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4	SELECT COMMITTEE TO INVESTIGATE THE
5	JANUARY 6TH ATTACK ON THE U.S. CAPITOL,
6	U.S. HOUSE OF REPRESENTATIVES,
7	WASHINGTON, D.C.
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11	DEPOSITION OF: JEFFREY LAWRENCE MORELOCK
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15	Wednesday, January 26, 2022
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17	Washington, D.C.
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20	The deposition in the above matter was held via Webex, commencing at 1:04 p.m
21	Present: Representatives Lofgren and Murphy.

1	Appearances:
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3	
4	For the SELECT COMMITTEE TO INVESTIGATE
5	THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:
6	
7	, INVESTIGATIVE COUNSEL
8	, RESEARCHER
9	, RESEARCHER
10	, INVESTIGATIVE COUNSEL
11	, INVESTIGATIVE COUNSEL
12	, PARLIAMENTARIAN
13	, INVESTIGATIVE COUNSEL
14	, INVESTIGATIVE COUNSEL
15	
16	
17	For the WITNESS:
18	
19	CHRISTOPHER RABBY

T				
2	Let's go on the record at 1:04.			
3	Good afternoon. This is a deposition of Mr. Jeff Morelock, conducted by the			
4	House Select Committee to Investigate the January 6th Attack on the United States			
5	Capitol pursuant to House Resolution 503.			
6	At this time I'd ask the witness to please state your full name and spell your last			
7	name for the record.			
8	The Witness. Jeffrey Lawrence Morelock, M-o-r-e-l-o-c-k.			
9	Thank you, Mr. Morelock.			
10	This will be a staff-led deposition, and members, of course, may choose to also ask			
11	questions.			
12	In the room with you here today you have, investigative counsel;			
13	, investigative counsel. You have, investigative counsel;			
14	, investigative counsel;, investigative counsel. Let's see,			
15	we also have, parliamentarian. We do not have any members in the room			
16	at this time.			
17	As individuals join, if they do join during this deposition, I'll be sure to introduce			
18	them for the record.			
19	Before we begin, I'd also like to describe a few ground rules for you. We will			
20	follow the House deposition rules that were provided to your counsel previously.			
21	Under the House deposition rules, counsel for other persons or government			
22	agencies may not attend, and you are permitted to have an attorney present.			
23	I would like to note for the record what has been previously marked as exhibit $oldsymbol{1}$ is			
24	the subpoena for Mr. Jeff Morelock, which is dated January 5th, 2022. You are here for			
25	this deposition pursuant to that subpoena.			

1	So at this time, could counsel please state their name for the record.
2	Mr. Rabby. Christopher Rabby here on behalf of Mr. Morelock.
3	. Mr. Rabby, can you please spell your last name for us just to make
4	sure we have it clear on the record?
5	Mr. <u>Rabby.</u> R-a-b-b-y.
6	Thank you.
7	There is an official reporter transcribing the record of this deposition. Please
8	wait until each question is completed before you begin your response, and we'll try to
9	wait until your response is complete before we ask our questions. The stenographer
10	cannot record nonverbal responses, such as shaking your head, so it is important that you
11	answer each question with an audible verbal response.
12	We ask that you provide complete answers based on your best recollection. If
13	the question is not clear, just ask one of us for clarification. And if you do not know the
14	answer, please just simply say that you don't know the answer.
15	You may only refuse to answer a question to preserve a privilege recognized by
16	the select committee. If you refuse to answer a question based on a privilege, staff may
17	either proceed with the deposition or seek a ruling from the chairman on the objection.
18	If the chairman overrules such an objection, you are required to answer the question.
19	I also, lastly, want to remind you that it is unlawful to deliberately provide false
20	information to Congress for this interview. Providing false information could result in
21	criminal penalties for perjury and/or false statements.
22	Do you understand that, Mr. Morelock?
23	The <u>Witness.</u> Yes, sir.
24	. Would you please stand and raise your right hand to be sworn.
25	The Reporter. Do you solemnly swear and affirm under the penalty of perjury

1	that the testimony you are about to give will be the truth, the whole truth, and nothing		
2	but the truth?		
3	The Witness. Yes, I do.		
4	. Thank you, Mr. Morelock. You can have a seat.		
5	Logistically, as we move throughout this afternoon, just let us know if you need		
6	any breaks or would like to discuss anything with your attorney. I know we're virtual.		
7	We'll operate as if we're in person. We'll go off camera, mute our mikes. You all can		
8	go talk and then come back whenever you're done with your conversation.		
9	Also, if you need comfort breaks, like if we're going for a little too long, just let us		
10	know. We'll break for about 10 minutes 5 to 10 minutes to give everyone a chance to		
11	go do whatever they have to do.		
12	There may be several people asking you questions today. If you don't		
13	understand a question, please simply ask one of us to repeat it. And we'll do our best to		
14	try to, you know, facilitate it so it's easy for you to know who's asking the questions so		
15	you can address them.		
16	Does that all make sense, Mr. Morelock?		
17	The Witness. Yes, sir.		
18	EXAMINATION		
19	BY ::		
20	Q All right. We'll start with some easy stuff. Can you just tell us, for		
21	example, how old you are, what city and State you currently live in?		
22	A I'm 55 years old. I live in Milton, Florida.		
23	Q And what's the highest level of education that you obtained, Mr. Morelock?		
24	A Some college and the police academy.		
25	Q Thank you for highlighting the police academy. We'll get in there a little		

1	later.	
2	V	/hat is your current occupation?
3	Д	I'm a real estate agent.
4	C	And where are you a real estate agent? In Florida where you live?
5	Д	Yes, sir.
6	C	Okay. Does your real estate practice, does it cover the whole State or just
7	certain r	egions?
8	Д	I'm licensed for the whole State, but I primarily work the Pensacola area.
9	C	And how long have you been a real estate agent?
LO	Д	Off and on since 2006.
l1	C	So you just mentioned some police academy. So I'm assuming you've bee
L2	a police	officer?
L3	Д	Yes, sir.
L4	C	When were you a police officer?
L5	Д	My first academy was in 1988, I graduated. I worked for 8 or 9 years, took
L6	a break,	worked private security. I had a private investigation and bodyguard company
L7	and ther	also real estate.
L8	C	Where did you go to the police academy? Was it like State police, local
19	police?	
20	Д	It was at, I guess, a community college in Bradenton, Florida.
21	C	And just give us a brief overview, I guess, of where you worked as a police
22	officer, v	hether the locality or whether it was State or Federal.
23	Д	Most of it was for a city agency, Gulfport Police in Pinellas County, Florida.
24	That's th	e Tampa Bay area. I worked there for about 9 years.

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

- 1 the State Department, United Nations, over in Kosovo. I spent 2 years over there as an 2 international police officer. When I got back, that's when I -- I didn't go right back into law enforcement. 3 in 2015 through, it was either 2017 or 2018, I don't remember for certain, I was a 4 volunteer State Trooper for the Florida Highway Patrol. That required me to go to a 5 320-hour, what they call an auxiliary officer. I didn't have full arrest powers, only -- you 6 7 know, I could make arrests if I was in the presence of another trooper. That makes sense. And so with this -- this sounds like an interesting 8 9 assignment over to Europe. Just, I guess, give us a little background about what duties 10 you performed during that assignment over there. 11 Α Basically, United Nations was responsible for law enforcement, so I worked 12 patrol. I did a little bit of war crimes investigation. I was on like a riot tactical response 13 team, and then I was chief of operations over like 60 international officers for the last part of it. 14 Q And where were you specifically? 15 Α Orahovac, Kosovo. 16 Q Kosovo, got it. 17 And then the last part, you said you had kind of your own private PI or security 18 19 company. Is that true? 20 Yes, sir. It's a -- in Florida it was a licensed private investigation. You're 21 also allowed to do bodyguard work. I tended to gravitate more towards the bodyguard side of it. 22
 - Q And just give us just, I guess, an overview of the types of folks you were providing bodyguard services for. Was it like politicians, celebrities, athletes?

24

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

- 1 much work there which, ultimately, is why I closed down.
- 2 Q Got it. And what were the years that you approximately were running this
- 3 company?
- 4 A I don't remember off the top of my head. I don't remember.
- 5 Q Okay. Was it -- and this is just me just trying to ballpark it. Was it like
- 6 after 2010, before 2010?
- 7 A Around 2010. Sorry.
- 8 Q Okay. So right in the middle. Okay.
- 9 A Yeah.
- 10 Q Thank you.
- 11 Were you also in the military? I didn't hear that, but were you also in the
- 12 military?
- 13 A No, sir.
- 14 Q Okay. No reserve duty or anything like that?
- 15 A No, sir.
- 16 Q Okay. So how did you get involved with the Oath Keepers? Just tell us
- about that, how you first got involved and what you did in the organization.
- 18 A I either saw a video on the internet or read an article on the internet. It
- was during the -- I think during the riots when they were in Minneapolis. I don't know
- the exact date. But I saw somewhere that they were asking for volunteers to help do
- security, not just in Minneapolis, but in other places that were having trouble. So they
- were asking for volunteers, former law enforcement, military, that would be willing to
- volunteer to do security at businesses during protests that either turned into a riot or the
- 24 potential for that was there.

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

1	А	Correct.
2	Q	Gotcha. So walk us through, then, kind of the process of getting affiliated
3	with the Oa	th Keepers. Like, for example, was there an application? Was there any
4	kind of trair	ning? What was that process like?
5	А	Initially, it was again, I don't remember the dates, but there was protests
6	and I guess	some rioting in Louisville, Kentucky.
7	Q	Yep.
8	А	I think it was right around the Breonna Taylor shooting incident time. So
9	that's the fi	rst contact I had with them, I think. I don't remember talking to them in the
10	past. But	I went on their website. There was a phone number to call. I left a
11	message, yo	ou know, just telling them who I was, and they had asked for, you know, a
12	brief I dor	n't know resume or verbal resume anyway. So, you know, I told them what
13	I just told yo	ou about my experience, and they called back and said, can you come up?
14	Q	I know this is probably the Hail Mary. Do you remember the phone
15	number or v	where you got that phone number from that you called?
16	А	No, sir. They when they do those types of I don't know they call
17	them call to	actions, they usually have a different phone number for each one.
18	Q	You recall who you spoke with when they called you back?
19	А	No, sir.
20	Q	Okay. Was and so did you join a chapter immediately? Like, did you
21	join a Florid	a chapter or was it just a national?
22	Α	Not immediately. They were just taking volunteers. So I went up there,

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

- 1 1 year.
- Q Okay. And the Louisville example is good because it helps me understand
- 3 probably how things were coordinated later on.
- Did anyone, like, tell you where to be in Louisville? Like, was there, like, an ops
- 5 plan before you went up there?
- 6 A They didn't -- they wouldn't release any kind of ops plan before you got up
- 7 there, so I just had to meet them. At first it was supposed to be in a hotel parking lot,
- 8 then it changed to some industrial parking lot.
- 9 Q Okay.
- 10 A And then I met a whole group of them.
- 11 Q And this was over the phone they gave you these directions --
- 12 A Yes, sir.
- 13 Q -- or was it over email?
- 14 A Yes, it was over the phone.
- 15 Q All right. And just for this Louisville example, approximately how many of
- you all were meeting, for example, in this parking lot before you all went to do your op?
- 17 A Just guessing, probably 20 of us, maybe 30.
- 18 Q You were from all over the country, not just from Florida?
- 19 A Yes, sir.
- 20 Q Got it. Because it was in response to like a national call to action?
- 21 A Correct.
- Q Got it. Okay. So you said there were \$50 annual dues for the Oath
- 23 Keepers?
- 24 A Yes, sir.
- 25 Q And are you still a member? It doesn't sound like it from just your -- by the

1	use of past tense.	
2	A No, sir. Within 2 or 3 days of January 6th, I sent them a message on their	
3	website telling them to cancel my membership immediately.	
4	Q We're probably jumping like a hundred steps ahead here, but why did you	
5	decide to leave after January 6th?	
6	A I just didn't want to be affiliated with anyone that, you know, may or may	
7	not have done anything illegal.	
8	. I'd like to note for the record that Ms. Zoe Lofgren has joined the	
9	deposition.	
10	BY Establishment :	
11	Q So going back, have you held any leadership roles in the Oath Keepers?	
12	A No, sir.	
13	Q Or even locally in the Florida chapters?	
14	A No, sir.	
15	Q And did you go through any training after like this initial Louisville thing in	
16	response to the Breonna Taylor protest? Did you go through any training to become a	
17	member of the chapter in Florida or anything like that?	
18	A No, sir.	
19	Q Did you all ever have any like gun trainings or gun discussions or maybe go to	
20	the rifle range together, anything like that?	
21	A There was some training in Florida, but I didn't attend any of it. A couple of	
22	times I had I don't know I guess you'd just call it target practice. Like in Louisiana,	
23	there was a big area where some of us were just shooting at targets, but it wasn't any	
24	kind of training.	
25	Q Okay. And how were these train not trainings. I would say how was	

	it it soullds like it was like a meet-up, right, to go shoot, similar to like law emorement		
2	and military folks. Is that about right?		
3	A No, sir. It was just, you know, before we would at least at that time it		
4	was just, you know, there was plenty of room, so it's like, hey, while we're waiting to go		
5	do something, let's just shoot. It wasn't let's meet here to shoot. It was we were		
6	there, there was a place where we could shoot, so some of us shot; some of us didn't.		
7	Q Just to like kill some time?		
8	A Exactly.		
9	Q Okay. And so there was no training regarding maneuvers or, for example,		
10	how to clear a building? I'm just thinking like traditional law enforcement or military		
11	trainings. Nothing like that?		
12	A I think I think that, you know, other chapters or that, you know, it might		
13	have happened in the Florida chapters, but I don't know who went. I didn't go. You		
14	know, I don't know where it was.		
15	Q And how were these trainings, the ones that you just kind of vaguely		
16	referenced, do you know how they were sent out to the group or how they were		
17	advertised to the group?		
18	A No, sir.		
19	Before I get into activities, is there anything does any other staff		
20	or Ms. Lofgren have any questions, any follow-up questions for Mr. Morelock?		
21	Okay.		
22	Oh, sorry.		
23	. Hi, Mr. Morelock. Are you familiar with any of the community		
24	preparedness teams or any of the community preparedness training?		
25	The Witness. I heard that that was something that they were going to try to		

1	start in Florida, but it never got started, at least not, you know, while I was a member.
2	Got it. So you never participated in any of those trainings?
3	The Witness. No, sir.
4	. Got it. Thank you.
5	BY ::
6	Q Okay. So now I want to talk a little bit about like the types of events or
7	activities that you all engaged in. I understand the Louisville example.
8	What events or activities or just explain to me what you did as an Oath Keeper
9	while you were in for about that year timeframe?
10	A In the Louisville when we went to Louisville, the first night we basically
11	stood on the roof of a pawn shop to make sure that nobody looted it.
12	The second night was across the street from that pawn shop, there was a gas
13	station that they had closed up that, I guess I don't know days or a week before
14	someone tried to set it on fire.
15	Q And during this Louisville example, were you all like working in coordination
16	with local law enforcement? Like, were you working with them?
17	A Yes, sir. There were usually it was a former law enforcement officer,
18	Oath Keeper, would be assigned as like a law enforcement liaison where he or she would
19	contact the whatever agency had jurisdiction, usually their intelligence detectives.
20	Q So you were almost act you were acting and correct me if I'm wrong ir
21	concert with local law enforcement, almost as like a force supplement? Were you
22	working with them? So it sounds like you were going where they
23	A We were cooperating with them, yes, sir.
24	Q Oh, sorry. I was talking over you. What did you say?
25	A I said we would cooperate with them. Like, in Louisville, some Oath

- 1 Keepers saw some people setting a car on fire, so they contacted law enforcement. I 2 think -- I think they were able to make an arrest on 2 or 3 people and put out the fire.
- Q Gotcha. Did you, as an Oath Keeper, provide personal security at any point? And I'm not talking about January 5th or 6th at this point. So let's actually go into like that summer of 2020, all the way up through like December, did you provide

personal security at all?

- A I don't -- I don't think I became involved with them until September or

 October maybe. In November, they asked for volunteers to do personal security for, I

 think it was an attorney that was assigned as a poll watcher in Detroit. So I did personal

 security then. I did personal security for -- again, they asked for volunteers -- for Roger

 Stone when he was in the Tampa Bay area. That's where I'm from. That's where my

 family was, so, you know, I volunteered to go down there.
- Q So let's break that up. So the Detroit -- so this was around the general election time or during early voting?
- 15 A It was, yes, I guess during the general election time because the person was 16 a poll watcher.
- Q And was this another response to a call to action or was this coming through your chapter?
- 19 A I think it might have been on a national chat, either through Signal -- they
 20 used a couple different apps. So I don't remember which one it was, but probably
 21 something like Signal.
- Q Okay. Is that how a lot of the opportunities came through was through
 Signal? Is that --
- 24 A They would usually, from what I remember -- I don't know if it happened all the time, but usually it was like cross-posted.

1 Q And what Signal channel, I guess, would you get this -- I've seen, for 2 example, the Florida Signal chats. Which one would these opportunities come in through? 3 4 I don't remember. There was Florida. There was national. You know, people would add me to chats that I wouldn't even ask to be added to -- I don't 5 6 know -- maybe just because of my experience, but I don't remember which one it was. 7 Q And when you were in Detroit, do you recall working with Michael Green or a Michael Simmons? I believe his call sign is Whiplash? 8 9 Α Oh, Whipit. 10 Q Whipit? No. Whip, yes. 11 Α Okay. So what was his involvement in the Detroit task? Q 12 13 Α He was doing personal security. I think he was, I guess you could call him the person that was in charge of that particular call to action. 14 15 Q And was Ms. Kellye SoRelle there too? Α Yes. 16 What was the nature of her role being in Detroit? 17 Q Α That was the person that needed protection, I guess. If I remember 18 19 correctly, it was -- someone was causing her or her group trouble. I think there was a 20 car window broken at one point, so that's what they needed people for. 21 How many of you all were providing security for Ms. SoRelle, if you recall, 22 approximately? 23 Α In Detroit, there were two of -- just myself and Mike, I guess, is his name. 24 Q Yes.

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

25

Α

1	was a problem, but I don't remember who they were or what their names were.	
2	Q	And how many days did you provide this security with Mike for Ms. SoRelle?
3	А	It lasted for, I think my part anyway, close to 10 days maybe.
4	Q	And were you paid for this job?
5	Α	No. My they reimbursed me for expenses, like the rental car, gas, food,
6	hotel.	
7	Q	Who reimbursed you? Was it Ms. SoRelle or the organization, the Oath
8	Keepers?	
9	А	It was Ms. SoRelle.
10		. Okay. Chris, we may follow up with you just to see if there's any
11	records of that after this, just to highlight that for you, okay?	
12	Mr.	Rabby. All right.
13		BY ::
14	Q	And then going back, you said so it was Detroit and then Mr. Stone in
15	Tampa, cor	rect? That's another time you did personal security?
16	А	It was in the Tampa Bay area. The actual city was Clearwater and, I believe
17	Pinellas Par	k.
18	Q	Got it. And was this an event that Mr. Stone was attending or was it just
19	А	No. He was giving a speech at both of them.
20	Q	Do you recall, was that before the election or after the election?
21	Α	After. It was in December.
22	Q	Okay. And just walk us through that. Like, how did that opportunity to
23	provide sec	urity for Mr. Stone come about, and then how long were you there, and then
24	what did yo	u do with Mr. Stone while you were with him?
25	А	Again, it was one of the chats where they asked for volunteers. The first

- one was at like a coffee shop called Conservative Grounds, I believe it was. So, basically,
- I kind of took it upon myself to do what they call an advance, is what I learned in my
- training, where you go out and look at the venue and just figure out routes to and from
- 4 the hotel. So I did that.
- That night, I think I went with maybe two Oath Keepers to pick Roger Stone up at his hotel, transported him to the venue, and then, you know, stood by the stage while he gave his speech.
- 8 Q So you all were not providing -- I've heard the term -- I guess there's like 9 event security and there's personal security. Were the Oath Keepers also doing event 10 security for this?
- 11 A Yeah. There were -- I don't remember how many -- maybe five to eight of
 12 them around the stage. I don't know if you would call that event security or -- I don't
 13 think we labeled them at that point.
- 14 Q Do you recall who put on this event?
- 15 A No, I don't.
- Q Okay. And so you got it through the chat. You picked up Mr. Stone.
- How long were you there with him? You might have said this. I'm sorry if I missed it.
- 18 A Just as long as it took him to give his speech, and then afterwards he did a
 19 book signing.
- Q Okay. So you picked him up from the airport, you were with him during the speech, and then with him during the book signing?
- A No, sir. We picked him up from the hotel.
- 23 Q Hotel. Okay. Got it, got it.
- Okay. One, I guess, overarching question I have. You mentioned that for Ms.
- 25 SoRelle, that she had a window broken out or something of that nature. Why was

1 security necessary for Mr. Stone in the Tampa Bay area, for example? 2 Α I don't know. You don't know. Okay. There was no justification put in the Signal chats 3 Q as to why you all had to provide personal security for these folks? 4 Α Not that I remember. 5 Okay. And you don't recall who was coordinating, meeting up with, for 6 Q example, Mr. Stone to provide personal security? 7 Α The Florida leader was kind of overall in charge of it, Kelly Meggs. 8 9 Q All right. 10 Α He wasn't there the first night, though. 11 Q Do you know if Mr. Meggs had a relationship with Mr. Stone at all? 12 did he know him personally? I don't know. Α 13 Do you know if anyone in the Florida chapter knew Mr. Stone personally? 14 Q I don't know. 15 Α Was Mr. Green -- was Mike with you during this time providing security --16 Q 17 Α No, sir. -- of Mr. Stone? He wasn't? Okay. 18 Q 19 Α No, sir. 20 Q Do you recall who was with you? Like, you said there were like eight folks 21 providing stage security, and you can --Α The first night Kelly Meggs' wife was there. I think her first name might be 22 23 Connie, but I'm not sure. Their son was there. I don't remember his name. I think it was either the first night or the second night an Oath Keeper named Joe from the, I don't

know, Sarasota area was there. There was another Oath Keeper, I don't remember his

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1 Maybe two other ones. name. 2 Thank you. That's helpful. Q So around this time period -- it sounds like this event was after what I'm about to 3 highlight for you. But in November, a couple of days before the rallies in D.C. on 4 5 November 14th, Mr. Stewart Rhodes told Alex Jones on Infowars that, quote, We have 6 men already stationed outside of D.C. as a nuclear option in case they attempt to remove 7 the President illegally, end quote, and that armed men were, in quotes, prepared to go in 8 if the President calls us up, end quote. 9 He also said that Oath Keepers had been doing recon for the past week prior to the November 14th rally in Washington, D.C. 10 It doesn't sound like you went to D.C. for the November 14th rally. Is that fair? 11 Is that correct? 12 Α I don't know the dates. When we were doing the -- I don't know -- you call 13 it the Kellye SoRelle call to action or detail, that was when I think there was a first, I think 14 15 they called it a Million MAGA March or something like that. It was the first one. 16 Q Yep. We did go to that. Α 17 Okay. Well, tell us about that. How did you -- how did it come about you 18 Q 19 going to D.C.? What, I guess, jobs did you perform in D.C.? Just tell us about that. 20 Α Again, I was just doing security for Ms. SoRelle. At that point, you know, 21 there was all the COVID thing, so there really wasn't anything going on real estatewise. 22 So I did have time, so, you know, I volunteered to go to D.C. 23 And it was just, again, where they walked with -- they being Kellye SoRelle -- I

don't know where -- let's see. It was Kellye SoRelle, myself, Mike or Whip, and then

there was another Oath Keeper that was kind of -- I don't know if he knew who Alex Jones

24

- 1 was, but somehow we ended up going on the march or the walk with Alex Jones, and
- 2 Kellye SoRelle, for whatever reason, wanted to walk with the crowd. I advised against it
- because it's so many people, but, you know, nobody listened to me.
- 4 So, you know, we went on that march. And then we were staying at somebody's
- 5 residence, I don't know who it was, in Virginia.
- 6 Q Okay. Was this march from Freedom Plaza over to the Supreme Court?
- 7 A Yes.
- 8 Q Okay. And was Mr. Rhodes not with you and Ms. SoRelle was, I guess,
- 9 separated from Mr. Rhodes at this point?
- 10 A Yeah. During the march I don't know what Stewart was doing.
- 11 Q Okay. And, I guess, just walk us through like that day. Did you see any
- threats? Did you think there was going to be any type of danger?
- 13 A No, sir.
- 14 Q Okay.
- 15 A It was peaceful.
- 16 Q And when did you get into D.C.? Did you, for example, engage in any type
- of advance work, like you mentioned before, for this rally?
- 18 A No.
- 19 Q Okay. And did -- do you know if anyone on your team, like Mike, for
- 20 example, engaging in any type of advance work?
- 21 A I don't think so.
- 22 Q Got it.
- 23 A Not that I know of.
- 24 Q And, approximately, how many Oath Keepers were there at this rally in
- 25 November with you?

1	А	I don't know for sure. 20, 30. I really don't know.
2	Q	And they were from all over the country again?
3	А	Yes, sir.
4	Q	And do you know anything about what we just what I just talked about
5	with Stewa	rt Rhodes saying about Oath Keepers planning to keep our men outside of D.C
6	in Novemb	er?
7	А	No.
8	Q	Did you know anything about that?
9	А	No, sir.
10	Q	There weren't any armed men on the Virginia side where you all were
11	staying?	
12	А	Not that I I mean, there were Oath Keepers there in Virginia. I don't
13	remember seeing any guns. Again, this was the first Million MAGA March I think it was	
14	called.	
15	Q	Yep.
16	А	You know, I know I you know, I had a gun with me, and we took target
17	practice.	Outside of this person's house, there's you know, on acreage in Virginia.
18	But I don't I don't remember seeing where any armed people were stationed or	
19	organized o	or anything like that.
20	Q	And you don't remember what part of Virginia this was in?
21	А	It was an hour, maybe an hour's drive from D.C. Which direction I couldn't
22	tell you.	
23	Q	Got it.
24		Does anyone have any follow-up to that, to the November rally?
25		BY STATE OF THE ST

- 1 Q There was another rally in D.C. in December. Did you attend this one as 2 well? Α No. I think that was the second one. But, no, I didn't go to that one. It 3 was right after -- there was an Atlanta one they asked me to go to too, but this 4 was after -- after the first one there was something going on in Atlanta. I just made an 5 6 excuse to leave because I was -- just kind of wanted to separate myself from everybody. 7 So I made up a story about having to go back to work and just kind of left and, you know, 8 at that point was just going to kind of fade away. 9 Q Sound like you'd been on the road with these folks for quite a bit, so just 10 wanted an excuse to get away. Is that fair? Α Yes. 11 Were you reimbursed for your travel and stuff to D.C.? 12 Q 13 Α The first -- for the first one, yeah. That's the reimbursement that Kellye SoRelle gave me. 14 15 Q Okay. So that reimbursement included Detroit and D.C.? Α Yes, sir. 16 Very good. So I'm not talking about January again, so the same time 17 Q period. It sounds like you provided security for Ms. SoRelle and Mr. Stone. I'm going 18 19 to go through a few other names to see if you provided security for them, just to be clear. 20 Α Okay. 21 Q Did you provide security for Mr. Ali Alexander --
- 25 Q Okay. So -- okay. Just the January 5th and 6th timeframe?

Just January 5th and 6th.

When did you provide security for him?

Α

Q

Α

22

23

24

Yes.

1 Α Yes. 2 Q What about Mr. Michael Flynn? Α No. 3 4 Q Okay. Mr. Alex Jones, did you provide it for him, or was he just kind of in 5 the vicinity? Α The first rally, he was in the vicinity, but we had nothing to do with his 6 7 security. 8 Q Did any other --9 Α At least I didn't. 10 Q Did any other Oath Keepers have anything to do with his security, that you know of? 11 Α Maybe the -- I think the guy's name was John. I think he was from Texas. 12 13 I don't know if he was doing security for Alex Jones, but, you know, he was with that 14 group when we met up with them, kind of right as the march started. Again, this was the first march. 15 Got it, got it. Okay. What about Mr. Ed Martin? 16 Α No. 17 Q Did you all provide any personal security or, I guess, walk with any 18 19 congressional members while you were in the November rally in D.C.? 20 Α Not that I know of or remember. 21 Okay. So let's put aside the Tampa Bay example. Were you involved in 22 any other election-related protests or events where you provided security in Florida? 23 Α No, sir. Do you know a Mr. Stephen Brown? Are you familiar with him? 24 Q 25 Α No, sir.

1	Q What about the Resource Media Group?
2	A No, sir.
3	Q Before January 2021, so before you provided the security for Mr. Ali
4	Alexander, were you familiar with Stop the Steal?
5	A No, sir. I don't think so.
6	Q All right.
7	A I had to google who Ali Alexander was. I had to google who Roger Stone
8	was. I've just never really been in politics.
9	Q That's actually where I was heading to next. I was going to ask, like, how
10	politically active were you before, you know, this December-January of 2020-2021
11	timeframe?
12	A Not very at all. I mean, I voted for Trump in the during the last election,
13	but when he was first elected, I didn't vote. And I vaguely remember, maybe I voted for
14	Bill Clinton back in the day, but that's it as far as I can remember.
15	Q So what led I know I heard about the George Floyd protest, and it
16	sounds like the Breonna Taylor protest in Louisville kind of got you involved with the Oath
17	Keepers. But what got you involved with wanting to provide security after the election?
18	A I just I like doing that. You know, if I could pick a job, you know, perhaps
19	should have instead of went into city law enforcement, went straight for the Secret
20	Service or something, but I didn't have the college. But I like doing that type of thing.
21	There wasn't a whole lot going on in real estate, and it was basically expense-paid trips to
22	you know, wherever they needed me.
23	Q Makes sense.
24	Any followup from any staff or from Ms. Lofgren?
25	?

1	BY:
2	Q Hi, Mr. Morelock. When you were providing security at the couple of
3	events that you mentioned, were you bringing your own equipment or was that being
4	supplied to you?
5	A It wasn't equipment really. You know, I do have a concealed weapons and
6	firearms license. I don't remember if I was carrying on those events or at those events
7	or not. But, you know, I was during all of these events I insisted on me just wearing
8	plain clothes.
9	Q Sure. So
10	A Let me clarify. On the personal security details, I insisted on plain clothes.
11	Q Got it. And in the Louisville event, were you bringing your own equipment?
12	A The Louisville equipment or, yeah, the equipment for Louisville, they
13	loaned me a bulletproof helmet, or they said it was bulletproof anyway, and then panels,
14	ballistic panels for a vest. I had a vest with, I guess they call it a carrier, but I didn't have
15	the panels.
16	Q Understood. Were the Oath Keeper supplying any other members of the
17	team with weapons or other equipment?
18	A I don't know if they had supplied anybody with weapons, but they had an
19	online equipment store where you could purchase, you know, different things, from
20	bumper stickers to, you know, ballistic vests and helmets. You know, they did loan gear
21	out.
22	At one point during the first D.C., I don't know, march or something, Stewart
23	Rhodes offered me a ballistic helmet. I guess he ordered it for me, but I never took
24	possession of it.

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

25

Q

1	website was?
2	A It was on the Oath Keepers website. I think there was a link to it.
3	Q Got it.
4	Ms. Lofgren?
5	Ms. Lofgren. Just curious. Why did you insist on wearing regular clothes as
6	opposed to some other kind of gear?
7	The Witness. It's there's really no need for all that stuff. You know, you don't
8	want to present a I don't know if hostile is the right word, but, you know, some Oath
9	Keepers believe that you should look macho and military like. But, you know, I and,
10	again, going back to, you know, some of my training is you just wear normal clothes
11	instead of drawing attention to yourself.
12	Ms. <u>Lofgren.</u> Thank you.
13	BY ::
14	Q Mr. Morelock, I have just a couple more questions.
15	So during the time between the election and January 6th, Stewart Rhodes was
16	pretty vocal about, you know, what he thought happened during the election and what
17	he thought needed to happen, including having Trump invoke the Insurrection Act and
18	warning that, you know, there would be a bloody conflict if that didn't happen.
19	Were you familiar with those his rhetoric during that time?
20	A Yes. I heard the I don't know if it was the podcast, or whatever it was,
21	and then he posted an open letter on the Oath Keepers website, asked everybody to read
22	it. But, again, I didn't even know what the Insurrection Act was. I had to google that.
23	Q Sure. Did you have a reaction at the time to his rhetoric?
24	A Yes. That's when I decided to just kind of distance myself from them.
25	Q Understood. Did you talk to other Oath Keepers members about that

1	rhetoric?
2	A I vaguely remember talking to the old Florida leader, not Kelly Meggs, but
3	another guy who stepped down. His name was Mike. I don't remember what his last
4	name was. But, you know, I just told him, I said, Hey, I think I'm gonna, you know, either
5	quit or distance myself. He said, That's fine. I don't blame you, you know, and then he
6	eventually did the same.
7	Understood. All right. I don't have any more questions.
8	Thanks, Marcus.
9	. Thank you.
10	BY ::
11	Q All right. So I want to hit on this quickly before we move on to the
12	January 5th and 6th kind of events.
13	I believe you've been interviewed by the FBI or DOJ, so can you just let us know
14	approximately when you were interviewed, if you can recall, and how many times?
15	The Witness. Do you have the dates of the
16	It can be approximate, like months, if you recall.
17	The <u>Witness.</u> July maybe.
18	Mr. Rabby. It was July 16, '21, Tallahassee.
19	Okay.
20	The Witness. That was the FBI interview.
21	And did you meet with the DOJ as well separately?
22	The <u>Witness.</u> Yes.
23	. And when was that?
24	The Witness. I don't remember the date. We're checking.
25	. No worries. Thank you.

1 Mr. Rabby. It was prior to September 15, the trip that he took --2 The Witness. Actually, it was up in D.C. Mr. Rabby. That's right. It was from -- it would have been around September 3 4 the 15th. 5 . Okay. Thank you. That's helpful. 6 And did you provide materials, documents, or any evidence in addition to your interview? 7 The Witness. Yes. 8 9 All right. And was it just one production? Do you recall? 10 The Witness. What do you mean by production? 11 Mr. Rabby. Meaning [inaudible] give it to them one time. 12 The Witness. Yes. Yes, one time. BY 13 And did it include like text messages, emails, Signal chats, all of that? 14 Q 15 Α No, sir. I didn't have any of that. When I went there, I gave the FBI, it was an itinerary -- I don't remember if it was a photograph of Ali Alexander's itinerary for 16 January 5th and 6th; I think a photograph of an Oath Keeper; and like a Special Forces 17 manual or something. 18 19 Q Do you still have those materials with you that you gave them? 20 Α No, sir. I deleted them. 21 You deleted them? Okay. Thank you. So I know we've touched on some of this, but I do want to understand kind of the 22 23 Florida chapter better because I think that will help us understand how January 5th and

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

6th and you going up to D.C. came about.

24

1	what chapter you were in in Florida, how it was organized, just help me understand it?
2	A I was in the Florida chapter. There were subgroups. I guess I was in
3	probably the Panhandle subgroup. Wasn't very active. I don't think there was more
4	than maybe four or five of us up here. I don't recall anybody's name other than their
5	handle or call sign, whatever you want to call it. One of them was Cat Daddy. The
6	other ones I can't remember right now.
7	Q Is Cat Daddy Mr. Stone, Aaron Stone?
8	A Not you mean Roger Stone or
9	Q No. I believe his name was Aaron Stone. But looking at
LO	A I don't know I don't know what his real name is.
l1	Q Okay. So he was in the Panhandle area as well?
L2	A I believe so. I'm not a hundred percent sure. Again, it was a lot of
L3	people would change their nicknames and things like that, so I just I've tried to forget
L4	all this stuff.
L5	Q So it wasn't like the military where you get a call sign and it stuck with you
16	for life. It wasn't like that at all?
L7	A Correct.
L8	Q Okay.
L9	Mr. Rabby. There was a lot of Gators too.
20	The Witness. Yeah. And there was a lot of Gators. People used Gator this,
21	Gator that.
22	BY BY
23	Q We'll go through that in a little bit, and I'll go through a lot of these call signs.
24	And if you remember who these individuals are, we'll go through it at that time.

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

- the Panhandle for Florida. It's correct that Mr. Meggs, Kelly Meggs, ran the Florida
- 2 chapter of Oath Keepers. Is that correct?
- 3 A Correct.
- 4 Q And were there like meetings? Were there like Zooms? How did you all
- 5 communicate or learn updates from Mr. Meggs?
- 6 A They would do conference calls on, again, one of the apps. I can't
- 7 remember. We used several.
- 8 Q Zello, for example?
- 9 A I'm sorry, I couldn't hear you.
- 10 Q Zello, for example?
- 11 A One more time?
- 12 Q Z-e-l-l-o, Zello?
- A Yeah, I think we used that, maybe WhatsApp and Signal maybe, or they
- would switch back and forth.
- 15 Q And approximately how frequently were these meetings held? Was it like
- 16 weekly, monthly or --
- 17 A I think they were weekly, usually.
- 18 Q How often would you attend the meetings?
- 19 A If I wasn't doing anything, I would usually attend weekly, but I did miss.
- 20 Q Of course. For life stuff, you missed a few.
- 21 A Right.
- 22 Q Do you know how many people, approximately, would be on each call?
- Were you able to see that?
- A No, I don't think so. Not that I remember.
- 25 Q Was there like an email distro list where you could see approximately how

1 many people or who was in the Florida chapters? 2 Α Not that I remember. 3 O And did your Florida chapter report directly to the national, with Mr. Rhodes, or was there like a region above that? 4 Α I don't know how that worked. 5 6 Q Speaking of Mr. Rhodes, what was, like, for example, your relationship or 7 your chapter's relationship with him? Did you hear from him frequently? What was 8 that like? 9 Α He would pop into the -- each State's calls, I guess, frequently. There was a 10 national call that he was usually on. I think that might have been weekly. I didn't attend all of those, but some of them. 11 12 Okay. What is your -- if you have it, do you have a current relationship with 13 Mr. Rhodes? And what is it, if you do? Α Not a current relationship, no. When we were doing the Kellye SoRelle call 14 15 to action, I drove him and Ms. SoRelle from, I think it was an Oath Keeper's house in North Carolina to D.C. So I spent, I don't know, 8, 10 hours in the car with him then. 16 You didn't ask about it, but we did meet -- let's see. I don't know, there's 17 probably 10, 15 Oath Keepers from North Carolina and Florida that did security at an 18 19 event called the Red Pill Expo. So they rented an Airbnb where everybody stayed, and 20 Stewart was in the house for those 2 or 3 -- I think it was 3 days at Jekyll Island. So, 21 yeah, I talked to him a little bit, but --22 Q And, I guess, just give us an overview. What was his demeanor, 23 personality, rhetoric like when you were talking to him when he's not putting stuff online, for example? 24

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

1	much political talk or anything like that. It was mainly, you know, we've got to keep
2	volunteering for security, you know, in case some of these protests get out of control.
3	So, you know, he seemed kind of dedicated to that. You know, kind of anti-Antifa talk, I
4	guess, but nothing about the elections or that kind of thing, that I remember anyway.
5	Q Did the Alex Jones Infowars thing that you just mentioned, did that catch yo
6	off guard having kind of talked to Stewart Rhodes a little bit?
7	A Yes, sir.
8	Q Okay. And I guess I think I know why. I'm just going to ask you anyway
9	and make sure. But why did it catch you off guard?
10	A Well, one, I didn't know what an Insurrection Act was, but, you know, again,
11	I really hadn't been into politics. And, you know, when I read up on the Insurrection Act
12	I didn't see how that could be a good thing for anybody.
13	Q I want to ask too, while I have you, about the Oath Keeper organization, if
14	you all had ever, for example, partnered or worked with I'm going to go through just a
15	bunch of organizations. And just let me know if, to your knowledge, you all had ever
16	partnered with them or worked with them.
17	The Proud Boys?
18	A I don't know if there was anything official, but the first Million MAGA March
19	or whatever it's called, they were also kind of surrounding they had like a group of thei
20	people that were surrounding Alex Jones. But as far as an official partnership or
21	anything like that, not that I know of.
22	Q So they were around. You didn't necessarily work with them, but they
23	were just around some of the same events you were providing protection for?
24	A Correct.

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

25

Q

1	how would	you describe that?
2	А	I mean, I don't recall anyone having any problems with them.
3	Q	Okay. Now, what about the Three Percenters?
4	А	I've just heard of them. You know, at one point I looked into joining them
5	but, you kn	ow, I decided not to, that I was just going to stick with the Oath Keepers.
6	Q	So you were looking to possibly, I know possibly, join them in addition to the
7	Oath Keepe	er membership?
8	А	Correct, or instead of the Oath Keepers, but they weren't really doing
9	anything.	
10	Q	I guess, what drew you to the Three Percenters?
11	А	Actually, what drew me away from the Three Percenters was they weren't
12	pro-law en	forcement or pro-ex-law enforcement. I forgot who I contacted, but the
13	person was	like, well, we really don't trust ex-cops and we really don't want ex-cops in
14	our ranks.	So, you know, I didn't look any further.
15	Q	Was that the Florida chapter of the Three Percenters that you had the call
16	with?	
17	А	I don't remember. There's several, from what I've read, several different
18	Three Perc	ent organizations. They're not all the same.
19	Q	Okay. And you don't remember like where you got the information from
20	the website	e for the one that you called?
21	А	Might have been Facebook, but I'm not sure.
22	Q	Got it. Okay. What about Vets for Trump or Veterans to Keep America
23	Great, any	involvement with them?
24	А	No, sir.
25	Q	Latinos for Trump?

1 Α I've heard of them, but --2 Q Didn't work with them? Α Correct. 3 Q What about Women for America First? 4 I think I heard of them, but I don't remember working for them. 5 Α How about --6 Q 7 Α I'm sorry. Let me correct something. The first Million MAGA March, 8 there was a women's group where there was like three or four of their speakers that 9 were kind of walking, you know, in conjunction with where, you know, Kellye SoRelle was 10 and with the Alex Jones group. So I don't know which group they were from, though, or 11 I don't remember. But there were three women, part of some women's group, but, again, I don't know what that name was or their names. 12 13 Q That makes sense. What about Turning Point USA? Α I don't think I've heard of them. 14 Southern Patriot Council? 15 Q Α No. 16 Mr. Nick Fuentes? Q 17 I don't know who that is, no. 18 Α 19 Q Mr. Patrick Casey, did you work with him at all? 20 Α No, sir. 21 Q What about the Georgia Three Percent Security Force, did you work with them? 22 23 Α No, sir. American Patriot Council? 24 Q

25

Α

No.

1	Q	American Phoenix Projects?
2	А	No.
3	Q	Okay. Thank you.
4		. Are there any others that I should cover that anyone had a
5	question ab	out?
6		. I'll just add to the list with a couple more.
7		BY :
8	Q	The Michigan Militia?
9	А	No, sir.
10	Q	The Wolverine Militia?
11	А	No, sir.
12	Q	And Mr. Ryan Kelley from Michigan?
13	А	No, it doesn't sound familiar.
14	Q	All right. Thank you.
15		BY ::
16	Q	Mr. Morelock, just a separate question. Earlier you had mentioned when
17	you disaffili	ated from the Oath Keepers that you spoke to somebody named Mike who
18	shared som	e of your sentiments and then later also disaffiliated.
19	Who	o was that? Do you recall his last name?
20	А	No, I don't. Before, I know he lived somewhere in the Jacksonville area.
21	He was the	leader before Kelly Meggs took over, and I think Kelly Meggs took over when
22	this Mike g	uy left.
23	Q	Is it Ostrel or Ostel (ph), by any chance?
24	А	I don't know.
25	Q	Okay. And then do you recall anybody else or did you know anybody else

1	that also disaffiliated?
2	A No, not that I know of, not that I remember anyway.
3	Q Okay. Thank you.
4	Hi, Mr. Morelock. I think I know the answer to this based on your
5	answers to the questions about the other groups so far, but I just want to make sure it's
6	on the record.
7	You don't remember Stewart Rhodes talking about any of those groups, especially
8	in the immediate before January 6th, so like January 5th, January 4th?
9	The <u>Witness.</u> Not that I remember, no.
LO	That's what I figured, but thank you.
l1	The <u>Witness.</u> Yes, sir.
12	BY ::
L3	Q Okay. You touched on this as well, a little bit about the messaging. But
L4	let's think about the messaging in particular to election day.
L5	So the results were coming in, and a couple of days later, Joe Biden was declared
L6	the winner. I guess, what was going through your mind at this point? Also, what was
L7	going through what was in the chatter of some of these Oath Keeper folks around this
L8	time period?
19	A I don't really there was like open chats where they would socialize, but I
20	didn't get into it to socialize and talk about politics or anything like that. So I pretty
21	much stayed out of it. I wouldn't just spend time hanging out in the chat rooms. I
22	remember some posts where people were unhappy with it. But, again, I just didn't pay
23	much attention to it because I wasn't in it for, you know, political reasons.
24	Q Right. So from what you did know, did you see anybody planning to do

Or what was -- from the little bit you might have read, what was the solution

24

25

anything?

1	or the next steps after President Biden was elected or declared the winner?
2	A I don't remember any plans or discussions where anybody was going to do
3	anything. You know, if that had occurred, you know, I would have known that would
4	have been illegal, so and a lot of people knew I was an ex-cop anyway. So, you know,
5	there was the military side of the Oath Keepers or former military side of the Oath
6	Keepers where they would keep more to themselves and then, you know, the ex-cops
7	would kind of keep to themselves.
8	Q So there was even kind of, not division, but there was people that you had
9	more in common within the Oath Keepers, whether it be ex-military or ex-law
10	enforcement folks?
11	A Yeah. It seemed like the ex-military people were, I don't know, trusted
12	with more, I guess.
13	Q Got it. What messaging after the election were you receiving from like the
14	national level folks, like Mr. Stewart Rhodes?
15	A There were national you know, the weekly national calls. I started
16	skipping some of them, though, at that point. So, you know, I just
17	Q Why did you start skipping them?
18	A Because, you know, there were like I told you earlier, some people would
19	talk about political stuff and, you know, I just wasn't interested in it.
20	Q I guess just overall what I'm thinking about, I hear you keep saying you're not
21	interested in political stuff, and I believe that. Why did you continue to associate with
22	the Oath Keepers in around this time period if you because it seemed like they were
23	doing a lot of political speech at this time.
24	A Again, I like doing the security part of it. You know, it was a chance to

basically take free trips, you know, so that's why.

1	Q You said the free trips part for you personally, but can you explain why so
2	many Oath Keepers would have wanted to come to D.C. for January 6th? Like, what
3	was what were people saying that might have been a different motivation than you
4	personally getting like a free trip, for example?
5	A I don't know what they're you know, again, if I had gotten any wind of
6	anybody that had any, I don't know, illegal plans or ill will or anything like that, you know,
7	I wouldn't have went in the first place. But, you know, I didn't pay much attention to
8	anybody else.
9	Q I guess I'm not really thinking about it in terms of like illegal plans, for
10	example. Were they upset? Were they mad? Was it a different type of feeling than,
11	you know, pre-election?
12	A Yeah. They were upset that Trump lost the election. You know, that was
13	discussed, but
14	Q And was it openly discussed that, not just lost, was it discussed that it might
15	have been stolen or that something was unfair, that the country was
16	A Yeah. There was discussion that it was stolen. Again, I don't know. I
17	have no idea. I still don't even know exactly what the electoral college process is and all
18	that. So I don't know.
19	Q I've seen some messages in various Oath Keeper networks about a coming
20	civil war. Did you hear anything about that before January 6th?
21	A Yeah. People would talk about that, there was going to be another civil
22	war, but I just dismissed that.
23	Q I guess, why did you dismiss it? That seems like strong words.
24	A Some of these guys, you know, it just they're just kind of old, grumpy guys

that sit around on the couch and really didn't have anything to do but complain about

things is how I dismissed a lot of them. 1 2 Q Gotcha. Was it talk or did you actually see anybody like preparing for a possible civil war or --3 I didn't see anybody preparing. Α 4 5 Q Okay. Α Again, I didn't really -- you know, I didn't go to meetings or, you know, see 6 7 anybody face-to-face or anything like that. So, you know, it was all over the chats. So your face-to-face, I guess, interactions with other Oath Keepers pretty 8 much occurred at events like Detroit and the November rally, things of that nature? 9

Α

10

Yes, sir.

1	[2:02 p.m.]
2	BY Example 1
3	Q And do you have any knowledge about the relationship between Oath
4	Keepers, like, as an organization, and then public figures like Roger Stone and Alex Jone
5	I mean, was there a formal kind of relationship between the orgs and these individuals?
6	A I don't know how the Oath Keepers came to be asked to provide security f
7	Roger Stone or Ali Alexander or I don't know how any of that worked.
8	Q I guess, just giving us, from being in the chats although I understand you
9	may not have been as active, but what would be your best guess into how, like, these
10	folks got connected with the organization? Would it have been, like, on a national lev
11	or chapter level?
12	A I don't want to guess and be wrong.
13	Q That's fine.
14	A I don't know.
15	Q That's fine.
16	A Maybe, you know, I don't know, maybe Alex Jones referred Stewart Rhode
17	you know, after him being on the podcast or something. I don't know.
18	Q And were you ever tracking any elected or congressional Members
19	coordinating with the Oath Keepers for any type of protection or security?
20	A No, I wasn't. I don't yeah, I don't know anything about that.
21	Does any staff or Ms. Lofgren have any questions?
22	And I believe it looks like Ms. Lofgren has left the deposition, so does any staff
23	have any followup questions about the messaging?
24	?
25	. Thank you.

1		BY ::
2	Q	Hi, Mr. Morelock.
3	Α	Hello.
4	Q	I was wondering about the messages after the election. You said you
5	weren't par	ticipating because you weren't really interested in those conversations. But
6	can you rec	all if and how those conversations were affected by President Trump's
7	statements	after his loss and after President Biden was declared the winner, whether his
8	tweets or h	is written or oral statements?
9	Α	I don't remember anything about that, or not that I can recall. I don't
LO	exactly und	erstand your question either.
l1	Q	So I guess my question would be whether people were reacting strongly to
12	Trump's tw	eets, Trump's press conferences where he talked about the election loss on
L3	the forums.	
L4	Α	Okay, I understand. Yeah, I don't remember any reactions to any of
L5	Trump's two	eets or anything like that. Not that I remember, not that I recall.
L6	Q	Okay, great. Thank you.
L7		BY Example 2
L8	Q	I have a followup to that. In general, though, did elected officials' rhetoric
L9	about the e	lection being stolen, did it have any influence on the Oath Keepers at all?
20	Α	I'm sure it made some of them mad. You know, they were angry with the
21	results.	
22	Q	Oh, I not even mad. Did it confirm, for example, your thoughts that the
23	election had	d been stolen?
24	А	I've never thought
)5	0	Not you in specific. Sorry. I meant like "your" as in the organization.

1	A Not that I know of.
2	Q Okay.
3	Does that prompt any followup from you,
4	. Just one.
5	BY Example:
6	Q Was there a lot of conversation on the chat about specific allegations of
7	fraud in various cities, like Atlanta, Philadelphia, Phoenix?
8	A Not that I remember. I know that Kellye SoRelle, I guess, what they
9	thought or what she might have thought is something was going on in Detroit, but I
10	really don't know specifics, as far as what she was investigating or monitoring or
11	whatever.
12	Q Did she ever speak with you at any point about what she thought of the
13	allegations? I know you don't know specifics, but generally?
14	A Well, when we were driving, you know, like, from Detroit to North Carolina I
15	guess it was, you know, if she would have to make a phone call, she would ask me to
16	stop, and then at a rest stop, gas station she would step out of the car and make the
17	calls, you know. So I don't know.
18	Q Okay. Thanks very much.
19	BY :
20	Q Did she tell you why she had to step out to make the call? Was it because
21	she was doing, like, official privileged
22	A When you're when you're, I guess you'd call it working that, I tried to be
23	professional
24	Q Yes.
25	A you know, based on the training that I've had. So you don't ask the

1 people you're protecting things like that, you know? 2 Q Understood. Understood. Almost be invisible. Is that fair to say? Α Yes. Yeah. 3 Q Okay. 4 So I have one more section I want to get through basically about communications 5 and just identifying some of these Signal chats, and then we can take a quick break before 6 we get into, like, January 5th and 6th. So just to give you a roadmap. 7 8 Are you aware of the Oath Keepers, or even the Florida chapter in specific, having 9 contact lists or directories of members? Not that I know of. I don't know how that worked. 10 Α Q Gotcha. 11 12 You mentioned this a little bit, but when you were speaking or communicating 13 with other Oath Keepers, I want to go through a list of ways that you communicated. I just want you to say, yes, we did, or, no, we did not talk through those means. 14 15 So, for example, did you all communicate via email? Α Yes. 16 Q Gotcha. But since then you have deleted those emails or they're no 17 longer --18 19 Α Correct. Correct. 20 Q Okay. Was email a pretty frequent way of communicating with each other? 21 Α No. Q Got it. And kind of along the same line, was it on ProtonMail or was it, 22 23 like --Yes, Proton. 24 Α 25 Q Got it.

1	Text message? Did you all communicate via text message?
2	A Yes, but usually through one of the apps, usually, like, Signal.
3	Q Right. So, rather than just using, like, regular text message, you were using
4	one of the encrypted messaging systems?
5	A Correct.
6	Q So Signal, I heard you say that. Were there any other encrypted messaging
7	systems that you used?
8	A I think we used WhatsApp. You mentioned Zelle [sic]; I think we used that.
9	I don't remember if there was any others or not.
10	Q Okay.
11	, can we pull up exhibit 5? And we'll go to page 19.
12	BY
13	Q So, Mr. Morelock, this is, just to this is the "Oath Keeper Florida D.C. OP
14	Jan 6" Signal chat. I just want to ask you if you know what this application is that's
15	referenced on page 19.
16	A Yes, I think I'm familiar with that.
17	Q Okay. Let's see. Page 19 says once we get there. So it says, "My
18	nephew is downloading the app." So it's said by Cobra Shelby. "My nephew is
19	downloading the app. He has plates."
20	Do you see what I'm referring to right here?
21	Mr. Rabby. Could you enlarge that?
22	Mr. Morelock. I can't read it really.
23	Thank you,
24	The Witness. I don't remember that.
25	Okay. I was just seeing if you recall what the app was that was

1 being downloaded. If not, that's fine. 2 The Witness. Yeah. Thank you, . We can take that down. 3 BY : 4 And you said that you all used Zello at times as well? 5 Q I think so. 6 Α And did you --7 Q Α I'm not 100 percent, but I think so. 8 9 Q Okay. And did you all use any other social media applications to 10 communicate with each other? Α Not that I remember. 11 Q 12 Okay. 13 So just to bring this, kind of, section to a close, if you were to just summarize for me the ways that you all communicated the most as Oath Keepers, what would that be? 14 Α 15 Probably Signal. Q So there are a number of folks that were listed in the Oath Keepers 16 indictments. And I understand -- look, I'm not trying to say that you had anything to do 17 with this. I'm just trying to understand who these folks were within the big picture, if 18 19 you knew who they were. You've already explained a few, but I want to go through 20 them individually, just to get this again from you. 21 Mr. Kelly Meggs, who was he? Just summarize it for us. Α The Florida chapter leader. 22 23 Q And what was his involvement, for example, to your knowledge, with January 6th? 24 25 He was in charge of, I don't know -- well, everybody from Florida.

- think he was coordinating with, I don't know, probably 20 other Oath Keepers. And we
- would have to get into the January 6th day, but, you know, he was supposed to have a
- group of Oath Keepers that were going to meet myself, the one other Oath Keep- -- again,
- 4 we'd have to go into January.
- 5 Q Yeah. Okay. But Mr. -- okay, that's a great summary for Mr. Kelly Meggs.
- 6 What about Mr. Kenneth Harrelson?
- 7 A I think -- I think that's Kenny from Florida. He's just an Oath Keeper from
- 8 Florida. I don't know if he was in charge of anything on the 6th or not.
- 9 He might have been -- see, they also did a security detail for Roger Stone in Miami
- prior to the Tampa one that I didn't go on. I think Kenny might've -- or Kenneth, this
- person, might've been involved in that.
- 12 Q I believe this individual, Ms. Jessica Watkins, was in the Ohio chapter, so not
- in the Florida chapter, but did you know anything about her?
- 14 A I've heard of her. I think she was one of them that got arrested. I didn't
- 15 know really who she was until after I read about the indictments or arrests or whatever it
- 16 was.
- 17 Q Okay. I did see that she was added to your Oath Keeper Florida chat. Is
- there anything unusual about maybe adding someone from Ohio to a Florida Oath
- 19 Keepers Signal chat?
- 20 A I don't know -- I think only, like, the leaders had the ability to add people to
- chats. I don't know how that worked. I didn't get into that. So I don't know anything
- 22 about that.
- 23 Q And this chat -- I mean, I'll just be candid -- doesn't look like you're chatting
- very often in this chat, so that makes sense, what you're saying.
- 25 What about Mr. Joshua James?

1 Α Yeah, I know who that is. He was, I think, from Alabama. And I think he 2 might've got assigned to the Roger Stone on January 5th and 6th, but I'm not sure. Had you seen him at any other previous events before? 3 Q I think he was at the first Million MAGA March. Yeah, he was there 4 and -- yeah. I think we gave him a ride to a hotel or something. 5 6 Q What was his general demeanor? Like, was he, let's say, more political, for example, than you? Or what was -- do you recall anything about him? 7 8 He seemed, I don't know, motivated, willing to help the Oath Keepers. And 9 this was, I think, prior to the election. But, after the election, I remember some 10 discussion about him being hotheaded or something, but I can't elaborate on it. That's all I remember. 11 12 Q What about Mr. Joseph Hackett? 13 I don't know who that is off the top of my head. I do know the one Joe, but Α he was the -- I think he was a chiropractor, actually, from the Sarasota area. That's the 14 only Joe that I remember. 15 Okay. Was that the call sign person that had "medic" in it? 16 Α I don't know. 17 Okay. We'll get to that later anyways. 18 Q 19 Mr. David Moerschel? Α Doesn't sound familiar. 20 21 Q Brian Ulrich? Not that I know of. 22 Α Thomas Caldwell? 23 Q Not that I can remember. 24 Α

Q

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And Mr. Edward Vallejo?

Not that I remember. 1 Α 2 Q Perfect. There are also various Signal chats that we've become aware of. I'm just going to 3 4 go through them, and let me know if you were a member of the group chats or whether 5 it's something that you weren't. Correct me if I'm wrong, but it seems like certain Oath Keepers were in certain 6 7 chats but you all weren't in all the chats. Is that correct? 8 Α Correct. Correct. 9 Q Okay. So, can we pull up exhibit -- actually, you don't need to pull 10 11 it up. BY 12 What about a "Leadership Intel Sharing Secure" Signal chat? Were you in 13 14 that? Maybe. I don't remember. 15 Α Q Okay. 16 Can we pull up exhibit 3, 17 BY 18 19 Q This is the "Florida Oath Keeper Hangout." Were you in this chat? 20 Α Probably. 21 Okay. Do you -- what's the difference between this "Florida Oath Keeper Hangout" versus the "D.C. OP," for example? 22 Well, the "D.C. OP" was just for the D.C. OP, so I think that was more of 23 their -- the social chat. 24

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

- into the "Hangout" chat and send stuff to you all?
- 2 A Yes, occasionally, yeah. I don't know if "normal" is the correct term or not,
- 3 but it happened.
- 4 Q Okay. It wasn't unusual --
- 5 A Correct.
- 6 Q -- is my question.
- 8 BY
- 9 Q You weren't at the December 12th D.C. rally. So were you in the
- "December 12th Security Leadership" Signal chat?
- 11 A I don't know.
- 12 Q Okay. That's fine. If you don't know, it's fine.
- Did you ever have the occasion to be in the "Oath Keepers of Georgia" Signal
- 14 chat?
- 15 A I don't think so. Not that I remember.
- 16 Q All right.
- The "D.C. OP," the "Florida D.C. OP for Jan 6," you were in that group chat,
- 18 correct?
- 19 A Probably.
- Q Okay. There was a generic "D.C. OP," so it was just "D.C. OP Jan 6, '21."
- 21 Would you have been in that one probably as well?
- 22 A Maybe. I don't remember. Yeah.
- 23 Q There was another -- and, like I said, if you don't know, it's fine -- a "January
- 24 5th-6th D.C. OP Intel Team." Does that ring a bell for you?
- 25 A I don't remember. There was always so many chats that it was just -- it was

1 just confusing. 2 I guess, why were there so many different chats? Do you know why? I don't know. I guess maybe to kind of compartmentalize different groups 3 4 and functions and things. 5 Ms. SoRelle was in a group chat called "January 5-6 D.C. Oath Keeper VIP Q Chat." Were you in that one, too, or do you recall? 6 Α I don't remember. 7 Q Okay. 8 9 And my last one is, do you recall a "D.C. Volunteer" Signal chat? I don't remember that either. 10 Α 11 Q Okav. And now I'm going to go through, I guess, individuals that I saw -- oh, sorry. 12 13 Were you also -- I meant to ask this, too. Were you a member of any of the Oath 14 Keepers Zello channels for January 6th? Α I don't remember. 15 You don't remember? Okay. Were you using Zello on January 6th? 16 Q Α I don't remember using it. I think I was using Signal. But, again, I just -- I 17 don't remember. 18 19 Q Okay. Thank you. 20 And now I'm going to go through a lot of these call signs. Just let me know if you know who these individuals are. I'm going to shoot to you who I think it is. You can 21 either confirm it or just say you don't know. 22 . Can you pull up exhibit 5, And can we go to page 1? 23 Thanks. 24 BY 25

1	Q So, if we scroll down a little bit, "Patriot Genx," is that Mr. Graydon Young?	
2	A The call sign sounds familiar, but I don't remember. It might have been a	
3	guy that lives over on the east coast of Florida, but I don't remember for sure.	
4	Q Did you know Mr. Graydon Young? Does that name ring a bell?	
5	A The name doesn't, no.	
6	Q Okay.	
7	. Can we go to page 5 of this,	
8	BY ::	
9	Q And if we scroll down a little bit on page 5, this will be a message there we	e
10	go, right here. So it looks like Patriot Genx says, "If Trump wins we need to stay active	
11	and force follow through on purging of traitors."	
12	I guess this is some of the rhetoric that we were talking about earlier and that	
13	we've been seeing in the chats. What did you take this to mean?	
14	A I don't remember reading that.	
15	Q Okay. Looking at it now it's January 3rd. It says, "If Trump wins we	
16	need to stay active and force follow through on purging of traitors." What does that	
17	mean? We're just trying to understand it, but help us help us with that.	
18	A You would have to ask him. I don't know what that means or what he	
19	meant by it.	
20	Q Okay.	
21	Can we go up to page 1, 2007?	
22	BY ::	
23	Q And just let me know if you know who "Deplorable 1" is.	
24	A No, I don't.	
25	O Still on page 1 what about "lason"? Who is lason?	

I don't know. 1 Α 2 Q Was that Jason Dolan? Α I don't know who that is. 3 Q Got it. 4 Also on page 1, "Gray Gator 1," is that Kelly Meggs? 5 Α Kelly did have "Gator" in his call sign, but I don't remember exactly which 6 7 one it was. 8 Q Okay. So I know "Gator 1," in the indictment it said it was Kelly Meggs, but the "Gray" part -- I guess I was trying to figure out if that was the same person, to your 9 10 understanding. Α I don't know. 11 Q 12 Okay. 13 Going down to page 4, who is Jeremy Brown? I think he had a "Gator" in his call sign too. But he was -- I know he was Α 14 former military, over on the east coast. 15 Was he considered, like, for example, a leader within the Florida chapter 16 17 or --Α | --18 19 Q -- just another member? 20 Α I think so. I don't -- not leader, but I think he was, like, former Special 21 Forces, so, you know, the former military people kind of looked up to him, you know, and listened to what he would talk about. 22 23 I think he used to do some kind of training calls, but I don't remember being a part of any of them, because, you know, a lot of this stuff I already knew from my law 24

25

enforcement days, so --

- 1 Q What would be, I guess, discussed during these training calls, for example?
- A I don't remember. Just maybe gear set-ups or something like that. I kind of vaguely remember something about how to set up a gear belt or something like that.
- 4 Q Got it.
- 5 "GatorBoy GatorBoy," which is on page 6 --
- 6 A I don't know who that is.
- 7 Q Okay.
- 8 And also on page 6, "Gator 6," do you know who that is?
- 9 A I think that might have been Jeremy.
- 10 Q Jeremy? Okay. Yeah, this is the picture I was kind of trying to
- understand. So there's "Gator 6," "Gator 1," "Ap242" -- was that Caleb Berry?
- 12 A I don't know.
- 13 Q All right. You're clear, that's you for "Whipit," right?
- 14 A Yeah. I did not ask to be included in that picture. I didn't know they were
- making it. So, yeah, whoever made that, I can't remember anymore, yeah, that -- that
- actually made me mad, to see that.
- 17 Q Why did it make you mad?
- 18 A Because I didn't -- you know, I'm not -- again, as I've said a few times during
- this deposition, I wasn't in it for political reasons. I mean, I certainly, no matter what
- happened, had no plans of being involved in any kind of insurrection or anything like that.
- 21 Q Gotcha. Were you mad in, like, the beginning of January when this picture
- was put in, or were you mad after January 6th when --
- A When I saw that picture. I don't remember when that was posted, but,
- yeah. And I should have actually replied, but I just didn't.
- 25 Q Got it.

- 1 What about "Cobra Shelby" on page 11?
- 2 A I remember that call sign or handle, but I don't remember who it was.
- 3 Q Was "Strake G." Tom Burgess?
- 4 A I don't know.
- 5 Q That was on page 14. Do you know Tom Burgess?
- 6 A Not by name.
- 7 Q What do you mean by "not by name"?
- A Well, I mean, you know, some of these people, if you showed me pictures of it, you know, I might recognize them. But, no, I don't know who Tom -- now, there was
- 10 a "Tampa Tom." I don't know if that's the same.
- 11 Q Okay. How do you know Tampa Tom?
- A Because Tampa Tom was -- it was myself and Tampa Tom. We -- they
- asked on the way up there at one of the gas stations -- Kelly got the group of people that
- were -- and we're going to go into January 6th again -- but the group of people that were
- heading up there, he asked for two volunteers to split from the regular group of Oath
- 16 Keepers just to help Ali Alexander's security people. So that's how I ended up with him.
- But the person -- the other person that volunteered -- I volunteered first, and then
- the other guy, his name is -- or I know him as "Tampa Tom," but I don't know his last
- 19 name.
- 20 Q Okay. Thank you.
- 21 What about "padimasterdiver" on page 19? Looks like she's the leader of the
- 22 South Carolina chapter.
- A I don't know who that is.
- 24 Q Okay.
- 25 If we go on to page 23, "Isaacs William" or William Isaacs?

1	Α	I don't know who that is.
2	Q	Okay.
3	Wha	t about "John - Flagler" on page 28?
4	Α	I don't know who that is.
5	Q	And you've already said you know Ms. Kellye SoRelle.
6	Α	Correct.
7	Q	Overall, what would be Ms. Kellye SoRelle's role with the Oath Keepers?
8	Α	I don't know if she had a role with the Oath Keepers. You know, I just at
9	first, I just kı	new that we were supposed to protect her.
10	Q	Okay. But you were just protecting her as a celebrity or as, like, another
11	Oath Keepe	r, I guess is what I'm trying to understand.
12	А	They asked for volunteers to go protect her, and, you know, I didn't really
13	ask why or a	anything like that.
14	Q	I guess I just that's something I'm trying to understand. Just help me
15	understand	your mindset. Why wouldn't you ask why about who you're providing
16	Α	Well, I mean, I'm sorry. Let me correct myself. I mean, it was, they said,
17	we need a	and I think it was Stewart Rhodes in one of the chats we need
18	volunteers -	- you know, I don't remember if he specified bodyguard experience or
19	not to go	to Detroit to protect her because she's being harassed by different groups.
20	Q	So, if it came down from Mr. Rhodes or from Kelly Meggs, for example, you
21	didn't really	question who you were going to protect or provide services for?
22	Α	No. Most of these people, I hadn't I hadn't heard of any of them, so, you
23	know, I wou	ld have to google them to see who they were.
24	Q	Okay.
25		Does anyone have any followup questions after that, before we

1	get int	, you know, January 5th and 6th specifically?
2		All right. Well, it's I have it as 2:26 p.m. eastern time. I know it's 1:26 your
3	time.	Let's come back at
4		Mr. Morelock. Can we just keep going? I'd like to finish this up.
5		. We need to take a quick break, and then we'll come back on the
6	record	at 2:35. Thank you.
7		[Recess.]
8		. We'll go back on the record at 2:36 p.m. eastern time.
9		BY :
10		Q Mr. Morelock, I have a few followups from earlier.
11		guess, walk us through your process of how you would prepare to provide
12	persor	al security for folks. So what process did you go through, if any at all?
13		A When I had my business or when I was with the Oath Keepers?
14		Q Let's do both, and compare for us so we can understand.
15		A When I had my business, you know, I would ask, you know, whoever called,
16	poten [.]	al clients, why do you need protection? Usually it's just because they were
17	celebr	ies.
18		And then, you know, if there was going to be some kind of speaking engagement,
19	you kr	ow, I would go look at the venue, figure out where the exits were, figure out where
20	the ho	pitals are, routes to and from hotels, just things like that.
21		Q But for the Oath Keepers, you didn't do the same type of process?
22		A Not as detailed. I tried to be professional, but not as detailed.
23		Q But I'm not even talking about, like, super-detailed. Did you not even, like,
24	google	I mean, like, you said you didn't know who these individuals were. Did you
25	google	them at some point before you would go provide protection for them?

а

1	A Yes. Yes.
2	Q Okay. And then, I guess, did you notice the nature of these folks were
3	mostly political? Because I've heard you say you didn't want to do anything political.
4	But did you notice these were mostly political figures?
5	A Yes, I did, when I like, when I googled Roger Stone and, you know but
6	you try to separate just because somebody believes something, one way or the other,
7	doesn't necessarily mean they don't deserve to be protected from physical harm.
8	Q Okay.
9	Mr. Rabby. I believe, was your role different? I mean, as a private person
10	owning and operating a business, that's one thing. But were you in charge of all this
11	protection with the Oath Keepers, or are you just filling a role they asked you to fill?
12	Mr. Morelock. No, I wasn't in charge. They would they knew I had that as a
13	background, so sometimes they would ask, you know, what do you think we should do?
14	And, you know, I would offer input that way, but just as far as, I guess, techniques, you
15	might say, and route planning, that sort of thing.
16	And they didn't listen to me a lot. Like, you know, there was somebody in upper
17	management who wanted us in helmets and vests, and I'm like, that's not how you work a
18	personal security detail. Yeah, if you're in Iraq or Afghanistan, yeah, you're going to be
19	dressed like that, but if you're in Washington, D.C., or, you know, Clearwater, Florida, you
20	don't need all that stuff.
21	BY I Section 1.
22	Q Okay. And help us, I guess I guess, was part of googling these individuals
23	trying to understand maybe the nature of the threats that could be present while you
24	were performing security for them?

25

Α

Yes.

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

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

Q Okay.

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

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

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

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

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

1	There's a lot of talk of, like, ammunition and gear and stuff like that in this Florida Oath	
2	Keepers chat. How come you didn't speak up at all in that chat to say what you're	
3	saying here?	
4	A I remember talking I think it was in maybe just a personal chat with Kelly	
5	Meggs, saying, we don't need all that stuff, you know. And even in D.C., you know, if	
6	you go through the records, I don't remember on January 5th or 6th, but I told several	
7	people that we do not need to dress up like we're in the military.	
8	Q And what was Mr. Meggs's response to those to your conversation?	
9	A I believe he said something along the fact the lines of: National wanted	
10	it. National leadership wanted us to be recognizable.	
11	Q And so I'm probably going to keep coming back to this question throughout.	
12	Why did you continue to work this if you disagreed with what they were saying and their	
13	methods?	
14	A Because I knew what I'm capable of. I had my plan. You know, if	
15	something happened, I was gonna grab the person and say, look, this is what we need to	
16	do to get you out of here. If they wanted to stay in the crowd or whatever, I would've	
17	just left them. You know, I wasn't going to put myself in any undue danger, you know,	
18	over making the Oath Keepers mad at me.	
19	I knew what had to be done, based on the training I had. One of the training	
20	classes I went to was taught by a former Secret Service agent, and that person said:	
21	Forget about all the guns and the bulletproof vests and the karate and all that stuff. Get	
22	your person out of there. Keep a low profile. Be professional. And that's how I try to	
23	conduct myself.	
24	. Does any of the staff have any followup from that line of	

questioning?

1	BY:
2	Q Just to confirm, that Secret Service training, was that something you took on
3	your own, or was that through the Oath Keepers?
4	A That's something I took on my own, way before the Oath Keepers.
5	Q Before? Okay.
6	. So can we pull up exhibit 17,
7	BY ::
8	Q And while he's pulling it up, on December 14th, 2020, Mr. Stewart Rhodes
9	published a letter on the Oath Keepers website advocating for the use of force to stop the
LO	lawful transfer of Presidential power.
l1	Do you remember this letter and we can scroll through just so we can see. Do
L 2	you remember this letter from Mr. Stewart Rhodes?
L3	A I started reading it, but I don't even remember reading the whole thing,
L4	because it was quite lengthy and
L5	Q What did you think, from the little bit you did read? And just to give you, it
L6	goes into the Insurrection Act and stuff. So what did you think as you were reading this
L7	letter?
L8	A I thought that would never happen, you know, that President Trump
L9	wouldn't do that. So I just kind of dismissed it.
20	Q And, I mean, this letter is talking about, like, overthrowing the government
21	to a certain extent, right? How did you how were you able to dismiss that?
22	A I don't remember what it said. Like I said, I don't think I read the whole
23	thing.
24	Q Okay.
5	What was the response of Oath Keepers that you may have been in contact with

1	or in discussions with at this time about this letter? Was this something that was felt by	
2	the majority or just Stewart Rhodes only?	
3	A I don't remember any discussion about it. I'm not saying it didn't happen,	
4	but I just don't remember it.	
5	Q You're former law enforcement. Like, I guess I'm trying to understand how	
6	this type of rhetoric made you feel as someone that I assume still supported law	
7	enforcement leading up to January 6th, right?	
8	A Again, I didn't think it would happen. As I said before, some of these guys	
9	would just basically sit around and grumble about stuff. So I kind of just dismissed it as	
10	that.	
11	You know, if I would've thought it was serious, I would've probably called the FBI	
12	and then volunteered to be a confidential informant. But I just perhaps I should've	
13	paid more attention, based on what happened, but I just dismissed it. I didn't think	
14	anybody would do anything quite as stupid as what happened.	
15	Q And not even talking about what happened on January 6th, just really	
16	focusing on this letter, is it fair to say that individuals were making these types of claims	
17	so frequently that it allowed you to kind of, like, dismiss this as just another grumbling	
18	from the group?	
19	A Yeah. And it wasn't just Oath Keepers talking about that stuff. I mean,	
20	people on social media and interviews on TV and you know, it's just a lot of people	
21	weren't happy. But, you know, again, I didn't think anything would come of that.	
22	Q So you were tracking that other groups, other than just the Oath Keepers,	
23	were talking about these possible options?	
24	A Just posts on different social media. I mean, it's you know, since then,	

I've blocked those kind of posts and put, you know, "not interested" or "spam" or

- 1 whatever because I just don't want anything to do with it. 2 So, again, it wasn't my, you know, intention for joining the Oath Keepers. You know, my intentions were honorable, I guess. So it just -- it didn't interest me at all. 3 4 thought it was just basically nonsense. So perhaps I should've paid more attention and 5 quit sooner than I did. Where were you seeing these posts? You said "social media." What 6 Q social media app were you seeing these posts on? 7 Α I don't remember. Probably all of them. 8 9 Q Okay. So by "all of them," do you mean Facebook? 10 Α Facebook, Twitter, Instagram. Parler? 11 Q I don't remember Parler. I might have been on Parler, but -- maybe I was. 12 13 But, yeah, I just -- I mean, you would hear people talking in the grocery store about stuff like that. You know, it just --14 15 Q What about Telegram? Did you see anything on Telegram? Α No. I've only recently joined Telegram. 16 Q Okay. And any other social media apps that I didn't mention that you were 17 seeing this type of rhetoric on? 18 19 Α Possibly. Again, I didn't pay a lot of attention to that kind of stuff. 20 Q Okay. So you said -- just, like, fill it in for me. What social media app did I 21 not mention that you might've seen this on that you were active on? I don't know. Twitter, maybe? 22 Α Thank you, Can we pull up exhibit 8, please?
- Q And I'm pulling this one up just to orient you again. So this December 19th. 25

BY

23

Did you follow the President on Twitter? 1 2 Α No. You didn't follow -- okay. Well, he tweeted on January -- or on December 3 O 19th, "Big protest in D.C. on January 6th. Be there, will be wild!" 4 So this is the first time the President mentions January 6th. Do you remember 5 6 approximately when you were tracking January 6th as an event? 7 Α Yeah, I guess when they asked -- they did their call to action -- when the Oath Keepers did a call to action. 8 9 Q I'm just -- this is -- I'm just curious. Why didn't you follow the President on 10 Twitter? 11 Α Why didn't I? Q Uh-huh. 12 Α I had -- I had no reason to. 13 So who were you following on Twitter, then? 14 Q 15 Α I don't even know if I had an active Twitter back then. You know, I've recently started following on a couple cryptocurrency people on Twitter. 16 remember talk about, you know, posts about that kind of stuff. I just -- again, I don't 17 pay much attention to politics and things like that. 18 19 Q Mr. Morelock, you literally just said to me 5 minutes ago that you were 20 seeing Insurrection Act stuff on social media like Twitter. That's why I'm asking the 21 question about --Yeah, I said "perhaps Twitter." I mean, I just -- you know, that stuff was all 22 23 over the place. It was being covered by normal CNN and -- what's the other one -- FOX and, you know, channels like that. I don't know exactly where I saw this stuff. But, you 24

know, when I saw it, I didn't pay a whole lot of attention to it.

1	Q Gotcha. Okay.
2	So can we put up exhibit 18 now,
3	BY ::
4	Q So this is on December 23rd. It's another letter from Mr. Rhodes. In this
5	one, he says, "Tens of thousands" this is in quotes. "Tens of thousands of patriotic
6	Americans, both veterans and non-veterans, will already be in Washington D.C., and
7	many of us will have our mission-critical gear stowed nearby just outside D.C."
8	Do you recall this letter?
9	A I think I think is that his second open letter?
10	Q It is.
11	A Yeah. Again, I might've read some of it, but I just didn't pay a lot of
12	attention to that, because, you know, I I didn't agree with it. I didn't think it was going
13	to happen. I
14	Q What part of it didn't you agree with?
15	A That the President should invoke, or whatever you call it, the Insurrection
16	Act.
17	Q So this one, this letter, what stands out to me, right, is that Mr. Rhodes is
18	talking about, many of us "patriotic Americans, veterans and non-veteranswill have our
19	mission-critical gear stowed nearby just outside D.C."
20	What does "mission-critical gear" mean?
21	A I don't know for sure, but I'm assuming that would be, like, you know, the
22	helmets, the vests, and probably weapons too.
23	Q And doesn't that seem to kind of go in line with the Insurrection Act talk?
24	A You could look at it that way. The way I thought the people that were
25	going to you know, part of the discussion I remember was, you know, the people that

1	had the guns and stuff that were waiting in Virginia would be in case, you know, we	
2	needed rescue, you know, if there was some kind of antifa attack or something like that.	
3	But, yes, to answer your question, yeah, you could look at it that way.	
4	Q I guess, what allowed you to not look at it that way?	
5	A Just my, I don't know, intuition that I didn't think the President was going to	
6	call for an insurrection.	
7	Q You also mentioned earlier I just want to touch on this one of the main	
8	threats you mentioned was antifa. What did you take antifa to be? Like, what was	
9	antifa or what is antifa?	
10	A I to this day, I don't know what antifa is. I know it's a group of people	
11	that, you know, go to protests and sometimes hijack, you know, legitimate protests and	
12	turn them into riots, is kind of what I was thinking.	
13	Q I guess, how do you defend against a threat you don't really know what it is?	
14	A When it attacks you.	
15	Q So, if anyone would've have attacked you let's say you're providing	
16	personal security protection for folks. If anyone attacked you, would you have just	
17	assumed it was antifa? Is that kind of what was going around? Or	
18	A I would've my concern was not, who is this; more, how do I get this person	
19	I'm protecting, you know, out of here and out of harm's way.	
20	Q When you're protecting folks, do you look for certain types of, like, personal	
21	identification or clothing or symbols that can maybe alert you to who they are? Is that	
22	something that's normal to do when you're providing protection?	
23	A You just mainly watch the crowd, you know, try to watch people's hands.	
24	You know, if you're in a crowd of people and you know, what they told us in	
25	training and, you know, 100 people are smiling and 1 guy looks mad, watch the guy that	

1 looks mad. That kind of thing. 2 Q Okay. 3 Let's pull up exhibit -- actually, never mind. On December 25th -- and this is in your "Oath Keeper Florida Hangout" -- do you 4 recall a message from Kelly Meggs saying, "We need to make those senators very 5 uncomfortable with all of us being a few hundred feet away"? Do you recall Mr. Meggs 6 7 saying -- or any rhetoric like that about making Senators feel uncomfortable? Α Yes, vaguely. 8 9 Q What did you take these messages to mean? 10 Α I don't remember for sure. It's -- I think it was -- I don't know if it was in 11 that chat or if it was in a personal chat, you know, with Kelly. Again, I'm like, you need 12 to focus on providing security. You know, other than that, I don't know. Q But if the leader of the Florida chapter is talking about making Senators feel 13 uncomfortable, doesn't that show you that it's not necessarily about security, and may be 14 15 about a political statement of U.S. Senators? Α That's -- yeah, that's one way to look at it. 16 Q What's the other way? 17 18 Α I don't know exactly. I mean, what I -- what I meant by saying that is, I can 19 understand you seeing it that way or understanding it to be that way. 20 Q How would you have -- I guess, take me through what you were thinking at 21 this time, though, when you heard, "We're going to make Senators uncomfortable." 22 Α Again, I vaguely remember talking to Kelly about it. I don't know if it was 23 over a phone call or a chat or what. But, you know, I reiterated that, you know, we

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

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should be going up there for security.

- Alexander, that's why I volunteered, to kind of separate myself from that group, you
- 2 know. Because this guy Kenny was a hothead -- and I told the FBI this. Kenny was a
- 3 hothead. I think Jeremy was a hothead, you know. So I wanted to separate myself
- 4 from that group.
- 5 Q That makes complete sense.
- 6 So help me understand, then, why you wanted to separate yourself. So I just
- 7 read to you, "We're going to make the Senators uncomfortable." It seems totally logical
- 8 that you would want to separate yourself from that. What did you take it to mean or
- 9 what did they tell you it meant, they were going to make Senators feel uncomfortable?
- 10 Like, how were they going to accomplish this?
- 11 A They didn't say. I don't remember them saying that. So I don't know how
- they were going to accomplish that.
- 13 Q Okay.
- 14 What did you understand January 6th to be? Like, why were you going to D.C.?
- 15 A I went to D.C. to provide security for Ali Alexander.
- 16 Q And the main threat you were tracking for Ali Alexander was antifa or other,
- kind of, groups that might be adverse to him?
- 18 A Correct.
- 19 Q Did he provide you this list? Did anyone provide you this list? Or was it
- 20 just kind of, like --
- A No. It's just something I assumed.
- 22 Q What was the nature of the message regarding why you were going to
- 23 January 6th? Do you know that?
- 24 A Uh --
- 25 Q I guess, what was being told to you about why you all were going to D.C. on

1	January 6th?
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To do security.

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

> Α I don't know.

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

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

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

Q Okay.

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

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

1 Q And, I guess, if it's not events or anything, what would you be providing 2 security for? Just, like, Mr. Alexander going shopping? Like, what were you providing security for? 3 4 Α They just wanted a -- from what Kelly Meggs told us, is Ali Alexander and his security detail wanted a couple extra -- I don't know if his security detail wanted us there, 5 6 to tell you the truth. I think maybe they thought we were imposing or stepping on their 7 toes or something or, you know, maybe making them think that they were less effective 8 than they were. But, you know, so -- and I told those guys, I'm like, "Just tell us what to 9 do. We're here to support you." So --10 Q So Mr. Alexander's security detail, do you know -- and I understand he had 11 almost, like, separate folk that he brought in to have his security detail, almost, like, 12 layers was the way it was described to us. 13 Do you know who these individuals were, other than you and, it looks like, Tampa Tom? 14 Α 15 There were two -- I don't know what company they worked for, but they said they worked for, like, a bodyguard company out of D.C. 16 Can you describe these individuals for us? 17 Q 18 Α Younger guys, in shape, muscular. 19 Q Were they Black guys? White guys? Hispanic --Α No. White guys, I think. Maybe Hispanic, but --20 21 Q Okay. 22 Α I kinda remember them being a little dark-skinned, but I'm not sure. 23 Q Got it. 24 So you received this request from, it sounds like, Kelly Meggs regarding Ali

Alexander. He's the one that kind of alerted you to it?

1	А	Yes.
2	Q	Okay. And you thought it was just going to be purely personal security
3	detail for M	Ir. Ali Alexander. Is that correct?
4	А	Correct.
5	Q	And did Mr. Meggs assign you or give you this opportunity because you were
6	expressing	some type of, like, skepticism about the Senator talk? Is that what kind of
7	prompted t	his?
8	Α	No. The way we were at maybe a gas station or a truck stop, and he's
9	like, "I just į	got a call from," I think he said, "national. They want two Oath Keepers
10	that'll be w	ith Ali Alexander and his security in a really nice hotel." I said, "I volunteer."
11	So,	you know, it was going to be because the Oath Keepers, I forgot where they
12	were going	to say, but he said it was a really nice, upscale hotel, so I quickly volunteered.
13	Q	And the hotel he was talking about was the J.W. Marriott Downtown? Is
14	that the ho	tel?
15	Α	Yes, I believe so.
16	Q	Got it. Okay. And do you recall when you gave your name for this to Kelly
17	Meggs?	
18	Α	Again, it was at a rest stop, you know, when we stopped for gas.
19	Q	Would this have been on January 4th? January 5th? January
20	Α	Forth, probably.
21	Q	Okay.
22	Α	I think we left on the 4th to drive up there.
23	Q	Got it.
24	And	what were you tracking as to what the other Oath Keepers that were on the

trip with you were going to be doing? What did they tell you they were going to be

1	doing?
2	A I don't remember talking to them about it. Again, we'd have to get into
3	the events of January 5th. We were supposed to have a meeting with Kelly Meggs and
4	maybe one or two of his group. This was after I already separated and went with
5	Alexander and his security people. There was supposed to be a meeting on the 5th
6	at I think it was at 11:00 p.m., if I remember correctly, between Kelly and a couple of
7	the people that were coordinating whatever Kelly was doing, because Alexander do you
8	want me to get into this now?
9	Q Yeah, please.
10	A Okay. So, from what I understood, what we were going to be doing on the
11	6th was, there was Ali Alexander he had five or six staff people, I guess, with him
12	usually at all times, two security people. But supposedly he was supposed to meet up
13	with VIPs, is what they were called I think he said some were going to be
14	Congresspeople and escort them from after the President talked I can't pronounce
15	that word. It starts with an E.
16	Q The Ellipse?
17	A Yeah. Wherever that stage was, to a stage where Ali Alexander was going
18	to be talking at the Capitol.
19	But that meeting never happened. Alexander canceled it. So we were pretty
20	much in the dark on January 6th. And when you want me to get into that, I will.
21	Q Okay. So you learned of the possible congressional Members on, you said,
22	the night of the 5th?
23	A Correct.
24	can we pull up exhibit 5 and go to page 15?
25	BY Example :

1	Q	The reason why I'm pulling so this is in your "Florida D.C. OP." It looks
2	like Gray Ga	tor 1, who I'm just going to assume is Kelly Meggs, mentions the possibility of
3	personal sec	curity detail for eight Congressmen on January 3rd.
4	But y	ou didn't know about it until you got to D.C.? Just help like, were you not
5	tracking	
6	А	Maybe. Maybe. That now that's kind of refreshing my memory.
7	Maybe it wa	s for Congress.
8	Q	Okay. So you knew about the possible PSD for Congressmen
9		. You can zoom out little bit, , so we can see that whole
LO	message.	
l1	The <u>\</u>	<u>Witness.</u> Yeah, I can see it now.
12		BY ::
L3	Q	Okay. You knew about this before you made the trip up to D.C., correct?
L4	А	Yes. Yes.
L5	Q	So was your plan, then, to do PSD for Congressmen and Ali Alexander, or
L6	were there g	going to be separate people doing it for the Congressmen?
L7	А	The Ali Alexander part didn't actually, I think it was going to be separate.
L8	I think some	people were going to be with Ali Alexander, and then Kelly and whoever he
19	put in charge	e of, you know, what you're showing me now was separate.
20	Q	Were the people that you considered hotheaded, were they going to be with
21	the Congres	smen? Like, where were they going to be?
22	Α	Yeah, I think they were going to be with the Congressmen.
23	Q	Okay.
24	l gue	ss I'm still trying to understand why you thought this was an apolitical or
25	nonpolitical	thing if you know that you're doing this for Congressmen at a Presidential

1 rally. 2 Α Again, it's just protecting people. You know, it's -- you know, some people go to concerts. I had an NFL player that liked to go to strip clubs. And, you know, 3 it's -- you don't really question who you're protecting or, you know, what they want to do 4 5 or where they're gonna be or what they're gonna talk about. Your job is to protect them. 6 Q And you weren't tracking any possible, like, I don't want to say, like, violence, 7 but, like, chaos in your chat? 8 9 And the reason -- I want to -- and I'm going to point you to a specific part of this 10 chat. . Could we go to page 21, 11 On page 21 -- and believe me -- actually, I don't want to put any words in your 12 13 mouth. The first -- it looks like on January 3rd, they send out -- Hatsy sends out an itinerary of what January 5th and 6th are going to be like. He says, "Just got this" -- I'll 14 wait for you to scroll down, 15 Perfect. Can you zoom out little bit? 16 Thank you. 17 So, if you scroll down, Hatsy sends an itinerary on January 3rd. He says, "Just got 18 19 this from 'stop the steal' people." 20 And then keep scrolling down, the next page. And then someone says back, "8x flex cuffs." 21 BY : 22 23 Q That doesn't seem like just a standard personal security detail, does it? Or you correct me if I'm wrong. 24 25 No, I wouldn't bring flex cuffs on any detail.

1	Q	So I guess I'm trying to understand what your mentality was about what you
2	think Janua	ry 6th was going to be when you're seeing rhetoric like this in the Signal chat?
3	Α	I just thought it was people running their mouths.
4	Q	Okay.
5	Do y	ou recall, did Kelly Meggs ever tell you which congressional Members you all
6	were suppo	sed to be escorting from the Ellipse to the Capitol?
7	Α	I don't recall.
8	Q	Was a march, I guess, per se, from the Ellipse to the Capitol always part of
9	the plans fo	r the security you were going to be providing?
LO	Α	Yes. As far as I knew, it was.
l1	Q	Okay.
L2		. Can you take that down,? We're good. Thank you.
L3		BY ::
L4	Q	And were there specific parts of the day for January 6th, whether it be at the
L5	Ellipse, at th	ne Capitol, or the march, that you all considered more high-risk?
L6	А	No
L7	Q	Okay.
18	А	not that I remember.
19	Q	How many people overall were needed for the security on January 5th and
20	6th that you	ı recall?
21	А	For just that well, there was myself and Tampa Tom for Alexander
22	personally.	And then, you know, I think there was, like, 20 or 30 other ones that were
23	responsible	for the I guess the Congressmen or the VIP or whatever you want to call it.
24	Q	Do you remember which VIPs that those other folks provided protection for?

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

1 the guy Josh from Alabama was in charge of that. I'm not sure. 2 Q Got it. Were you coordinating with Oath Keepers from other States on the security for 3 4 January 6th? No, not that I remember. 5 Α 6 Q Just that Josh guy from Alabama? He's the only one? I didn't coordinate it with him. I just remember somewhere him and his 7 Α group or whatever getting assigned to Roger Stone. 8 9 Q And I think you might've mentioned this earlier. Were you paid for this job, 10 for coming to D.C. on this? Α 11 No. Q Was that part of a deal for you all agreeing to come, was that you'd be 12 13 reimbursed or paid? Α Usually, on any Oath Keeper call to action, you would get reimbursed hotel, 14 15 food, gas, rental car if you needed it. And would it be reimbursed by the individual you're providing security for or 16 by the organization? 17 Α No. Usually it was Oath Keepers. 18 19 Q Other than, like, Ali's, it sounds like, separate security, was it only, kind of, 20 the Oath Keepers that were providing the security where you were involved or where 21 others were involved? Or was it, like, a combination of you all and other organizations? What are you -- I'm sorry, I don't follow you. 22 Α 23 Q Was it a combination of Oath Keepers and Proud Boys, for example, providing security, or was it just Oath Keepers? 24 25 Α The only time there was another group was -- remember I said the first

1	Million MAGA March? There was Proud Boys also around Alex Jones.	
2	Q I guess I'm for January 5th and 6th, though, was it the same? Were there	
3	Proud Boys helping with security at all?	
4	A Not that I saw or were aware of.	
5	Q So, of what you saw and what you were aware of, it was just Oath Keepers	
6	and then those two guys that Ali had on the side as well?	
7	A Correct.	
8	Can we pull up exhibit 9, 1997?	
9	BY Example 2:	
10	Q These are going to be text messages between you and Ali Alexander. And	
11	this is just to get you in the mind of the dates on here.	
12	Okay. So I believe, just to confirm, your number is the number?	
13	A Yes.	
14	Q So it looks like you text Mr. Ali Alexander on January 5th at 11:00 a.m.	
15	Just walk us through your travel of how you got to D.C. from the panhandle.	
16	A I met up with Kelly Meggs at the car dealership he worked at in Lake City,	
17	Florida. I left my car there and rode with him in his truck.	
18	We met up with two or three other vehicles around Jacksonville, drove up to an	
19	Oath Keepers' house in or property, I should say, in North Carolina. I know him as	
20	"Ranger Doug." I think it might be Doug Smith.	
21	We just stayed there for 4 or 5 hours, kind of slept in, I don't know, basically a	
22	shed on cots, and then drove to D.C. on the 5th.	
23	Q So what day did you leave? January 4th, you said?	
24	A Yes.	

t up with Kelly Meggs. Who all who else rode
is wife, a young 20-year-old Oath Keeper named
d earlier?
I just know him as Caleb. And then the guy
else was with you, if anyone at all, when you all
ool from Florida. There was three or four other
riving an RV. I think he stayed on the property,
people 10, 12 people that slept in
y.
of your recollection, as many of those 10 or 12
ode with you all in the caravan?
k Kenny was in the caravan, but I don't know for
rife, Joe, and Caleb and myself in Kelly's truck, but
ne top of my head.
g as you were making this trip from Florida up to
talked about a lot of stuff. Listened to music a
e were probably talking a little bit, you know, as
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far as tactics and, you know, routes and things like that, but nothing that I can remember

1 stands out. 2 Q Tactics and routes for what? Getting people to and from their hotel. You know, I probably, 3 Α again -- maybe this is when I talked to -- you know, I said it's important if there's a threat 4 5 to get the person out instead of staying and trying to fight the threat or whatever, maybe 6 things like that, but I don't remember for sure. 7 I guess -- this is taking like a few steps back. What were you all expecting Q would happen in D.C. on January 5th or 6th? 8 9 I don't know what anyone else was expecting. I can't speak for them. 10 Myself, I was expecting to go up there, provide security, what I thought would mainly be 11 during the day, maybe a little bit into the evening, and then, you know, go off by myself 12 and take some photographs of the monuments. 13 You're talking about tactics and routes, though. What were you expecting Q not just like -- were you expecting there to be violence or any type of situations that 14 would cause for that? 15 Yeah. When you do that kind of stuff, you always plan for something, I 16 mean, or, you know, expect it, try to have a response to it. But, you know, again, there 17 was the Antifa threat, you know, so I thought. 18 19 Q 20 November, you had done rallies in Florida. Did you ever have any actual situations 21 occur during these events before? I didn't do any rallies in Florida. 22 Α 23 Q Other than Mr. Stone speaking --Yeah, his speeches. Yeah, we didn't have any problems. 24 Α

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

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1 Million MAGA March November as well, right? 2 Α No, no problems. I guess, if there had been no problems previously, why were you expecting 3 Q there to possibly be a problem this time with Antifa? 4 Α It's just always a possibility. 5 6 Q Okay. So how long did you all stay in North Carolina? Α Maybe 4 or 5 hours. 7 Q Overnight? 8 9 Α We got in there at probably like -- I don't know, I don't know the time for 10 sure -- 9, 10, 11 o'clock, and we left by 4 or 5 in the morning. 11 Q And you were with these individuals the whole time until you got to D.C.? Α 12 Correct. Q Did they stay in D.C. as well? 13 Α Yeah. The majority, Kelly and his, you know, what turned into his group, 14 15 yeah, they stayed at -- I don't remember where they stayed, but they stayed in D.C. While you all were traveling up, did you talk at all about, you know, 16 President Trump's tweets or election being stolen or Insurrection Act? Did that come up 17 during conversation? 18 19 Α Not that I remember. 20 Q , can we pull up exhibit 5, again, and let's see -- let's go to -- let me 21 check the site real quick. Let's go to page 2, and scroll down to the bottom of it. So at the bottom of this, 22 23 Gray Gator 1, who I think -- you can't confirm, though -- is Kelly Meggs, says, "Wednesday," as in the 6th, is "full on battle rattle." 24

What does that mean?

1	Α	The battle rattle is what they refer to as their helmets and their bulletproof
2	vests.	
3	Q	And this is the part you disagreed with that you were saying?
4	А	Yes. Yes.
5	Q	Okay. Thank you, You can take it down.
6	And	so you arrived on January 5th, correct?
7	Α	Yes.
8	Q	And you then you were dropped off, I'm assuming, at the JW Marriott?
9	А	Yes. First, we dropped off, you know, everybody that had weapons,
10	dropped th	em off in Virginia at the Comfort Inn, as I told the FBI. And then another
11	Oath Keepe	er, I don't remember what his name was, took myself and Tampa Tom to
12	the we co	ouldn't pull up to the JW Marriott because D.C. Police had that area kind of
13	blocked off	for vehicle traffic, so we had to walk like four block four or five blocks in
14	that perime	eter to JW Marriott.
15	Q	So let's backtrack. You said you dropped off folks with weapons at the
16	Comfort In	n in Virginia. Who got dropped off at the Comfort Inn in Virginia?
17	Α	Everybody else stayed there, you know, and I left separately, myself, Tampa
18	Tom, and tl	nis guy that was driving a van, left that whole group.
19	Q	So did Kelly Meggs and Ms. Connie Meggs stay in D.C. or at the Comfort Inn
20	in Virginia?	
21	А	I believe they stayed in D.C.
22	Q	Okay. And what type of weapons did people bring if they're being dropped
23	off at the C	omfort Inn?
24	А	Rifles and pistols.
25	Q	Why were you all bringing rifles and pistols?

- 1 A I don't know. I mean, I had two pistols.
- 2 Q Why did you bring two pistols?
- A It's just personal choice. I mean, I brought -- I brought my weapons. I
- 4 have a concealed weapons permit. It was good in all the States except for Washington,
- 5 D.C., so, you know, I made sure I was legal the whole way up there and back, but I did
- leave them in at the Comfort Inn in Virginia. But, you know, sometimes I carry a gun
- 7 because it's my right and I'm a former police officer. If I see something happening on
- the side of the road, you know, an officer getting attacked or, you know, a robbery or
- 9 something, you know, I may or may not get involved.
- 10 Q So you all were tracking D.C.'s gun laws then previous before January 6th?
- 11 A Yes. Yes.
- 12 Q Okay. And -- and I guess the rifle -- look, I get it with the pistol stuff.
- 13 Why -- why -- what was the thought in bringing rifles from Florida to Virginia for personal
- security details on January 5th and 6th?
- 15 A I can't speak for the people that brought them.
- 16 Q I'm not asking you to speak for them; I'm asking what you might've heard on
- the ride up.
- 18 A I don't remember any conversation about that.
- 19 Q Okay.
- 20 A You know, I think at one point I told Kelly or something that, you know, we
- 21 didn't need to bring a lot of weapons. I just -- again, I don't remember specifics of that
- conversation but, you know, I did make my point known that I didn't think we needed to
- 23 bring rifles. So -- you know.
- 24 Q Right.
- 25 A They're grown men. They have their permits. I can't tell them what to

- do. I wasn't a leader. I wasn't in charge.
- 2 Q So on your ride up, you heard nothing of a QRF, or quick reaction force, for
- 3 the hotels in Virginia like the Comfort Inn?
- 4 A I don't know if we discussed that on the way up. There was some
- discussion about it in one of the planning chats or something that there would be a QRF,
- but, again, they tended to assign military or ex-military guys to those groups, you know,
- 7 instead of, you know, police or former cops or, you know, people with no military
- 8 experience. So --
- 9 Q I guess I'm trying to understand, though, what you thought this was going to
- be -- like a QRF, does that seem synonymous with personal security detail, by the way?
- 11 A It's overkill.
- 12 Q So why did you -- what was your understanding on why folks in your group
- were planning for a QRF?
- A I don't -- a lot of these people I just dismissed as people that are sitting on
- the couch, they like to dress up in what we call the cool guy stuff, you know, the helmets
- and the things -- I don't agree with it. That's not my lifestyle, but it wasn't my place to
- say anything to the contrary to the people. So I just kept my mouth shut.
- 18 Q That I understand. I definitely do. Do you -- do you know if there was
- anyone in charge of or kind of coordinating the QRF?
- 20 A Probably, but I don't remember who -- who it was.
- Q Was it Mr. Ed Vallejo? Does that ring a bell?
- A I do not remember.
- 23 Q What about Mr. Caldwell, Thomas Caldwell?
- 24 A I don't remember.
- Q Do you know where the QRF was? Was it in the Comfort Inn in Ballston,

1	Virginia?	
2	A They were staged somewhere in Virginia, but I don't know where they were	
3	staged. I think they might have had their own chat group. I don't remember.	
4	Q Do you recall dropping off anybody in the Hilton Garden Inn in Vienna?	
5	A No, I don't think so.	
6	Q Can you pull back up exhibit 5 and go to pages 9 and 10,	
7	So in this chat that we're going to go down to on page 9 and 10, Gray Gator	
8	updates you all on the ammo situation if SHTF, which I'm assuming means shit hits the	
9	fan. What could possibly hit the fan that you all were preparing for that you would have	
10	to be updated on the ammo situation?	
11	A I don't remember for sure. That might have been like an armed Antifa	
12	attack or something like that. Again, I just that kind of stuff I just dismissed. I knew	
13	the shit was not going to hit the fan. I guess I was wrong because the Capitol got	
14	attacked, but, you know, I didn't expect problems.	
15	Q But you took this all to mean to counter the threat to Antifa. That's what	
16	all this talking was about?	
17	A That's how I understood it.	
18	Q Thank you,	
19	So, again you stayed at JW Marriott. You might have said this, but who	
20	stayed was any other Oath Keeper stay with you in the JW Marriott?	
21	A Tampa Tom.	
22	Q Tampa Tom. Did you all stay in the same room or different rooms?	
23	A Same room.	
24	Q Was your room paid for when you got there or did you guys pay for it?	
25	A The room was paid for. I had to give them my credit card for incidentals,	

1 but we didn't do anything from the mini bar or anything like that. 2 Q Who paid for the room? I don't know. I'm assuming it was Ali Alexander. 3 Α Q What gear -- I know you didn't bring any guns; you've already mentioned 4 5 But what gear or equipment did you bring with you to Washington, D.C.? I think I might've brought my vest, my bulletproof vest, but, you know, I 6 Α didn't wear it, but I think I brought it. I'm not sure. 7 Q Okay. So did you bring any helmets or anything? 8 9 Α No, I don't think I had a helmet. 10 Q What about plates or plate carriers? That would be included in the vest. 11 Α Okay. So there were plates in the vest? Q 12 Α Yes. 13 Q And why did you feel it necessary -- was this something normal to wear, like 14 15 a vest, when you were doing PSD for folks? I knew I wasn't going to wear it, but I just brought it. 16 I guess, why would you bring it if you didn't think you were going to wear it? 17 Q And just help me understand it, that's all. 18 19 Α I really don't know. I don't have an answer for you. 20 Q What about radios? Did you have radios with you? 21 Α No. Q Can we go to exhibit 5 at 23, Jacob? And by 23, I meant page 23. Sorry. 22 23 I'm talking like we're in court or something.

Okay. So it looks like Gray Gator says -- and this might be at the bottom of the

page. First of all, there's mention of a QRF right there. Then it looks like radio

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_	programming will also be on ruesday night, which appears to be salidary 5th.	
2	Did you take part in a radio programming on Tuesday night?	
3	A I don't know what that's about. I didn't have radios. I don't know if any	
4	of the other people did or not.	
5	Q Was it normal for you all, from people from your group, to use radios at	
6	events that you were with them at?	
7	A I I can't remember. I think in Louisville they had radios is one time I	
8	remember. I didn't have one, but I think I remember they had them in Louisville.	
9	Q What was the purpose of having the radios in Louisville?	
10	A I guess so they could talk to each other, because there was you know, I	
11	think I told you there was two different locations, a Shell station and then there was	
12	a the pawn shop, and then they had a couple car loads of people just kind of cruising	
13	around spotting things.	
14	Q Okay. So you weren't aware of the type of radios or what channel the	
15	radios were synched to	
16	A No.	
17	Q Do you know who would know that?	
18	A No. I'm not a radio guy either. I don't know anything about those.	
19	Q Okay. Can we go to page 27, Thanks.	
20	So there's a mention to burner phones on this page. Are you aware of any by	
21	Deplorable 1. Yeah, right here. "Won't have time to try to do much about it, so I'll try	
22	to pick up a burner phone before I start north."	
23	Are you aware of anybody using burner phones on January 5th and 6th?	
24	A Not that I know of. I know that on, you know, like for some of the call to	
25	actions, you know, I told you you call a number off the website, I think maybe that could	

1 have been a burner phone. 2 Q Okay. Α A temporary phone. But I don't remember specifically about January 5th or 3 6th. 4 5 I guess, overall, why would burner phones be used if you're just providing Q personal security details? 6 7 I wasn't in charge of that. I don't know why they were talking about it. So 8 I don't see any reason for it. 9 Q We can take that down, Jacob. Thank you. Can we pull up exhibit 11? 10 It looks like on January 4th, an individual -- I asked you earlier about Stephen Brown. You said you didn't know him. But it looks like a list is sent from Stephen 11 Brown to Ali Alexander, and this is an email. I'll let you get acquainted with it. 12 This is the list of the PSD we have working with us --13 I'm sorry. Can we take a break? This is running longer than I thought, and 14 Α 15 I need to text a potential client. I was supposed to be somewhere at 3 our time, so I might need to text them and --16 Please. Does 10 minutes work for you to square that away? 17 Q Α Yes, sir. Thank you. 18 19 Q Okay. We'll come back in 10 minutes. 20 Mr. Rabby. Thank you. 21 [Recess.] 22 . All right. It is 3:35 p.m. Eastern time, and we're going back on the record now. 23 24 BY

Just going back, Mr. Morelock, you described a lot of ways how the rhetoric

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Q

1	and the chat and some of the actions you might have witnessed other folks taking was
2	not normal of a regular personal security detail, right? You've said like the helmets, for
3	example, the gear. That's not what you do in a personal security detail.
4	So why did you continue acting like it was just a normal security detail as you were
5	on your way up on January 5th and 6th?
6	A Because that's how I was going to treat it. That's how, you know, I was
7	going to conduct myself, you know, like I always had in the past.
8	Q But if the people around you weren't conducting themselves that way, did
9	you think that might bleed over into your conduct or your actions?
10	A I I had made up my mind, if something crazy happened, you know, if they
11	overreacted to a threat or anything like that, that I was just going to separate myself from
12	them. So I just, you know, was under the impression that maybe nothing would happen.
13	We would do the details. If something crazy happened, I was just going to walk away
14	from the whole thing and, you know, gone sightseeing.
15	Q Got it. Okay.
16	<u>. </u>
17	Yes. Thank you.
18	BY Example:
19	Q So, Mr. Morelock, I was hoping to zoom back a little bit and go away from
20	the events of January 5th, January 6th, at least for just a couple of questions, talk about
21	more your relationship with Oath Keepers, what motivated you to join.
22	And I guess my first question on that front is: We talked a lot about the fact that
23	you wanted to join to protect folks against threats, and the threat you identified was

Α Not just Antifa. It's just, you know, the business owners that were having

24

25

Antifa. Is that right?

- their businesses burn during some of the protests that escalated into riots. There
- wasn't enough police officers, obviously, to protect these businesses or they wouldn't
- 3 have been on fire or looted. So I was just -- as an ex-police officer, it was tough to watch
- 4 that happen, knowing that, you know, the Oath Keepers would give me a chance to do
- something to help instead of just sitting on the couch like a lot of people.
- 6 Q Got it. So did you conceptualize the Oath Keepers as a vehicle for former
- 7 law enforcement to help protect individuals who were at threat?
- 8 A That's a very good way of saying it, yes.
- 9 Q Could you expand on that at all?
- 10 A I don't know how. That's what it was.
- 11 Q Okay. Got it. So on that note, you've mentioned there were other
- threats in addition to Antifa. Specifically, did you view the Black Lives Matter movement
- as a threat when you were thinking about joining?
- 14 A No, not necessarily. You know, I can understand that movement, you
- 15 know. I don't know -- their base or, you know, their grassroots, I understand it. You
- 16 know, there's been bad police shootings in the past. So, you know, I understand where
- they were coming from. It seemed to me like maybe some of their protests got hijacked
- by, you know, people with ulterior motives, other than --
- 19 Q Would those folks be Antifa who were hijacking the rallies?
- 20 A Possibly, yes. I understood that was a possibility.
- 21 Q That's good to know. So you first became motivated to join the Oath
- 22 Keepers, you said, following the murder of George Floyd and some of the protests that
- happened in the months afterward.
- 24 A Sure.
- Q Great. So I guess my question would be: How did you view the

1	relationship between those protests and some of the threats you were identify, Antifa or	
2	otherwise?	
3	А	l don't understand your question.
4	Q	Did you see those protests as being manipulated by people with ulterior
5	motives? D	id you see people coming into interrupt those protests?
6	Α	Yeah.
7	Q	Why did you see go ahead.
8	Α	Yeah. I think that was a possibility. Again, I remember even on some
9	mainstream,	you know, FOX, CNN, whatever, they were somebody was talking about it.
10	Q.	And once you got more involved in the Oath Keepers, did you hear other
11	people talk about the Black Lives Matter movement and Antifa in similar terms?	
12	А	I remember Antifa being discussed a lot more than BLM.
13	Q	But when you did hear them being discussed, how were they being
14	compared or	being analyzed?
15	А	I don't remember any comparisons or analysis. I just remember them
16	being identified as a possible threat and, you know, people that are out, you know, trying	
17	to turn, you k	know, our regular protest into a riot.
18	Q	And so people were generally sharing your view that it was possible that
19	some of these BLM protests may be hijacked by bad actors?	
20	А	I don't remember any specific discussions, but I would say probably.
21	Q	Great. So as the year went on and we moved away from the summer when
22	a lot of those	protests took place, was there continuing conversation about how bad
23	actors might	try to hijack various kinds of protests, whether it was racial justice or related
24	to the election?	
25	А	I don't remember any specifics, but I'm certain, sure, it was possible.

1	Q Great. And I guess before I move on to a different topic, I just wanted to
2	ask if there's any other time you remember Stewart Rhodes, Kellye SoRelle talking about
3	how Antifa might be related to Black Lives Matter, might be related to other perceived
4	threats?
5	A I don't remember I don't remember either of them making those
6	statements.
7	Q Great. So moving a little bit. I want to talk about your former history as a
8	law enforcement officer and how that might have influenced you to join the Oath
9	Keepers and things in that category.
10	So as a preliminary question, I wanted to ask: Were you attracted to the Oath
11	Keepers because of your background in law enforcement?
12	A I was, you know, attracted to them because, at that time, they were trying to
13	make a difference at these protests and riots. That's what attracted me, if that's what
14	you're asking.
15	Q Yes. And did you feel like you were well-suited to join their efforts because
16	of your background as a law enforcement officer?
17	A Yes.
18	Q And would you say it's fair to describe the organization as filled with a lot of
19	veterans and law enforcement, former law enforcement?
20	A Yes. Yes.
21	Q Were you aware of Active Duty law enforcement or military members when
22	you were
23	A Yes, there were a couple. I don't remember who they are, but in Lafayette,
24	Louisiana, I think there was one or two active police officers. I don't know if any active
25	officers were working in D.C. or not or not working

- 1 Q Did you ever -- go ahead.
- 2 A I don't remember any active officers affiliated with the Oath Keepers being
- 3 in D.C. I don't remember.
- 4 Q At -- in other areas when you were working with them, did you interact with
- 5 any Active Duty officers, as far as --
- 6 A The only ones I remember was in Louisiana.
- 7 Q Okay. Great. So why do you think that veterans and law enforcement
- 8 officers, both active and retired, are drawn to the Oath Keepers?
- 9 A Because they want to, you know, help out, you know, at the different riots or
- 10 protests or whatever.
- 11 Q Right. And how do you --
- 12 A It's in your blood.
- 13 Q Sure. So how do you think that their presence, the presence of veterans
- and law enforcement officers, affected the Oath Keepers as an organization -- how you
- were organized, how you planned your mission strategies, what missions you chose?
- 16 Can you talk me through a little bit about that?
- 17 A I mean, that's who the Oath Keepers were, former military, law
- 18 enforcement, I guess some firefighters, paramedics. You know, again, why those
- particular people join, I can't speak for them. I don't quite understand what you're
- asking -- or did I answer your question?
- 21 Q You answered my question, yeah. In terms of some of the internal chats,
- 22 preparation for strategy, especially leading up to the operations in Washington, do you
- 23 believe that preparation was influenced by the fact that there were a lot of veterans and
- law enforcement in the ranks?
- 25 A Yeah. I mean, that -- yes. Again, I don't quite know where you're going

with this. That -- that -- that's what made the Oath Keepers, I don't know, I guess,

effective at, you know, some of these protests, the fact that they were past military, law

enforcement. I'm not quite following you.

- Q I'm just trying to get a better understanding of how the Oath Keepers saw themselves as functioning and how they were trying to maximize their effectiveness, as you say --
 - A I can't -- I can't speak for the rest of them. Up until, you know, all this happened at the Capitol, you know, I was kind of proud to be out there, you know, volunteering for free, protecting people's businesses that, you know, I didn't know, you know, in a different State. You know, I just felt it's something I knew how to do and that I should do it, you know, as a citizen. So, you know, I can't speak for the other Oath Keepers, though.
 - Q Got it. And do you think there was an active strategy on the part of Oath Keepers' leadership to recruit Active Duty law enforcement, military members? Did you ever hear talk of that strategy?
 - A Yeah. They were always trying to grow their ranks and, you know, they -- I never went to any of them, but they would hold recruitment events, you know, like at different, I don't know, events or venues, you know, where they would try to sign people up. You know, they had their website that, you know, asks people to sign up and that sort of thing.
 - Q And so at these recruitment events, were they held to explicitly target Active Duty law enforcement or was this just a general admission?
 - A They were just general -- again, I had never attended one, so, you know, I don't know. I've just heard that they had done them in the past; you know, that they -- they didn't specifically target former law enforcement. You know, it was, they

1	wanted ex-military, military, ex-law enforcement, law enforcement, and then firefighters
2	and EMTs and paramedics. But I don't remember any particular group being targeted
3	above, you know, another subset, I guess.
4	Q And you also spoke earlier in the interview about the law enforcement
5	liaison role. So could you speak a little bit more about how day-to-day Oath Keepers
6	chapters were expected to interact with local law enforcement counterparts?
7	A To my knowledge, they weren't day-to-day. It was, you know, specific call
8	to actions. Like in Lafayette, I was assigned to be the liaison with the Lafayette Police
9	Department. There was a detective that, you know, I talked to. I introduced myself,
10	told him, you know, about how many of us there would be, and probably gave him the
11	vehicles that we would be in, and that sort of thing. But there wasn't a day-to-day
12	effort. It was, you know, call to action specific.
13	Q Operation specific. Got it. And to your knowledge, did that kind of
14	preparation or coordination occur before some of the events in Washington?
15	A I don't know.
16	Q I guess if you don't know, then you wouldn't be able to answer any further
17	questions about it.
18	More generally, how did you hear leaders of the Oath Keepers talking about the
19	importance of interacting with law enforcement, whether over the summer or as we
20	draw closer into the fall and the winter?
21	A It was just a call to action specific thing. There was no prolonged let's get
22	to know these different people or anything, that I know of anyway.
23	Q And do you recall any instances in which veterans or former law
24	enforcement or Active Duty members of either kind of service came to provide firearms
25	trainings for Oath Keepers?

1	Α	Not that I know of.
2	Q	And were there any other efforts, that you can remember, of Oath Keepers
3	to establish	rapport with sheriff departments outreach that were not operation specific?
4	Α	Not that I remember.
5		I think that's pretty much all I've got. I'm not sure if anyone wanted
6	to follow up	D.
7		?
8		BY I
9	Q	Mr. Morelock, sort of along the same lines, was there ever any were there
10	ever any do	ocuments that were produced by the government that were transmitted over
11	Oath Keepe	ers' signal chats or emails that weren't public documents?
12	А	Not that I know of.
13	Q	Got it. And continuing with what was asking, given, you know,
14	the disprop	ortionate representation of veterans and law enforcement in the Oath
15	Keepers, w	ere you surprised at how the Oath Keepers engaged with law enforcement in
16	hand-to-ha	nd combat on January 6th?
17	Α	Yes.
18	Q	Why?
19	Α	Because we always cooperated with law enforcement in the past. I don't
20	have any sp	pecific knowledge of anybody that did engage in hand-to-hand combat, as you
21	say, with law enforcement. I don't maybe I read that somewhere. I'm not saying it	
22	didn't happ	en, but, yeah, I was surprised that that was alleged.
23	Q	Got it.
24		<u>.</u> ?
25		. Can you pull up exhibit 11? I'm sorry about that. And we were

1 2 Stephen Brown to Ali Alexander. I just want to go through these individuals to see if you recognize them, similar to 3 4 the exercise we went through earlier, but this email appears to be from Kelly Meggs, 5 originally to Stephen Brown, for Oath Keepers to perform personal security detail on January 5th and 6th. Kelly Meggs --6 7 Mr. Rabby. Can you enlarge it a little bit? The Witness. Yeah, I can't read it. 8 9 . And let's scroll down, 10 BY All right. So Kelly Meggs. You talk about him. Connie Meggs. That's 11 Q Mr. Meggs' girlfriend, correct, or wife? 12 Wife. 13 Α Q And this Caleb Berry. Is this -- you mentioned a Caleb, right? 14 Yeah. I would assume, probably. 15 Α Q Yep. David Owensby. Do you know that individual? 16 Α No. 17 What about Richard Dockery? 18 Q 19 Α No. 20 Q Kenneth Harrelson, with a --21 Α I think that's Kenny. Okay. You can keep scrolling down, 22 Q What about the David Moerschel? You said no earlier? 23 I don't think so, no, not that I remember. 24 Α 25 Q Okay. Ken Bittner?

Not that I remember. Unless -- no, that's not Kenny. 1 Α 2 Q Okay. Α No, I don't think I know that Ken. 3 What about Robert Lemar? 4 Q 5 Α Doesn't ring a bell. Jeremy Brown? Is that the hotheaded Jeremy? 6 Q 7 Α Yes. 8 Just for the record, Ms. Stephanie Murphy has joined the 9 deposition. BY 10 Jeremy Brown is the hotheaded Jeremy that you mentioned? 11 Q Α Correct. 12 Okay. Graydon Young? 13 Q 14 Α Doesn't sound familiar. Terry Cummings? 15 Q You know, actually, the Genx Pat, that might be a guy from the east coast of 16 Florida. I think he might have been on one of the Roger Stone nights, but I'm not sure. 17 Q Okay. Terry Cummings? 18 19 Α Doesn't ring a bell. 20 Q Jason Dolan? Α 21 Again, doesn't ring a bell. Can we keep scrolling down, Q 22 Of course, Jeff Morelock, Whipit, that's you. 23 Α That's me. 24 Q Joe Hackett? 25

- A I know the one Joe, you know, that rode with us, you know, in Kelly's truck
- to D.C. It might be the same Joe, but I'm not sure. I don't know what his last name is.
- 3 Q Okay. Aaron Stone. You mentioned a Cat Daddy earlier. I asked if it
- 4 was Aaron Stone. This is why I was asking that, because it looks like --
- 5 A Yeah. I don't -- I don't ever remember hearing Cat Daddy's real name.
- 6 Q Okay. Was Cat Daddy in part of that caravan that rode up with you from
- 7 Florida to Virginia?
- A He might have been, but I'm not 100 percent sure.
- 9 Q Scott Thompson, Deep Sea?
- 10 A No.
- 11 Q Steven Taylor, Dr. S Florida Oath Keeper?
- 12 A No. You know, I remember the Dr. S Florida Oath Keeper. I've seen that
- in the chats before, but who it is, I don't know.
- 14 Q Looks like Eduard or what we understand to be Eduard Durfee?
- 15 A I don't know that person.
- 16 Q Alondra Propes?
- 17 A I know who that is. She was in D.C., but --
- 18 Q What was she doing in D.C.? What was the nature? How do you know
- she was in D.C.?
- A Because I remember seeing her on the 6th. Again, we'd have to get into
- that day, what happened. I know we haven't gotten that far yet.
- 22 Q Tell me where you saw her on the 6th. What she was doing, things of that
- 23 nature.
- 24 A We -- after the President was done talking and we got separated from Ali
- Alexander and five or six of his people and security, myself, Alondra, Caleb, and then one

- of Ali Alexander's -- I don't know if it was a staff or a speaker or a supporter -- we got
- separated from the main Oath Keeper group and, you know, we had to make our way to
- the Capitol on our own. But Alondra and Caleb, they weren't wearing, like, helmets or
- 4 bulletproof vests either. So --
- 5 Q But Ms. Propes went to the Capitol with you -- with you all?
- 6 A Yeah. Yeah, she was at the Capitol.
- 7 Q Okay. Was she like performing personal security detail like you all were?
- 8 A Yeah. She was supposed to be part of the group that was going to escort, I
- guess, the -- now we know they were the eight Congress people and then other VIPs. So
- she was part of Kelly's group but got -- her and Caleb both got separated from them.
- 11 Q And I know this is a little ahead, but just to be clear, you all -- did you all end
- up escorting any Congressmen or -women to the Capitol?
- 13 A Not that I know of.
- 14 Q Garboard Strake, is that Tom Burgess?
- 15 A I don't know who that is.
- 16 Q You know Tom Burgess, though, that stayed with you in your room?
- 17 A If that's Tampa Tom -- if Tom Burgess is Tampa Tom, then I --
- 18 Q Okay. Got it. Okay.
- 19 A The only Tom that I remember is Tampa Tom and I don't know what his last
- 20 name is.
- 21 Q And Tampa Tom stayed in the JW with you, correct?
- 22 A Yes.
- 23 Q Okay. Bruce Holden?
- 24 A Doesn't ring a bell.
- 25 Q Frank Marchisella?

1 Α No. 2 Q Robert Kennedy? Α 3 No. Darin Bassett? Q 4 Α No. 5 Can you scroll down a little more, for us? 6 Q David Kirk? 7 Α No. 8 9 Q Ben Parker? 10 Α Nope. Sandra Parker? 11 Q Α 12 Nope. Jessica Watkins? 13 Q Α I know the name now, I think, you know, from the news articles. And I 14 think I saw her -- I don't know if it was her or not, I'm pretty sure it was -- during the 15 President's speech, she was with Kelly's group. 16 Q With Kelly's group -- I know we're getting ahead of ourselves. Kelly's group, 17 including Jessica Watkins, they were inside the Ellipse, correct? 18 19 Α Yes. 20 Q What was -- what was the plan or why were they inside the Ellipse? 21 Α The plan was, since there was supposed to be 8, 10, 12 additional people, 22 you know, in addition to Ali Alexander and his, I don't know, five or six main staff people, 23 since there was such a large group, we were supposed to surround them and just kind of walk them up to where Alexander would be talking at the Capitol. 24

Well, I guess, why were you needed inside the Ellipse? Was there a threat

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- 1 that you felt would be inside the Ellipse for Ali Alexander and his five or six people? 2 Α I don't know. I wasn't part of that conversation. I don't know who asked 3 us. You know, again, I was just told that that's what we were going to do. Okay. , we can take this down. 4 Q I have a few other names. Don Seekerman (ph)? 5 Doesn't sound familiar. 6 Α William Cook? Q 7 Α Doesn't sound familiar. 8 9 Q Rob Weaver? 10 Α Doesn't sound familiar. 11 Q Okay. And we'll get into more specifics about the 6th shortly. We're making our way now to the 5th. I told you we're going to work chronologically. 12 So you get, it looks like, to D.C. late morning, early afternoon on the 5th. You go 13 to the JW Marriott. What did you do for the rest of the day on January 5th? 14 We got there, we checked in, myself and Tampa Tom, that is. Alexander, I 15 think I either texted him or one of his handlers or assistants. They were not at the hotel. 16
 - I think he showed up around 5 o'clock. I can't remember. When he showed up, you know, I introduced myself to him and his security, also Tampa Tom. He did a speech in Freedom Plaza. There was a stage there, so we just kind of hung out while he did that speech and then took him back -- walked him back to the hotel. We just kind of hung out in the lobby for a while, while he went upstairs.

They were, I think -- I think it -- he might have even said he was at the Capitol stage or

something giving a speech and that he would be back to the hotel.

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At some point, he decided that he was going to go out and eat. So we escorted him to a hotel where some pizza was delivered to the lobby. It was a different hotel

- 1 five, six blocks away. I don't remember which one it was. So everybody ate pizza.
- 2 On the way back -- well, actually, prior to that, he did say that he wanted to do 3 that meeting at 11 that I mentioned earlier, but on the way back, he said that that wasn't going to happen and just to be in the lobby at like 6 o'clock in the morning the next day. 4
- Let's break that down a little bit. Meeting at 11, I do remember you mentioning it earlier, and I apologize for not remembering the details. What was that 7 meeting supposed to be about on January 5th at 11?
- Α What he needed the other Oath Keepers, Kelly's group, to do. 8
 - Q Do you know if that meeting ever took place with Mr. Meggs at all?
- 10 Α No, it didn't. Not to my knowledge.

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- Q Do you know what even -- like, what he needed to do -- what, I guess, the atmosphere or what the -- I'm trying to understand what would he need him to do other than personal security detail? Did you get any indication of what that would be?
 - Α Maybe, you know, logistics, the passes that were needed to get him in to, you know, the President's speech. That got messed up the next day. It took a while for one of Alexander's assistants to get Kelly's group the passes they needed. I don't know what happened with that, other than we didn't meet up with them.
 - There was so many people there. There was a VIP gate. We were all supposed to meet there, but it got all screwed up. So, you know, the -- Kelly and his group didn't show up, but myself, Tampa Tom, his security, and his other five or six people all went in together with Alexander.
- 23 And then the rest of the Oath Keepers, I don't think they got in for another couple hours. I'm not sure. 24
- Got it. And we'll get into that when we get to the 6th. So walk us 25

1 through. You said -- what time did you escort Mr. Alexander to Freedom Plaza, 2 approximately? Α When, on the 5th? 3 Q Yes. 4 Α It was dark is all I can tell you. 5 Did you all escort him anywhere else before Freedom Plaza or was it just 6 Q straight to Freedom Plaza? 7 Α No, straight to Freedom Plaza, as far as I remember. 8 9 Q So then Mr. Alexander goes to Freedom Plaza, he speaks, and then where do 10 you go after that? Back to the Marriott for a little while and then to the other hotel where they Α 11 ordered pizza. 12 Where was the other hotel? Was it the Willard? 13 Q Α I don't remember. 14 Was it close to the JW Marriott? 15 Q Α We walked. It took us about 10 minutes to walk. 16 Do you know who you met up with for the pizza when you got there? 17 Q Α There was a lot of people there, probably 20 or 30. We were in like a little 18 19 back area. There's like a little restaurant. There was probably 20 people there. 20 Q Was Mr. Roger Stone there? 21 Α No, not that I saw. Okay. What -- I guess, when you were at Freedom Plaza, what did you 22 Q 23 observe? Did you observe any threats? What did you see? No. Everything was fine. 24 Α

What was the general tone or atmosphere at the Freedom Plaza rally on

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1	January	
2	А	There was just a lot of people.
3	Q	Did you do any type of advance work or prep work before you went to the
4	Freedom Pl	aza
5	А	No. Their their security like I said, their security was in charge. I just
6	did what th	ey told me, which was basically just kind of stand there.
7	Q	While you were at the hotel after Freedom Plaza and after going back to the
8	JW Marriott	where there was pizza, what was being discussed during this dinner?
9	А	I don't know. I wasn't I was probably there was like two little entrances
10	into this ba	ck area, so I was at one, Tampa Tom was at one. And then their or his
11	security wa	s also at the entrances. So we stayed clear of any discussions or anything.
12	Alex	ander was in a booth kind of in the middle. There was a long table that had,
13	I don't knov	v, 15 people, and then there's maybe another five people in the booth with
14	Alexander.	
15	Q	Did you recognize anybody in the booth with Mr. Alexander?
16	А	No.
17	Q	How long did you all stay at this pizza place that night?
18	А	I don't know for sure, hour and a half maybe.
19	Q	Who were you with while Mr. Alexander was in the booth? You were with
20	Tampa Tom	, but anyone else?
21	А	Tampa Tom and then also his security on and off.
22	Q	Okay. Was Kelly Meggs and any of those Oath Keepers with you all that
23	night?	
24	А	No.
25	Q	I want to go , can we pull up exhibit 12?

1	I'm going to show you some pictures and you, please, just let me know if these				
2	individuals were part of the security that you were part of the people that you were				
3	providing security for on January 5th and 6th.				
4	So, o	of course, we have Ali Alexander. This is who you're providing security for			
5	primarily.	Is that correct?			
6	А	Yes.			
7	Q	Okay. The second page, Michael Coudrey. Do you recall providing him			
8	security				
9	А	No.			
10	Q	No? Okay.			
11	You	can keep going,			
12	Nathan Martin?				
13	А	No.			
14	Q	Okay. Alexander Bruesewitz?			
15	А	He looks familiar, but I don't know why.			
16	Q	Okay. Was he because you were providing for Ali, but there were other			
17	people prov	viding it for other, I would say, Stop the Steal influencers, correct?			
18	А	Yeah. Actually, that Nate guy kind of looks familiar. He might have been			
19	there. I'm	not sure.			
20	Q	Okay. He might have been there at the JW			
21	А	No. Maybe not. The guy I was thinking of is younger.			
22	Q	Okay. And then Alexander Bruesewitz you vaguely remember or vaguely			
23	familiar?				
24	А	I'm not going to say I'm 100 percent sure he was there, but he just looks			
25	familiar for	some reason.			

1	Q	Okay. Let's go to the next one. Brandon Straka, was he part of the				
2	group?					
3	Α	Not that I remember.				
4	Q	CJ Pearson?				
5	А	Not that I remember.				
6	Q	Okay. Ed Martin?				
7	А	Not that I remember.				
8	Q	Thank you,				
9	So other than Ali Alexander, who do you end up providing security for?					
10	А	Ali Alexander is who I was				
11	Q	That's it?				
12	Α	Yeah.				
13	Q	Okay.				
14	Α	I mean, you know, we're loosely responsible for the people that were				
15	hanging out with him, but I think I even either told the security his security or whoever,					
16	if somethin	g happens, our primary concern is Alexander.				
17	Q	While you were with Alexander the entire evening, do you recall him				
18	discussing a	nything about January 6th?				
19	Α	No, I don't think so, unless just they were talking about times or something,				
20	but I don't r	remember any specific discussion.				
21	Q	So let's go through that. Were they telling you how they thought				
22	January 6th	was going to go, the plans, like, what time you're going to leave the hotel,				
23	what time y	what time you were going to go to the Capitol?				
24	А	No. That's that's what time that or that's why that meeting was				
25	supposed to	o happen at 11, so they could tell us, but it never happened. So at some				

1	point, I think, you know, after they had pizza and everything and we got back to the				
2	Marriott, I think at that point he said just be at the lobby, it was either 5:30 in the				
3	morning or 6, I can't remember what. And we just kind of played it by ear.				
4	Q	So you went in to January 6th not really knowing how the day was going to			
5	unfold?				
6	Α	Right. I was I was a little angry about it, but, you know, it was very			
7	disorganized.				
8	Q	Did you hear Mr. Alexander or anyone in his group having any conversations			
9	at all with the White House?				
LO	Α	No.			
l1	Q	What about congressional members? Did you hear any talk about			
L2	congressional members?				
L3	Α	No, not that I remember.			
L4	Q	Did you recall seeing a woman named Ms. Caroline Wren or hearing			
L5	conversations about her?				
L6	Α	Not that I remember.			
L7	Q	Was Mr. Stone around at all on January 5th and 6th with the group that you			
L8	were with?				
L9	Α	No, he wasn't with the group. He did I think he did speak on the 5th at			
20	Freedom Pla	aza, because I do remember seeing him coming in as we were going out.			
21	Q	Do you know why Mr. Stone didn't come to the rally at the Ellipse on			
22	January 6th	? Did you hear about why he didn't come at all?			
23	Α	No.			
24	Q	And, again, who was providing personal security detail for Mr. Stone on			

January 5th and 6th?

_	A	i tillik it was josii aliu soine otilei Oatii keepeis.			
2	Q	Would Mr. Green, would he have probably been in that Mr. Stone			
3	А	I don't know.			
4	Q	Were you aware that Mr. Green was serving as like an operational leader,			
5	ops lead?				
6	А	Oh, I'm sorry. Mr. Green is Mike, Whipit?			
7	Q	Yeah, Whipit.			
8	А	Yeah. I think he was kind of in charge of overall in charge of the whole			
9	D.C.				
10	Q	I guess, why do you need an ops leader for personal security details? Like,			
11	in all your years of experience of doing personal security detail, did you have ops leads?				
12	А	In all my years of doing personal security details, it was nothing like what the			
13	Oath Keep	pers wanted to do, and it was you know, again, they wanted to wear their			
14	helmets ar	nd their vests, and I made my point known that it wasn't the way things were			
15	done. Ar	nd, you know, I I told them that, but I wasn't listened to so, you know, I shut			
16	up about i	i.			
17	Q	So what was the point of having an ops lead, from your understanding?			
18	Did you receive direction from the ops lead? Like, what was the ops lead doing?				
19	А	I didn't even think about it.			
20	Q	Did you all provide personal security for Alex Jones? And, if so, who was it,			
21	for January	/ 5th and 6th?			
22	А	Not that I know of. I don't remember the Oath Keepers being assigned to			
23	him.				

You did say, though, going into January 6th, let's say, the night of the 5th and

the morning of the 6th, you were aware that you would be going from the Ellipse to the

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1	Capito	after	ward	ls?

Α Yes. 2

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- 3 Q What was supposed to be happening at the Capitol, based upon your understanding? 4
- Α 5 That Alexander was supposed to give a speech.
- Was he giving a speech with congressional members or just by himself? 6 Q
- Α I don't remember. Again, it was discussed, as you saw in those texts that, you know, some congressional people wanted to -- needed an escort or possibly needed 8 the escort from the President's speech to the Capitol, but I don't know who was going to stick around or anything along those lines. 10
 - Q What was the route? Did you all discuss the route that you were going to march from the Ellipse to the Capitol?
 - No. Again, that's what would have been nice if we did our, you know, that Α briefing on -- on the 5th at 11 p.m. It would have been nice to know. But at some point on the 5th, I did ask Alexander, hey, where do you want the rest of the Oath Keepers, you know, because when they finally showed up, you know, what do you want them to do? He's, like, I want them to escort -- help escort my people.
 - So after the President's done talking, come up to the front of the stage, they're going to let us through to kind of cut across the grass. I don't know what street we would've ended up on. But after the President was done talking, Alexander, his two security people, and four or five of his aides were let through, but they wouldn't let anyone else -- you know, myself, Tampa Tom, or the rest of the Oath Keepers go through the front.
 - I don't know if it was the Secret Service that let Alexander through or D.C. Police or who, but somebody did. So that's how we got separated from him.

1	Q	So someone, it seemed like it was special access, let Mr. Alexander and his
2	aides throu	gh but wouldn't let you through?
3	А	Correct.
4	Q	Okay. We'll get back to that point as well. When you were going into
5	January 6th	, did you think that the President was going to join you all at the Capitol?
6	А	I didn't know. I didn't hear anything about that.
7	Q	Did you have an estimate of how big the crowd size would be at the Ellipse
8	or at the Capitol?	
9	А	No.
10	Q	What were you thinking the crowd size would be in your mind on January
11	5th or 6th?	
12	Α	I just knew there'd be a lot of people.
13	Q	Had you seen the permit or anything for the Capitol?
14	Α	No. No.
15	Q	Okay. And, again, what threats, other than Antifa and just let me know if
16	Antifa was the only one were you tracking for January 6th?	
17	Α	No others that I remember.
18		Does any of the staff or Ms. Murphy have any follow-up questions
19	for Mr. Moi	relock?
20	Oka	y.
21		BY ::
22	Q	All right. So let's move on to the 6th. I know you've mentioned this a
23	little bit, bu	t I want to go through in the same kind of detail, what approximately, what
24	time did yo	u wake up and assemble and then go over to the Ellipse with Mr. Alexander?
25	А	We met down in the lobby at 5:30, 6 a.m. on the 6th. There was two

- different golf carts, so we took the golf carts to the Ellipse -- is that how you say it?

 Q Uh-huh.
- A Okay. So we took the golf carts to the Ellipse. We went to the VIP gate where Alexander gave them the credentials or something, got us our passes, went through the security screening, and then up to the -- basically, the front of the stage.

 There was like a separate kind of gate where only certain passes were allowed to come
 - Alexander, one of his security guys and a few of his people were seated, I don't know, within the first couple rows kind of towards the center of the stage, and they made the rest of us sit kind of in the back and off to the side.
- 11 Q Who provided the golf carts for you?

up closer to the stage. So we had those passes.

12 A I don't know.

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- Q Okay. Did you all make any stops at all before you got to the Ellipse?
- 14 A I don't think so.
 - Q And do you recall an incident where Mr. Alexander and others were fighting over seats or in a discussion with security about where they were supposed to be sitting?
 - A Yeah. There -- there was some discussion. I remember one of the security people saying that Alexander wasn't very popular with them, but I don't know the specifics.
 - Q Okay. Did you step up at all to help during this --
 - A No, I didn't see it. I didn't see it. I just -- I just remember one of the security guys saying one of the -- I guess it was an event security person saying, well -- because I was, like, I need to go talk to him. He's, like, well, he's not very popular with us right now, or something like that.
- 25 Q So you got -- you were separated, it sounds like, from Mr. Alexander inside

1	the Ellipse.	Is that fair?
2	Α	Yes. Inside the VIP section in front of the stage, we were separated.
3	Q	Approximately how far away were you from him at this time?
4	Α	I couldn't see him from my seat. Maybe, guessing, kind of at a diagonal,
5	because I w	as off if you're facing the stage, I was to the right of the stage, a little more
6	than halfwa	y back, maybe 20 yards from him, I guess, in a diagonal kind of.
7	Q	So what's your role when you're 20 yards away from him inside, were you
8	just at that	point a spectator of the rally?
9	А	Yep.
10	Q	Okay. Can we pull up exhibit 6, please, ? We can scroll down to the
11	bottom par	t of this page.
12	So th	nis is in the D.C. OP January 6th signal. Doesn't appear you're in this
13	because	
14	Scro	ll up a little bit,
15	So a	t 8:55 a.m., it looks like Stewart Rhodes sends this group a message, "Message
16	to Gator and	d his team from Whipit," who's Jeff Morelock.
17	We	can scroll down.
18	And	this is on January 6th at 8:55 a.m.
19	Α	Yes.
20	Q	It says: If you get your passes to go into the Trump event, go into the three
21	green crane	/light towers and come to the fence between the green cranes and the stage
22	and Whipit	will be able to see you. His text is not working. Cell calls also spotty. Link
23	up on food.	
24	So d	id you actually get together with other Oath Keepers inside the Ellipse?
25	А	Yes, eventually, after I sent that text. I don't know if I sent that text to I

- think -- you asked me about Whip. I think I did text him, because he was kind of overall
- 2 in charge, saying that I got separated from Kelly's group and if you ever get a hold of
- 3 them, this is where I am.
- 4 So I think that's how that -- what you're showing on the screen came about.
- Q And when you said -- you meant Ali's group, not Kelly's group, right? Did you say Ali's group?
- 7 A No. We got separated from Kelly's group.
- 8 Q Oh, Kelly Meggs' group?
- 9 A Yeah.
- 10 Q Kelly Meggs' group was with you with Ali Alexander when you all were riding 11 over to the Ellipse as well?
- 12 A No. No. They were coming from the different hotel and we were, again,
 13 supposed to meet by the VIP, but there were so many people that we never got together
 14 until after the event had started.
- 15 Q But it sounds like you and Kelly Meggs' group did reunite inside the VIP area?
- 16 A Yes.
- 17 Q Thank you, You can take those down.
- What were you all doing during the rally? Like, what was going on with you and Kelly's group?
- A I didn't sit with Kelly's group. It was just me, Tampa Tom, and Alexander's other security. We were sitting in the right. The event security made Kelly's Oath Keeper group sit in the very back row in the middle.
- Q Are you familiar with Kelly's group having to remove their gear and leave it outside of the --
- 25 A Yes. Yes.

1	[4:17 p.m.]	
2		BY STATE OF THE ST
3	Q	Why made you say that?
4	А	I kind of wanted to tell them, I told you so, that you didn't need to wear that
5	in the first p	lace.
6	Q	But, I guess, what were they saying about having to leave their gear outside
7	of the event	1?
8	А	Just that they had to leave their gear.
9	Q	What gear was it that they had to leave outside?
10	Α	Their helmets and vests.
11	Q	Do you know if Kelly's group or you were working with the Secret Service at
12	all inside the	e Ellipse?
13	Α	I wasn't working with the Secret Service, and I don't think they were either.
14	Q	Did you hear them mention anything, especially Ms. Watkins mention
15	possibly wo	rking with the Secret Service inside the event?
16	Α	No, I don't remember that.
17	Q	Were you or Kelly's group responsible for any jobs or any tasks inside the
18	Ellipse?	
19	Α	No.
20	Q	What did you observe during the actual rally at the Ellipse? What was the
21	mood? W	hat was the atmosphere like? What were you thinking as you were
22	А	Yeah. I was so cold. You know, being from Florida, it was freezing up
23	there. My	jacket was too thin. I was basically bundled up and had my jacket way
24	above, as m	uch as high as I could get it over my head. I was just trying not to freeze.
25	You know, I	didn't really pay attention to any of the speakers. I was just freezing to

1	death.		
2	Q Gotcha. I guess, were speakers still speaking when you guys left, when Mr.		
3	Alexander left?		
4	A I don't think so. I think the President had just finished talking. I'm not		
5	sure.		
6	Q So none of the speakers stood out to you, none of their rhetoric about going		
7	to the Capitol? I mean, I know you said you're not a political guy. Did you now start to		
8	think this is a super-political event and day overall?		
9	A I really wasn't paying much attention.		
10	Q Okay.		
11	I guess, just going back to the gear left outside of the Ellipse, like, help us		
12	understand the magnitude, right? Was this just, like, a helmet and a plate vest, or was it		
13	more than that?		
14	A I don't know what everybody had. I just know the majority of them were		
15	wearing helmets and, you know, the ballistic vests. But I didn't see them that day		
16	before they came in, so I don't know what they were wearing.		
17	Q So Ali Alexander leaves. He goes to the special access point. You're not		
18	allowed to go through that special access point. So help us understand how you got out		
19	of the event.		
20	A We met up with four or five of his people just outside of the VIP gate. It		
21	was still inside, you know, the secured area by the Secret Service, so it was still in the		
22	secured perimeter, but it was outside of the VIP section.		
23	I think maybe one of his assistants it was a female. Her name might have been		

Mallory. I'm not sure. But someone coordinated their five or six people into that area

where we met up with Kelly and his group, and we all walked out of the Ellipse secure

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- area and onto a street. I don't know what street it was.
- So, at that point, Kelly said that they were going to go put their gear on and we
 were all supposed to go over there together. But that's when the crowd just, you know,
 meshed in with us and we got separated.

So it was myself, Alondra, Caleb, and there was a short African-American lady. I think her name might've been Chantel or Chanel. She was kind of heavyset. And I guess she had, at a past event or something, been a speaker or somehow was associated with Alexander.

So it was our little group, got separated from the main Oath Keeper group. We somehow made our way to Pennsylvania Avenue and started walking towards the Capitol, because I was just gonna try to get in touch with either Alexander or -- I think it was Mallory and see if we could meet up once we got to the Capitol, because I didn't know where his stage was or where he was supposed to, you know, give his speech.

So, as we're going up Pennsylvania Avenue, we got to Freedom Plaza, where -- it's the end that has the guy on a horse. I don't know if you're familiar with --

- Q Oh, wait. I'm going to stop you, because we're going to walk through this.
- 17 A Okay.

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18 Q So I'll go through that.

At this point, though, did you understand that Ali was gonna be leading a march to the Capitol? Like, what was your understanding of this march --

- A No. I just thought he was going to be giving his speech there.
- Q And I don't recall if you answered this, but what was the mood inside the Ellipse? Like, were people angry? Were they cheering? Like, what was the mood?
- A It just seemed like a regular crowd. I mean, nothing stood out as far as being a problem.

- 1 Q So, comparing the January 5th Freedom Plaza crowd to the Ellipse crowd,
- we've heard from other witnesses that it was a very different environment. You're
- 3 telling me today it was the exact same environment?
- 4 A s far as I know. It didn't seem -- you know, I mean, I -- nothing stood out
- 5 to me as far as being a problem.
- 6 Q And --
- 7 A I was --
- 8 Q I'm sorry.
- 9 A Yeah. I was, you know, more specifically just doing what I do as a
- bodyguard, looking for immediate threats, and not paying attention to the whole
- 11 situation.
- 12 Q Got it. Okay.
- And, again, I think you might have touched on this, but just to make sure we're
- 14 clear. Who did you leave with? Tampa Tom?
- 15 A Who did I leave with?
- 16 Q Yes.
- 17 A From -- after the speech was done, the President was done speaking? No, I
- left with -- somehow I got -- Tampa Tom, I got separated from him. So who I left with
- was four or five of the Alexander people, Caleb and Alondra, the two other Oath Keepers.
- 20 But Tampa Tom I got separated from.
- 21 Q And was Ms. Propes -- was she by herself or was she with her husband?
- A She was by herself, as far as I know.
- 23 Q Okay. And what was the approximate time that you left? Do you recall
- 24 that?
- 25 A I don't remember. Early afternoon.

1	Q	When you left the Ellipse, were you tracking that there might've been any
2	kind of tr	ouble at the Capitol at all?
3	А	Not when I left. The first I heard of problems at the Capitol was after we
4	got there	
5	Q	Okay. So you weren't tracking that there was anything going on at the
6	Capitol u	ntil you actually arrived at the Capitol?
7	А	Correct.
8	Q	All right.
9	So	o let's go back then. When did you actually get back with Mr. Ali
10	Alexande	er you mentioned Freedom Plaza. When did you actually reconnect with him?
11	А	On the 6th, after the speech?
12	Q	After the speech, you walked
13	А	l didn't.
14	Q	You didn't get back with him?
15	А	When he went through that secured area, I didn't see him again.
16	Q	You didn't see him again the rest of the day?
17	А	Correct.
18	Q	Okay.
19	So	o, then, walk us through I think you were starting this then. So go back to
20	walking ι	us through how you got to the Capitol, who you were with. Were you providing
21	security a	at this time?
22	А	We were looking out for the lady, Chantel or Chanel or whatever her name
23	was. Sh	ne was having trouble walking, to the point where she started crying, so we had
24	to stop se	everal times, because her feet were hurting. So that slowed us down also.

So we got kind of adjacent to where that horse is, the horse statue at Freedom

1	Plaza.
2	Q Yep.
3	A The Oath Kelly and his group, we kind of met up there, not on purpose but
4	on accident. Somehow we got ahead of them. So then we all started walking as a
5	group again up Pennsylvania, but the Oath Keepers were walking a lot faster than this
6	lady could walk, with her sore feet. So I stayed back with her, Alondra stayed back with
7	her, and I think Caleb went on with Kelly and his group. So we got separated again.
8	When we got to the Capitol, the two groups kind of met again. They cut through
9	some grass; I don't know north, south, east or west up there. So they went through
10	some grass, and they ended up at a security gate.
11	The arms were down, but there was a female D.C or not D.C., but Capitol Police
12	officer there. There were no barricades on the sidewalk, so a lot of people were just
13	going up the sidewalk. She wasn't making any effort to stop anybody or tell anybody if
14	it was a restricted area or not. So I assumed that that was open to the public.
15	Q I want to stop you there.
16	A Okay.
17	Q You left after the President's speech. You didn't hear noise or see tear gas
18	or anything like that at the Capitol? I know you understand the Capitol Police officer
19	wasn't saying, "Stop, this is a restricted area," but you didn't hear any commotion, see
20	any commotion, nothing like that?
21	A Not we went through that gate, and then we turned left, up some it was
22	like, a curved, circular sidewalk. So we were kind of on that circular sidewalk. The
23	Capitol would've been to my right. And that's
24	Q Actually, that's perfect. That's perfect.

, could you play exhibit 14 for us, please?

1	[Video shown.]
2	All right. You can take that down. Thank you,
3	BY ::
4	Q So that video was at about 1:48 p.m. of Alex Jones and Ali Alexander arriving.
5	They're ahead of you. You can see all the people; you can hear the whistles and stuff.
6	I guess, tell us again, what were you thinking? And the Capitol is off to the right,
7	so it appears similar to what you were just saying.
8	A Again, I don't know I don't know where I was up there or where that video
9	was shot. But, again, after I got and the first time I knew there was an issue is, we
10	went through that gate I told you about, probably walked 20 yards around the circular
11	sidewalk to the left. And, at that point, some people were coming by we had met up
12	with Kelly and his group. But some people came by and said, "The Capitol was
13	breached. The Capitol was breached." And then I saw some a van loaded with riot
14	police show up. And I was like, we need to get out of here.
15	Q So when did you reconnect with Kelly and his group? Before you got to the
16	grounds or right when you got in?
17	A Well, we reconnected at Freedom Plaza, but, again, they started walking too
18	fast, so I stayed back with the lady that couldn't walk. So, after we went through the
19	gate, probably 20 yards, 30 yards from the gate is when we caught back up with Kelly and
20	his group.
21	Q What was Kelly and his group discussing at this point? What were they
22	saying?
23	A They were standing around. Kelly looked at me and said something to the
24	effect of, what should we do? I said, I think we should find Ali Alexander's group and get
25	them out of here.

1 Q And what was his response? 2 He was like, "Well, the Capitol has been breached." And I'm like, "Yeah. Α We need to stay out of the way of the police." Because more riot cops are showing up. 3 You know, "We don't want to be a part of the problem. Let's get out of here." 4 He's like -- he said, "This is our opportunity." I'm like, well, I'll be fine by myself, 5 but I'm not going to leave this lady, you know, that can barely walk in this crowd full of 6 7 people, you know. Basically, do what you want. But --Q "This is our opportunity." What did you take that to mean? 8 9 Α I took that to mean, based on prior Oath Keeper call-to-actions where we 10 always help the police, that they were going to try to help with some kind of crowd 11 control or something along those lines. 12 So, in this moment when you're talking about Capitol Police or riot crews 13 coming and Mr. Meggs tells you the Capitol has been breached and he responds back, "This is our opportunity," you took that to mean to defend the police officers? 14 Α 15 Yes. I had no reason not to. Help me understand that. 16 Q Α I had no reason not to. 17 18 Q Okay. 19 Where did you go afterwards? So you have this conversation with Mr. Meggs. 20 Help me --21 So, after they walked away --Wait. How close are you to the Capitol when you're having this 22 Q 23 conversation? We're on the side of it. The building was to my right. Kind of in the 24 Α

25

middle on the side.

1 Q So there was the part with all the scaffolding and the inauguration stage. 2 That's the west side of the Capitol. You were on the other side? Α I think so. 3 Q Okay. 4 Α We were to the left of Pennsylvania Avenue, if that helps. 5 That does. 6 Q So can we pull up exhibit 15, please, 7 So this video is around 2:17. It's Mr. Alex Jones giving a speech on the east side 8 9 of the Capitol. We'll play it, and then I'll just ask a few questions about this. 10 [Video shown.] 11 Thanks. BY 12 13 Q So Alex Jones gave a similar speech to that on the east side of the Capitol at 2:17 p.m. Did you see that speech? 14 Α 15 No. Q Did you hear any discussions about the speech? Are people breaking 16 through on the left side of the Capitol as you were on the east side of the Capitol? 17 Α No. 18 19 Q Did you see Ali Alexander give a speech on the east side of the Capitol? 20 Α No. 21 Q Around what time were you on the east side of the Capitol with Mr. Kelly Meggs? 22 I don't remember. 23 Α So I'll just -- I'll give you a time. Mr. Meggs led what's been called by the 24 Q 25 DOJ "Stack One" up the steps into the Capitol at 2:36 p.m. You said you were with

Mr. Meggs on the east side of the Capitol right before. 1 2 Did you get the impression he wasn't going to the Capitol with a stack of other folks in his group? 3 I didn't know what they were gonna do. They walked away from me, and I 4 5 went to where Chanel was, or Chantel. So it ended up just her and I. 6 And, at one point, I walked a little farther up the sidewalk -- I told her to wait 7 where she was -- because I was gonna see if I could see a stage or something where Alexander might be. But I walked, I don't know, 20, 30 yards, saw there was just so 8 9 many people there, riot police arriving. I went back to her, and I'm like, "Look, it's safer 10 if we just leave and go back to the hotel." And that's --11 Q Were there any discussions going on in the Signal chats at this time about --Α I wasn't looking at that time. 12 Q Did you see Mr. Meggs and the other folks actually going up the steps into 13 the Capitol? 14 Α No. I mean, later I saw a video of it, but --15 What did you think when you saw the video of it later? 16 Q Α I was disappointed in them. 17 18 Q Were you -- why would you be disappointed if you thought they were going 19 in to defend police officers? 20 Well, because I -- when I saw it, I knew that they had already gone in. Because, at one point, after I got back to the hotel -- because there was also a curfew 21 22 gonna be enacted, so we hurried up, got back to the hotel. I walked the lady to a 23 corner, where her husband picked her up.

But later that evening somebody posted a video of them inside the Capitol.

then I think after that is when I saw -- the next day is when I saw them going in single-file

24

1	line up the stairs.
2	Q I guess, though, I'm just trying to understand, right, like, they told you, "This
3	is our opportunity." So you knew there had to be something, and you just told me it
4	was to defend law enforcement. So where is this disappointment coming from, I guess?
5	A That's after the fact, after I knew that they had gone inside.
6	Q After you'd known they had gone inside, though, couldn't they have been
7	going inside to defend law enforcement?
8	A It's possible. But when I said I was disappointed in them, it's after I knew
9	they went inside for whatever political reasons or whatever and they weren't there to
10	help law enforcement. Once I knew that, then I saw the videos, it might've been the
11	next day, it might've been a couple days. Again, I didn't take notes for all this stuff. It
12	was just, you know, I was disappointed. Two days later, I quit the Oath Keepers.
13	Q I guess I'm trying to, though did it ever click with you on
14	January 6th those messages of "putting pressure on Senators," did it ever click with you
15	on January 6th, maybe that's what this is about?
16	A No.
17	Q Okay.
18	A I'm sorry I'm sorry if I appear to be an idiot, but, no, it didn't.
19	Q I'm just trying to understand. That's all. We weren't there, so we're
20	trying to understand what was going through your mind.
21	Can we pull up exhibit 5 and go to page 29, please, .
22	BY ::
23	Q So it looks like in your Florida Oath Keeper chat there is a lot of chats going
24	on during January 6th. And one, in particular, on page 29 can we scroll down here?

Can we go down a little more?

1	Okay. So it looks like Darin Bassett sends a text.
2	Maybe a little further down.
3	Do you see it? Maybe it's above it.
4	There's a message from Darin Bassett about how people are on the Capitol steps,
5	right?
6	So you're not tracking any there it is. "More cops armed with M4's North
7	Capitol steps."
8	You're not tracking any of these messages at all while you were
9	A No, not until after I got back to the hotel, is when I think it was the first time
10	I looked at any of the chats.
11	Q Okay. And were you tracking the South Carolina Oath Keepers doing
12	anything, like, an operation, at all?
13	A Not to my knowledge, no.
14	Q Same question regarding the second stack that went in that was an Oath
15	Keepers stack.
16	A I don't know anything about that either.
17	Q So you were just, like, not listening in on the Signal chat or talking to
18	anybody, other than when Mr. Meggs said, "Now is our opportunity"? That was the las
19	time you were really talking with anybody?
20	A Until about maybe 7, 8 o'clock at night. I sent out a text. I think it was or
21	the Florida chat; I don't remember. You know, I asked, "Is everybody okay? Did
22	everybody make it back to the hotel?"
23	A couple people I don't remember who they were checked in and said, "Yeah,
24	we made it back."

And then I said, "Okay. Somebody pick me up tomorrow morning at 7:00."

1	. Can we go to page 30 of this exhibit,
2	BY ::
3	Q And just help me square this. Because you legit, it seems, at, like,
4	4:30-something and I'll give you exact times.
5	Scroll down to Morelock or "Whipit."
6	So 4:43: "Whipit and Garbord and our protectees are safe."
7	Isn't Ali Alexander your protectee?
8	A I don't remember texting that. I don't know who Garbord is or I don't
9	remember. If that text came from me, I have no idea what I meant by that.
10	Q Is it fair to say that you're telling the group that you and Ali Alexander are
11	safe?
12	A Oh, you know what? Maybe Garbord is Tampa Tom.
13	Q That's what I was guessing earlier.
14	A Okay. Yeah. So, yeah, then maybe Garbord is Tampa Tom, and I don't
15	remem until now. That tells me that that is Tampa Tom's last name. So perhaps I
16	asked him that day, you know, when I sent that text that we're back safe.
17	Q Yeah. I'm more worried about or focused on the "protectees" part of it.
18	Who were the protectees that you're putting in this chat?
19	A Alexander, I guess. Maybe his group was back by then. I told you I didn'
20	pay attention to time. You know, it just you know, it was very cold, and, again, I
21	wasn't paying any attention to the time.
22	Q I'm not asking about the time. I'm looking at the timestamp right here, an
23	it says 4:33.
24	I guess I'm just so were you just lying to the group when you said the
25	protectees, as in Ali Alexander, are safe, if you didn't know?

1	А	No. I think that we were probably all back at the hotel, or I doubt I
2	would've se	nt that.
3	Q	Do you recall checking in again with Ali Alexander at 4:30-ish in the
4	afternoon a	t the J.W. Marriott?
5	Α	You know, I remember talking to the person I think is Mallory, because, right
6	after I sent	that, I think at some point she texted me and said they were gonna try to have
7	food deliver	red because there was a curfew. But I didn't hear back from her about the
8	food or any	thing else, so
9	Q	You weren't going off what you saw. It was, like, a message communique
10	to you from	this Mallory person?
11	Α	Correct.
12	Q	Okay.
13		Can we go up a little bit on this page 30,
14		BY ::
15	Q	It's a message from "Sea Deep." He says, "At my FOB. Standing by if
16	needed."	
17	l tak	e "FOB" to mean "forward operating base," again, similar to QRF-type
18	language.	What does this mean?
19	Α	I don't know.
20	Q	And this is at 3:56.
21	Α	I do not know.
22	Q	So you're telling me you don't know anything about a QRF or FOB, "This is
23	our chance'	'? Like, you're not tracking anything at this time?
24	Α	No, I acknowledged to you earlier that I knew the QRF was going to wait in
25	Virginia. E	But I didn't know anything about the FOB, whatever that is.

1	Q	The forward operating base.
2	А	Yeah. I don't know what that meant or what that person's talking about.
3	Q	Okay.
4	Did	you meet up with Mr. Stewart Rhodes or Mike at the Capitol around 4:00
5	p.m.?	
6	А	No.
7	Q	Were you with Mr. Ali Alexander when he recorded a video on the rooftop in
8	D.C. after the breach	
9	А	No.
10	Q	of the Capitol?
11	А	No.
12	Q	What time if you sent that message around 4:33, compared to when you
13	sent that message, when did you get back to the hotel?	
14	А	I don't know. I don't remember.
15	Q	What was your understanding of what the Oath Keepers were doing at the
16	Capitol as, you know, you were walking back and at the Capitol?	
17	А	I didn't know.
18	Q	And you were just relying that Ali Alexander was safe because of the
19	message yo	ou received from the woman with the sore feet?
20	А	Yes no. It wasn't the woman with the sore feet that sent that.
21	Q	Oh, it was the Mallory woman, correct?
22	А	Yes.
23	Q	Tell me how your understanding of what folks did that day unfolded as the
24	evening we	ent along.
25		And we can just scroll, for example let's just scroll these

1	messages,
2	BY Example :
3	Q So you submit at 4:38 4:33. That means you have said this. You're on
4	the Signal chat at this point. People got tear gassed and pepper sprayed. "Just did the
5	same."
6	What are you thinking is going on if everyone got tear gassed but you didn't?
7	A Well, I wasn't there, so I knew I wasn't going to get tear gassed. I know
8	how riot police work. That's why I wanted to get off the property, so I wouldn't, one, be
9	in their way was the main thing. I knew people were gonna get tear gassed and pepper
LO	sprayed and, you know, whatever other tactics they were going to use. So I knew it was
l1	in my best interest, and anybody that would listen to me, to get away from the Capitol
12	and get back in the hotel, where it was safe.
L3	Q Did you have any fear that night that you might get, you know, lumped in
L4	with this group of folks who had just gone into the Capitol?
L5	A No. I knew I didn't do anything illegal. I didn't know of any plans or
L6	anything, so I knew I could not be lumped in. I knew I might have some explaining to do,
L7	but I knew I didn't commit any crimes.
L8	Q Got it.
L9	When did you leave the D.C. area?
20	A The next morning, on the 7th. Kelly Meggs picked me up. If you want to
21	know, his wife, Connie, was with him. Joe was there, and I think Caleb was there.
22	Yeah, Caleb was there. And Tampa Tom squeezed in with us. And we drove back to
23	the Comfort Inn in Virginia, got in separate vehicles.
24	Tampa Tom didn't ride with us back to Florida. He went with someone else; I

don't remember who. But myself, Kelly Meggs, his wife, Joe, and Caleb drove back to

1	Florida.		
2	Q Okay. And did you see Ali Alexander the day after the event?		
3	A No.		
4	Q What was the mood of the individuals as you all were leaving D.C. the next		
5	day?		
6	A They seemed worried.		
7	Q What were they saying they were worried about?		
8	A Just that they might have done something to get them in trouble. Again,		
9	me being an ex-cop, they weren't very vocal about any of this, because they knew,		
10	basically, how I thought.		
11	I remember one discussion where one of them said something about they couldn't		
12	believe that one of the rioters was shot, the person that was going through the window		
13	inside the building. I said, "I absolutely understand that, and had I been that police		
14	officer, I probably would've taken that shot too." You know, and that made me kind of		
15	unpopular with them also.		
16	But, you know, I don't know if they trusted me to talk in front of them. They did		
17	say that they did try to help the police, that at one point a Capitol officer was getting		
18	surrounded by some stairs and they kind of shooed some protestors, or rioters, I guess, at		
19	this point, away from that particular officer.		
20	And then they also told me that a Capitol Police officer told them to go guard a		
21	window. But they didn't elaborate on any of that.		
22	Q Okay.		
23	I guess you just told us about the individual that was shot. Did you express		
24	disapproval overall about what had happened the day before?		
25	A Yes.		

1	Q What did you say, like, on the way back?		
2	A I think just I couldn't help myself, but, at one point, I think I said, you		
3	know, I told you so, that we needed to get the people we were supposed to protect and		
4	get off the Capitol Grounds and get out of the way.		
5	But then I shut up, because I didn't want them to throw me out on the side of the		
6	road, and it was a long walk back to Florida.		
7	Q When did you all arrive back in Florida?		
8	A It was probably 11:00, 12:00, right around midnight I guess.		
9	Q Of January 7th?		
10	A Correct.		
11	Q So, I guess, just thinking we've gone through January 5th and 6th and the		
12	lead-up to it. Thinking big picture, right you mentioned there was QRF. You were		
13	familiar with that. You mentioned how you saw guys getting out of the car		
14	. You can take the exhibit down,		
15	BY ::		
16	Q You mentioned how you saw guys getting out with guns and ammunition in		
17	the Virginia hotel. So that tracks to me that you were kind of thinking that this could go		
18	sideways.		
19	And then on January 6th you heard Mr. Kelly Meggs talk about, "This is our		
20	opportunity." And instead of going with him to defend police officers, which you		
21	thought he was going to do, you walked away.		
22	So, in my mind, you walked away because you knew there was, like, a possibility		
23	that this could go wrong, right?		
24	A No, sir. You're not correct at all. I walked away with the lady that was		
25	part of Alexander's group who it was my duty, when I volunteered to protect her, to get		

1	ner out of the crowd, out of the situation, away from any danger, you know, and off the			
2	property.			
3	Q	But you felt no discomfort over Mr. Meggs saying, "This is our opportunity"?		
4	That just sa	just sat perfectly fine with you on January 6th?		
5	Α	Yes. Yeah. Again, it's just based on what we had done in the past. We		
6	had always	helped the police. So, you know, it seemed perfectly reasonable that that's		
7	what they were gonna do.			
8	Q	I'm just trying to reconcile this. You talked about hotheads and other stuff,		
9	but now you're saying you were perfectly comfortable with the situation. That doesn't			
LO	seem to go hand-in-hand.			
l1	Α	Well, I'm sorry you believe that.		
L2	Q	No, I mean, help me help me get to the point where it makes sense, right?		
L3	You were lil	ke, I didn't want to be associated with the hotheads, which I'm assuming were		
L4	Mr. Meggs	s group, and then you walked away. Like but you didn't sense any type		
L5	of			
L6	Α	Sir, nothing that happened that day made sense. It was a it was tragic.		
L7	I mean, it ju	st you know, people lost their heads. And, you know, I did what I could to		
L8	protect mys	self, to protect the people that, you know, I was supposed to protect, and get		
L9	out of law e	nforcement's way because I knew they were coming in hot and heavy.		
20	And	, you know, like I said earlier, I told Kelly, "We need to get out of here and get		
21	out of the w	yay." He made the decision to go do whatever he did. So, you know		
22	Q	So, I guess, do you take January 6th as people losing their heads and not as,		
23	like, a pre-p	lanned opportunity?		
24	Α	It seemed more, to me, spontaneous, a spontaneous event, instead of a		

planned event.

1	Do any other staff members have any other questions about
2	January 5th or 6th?
3	Okay.
4	BY ::
5	Q So, looking now in retrospect, just walk us through how January 6th, to the
6	best of your knowledge, affected the Florida chapter of the Oath Keepers.
7	A I don't know. I quit, you know, within a day or two. So I know several of
8	them got arrested, so I don't know if they're still a group or what's going on with them.
9	You know, I don't I don't like reading those kind of articles or anything, so I don
10	follow that. I've got just about any kind of keyword for "Oath Keepers" or "riot" or
11	"January 6th" blocked on whatever I can block.
12	It was a terrible day, terrible situation, and I don't want anything to do with it.
13	hate talking about it.
14	Q Did you not talk to, like, Ms. Propes or anyone else the day after, like, "Wov
15	that was crazy"? Nothing like that?
16	A Kelly Meggs sent me the I guess it would be the either the 7th or 8th
17	think it was probably the 8th he sent me a picture of the guy that was stealing the
18	podium that was all over the TV, sent me a picture, saying, "This guy shouldn't be hard to
19	find." And why he sent me that, what he meant, I don't know. I think I probably just
20	replied with "LOL" or something.
21	And, you know, I ended up blocking as many Oath Keeper numbers as I could,
22	because I don't want to hear from them or be in touch with them.
23	Q Were you tracking at all I know you mentioned Ranger Doug earlier.
24	Were you tracking the North Carolina chapter of the Oath Keepers disaffiliating with the
25	national chapter of Oath Keepers after the fact?

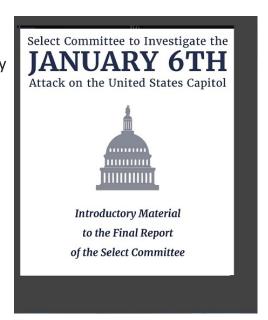
1	Α	No, I don't remember that happening, or I didn't hear about it, I don't think.	
2	Q	Did you all stop in North Carolina on the way back?	
3	Α	No.	
4	Q	So and this is another just, like, big-picture Oath Keepers let's stick	
5	pre-Jan. 6t	h. Do you know who was responsible for maintaining the financial records of	
6	the Oath Keepers?		
7	А	No.	
8	Q	How about for the Florida chapter?	
9	А	No.	
10	Q	Do you know if the dues were handled locally or nationally? Do you recall	
11	that?		
12	А	I think we paid nationally on the website, I believe.	
13	Q	Did you all take as the Oath Keepers, did you solicit donations? And, if	
14	so, was it d	so, was it done by chapter or nationally?	
15	А	I think there was a donation link on their website.	
16	Q	Do you recall the Oath Keepers using any form of cryptocurrency?	
17	А	No.	
18	Q	Do you know who was responsible for spending the money in the chapter or	
19	the national level for the Oath Keepers?		
20	А	No.	
21		Do any other staff members have any questions before we wrap	
22	up?		
23	Allı	right.	
24	We	ll, thank you, Mr. Morelock, for sitting here and talking to us. We really	
25	appreciate it.		

- 1 And, with that, we will go on recess. So thank you.
- 2 The Witness. Thank you.
- 3 [Whereupon, at 4:51 p.m., the deposition was recessed, subject to the call of the
- 4 chair.]

1	Certificate of D	Deponent/Interviewee	
2			
3			
4	I have read the foregoing	_ pages, which contain the correct t	ranscript of the
5	answers made by me to the quest	tions therein recorded.	
6			
7			
8			
9			
10		Witness Name	
11			
12			
13			
14		Date	
15			
16			

The disastercenter.com downloaded the transcripts from the Houses Select Committee's website shortly before the Republican's took control of the House.

The DisasterCenter.com is making a low-cost black and white print edition of The Executive Summary, also called Introductory Materials, available on Amazon in paperback and hardcover editions;



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