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

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11 DEPOSITION OF: PATRICK MACDONNELL

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15 Monday, April 4, 2022

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17 Washington, D.C.

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20 The deposition in the above matter was held, via Webex, commencing at 10:00

21 a.m.

22 Present: Representative Lofgren.

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2 Appearances:

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5 For the SELECT COMMITTEE TO INVESTIGATE

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

7

8 [REDACTED] INVESTIGATOR

9 [REDACTED] PROFESSIONAL STAFF MEMBER

10 [REDACTED] CHIEF CLERK

11 [REDACTED] INVESTIGATIVE COUNSEL

12 [REDACTED] SENIOR INVESTIGATIVE COUNSEL

13

14 For THE WITNESS:

15

16 MARK LYTLE

17 ROBERT McMANIGAL

18 Nixon Peabody LLP

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2 [REDACTED] Good morning.

3 This is a deposition of Patrick MacDonnell conducted by the House Select
4 Committee to Investigate the January 6 Attack on the United States Capitol pursuant to
5 House Resolution 503.

6 Mr. MacDonnell, please state your full name and spell your last name for the
7 record.

8 The Witness. Patrick Pierson MacDonnell, last name M-a-c-D-o-n-n-e-l-l.

9 [REDACTED] Thank you very much.

10 And would you please raise your right hand to be sworn.

11 Do you solemnly declare and affirm under the penalty of perjury that the
12 testimony you are about to give will be truth, the whole truth, and nothing but the truth?

13 The Witness. Yes.

14 [REDACTED] So this will be a staff-led deposition, and members, of course, may
15 choose to ask questions if they join. I don't see any with us on the Webex right now.

16 My name is [REDACTED] I'm an investigative counsel with the select committee.
17 In the room with me today are [REDACTED] senior investigative counsel, and [REDACTED]
18 [REDACTED] investigator.

19 So we'll follow the House deposition rules that we've provided to your counsel
20 previously. Under the House deposition rules, you are permitted to have an attorney
21 present.

22 Mr. MacDonnell, at this time, I'm going to ask your counsel to please state his
23 name for the record.

24 Mr. Lytle. This is Mark Lytle, L-y-t-l-e, with Nixon Peabody, and also with us
25 that's actually off camera is Robert McManigal, M-c-M-a-n-i-g-a-l.

1 [REDACTED] Thank you.

2 Under the House deposition rules, neither committee members nor staff may
3 discuss the substance of testimony you provide today unless the committee approves
4 release. You and Mr. Lytle will have an opportunity to review the transcript.

5 Before we begin, though, I would like to describe a few ground rules.

6 There's an official reporter transcribing the record of this deposition. The
7 reporter also is joining us by Webex. So please wait until each question is completed
8 before you begin your response, and we will try to wait until your response is complete
9 before we ask our next question. It's just easier for the court reporter if we don't talk
10 over each other. And the reporter cannot record nonverbal responses, such as shaking
11 your head, so it is important that you answer each question with an audible verbal
12 response. For the benefit of the reporter and the record, there may be times where I
13 spell a name or a word that we are using or ask you to do the same.

14 We ask that you provide complete answers based on your best recollection, and if
15 the question is not clear, please ask for clarification. And if you do not know the
16 answer, please simply say so.

17 And, logically, please let us know if you need any breaks or would like to discuss
18 anything with Mr. Lytle privately.

19 Throughout the deposition, we will be directing your attention to exhibits, which
20 will be displayed on the screen. When we refer you to a document, you can take your
21 time to familiarize yourself with it before we discuss it.

22 So if you could please look at exhibit 1.

23 And if we could zoom in a little bit.

24 Can you all see that on your screen, Mr. Lytle?

25 Mr. Lytle. We can. It's got a bunch of PDFs on the left, so it's not the full

1 screen, but we have a copy of it here so we're okay.

2 [REDACTED] Okay.

3 Mr. Lytle. Go ahead.

4 [REDACTED] Do you recognize that as the subpoena and the accompanying
5 documents that the select committee issued to you, Mr. MacDonnell?

6 The Witness. It appears to be, yes.

7 [REDACTED] Thank you.

8 So, under those rules, you may only refuse to answer a question to preserve a
9 privilege recognized by the select committee. If you refuse to answer a question based
10 on the privilege, staff may either proceed with the deposition or seek a ruling from the
11 chairman on the objection. If the chairman overrules such an objection, you are
12 required to answer the question.

13 At this time, I would ask Mr. Lytle to please place on the record any objections he
14 might have or make any opening remarks.

15 Mr. Lytle. None for me right now.

16 [REDACTED] Great. Thank you.

17 I also want to remind you, as we do with all witnesses, that it is unlawful to
18 deliberately provide false information to Congress. Since this deposition is under oath,
19 providing false information could result in criminal penalties, to include for perjury and/or
20 providing false statements.

21 Do you understand, Mr. MacDonnell?

22 The Witness. Yes.

23 [REDACTED] Thank you.

24 EXAMINATION

25 BY [REDACTED]

1 Q So we're just going to get started with a couple of background questions.

2 How old are you, Mr. MacDonnell?

3 A I'm 27 years old.

4 Q Thank you.

5 And can you describe your educational background?

6 A I attended the University of Virginia for an undergraduate in political science.

7 Q And what year did you graduate?

8 A 2016.

9 Q Great.

10 Any graduate degrees?

11 A No.

12 Q Thank you.

13 So what is your current job?

14 A I am a speechwriter and legislative assistant in the U.S. Senate.

15 Q For which Member?

16 A Senator Tom Cotton.

17 Q Very good. Thank you.

18 And did you work for the Trump administration?

19 A Yes.

20 Q What were your roles?

21 A I don't recall all of the titles that I held, but I was a -- started as a researcher

22 and executive assistant I believe was the title. Then I became a senior researcher at

23 some point as well and an assistant speechwriter, and at the end of my time, I believe my

24 title was special assistant to the President and speechwriter.

25 Q Great.

1 So were you there for all 4 years of the Trump administration?

2 A For the vast majority, starting in February of 2017 and I believe ending
3 January 15th of 2021.

4 Q And do you have a rough sense of when you were a researcher, for which
5 months?

6 A For -- no, I do not.

Q Okay. Did you have any jobs before joining the Trump administration?

8 A Yes.

9 Q What were they?

10 A I was a researcher at the Republican National Committee after graduating
11 from college.

12 Q Okay. Thank you.

13 So now we're going to talk a little bit about your --

14 A One clarification on that. Are you asking for any others before --

15 Q No.

16 A -- I graduated?

17 Q No. That's okay. We don't need to go through your entire employment
18 history, but thank you for asking.

19 So now we're going to talk about focusing on the time period from

20 November 2020 until January 2021. At that time, was that when you were in the special
21 assistant role, including your speechwriting role?

22 A Yes.

23 Q Okay. Thank you.

24 And just talking a little bit about the speechwriting process, who did you report to
25 in your office?

- 1 A I reported to -- primarily to Vince Haley and Ross Worthington.
- 2 Q Was there anybody above them?
- 3 A Above them was -- in the office was Stephen Miller.
- 4 Q Okay. Anyone else that you reported to?
- 5 A Not specifically, no.
- 6 Q Mark Meadows, would you say you reported directly to him?
- 7 A No.
- 8 Q Okay. Did anyone report to you?
- 9 A There was a -- the organization of the speechwriting office was a little fluid,
- 10 so it's difficult to answer that question.
- 11 Q What do you mean by fluid?
- 12 A There were two researchers, and due to the fact that I had been a researcher
- 13 for a number of years, occasionally I would give them assistance.
- 14 Q But technically would you say you were their superior or --
- 15 A Yes.
- 16 Q And who were those researchers?
- 17 A William Bock and Macy Mount.
- 18 Q Was Alex Torres also a speechwriter?
- 19 A Yes.
- 20 Q What about Robert Gabriel?
- 21 A What about Robert Gabriel?
- 22 Q Was he also a speechwriter?
- 23 A No.
- 24 Q Okay. And you didn't report to him?
- 25 A Robert Gabriel was Stephen's chief of staff, so he would coordinate

1 occasionally, but I did not report directly to him.

2 Q Got it. Thank you.

3 Was your office in the West Wing or the EEOB?

4 A In the EEOB.

5 Q Were you near Ross and Vince's office then?

6 A Yes.

7 Q Okay. Thanks.

8 So, day-to-day responsibilities, you already mentioned that you helped out a little
9 bit with fact-gathering, but can you tell us a little bit more about that, like what -- how
10 would you gather facts?

11 A By the time -- the timeframe that you are specifying of November to
12 January, I had largely phased out of, for the most part, gathering facts or fact-checking.
13 I was primarily filling in the speechwriting role.

14 Q Okay. So, when you said largely phased out, did you do any fact gathering
15 during that time?

16 A Yes.

17 Q Thank you.

18 And in terms of drafting, did you generally work under one person?

19 A No.

20 Q So it was a team effort?

21 A I -- it depended on the speech.

22 Q Okay. So, generally, then how would you get direction for a speech?

23 A As a general matter, I would receive a speech assignment from either Ross or
24 Vince, and then I would start working on the speech, though occasionally those
25 instructions could come from other individuals, but primarily it was Ross and Vince.

1 Q What other individuals would occasionally instruct you to work on a speech?
2 A Occasionally another writer would need assistance or somebody would pass
3 the assignment on, you know, usually with Ross and Vince's approval is my
4 understanding.

5 Q Okay. Was it, like, Alex Torres? Was it Stephen Miller? I'm just
6 wondering who.

7 A I don't recall.

8 Q Just as a general matter, did you work on one speech at a time, or were you
9 working on multiple speeches at a time?

10 A It depended.

11 Q Okay. Were there ever times where you wrote a whole speech, or were
12 you only working on portions of speeches?

13 A Yes, I wrote whole speeches for the President.

14 Q Did you -- and this is during the November 2020 to January 2021, did you
15 write any whole speeches?

16 A Yes, I believe so.

17 Q Do you recall --

18 A Just for awareness, those are with edits from other individuals and
19 principals. That's understood, correct? Yeah.

20 Q Yes, that is part of the process.

21 Was it Ross and Vince who were providing those edits?

22 A As a general matter, usually Ross and Vince would provide edits.

23 Q Anyone else?

24 A It depended on the speech.

25 Q Understood about that.

1 Would Stephen Miller often provide you edits directly?

2 A I don't know how I would clarify -- how I'd define how regularly he provided
3 direct edits.

4 Q Did he ever provide direct edits on your speeches?

5 A Yes.

6 Q Okay. And how about the approval process before the speech got to the
7 President for your speeches?

8 A Again, it was variable to the speech and the importance of the speech.
9 There was a -- you would usually discuss with policy experts, dependent on the speech or
10 the people who had the greatest knowledge about the subject. And then you would -- it
11 would go through an editing process, usually with Ross and Vince. Then it would go
12 through -- you know, Stephen Miller would see a copy. Then it would go to the staff
13 secretary. The staff secretary would circulate the speech to the principals involved, the
14 people who had stakes in whatever the project was, and then you would get edits back
15 was the general process with my speeches.

16 Q Okay. And did you ever interact directly with President Trump on any
17 speeches?

18 A Not to my recollection.

19 Q Okay. So it's fair to say that if any of this came, they would go through the
20 process you just described?

21 A I believe that that is generally correct.

22 Q Thank you.

23 Did you understand that there's a difference between official and political
24 speeches?

25 A Yes.

1 Q Okay. And would you have considered the January 6th speech to be a
2 political or an official speech?

3 A I don't know.

4 Q You don't know.

5 Did you -- well, we'll come back to it. Thank you.

6 And then here are some questions that we just ask everyone on the record. Your
7 attorney, Mr. Lytle, and yourself have been very forthcoming with documents, but we still
8 have to ask.

9 Did you search your personal computer for all documents responsive to the
10 subpoena?

11 A To the best of my knowledge and ability, I complied with the subpoena.

12 Q Okay. Thank you.

13 Including looking at your personal email account, your [REDACTED]

14 A Yes.

15 Q Okay. Appreciate it.

16 So, after the November 2020 election, you mentioned that you were working on
17 some speeches.

18 Do you remember if they focused on a specific topic?

19 A I don't know if they focused on a specific topic. I don't believe so.

20 Q Okay. Did you write any related to the election or election issues?

21 A To the best of my recollection, I did not work on a -- other than the -- yeah, I
22 have not worked on any election speeches, other than -- in full, fully written. I did not
23 fully write an election speech.

24 Q Okay. Did you fact-check an election speech?

25 A As has been turned over in one of the exhibits, there is a fact-check for one

1 set of remarks, and there is also the insert at the -- you know, insert that I assisted with
2 Ross Worthington in early January of 2021.

3 Q All right. So why don't I pull up the exhibits here. I just want to get a
4 sense of your process for fact-checking so we can go through this together a little bit.

5 Mr. Lytle. Which exhibit, [REDACTED]

6 [REDACTED] Exhibit 2. Sorry.

7 Mr. Lytle. That's the one that we printed out.

8 [REDACTED] Yeah, the one that you printout and I sent.

9 BY [REDACTED]

10 Q So, if you are looking at the first page, we'll just look at your first couple of
11 comments here.

12 You note that whether the data shows -- I guess that would be we have won both
13 North Carolina and Georgia. You say: This is contested and has not been called by any
14 news agency or secretary of states.

15 So, again --

16 Mr. Lytle. Can I interrupt you for just for a second?

17 [REDACTED] Yes.

18 Mr. Lytle. I need to make sure we're on the same page. So hold on one
19 second.

20 [REDACTED] Sure.

21 Mr. Lytle. Okay. We wanted to make sure we were on the right email string
22 and all that.

23 Go ahead.

24 [REDACTED] Understood.

25 BY [REDACTED]

1 Q So I guess a foundational question. Do you remember this speech?

2 A I don't have a particular recollection of the speech.

3 Q Okay. After looking at it, do you recognize it as a speech about the
4 November 2020 election?

5 A It appears to be, yes.

6 Q Okay. And would you agree that you worked on this speech, that those are
7 your comments?

8 A It appears that I provided a fact-check for this set of remarks.

9 Q Great.

10 So, if we look at your first comment, so it's PM1 in the brackets, you note that
11 whether the data also shows that we have won both North Carolina and Georgia. That
12 is the portion of the sentence that you are commenting on, and you say: This is
13 contested and has not been called by any news agency or secretary of states.

14 How would you have come to that conclusion?

15 A In the course of providing fact checks, I would utilize information in the
16 public record or -- such as Google, or if independent information was provided to me to
17 fact-check the set of remarks.

18 Q Thank you.

19 Did you focus on any specific independent sources out there, or were you looking
20 at everything?

21 A I don't recall.

22 Q Okay. And when you say sources provided to you, did that come from
23 internal, in the White House or --

24 A It depended on the set of remarks.

25 Q Okay. Thank you.

1 We can take that exhibit down.

2 Did you also work with the Trump campaign ever on speeches?

3 A Can you clarify -- did I ever work with the Trump campaign? Is that your
4 question?

5 Q Yeah, on speeches during the November 2020 to January 2021 period.

6 A During this period, not to my recollection.

7 Q Okay. Did you get information from the Trump campaign to help you draft
8 speeches?

9 Mr. Lytle. Hey, [REDACTED] what timeframe are we focused on now?

10 [REDACTED] We're still focused on November 2020 to January 2021.

11 Mr. Lytle. Got it. Thanks.

12 The Witness. There are several attachments that were forwarded to me. I do
13 not know where they came from. I don't know if they were -- which I provided to the
14 committee those attachments. I don't know whether that was Trump campaign or
15 whatever.

16 BY [REDACTED]

17 Q Okay. So you don't know. That's fair.

18 Do you recall working on any speeches on election night for President Trump?

19 A I don't recall working on any speeches on election night.

20 Q So I guess the next question then, as one of your research tasks, did you ever
21 have to look for instances of voter fraud?

22 A Again, during this period, my involvement would be very minimal. But in
23 the course of fact-checking this set of remarks, which appear to have accusations of voter
24 fraud, I would have had to look that up in order to confirm or fact-check the set of
25 remarks.

1 [REDACTED] Okay. Could we pull up exhibit 4, page 3.

2 Mr. Lytle. All right. Give us a second, James. Do you got that coming up
3 here?

4 [REDACTED] Yes.

5 BY [REDACTED]

6 Q Do you understand this to be a text message chain involving yourself and
7 William Bock and Macy Mount?

8 A Yes.

9 Q Okay. And then, at the bottom of page 3, the last message is from -- it
10 appears to be from William Bock. It says: LOL Pat! Don't give up!! Find examples
11 of voter fraud! The research is never over! Go go go!

12 Do you remember Mr. Bock sending this message?

13 A I don't remember it, but it is in the record, so, yes, it occurred.

14 Q Do you have any idea what Mr. Bock is talking about?

15 A I don't recall. But based off of the totality of that text chain, it appears to
16 be in jest. But I don't fully recall what he was referring to.

17 Q Do you know why he would specifically say to you "find examples of voter
18 fraud"?

19 A I don't know why he made that joke. I don't know.

20 Q Do you think that you were doing a fair amount of research into voter fraud
21 around November 10th when this -- November 10th when this text message was sent?

22 A To the best of my recollection, I did not do significant research on voter
23 fraud.

24 Q Okay. Can you -- do you remember what you were doing for the
25 speechwriting team around that time?

1 A I do not.

2 Q All right. Thank you.

3 We can take that down.

4 So around -- in early December, I think it was filed December 8th, Texas -- are you
5 aware of a Supreme Court case brought by Texas against other States, including
6 Pennsylvania and Wisconsin?

7 A Vaguely aware due to the fact that it was in the news.

8 Q All right. Did you ever talk about it with friends and family?

9 A I don't recall.

10 Q Okay. We'll go to exhibit 5, page 44.

11 Mr. Lytle. Could we just look at the Bates number? 47.

12 [REDACTED] So I'll note for the record that we had an agreement with Mr. Lytle to
13 redact the contact names, so this is in compliance with the subpoena according to the
14 select committee, just for the record.

15 BY [REDACTED]

16 Q Mr. MacDonnell, do you recognize this as a text message exchange with one
17 of your personal contacts who has been labeled personal contact 3?

18 A I do not know whether it's a text message or not. This may be a Facebook
19 message.

20 Q Okay. But you understand it to be messages or communications between
21 yourself and a personal contact?

22 A Appears to be, yes.

23 Q Okay. And this message on the left -- the messages on the left are from the
24 personal contact, and the ones on the right are from you. Correct?

25 A Yes.

1 Q Okay. This is around December -- you send a message on December 11th
2 in response to your personal contact saying: This Supreme Court case is an affront to
3 democracy. They are trying to normalize complete and utter lies. It's a seditious abuse
4 of the justice system.

5 So do you remember talking about a Supreme Court case during this time?

6 A I don't remember having a conversation on this topic. It was over a year
7 ago now. It appears to have occurred, based off of these messages, that there was a
8 conversation along these lines, but I don't recall the conversation.

9 Q Do you recall the Supreme Court case?

10 A I recall that one existed and am familiar generally with what you're referring
11 to based off of news reports.

12 Q Okay. Why don't we pull up exhibit 6 then.

13 So you can see that this is an email from Mr. Worthington to Robert Gabriel on
14 December 9th, and it has an attachment that says: State versus States complaint,
15 November 30, 2020, version 5.

16 So if we scroll down to page 2, it says: State of A versus Commonwealth of
17 Pennsylvania.

18 Did you work on this complaint during your time at the speechwriting office?

19 A To the best of my recollection, I did not.

20 Q Do you recall any conversations in your office about this complaint?

21 A No, I do not recall conversations about this.

22 Q Were you aware that Mr. Worthington was working on this complaint?

23 A To the best of my recollection, I did not know this.

24 Q Okay.

25 A Not know that.

1 Q Did you know if anybody in the White House was working on this complaint?
2 A I don't recall whether I knew if anybody in the White House was working on
3 it.

4 Q Okay. Was it normal practice for the speechwriting office to be working on
5 complaints that were to be filed with the Supreme Court?

6 A I can only speak to what I personally worked on in the course of my time in
7 the speechwriting shop. I did not work on Supreme Court cases, but I don't -- that is all I
8 can tell you.

9 [REDACTED] Understood.

10 I would like to note for the record that Representative Lofgren has joined.

11 Welcome.

12 BY [REDACTED]

13 Q So, just to follow up on that then, I understand that you didn't work on any
14 of these, but were you aware of the White House working on complaints to be filed in
15 Federal courts?

16 A I don't recall whether I was aware or not at any time. I don't remember. I
17 was not involved.

18 Q Would it have struck you as surprising to know at the time that the
19 speechwriting office was working on this complaint?

20 Mr. Lytle. [REDACTED] that seems like we're getting a little speculative. Can we just
21 go to what his recollection is and stick with what he knew at the time and what he
22 remembers now?

23 [REDACTED] I'm just trying to get a sense. Was it normal practice for the
24 speechwriting office to be working on complaints to be filed in Federal courts.

25 Mr. Lytle. As far as your recollection.

1 [REDACTED] As far as your recollection.

2 The Witness. As far as my recollection, I was unaware that these were occurring
3 so -- or this occurred. So, to the best of my recollection, I didn't know.

4 [REDACTED] Okay. Thank you.

5 Can we pull up exhibit 7, please.

6 Do you recognize this tweet from former President Trump?

7 Mr. Lytle. Can you hear us now?

8 [REDACTED] Yes, I can hear you.

9 Mr. Lytle. [REDACTED] could you restate your question? Sorry.

10 [REDACTED] Oh, sure.

11 BY [REDACTED]

12 Q I said, do you recognize this tweet from former President Trump?

13 A I do not know whether I have seen this tweet in particular before. It
14 appears to be a tweet from the former President, yes.

15 Q Okay.

16 If we could scroll down a little bit just so we can see the date of the tweet.

17 So this tweet was from December 19, 2020.

18 Were there any discussions in the office about this tweet?

19 A I don't recall any.

20 Q Do you recall talking about the substance of the tweet to anybody in the
21 office?

22 A I don't recall any discussion about that tweet.

23 Q Okay.

24 Let's go to exhibit 5, page 50, please.

25 As much as I want to ask you about the dog on the previous page, I will withhold

1 my questions about that.

2 But you'll see at the top that there's a message from your personal contact on
3 December 19th at 6:25 a.m., which I will read: The President is doing a great job!
4 Inciting violence, gritting supporters, ignoring a massive Russian cyber attack.

5 Do you remember what your personal contact was referencing at this time?

6 A To the best of my recollection, I didn't know what -- I mean, I -- the answer
7 to that question is I don't know.

8 Q Well, in your next message responding at 9:28 a.m., you say: He is not
9 inspiring violence. If he was, there would have been antifa-like violence, which there
10 has not been.

11 Can you explain what you meant by antifa-like violence?

12 A I believe what I was referring to is the siege of a Federal courthouse in
13 Portland for several weeks. I believe I read that it was a hundred days, along with
14 extraordinary levels of violence that the organization antifa was responsible for.

15 Q Is this response referencing that December 19th tweet?

16 A I don't know.

17 Q Okay. Were there any discussions in the office about the potential for
18 violence arising out of that December 19th tweet?

19 A I do not recall any conversations about that tweet.

20 Q Okay. So no one stated that that tweet was a bad idea because it might
21 inspire violence?

22 A I can restate the thing that I just said. I do not recall any conversation
23 about that tweet.

24 Q Okay. Why don't we go to page 58 of exhibit 5.

25 So, in your message, December 31st, at 11:54 a.m., the last sentence: I am

1 unaware of anyone credible in the party, quote, literally inciting violence, close quote. I
2 think that is a false statement.

3 Who was inciting violence?

4 Mr. Lytle. Hold on a second, [REDACTED]

5 [REDACTED] All right. Let me restate that question. I'm sorry.

6 Mr. Lytle. Okay. Thank you.

7 [REDACTED] Yeah.

8 Who was your personal contact saying it was inciting violence?

9 Mr. Lytle. If you know.

10 [REDACTED] If you know.

11 The Witness. One moment. I need to read the --

12 Mr. Lytle. Give us a second. He's got to read it over, [REDACTED]

13 [REDACTED] Okay.

14 Mr. Lytle. Go ahead.

15 The Witness. It appears, based off of the preceding messages, that the personal
16 contact No. 3 was alleging that the former President may have been, based off of the
17 comment that he makes: Trump appears crazy and unhinged.

18 BY [REDACTED]

19 Q Do you know why personal contact said that?

20 A I don't.

21 Q Okay. So this message is December 30th and 31st, about 12 days after the
22 December 19th tweet. So, at that point, was anyone in the office talking about the
23 potential for violence on January 6th?

24 A Not that I can recall.

25 Q Were there any conversations about concerns about the former President

1 Trump possibly attending the January 6th march?

2 A I don't recall.

3 Q Okay. So now we're going to move on to the January 6th speech itself.

4 Did you have any role in the speech that the President delivered at the
5 January 6th rally at the Ellipse?

6 A To the best of my recollection, my involvement was a proofread of the
7 remarks, along with I was sent a fill-in-the-blank of introductions.

8 Q Okay.

9 A Which I then filled in.

10 Q But do you remember when you first became aware of the January 6th
11 event?

12 A I don't recall.

13 Q Do you have any -- do you know when the date of January 6th became a
14 focus for the White House?

15 A I do not know.

16 Q Did you know the significance of January 6th?

17 Mr. Lytle. What time are you talking about, James? Give us a timeframe.

18 BY [REDACTED]

19 Q During -- from November 20th to January 2021, did you know the
20 significance of the date January 6?

21 A I don't know for certain. Again, my memory is not great from that period,
22 but I was generally aware from -- I may have been generally aware from reporting that
23 that is when the certification was occurring, but I don't recall.

24 Q All right. Well, let's go to page 31 on exhibit 5.

25 Mr. Lytle. Give us a second, [REDACTED]

1 [REDACTED] Yeah, absolutely.

2 Mr. Lytle. Okay. Go ahead, [REDACTED]

3 BY [REDACTED]

4 Q So I can summarize for you quickly what personal contact is saying is
5 basically that -- asking if this is enough and whether Trump should stop disputing the
6 election. And part of your response, Mr. MacDonnell, is that there's just some stuff that
7 needs to get investigated, and there are more than 6 weeks to do this.

8 This message is on November 19, 2020. I can represent to you that 6 weeks and
9 a couple of extra days from November 19th is January 6, 2021.

10 At this time, were you having conversations in the office about January 6th?

11 A Not that I can recall.

12 Q Were you having conversations, you know, on texts with colleagues about it?

13 A Can you repeat that, please?

14 Q Did you have conversations outside of the office about January 6th at this
15 time?

16 A If I did, I would have provided those records. But to the best -- you know, I
17 don't remember.

18 Q Okay. So, even though you noted that you had little to do on the
19 January 6th speech, do you remember who assigned you to work on the speech?

20 A The fill-in-the-blank assignment I do recall was forwarded to me by Ross
21 Worthington.

22 Mr. Lytle. [REDACTED] give me a second, if you could. I want to talk with my client,
23 if I could.

24 [REDACTED] Sure.

25 [Discussion off the record.]

1 Mr. Lytle. Okay. [REDACTED] we're back, whenever you're ready.

2 You guys got us?

3 [REDACTED] Yeah.

4 Mr. Lytle. I did want to make one comment about your questions about this text
5 messaging or i-messaging back and forth with personal contacts. I would say that, based
6 on what Mr. MacDonnell has said -- and you can ask him -- but it appears like this is
7 something that's outside of work. It's a personal contact of his, and it's someone who
8 appears to be, on the one side, giving sort of a CNN view of things to Mr. MacDonnell,
9 and Mr. MacDonnell is just sort of responding with his own sort of views on -- you know,
10 his personal views on things.

11 These are personal contacts that don't work in the White House. They're not
12 professional communications by him.

13 I just wanted to make sure we clarified that on the record.

14 [REDACTED] No. We understand that. I was using the text message for time.
15 So he -- Mr. MacDonnell is clearly talking about this issue in November, and the question
16 was about whether he's talking about it in the White House at the same time. So that's
17 what I was asking. I'm sorry if that didn't come through clearly.

18 Mr. Lytle. I just wanted to clarify. Thanks, [REDACTED]

19 Go ahead.

20 BY [REDACTED]

21 Q Okay. So I think where we left off is that Mr. Worthington assigned you to
22 work on portions of the speech. Is that correct, Mr. MacDonnell?

23 A If you could please point me to the exhibit, I'm happy to discuss it.

24 Q Okay. So we'll go to exhibit 10.

25 Mr. Lytle. Okay. Just give us a second. It hasn't showed up on the screen yet.

1 Okay.

2 BY [REDACTED]

3 Q Okay. Did Mr. Worthington ask you to work on something for the
4 January 6th speech, Mr. MacDonnell?

5 A Appears to have, yes.

6 Q Where did you get the information about 140 -- more than 140 Members of
7 the House announcing that they would object?

8 A To the best of my recollection, I used public information, but I do not recall.

9 Q And did you draft this top portion of the email: I want to thank...to protect
10 our democracy?

11 A One moment.

12 It appears so.

13 Q Okay. So was it your take that they were joining an effort to protect our
14 democracy by standing up to the certification of the vote?

15 A My job as a speechwriter is not to, yeah, insert my opinions into another
16 person's mouth. It's to reflect the individual's speaking or at least the beliefs of what
17 they say.

18 Q Okay. So this was your interpretation of what President Trump wanted to
19 say?

20 Mr. Lytle. Well, let's just -- let's make sure we clarify, [REDACTED] I mean, this
21 is -- the email speaks for itself. He's asked to fill in the blanks. He goes out on Google,
22 and he fills in the blanks. So, you know, I want to make sure we're asking, you know,
23 apples and apples here in terms of questions.

24 BY [REDACTED]

25 Q Okay. Mr. MacDonnell, as a speechwriter for the President, whose voice

1 were you trying to bring forth in your address?

2 A In writing remarks for the President, it would hopefully reflect the
3 President's words.

4 Q Okay. So, in this draft, were you attempting to accomplish that?

5 A I don't --

6 Mr. Lytle. Let me just step in.

7 Were you asked to write this speech?

8 The Witness. I was not.

9 Mr. Lytle. What were you asked to do with regard to this?

10 The Witness. I was asked to --

11 [REDACTED] He's admitted to being asked to draft this specific paragraph, and I'm
12 asking about the specific paragraph. And he just said that his job was to effectuate what
13 the President would want to say. It is, therefore, fair to ask if that is what he was
14 attempting to do with this specific paragraph that he has said he drafted.

15 Mr. Lytle. I know. But, [REDACTED] you --

16 [REDACTED] That's all I'm asking.

17 Mr. Lytle. You've interspersed sometimes the questions about whether
18 you're -- what you're channeling when you're asking -- when you're writing a speech for
19 the President. So that was more of a general question. And then I just want to make
20 sure we know what the question is about.

21 So, in this particular exhibit 10, he's asked to do a fact-check and fill in the blank.
22 He's not the speechwriter on this speech. So, you know, I just want to -- when we go
23 general to specific, I just want to make sure the record is correct and accurate on that.

24 Okay?

25 [REDACTED] Understood.

1 So I can read in the fill-in-the-blank if you'd like. But the fill-in-the-blank does
2 not have "to protect our democracy." So it is my understanding that Mr. MacDonnell
3 drafted those words.

4 Mr. Lytle. Okay. Do you want to ask that question?

5 BY [REDACTED]

6 Q Mr. MacDonnell, did you draft the words "for joining this effort to protect
7 our democracy"?

8 A It appears that I did.

9 Q Okay. And did you draft that because you believed President Trump would
10 have wanted to say that?

11 A I don't recall exactly what was going through my head when I drafted those
12 words.

13 Q Okay. We'll move on.

14 Did anyone in the speechwriting office ever ask you to talk to Members of
15 Congress or Members of Congress' offices about protesting the certification of the vote?

16 A No.

17 Q Okay. At this time, was Mr. Worthington helping get you your current job
18 in Senator Cotton's office?

19 A Yes.

20 Q Okay. Thank you.

21 So we're going to ask you about some of the drafts of the speech.

22 I take it that you didn't work on all of them, but do you recall if you -- sorry. Did
23 you read a draft that Mr. Worthington circulated on January 5th at 3:30 p.m.?

24 A If you could point me to the exhibit, I can answer that.

25 [REDACTED] Sure. Can you bring up exhibit 13?

1 Mr. Lytle. Okay. Give us a second, [REDACTED]

2 Is this attached to an email? I guess I want to make sure we --

3 [REDACTED] Yeah. Just show the email is on the first page, and it was not
4 sent -- I'll represent to you that it was not sent to you, Mr. MacDonnell, so if you don't
5 remember reading this draft, that's fine.

6 The Witness. So, just to clarify, you're asking me whether I remember a speech
7 that was not sent to me?

8 BY [REDACTED]

9 Q Mr. MacDonnell, I'm [REDACTED] Let me just ask a few questions just to
10 set the scene.

11 Do you remember -- January 4th is a Monday. January 5th is a Tuesday. Do
12 you recall being in the office either or both of those days?

13 A I don't recall for certain where I was on those days. But in the course of a
14 normal work week, that is possible.

15 Q Well, at that timeframe in 2021, was it just your regular practice to come
16 into the office Monday through Friday?

17 A To the best of my recollection, I would have been in the office during the
18 week.

19 Q Prior to you being asked to insert that portion we just looked at earlier by
20 Mr. Worthington, were you aware that Mr. Worthington had been assigned the task of
21 drafting the speech for the President on January 6th?

22 A I don't recall what I knew about what someone else was doing in the office.

23 Q Do you recall having any conversations with Mr. Worthington at any point
24 before January 6 about the direction he had been given for that speech about what the
25 President wanted to say?

1 A I don't recall.

2 Q And do you recall on January 5th, to the best of your memory, being aware
3 that Mr. Worthington was doing several drafts of the speech in advance of January 6th?

4 A I don't recall, you know, having any knowledge on that. I don't recall.

5 Q Then, other than the one that we're going to look at where you were asked
6 to proofread, do you have any memory of seeing any other drafts of the speech before it
7 was finalized?

8 A To the best of my recollection, that is the time that I saw the speech.

9 Q And when you were asked to proofread the speech, did you read it through,
10 beginning to end?

11 A I don't recall the extent to which I read the set of remarks. But, in the
12 course of the proofread, one would read the set of remarks.

13 Q That would be your normal practice to do that, right, to go through the
14 whole thing?

15 A As a general matter, that would be -- yeah, unless there was something else
16 going on. I don't recall, though.

17 Q So why don't we look at that one, then we'll direct your attention to that
18 exhibit, the one that you proofread.

19 Exhibit 14.

20 BY

21 Q And if you want, we can look at exhibit 15 first, which is Mr. Worthington
22 asking you to proofread the email if you would prefer -- I'm sorry -- proofread the speech.

23 So you see it's an attachment: Save America March. This email, the time says
24 12:48 a.m., but there was a -- that's in UTC time, so you have to subtract 5 hours. So
25 that email came to you at 7:48 p.m. on January 5th. And the Save America March that

1 was attached is at exhibit 14, starting on page 2.

1

2 [10:59 a.m.]

3 Mr. Lytle. Give us a second. I'm -- I was following along online, and now it
4 seems like I'm not getting access online anymore, but let me just redo --

5 ██████████ Sure. Do you want to recess in place for a second?

6 Mr. Lytle. Yeah. Can we just do that?

7 ██████████ Yes.

8 Mr. Lytle. Give us about 5 minutes.

9 [Recess.]

10 ██████████ We're back on the record at 11:03 a.m.

11 BY ██████████

12 Q So, Mr. MacDonnell, do you remember proofreading this speech?

13 A Generally, yes.

14 Q Okay. Did you provide any feedback on it?

15 A I don't recall.

16 Q Would it have been your normal course, your normal practice at the time to
17 provide feedback on this speech?

18 A It depends on -- depended on the remarks. So that's a hard question to
19 answer.

20 Q Okay. When Mr. Worthington specifically asked you to provide -- to
21 proofread his speech, would you have provided feedback on it, in your normal course?

22 A I would -- you know, I don't recall specifically about this speech. But in
23 other speeches, when one is asked to proofread and somebody sees a grammatical error
24 or a typographical error, double words for example, you would bring that to the attention
25 of the speechwriter.

1 Q What about if you saw anything that was factually incorrect, in your normal
2 course?

3 A In the course of proofreading a set of remarks?

4 Q Yes.

5 A Again, I would say that it would depend if you had reason to believe that it
6 was inaccurate.

7 Q If you --

8 A -- but that is not the primary role, that's not the primary role of the
9 proofreading.

10 Q All right. But if you, in your normal course of proofreading a speech and
11 you came across something that you believed was factually inaccurate, would you have
12 raised that with whoever asked you to proofread?

13 A I mean, that's a speculative question, but you know --

14 Q It's a pretty specific --

15 A As to my recollection, I did not provide -- you know I don't recall providing
16 any feedback on that set of remarks.

17 Q Okay. And just for the record, you don't recall coming across anything that
18 you found was factually inaccurate in the speech?

19 A I do not recall providing any feedback on this set of remarks.

20 Q Thank you. So where were you on January 6th? Were you at the office or
21 at home?

22 A In what timeframe?

23 Q Did you go into the office on January 6th, 2021?

24 A Yes.

25 Q And did you spend the whole work day there?

1 A I don't recall exactly when I left or when you're referring to the full work day.
2 I was in the office during the day.

3 Q Okay. Do you -- when did you first learn about violence at the Capitol?

4 A I don't recall.

5 Q Were you at the office when you learned about violence happening at the
6 Capitol?

7 A My recollection is not good from that day. I -- there is a -- you know, -- I
8 don't know when I knew about the violence at the Capitol during the day.

9 Q Do you remember how you monitored the events that were going on?

10 Mr. Lytle. [REDACTED] et's back it up. It assumes that -- he didn't say he was
11 monitoring the events.

12 [REDACTED] Sorry.

13 BY [REDACTED]

14 Q Were you -- were you following the events of the day on January 6th?

15 A Yes. I was --

16 Q Okay.

17 A I saw on television what was going on or social media.

18 Q Okay. And you believe -- you don't remember if you were at the office
19 during these events or if you were at home?

20 A Again, I don't recall exactly when I knew about violence at the Capitol. I
21 can tell you when I, you know -- I saw what was on TV while in the office.

22 Q Okay. So you were in the office when there was violence happening at the
23 Capitol?

24 A I do not know when I knew that there was violence in the Capitol, but I was
25 aware of what was going on at the Capitol.

1 Q I'm sorry; I did not say when you knew. I said -- you just said you were
2 watching TV in the office when there was violence at the Capitol. Correct?

3 A I didn't say that. What I said was when I first became aware of something
4 going on at the Capitol. Exactly what was going on I didn't know at the time or I don't
5 know if I knew at the time. But I do recall seeing something going on on TV while in the
6 office. I was attempting to answer your question.

7 Q Can we pull up exhibit 7, page 4?

8 Are you aware that President Trump sent several tweets during the violence at the
9 Capitol?

10 A I'm aware that the former President tweeted on January 6th.

11 Q Okay. Were you aware of those tweets on January 6th?

12 A I don't recall.

13 Q So guessing, did anyone ask you to help draft or review tweets that
14 President Trump sent out on January 6th?

15 A To the best of my recollection, I was not asked to draft tweets related to
16 January 6th.

17 Q Do you know if anyone in the speechwriting office was asked to help with
18 these tweets?

19 A I don't know.

20 Q Okay. Are you aware that President Trump issued a video statement on
21 Twitter at 4:17 p.m., on January 6th, sir?

22 A I don't know when the former President did a remark -- remarks. I'm
23 familiar -- I believe I'm familiar, if you can point to --

24 Q Sure.

25 A I don't have it pulled out.

1 Q I'm sorry. Just scroll down -- we can scroll down to page 6. So it's 4:17
2 p.m., January 6th, 2021. This is a video statement from former President Trump.
3 Were you aware that, on January 6th, that President Trump was making this statement?

4 A I don't recall whether I was aware on January 6th that he did remarks. I'm
5 familiar -- you having provided the exhibit and generally that there were remarks done.

6 Q Okay. Was anyone in the speechwriting office asked to help work on this
7 video or prepare the remarks that President Trump gave during this video?

8 Mr. Lytle. As far as you know.

9 The Witness. I don't know.

10 BY [REDACTED]

11 Q Okay. Other than these tweets and the video, were there any discussions
12 in the office while the attack was going on, on January 6th, about whether the President
13 should issue any statement?

14 Mr. Lytle. If you recall.

15 The Witness. I don't recall.

16 BY [REDACTED]

17 Q And, after January 6th, did you work on any other speeches for President
18 Trump?

19 A Can you repeat that question?

20 Q After January 6th, did you work on any speeches that President Trump gave?

21 A I don't recall exactly what remarks I worked on during that period of time or
22 if I did.

23 Mr. Lytle. And [REDACTED], if you have -- if you have a document that you can show
24 him to help refresh if he worked on something else, but he's given his best recollection
25 now.

1 [REDACTED] I understand he's given his best recollection. Thank you.

2 Mr. Lytle. Hold on one second.

3 [Discussion off the record.]

4 BY [REDACTED]

5 Q I don't think we have that much more to go so it shouldn't take too much
6 longer.

7 Mr. MacDonnell, were you at the rally at the Ellipse on January 6th, 2021?

8 A No.

9 Q Okay. Thank you.

10 So, if we go to exhibit 8, page 84. Actually, you can just scroll up to page 83 to
11 see the date of the messages so right there. These messages with personal contact 4
12 start on January 7th at 9:36 p.m. If you go back to page 84 towards the bottom, it
13 seems you -- personal contact 4 says: He -- referencing President Trump -- got his base
14 amped up and then they went super saiyan.

15 And you respond: I'll read the whole thing, not saying that he had nothing do
16 with it, but this pressure has been palpably building for a year. Maybe the rhetoric
17 could be better, but this is bigger than that.

18 What did you mean by "the rhetoric could have been better"?

19 Mr. Lytle. Okay, [REDACTED] Let me interject. He's got to look at it first.

20 [REDACTED] Okay. Sure. Sorry.

21 Mr. Lytle. Again, just for the record, I want to make sure that the record's clear
22 that Mr. MacDonnell had some interactions with personal contacts over iMessaging.
23 These were personal sort of opinions a by personal contact of his who apparently was
24 reading from CNN and Mr. MacDonnell was responding to it. So, again, it doesn't get to
25 his official interaction with people at the White House. And, you know, we would object

1 to sort of focusing a lot on these documents. We were reluctant to present them to the
2 committee, but because they were called for by the subpoena, we did so. We
3 appreciate keeping personal contacts redacted, the names redacted. But go ahead and
4 ask your questions. But they really are personal opinion related type statements.

5 [REDACTED] So he's on the speechwriting team and he is talking about the
6 rhetoric of the speech on January 6th, which is very relevant.

7 The Witness. Hold on. Hold on. That is not specified in the messages. It
8 does not say on January 6th. That is not an accurate statement. And if you look at the
9 totality of the messages that it's referring to, it's actually a much longer period of time
10 than a single day.

11 [REDACTED] So what rhetoric could have been better?

12 The Witness. I don't recall what I was referring to at that time.

13 [REDACTED] [REDACTED] do you have any follow up there?

14 BY [REDACTED]

15 Q So then I guess, Mr. MacDonnell, if you don't recall what you were referring
16 to, how do we know it wasn't about the January 6th speech?

17 A Based off of the preceding messages, which specifically -- I believe it
18 says -- actually specifically the message that was just referred to, it says: But this
19 pressure has been palpably building for a year.

20 Q Okay. What pressure were you referring to?

21 A I don't recall what pressure based off the context of these messages, general
22 political anxiety.

23 Q When you talk about his rhetoric, you were referring to former President
24 Trump.

25 A It appears so.

1 [REDACTED] I think our colleague, [REDACTED] has some questions. I think you
2 can see her on the video.

3 The Witness. Yes.

4 BY [REDACTED]

5 Q Thank you so much.

6 And, Mr. MacDonnell, thank you for taking so much time with us today. I'm just
7 going to wrap up with some broader questions and build upon, you know, what you've
8 answered for [REDACTED] and [REDACTED]

9 So I'm not a speechwriter. I've never been a speechwriter. So can you maybe
10 walk me through the speechwriting process? So, for example, when writing a speech,
11 what are the key objectives or considerations you have in mind?

12 A I can speak on a very general --

13 Mr. Lytle. [REDACTED], just -- could you clarify just -- are you talking about Mr.
14 MacDonnell's general experience with writing speeches or the general experience at the
15 White House in writing speeches or just -- I just want to make sure the record's clear.

16 [REDACTED]. Sure. Ideally within the scope of his time at the White House, but
17 still any lessons that he learned from his time at the White House that he uses with
18 Senator Cotton today, still relevant. I just want to hear more about the speechwriting
19 process.

20 Mr. Lytle. Okay. We're not going to get into anything with Senator Cotton's
21 office today --

22 [REDACTED] Okay.

23 Mr. Lytle. -- but we will talk about just generally speechwriting. Okay. Thank
24 you.

25 [REDACTED] Perfect.

1 The Witness. As a general matter in -- in a given speech, you -- you know, you
2 will talk to the subject-matter experts, gather information, find out what the objective of
3 the speech is, find out who your audience is. And then you will write the set of remarks
4 and, you know, attempt to match the voice of the person that you're writing for, if you're
5 writing for yourself or whomever. And then it depends on what office you're in or what
6 the -- you know, but then you would circulate it back to people who -- who have
7 subject-matter expertise to make sure that you haven't gotten anything wrong.

8 BY [REDACTED]

9 Q Excellent. Thank you. And so, when you were serving as a speechwriter
10 for the former President, was there -- I guess what was the secret sauce to writing a
11 compelling speech that got people excited? Was there anything -- I guess -- let me
12 rephrase.

13 Was there anything that you consistently kept in mind when writing speeches or
14 editing speeches for President Trump, a specific objective?

15 A As a general matter, I would try to ensure that there were as many facts as
16 possible in the set of remarks that he was giving. He was -- he -- it -- it adds to the
17 effectiveness of the speech and to -- to, I think just general rules of thumb in
18 speechwriting, keep sentences short and pithy and to the point.

19 Q Excellent. Thank you. So, earlier, when prompted by [REDACTED] do you
20 recall that you mentioned that you used Google to identify sources of information?

21 A Yes.

22 Q So, obviously, Google is a search engine and not a source. So I'm just
23 wondering how do you verify the veracity of sources that Google yields through various
24 searches?

25 A It really does depend on the speech that you're dealing with, you know, of

1 how you -- how you can pull data. If you're pulling unemployment numbers, you go to
2 Google and you look up the Bureau of Labor Statistics and you pull it up that way, but you
3 hopefully have a good sense of reliable sources on any given topic.

4 Q Sure. And are there specific sources of information that you relied upon
5 more than others while -- while doing this fact-checking?

6 A What fact-checking?

7 Q I'm sorry. Or were you were speechwriting and gathering facts, were there
8 any specific sources of information that tended to rely upon more than ours?

9 Mr. Lytle. Or fluctuating, depending on the type of topic you're writing on.

10 The Witness. It -- it -- it does fluctuate depending on the -- on the subject
11 matter.

12 BY [REDACTED]

13 Q Okay. So I guess I'd like to hear your thoughts on the effect that Trump's
14 speeches had on his supporters over those 4 years when you were contributing to
15 speeches by President Trump. Do you think that his audiences generally believed what
16 he was saying?

17 Mr. Lytle. You know, I think you're getting beyond. What does he think the
18 listeners believed when President Trump gave a speech? I mean, how does he know
19 that? Could you put some knowledge of what he -- the question seems unclear.

20 [REDACTED] Okay. That's fair.

21 Mr. Lytle. It's all speculation.

22 [REDACTED] Yep. Fair. Okay.

23 So I guess I'll move on to focusing more so on let's see -- bear with me just a
24 moment. I guess I could actually wrap up there. I think that's fine.

25 Do you guys have any other questions?

1 [REDACTED] Just give us one second.

2 [Discussion off the record.]

3 [REDACTED] Mr. Lytle, a standard questioning we've been asking people, so I'll
4 ask just to get a sense of -- I don't want to hear anything about any conversations Mr.
5 MacDonnell has had with you about your representation or anything about the sort, but
6 if -- whether Mr. MacDonnell has had anybody offer to help defray his legal costs as part
7 of this?

8 Mr. Lytle. I don't think -- I don't think I'm going to get into that. I don't think
9 I'm willing to provide that information. Maybe we can address it later on. I
10 don't -- why don't we address later on, but I don't -- actually, I don't think that -- is that
11 appropriate for you to get into? Do you think that that is an a -- I think I'd have to look
12 into that.

13 [REDACTED] I'll just explain, and I'm happy to follow up with you separately, and
14 we can just address it lawyer to lawyer. I will just say for the record, just as a standard
15 inquiry as I think you and I both know from our prior lives whether anybody, whether it
16 would have any effect on their testimony or not if someone was offering to help pay for
17 their legal expenses. That's the reason we're asking. So I'm happy to follow up with
18 you offline, and we can talk about that directly.

19 Mr. Lytle. Okay. That that'd be great.

20 [REDACTED] But I will ask you that point just to round it out.

21 Mr. MacDonnell, has anybody -- I don't want to hear about any conversations with
22 your lawyer -- directed you what to say or suggested how you should answer questions
23 with us today? Put aside -- put aside your lawyers.

24 Mr. Lytle. Hold on.

25 [Discussion off the record.]

1 The Witness. The answer to your question is no.

2 ██████████ Thank you. Okay. I think we're -- looking at my colleagues, we're
3 done. We appreciate the time you spent with us. And we will go into -- recess the
4 deposition. Thank you.

5 The Witness. Okay.

6 Mr. Lytle. Thank you very much.

7 [Whereupon, at 11:26 a.m., the deposition was recessed, subject to the call of the
8 chair.]

2

3

4

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

6

7

8

9

10 Witness Name

11

12

13

14

Witness Name

15

Date