's more  
10 destructive.

11          I mean, they consider January 6th almost as bad as 9/11. So that's -- that's why  
12 I -- I didn't think that this was going to occur, yeah.

13          Q     So as you saw or became aware of folks advancing past the barricades and  
14 moving up towards law enforcement and towards lawmakers in the Capitol, what do you  
15 think they were trying to accomplish?

16          A     No. They were trying to make a point. No one -- now, I can't speak for  
17 everyone, but I don't think anyone there planned to hurt a politician, right? I mean,  
18 they walked in, and they were taking selfies, and no one -- it was -- yeah, they weren't  
19 there trying to hurt anybody. They wanted to make a point.

20          Now, I don't believe the statements that were -- I mean, I saw part of the hearing  
21 of the policeman that were -- the Capitol Police guy, that I think that's -- I mean, I think  
22 they were lying of being called the n-word. I don't see that coming from conservatives,  
23 from the average conservative.

24          It's hard for me to believe that anyone was trying to kill a police officer. Even the  
25 police officer who died and they lied about him being hit with a fire-extinguisher, and

1       then they found out he had some sort of heart attack. Of course, they never apologized  
2       for that lie.

3           I just felt there was a lot of lying going on, right? And all I could really speak for  
4       is what I saw there, and I didn't see a -- I didn't see a mob out to hurt anybody. You  
5       know, I saw, like, voters expressing their anger at essentially what they believed and what  
6       I still believe is having their vote stolen.

7           Q     So where did the signs and the chants about "Hang Mike Pence" fit into all of  
8       that?

9           A     Oh, that's just hyperbole. It's -- every group has it. I mean, no one was  
10      planning to do that, you know.

11          Q     How would you fit in the gallows that had been erected on the Mall?

12          A     Hyperbole. I mean, they weren't planning to actually hang Mike Pence.

13          Q     And the use of bear mace and other sort of attacks on police officers?

14          A     That, I think, if that occurred, it must've been reactionary. I mean, it's  
15      because mace was being sprayed on them. And people brought mace, like they do in all  
16      these events, because of antifa, antifa uses mace.

17           But to say that we're going to mace police officers so we could penetrate the line,  
18      I don't think that was crossing anyone's mind. But, again, I mean, I wasn't at that  
19      portion, but I mean, I saw a video. You know, I saw -- and it wasn't a whole crowd  
20      rushing through. It was -- it was, I guess, a couple troublemakers who got into a scuffle  
21      with the Capitol Police, and then everyone just ran in, you know. I mean, all the people  
22      who were there initially listening to the -- I mean, to the speech, yeah.

23          Q     I guess I would ask, do you think that speech had an encouraging effect on  
24      having people go over to the Capitol?

25          A     No. No. I think Trump specifically says: Now let's march to the Capitol

1       in an orderly, peaceful manner. I mean, I don't think what else -- you know, I mean,  
2       were people upset? Yeah, people were upset. I mean, I think that you don't need a  
3       speech. If people were already angry there, I mean, they flew there to, in some way,  
4       ensure that what they believed that wouldn't occur, i.e., that the vote would be ratified,  
5       that essentially the steal would go through. Of course, they were upset more because  
6       of that than of anything Trump could've said. But I don't think he said anything to rile  
7       anyone up.

8           Q     Were you hopeful that when you went to the event that protests would be  
9       able to stop the steal?

10          A     I was hopeful. I don't know how -- like, what was the real probability of  
11       that. I mean, I just felt that I had to do my duty. And, you know, if nobody shows up  
12       and if conservatives just remain stagnant, then this could occur again and again, you  
13       know.

14          So, I mean, I feel that the way you make things better is not through revolution  
15       but through evolution. I mean, show up for a rally, wave a flag, you know, put a banner  
16       up, put a flyer up, like, even though that initial -- that action is not necessarily going to tip  
17       the scales, you know, but if enough people catch the momentum, then maybe we can  
18       make a change. And that's how I felt about going, not just to this rally, but to any of  
19       these rallies, yeah.

20          Q     So safe to say you don't regret going?

21          A     Oh, no, I don't regret.

22          Q     If there were a similar event in 2024 or 2028, would you go again?

23          A     Yes.

24          Q     And we walked through the indictment. [REDACTED] read you several  
25       passages from the indictment of Mr. Tarrio about sort of plans to occupy State buildings

1       in D.C. Would you still affiliate with the Proud Boys for such an event, given what you  
2       read?

3           A     That what I read doesn't lead me to believe that this is exactly what they  
4       wanted to do. I mean, only because he told them to march in a line and -- I forgot what  
5       the other. But that doesn't -- that's not an open and shut case. I mean, I'm still  
6       convinced, as a Proud Boy, that we had nothing -- if anything, I would know about it, just  
7       because Enrique lives, you know, like, not far from me. I mean, I probably had more  
8       access to him than someone in some other State. I would've known about it.

9           I mean, you're probably thinking, like, maybe I do know about it. But it was  
10      so -- you know, like, if you would know how the Proud Boys function and how disorderly  
11      they are in terms of even getting along with themselves, you would realize how  
12      improbable that was that they could, like, lead some initiative to capture the Capitol. I  
13      don't see it. I don't see it.

14           Q     Just to be clear, given what we went over today, you would do it again?

15           A     Oh, sure. Sure. I mean, I haven't really done anything. But in terms of  
16      being there, showing my support, I mean, I think that these individuals are heroes, the  
17      people who were there and the people who went inside.

18           Now, I'm not for harming anybody, okay? But I think the point was made that if  
19      you try to steal or tamper with the ballot box, the people are not going to put up with it,  
20      and they're going to resist and show their dissatisfaction with the whole ordeal. I'm not  
21      ashamed of that.

22           Q     So you would characterize the act of breaking into the Capitol as a legitimate  
23      form of political protest?

24           A     Yes.

25           ██████████ That's all I have.

1 [REDACTED] over to you.

2 [REDACTED] Thanks.

3 BY [REDACTED]

4 Q Mr. Meza, I just have a couple of questions, then we can get you out of here.

5 From your perspective, what was the impact of January 6th on the Proud Boys?

6 A Oh, it wasn't good at all. It wasn't good at all. However, the media is  
7 going to tarnish anything a right-wing organization does, whether it's, I don't know, like,  
8 protesting a mask mandate or marching outside the Capitol, they're going to -- they're  
9 going to blow it out of proportion and -- but that's expected.

10 Q So, you know, what activities has your chapter of the Proud Boys been doing  
11 since January 6th, what kind of events?

12 A So since January 6th, there's been no semblance of a chapter down here  
13 because in February, Enrique Tarrio was disavowed as a Proud Boy. And I sided with  
14 Enrique Tarrio, which means that we were essentially kicked out of the whole  
15 organization.

16 There was a few chapters that still were supporting Enrique, and I was just there  
17 for anything he needed, you know, any -- a flyer or something like that. Then he went to  
18 jail and nothing occurred -- in his segment of the Proud Boys, which is really nonexistent, I  
19 mean, everyone considered him, like, a snitch or whatever, like that.

20 You know, when he got out in early January, I believe, that's when we started to  
21 rebuild something under Enrique as, I mean, something that looks like a chapter, but  
22 it's -- I mean, it's -- people -- like, we're few in number.

23 And he has a little bit of pull because he's still friends with guys who were in  
24 national leadership to at least recognize his chapter as a chapter. But I would say maybe  
25 80 percent of the Proud Boys don't acknowledge him as a Proud Boy, or anyone beneath

1 him, which would be, like, our chapter.

2 Q Got it. Have people that you know left the Proud Boys after January 6th?

3 A Yes. Yes.

4 Q How many would you say?

5 A Well, not because of January 6th, but because of all the infighting. Like  
6 Vice City, half of Vice City left. They're probably down to, maybe, 12 guys, and they  
7 were, like, 30. They were attacking each other physically, and a lot of people just got  
8 fed up with it.

9 And Florida doesn't really have an antifa problem or a BLM problem. So outside  
10 of flag waves, which doesn't really exist anymore, and mask mandates, protesting those,  
11 there's not really much to do in south Florida, you know, but just meet up at a bar and  
12 have a drink.

13 Q You just mentioned, when you were talking about Tarrio, you mentioned  
14 national leadership.

15 A Uh-huh.

16 Q I thought there wasn't any sort of national leadership still in place.

17 A Right. So there are no more elders, but there are the people who run the  
18 chats, the people who were the elders, right, but there's no, like -- there's no one calling  
19 the shots on a national level. They've given autonomy to every chapter. But the  
20 people who run these chats and who still have the pull, the bulk of them still support  
21 Enrique.

22 Q Got it. And do you know who those people are who run the chats?

23 A I don't know their names. I don't know their names. But, like, whoever  
24 runs the Proud Boy public chat, which is a chat for everybody, for non-Proud Boys, that  
25 guy, because he included our chapter as one of the official chapters. I mean, there's a

1 list online called Proud Boys chapters. I mean, on Telegram. So, yeah, whoever that is,  
2 is someone who's on Enrique's side, yeah.

1

2 [3:17 p.m.]

3 BY [REDACTED]:

4 Q Got it.

5 There is another election happening later this year. Do you think the Proud Boys  
6 will get involved?

7 A The Proud Boys won't get involved unless there's a reason to get involved.  
8 In the beginning of the talk, I said that we're strictly a reactionary movement. Now, a  
9 protest, protesting something is, yes, it's a cohesive reaction to an injustice or anything  
10 like that.

11 I suppose, being that every State has a chapter, or almost every State, that  
12 chapter for sure is going to be there. And if antifa is guaranteed to be there and they  
13 need the help, other Proud Boys will rally around that chapter and travel -- on an  
14 individual basis, right? I mean, like I said, most chapters don't have dues or -- you know,  
15 people pay their own way.

16 So, yeah, I see the Proud Boys still doing their thing, yeah.

17 Q Uh-huh.

18 If Trump ran again in 2024, would you support him?

19 A Yes.

20 Q Do you think that's an opinion shared by most Proud Boys?

21 A Sure.

22 Q I want to return to your conversation with [REDACTED] a couple  
23 minutes ago. Are you familiar with the phrase "Back the Blue"?

24 A Yes. Yes, sir.

25 Q Would you say that you identify with that phrase?

1           A     I back law enforcement. I don't necessarily back all policemen.

2                   So the war here is not against necessarily -- the war waged on the left seems to  
3     be, first and foremost, against police officers. Because we all benefit from law  
4     enforcement, but I acknowledge that some officers, they're amoral, meaning not  
5     immoral, but the level of neutrality that they have to show really doesn't support any  
6     side, even the right side. I mean, they're just doing their job.

7                   So it would be incorrect to say that my values, by definition, gets me to support  
8     police officers in general. No. My values gets me to support law enforcement -- law  
9     enforcement that's essentially there to protect people, make sure people don't steal from  
10    me.

11                  And, you know, so, yes, I support law enforcement, absolutely. I mean, do I  
12    support every cop and what they happen to do? Especially sometimes cops, they turn  
13    on Proud Boys, and what do we say in such a situation?

14                  So law enforcement? Yes, there has to be law enforcement, and I support that.  
15    And if that's backing the blue, then I absolutely support that. But do I support police  
16    officers in general? No.

17                  Q     So, if Proud Boys were committing crimes, would it be appropriate for the  
18    police to take action against them?

19                  A     Well, it depends. It depends. Only because something's illegal does not  
20    mean it's unethical. I mean, in Nazi Germany, it was illegal to house Jews. I mean,  
21    would it have been a proper cause to break the law then?

22                  I think it depends on the case, right? I mean, not wearing a mask in some places  
23    was a crime, right? I mean, I try not to wear a mask as much as possible, and I would  
24    encourage others to do the same.

25                  So, in terms of legality, ethics and legality is something that we can't really -- we

1 can't confuse here, all right? I mean, I think the Proud Boys are, overall, essentially an  
2 ethical institution. Okay. Are they illegal? No, not necessarily, because doing  
3 something the legal way doesn't mean you're doing it the ethical or the moral way. I  
4 mean, not always. I'm pretty sure you guys would agree with that also.

5 I mean, if President Trump -- now, I don't know or care about your politics, but if  
6 some dictator in America or someone you deemed a dictator passed a law that you felt  
7 was unethical, I think that you would feel that it was your moral duty to go against it,  
8 whether it was legal or not, you know.

9 So -- but, again, one man's freedom fighter is another man's terrorist.

10 Q So you see police officers as amoral. And we were talking a little bit earlier  
11 about how Proud Boys are kind of -- I don't want to misstate what you said, but,  
12 essentially, you know, doing things that police officers can't do in public safety situations.

13 A Correct.

14 Q Do you see Proud Boys, sort of, introducing morality into the enforcement of  
15 public safety? Is that their role?

16 A Sure. Sure.

17 Now, there's a difference between "amoral" and "immoral." The office of police  
18 should be essentially an amoral institution, right? They're there to keep the law.

19 But sometimes the law, I mean, depending who's enforcing or who's passing these  
20 laws, don't always align with our values or with morality or with ethics, right? I mean,  
21 this is the history of people misusing power all the time, just to -- I don't know -- when  
22 they weaponize laws to hurt people that they dislike.

23 I think it's the job of the civilians who elect our leader to elect people who align  
24 themselves with our values. But our values as a Nation have initially originated from the  
25 Bible.

1           So it's really incumbent on the civilian to strive to be moral and virtuous and  
2 ethical. And it's the job of the policemen or the military men to be an amoral force that  
3 doesn't care, necessarily, about your circumstance but is just there to uphold the law.  
4 So that's why I'm making a distinction.

5           Q     I guess I'm struggling to understand where you think the legitimacy for the  
6 Proud Boys to act as a sort of extrajudicial paramilitary comes from.

7           A     Yeah. I mean, I think, like, from the same spirit -- and we're not a militia in  
8 any way, but the same spirit that the Founding Fathers felt they had to toss tea in a  
9 harbor or to in some way rebel when government becomes tyrannical. I mean, yes, we  
10 strive to be law-abiding citizens, but when those laws infringe, like, on our religious  
11 values, I think it's incumbent for us to react. And that's what I think Proud Boys do.

12          Q     So are the Proud Boys a drinking club or the founding fathers of something  
13 new?

14          A     Both. Both. I align myself more with the rally side of the club, while the  
15 old-timers, the ones who've been around since 2016, are more on the drinking side. If it  
16 was just a drinking club, I would not join.

17          Q     Okay.

18                [REDACTED] I don't have any more questions. [REDACTED] ?

19                BY [REDACTED]

20          Q     Yeah, just two quick followups on two points.

21               First is, I just want to go back to the November 14th rally quickly and ask you  
22 about those pins one more time --

23          A     Uh-huh.

24          Q     -- and make sure I understand what you said. Do you remember anything  
25 more about what they looked like?

1           A    I'm pretty sure that it was a paw.  Like, a paw, either -- I think it was a dog  
2    paw, a gold dog paw.

3           Q    Okay.

4           A    Yeah.  Like, about that big.

5           Q    And solid gold or any coloring on it?

6           A    Solid gold.

7           Q    Okay.

8           And then you said it was just the six other security guards and you and --

9           A    Six others?  No.  I mean, don't know about the specific number, but there  
10          were other people there, like, other security.  But I don't know exactly how many there  
11          were.  I mean, maybe there was maybe four.  Like, I don't remember exactly how  
12          many.

13           Q    For some reason, I thought I had recalled you saying it was you and the one  
14          Proud Boy and then about six others, but maybe I misremembered that.

15           A    Exact number, I don't know how many they had.  I mean, I think it may  
16          have been maybe three or four.  I don't remember how many there were.

17           Q    Okay.

18           And then I just wanted to confirm -- so, on the 12th, December 12th, the second  
19          event that you attended in D.C., how did you get there again?  Can you just tell me?

20           A    The second event?  Let me see.  The second event, I paid for my ticket.

21           Q    Okay.

22           A    Yeah.

23           Q    And that was just on a commercial flight?

24           A    Correct.

25           Q    Okay.

1           And then, just to confirm one more time, the photo that we looked at -- if we can  
2       pull up exhibit 17.

3           This photo, this was definitely travel related to November 14th?

4           A     Yes.

5           Q     Okay. Okay, great. We can pull that down then.

6           ██████████ All right. I think we're basically done. Let's just take a quick  
7       recess. It's 3:27. We'll go into recess till 3:30. We're just going to check notes and  
8       make sure we don't have any other questions for you. And then we'll be able to get you  
9       out of here.

10          The Witness. All right. No problem.

11          ██████████ Okay. Great.

12          [Recess.]

13          ██████████ We can go back on the record at 3:28.

14          The Witness. Okay.

15          ██████████ And, then, did you have anything else?

16          ██████████ Yeah. I just wanted to follow up quickly on something we were  
17       just talking about.

18          BY ██████████

19          Q     I asked if you saw the Proud Boys as kind of the founding fathers of  
20       something new, and just kind of wanted to complete that thought. Where do the Proud  
21       Boys go from here?

22          A     Well, right now, we're a fraction of what we were a year ago.

23          It really depends. Like I said in the beginning, the Proud Boys are strictly a  
24       reactionary movement. That means, if there's nothing to react to, they go away, right?  
25       But when riots kick up -- and they will, I mean, before the election, because that's just the

1 way it is, I mean, not coming from the right, but from the left -- I think you can be assured  
2 that there will be Proud Boys there. Yeah.

3 Q What do you hope happens in America in the next couple years?

4 A I wish my side wins. And when I mean "my side," I mean conservatives,  
5 Republicans. I think they do a better job in managing the country.

6 I sure wish the economy picks up, but I don't see that happening with a leader  
7 from the Democratic Party running the show.

8 Yeah. That's it.

9 Q Okay.

10 [REDACTED] Great. Then I think we're done with questions.

11 I know this went a little longer than we initially thought, but we really appreciate  
12 your time and answering all of our questions. I know it can be maybe uncomfortable to  
13 answer these sort of pointed questions about ideology and those sorts of things, but I --

14 The Witness. No.

15 [REDACTED] -- hope you understand --

16 The Witness. No, I feel bad for you. I mean, you have to do these interviews  
17 every day. Staff has to do this every day. This is just one day for me. Okay.

18 [REDACTED] All right. Well, I appreciate your understanding.

19 And, with that, we'll go off the record at 3:30 into recess.

20 [Whereupon, at 3:30 p.m., the deposition was recessed, subject to the call of the  
21 chair.]

## 1                             Certificate of Deponent/Interviewee

2

3

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

6

7

8

9

---

10                              Witness Name

11

12

13

---

14                              Date

15