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

DEPOSITION OF: BRANDON STRAKA

Thursday, February 24, 2022

Washington, D.C.

The deposition in the above matter was held via Zoom, commencing at 10:03 a.m.

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Appearances:

For the SELECT COMMITTEE TO INVESTIGATE
THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

- ██████████████████ INVESTIGATIVE COUNSEL
- ██████████████████ PROFESSIONAL STAFF MEMBER
- ██████████████████ INVESTIGATIVE COUNSEL
- ██████████████████ CHIEF INVESTIGATIVE COUNSEL
- ██████████████████ PROFESSIONAL STAFF MEMBER
- ██████████████████ INVESTIGATIVE COUNSEL
- ██████████████████ INVESTIGATIVE COUNSEL
- ██████████████████ INVESTIGATIVE COUNSEL
- ██████████████████ CHIEF CLERK

For THE WITNESS:

BENJAMIN BARR

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2

3 Mr. [REDACTED] With that, we will go on the record at 10:03 a.m. eastern time.

4 Good morning. This is the deposition of Mr. Brandon Straka, conducted to the
5 House Select Committee to Investigate the January 6th Attack on the United States
6 Capitol, pursuant to House Resolution 503.

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

9 The Witness. My name is Brandon Straka. Last name is spelled S-t-r-a-k-a.

10 Mr. [REDACTED] Thank you, Mr. Straka, and I apologize for pronouncing your name
11 "Straka" previously.

12 The Witness. It's okay. Everybody does. Not a big deal.

13 Mr. [REDACTED] Thank you. So this will be a staff-led deposition, and members,
14 of course, may choose to also ask questions if they are present.

15 In the room today we have [REDACTED], myself, investigative counsel. We
16 have Mr. [REDACTED] the chief investigative counsel. There are currently no members
17 present for this deposition.

18 Under the House deposition rules, neither committee members, nor staff, may
19 discuss the substance of testimony you provide today unless the committee approves the
20 release. You and your attorney will have the opportunity to review the transcript after
21 the deposition.

22 Before we begin, I'd like to describe a few ground rules with you. We will follow
23 the House deposition rules that we provided to your counsel previously.

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

1 I would like to note for the record what has been previously marked as exhibit 1 is
2 the subpoena for Mr. Brandon Straka, which is dated January 19th, 2022. You are here
3 for this deposition pursuant to this subpoena. The House deposition rules are included
4 in this exhibit and were previously provided.

5 At this time could counsel please state their name for the record.

6 Mr. Barr. This is Benjamin Barr on behalf of Brandon Straka.

7 Mr. [REDACTED] I'd like to also note that Mr. [REDACTED] investigative counsel,
8 has also joined the deposition.

9 There's an official reporter transcribing the record of this deposition. Please wait
10 until each question is completed before you begin your response, and we will try to wait
11 until your response is complete before we ask our next question.

12 The stenographer cannot record nonverbal responses such as shaking your head,
13 so it's important that you answer each question with an audible, verbal response.

14 Mr. Straka, if I do notice that you are shaking your head, please don't be thrown off if I
15 say, that's a positive response or negative response from the witness, just to make sure
16 we keep the record clean.

17 The Witness. Okay.

18 Mr. [REDACTED] We ask that you simply provide complete answers based on your
19 best recollection. If the question is not clear, please ask for a clarification, and if you do
20 not know the answer, please simply say so.

21 You may also refuse to answer a question to preserve a privilege recognized by
22 the Select Committee. If you refuse to answer a question based on a privilege, staff may
23 either proceed with the deposition, or seek a ruling from the chairman on the objection.
24 If will chairman overrules such an objection, you are required to answer the question.

25 I also want to remind you that it's unlawful to deliberately provide false

1 information to Congress. Since this deposition is under oath, providing false information
2 could result in criminal penalties for perjury and/or providing false statements. Do you
3 understand that?

4 The Witness. Yes.

5 Mr. [REDACTED] Would you please stand and raise your right hand to be sworn in,
6 please?

7 The Reporter. Do you solemnly declare and affirm under the penalty of perjury
8 that the testimony you are about to give will be the truth, the whole truth, and nothing
9 but the truth?

10 The Witness. I do.

11 Mr. [REDACTED] While logistically speaking, please let us know if you need any
12 breaks, like to discuss anything with your attorney. If you need a break, we will go
13 off -- we'll go off the record, go off camera, mute our mics, and you all can discuss
14 however you'd like. It looks like you are in two separate locations, so we'll provide
15 enough time for you all to have a phone call to talk like we were in person.

16 There may be several people asking you questions here today, and if you don't
17 understand the question, just ask me or whoever's asking the question, to repeat it.

18 I also understand that you have prepared an opening statement. If you would
19 like to enter that statement into the record, the Select Committee can accommodate
20 such a request. Would you like to enter this into the record, Mr. Barr or Mr. Straka?

21 Mr. Barr. Yes. We'd like Mr. Straka's personal statement entered into the
22 record.

23 Mr. [REDACTED] Okay. So exhibit 23 is going to be marked as Mr. Straka's
24 statement.

25

[Straka Exhibit No. 23

1 Was marked for identification.]

2 Mr. [REDACTED] Are there any other questions before we get into the formal
3 questioning?

4 The Witness. Not from me.

5 Mr. Barr. I don't think so. I think we may need some time here and there
6 pursuant to what we just discussed. That's simply because we got the link half an hour
7 before the deposition, but, yeah, let's proceed, and as we need to take breaks to review
8 things, we can do that.

9 Mr. [REDACTED] That's sounds great, that sounds good.

10 EXAMINATION

11 BY [REDACTED]

12 Q All right. We'll just start with some background. Mr. Straka, can you
13 please -- what's your current age? Where do you live?

14 A I'm 45 years old, and I live currently in Omaha, Nebraska.

15 Q What's your highest level of education?

16 A I completed 12th grade, and then I went to vocational school.

17 Q What vocational school? What skills did you learn in vocational school?

18 A I went to new cosmetology school in New York City in 2013 and '14.

19 Q All right. What is your current occupation?

20 A I am -- I run the WalkAway Campaign.

21 Q Can you describe, what is the WalkAway Campaign?

22 A So the WalkAway Campaign is a social and political movement that I started
23 in 2018. It began as a social media movement, and then it kind of grew into an
24 organization of which now I am the president and founder of.

25 Q Before the WalkAway Campaign, what did you do for a living, Mr. Straka?

1 A I was a licensed cosmetologist, so I worked as a hair stylist.

2 Q Did you do that in New York City as well?

3 A Yes.

4 Q Okay. I guess, you just described the WalkAway Campaign. I guess, I'm
5 just -- can you help us understand how you started getting involved in political
6 movements, or politics in general?

7 A Sure. So I started WalkAway in 2018, because I was a life-long Democrat.
8 I was a two-time Barack Obama voter, a Hillary Clinton supporter. I always supported
9 the Democratic Party.

10 And in 2017, I kind of went on what I call a journey of research to understand how
11 the media that I trusted up until that point in my life, had gotten the 2016 election so
12 wrong, and why anybody would vote for Donald Trump, because I had so bought into the
13 media narratives about Donald Trump and about who and what he was, and who and
14 what his supporters were.

15 And so throughout 2017, I went on a journey of research to try to understand it,
16 because I was actually in a great deal of emotional distress and pain because of his
17 election, particularly because I'm a gay man living in America. And again, the media
18 narratives were, Donald Trump hates gay people, Donald Trump hates Black people,
19 Donald Trump hates Hispanic people. And I believed all of those lies that the media was
20 telling.

21 But as I began to research and I spent a lot of time talking with Trump supporters,
22 really breaking down the issues and trying to -- and one of the really interesting things I
23 discovered was that a great deal of Donald Trump supporters actually voted for Barack
24 Obama twice and were previous Obama supporters.

25 And, so, I started to understand the appeal of Donald Trump was really about

1 policy, and really about American issues and how the Democrats have gone terribly
2 wrong, and not about racism and bigotry and all of these things that I had previously
3 believed that the support of Donald Trump was about.

4 And so, when I discovered this, I was actually, first of all, very relieved, but also
5 very excited about sort of having this epiphany and discovery. And so, rather than keep
6 it to myself, which is something I considered doing, because when I started to make even
7 the slightest sort of supportive comments, or even just ask questions about Donald
8 Trump, you know, I remember asking questions, like, you know, is the Muslim ban really a
9 ban -- or is it really a Muslim ban, you know, when you consider that there are, like, 50
10 Muslim majority countries in the world, and only five Muslim majority countries were on
11 the ban -- the travel ban list. And then there were two additional countries that weren't
12 even Muslim majority.

13 But the media, of course, was presenting this as Donald Trump hates Muslims and,
14 therefore, is banning Muslims from traveling to this country. So I started asking
15 questions like that publicly, just posing it, like, guys, are you -- have you done your
16 research? Do you actually understand what this really means?

17 And I started getting viciously attacked, even by people who were life-long friends,
18 people who had known me since childhood, who were fellow liberals. And I started to
19 see just how toxic this ideology that I had bought into for my whole life really was.

20 And I don't want to subscribe to something that doesn't allow me to ask
21 questions, doesn't allow me to do my own research or change my mind, because, in my
22 opinion, you can't be a Black or Brown or LGBT person, or any of these, you know,
23 so-called marginalized minority classes in America and actually be free if you're not
24 allowed to partake in the full American experience.

25 So if you have people on the political left telling you you're only allowed to be a

1 Democrat, you're only allowed to believe this, you're only allowed to think this because of
2 the color of the skin, your gender, or your sexual orientation, then that's not the right
3 oppressing you, that's the left oppressing you.

4 And so, I went on a journey to try to share what I learned with other people and I
5 created a video, just a 6-minute video that I put on social media, detailing all of the
6 reasons why I was walking away from the Democratic Party, the ideology of liberalism,
7 and the liberal media that I had once trusted.

8 And this video went extremely viral, and I started encouraging other people to use
9 this hashtag, WalkAway, and tell their own stories about why -- why or how they were
10 discovering the same thing I was discovering.

11 And over the course of years, thousands of videos came in from people who were
12 sharing the exact same experience that I was, and tens of thousands of written
13 testimonials. This was on a Facebook group, the #WalkAway Campaign Facebook
14 Group.

15 And from there, then as the movement grew, as I said, we kind of transitioned it
16 into an organization. And then throughout 2019, and unfortunately because of COVID,
17 most of our plans got cancelled in 2020. So the majority of our work was done in 2019.
18 And that consisted of college campus tour, minority-focused town hall events. We
19 traveled around the country doing WalkAway Black Americans, WalkAway Hispanic
20 Americans, WalkAway LGBT Americans, town halls, in which we would have people who
21 had had this sort of transitional experience come and tell their stories, and encourage a
22 live audience to come and ask questions, debate, engage in dialogue. And we've done
23 rallies, we've done video content.

24 So, it's really sort of educational, it's motivational, it's, I think, inspirational,
25 and -- yeah, I mean, I guess that's really what -- what my organization and my movement

1 is.

2 Oh, well, I'll say, too, I often talk about bringing civility back to political discourse
3 and trying to unify people. And what I mean when I say that is, just as I described
4 earlier, when I was going through my research period and just asking questions or, you
5 know, posting articles and things about things I was discovering, I was viciously and
6 savagely attacked by people.

7 And so I realized what I want is to work toward a goal of creating a world in which
8 people, regardless of skin color, sexual orientation, creed, what have you, are allowed to
9 ask questions or -- or propose thoughts or openly support any political party or candidate
10 that they choose as an individual, and that we can do that in a society that respects each
11 other's differences, not just exterior differences, but diversity of thought and opinion as
12 well.

13 Q Thank you. Does WalkAway have any employees?

14 A We do.

15 Q Okay. Approximately how many? And just help us understand the actual
16 corporate structure or nonprofit structure of WalkAway?

17 A I believe I have five or six, I guess what I would call full-time employees, and
18 then I employ several subcontractors as well -- well, more than several. I probably
19 employ eight to 10 subcontractors on a regular basis. That is to say, graphic designers,
20 videographers, merch manager, sometimes people help us with social media, although
21 that sort of waffles back and forth between being a volunteer position and occasionally us
22 employing someone to do it, that is often inconsistent; lawyers, accountants,
23 bookkeepers, things like that.

24 Q Do you coordinate -- or did you -- and I believe WalkAway is still having
25 events, but I want to focus really on the lead-up to 2020. Did you work with any other

1 grassroots organizations, and if so, which ones?

2 A Well, when?

3 Q Leading up to 2020, so 2019.

4 A Like ever?

5 Q Yes. Like, which grassroots organizations did you work with, if you
6 partnered with any? We've heard of some groups you didn't partner with any, and so
7 we want to know, did you partner WalkAway with other grassroots organizations --

8 Mr. Barr. Objection for clarification, Mr. [REDACTED] Are you asking in
9 relationship to the January 6th event, or participation with grassroots for anything under
10 the sun?

11 Mr. [REDACTED] I'm thinking the town halls he just described, the college and
12 university visits --

13 Mr. Barr. Okay.

14 Mr. [REDACTED] -- was he doing this solely with WalkAway, or was he partnering
15 with other grassroots organizations?

16 The Witness. I guess I'm going to have to give you a yes without having any
17 specifics in mind. Like, when you brought up the college, I know that there are other
18 college clubs or, like you said, other, maybe, grassroots groups who might have invited
19 me to come and speak. And so, I guess I would call that maybe a collaboration.

20 And I'm sure that if I looked back over the last 3 years, there are times that
21 WalkAway was represented at an event where other groups were also represented.

22 BY [REDACTED]

23 Q Were there any other -- any grassroots organizations or groups that pop out
24 in your mind that you might've partnered with more than others during this time? And
25 this is just for information so that we can better understand the WalkAway Campaign.

1 A No, that's fine. Well, as it pertains to particularly college events, I would
2 say that several times the Turning Point USA organization collaborated with -- well,
3 hosted me --

4 Q Got it.

5 A -- I guess, is a better word, hosted me. Honestly, no, I can't think of any
6 organization where there was sort of like a recurring -- I would have to put some thought
7 into that, but nothing comes to mind.

8 Q Thanks. The reason why we ask is because it brings up my next question of
9 how did you start getting involved with Stop the Steal?

10 A So there was a Twitter DM thread, which is to say, like, a private message
11 thread that somebody had created -- I have no idea who because in all likelihood it was
12 probably created significantly before I was added to it. It was called MAGA Verified,
13 which essentially means anybody who is a MAGA or, you know, Donald Trump supporter,
14 who has a blue checkmark next to their name, so as in verified on Twitter.

15 And so somebody had created a group, a direct message group, and so I -- I don't
16 know if anyone here maybe does or does not understand how Twitter works, but with a
17 Twitter DM group, somebody can create a group and just add people. They don't have
18 to have your permission. Then it's up to you to either leave the group or decide if you
19 want to stay in the group.

20 So, like, as right now as we speak, I'm probably added to hundreds of groups
21 because I don't really check my DMs that thoroughly, and I don't make it an effort to go
22 through and remove myself from every group that I'm added to.

23 But this particular group was called MAGA Verified, and it was a collection of
24 people who are verified, you know, Republicans or Donald Trump supporters.

25 And so at some point -- and the other thing is that, when the group is created, you

1 don't have to add people at the inception of the group. So you can create the group and
2 then a year later, you can add more people, and a year later you can add more people,
3 and that's why I say, I have no idea who created the group, but at some point, somebody
4 tossed me into it.

5 And at -- after the election, so I guess around November 5th, I would say, of 2020,
6 several of us were in that group just sort of expressing confusion, exasperation, sadness
7 about how the election results had suddenly changed during the night on November 4th
8 going into November 5th.

9 And then I think over the course -- I mean, I'd have to go back and look, but it was
10 over the course of, I think, a day or two that plans started getting made to kind of deploy
11 to swing States and host these First Amendment-protected events to encourage people
12 to keep their spirits up and encourage their State legislators to hold a thorough forensic
13 audit of the votes in their States, because people were very concerned about
14 irregularities.

15 So I'm going to go out on a limb and assume it was probably Ali Alexander who
16 started using the Stop the Steal hashtag. But the conversation about doing these events
17 began in that Twitter DM.

18 Q All right. And you said, just to understand the timing, it was around, like,
19 the election night and heading into November, like November 5th, the day after the
20 election. Is that fair?

21 A My recollection is that it was days after the event that those conversations
22 began, because I think I went to Michigan very -- I believe I was in Michigan by, like
23 November 7th.

24 Q Got it.

25 A Yeah.

1 Q Can we pull up exhibit 17, [REDACTED]

2 So we'll give you time to look at this document, but it is -- it looks like it's a permit
3 application filed by WalkAway Campaign. The date is October 28 of 2020. It's for John
4 Marshall Park, and it's scheduled -- the proposed scheduled date is for November 15th.

5 If we go down to the second, page, the purpose of the event is a demonstration
6 for free and fair elections. So help us understand, why did you -- what were you
7 thinking about on October 28th to want to have an event on November 15th about free
8 and fair elections?

9 A Can -- I may need to review that document. Can you go back to where it
10 says October 28th?

11 Q Yeah. Up at the top, [REDACTED].

12 A And was this permit submitted by Julie Hanson?

13 Q It was. I was going to ask you who she was as well?

14 A Julie Hanson is an event planner that we've worked with over -- for years on
15 various events that we've done. I can't answer this question, because this doesn't make
16 sense to me. I don't know if she made a mistake when she put the date on the
17 application, or if -- I don't want to speculate why Julie put that date on the application,
18 but I can tell you this doesn't make sense to me, because I thought that Donald Trump
19 was going to win the election, and my reaction to how the election turned out began on
20 November 5th. So it makes no sense to me that I would've done -- I would've asked to
21 submit an application a week before the election. That doesn't make sense to me.

22 Q So it's your -- I just want to make sure we have your testimony clear. You
23 don't recall instructing Ms. Hanson or approving an application in October for this event
24 after the election on November 15th?

25 A Not in October, I don't recall that. I -- again, it just doesn't make sense.

1 Q Okay. Thank you.

2 We can take this down, [REDACTED].

3 Okay. So I just want to make sure we put a button on this. Do you believe that
4 it was probably Mr. Ali Alexander who might've invited you into the Stop the Steal
5 discussions, and this was shortly after Election Day in 2020?

6 A I would -- I mean, I would say that's a fair statement, yes. A lot of people
7 were expressing, again, a lot of the same feelings of confusion, disappointment, shock,
8 and so I -- I would say that Ali was the person who sort of took the lead in terms of
9 logistical, you know, like let's -- let's do these events, and this is where people are
10 needed. So I -- I don't know -- I'm just trying to, with the way you phrased the question.
11 We were all feeling the same thing, and then one person kind of said, Here's where we
12 can do events.

13 Q Okay. I guess, help us understand, to the best of your knowledge, right,
14 because I believe you're with WalkAway, were you officially a member of Stop the Steal?

15 A No.

16 Q Okay. So then to the best of your recollection from working with them,
17 what was Stop the Steal, and what was the purpose of it?

18 A Well, I can only tell you what my assumption is.

19 Q That's all we're asking.

20 A Right. So my belief is that this began as a hashtag to encourage people.
21 So as we had various activists kind of working together, again, to go to different cities and
22 States around the country to hold these, you know, rallies -- excuse me -- we were using a
23 similar -- we were using a hashtag in order to make the message and the presentation
24 cohesive.

25 So the point, in general, of using any hashtag is that you can go on Twitter or

1 Facebook or any social media platform, you can type in that hashtag, and then you can
2 see all the various posts that people are posting about that same topic or issue.

3 And so if I'm in, for example, Lansing, Michigan, doing a rally, and I'm either taking
4 videos or posting, you know, like, great turnout today in Lansing, everybody's spirits are
5 high, you know, and I'm saying Stop the Steal, and then anyone can go on social media
6 and say, Oh, that's what's going on in Lansing.

7 But then they look at the next post and it's another activist who's in Arizona, and
8 that person's saying, Oh, we have a great turnout in Arizona, this is terrific, people are
9 really excited. And so it started out as a hashtag to use, to kind of create a cohesive
10 message and a cohesive space for people to be able to follow the activities that were
11 taking place regarding the election, post-election rallies.

12 And, again, I don't know, but my belief and assumption is that, you know, a week
13 or two or several weeks into us doing this, Mr. Alexander decided to create an LLC using
14 that same name. And I think he also created a website using that same name.

15 Now, to be clear, I didn't really care about any of this, because it didn't really
16 involve me. I -- I was happy to participate in the role of being a speaker at some of
17 these rallies around the country.

18 I also knew that this was a very temporary cause. So, to me, this wasn't going to
19 be, like -- this wasn't going to usher in a change in my career. This wasn't going to usher
20 in, you know, this momentous life change. If Ali wanted to take what we were doing
21 and create an LLC and sell jackets and sell T-shirts, whatever he wanted to do, or anyone
22 else for that matter, I really just didn't care.

23 All I cared was about was going to the events that I told people I was going to go
24 to and speaking at them.

25

BY MR. [REDACTED]

1 Q Got it. That brings me back -- thank you, that was helpful. That brings me
2 back, though, to the permit application from October 28th. It looks like Stop the Steal,
3 the hashtag, I mean, was really starting to get traction early as September 7th of 2020.
4 We've seen tweets of Jack Posobiec doing it.

5 So do you recall maybe filing this application in October, for November 15th, to
6 advance the Stop the Steal messaging that was starting to percolate in September,
7 October, and November of 2020?

8 A Again, it just doesn't make any sense to me. That -- because I believed
9 wholeheartedly that Donald Trump was going to win the election. So it -- it just doesn't
10 make sense to me that I would've decided a week before the election to submit a permit
11 under the assumption that we're going to lose the election. It just -- that just doesn't
12 add up in my mind.

13 Q All right. So you kind of talked about, you alluded to the Stop the Steal, the
14 movement, the hashtag, and the organization that Mr. Alexander set up. So you do kind
15 of view those, Stop the Steal the movement, and Stop the Steal the organization, do you
16 view them separate, or they're kind of the same thing?

17 A I'm not even sure I could answer that question. I -- I was doing my events
18 and speaking at -- and when I say that, I mean, I went to Michigan. So I was -- again, this
19 all sort of began in a Twitter DM, and to the best of my recollection, it was Ali Alexander
20 who was saying, you know, we've got this person in Arizona, we've got this person in
21 Pennsylvania, we've got this person in Georgia.

22 And I remember at some point, I believe it was Ali, telling me, it'd be great to have
23 someone in Michigan, we don't have anyone in Michigan. And I said, I'll go. And so,
24 like I said, very early on, I went.

25 Again, we were all using the same hashtag to be able to sort of cohesively put

1 forward a message, and so that people who were following this would be able to see
2 what was going on in Georgia, what was going on in these various States, and what I was
3 doing in Michigan.

4 Ali doesn't have a -- I'll put it this way. Nobody ever had a conversation with me
5 about creating an LLC, creating an organization, what they were going to do with that
6 organization. And again, I didn't care. It didn't matter to me.

7 Anytime you worked in the world of politics -- and this exists on both sides of the
8 aisle. It doesn't matter if you're far left, if you're left, if you're center, if you're right, if
9 you're far right -- everywhere across the spectrum there are people who will seize an
10 opportunity to turn something into personal gain. And I just stay out of that for the
11 most part, because it doesn't serve me to get involved with what other people are doing.

12 I see it all the time. I see a trend pop up politically. I'm sure -- I'm sure you're
13 probably aware that over the last year, the phrase "Let's Go Brandon" became a very
14 popular phrase. Look how many people are selling "Let's Go Brandon" T-shirts. Look
15 how many people are starting "Let's Go Brandon" websites. Some people have created
16 stores, physical stores, that just sell "Let's Go Brandon" merchandise. This happens all
17 the time. I stay out of it. It's not really my business.

18 So when I had caught wind that Ali was creating an LLC, I thought -- certainly I had
19 opinions about, you know, the altruism of doing something like that, but I stayed out of it.

20 So to answer your question, I was just doing my thing with the -- with the
21 intention of keeping people's spirits up in Michigan and the various places that I went,
22 using this hashtag. When somebody else decided to create an LLC, yes, I would consider
23 that to be different and separate entirely from what I was doing, but I also just stayed out
24 of it.

25 Q Okay. Well, you just mentioned, I'm just curious, what were your thoughts

1 about Mr. Alexander creating the LLC for Stop the Steal?

2 A My personal opinion was that it was probably done with the intention of
3 personal gain. I mean, that's -- that was just my assumption, that there was an
4 opportunity being seized for personal gain.

5 Q Okay. I forgot to note, Mr. [REDACTED] has joined the deposition.
6 He's also an investigative counsel.

7 A Okay.

8 Q Going back to November of 2020, you mentioned that you believed that
9 former President Trump was going to win that election. So shortly thereafter, did you
10 believe that the election had been stolen?

11 A I believed that there were a lot of inconsistencies and irregularities with the
12 election that really should have been examined more thoroughly than they were, and I
13 think a lot of people felt that way, and probably still do.

14 Q Can you help us understand how you came to that opinion?

15 A Yeah. Because there were a lot -- many reports coming out saying that
16 they had discovered high volumes of people who had -- dead voters, under-age voters,
17 people with felonies who were voting, illegal immigrants who were voting. There were
18 reports of massive amounts of ballots in drop boxes that doesn't have signatures. There
19 were reports of -- sorry, it was just in my mind, this was a long time ago, so give me a
20 second.

21 Sorry, I had another example in my mind that just escaped me, but -- oh, that
22 some ballots were being counted after the mail-in due date, that was being reported
23 often. So there were just an enormous amount of reports of different ways in which
24 rules were being bent -- or bended. And so I think that that was really unsettling for a
25 lot of people.

1 Q Do you still have the views you just expressed, do you still have those today?

2 A I don't think about it anymore. I just moved forward. I am looking to the
3 future.

4 Q Okay. I'll just ask you then now, to think about it right now. Do you still
5 believe that these issues occurred in the 2020 election?

6 A Again, I just don't even think about it. It's not something I believe or don't
7 believe. I just don't think about it anymore.

8 Q Got it. So is there any follow-up from any of the staff on that?

9 Okay. So we're going to go through, I would like to go through a list of folks, and
10 if you could just provide us a brief summary of their role with Stop the Steal or planning
11 events for January 5th or 6th, that would be really helpful.

12 You've kind of talked about Mr. Ali Alexander already, but can you please just
13 summarize his role with planning January 6th rallies, by the way? I'm talking about
14 rallies on January 6th.

15 A I'm not aware that he -- well, I mean, I can't honestly say that I'm aware that
16 he planned a rally on January 6th. I know that he had conversations with me, and I'd
17 say, I would estimate, it's a guess, but I would estimate dozens of other people who were
18 under the assumption that we were speaking at an event. To say -- so he was sort of in
19 this point position of relaying information to us, and "us" being -- again, I'm
20 estimating -- probably dozens of people who thought they were speaking.

21 And what we were being told was that he was communicating with people who
22 were organizing, and the information kept changing. It was like, it's happening at this
23 time at this location. Okay, now it's gotten pushed back. Now the President's
24 speaking at the Ellipse. Okay, now the President's speaking at 9 a.m. Well now, the
25 President's -- and by the way, I'm making this up, but I'm just kind of giving you examples,

1 you know -- and now, okay, the President's not speaking at 9 a.m., he's speaking at
2 11 a.m. So we're not speaking at 11 a.m., we're speaking at 2 p.m., and it -- so the
3 details kept changing.

4 So all I can tell you is that I saw him as a point person to receive information from,
5 but I don't know that I could classify it as my belief that he was an organizer of that event.
6 Other than, I remember having one conversation with him about a sound system and him
7 telling me that -- that we can't legally use a sound system on the Capitol Grounds.

8 And then I remember telling him, because I've done dozens of events over the
9 years, I called somebody who works in the D.C. area and does sound production for a
10 living. And this person said, well, you can run a cable and organize a sound stage, like, a
11 block off of the Capitol. And he said, and in that way, you're allowed to legally have a
12 sound system, but he said, you won't actually be at the Capitol, but you'll be kind of near
13 the Capitol.

14 So I mean, I don't know if that is classified as organizing an event, but that's -- I
15 just -- I looked to him to be a point person to be able to ask questions to.

16 Q So I've read your statements, and you talk about how your plan for January
17 6th was to go to the rally at the Ellipse and then go to a speaking engagement at the
18 Capitol.

19 A Uh-huh.

20 Q Who did you understand to be organizing those two separate events, the
21 one at the Ellipse and the one at the Capitol?

22 A My understanding was that the -- the event at the Ellipse was being
23 organized by people within an organization called Women for America First and --

24 Q So Ms. Kylie and Amy Kremer?

25 A I would say that's accurate --

1 Q Okay.

2 A -- yes.

3 I'm not trying to be cute. I really don't remember if I ever thought or knew who
4 was producing the event at the Capitol, because -- I don't know -- and again, there are a
5 lot of things I just stayed out of. I don't know that Ali himself would've had the proper
6 funding or ability to produce the event at the Capitol. I would -- again, this is an
7 assumption -- I would assume he would have to work with other people to do that,
8 because it's -- it's a big undertaking. I've done big events in D.C.

9 Again, I'm not trying to be cute with you or evasive. I don't know that I
10 remember who I thought was, like, the organizer of the event at the Capitol. And it just
11 wasn't really that important to me. I just wanted to be told where to show up, what
12 time, and where's the microphone.

13 Q Got it. Who asked you to speak at the Capitol?

14 A I have to assume it was Ali. Again, the information was changing
15 constantly, and there was -- you know, I'm sure you guys are aware, there was a lot of
16 internal conflict with this Women for America First organization and other people.

17 And it was my understanding that some of the people within Women for America
18 First were trying to kind of prevent some people, probably including myself, from being
19 able to speak or kind of participate, so.

20 And again, I didn't have a direct line of communication with President Trump or
21 anyone, like, in the White House or anything like that. So I was receiving information
22 that was being filtered down. And what was never really clear was if anybody -- clear to
23 me -- was if anybody within the White House actually sort of supported my -- the group
24 that I was doing these events with. Because the Women for America First group kind of
25 started this conflict with several people who were doing Stop the Steal rallies.

1 And then when the information kept changing -- and also it seemed if you were to,
2 like, look at President Trump's Twitter account, that he was supporting the Women for
3 America First group because he kept retweeting this event at the Ellipse. He was
4 actually, I think, even retweeting Kylie Kremer and probably Amy Kremer. And that kind
5 of -- in my opinion, sort of sent this message that he was supporting them.

6 And if he was supporting them, there was a good chance that we were going to
7 get iced out and not be able to speak at all, because my assumption was that the Kremers
8 didn't want many of us to be able to speak or participate.

9 So that's why so many things were kind of up in the air, and, again, I didn't have a
10 direct line of communication. I was just kind of receiving information filtered down
11 from Ali.

12 May I -- would you mind if I just refresh my coffee really quick?

13 Q Sure. Let's -- let's -- how long do you need?

14 A One minute.

15 Q Okay. That's fine.

16 A I'll be right back.

17 Okay. Thank you.

18 Q No problem. I guess, thank you for providing that explanation you just did
19 about the Kremers and Women for America First.

20 A Sure.

21 Q So it's your testimony that you had no idea who was planning the event at
22 the Capitol -- you just gave a great explanation for the Ellipse, but what about the Capitol
23 event?

24 A Again, I -- I don't feel comfortable saying that I knew who organized the
25 event. I knew who I could go to as a point person, and I knew -- which is to say Ali -- and

1 I knew that Ali was filtering information down. I don't know if that means that Ali was
2 an organizer, or if he was representing someone else who was an organizer. And I
3 don't -- I honestly don't remember at this point if it was ever told to me who was officially
4 hosting this event or who that was.

5 Like, here's an example. I remembered thinking it was very strange when those
6 of us who were told that we were speakers received our speaker graphics, and at the
7 bottom of the speaker graphic, it said WildProtest.com. And I remember being, like,
8 what the hell is WildProtest.com? And that seemed strange to me, because, first of all, I
9 had never heard it before. I understood what it was referencing, but I didn't -- I didn't
10 know what WildProtest was or if it was just a website that was being created to provide
11 information for that specific day, but -- this is what I'm saying, like, I don't -- I don't really
12 know who was talking to whom about organizing that event.

13 And then, you know, I know that -- from the news, I know that the permit for that
14 event is under the name -- something about One -- something Under God, whatever.
15 And I don't know what that is. So I -- that's the best I can tell you.

16 Q I just want to be clear. You attended planning meetings leading up to
17 January 6th, correct, like phone meetings?

18 A I wouldn't call them planning meetings. I would call them informational
19 meetings, like, logistical kind of meetings.

20 Q You did group calls --

21 A That's true.

22 Q -- relating to January 6th? And Ali Alexander organized them, correct?

23 A Yes.

24 Q And he's the one that gave you the information for the calls, correct?

25 A Yes.

1 Q And it related to you speaking at the Capitol on January 6th, correct?

2 A Yes.

3 Q Okay. Let's move on. Michael Coudrey, what was his role?

4 A Michael Coudrey, I don't know what his role was. Michael, he had a close
5 relationship with Ali. I know that he was sort of like a secondary person that I could
6 shoot a text message to, to ask for information. If I recall correctly, he was the person
7 who sent me the link to the speaker graphics. He usually -- if I had questions, like,
8 where do we get our lanyards, you know, the, like, passes or whatever, or, you know, do
9 you know what time we're supposed to meet or where we're supposed to meet, I always
10 viewed him as sort of, like, a secondary point person I could go to.

11 And if I recall correctly, sometimes he had the answers, and sometimes he didn't.
12 Like, it seemed like, it was, like, you know, let me check with Ali or let me check with
13 whomever, or sometimes he was able to just answer the questions.

14 I honestly couldn't tell you if he had, like, an official title or role. I can just tell
15 you that he seemed to be in a logistical point person position, and I saw him as a second
16 point of contact.

17 Q Okay. A second point of contact if you couldn't get in touch with
18 Mr. Alexander?

19 A Right.

20 Q Okay. Mr. Alex Bruesewitz?

21 A You know, I don't know Alex well. I think that I first became familiar with
22 him after the election and when, you know, those of us within a social media DM group
23 began communicating with one another.

24 To be honest with you, I still don't know him very well. I mean, which is to say,
25 what he does or -- I know -- I remember looking at his bio and seeing that he -- he did

1 something with, like, marketing or production or something.

2 And during that weekend -- or it wasn't a weekend, but during those days of, like,
3 the 5th and the 6th, I believe on the 5th, I met him for the first time in, I think, the lobby
4 of the JW Marriott, and I had a conversation with him about whatever his company is or
5 his company does.

6 And I said -- I remember saying, you know, we should talk about that because
7 maybe we could together on some stuff, and then we never -- I don't think we ever had a
8 conversation again. So I just -- I don't know much about the guy.

9 Q So we've heard from other witnesses that Mr. Bruesewitz had relationships
10 with several Congressmen. Did you understand him to have relationships with
11 Congressmen as well? Is that kind of what you took from his role?

12 A Again, I don't really feel like I was that involved with him, so I don't know. I
13 really don't know.

14 Q Okay. What about Mr. Ed Martin?

15 A I know I've heard that name, but I can't even think of who that is.
16 I've -- I've got nothing for you.

17 Q Okay.

18 A Sorry.

19 Q Oh, no. It's a rather long list.

20 Ms. Jenny Beth Martin?

21 A Jenny Beth Martin is -- I know her -- I've known -- I've known her name for
22 years, and I know her to be the -- she's one of the people who founded the Tea Party, or,
23 you know, that's her -- that is what she has stated, that she is one of the founders of the
24 Tea Party.

25 She's -- I'm trying to think. I know that I've met her in person, probably more

1 than once, and I know we've talked on the phone several times throughout the years.
2 But I mean, I guess I would just describe her as a political activist who was one of the
3 founders of the Tea Party, and I don't really know what she does today, both, like, as for
4 work or as an activist. But I know that she was involved in conversations about these
5 events -- and when I say "involved," I just mean, like, she was on, like you just said, the
6 kind of logistical calls. And I think she spoke at some of the events, but that's kind of all I
7 know.

8 Q Thank you. Ms. Caroline Wren. We saw messages between you and her,
9 and we've, of course, talked to witnesses about her, but what is your understanding of
10 Ms. Caroline's Wren role -- Ms. Caroline Wren's role in planning events for January 6th?

11 A My understanding is that she -- this is an assumption, but I think it's a very
12 safe assumption -- she was hired by the Women for America First group to be kind of the
13 event planner and coordinator for the -- the event at the Ellipse.

14 And that's actually a perfect example of what I was talking about earlier when I
15 said that the information kept changing, and everything was really inconsistent.
16 Because I know that at some point Ali had said we're speaking at the Ellipse, and then
17 we're not speaking at the Ellipse. And then we are, and then we're not. And that kind
18 of went back and forth.

19 And again, I didn't know if it was because of the friction with the Kremers or if it
20 was some sort of logistical issue or what it was. But I remember literally up until the day
21 of I did not know if I was speaking at the Ellipse or not.

22 And then to the best of my recollection, I met Caroline Wren that day at the
23 Ellipse, and she was kind of buzzing around with a headset and, you know, doing her
24 thing. And I stopped her at one point, and she -- I can't remember what she said, but
25 she made some comment about, we're working on it, we're going to try to get you up

1 there.

2 So it was kind of like, I still was sitting there going, like, I may be speaking at this
3 event or I may not, I have no idea. And I think that she and I exchanged some text
4 messages, like, that day and maybe the day before, where I was still going, do we know if
5 I'm speaking or not? And that's kind of the extent of my relationship and my knowledge
6 of her.

7 Q Got it. And, look, you're -- the messages that you provided in your
8 production all bear that out. It looks like you're information-probing of various folks,
9 whether it be --

10 A Right.

11 Q -- Mr. Ali or Ms. Wren, so definitely bears out in the messages.

12 Ms. Katrina Pierson.

13 A Katrina, you know, works for -- I think she works for the Trump campaign.
14 I -- I don't know what her role is, some sort of adviser. I don't know what her official
15 role is within the Trump campaign.

16 I also know that she has some connection to the Women for America First
17 organization. I'm not saying she's an employee with them or works for them or
18 anything like that. But I believe, my understanding is that she, Katrina, also was a part
19 of kind of the original Tea Party movement, and I think because of that, has a friendship
20 with Amy Kremer, who I think was also a co-founder of the Tea Party movement. And
21 my belief is that they have just sort of maintained a relationship because they had that
22 common experience. And so, I think that -- again, this is an assumption -- but I think
23 that Amy Kremer and Katrina Pierson probably talk somewhat regularly and that that's
24 how -- that Amy said, you know, we're doing this event at the Ellipse, you should be a
25 speaker.

1 And I think Katrina did speak at the Ellipse, I don't remember, but I think she did.
2 But that's -- I don't know Katrina very well. She has come to one or two of my events,
3 but we've never spoken for more than 5 or 10 minutes, just kind of like a cocktail party,
4 you know, kind of acquaintance, sort of hello and goodbye thing.

5 Q Got you. Ms. Megan Barth, we saw her -- I don't know if I'm pronouncing
6 her last name right, but it's B-a-r-t-h --

7 A Yeah, that's right.

8 Q -- for the record. We saw her in some of the Stop the Steal threads. Who
9 is she?

10 A Megan Barth is -- she is somebody that I met years ago. I would estimate I
11 met her in 2019. At the time that I met her, she was doing a podcast. She asked if she
12 could interview me for her podcast. And we did. We sat down and did an interview.
13 Again, I would estimate that it was 2019. She was one of those people that I really liked
14 her personality because she's just very fun and outgoing and my type of person. So we
15 stayed in touch. Not a lot. I mean, we're not, like, best friends, but she's definitely
16 someone I can shoot a text message to, or we'll jump on the phone, we'll talk for a half
17 hour and laugh and laugh and laugh and that's about it, so.

18 But I couldn't honestly tell you -- I mean, I would describe her as an activist and
19 somebody who's passionate about politics, but I don't really know much beyond that.

20 Q So the way we've understood it, looking at some of the production you've
21 made, it appears there are organizers and there are influencers. Is that a fair
22 characterization?

23 A I guess it is.

24 Q Would you put Ms. Barth in the influencer category?

25 A Yes.

1 Q Would you put yourself in the influencer category?

2 A Yes.

3 Q But, like, people like Ms. Caroline Wren, Ms. Pierson, Ms. Kylie and Amy
4 Kremer, they're probably more so in the organizer world?

5 A All -- Ms. Wren, yes. The two Kremers, yes. I couldn't honestly say that
6 about Katrina because I don't know.

7 Q Okay.

8 A I don't know if Katrina was just asked to speak and had no other
9 involvement. I have no clue.

10 Q Okay. And what about Mr. Ali Alexander, is he kind of a dual role of
11 organizer and influencer?

12 A I think that's fair.

13 Q Okay. Thank you. And so, the next folks I'm going to list -- and if you can
14 let me know whether they fell in that influencer role or whether you felt they were an
15 organizer role, that would also be very helpful for the committee, so --

16 A Okay.

17 Q -- Courtney Holland?

18 A Influencer. And she's a very sweet person.

19 Q Okay. Mr. Kevin Mooneyhan -- or I'm going to spell that for the record,
20 M-o-o-n-e-y-h-a-n.

21 A Okay. He's another one that his name has come up for me several times in
22 the last year, and I don't know who he is. So I think that I've been on text message
23 threads with him. It's even possible he asked a question in a text thread and I
24 responded. I don't know who he is. So I -- I cannot recall who that person is.

25 Q Understood.

1 A Yeah.

2 Q Mr. CJ Pearson?

3 A Influencer.

4 Q Influencer. Okay.

5 You kind of alluded to this earlier, so I want to go back sure to make sure we put a
6 button on it. You talked about former President Trump retweeting certain tweets, I
7 believe from the Kremers in particular. What role do you see Mr. Scavino, Mr. Dan
8 Scavino, playing, in, I guess, in the lead-up to January 6th, if you're aware?

9 A I'm not aware. I'm really not aware. The only thing I could tell you is that
10 I have been told that Mr. Scavino sometimes tweets on President Trump's behalf.
11 Again, that's hearsay. I was told that.

12 So I remember being upset when President Trump's Twitter account was tweeting
13 out so many things about the Kremers, because the Kremers had been pretty nasty to me
14 and several other people. And so, I was, like, wow, that's really upsetting and
15 disappointing.

16 And then I believe somebody said, well, that may be Dan Scavino, that might not
17 be President Trump. And so that's the only reason why I believe it's possible that he
18 sometimes tweets on behalf of that account. I don't know that for any other reason.

19 Q Got it. And when we did notice, it looks like Representative Paul Gosar, he
20 was, looks like, sending messages in the Stop the Steal Twitter thread. So what role did
21 Rep. Gosar play in any planning for January 6th?

22 A I have no knowledge of him being involved in planning, but I do remember a
23 phone call -- sorry. Like, I started remembering something in real time.

24 So there was a phone call early on, this is before everything kind of went to hell
25 between the Kremers and others of us. So -- this is oversharing, but I'm just going to go

1 ahead and overshare, because why not?

2 So I remember in one of the very first conversations we ever had, like, literally
3 days after the election, Kylie Kremer was on a group call with several of us that you just
4 described as influencers. And I really laid into her because I found her -- she kind of
5 asserted herself as being the person who was going to plan and organize things, and I
6 found her to be emotionally unstable, and a -- and incompetent.

7 And so, I started kind of laying into her about, you know, have you done this?
8 Have you done this? Have you done this? Have you done -- you know, basic things
9 based off my experience doing events. You know, have you applied for your permit,
10 have you -- do you have a graphic designer? Do you have transportation lined up? Do
11 you have, you know, things like this?

12 And I think she started crying when I started asking her these questions. And
13 when we got off that call, I remember somebody -- and I, to the best of my recollection, it
14 might have been Courtney Holland -- contacting me and saying, Oh, my God, do you know
15 that Representative Gosar was on that call. And I remember kind of laughing about that
16 because I had kind of let her have it, and I know that people thought it was kind of funny
17 that a Representative might've been listening to that.

18 But, again, that was very early on. To my recollection, that was before anybody
19 had done any events, like, before I'd even gone to Michigan or anyone had even
20 gone -- so we're talking about literally, like, the first leading up to going and doing any
21 rallies anywhere.

22 And, honestly, that is the only awareness that I have at all of Mr. Gosar being
23 involved in any way, that I was told he was on that call.

24 Are you there?

25 Mr. Barr. I think you're muted.

1

2 [11:21 a.m.]

3

BY MR. [REDACTED]

4

5

6

7

Q I apologize. I was muted. If you can indulge me a little bit. I think it is interesting that a representative of Congress is in "stop the steal" Twitter threads. I guess, if you know, I'm trying to understand how he got added to the group and why he was even communicating with "stop the steal" leadership.

8

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A I could not tell you that, honestly. And it's -- again, it's quite possible that he was in the MAGA verified group where these conversations began. The phone call that I just described to you, again, we're talking about -- that may have happened on November 6th, like, within 48 hours of Election Day. And so it's possible that he only had an awareness -- I don't want to speculate. I don't want to speculate. But I think it's entirely possible that he wasn't a part of "stop the steal", but that he had gained an awareness through the MAGA-verified Twitter group --

15

16

17

18

Q Can --

A Which by the way -- go ahead.

Q So, can we pull up exhibit 15, please. And this is from documents that you produced to us.

19

20

21

A Okay.

Q And we can just stay right here. Is this the MAGA-verified account because this is Twitter thread where Representative Gosar is actually sending messages?

22

23

24

A I see. No. So there was a second thread that was created after these conversations began. It was a separate group that, which is the one you're showing right now called Stop The Steal Leadership Group.

25

Q Yes, and I guess I'm trying to understand why a Representative of Congress is

1 sending messages in this group.

2 A I --

3 Mr. Barr. Objection. Calls for speculation. It's not fair. You can proceed
4 then.

5 BY MR. [REDACTED]

6 Q Mr. Straka, what is your understanding, if at all, of how Representative Gosar
7 got in this group?

8 A I don't have a -- I didn't create the group. And like I said, I have no
9 knowledge honestly or at least no recollection of him ever posting in this group. So if he
10 did post, okay. But you have to remember, anyone can add anyone to a group. So if
11 he was simply present in the group, he may not have even known he was in the group.
12 But if he posted in the group, I don't know -- I don't recall. I didn't read every message
13 that was in this group.

14 Q One second. I just ask for your indulgence while I get everything --

15 A No problem.

16 Q -- right for you. Can we please go to page 62 of this document?

17 And I just want to give you an example. There are other examples, but 62 is an
18 easy one to find.

19 Can we zoom out of this so we can see the whole page?

20 Look, so this is from January 6th, and we'll get into this later. But, look, this is an
21 example of 5:15 p.m. where it looks like Representative Gosar is telling the "stop the
22 steal" 2020 leadership Twitter group, DM group: We are still on lockdown in the
23 congressional office. So you don't recall seeing when Gosar put messages in this
24 leadership group?

25 A No. Am I to assume that that message was sent on January 6th?

1 Q Yes, that's correct.

2 A Right.

3 Q Do we need to scroll up a little bit to show that? If you need to see it, we
4 can scroll up to show it's on January 6th.

5 A Yeah. No, I have, I honest -- I have no recollection of that. And I was
6 running around D.C. I was on the metro, off the metro walking -- you know, there
7 was -- no, I don't recall seeing that.

8 Q Okay. Thank you. We can take down that exhibit.

9 I guess if you were to guess or speculate -- and I am not saying speculate in a truer
10 sense -- based upon your interactions with folks in "stop the steal", who would have
11 invited Rep Gosar into this group, if you know?

12 A I really don't feel comfortable making an assumption because it would be a
13 total -- I don't know.

14 Q Do you ever recall Mr. Ali Alexander talking about his relationship with
15 Representative Gosar?

16 A Like only in the most faint, faded possible way. I mean, I am actually
17 making this up, to be clear.

18 Q Actually, I want to add in some more facts to make sure we're clear, because
19 Mr. Alexander was publicly saying that he was working with Rep Gosar. So I'm going to
20 ask you again, if he was publicly saying it, you don't recall him talking to you all in group
21 calls or anything about Rep Gosar?

22 A No, I don't. No. Again, I was about to say that I -- I'm sure it did happen,
23 but I -- here is something you need to understand, and I'm sure you probably already do.
24 Ali, in my opinion, is a bit of a talker. There were more than one -- more than one
25 occasion in which I felt he was exaggerating his connections with people or his influence

1 with it -- and, again, that's not really that unusual in the world of politics.

2 Everyone wants to make everyone else believe that they're somebody bigger than
3 who and what they actually are. It's pretty common. So, yes, I do -- I don't have any
4 specific recollection, but I do believe that what I was about to say is in the faintest part of
5 my memory, that there were probably comments made on phone calls like, oh, yes, I just
6 got off the phone with this person, or I just got off the phone with that person, and things
7 are looking good and stuff.

8 And, honestly, a vast majority of the time, I kind of rolled my eyes, and I was like,
9 sure you did. You know, I mean, but, again, it didn't really matter to me. You know
10 and I -- if I had come to -- I went to that event at the Ellipse literally not knowing if I was
11 going to be speaking or not going to be speaking. And I was comfortable with that. I
12 wanted to speak. But if I didn't get to speak, it was fine.

13 So this wasn't -- I was taking everything with a grain of salt; everything that was
14 being told to me. Because I thought to myself -- you know, I have a pretty large
15 following, as I'm sure you know, and a big part of my work throughout the last 2 or
16 3 years has been I've gone to the Women's March, I've gone to MAGA rallies, I've gone to
17 Antifa events, I have gone to Black Lives Matter events, I've gone to -- any number of
18 different types of political rallies and events, I document them, I interview people. I
19 have probably hundreds of hours of footage of me documenting and interviewing and,
20 you know, showing these things to my audience.

21 So my position was, I'm going to go to this event in D.C., I am either going to be
22 speaking, as I hope I am, I hope I am going to be speaking. But if it turns out that I don't
23 get to speak, because it's really not up to me, then I've got my camera, I've got my
24 microphone, I am going to turn it into an opportunity to create content from my
25 audience.

1 So it wasn't -- I don't even remember at this point why I'm going down this road.
2 But, you know, a lot of things were told to me, and I took them all with a grain of salt.
3 And I guess my mindset was let's just see what happens when it happens. And when I
4 know what's happening, I'll react accordingly. Either I'm going to be speaking, or I am
5 going to be interviewing people and shooting footage. So a lot of things were told to
6 me, and some of them I believed, and some of them I didn't.

7 Q So if Mr. Alexander, for instance, said in a group call, I just got off the phone
8 with the White House, or I just talked to Representative Biggs or Representative Gosar,
9 you're saying that you might not have always believed that he was actually having these
10 conversations?

11 A That's -- yes, that is absolutely accurate. I would take it a step further and
12 say that I often assumed it probably wasn't the way it was being presented.

13 Q Did you believe when Mr. Alexander would say he was talking to the White
14 House, did you believe that to be Ms. Caroline Wren?

15 A No, and, in fact, if I recall correctly, I don't think that we ever got an answer
16 as to who that was. There were several people that -- other speakers that I had
17 conversations with, and those are the kind of questions that we would kind of ask each
18 other privately. Like, who is he talking to inside the White House, or like what is this
19 contact that he's getting information from? And so I -- I didn't make an assumption.

20 Well, I can answer that question. No, I don't think I ever assumed it was Caroline
21 Wren because I don't think I had heard of her until literally like right before January 5th,
22 and I didn't know who it was.

23 Q Okay. Mr. Barr, Mr. Straka, this is probably a good 5-minute break point
24 for us before we head on to the next line of questions. So let's take a 5-minute recess
25 and come back on the record at 11:20 a.m. eastern time, 10:20 a.m. central time.

1 A Okay.

2 Mr. Barr. Okay. We'll see you then. Thank you.

3 [Recess.]

1

2 [11:21 a.m.]

3

BY MR. [REDACTED]

4

Q We are going back on the record 11:21 a.m. eastern time, 10:21 a.m. central

5

time.

6

Mr. Straka, you mentioned you discussed kind of the planning call, I believe, with

7

Ms. Kylie Kremer where you all had the conversation about her filing permits and hiring a

8

graphic designer. That's what you just discussed, right, before you went on break?

9

A Right.

10

Q This was in the lead-up to the November 14th rally. Is that correct? The

11

one in D.C.?

12

A Well, it was before that day, and I guess --

13

Q In the lead-up -- was it in the lead-up to November 14th rally?

14

A Right, I am just trying to be cautious because I don't honestly remember if it

15

was about that event, but it is accurate to say it was in the lead-up to that event, yes.

16

Q So then what would she be filing a permit for other than that event?

17

A Well, because, again, we were doing events all over the country. So the

18

thing I can't remember is if this was about one small event like in Lansing, Michigan, or

19

Detroit, or something, or if this was about the big event in D.C.

20

Q Well --

21

A Honestly, it would make sense -- I'm sorry.

22

Q Because we only understand that the Kremers had any involvement with

23

Stop The Steal for the November 14th event, not Detroit and Lansing. So did the

24

Kremers have involvement in the Michigan protests as well?

25

A They were supposed to.

1 Q Okay. Got it.

2 A And I think --

3 Q Help me understand the lay of the land then of that, I guess, in the
4 November lead-up events, with the one being in D.C. or in Michigan, who was the
5 coalition planning these events?

6 A The events leading up to November in D.C.?

7 Q Yes.

8 A So, if I recall correctly, I did, I think I did a total of three events in Michigan.
9 I think I did either two in Detroit, and one in Lansing, or two in Lansing and one in Detroit.
10 I didn't actually organize any of these events, somebody else had already organized them.
11 And I get that your question is who. Give me a moment on that.

12 What I recall being told, initially, was that in those early, early days, because,
13 again, this is -- I think this is -- I believe those Michigan events were -- I would estimate
14 they were like November 8th, 9th, and 10th, like days after the election. And what I
15 recall initially was being told, I think by Ali, that the Kremers were in Georgia doing a
16 small -- doing small rallies, and that they were coming to Michigan, and that they were
17 going to be speaking in Michigan at the same event or events that I was speaking at.
18 And then I believe they didn't come to Michigan. And that's why I was like, I don't
19 remember if the argument that I had with Kylie was about that or if it was about
20 something -- I just don't recall anymore.

21 But the events in Michigan, I mean, I don't think you're going to be happy, but I
22 don't really know or recall -- I'm not even sure if I ever knew who actually had put them
23 together. I just remember Ali saying to me, we don't have anyone to speak in Michigan,
24 and I said, I'll go.

25 So I went and what I -- if I recall correctly, there were already groups of people

1 who were gathering every day at like noon or something, and they were doing that at,
2 like, Capitol buildings in States across the country, and also outside of the, like, the voting
3 centers.

4 And I'm not going to be able to remember at this time what the name of the
5 voting center was in Michigan, but I know that I did at least one event outside of the
6 voting center, and then I think I did at least one event outside of the Capitol.

7 And if I recall correctly, I did a total of three events. So it was two at one, one at
8 the other, and I -- but they were already happening. So I didn't like -- I wasn't on the
9 phone being like, you know, planning stuff with the organizers. I just basically showed
10 up and spoke.

11 Q Mr. Straka, from reviewing the evidence that we received so far, we
12 understand that you were not a planner. What we're trying to understand is who asked
13 you to come speak. And it sounds like for the Michigan rally -- did you say two in
14 Lansing, one in Detroit? Is that correct? Or was it the inverse?

15 A I said it could be one or the other. I mean, I could easily find that out for
16 you. But right now, I don't remember.

17 Q The location -- there was a total of three in Michigan, and the location for
18 Lansing and Detroit. That's correct?

19 A I believe that is correct.

20 Q And the individual who asked you was Mr. Ali Alexander?

21 A Yes. Yes.

22 Q That is the extent of your knowledge?

23 A Yes, sir.

24 Q Okay. And they -- at least one of them occurred at the State capital, to
25 your recollection?

1 A I am going to tell you, yes -- I'm almost positive.

2 Q Okay.

3 A I'm almost positive.

4 Q So your understanding, what was the purpose of these rallies in Michigan?

5 A Well, again, it was to kind of keep people's spirits and momentum up about
6 insisting that the State legislators conduct a thorough forensic audit of the particular
7 irregularities that were concerning people.

8 Q Did you all -- did you, in particular, receive any talking points about what to
9 talk about in Michigan?

10 A I don't recall. I don't think so.

11 Q Okay. Did anyone coordinate with you about messaging about specific
12 points to hit hard in Michigan?

13 A I don't recall. It could have happened, but I don't recall. I mean, that
14 seems like something I would ask. I probably -- you know, I do a lot of events on many
15 different topics and many -- and usually, when I go to a specific area to speak to a -- you
16 know, we're all one big United States. But the issues that affect people in Iowa are
17 different than the issues that affect people in New York.

18 And so usually if I'm going to speak somewhere, I like to have some basic
19 understanding of how my message can be specifically targeted to a specific audience.
20 So though I don't remember. It's entirely likely that I reached out to someone and said,
21 like, what are the points I can hit on Michigan.

22 Q Do you recall reaching out to anyone from the White House about these
23 talking points?

24 A I don't know if I would call it the White House, but I do have a couple of
25 contacts that -- let me think of what they're called. Basically, it's -- I can't think of what

1 the -- like the name of the department is. But they send out -- they regularly send out
2 like once a week -- oh it's called Pundit Prep. And this went on for years, long before the
3 election. It's just kind of like a network within the White House where they'll send out
4 bullet points for pundits on every issue under the sun. So it's usually 3 or 4 pages.

5 And it's -- you know, they're talking about immigration, they're talking about gas
6 prices, they're talking about -- it's bullet points on every issue so that if you end up doing
7 a media interview, you can reference kind of the White House bullet points of what's
8 going on in the world.

9 And so, I don't recall, but it's possible that I reached out to the person who sends
10 me those bullet points and said could you send me any materials you guys have about
11 election issues.

12 Q So we didn't see any of that produced. Do you still think you have that in
13 your possession?

14 A If it exists, I probably do. I'm not even saying it did happen. I'm just
15 saying if I reached out to someone, that's what I would have done.

16 Q Gotcha. So, Mr. Barr, I just would like to know -- we'll probably follow up
17 with you afterwards to make sure Mr. Straka searches for any reach-out he might have had
18 to anyone at the White House or the campaign. It looks like Pundit talking points.

19 A Yeah.

20 Q I want to be sure those get produced.

21 A Sure.

22 Q So I will follow up with you, Mr. Barr.

23 Do you recall talking with any congressional Members about your messaging for
24 Michigan, or even I'll expand it, local State politicians in Michigan?

25 A I don't.

1 Q Okay.

2 A I don't.

3 Q Were you paid for speaking in Michigan?

4 A No.

5 Q Were your logistics -- not logistics. Was your travel and housing
6 engagements paid for for your travel?

7 A No. I paid.

8 Q Okay. Do you remember approximately when you were in Michigan for
9 these rallies?

10 A I would estimate that it would have been around like November 8th through
11 the 10th.

12 Q Okay. So you were in Michigan, then, November 8th through the 10th
13 before the November 14th rally in Washington, D.C. with Mr. Ali Alexander and the
14 Kremers?

15 A Correct.

16 Q Okay. Did you have personal security for your appearances in Michigan?

17 A I have to believe I did.

18 Q I guess, if you remember, who did you use or who did you typically use for
19 personal security?

20 A So we typically use the same security company almost every time I do an
21 appearance or an event or anything. I think we provided that information to you. I'm
22 not even remembering right now the name of the company. I would have to assume
23 that we probably hired one or two people to escort me through that company. It's a
24 company that has private security agents in every State.

25 Q Got it. And, look, I'm not out on the campaign trail or even on the

1 advocating trail like you are. Can you just help us understand why you felt the need to
2 have protection?

3 A Sure. Well, first of all, it's not just protection. Honestly, I would say that
4 the primary purpose of my security is to keep me on schedule. So getting from point A
5 to point B and keeping on time is the primary focus of my security escort. Because most
6 people who follow politics, particularly conservative politics, know who I am. I am, with
7 all modesty, I'm pretty well liked, and I have a very sweet fan base.

8 And so for me to be able to get from my car to a stage to speak, I'm likely going to
9 have to encounter dozens or more people who want to stop me for a picture. And
10 having a gigantic person dressed in a suit going like this kind of helps me get from point A
11 to point B.

12 Now, there have been a couple of times throughout the years where I have done
13 events and counter protesters have showed up and acted up significantly, and I've had to
14 have someone step in and, you know, put a wall between me and someone. But I would
15 say primarily the purpose of my security is to keep me on time.

16 Q Okay. While you were in Michigan, did you witness any violence at any of
17 your events?

18 A None.

19 Q And it sounds like, I just want to make sure I put a button on this, that you
20 left Michigan around, approximately, and I know it might not be the exact date, but,
21 approximately, November 10th?

22 A I'd say that's pretty accurate.

23 Q Okay. And so that takes us then to the Washington, D.C., rally on
24 November 14th. How did you come about speaking at the November 14th rally in
25 Washington, D.C.?

1 A I don't think I did.

2 Q Did you attend that rally in D.C. on November 14th?

3 A Yes.

4 Q Okay. Did you speak -- you didn't speak at the Supreme Court or at
5 Freedom Plaza?

6 A No, no, that is where the conflict with the Kremers had already kind of
7 kicked in.

8 Q Okay.

9 A So I got -- I was not welcomed to be a part of that event.

10 Q Okay. So you just came to support the event, but didn't speak?

11 A Yeah, and like I said, I like to attend events and document and shoot footage,
12 and do interviews, and things like that. So, I mean, I would have gone anyway. But,
13 yeah, I think at one time I was probably going to be a part of it, and then I was not a part
14 of it.

15 Q Do you have the footage that you documented from the November 14th
16 event?

17 A I would have to look. Well, and the FBI took all of my hard drives and
18 thumb drives and devices, and things like that. So I could look through my phone, but
19 I'm not sure.

20 Q Okay. I'll follow up with Mr. Barr about that.

21 So then just help us understand. It sounds like you came to support and to
22 document. How long were you in Washington, D.C., for the November 14th rally?

23 A Well, I would have to believe it was a quick trip. You know, I would have to
24 go back and look, but I can't imagine that I would have stayed more than 3 days.

25 Q And when you came to D.C. that time, where did you stay?

1 A I would guess that I either stayed at the Marriott, or that I stayed at -- there
2 was a hotel that I liked staying at at the time. Oh, oh, God. I feel like it was called the
3 like the Hamilton, or something. I could look it up. But it would have -- I assume it
4 would have either been the Marriott, or something called like the Hamilton, or
5 something.

6 Q No, that's good enough. Thank you.

7 A Sure.

8 Q Did you use anyone to, I guess, coordinate your travel logistic, or did you do
9 that on your own?

10 A Well, I did it on my own.

11 Q Okay. Did you have personal security while you were in D.C.?

12 A Again, I'm going to assume that I did because I usually do. I don't -- but you
13 know what? I don't -- there are things that I remember about that day because I -- I was
14 inside the speaker tent for a small period of time, and I don't -- maybe I didn't. I
15 don't -- I don't recall having security on that day. It doesn't mean I didn't, but I don't
16 remember it.

17 Q Okay. While you were in D.C., did you witness any violence?

18 A No.

19 Q And --

20 A Well -- I'm sorry. No, I don't think I did, but I remember -- if I recall
21 correctly, that was when a lot of people were getting attacked going home from the
22 event and --

23 Q Yeah, I get that. I'm asking did you witness any violence?

24 A I don't think so.

25 Q Okay. And did you come to D.C. for the December 12th rally?

1 A Okay. So this question has already been asked to me several -- I don't
2 know. Like, I had a session with the FBI over the last year, and they were asking me
3 about the November event and the December event, and I started getting really confused
4 because I didn't remember that there were two different events.

5 I am going to tell you I don't think I was because I only recall being in D.C. for one
6 event, and then being in D.C. for January 5th and 6th. I don't recall being in D.C. three
7 times between the election and January 6th. And -- I'm going to tell you I don't think so
8 because I don't remember -- yeah, I don't remember that.

9 Q Okay. Can we pull up exhibit 3? And this might actually relate to some of
10 the Pundit points you were talking about earlier.

11 A Okay.

12 Q And can we zoom out a little bit?

13 I'll give you time to review this because this is not a document that you produced
14 to us. So it looks like it's a Giuliani Presidential Legal Defense Team Strategic
15 Communications Plan.

16 A Uh-huh.

17 Q And let's just scroll slowly so that Mr. Straka can become familiar with the
18 document.

19 A Oh, well, I see a misspelling, but okay.

20 Q I'll actually go to the part that directly is relevant to you, and if you need to
21 see other parts of the document, we can go there. Let's go to page 16. Do you recall
22 seeing this document actually, by the way, before I even get there?

23 A No.

24 Q Okay. And it looks like you are listed as a medium social media. And I am
25 assuming that SM stands for social media conservative influencer.

1 A Okay.

2 Q It was compiled by Christos Makridis, M-a-k-r-i-d-i-s, and Soula Parassids,
3 P-a-r-a-s-s-i-d-s. Do you recognize these names?

4 A What was the first name again?

5 Q It's right here on the top of the document.

6 A Okay.

7 Q Christos Makridis?

8 A No. Then no.

9 Q Okay. And do you recognize Soula Parassids?

10 A No.

11 Q And you don't recall receiving this document from my Giuliani
12 communications plan?

13 A No.

14 Q Okay. Thank you. We can take that down.

15 I'll open it up and see if any other professional staff members have any questions
16 before we move into January 5th and 6th.

17 Okay. So let's move to January 5th and 6th and those rallies in particular. I
18 understand that you are in Georgia doing events before the Senate runoff. Like how did
19 the rallies on January 5th and 6th first come on your radar?

20 A I don't honestly remember if I first heard about it from like Ali, or if I first
21 heard about it because President Trump tweeted out for everyone to come to D.C. on
22 January 6th. If my memory is correct, I think that the conversation was circulating
23 within that group of people I was communicating with.

24 So I believe it was like Ali said, we're doing another event -- or another event is
25 happening in D.C. on January 6th, and it's going to be, you know, kind of the same -- in

1 fact, I kind of remember Ali saying, you know, like it's important that at this time that
2 people put their personal difference aside and, you know, just get a -- there's been this
3 conflict with the Kremers, but we all need to work together.

4 And so I feel like the conversation was sort of like there was going to be this event
5 that the Kremers were doing, and then it was going to be a March, and then another
6 event at the Capitol where dozens of people would be speaking. And if my memory is
7 correct, that type of conversation took place, and then shortly after that President Trump
8 said on Twitter for everyone to come to D.C. on January 6th. And it all kind of happened
9 within a short period of time.

10 Q That's really helpful. So you recall a conversation of some sort with Mr.
11 Alexander shortly before but close in time to President Trump's tweet on December 19th
12 about the protests on January 6th?

13 A I would say that's -- I mean, that's what I remember.

14 Q Thank you. That's helpful. And so it sounds like Mr. Alexander brought
15 you into the fold for January 6th -- I'm not going to say planning, because I know we've
16 heard -- we've discussed that word a lot today, organizing versus planning --

17 A Yeah.

18 Q -- brought you into the fold for potentially speaking at rallies on January 5th
19 and/or 6th.

20 A I believe it was Ali who brought that to my attention.

21 Q Okay. Back at this time -- you have alluded to this a little bit, but I want to
22 make sure it's clear. So in this time I'm assuming mid December, heading into late
23 December, who did you understand was organizing the rallies on January 6th?

24 A All I can tell you is that I felt like my point person was Ali, and I didn't
25 really -- I mean, I guess I would feel bad throwing Ali under the bus in saying that I

1 thought he was an organizer because I didn't know if he was an organizer or not.

2 Again, he was kind of relaying information. And at this point more than
3 50 percent of the time, I was questioning the validity of the information that I was
4 receiving. And what I mean specifically by that is that I felt like there was a lot of kind
5 of, you know, oh, I talked to the White House, and I spoke to the White House. And
6 I -- you know, and I was kind of going, okay, sure. And all I really cared about was
7 finding out what time am I supposed to show up, and where am I supposed to be to
8 speak.

9 Q I guess how would it be throwing Mr. Alexander under the bus by saying he
10 is an organizer?

11 A Well, because I feel like the implication here is that he bears a direct
12 responsibility for the violence that took place on that day, whether it be through
13 organization or through negligence. And I don't know that. I truly do not know that.

14 Q Well, are you getting this from like news reports? I guess, I am just trying
15 to understand the basis of that opinion. Is that from news reports?

16 A I'm sorry, can you say it again?

17 Q Is the basis of your information that Mr. Alexander would be blamed, so to
18 speak, for this event, is that coming from news reports, or where are you getting that
19 from?

20 A Well, I think that's a fair statement. I mean, there does seem to be I feel
21 like a lot of focus on pointing a finger at him. And -- look, I'm not friends with Ali
22 Alexander. I'm not -- we had a temporary working relationship at best.

23 But I look around at what I feel like is happening, and I feel kind of bad, because I
24 don't really have any awareness -- certainly, he has said and done things where I was like,
25 oh, okay. But I don't have any awareness that this man had any intention of doing

1 anything other than wanting to be a part of a peaceful demonstration.

2 And so, yeah, it concerns me to provide information that could be construed as,
3 you know, kind of a pile-on when -- well, maybe I'll just stay out of that.

4 All I can tell you is that I don't really truly know. I don't truly know if I would
5 consider him to be an organizer of the January 6th event, or if he was passing along
6 information to speakers from somebody else who was organizing.

7 Q What did you expect that the rally on January 6th was going to be at this
8 time? And I'll add an extra detail. Did you know that the President was going to speak
9 at this rally when you first learned about it?

10 A Are you talking about at the Capitol.

11 Q I'm talking about at -- so at the Capitol or at the Ellipse, was it your
12 understanding that President Trump was speaking on January 6th?

13 A Oh, yes. Before I got there, at some point, it had been made clear to me
14 that the President would be speaking at the Ellipse, or that was the plan. And then,
15 again, there was this constant back and forth and back and forth of details changing.
16 And I am certain that at several points, I was told he may or may not be speaking at the
17 Capitol.

18 And I remember sitting at the Ellipse, listening to him speak, and being surprised
19 when he said, I'll be joining you. And I was like, cool. Okay, because to me that was
20 the first confirmation that I got that he was planning to go to the Capitol and be a part of
21 the speeches that were happening, going -- supposed to happen at the Capitol.

22 Q Were you tracking or aware of any congressional Members that were going
23 to be speaking at the Capitol and/or the Ellipse?

24 A I wasn't tracking, or anything like that. But I -- you know, again, there were
25 speaker graphics that were created. One had me on it as well. And the -- I couldn't

1 even tell you who -- well, probably a couple I could tell you. But I -- there were graphics
2 that were created, and I think some of the graphics had Members of Congress who -- it
3 said that they were going to speak. But, no, it's not something I was tracking.

4 Q And this is like more of a big picture kind of question. What was the
5 purpose, from your understanding, of what the January 6th rally or rallies were going to
6 be?

7 A So the conversations that had been taking place leading up to January 6th
8 was that there was going to be an emphasis put on -- well, people were speculating about
9 whether or not Mike Pence might call for a 10-day reprieve from the certification of the
10 electors, and that during that time the forensic audit would be call for.

11 So my understanding was always that that was a possibility, not a guarantee, and
12 that should that happen, that the idea was that we -- we're going to call for a very
13 thorough auditing, forensic audit of the votes. And whatever the results of that audit
14 produced, that's the way things would be.

15 So, like, I personally don't know one single person who didn't say if we forensically
16 audit the vote, and the tallies are accurate or close to accurate, or show clearly that Joe
17 Biden got the number of votes that he did, or that Trump got the number of votes that he
18 did, or that it doesn't change the ultimate outcome one way or another, then that's it.
19 You know, and I have always been a big proponent of the idea that knowledge is power.

20 So I want to know what I'm dealing with. If the person I was supporting lost the
21 election, or the person that I didn't want to win the election did win the election, that's
22 life. I mean, that's fine. That's not the end of the world. But I want to know,
23 because, to me, it's like I want to have the information necessary to get out there and
24 start making a change going forward. Going into 2022, 2024, I want to be a part of
25 trying to sway public opinion that there are better choices for people.

1 So, you know, perhaps a forensic audit might have been done, and it turned out
2 that Joe Biden got more votes than we thought that he got. I want to know that too. I
3 want to know the information as accurately as possible so that I can go out there and try
4 to, you know -- in my opinion, wake people up and get people to think differently than
5 they're currently thinking.

6 But I felt, and I think most people felt that we didn't truly know for sure what the
7 actual accurate outcome of the election was.

8 Q So January 6th was -- the rally that you were attending was directly related
9 to the certification of the electoral college that was going to be held on January 6th?

10 A Well, again, what I would say is that the conversations that were taking
11 place, or that it was possible that Mike Pence might -- I am using the word reprieve. I
12 don't know if you want to use the word stay, if you want to use the word halt -- for
13 10 days to do a forensic audit and then resume the certification based off of the results of
14 the forensic audit.

15 Q So I think individual -- I think it was publicly known either the night before or
16 morning of January 6th that former Vice President Pence was not going to -- he was just
17 going to do a ceremonial role. I guess, how did that impact your decision to go to the
18 rally at the Ellipse, and then go to the Capitol?

19 A That was not known to me, and I don't think it was known -- well, I can't
20 speak for other people. But what you just said is news to me. And, in fact, the first
21 awareness that I had to the contrary was that I got an alert of a tweet that President
22 Trump put out after he spoke at the Ellipse saying that we -- I'm paraphrasing a bit. It
23 said something like, we are hearing that Mike Pence does not plan to call for a 10-day,
24 you know, delay of the certification. And that was the first awareness that I had. If it
25 were even true, which I -- I'm sure I assumed it was. But that was the first awareness

1 that I had. And that was -- you know, I was almost to the Capitol at that point when that
2 tweet came out on my way to do my speaking engagement.

3 Q So when did you actually arrive in Washington, D.C.?

4 A I think I arrived on the night of the 4th.

5 Q And you were coming Georgia, that's correct?

6 A Yes.

7 Q And where did you stay?

8 A At the Willard Hotel.

9 Q Now, we understand that other "stop the steal" influencers and members
10 stayed at the J.W. Marriott. I guess, why did you stay at the Willard?

11 A I don't know. Um, I don't know.

12 Q Did you coordinate personal security for your trip to Washington, D.C.?

13 A Yes.

14 Q Were you provided additional security by Mr. Alexander?

15 A No -- no, I mean not in any formal way. If that existed, I wasn't really aware
16 of it.

17 Q Okay.

18 A The only reason I say that is that I've been made aware of like text messages
19 or things where people were saying, you know, we have a group of people who are
20 looking out for us, or we have a group of people, whatever. That was not like a formal
21 arrangement that I had with anybody. But I did have a formal arrangement with my two
22 hired private security agents.

23 Q Okay. Can we pull up -- and I think this is what you are alluding to. Can
24 we pull up exhibit 5 and go to page 10. These are text messages with you and Michael
25 Coudrey.

1 A Okay.

2 Q So it looks like we are on -- are we on page 10? Okay.

3 If you go separate, try to be there by 1:00, and come to the -- 1 p.m. and come to
4 the speaker's area. If walking, we have 24 security personnel who will escort us in a
5 group.

6 Did you ever see this security personnel.

7 A No.

8 Q Were you aware that the security personnel were Oath Keepers?

9 A No.

10 Q You had never heard Mr. Ali Alexander or Mr. Coudrey mention that they
11 were obtaining security from Oath Keepers?

12 A I don't think so. But, again, I think it's important for you to understand too
13 I wasn't really -- and I'm not saying this in an effort to distance myself from them, but it
14 just happens to be a fact. I was kind of doing my own thing in D.C. So like I already
15 had my own private security hired, I wasn't travel -- well, like, we weren't traveling as a
16 pack. You know what I mean? Like I wasn't following around Ali and Michael, or
17 anything like -- like I was traveling on my own. And so a lot of that, I guess, I wasn't
18 really following.

19 Q Okay. We can take this down. So we also understand that you are on the
20 VIP list for the Ellipse events. How did you get on that list?

21 A It's my understanding that that's something that Ali or Michael arranged.
22 That being said, I already have my own personal contact with a person who is like one of
23 the top point people at planning every Trump rally. And so every Trump rally that I've
24 attended for years, I have contacted her, and she always treats me very well. So I had
25 already contacted her. And as a matter of fact, I ended up -- I ended up having a much

1 better seat on my own than the people who were on like the "stop the steal" VIP list.

2 Q Who was this individual that you had a relationship with?

3 A Her name, I can't think of her last name, but it's Crystal. It's like a -- kind of
4 a Middle Eastern last name like Mundoze or -- her first name is Crystal.

5 Q Okay. And do you recall who she worked with specifically?

6 A Well, I think she worked for the Trump campaign.

7 Q For the Trump campaign. Got it. Okay.

8 A I think so.

9 Q And so you reached out to this individual, and you got, it sounds like, better
10 seats than what "stop the steal" individuals had organized or coordinated for you?

11 A I'm just saying that I have a nice relationship with her, and I know that she
12 thinks very highly of me, and she has always treated they really well. So I do feel -- I
13 mean, she put me like front and center that day, which was really nice. So.

14 Q I don't recall seeing these documents or communications in your production.

15 So I will follow up with you, Mr. Barr, about that to make sure Mr. Straka, if he has
16 them, produces them.

17 So were you sitting near Mr. Alexander and other "stop the steal" folks at the
18 Ellipse?

19 A I mean, I saw him, and I saw other people, but I wouldn't really say if sitting
20 near because I -- there were certainly several rows between -- if I remember correctly, I
21 think there were three sections. You know like, left, center, and right. I was in the
22 center. I didn't really pay attention, but I don't know if they were in the center or not.
23 My recollection is almost that they were either on the left or the right, and maybe
24 somewhere around like the 7th or 8th row. That's how I remember.

25 Scott Presler came to me and asked if he could sit beside me, and he ended up

1 sitting to my right. And that was -- that was it.

2 Q So walk us through your morning. You're at the Willard. Actually, let's go
3 back to the 5th. I jumped ahead of myself. Let's go back to the 5th. Did you speak at
4 any rallies on the 5th?

5 A I did. I spoke in Freedom Plaza.

6 Q Okay. Who contacted you to speak at the Freedom Plaza event on
7 January 5th?

8 A So that would have been Cindy Chafian, I think is her name?

9 Q Did she contact you directly or through Mr. Alexander?

10 A I think Ali introduced us, and then Cindy and I started speaking one on one.

11 Q Were you all speaking over the phone or via next or email?

12 A Probably both. Not email. I don't think email. I don't recall emailing
13 anybody through this whole thing. Like I really don't think I've had a single email
14 exchange. But I would imagine that we did text and talk on the phone.

15 Q Did you search for messages from Ms. Chafian to produce to us pursuant to
16 the subpoena?

17 A I think so.

18 Q Okay.

19 A Yeah, and I know that I provided -- I'm positive I provided them.

20 Q To Ms. Chafian?

21 A I think so.

22 Q Okay. Mr. Barr, I will follow up with you about that as well.

23 Just so Ms. Chafian, approximately, when did you she reach out to you about
24 speaking on January 5th?

25 A It would have been in -- within the first week of January.

1 Q And what did you understand the event on January 5th to be compared to
2 the events on January 6th?

3 A I just -- I knew it to be a big rally in Freedom Plaza. So Cindy was present at
4 the event that had taken place on Freedom Plaza, excuse me, in November which was
5 hosted by Women For America First. And so it was my understanding that this was
6 going to be the same type of thing, basically, the exact same setup.

7 So she just said that she -- well, she told me that she was working together with
8 several different groups. I remember there being a lot of talk of religious groups, like
9 Christian groups, and that she was going to provide time for me and several other people
10 to speak. And so, I think I had a phone conversation with her, and she, you know, said,
11 you know, show up around 3 o'clock, and you can go on stage and speak for 5 minutes, or
12 whatever.

13 Q I guess, how did that event go off? What was your reaction or thoughts of
14 how the Freedom Plaza event went on January 5th?

15 A Fine. I thought it was good. It was pretty well-attended. It was pretty
16 well-coordinated. I remember it started to rain while I was speaking. But, yeah, no,
17 I -- and I didn't stay long. I showed up shortly before my speech, and I think I left almost
18 immediately after my speech.

19 Q I guess why didn't you stay?

20 A Because I was -- I would imagine if I were to go back and look at my life, I
21 was probably exhausted. I had been working my tail off in Georgia for a month, and the
22 decision to go to D.C. was a pretty last-minute one. I had jumped on a late flight. I got
23 into D.C. late on the 4th. I was tired. I was just tired. Like I was just exhausted.
24 And so, I guess, I would imagine if I had to try to remember, I probably showed up, did my
25 speech, went back to my hotel, put my pajamas on, and got back into bed.

1 Q Got it. Did you go to the Virginia Women For Trump event at the Supreme
2 Court on January 5th?

3 A No. Oh, wait, I'm sorry. What was the question?

4 Q I mean, there was an event at the Supreme Court on January 5th as well.
5 Did you speak at that one?

6 A I'm not even sure if I knew that. I can guarantee you I didn't speak at it,
7 and I'm pretty sure I didn't attend it. So, yeah.

8 Q Yeah. If you didn't attend, you can just say it. We're just asking the
9 questions.

10 A Yeah.

11 Q Did you see Mr. Roger Stone with any of your "stop the steal" influencers or
12 colleagues on January 5th or 6th?

13 A I'm going to say definitely not on the 6th. And I have been trying to
14 remember, because I have been asked this question before about the 5th. I honestly
15 don't remember if I saw him in the speaker tent or not. You know what, I feel almost
16 confident saying that I didn't. Because if I did, I probably would have gone over to him,
17 talked to him, and maybe snapped a picture or something, and that didn't happen. So if
18 I saw him, it would have been like incredibly briefly in the speaker tent on the 5th, but I
19 don't think I did.

20 Q Do you recall --

21 A I don't think I saw him those 2 days.

22 Q In the phone call that we talked about earlier, do you recall Mr. Stone ever
23 joining calls with you and Mr. Alexander and other "stop the steal" influencers?

24 A I remember him being on one call.

25 Q Well, how do you remember him being on one call? What was the

1 significance? Or how did that pop out in your mind?

2 A Because he spoke for a minute. It was one of those group calls, and he
3 jumped on and said a few words. And it wasn't -- it was neither here nor there. I
4 mean, he certainly didn't say anything that had to do with like planning or logistics or
5 anything like that. I just remember him giving kind of a few-minute talk about things
6 that he's gone through and ways that he's felt targeted by the government, you know,
7 kind of unfairly targeted. And I'm paraphrasing, but I think kind of just expressing that
8 he felt proud of people for, you know, standing up for what they believe in, and that kind
9 of thing.

10 Q So on a planning call for January 6th, he was discussing kind of what he had
11 been through. I guess I am trying to understand how that even comes up.

12 A Well, I can tell you that going forward, I will be talking to people about what
13 I've gone through in the last year, and so it makes perfect sense to me. I mean, I think
14 that he was just saying that, that -- my impression of what he was saying is that he felt
15 like he had been treated unfairly many times because of who he is. And I think that was
16 it. I think he just wanted to express that he was proud of people for standing up, and
17 that he knows that it can be hard to stand up because you can be treated poorly or
18 unfairly if you do.

19 Q I know we talked about December already, but do you recall going to a
20 Jericho march, specifically, in D.C. in December?

21 A I don't.

22 Q We also -- well, we have looked at your phone records, and we noticed that
23 you placed calls to Senator McConnell, Mitch McConnell's office three times on January
24 1st. You called twice to his D.C. office and once to his Kentucky office. Do you recall
25 making these phone calls?

1 A No.

2 Q Okay. So you don't remember calling Senator McConnell's office at all on
3 the new year?

4 A No.

5 Q Okay. Is it possible somebody else could have taken your phone and called
6 Senator McConnell?

7 A Very unlikely. I am going to look into what you're talking about because
8 that doesn't make any sense to me, but no.

9 Q Okay.

10 A Oh. I wonder if -- I am going to go back and look. I am going to do a little
11 research. I wonder if that was something where I was telling people on a massive scale,
12 which is to say, addressing my following and saying, you know, contact these Senators
13 and tell them how you feel about blah, blah, blah. So, sorry.

14 Q I am not objecting on January 6th, possibly. That was around the time
15 that -- look, I have read the messages around the time where individuals in "stop the
16 steal" are talking about various Senators who may object to the certification of the vote.
17 Could your calls to Senator McConnell's office been related to that?

18 A I would imagine that my calls were as a citizen calling a Senator. I got
19 confused when you said that because my assumption was that you were saying that like
20 I -- like I have a personal relationship with Mitch McConnell. And I was, like, saying, hey,
21 I'm coming to D.C.

22 Q I never said that. I just asked why you called his office.

23 A I never said you said that. I was just saying that that was my assumption
24 based off of what you said. But what I'm saying is that now that you're saying that my
25 recollection is probably that I was calling a United States Senator as an American citizen,

1 that's probably what that was.

2 Q And as a United States citizen calling a United States Senator, what were you
3 calling him about?

4 A I can't remember. But I would imagine it was to express my grievances
5 with how I felt like the election was being handled.

6 Q So on the morning of January 6th, I guess, like what time did you wake up,
7 and where did you go? Did you go anywhere before the Ellipse, or did you just go
8 straight to the Ellipse?

9 A Hard to remember, but I feel like I probably went straight to the Ellipse.
10 Oh, oh, wait, I'm sorry, on January 6th. I'm sorry, I got mixed up on the time.

11 Q Sorry, I jumped straight to January 6th. I went back and now I am back on
12 January 6th.

13 A No, no, no, that's okay. I thought you were talking about the 5th and
14 Freedom Plaza. No, definitely, I went straight to the Ellipse because it was so early. I
15 think we had to get up at like 4:30 in the morning or something. And I remember it was
16 still dark out while walking. So, yeah, it was very early and walked to Ellipse.

17 Q Can we pull up exhibit 15, and this is again the "stop the steal" leadership
18 Twitter group chat. Can we go to page 58?

19 So on this document it looks like Mr. Alex Bruesewitz, it looks he is directly
20 addressing Representative Gosar and says quote, unquote, "Paul, did you coordinate with
21 all the other Members?" This is at 6:18 a.m. And we can scroll up to show this is a
22 6:18 a.m. on January 6th.

23 So can we scroll up a little bit just to show Mr. Straka this is January 6th.

24 So look right here, January 6th, 2021. And then the next page. So Mr.
25 Bruesewitz asked Representative Gosar, Did you coordinate with all the other Members?

1 It appears Mr. Gosar is saying, As best as possible.

2 What coordination was going on here?

3 A No idea.

4 Q No idea? Okay.

5 A No.

6 Q You can take it down.

7 When did you arrive at the Ellipse again? You kind of mentioned this earlier.

8 And when did you arrive approximately -- and this is approximately. I know it's hard to
9 remember exactly what time you arrived somewhere?

10 A I think that I probably arrived around 6:30 in the morning.

11 Q And how long did you stay at the rally at the Ellipse?

12 A Well, the drawback to having such a good seat was that I was one of the last
13 people to be able to leave the grounds. So -- and it was very cold. So I think -- I think I
14 did not leave the Ellipse until 1:30 p.m. on -- maybe even later, but I --

15 Q Do you save all the speeches?

16 A Yes.

17 Q Okay. Do you recall Mr. Ali Alexander leaving early?

18 A I do.

19 Q Do you know why he left early?

20 A I guess it was my assumption that he wanted to get there and familiarize
21 himself with whatever the layout was going to be of the next event. I mean, that just
22 sort of made sense to me that he was going to go and then probably -- an assumption, be
23 able to message us and say, hey, there's a lot of people over here, or this road is blocked,
24 but, you know, come up this way -- you know, just to go early to be able to provide
25 logistical information to people.

1 Q When did you become aware that individuals were attempting to breach the
2 Capitol on January 6th?

3 A I started getting some messages on my phone, I would estimate around
4 between -- I would guess around 2 p.m., maybe a little later -- or I don't know, around
5 2 p.m. eastern, and it was from people who were at home, like, watching on television,
6 and that they were saying that they were seeing or hearing in the news that people were
7 going inside.

1

2 [12:11 p.m.]

3

BY MR. [REDACTED]

4

Q So the people, and based upon our chronology, this violence starts around

5

12:56-ish. You weren't tracking this until 2 p.m.?

6

A Correct.

7

Q Okay. So you stayed for all of President Trump's speech. I guess, what

8

were your thoughts about his speech that day?

9

A I thought it was a little disappointing because it felt like a typical rally or

10

campaign speech, and it didn't feel to me like anything new or inter -- or relevant was

11

really being revealed. I remember kind of having a sensation of, like, Wait, like, we all

12

came here, like, kind of under this expectation that we were going to be told something

13

that was kind of new or relevant, and it didn't feel like that happened.

14

Q So we've heard from other witnesses that when they went to the Ellipse

15

rally, they were expecting -- and I think this is what you're alluding to -- somewhat of a big

16

reveal from the President. Is that fair to say that you were kind of expecting the same

17

during his speech?

18

A Kind of, yeah.

19

Q Yeah. A big reveal related to the election integrity issues that were alleged

20

from November?

21

A Yes.

22

Q Got it. Okay. And I think you mentioned this earlier, but I want to make

23

sure we button it up. You were -- during President Trump's speech, you thought there

24

was a chance he might actually join individuals at the Capitol afterwards?

25

A Well, he said -- I think he said, I'll be there, or I'll see you there. And, so,

1 yeah, I took that to mean, Oh, wow, he's going to come. And I mean, obviously if he's
2 going to come, I don't think he's going to stand out in the crowd. So I -- to me, I was,
3 like, Wow, you know, I thought maybe there's a chance I'll encounter him backstage or,
4 you know, get a picture or a handshake or something. So, yeah, I was kind of, like,
5 Wow.

6 Q But you were thinking you might see him at the event that was planned -- or
7 the event that Mr. Ali Alexander had asked you to speak at, at the Capitol after the Ellipse
8 rally?

9 A I thought that was possible, yes.

10 Q Okay. And so also the morning of January 6th, it was your understanding
11 that the plan for the events was, individuals would go to the Ellipse for the morning rally,
12 and then they would go to the Capitol building for the afternoon rallies?

13 A Right.

14 Q Okay. And the plan was always for there to be, like, a march in between,
15 correct?

16 A That was my understanding.

17 Q So walk us, then, through when you leave the Ellipse to how you arrive at
18 the Capitol. I believe you took the Metro, it's been briefed, I've read your briefings, I've
19 read the government briefings --

20 A Yeah.

21 Q -- so I'm tracking it. But in your own words, explain to us how you got from
22 the Ellipse to the Capitol?

23 A So like I said, it took a very long time for me to be able to exit the Grounds.
24 If I recall correctly, I made several attempts to get out, and I couldn't. Because
25 the -- like, 99 percent of the crowd was all exiting through the same exit. I tried that at

1 first, and realized I was never going to be able to get out of there.

2 And I did believe that I had a pending speaking engagement, like, that was -- I
3 didn't want to miss it. So I was trying to figure out another way to get out, and
4 somehow I did. I don't -- I remember I didn't go out the main exit, but I somehow found
5 a way out kind of behind the stage or something like that.

6 So I finally was able to get out, and I believe I went back to my hotel, got a cup of
7 coffee, saw a couple of friends kind of either outside the hotel or in the lobby. We went
8 in, we got a coffee together, we talked for a few minutes.

9 If I recall correctly, that's where my security, the two agents that I had hired, met
10 me at the hotel. I think that's right. I remember the agents that I hired telling me that
11 I couldn't do the march, and I was really disappointed about that, because I love doing
12 marches and I love just being around the people.

13 But they said there's too many people, and you're never going to be able to get
14 there on time, and so you can't. And I was really disappointed. So they told me I had
15 to take the Metro. So we went down, we got on the Metro.

16 I remember that the -- I don't know the D.C. Metro well, like, I don't know what
17 the normal stop patterns are, but I do recall that -- or at least someone telling me that
18 there's typically a stop that stops near the Capitol, and that that stop was not happening
19 on that day.

20 So I remember we went one stop past the Capitol to whatever the next stop is,
21 and that's why it ended up being, like, an 18-minute walk from where we were to the east
22 side of the Capitol where I showed up.

23 And it was around the time that we were arriving at the stop that I began getting
24 messages from people saying that they were hearing that people were going inside.

25 Q Got it. Actually, I want to backtrack a little. Do you know who a

1 Mr. Stephen Brown was -- or is, at the time?

2 A I don't think so.

3 Q Okay. And you mentioned this a little bit earlier, you weren't tracking an
4 organization called One Nation Under God?

5 A Uh-uh. I'm sorry. No.

6 Q It's okay. But you are aware now that this is the organization that
7 Mr. Alexander had filed his permit under, that name?

8 A I'm now aware of that, yeah. Yes.

9 Q What are your thoughts about that?

10 A To be honest with you, up until you just asked me that question, I've never
11 had a thought about it. Again, I don't believe -- I don't feel that I've ever had evidence
12 that Ali Alexander has ever tried to intentionally do something illegal or something
13 harmful. So when you asked me what do I think about that, my assumption is that there
14 must have been a good reason why he did it that was not something criminal. Because I
15 just have never been shown any evidence that he was ever attempting to do something
16 criminal or harmful.

17 Q Yeah. And that's not what we're saying at all. I guess this actually will be
18 helpful. As someone like yourself who has organized events on behalf of an
19 organization, as the leader of an organization, can you give me an example where you
20 ever filed for a permit under a name that wasn't WalkAway?

21 A I don't think I've ever done that, but if I had to make an assumption why
22 somebody would, I would guess it's because he was short on time. It takes time to get
23 permits. It generally does not happen in 24 hours or, you know -- and this was
24 happening fast, which, again, I think is further evidence that Ali was not as involved in
25 organization as he was presenting himself to be to many of us, which is, again, why I was

1 taking everything with a grain of salt.

2 But, you know, in the days leading up to January 6th, it was, you know, like, Oh,
3 I'm on the phone with the White House, I'm on the phone with the White House. And
4 then President Trump announces, you know, everyone come to D.C., whatever.

5 And my assumption is probably that Ali was trying to find a way for the people
6 who had been doing these events under the hashtag Stop the Steal, to be able to be a
7 part of speaking at this event. And in order to do that, he probably went under the
8 umbrella of somebody else who had already applied for a permit and --

9 Q So I can tell you with facts that -- so this is not -- so you're assuming this,
10 correct?

11 A I'm assuming that that would be an example of a reason why he would do
12 that.

13 Q Okay. Got you.

14 A Yeah.

15 Q But you can't think of an example where you ever filed a permit not under
16 the WalkAway name?

17 A I don't think so. No, I don't think so. Because we usually plan far in
18 advance. I mean, it's -- it's not super usual for us to just pop something up in, you know,
19 a minute.

20 Q So I guess if you could put a time, when did you become aware that rioters
21 were breaching the Capitol?

22 A Would you ask that question one more time?

23 Q If you could put a time on it, approximately, when did you become aware
24 that rioters were breaching the Capitol?

25 A Okay. That's a really hard question for me to answer because I approached

1 on the east side of the Capitol. I shot a video where my entire experience walking onto
2 the grounds and up to the steps of the east side is all on the video.

3 In my video, it's pretty evident that there were no police officers on the Capitol
4 Grounds, on the east side at the time that I arrived. The bike rack was completely open
5 on a very large -- excuse me -- a very large sidewalk.

6 So I walked up the sidewalk, into the Grounds, and as I approached the steps, in
7 my video, there's a man at the top of the steps, holding his hat in his hand and saying,
8 they've opened the doors, they're letting us in, they're letting us in. And then I walked
9 up to the top of the stairs, and I stood there and I filmed.

10 So, at the time that I was filming, I did not believe that the people I was filming
11 would be considered rioters breaching the Capitol. Now, I had -- I think that
12 somebody --

13 Q I'm going to stop you right there, and I want to hear. I also want you, while
14 you're explaining, to square it with this. So can we pull up exhibit 16 at page 14, please.

15 So this is the Stop the Steal Patriots group chat. And if you go to page 14, and
16 you scroll down a little bit, it looks like at 1:33 p.m., Michael Coudrey -- that's Michael
17 Tokes is Michael Coudrey, correct?

18 A Right.

19 Q He literally said, They stormed the capital, misspelled but, our event is on
20 delay. So I heard you just say that you had no idea that people were, like, breaching or
21 forcing their way in the Capitol. But it looks like Michael Coudrey informed the group
22 that they stormed the Capitol, not that people were let into the Capitol.

23 So I just want you to -- I'm trying to understand your explanation with this text
24 right here to your group.

25 A Well, I didn't see it.

1 Q You didn't see it?

2 A No.

3 Q Okay. Can you scroll down to page 15? So when you sent this text back
4 of -- Fuck no, I'm at the Capitol and just joined the breach. I just got gassed. Never felt
5 so fucking alive in my life -- you weren't tracking what Michael Coudrey had just
6 previously said?

7 A No, I wasn't. I -- the message that you're showing right there, I would have
8 to guess, was sent an hour and 15 minutes probably after he sent that message.

9 Q Okay.

10 A And also I would -- if I went back and checked the timeline of my day, he
11 probably sent that message while I was either on the Metro or trying to get out of the
12 Ellipse --

13 Q Okay.

14 A -- which is --

15 Q Well, let's break down your message back then. You didn't say I'm joining
16 the peaceful let-in to the Capitol. You're saying I joined the breach. That insinuates
17 some type of forceful entry. So help me understand that.

18 A Well, all I can tell you is that at the time, I certainly didn't believe that my
19 message would be scrutinized by investigators. So I had sent a message --

20 Q That's actually what gives it the probative value is because this is
21 said -- because you didn't think it would be scrutinized. So help us understand what you
22 meant by "breach."

23 A Sure. The message was directly indicative of my sense of humor. It was a
24 joke. In fact, if you, I think, depending -- I don't -- is that the message I provided you?

25 Q It is. So you're saying here that somebody was shot and killed is a joke?

1 A No, that's not what I'm saying. But, again, so you have to understand, too,
2 that when we were in this very large crowd of people, messages were not being -- they
3 weren't being sent quickly, and they weren't being received quickly. There was a lot of
4 jamming that was happening in messages, so people were reacting to things, but the
5 reactions were coming not in real time, and the messages were not going out in real time.

6 If you were to scroll down a little bit, I think you would see several people said LOL
7 or made a laughing Emoji about the comment that I made about hahaha, because people
8 know my sense of humor. And no one was saying hahaha because someone was shot
9 and killed. They were saying hahaha because they knew I was making a joke.

10 The message about me saying someone was shot and killed, I would -- I can't tell
11 you, but I would imagine they received that later.

12 Q So you're saying the hahaha from Michael Coudrey on the next page is
13 because your message of I just joined the breach was a joke. Is that what you're saying
14 here today?

15 A It was -- yeah, it -- it was a hyperbolic joke.

16 Q Okay. Thank you.

17 We can take that down.

18 Are you aware of any Stop the Steal members communicating with Congressional
19 Members during the January 6th breach?

20 A I'm not.

21 Q All right. And I showed it earlier in that Stop the Steal Twitter DM thread, it
22 looked like Representative Gosar was informing you all that the Capitol was on lockdown.
23 You don't remember seeing that in real time?

24 A Uh-uh. I'm sorry. No. No.

25 Q So you became -- I believe you said earlier you became aware shortly before,

1 or while you were on the Metro on your way to the Capitol, that there was a breach going
2 on. Why did you go still?

3 A Well, two reasons. First of all, I didn't know -- I didn't know the extent to
4 which anything was happening. So -- actually, let's go back a step before that. First of
5 all, I don't really take anything that I hear from the news at face value for a number of
6 reasons.

7 So I was not only not hearing this from the news, I was hearing this from
8 somebody who was telling me they were hearing it from the news. So it's -- so we've
9 now got several degrees of separation from a story that apparently is being put out in the
10 news.

11 I personally have experienced numerous times over the years the media grossly
12 misreporting incidents that are taking place at live events and things like that. So
13 number one, I didn't fully just automatically believe what I was being told.

14 But number two, it also didn't indicate to me whether or not this would have any
15 impact on the event that we were doing. And I didn't know if they were talking about
16 one or two people going inside, if they were talking about a dozen people or 6 people, or
17 if it was even really happening.

18 So the two reasons I proceeded forward were because, one, I hadn't been told by
19 anybody that I wasn't still speaking and that this event wasn't still happening, or that
20 whatever it was that was happening with this so-called breach was any significant big
21 deal.

22 And number two, if it were a significant and big deal, or something really unique
23 and unusual was taking place at the Capitol, that's exactly the kind of thing I would want
24 to document and show my audience and be able to document and conduct interviews
25 and get footage and be a part -- you know, be a part, you know, be a part of

1 documenting.

2 Q Can we pull up exhibit 16 on page 15, I guess. I just want to make sure you
3 weren't tracking these comments as you came up to the Capitol.

4 So I know you said that you did not see the message from Michael Coudrey at
5 1:33, saying, They stormed the capital, our event is on delay. Are you saying you also
6 didn't see the message where Michael Coudrey says, We are walking away from the
7 capital, Red flare just went up, I advise you to leave now?

8 A I did not. So I would tell you that --

9 Q Okay. That's -- so did -- but you did see, Yes, we are going back, correct?

10 A I'm not even sure if I saw -- well, so at the moment that I sent that message, I
11 would imagine that was the moment that I read all of the messages that I had missed.

12 Q Right. And then that's what you said, Fuck no -- and basically in response
13 to, we're going back, and you said, I'm at the Capitol. So I'm really not tracking your
14 answers today if you just use common sense and ways of the world of how this
15 conversation reads on paper.

16 A Well, what is confusing you?

17 Q You just said to me that you didn't realize what was going on at the Capitol,
18 but you have individuals in the Stop the Steal Patriots group saying that individuals
19 stormed the Capitol and we're walking away, in which you responded back, Fuck no. So
20 your answer doesn't make much sense, Mr. Straka.

21 A Well, no, because I had already, at this point, been on the east side Capitol
22 steps and witnessed people walking through the door. That had already taken place.

23 And then I walked down the steps after 8 minutes, went out on the outer grounds,
24 where my intention at that point was to begin interviewing people, which I did. I shot
25 13 videos interviewing people on the outer grounds. And that's when I started receiving

1 these messages and I gave that reply, which, again, was a hyperbolic joke.

2 Q Okay. So you never said to the group that you were at the Capitol to
3 conduct interviews, did you?

4 A I don't recall if I did, but I -- I don't remember doing that.

5 Q In these documents that you produced, you never said that you were at the
6 Capitol doing interviews. Instead you said you were joining the breach and that you had
7 never felt so fucking alive in your life. Is that correct?

8 A That's not correct. I said, I just joined the breach, and then I said -- I was
9 talking in the past tense.

10 Q Right. So that actually calls into question then, because you said you read
11 these messages after you had witnessed everything, almost alluding to there being time
12 that you're at the Capitol, you read these messages and then respond. But your
13 messages just said you just joined the breach. So this reads like you had just gotten to
14 the Capitol, right?

15 A No. It means I had just done something that is now over.

16 Q And the something was joining the breach, correct?

17 A The joke I made was joining the breach.

18 Q Thank you, Mr. Straka. We can take that exhibit down.

19 When you went to the Capitol, were you aware that Vice President Pence was not
20 going to, I guess, delay the vote in any sort of way?

21 A Well, as I said, I had just received a mess -- I had just seen a text message
22 from President Trump saying, if I recall correctly, Trump said, we are hearing that that is
23 what the situation is.

24 Q Okay. So what was your goal in going to the Capitol that day, or what was
25 your goal in still going to protest?

1 A Well, to speak. I mean, so -- that's a great question. I guess how would
2 that have changed the way my speech would've gone, I guess I probably would've -- first
3 of all, I didn't 100 percent know that that was true. That was just a tweet that had been
4 put out by President Trump. Although I think there's good reason to assume it would be
5 true. I guess it would change the context of my speech to one of disappointment rather
6 than hope.

7 Q You had previously promoted on your Twitter account that -- and I'm saying
8 we, I don't know who "we" means, but We cannot allow the transition to Biden under
9 these circumstances. Can you help us understand what you meant by this tweet? And
10 I can show it to you if that helps, but --

11 A I think I remember.

12 Q Yeah. What were you saying there, we cannot allow -- like, how can you
13 not allow the transition of power to another President?

14 A Well, you can't. I guess that's the point. These are messages that people
15 put out on social media because it's taking a firm stance on something. It's -- it's really
16 not that unusual. People on both sides of the aisle say things, like, we cannot allow
17 Republicans to put through their voter reform bill, it's racism. Okay? But I don't --

18 Q But there's actually -- but there's actually a way you can stop a bill from
19 going through. What were your expectations for stopping the transition of power on
20 January 6th?

21 A Well, the whole point, once again, was to conduct a forensic audit and just
22 to be certain -- I believe what I said was, if we don't know for certain what the outcome of
23 these irregularities are, this is not something that should proceed.

24 Q And then what about the tweet where you said, Make peace right now with
25 the fact that we are in a civil war. What is -- I guess, help us understand the civil nature

1 war of what you were saying.

2 A Well, I think that we live in a deeply divided country, and to the point where
3 people are not being truthful with -- about one another anymore, they're not being civil
4 with one another anymore. I think there's an enormous amount of cruelty and
5 dishonesty and hatred. And from what I've seen -- and again, I'm speaking as a former
6 Democrat and a former liberal up until just a few years ago. I, myself, used to hate
7 Republicans, and I hated Donald Trump.

8 But once I sort of went through that period of trying to better understand Donald
9 Trump, his policies, his supporters, their mind frame, I actually sort of fell in love with
10 these people, people who I once despised, and I started to see very clearly how badly
11 these people are treated. They're treated like they're garbage, they're treated like
12 they're -- they're treated like they're a waste of space in their own country, like they don't
13 matter, like their voices don't count. And I find that heartbreaking, so --

14 Q Okay. I guess what I'm trying to understand, civil war evokes very clear
15 images of violence, right? War, as we're seeing around the world right now, is not
16 peaceful. Were you thinking about these types of images when you were tweeting the
17 term "civil war" prior to January 6th?

18 A Not at all. And that, I actually disagree with your definition of civil war
19 entirely.

20 Q All right. What's your definition of civil war other than the actual civil war
21 that America had in the 1860s?

22 A Okay. Well, first of all, we're not living in the 1860s. But second of all, the
23 ways in which, I think warfare can be executed these days are things like banning people
24 on social media, banning people from the internet, banning people from being able to
25 have bank accounts, banning people from being able to use payment streams like PayPal,

1 Venmo, and Stripe -- by the way, all of these things have happened to me personally --

2 Q And you consider that civil war? You consider that civil war?

3 A Absolutely.

4 Q And I mean, if it's engendered or not, I'm not going to debate. I just
5 want -- so yes, okay.

6 A 100 percent.

7 Q Got it.

8 A Yeah, I think when -- I think that when people in power are preventing
9 people who don't have power from being able to send and receive funds, have bank
10 accounts, work, do their jobs. There are a number of people I know who have been
11 fired because of their political beliefs. Yes, I consider that to be civil warfare.

12 Q What about when you retweet an individual who said, We've been peaceful,
13 we're not going to be peaceful for much longer, are you talking about being removed
14 from Twitter as not going to be peaceful much longer, is that what you were alluding to at
15 this point? Or were you talking about, like, being violent?

16 A No, I have never advocated for violence.

17 Q Retweeting, We're not going to be peaceful much -- for much longer is not
18 advocating for violence in your opinion?

19 A Retweets should never be viewed as endorsements. They're sharing
20 information.

21 Q Okay.

22 A I have retweeted many tweets from the Black Lives Matter movement in
23 which people from that movement have talked about how they're going to burn cities
24 down to the ground, how they're going to go and do damage and destruction. That is
25 not me endorsing those statements from Black Lives Matter.

1 Q What did you take the Black Lives Matter tweets about burning -- that you
2 just allegedly said, burning down cities or whatever, what did you take that to mean?
3 Did you take it to mean that individuals were going to actually burn stuff down?

4 A Well, if someone says they're going to do it, then I think that that's
5 something that people should be made aware of, so, yes, I was sharing information.

6 Q Help me understand that thought with the thought of I'm tweeting, We're
7 not going to be peaceful for much longer, for not advocating violence. Those don't
8 seem to be compatible views.

9 A Again, it's sharing information. It's sharing information. So if
10 they're -- it's, like, sharing any other news story. If I shared -- if I shared a tweet or a
11 story today about Putin invading the Ukraine, that doesn't mean that I support Putin
12 invading the Ukraine. It's means I'm sharing information with my audience.

13 Q Got it. So when did you actually leave the Capitol on January 6th?

14 A I would estimate that I left the Capitol around 3:15 p.m.

15 Q Okay. And where did you go when you left the Capitol at 3:15 p.m.?

16 A Well, back to my hotel. I don't recall if I went directly back to my hotel. I
17 might've stopped and gotten a coffee or a bite to eat, but ultimately back to my hotel.

18 Q Did you see other members from Stop the Steal that night on January 6th?

19 A I don't think so.

20 Q Okay.

21 A I don't think so.

22 Q It looks like from your group chat, you all moved the messages from the,
23 looks like just the regular iPhone group chat to a Signal chat. Do you recall that?

24 A I recall it. I don't recall when it happened.

25 Q Did you join the Signal chat with Stop the Steal?

1 A Probably.

2 Q I'm assuming you don't have those messages anymore?

3 A No. And I did look for them, but I -- I don't even think they exist.

4 Q I guess, what was the purpose --

5 A I mean --

6 Q What was the purpose of moving from the group chat you were in to the
7 Signal chat?

8 A Well, I think that people were probably concerned because things had gone
9 so wrong at the Capitol that day, and I think that people were probably worried that that
10 might somehow reflect back on those of us who were going to speak.

11 Q So we've seen messages of individuals telling Mr. Alexander that
12 January 6th -- and I'm putting January 6th in a big kind of January 6th framework -- is
13 going to come down on him hard. Why would January 6th come down on
14 Mr. Alexander hard?

15 A Who said that? Are you able to tell me who said that?

16 Q No. It's just evidence on file.

17 A Oh. Then I guess I -- all I can do is speculate why this unknown person said
18 this. So I would -- my speculation is that somebody would feel that way because Ali had
19 put himself out -- first of all, he created an LLC, called Stop the Steal.

20 Secondly, he had, on social media, very much presented, portrayed himself as,
21 like, an official leader or point person in, you know, as a person putting these events
22 together or executing or being a point person on these events and -- I mean, the
23 comment makes sense to me, that --

24 Q Because of his rhetoric leading up to January 6th, like 1776 and not being
25 peaceful and things of that nature?

1 A So I stopped paying attention to a lot of the things Ali was posting several
2 weeks before January 6th. I may have even put his account on hide along with several
3 other people, because I was already getting annoyed and frustrated with the way that so
4 much of this was going down.

5 Q Can you help us understand a little more, I guess, what was frustrating you in
6 the messaging leading up to January 6th?

7 A What was frustrating me was how poorly handled I felt the entire process
8 was. And I'm talking about even things that had nothing to do with me or Stop the Steal
9 or anything else. I'm talking about conservative, high-profile personalities who were
10 making ridiculous statements publicly, that I felt like made everybody look stupid.

11 I'm talking about the fact that the President seemed -- at least according to his
12 Twitter account -- seemed to be kind of aligning himself with the Kremers, even though I
13 felt like the Kremers had not behaved very nicely to a lot of people. So that's why,
14 honestly, I decided to go to Georgia and start just putting more of my time and atten- -- I
15 could've spent the whole month of December running around doing more rallies, more
16 rallies for election integrity.

17 I started to divert my attention to the Georgia Senate runoff, because I was
18 becoming so frustrated with the election issue.

19 Q So you were becoming frustrated at the people receiving credit for
20 January 6th, not necessarily the messaging of January 6th?

21 A Oh, no, both.

22 Q So can you give me an example of the messaging that was frustrating you
23 leading up to January 6th?

24 A Constant talks of people releasing a Kraken, one very high-profile person was
25 saying that people in Georgia shouldn't vote, Republicans saying, you know, the system is

1 rigged, so, you know, basically protest by not even going out to vote, which is exactly the
2 opposite of what I was trying to accomplish in Georgia. Of course, there's very famously
3 a press conference in which a high-profile person had hair dye dripping down his face.
4 There were just a lot of things happening that were foolish and --

5 Q So I guess why would you mute Mr. Alexander at that point then? I don't
6 recall -- he was tweeting about January 6th and 1776. So what about him made you
7 want to mute him?

8 A That, again, I wasn't really -- I had reached a point where I wasn't really
9 believing a lot of the rhetoric about conversations with the White House and this -- things
10 like that. And I wanted, at that point, to use my time and my energy better by helping
11 to serve the people in Georgia with the upcoming election.

12 And so, I was beginning to pull away little bit from what we'd initially started with
13 doing these rallies and stuff, because I was starting to see the writing on the wall. I
14 didn't feel like it was going well. I didn't feel like anything -- I felt like it was getting kind
15 of embarrassing, to be honest, and just for my own mental state of mind.

16 And by the way, I do this with dozens of conservative influencers who have
17 nothing to do with January 6th or -- there are a number of people I follow, and I just get
18 frustrated with their message or what they're putting out. I don't want to take the kind
19 of extra step to unfollow them because I feel like that's kind of sending a message and
20 creating hostility. So I just put them on mute, because I'm not interested anymore in
21 hearing what they have to say.

22 Q So going back to January 6th and that evening when you all might've seen
23 each other, did you see other Stop the Steal folks that evening, or did you just go back to
24 your hotel alone?

25 A On the 6th?

1 Q Yes.

2 A So what happened on the 6th, this, I actually do remember pretty well. I
3 don't know if it was because of all of the people in town for the event, or because of the
4 violence that had happened at the Capitol, but it became impossible to get food. I
5 remember that.

6 And so a lot of people were trying to figure out where they could get like an Uber
7 Eats delivery or just go somewhere and get a bite to eat. And as it -- for some reason, as
8 it turned out, if I recall correctly, the Willard had a restaurant, and it was, like, the only
9 restaurant that was still serving food.

10 And so I remember a couple of people who -- I think Scott Presler and maybe one
11 or two other people -- reached out to me and said, can we come over to your room and
12 order room service, because he wasn't staying there. And I think I replied by saying, I'm
13 really tired, I don't want company, but if you want me to order food, you can come over
14 and pick it up, or something like that. And if I recall correctly, it didn't even happen.

15 But the only conversations that I recall having that night were with people trying
16 to get food, and I don't think that we ever ended up meeting up, or any sort of
17 transaction happened for people to get fed.

18 Q What was being discussed on Signal then? I mean, I did see discussions on
19 the regular chat about you all losing followers post January 6th --

20 A Yeah.

21 Q -- but what else was being discussed on the Signal chat?

22 A I can't remember anymore.

23 Q Was Ali Alexander, Mr. Alexander, was he nervous about what had
24 happened at the Capitol?

25 A I can't tell you if he was nervous or not. I mean, I just -- common sense

1 would indicate he probably was. I felt kind of nervous. I think everyone felt nervous.

2 Q When did you become aware that there was -- because you said earlier that
3 you didn't recall seeing violence at the Capitol -- when did you become aware that there
4 was violence at the Capitol?

5 A Well, the first thing, I guess, I would like to say is that I'm sure there are
6 many people who would define what I witnessed on the east side as violent. So the first
7 thing that I want to not do is try to classify the scene that I witnessed on the east side as,
8 like, absolutely no problem, you know, so --

9 Q No, that's very -- that's very fair of you, no. I really -- I appreciate that.
10 So --

11 A I want to be clear about that.

12 Q When did you become aware of, I guess, the violence that you would've
13 considered violence on that day with the mind-set you were in on January 6th? I'm
14 trying to clarify because I understand what you just said.

15 A No, I got you. So I'll just feel better if I clarify this point. When I'm
16 referring to violence, I'm talking about the images of people scaling walls, smashing
17 windows, like physically assaulting police officers, squeezing people into doorways, like
18 some pretty egregious stuff. And I was not aware of that until I went back to my hotel
19 room, and I had been in my hotel room for probably an hour and a half to 2 hours before I
20 saw images on the cable news of that.

21 So in this weird and unfortunate way, I feel like I was probably one of the last
22 people in the country to actually know that that had happened on the other side of the
23 building.

24 Q Okay. So you tweeted at 5:33 p.m. for patriots at the Capitol to hold the
25 line.

1 A Uh-huh.

2 Q What were you talking about, hold the line? Like, what line are they
3 supposed to hold?

4 A Right. Well, so when I left the Capitol, one of the last videos that I shot
5 was, I went out -- I kind of stood out toward the middle outer grounds, turned around
6 and took a shot, and there were thousands of people standing on the east side of the
7 Capitol, kind of up the steps and then out onto the Grounds.

8 And they were singing The Star-Spangled Banner. People were laughing. I
9 remember, there was a woman with a karaoke machine, and she was, like, playing, like,
10 disco music and singing songs. And I'm sure you won't appreciate this comment, but I
11 remember thinking to myself that it was kind of like a conservative Woodstock.

12 I mean, it was like, there were a lot of older people there in their 60s and older.
13 They were kind of just having a good time, you know, and, like, it was very peaceful.

14 And I also need you to understand, this was after when I stood on the east side
15 steps for 8 minutes, the doors were open, a man came out of the Capitol who I don't
16 know but I assume was a protester. He got on a bullhorn and he said, they have cleared
17 Congress, everyone went home, clear out, clear out.

18 At that moment, I turned around, I walked down the stairs, and that's when I
19 proceeded to shoot the videos that I shot.

20 So two things: One, whoever had gone inside the Capitol, which, again, I did not
21 see people breaking windows or, you know, beating the hell out of people. I didn't
22 witness any of that. And I thought that the breach was over, because that man came
23 out, told people to clear out. I thought people had walked through open doors, and
24 now they were saying don't do that anymore, we're done.

25 I stayed for another 20 or 30 minutes. I interviewed people, I shot videos, and

1 when I left, people were singing songs, and it felt like these people in their 60s were back
2 at Woodstock again.

3 And so the comment that I put out was saying, stay there, you know, rather than
4 making this, you know, like, oh well, it's getting late, let's go home, you know, I thought
5 about, you know, Occupy Wall Street went on for months, you know. And certainly I
6 wasn't suggesting that, but I was saying, stay there, you know, keep having a good time,
7 stay till tomorrow, like, let them know this means something to you. And honestly that
8 was it. It was -- it was my way of saying keep the protest going.

9 Q So when this man came out of the Capitol and said they cleared the Capitol,
10 you took that to mean they had cleared rioters out of the Capitol and not that the
11 congressional session had gone on a pause?

12 A I honestly didn't know what it meant. No, I didn't know.

13 Q Back even when you were at the Capitol, that the congressional session had
14 to be, you know, paused because of people breaking into the Capitol?

15 A Are you asking when I found that out?

16 Q I'm asking if you were aware while you were at the Capitol, or shortly
17 thereafter, that Congressional Members had to be escorted out of the Capitol.

18 A I don't remember when I found that out. It would make sense to me that I
19 found it out on the news, but I'm not 100 percent sure. And people might've been
20 talk- --

21 Q I guess, help me understand, what's the point of, like, you said Occupy Wall
22 Street. I know that's not a perfect example, and you even acknowledged that. What's
23 the point of just sitting at the Capitol for, if there's supposed to be a congressional session
24 going on? Is it to delay the session?

25 A No, no, no, no. No. No. I -- the whole point of, I think, was to show

1 people that this is how much people care about this issue. I don't think it sends a very
2 powerful message to show up for, you know, an hour or two. Obviously, the event that
3 was supposed to happen -- so, okay, if the event had happened, we would've been there
4 for hours, because there were, like, dozens of people scheduled to speak. I would
5 estimate at least three dozen.

6 That means that event would've gone on till probably 8 p.m., maybe even later
7 than that, with people speaking. Well, now, suddenly the event wasn't happening. It's
8 like -- like I said, 3:15 p.m. I was taking off at this point. And I was just saying, it
9 doesn't really send a very powerful message, I don't think, to go to the Capitol for, like, 2
10 hours, and then just be, like, Well, we're going home. It was my --

11 Q So on your mind -- on your mind on January 6th, you thought it was perfectly
12 fine to be on the Capitol steps protesting inside the Capitol?

13 A No. No, no, no. I didn't think that.

14 Q Okay. Because there had never been another example of that in history,
15 had there?

16 A Of people going inside a government building to protest?

17 Q Of walking into -- we're talking about the Capitol, Mr. Straka, you know
18 that -- walking into the Capitol to protest a congressional session.

19 A Why would --

20 Q Do you recall that happening before, do you recall peopling walking to the
21 Capitol before to protest a congressional session, like January 6th, do you recall that?

22 A That exact specific circumstance, no, I don't recall, but certainly I recall many
23 times that protesters have gone inside of government buildings or protested on the steps.

24 Q Okay.

25 A Yes.

1 Q So when you said hold the line, I just want to make sure we're clear on the
2 record, what did you mean by hold the line?

3 A As I said, to continue the First Amendment demonstration.

4 Q So you considered January 6th, after you had seen the violence and people
5 scaling the walls as just a First Amendment demonstration?

6 A No. I made that comment as I said before I knew that happened, and then
7 I took that comment down as soon as I saw that footage on the news.

8 Q So this tweet was at 5:33 p.m. You said you got -- you left around 3:15.
9 So at 5:33 p.m., you still were not aware that there was violence at the Capitol?

10 A No.

11 Q As you walked away from the east side of the Capitol, you didn't see anyone
12 scaling the walls on the west side of the Capitol or pushing through law enforcement on
13 the east side of the Capitol?

14 A No.

15 Q You didn't see any tear gas being deployed?

16 A There was one moment when I was on the east side of the building where,
17 for a split second, I felt that I had -- I would use the word "encountered" tear gas. And
18 the reason why is because I was standing there filming with my camera in my hand, you
19 know, like this, and I -- so I have never experienced tear gas before in my life.

20 And as I was kind of, you know, looking with my eyes and I had my camera like
21 this, I remember for a split second, everything in front of me going, like, it's as if my visual
22 became wavy for a second.

23 Q You had been tear-gassed, correct? You said it in the group chat.

24 A I think I said I just got gassed. Again, it was --

25 Q All right. So I guess I'm trying to figure out, how can you believe this was a

1 peaceful First Amendment demonstration but you're getting gassed?

2 A Right. Well, again, I was making a joke to my friends, and the reason why I
3 made that joke, I was just trying to explain to you, is because for a split second, I
4 saw -- everything kind of looked wavy for a moment, and I remember thinking to myself,
5 Is that gas?

6 And then I think someone around me began coughing or something, and I said,
7 Are you okay, and they said, Yeah. And I think at that moment, I said, they're spraying
8 gas, or, there's gas, or something like that.

9 Q Right. And so it's like, I'm getting away from the joke of the message, right,
10 you're seeing them spraying gas --

11 A No.

12 Q -- or you're seeing people come out -- you're seeing wavy images, and you
13 still think that while you were there it was a peaceful protest? And I'm just asking just
14 to understand.

15 A I understand, but I -- I didn't see the source of what I assumed was gas. So
16 it -- any person could have done that. I mean, you know full well that there apparently
17 were people there with bear spray. So I could've said they're spraying bear spray, but
18 that could've been a protester spraying bear spray. All I knew was that for a split
19 second, I felt like I was experiencing gas.

20 Q Yeah, I think it's fair to say, right, whether it was a protester spraying bear
21 spray or a Capitol Police officer spraying gas of some sort, neither one of those
22 circumstances are peaceful, are they?

23 A I really think it would depend on the context of the situation. Certainly, I
24 would not feel like it was peaceful to have somebody spray gas at me or to have
25 somebody spray bear spray at me. But I can tell you that I have seen that happen at a

1 number of protests over the years that were not considered to be an insurrection.

2 Q All right. When did you leave Washington, D.C., Mr. Straka?

3 A January 7th.

4 Q And what were your feelings, I guess, when you left on January 7th?

5 A Oh, I thought it was -- I'll use polite language -- I thought it was a disaster.

6 Q Why did you think it was a disaster?

7 A Because of what had happened. The -- so, again, the most egregious acts
8 that took place on that day, I witnessed on the news that night. So I left on January 7th
9 feeling like, number one, it was a complete waste of my time to come to Washington,
10 D.C. I didn't get to speak, I didn't get to do anything that I really wanted to do.
11 Obviously the situation didn't turn out favorably, and in addition to that, something
12 terrible has taken place that's going to turn into a PR nightmare, and I mean, that was
13 already starting to happen.

14 I remember being at the airport and, of course, CNN was on, and they were
15 starting to report on, you know, violence and people being killed and all this stuff, and I
16 was just, like, this is a disaster, this is a disaster.

17 Q Did you talk to Mr. Alexander after January 6th, like on the 7th or any other
18 time?

19 A I'm -- jeez, I'm sure I did, but I -- I don't recall.

20 Q Okay. And we're aware that you sat for interviews with the FBI --

21 A Uh-huh.

22 Q -- and DOJ. Is that correct?

23 A Yes.

24 Q When did they first come and reach out and speak to you?

25 A I sat down and spoke with them in February of 2021, for the first time.

1 Q And what was -- it was the FBI?

2 A Uh-huh. And --

3 Q Yes? That's a positive, right, positive response?

4 A Yes, yes.

5 Q And what did the FBI ask you about during that interview in February?

6 A Honestly, almost exactly the same questions you're asking, almost
7 identically. They wanted to know why was I there, who organized, list of names, who
8 are these people, what do they do. It was -- nothing you have asked me today feels any
9 different than what they asked me and vice versa. They didn't go down any roads with
10 me that are in any way different than you are.

11 Q Okay. So there was no topics that they asked you about that I might've
12 failed to bring up here today?

13 A No. Not that I can recall. I mean, it literally feels identical in every way.

14 Q And then it looks like you sat for, like, an interview with the DOJ after you
15 submitted your plea agreement. Is that correct?

16 A Yes.

17 Q What was -- so how was that interview different than your interviews with
18 the FBI?

19 A Okay. This is something I might need to talk with my lawyer about, only
20 because it pertains to something that has nothing to do with me criminally, but could
21 potentially put me in danger. So can I have a moment to talk to my attorney?

22 Mr. [REDACTED] Please. And let's just give you 5-minutes. Mr. Barr, does that
23 seem fair, 5 minutes?

24 Mr. Barr. Five minutes is good.

25 Mr. [REDACTED] Okay. And also before we go off the record, just know -- I know

1 you all are going to talk about it. We're also -- if we have to do, like, maybe an attorney
2 proffer after the fact and maybe talk confidentiality, that's something I'd be willing to talk
3 to you about, Mr. Barr.

4 Mr. Barr. Okay.

5 Mr. [REDACTED] All right. Thank you. We'll go off the record and come back on
6 at 1:05 p.m. Eastern Time, 12:05 p.m. Central Time.

7 [Discussion off the record.]

8 Mr. [REDACTED] We will go back on the record at 1:10 p.m. Eastern Time.

9 BY MR. [REDACTED]

10 Q So before the break, Mr. Straka, I believe the question I asked was, what was
11 the difference between your DOJ interview, that you had after entering your guilty plea,
12 with your FBI interview that you previously sat for?

13 A Okay. So I -- it had been brought to my attention by somebody on social
14 media who I don't know, a complete stranger, had essentially reached out to me to tell
15 me that they had identified somebody in a video who was at the Capitol who they
16 said -- this person told me that they identified a person who they said was a member of
17 antifa.

18 This person told me, I watched this person dressed entirely in black from head to
19 toe, and they said, then he went away for 10, 15 minutes or whatever, and he came back
20 dressed as a Trump supporter. And he was causing agitation, you know, et cetera.

21 I engaged in a conversation with this person, because the person said to me, I
22 have this on video, or something like that, and I said, Okay. So I looked at the video that
23 the person was talking about, just because it sounded interesting to me, and I was
24 shocked when I discovered that I recognized this person as being somebody who was
25 standing directly beside me in my video when I was on the Capitol steps.

1 Now, you know, I know for a fact that one of the crimes I'm -- I was accused of
2 committing was being in a restricted area. So this person had certainly committed the
3 same crime that I committed, and I was also very curious if this person might've been
4 encouraging the crowd in ways that it was alleged that I was encouraging the crowd.

5 And so, I asked this person if they knew the identity of this individual, and this
6 person said, Yes. And so he gave me the name of this individual. I googled this
7 individual and discovered that this individual has a violent criminal record.

8 At that point -- and -- and I also discovered that this person lives, coincidentally,
9 very close by where I live.

10 At that point, I had a conversation with my attorney, and I said I don't really know
11 what to do with this information. My attorney said, I think that we should turn it over to
12 the DOJ. I said, Okay, I'll let you make that decision on my behalf, and my attorney did
13 contact the DOJ.

14 The DOJ then asked me if they could extend my case for an additional 30 days to
15 meet with me again and discuss the information that I had, and they indicated to my
16 attorney that they might be willing to dismiss the charge against me, based off of the
17 information that I was providing.

18 So they provided a -- they filed a motion to the court saying that Mr. Straka is
19 expected to provide information that may result in a change to his sentencing
20 recommendation, which, of course, the media immediately turned into Trump ally,
21 Brandon Straka, expected to turn over significant information about January 6th.

22 In fact, I ended up meeting with the prosecution and the DOJ and providing the
23 information that I had discovered about this person with a violent criminal record that I
24 had been told had changed his clothes, and that it was speculated was a member of the
25 antifa organization.

1 This information didn't seem to be of much interest to DOJ and certainly did not
2 result in my case being dismissed.

3 And so, I guess if you have more probing questions about that, for my own
4 protection, I would have to consider how much further we go, but that was the basis of
5 the conversation.

6 Q Okay. So your conversations with DOJ or FBI, did they relate at all to the
7 Oath Keepers or Proud Boys?

8 A I was asked quest -- honestly not many, but I was asked a few questions
9 about my knowledge of or interactions with these organizations. And the conversations
10 didn't go very far because I've never really had relationships with these organizations.

11 Q So your follow-up with the continuance for 30 days, right, for you to sit with
12 this interview with the DOJ related to this one individual who was dressed in all black and
13 came back and was suspected to be antifa? That's what it was solely about?

14 A They asked me other questions, but that was what the meeting was initiated
15 about.

16 Q What were the other questions that DOJ asked you?

17 A Well, again, they were almost identical to what the questions you're asking.
18 They were questions like -- I mean, legitimately, were asking me questions, like, what did
19 you have for lunch, what did you have for dinner, did you see Roger Stone, did you see
20 Alex Jones, did you have dinner with the other Stop the Steal speakers, what do you know
21 about the Oath Keepers, what do you know about the Proud Boys. It was very broad
22 and -- yeah.

23 Q But the new information that I guess you provided in assistance to the DOJ
24 was about this one individual particularly?

25 A Correct.

1 Q You also -- did you produce documents and communications to the DOJ and
2 FBI, or did they seize them from you?

3 A They seized them from me.

4 Q And they still have it?

5 A Yes.

6 Q Okay. Do you know -- like, what did they take from you? What did they
7 seize from you?

8 A My computer, my phone, my iPad, hard drives, thumb drives, my camera,
9 clothing, my sunglasses --

10 Q Got you.

11 A -- you know.

12 Q And then you entered a guilty plea late last year, correct?

13 A Yes.

14 Q And you were recently sentenced, what, about 6 weeks ago or --

15 A Approximately.

16 Q Approximately. Okay. Did you ever -- and this is a specific, I don't want
17 you to tell me the substance -- did you ever testify before the grand jury?

18 A No.

19 Q Okay.

20 Mr. [REDACTED] Okay. Does any other professional staff members -- I believe it's
21 just [REDACTED] -- do you have any follow-up questions about anything?

22 All right. Mr. Straka, thank you for sitting with us for a little over 3 hours today.
23 We really appreciate it.

24 The Witness. Sure.

25 Mr. [REDACTED] It's through this type of testimony that we're able to accurately

1 learn of what happened on January 6th and the lead-up to January 6th. And it helps us
2 to actually be able to accurately write the report about the facts and circumstances of
3 that day.

4 And with that, we will go on recess. Thank you both.

5 [Whereupon, at 1:18 p.m., the deposition was recessed, subject to the call of the
6 Chair.]

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Certificate of Deponent/Interviewee

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

Witness Name

Date