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5 SELECT COMMITTEE TO INVESTIGATE THE

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

7 U.S. HOUSE OF REPRESENTATIVES,

8 WASHINGTON, D.C.

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12 DEPOSITION OF: ROBERT PEEDE, JR.

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16 Wednesday, January 19, 2022

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18 Washington, D.C.

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21 The interview in the above matter was held via Webex, commencing at 10:03 a.m.

22 Present: Representative Lofgren.

AUTHENTICATED
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INFORMATION
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1 Appearances:

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4 FOR THE SELECT COMMITTEE TO INVESTIGATE

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

6

7 [redacted] INVESTIGATIVE COUNSEL

8 [redacted], RESEARCHER

9 [redacted] SENIOR INVESTIGATIVE COUNSEL

10 [redacted], CHIEF INVESTIGATIVE COUNSEL

11 [redacted] CHIEF CLERK

12 [redacted] RESEARCHER

13 [redacted], SENIOR INVESTIGATIVE COUNSEL

14 [redacted] STAFF ASSOCIATE

15 [redacted], DETAILEE, DEPARTMENT OF HOMELAND SECURITY

16 [redacted] INVESTIGATIVE COUNSEL

17

18

19 For ROBERT PEEDE, JR.:

20

21 EDWARD GREIM

22 PAUL BROTHERS

23 GRAVES GARRETT

1

2 [redacted] It is 10:03 a.m. on January 18th, 2022.

3 We are here for the deposition of Robert Peede, Jr., conducted by the House

4 Select Committee to Investigate the January 6th Attack on the United States Capitol,

5 pursuant to House Resolution 503.

6 This deposition is being taken remotely via Webex.

7 This will be a staff-led deposition. The members may choose to ask questions.

8 At this time, I don't see that any members are present, but when they come in, I

9 will try to identify them. And I will ask that [redacted], who is professional staff with

10 us, feel free to interrupt me if I miss the appearance of someone along the way.

11 My name is [redacted]. I'm an investigative counsel with the select committee.

12 There are several folks also on the select committee staff with us today. [redacted]

13 [redacted] who is chief investigative counsel. [redacted] is a senior investigative counsel,

14 as is [redacted]. And [redacted] is with us from the professional staff. And

15 [redacted] is professional staff. I also see [redacted] from our professional staff

16 and our Chief Clerk [redacted] who are here. [redacted] is also participating. He is

17 senior counsel to the vice chair of the select committee.

18 Under the House deposition rules, neither committee members nor staff may

19 discuss the substance of the testimony given here today until and unless the committee

20 approves the release of the deposition.

21 Mr. Peede, you and your attorneys will have an opportunity to review the

22 transcript.

23 I'd note that under House rules, Mr. Peede, you may not have -- or you may have

24 your attorney present. I recognize that you do have both of your attorneys present with

25 you. But counsel for other individuals may not be and therefore are not present.

1 In other words, the only lawyers who are present here today are your lawyers and
2 lawyers from the select committee. There are no lawyers from any other government
3 agencies present.
4 At this time, I'd ask, Mr. Peede, that your lawyers identify themselves for the
5 record.
6 Mr. Greim. Eddie Greim, Graves Garrett.
7 Mr. Brothers. Paul Brothers, Graves Garrett.
8 [redacted] Thank you.
9 Mr. Peede, before we get started, I'll just go over some ground rules for the
10 deposition.
11 First, as you probably heard me say before we got started, we do have official
12 reporters transcribing our conversation. And you may have also heard the prompt at
13 the beginning that the video feed is being recorded, but the reporters' transcription will
14 be the official record of this proceeding.
15 For that reason, and also because we are proceeding remotely via video
16 conference, it's important that you wait to answer each question until I am finished, and I
17 will do my best to wait to ask or follow up until you're finished.
18 It's also important to remember that the reporter can't note any nonverbal
19 responses, like nodding your head or shaking your head. So it's important that you
20 respond to each question with an audible verbal response.
21 In terms of the substance of your testimony this morning, we ask that you just
22 give complete answers to the best of your recollection. If my question is unclear, just
23 ask for clarification. If you don't know the answer, just let us know that as well.
24 You may refuse to answer a question only to preserve a privilege that's recognized
25 by the select committee. If you refuse to answer a question based on a privilege, then

we can either proceed with the deposition and return to the issue later or we can seek a ruling from the chairman on the objection. If the chairman overrules the objection, then you would be required to answer the question.

Finally, I'd remind you, as I do for all witnesses, that it's unlawful to deliberately provide false information to Congress. Doing so could result in criminal penalties, including under Title 18 of United States Code, Section 1001.

In terms of logistics, we're happy to take breaks whenever you might need it. Or if you would like to consult with your attorney, we can certainly do that. We have the technology to put you in breakout rooms, but it may also just be easier for all of us to turn our cameras off and go on mute and for you all to retreat to sort of a different virtual space to have a conversation if that need arises. We're happy to accommodate.

Because the deposition is under oath, I would ask that you please raise your right hand and be sworn in by the official reporter.

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

The Witness. I do.

[redacted] Thank you.

Mr. Peede, could you just state and spell your name for the record?

The Witness. Sure. It's Robert Louis Peede, Jr. Robert, R-o-b-e-r-t. Louis, L-o-u-i-s. Peede, P-e-e-d-e, Jr.

[redacted] Thank you, Mr. Peede.

We're going to be showing you some exhibits on the screen through the screen-sharing function as we go through.

So at the very beginning, I would ask that, [redacted], if you could just pull up exhibit 1.

1 Mr. Brothers. And, [redacted] before we begin, I have some objections to make just
2 to preserve for the record. So I don't know if now is the best opportunity to do that, or
3 if you still have some more introductory matter you want to go through.
4 [redacted] Sure. No. In fact, I should have stopped to ask that. Why don't
5 you go ahead and put that on the record, Paul.
6 Mr. Brothers. Okay. So Mr. Peede is preserving the following objections for
7 the record today. We're not asserting these objections, obviously, to prevent Mr. Peede
8 from appearing or to refuse to answer the committee's questions, but merely to preserve
9 these objections for the record in the event further document production or deposition
10 testimony is required by the committee of Mr. Peede, he could then raise these
11 objections.
12 The first objection is that the committee is not properly composed. Mr. Peede
13 objects to the issuance of his subpoena because the committee is not properly
14 composed. The resolution authorizing the select committee provides for the Speaker to
15 appoint 13 members of the committee, but requires the Speaker to appoint five of these
16 13 members after consultation with the Minority Leader.
17 The Speaker failed to comply with this requirement. None of the members of
18 the committee were appointed in consultation with the Minority Leader. The Speaker
19 objected to the Minority Leader's requested appointees and appointed all of the
20 committee members on her own.
21 The Speaker's failure to properly compose the committee invalidates all the
22 committee's activities, including the issuance of the subpoena.
23 The second objection we're preserving for the record today is that Mr. Peede's
24 subpoena was not properly issued. It's similar to the first objection in that it pertains to
25 the composition of the committee.

1 As I just noted, all members of the committee were appointed by the Speaker, and
2 none were appointed in consultation with the Minority Member. The lack of
3 appointments in consultation with the Minority Leader deprives the committee of having
4 a ranking member. This is denoted by Representative Cheney holding the title of vice
5 chair rather than ranking member.
6 The lack of the ranking member prevents the committee from properly ordering
7 the taking of a deposition. The rules of the committee require the chairman to consult
8 with the ranking member when ordering the taking of depositions. The lack of a ranking
9 member means by definition this consultation did not occur in this case. Due to the lack
10 of consultation, the subpoena for Mr. Peede's deposition was not properly issued and is
11 invalid.
12 And, finally, Mr. Peede raised several objections in his document production,
13 including his objection that his document production and deposition testimony is not
14 pertinent to a committee function that coincides with a valid legislative purpose because
15 the committee has all the information it needs about the rally to inform any legislation it
16 may wish to propose.
17 Mr. Peede preserves this objection and any other objections he raised in his
18 document production, as well as common law objections, and does not waive any of the
19 objections I have just covered by appearing and testifying today.
20 [redacted] Thanks for that, Paul.
21 Obviously, the select committee disagrees with the objections and your
22 characterization. But I also understand that those objections are not being interposed
23 to prevent Mr. Peede from testifying today. And so with that, I think it's appropriate for
24 us to move forward.
25 I will note, though, I think this is an appropriate time for us to reference a letter

1 that we received this morning from Jonathan Su, who is deputy counsel to the President.
2 And we have marked it as exhibit 15.
3 [redacted] could you pull that up?
4 Mr. Peede, this is a letter. It's dated today, January 19th, 2022. As you can see,
5 it's a letter on White House letterhead addressed to your attorneys, Mr. Greim and Mr.
6 Brothers. And in sum and substance, the letter acknowledges that you would be
7 deposed by the select committee this morning.
8 And in the letter it says, "As you are aware, in light of the unique and
9 extraordinary nature of the matters under investigation, President Biden has determined
10 that an assertion of executive privilege is not in the national interest and therefore is not
11 justified with respect to particular subjects within the purview of the select committee.
12 "Those subjects include events within the White House on or about January 6th,
13 2021; attempts to use the Department of Justice to advance a false narrative that the
14 2020 election was tainted by widespread fraud, and other efforts to alter election results
15 or obstruct the transfer of power.
16 "President Biden, accordingly, has decided not to assert executive privilege as to
17 Mr. Peede's testimony regarding those subjects or any documents he may possess that
18 bear on them."
19 I'll just say that, based on the correspondence that we received from your
20 attorneys, and also the objections that were just raised, I don't believe that an executive
21 privilege objection has been raised on your behalf. But I just wanted to put this on the
22 record in case it does become a concern as we go through these questions.
23 Do you understand that the President has waived or has decided not to assert
24 executive privilege as to your testimony on the subjects identified in the letter?
25 The Witness. I do.

1 [redacted] Okay. Thank you.

2 All right. With that, I think we're ready to go forward.

3 EXAMINATION

4 BY [redacted]

5 Q Let's start by looking at exhibit 1.

6 Mr. Peede, exhibit 1 is the subpoena issued by the select committee on December

7 9th, 2021.

8 [redacted] you can scroll down.

9 I'll note that this exhibit contains the subpoena itself. A cover letter from the

10 chairman is the second page. Following that is a document schedule with production

11 instructions. And then following that are copies of the House rules and regulations

12 regarding conducting depositions.

13 Mr. Peede, I would just like to confirm that you are the Robert Peede who's

14 named in the subpoena.

15 A It appears to be the subpoena I received. Yeah, I am the Robert Peede that

16 it would be talking about.

17 Q And you understand that you're appearing here today pursuant to the

18 subpoena?

19 A Correct. Yes, I do.

20 Q But first, this subpoena required the production of documents that were

21 described in the schedule attached. On the day that documents were due, your

22 attorneys on your behalf produced approximately 13 pages of documents, which I think

23 consisted of three emails to what we understand is your personal Gmail account with

24 some attachments that may have been included with those emails.

25 We understand that for the time period covered by the subpoena, you may have

1 been an employee at the White House and, therefore, may not have access to your
2 official White House accounts. But I'll say, we also believe that you used your personal
3 cell phone to exchange text messages regarding information that was covered by the
4 subpoena. So I just want to ask you, did you search your cell phone for responsive text
5 messages?
6 A Yes, I did.
7 Q And is that cell phone number [redacted]?
8 A Yes.
9 Q Did you, during the time period covered by the subpoena, use other cell
10 phones that were personal to you?
11 A No other cell phones that were personal to me.
12 Q And in that search for your cell phone, did you find any responsive text
13 messages?
14 A I believe that there was -- I don't believe there were any responsive text
15 messages on that -- I'm just trying to think back -- on my personal cell phone.
16 Q Do you use any kind of retention policies? I'll try not to use a lawyer word.
17 There are features on phones that would not save text messages, or if you got a new
18 phone, you might not have it.
19 Do you have any reason why you would not have text messages from this time
20 period on your personal cell phone?
21 A Yes, I do. As a longstanding security and frankly filing system to keep my
22 life sane is texts are not responsive or I tend to delete them. That's real-time. That's
23 something I've done for well over a decade.
24 I use it more as a tickler system when I text emails. If there's a text in my in-box,
25 then it means there's still action on it, there's a reason I need it. If I do not need it, I

1 delete those texts.

2 Q Okay. Fair enough.

3 Did you search any other personal electronic devices outside of your Gmail

4 account for responsive documents?

5 A Besides my Gmail, I also looked at my business email, which was not being

6 used at that time, which was [redacted] There were no

7 responsive emails. Obviously, I wasn't using it while I was at the White House.

8 Additionally, I searched my iCloud account to see if there were any backups in the

9 iCloud account for texts, and there weren't. My iCloud does not preserve text

10 messages.

11 Q And other than the deletion protocol, action protocol you described for your

12 text messages, are you aware of any actions that you took over the last year that would

13 have resulted in deletion or destruction of documents that you otherwise would have in

14 your possession and be called for by the subpoena?

15 A No.

16 Q And then when you left the White House, did you take with you any physical

17 documents that would have been called for by the subpoena?

18 A No.

19 Q All right. I would like to ask you some questions about your professional

20 background. Could you tell us how you are currently employed?

21 A Am I currently employed? I am the sole employee of my LLC, the

22 aforementioned Event Communications Group, LLC.

23 Q And is that the sole employment you've had since leaving the White House

24 in January 2021?

25 A Yes, it is.

1 Q Between the time period that we're examining in the select committee,
2 roughly election day 2020 and January 20th, 2021, what was your employment status?
3 A I was employed as a Deputy Assistant to the President and Director of
4 Presidential Events.
5 Q How long had you held that position at that point?
6 A At that point, there was a break in service. I was employed by the White
7 House from the day of President Trump and Vice President Pence's inauguration until
8 approximately May of 2019 when I left the White House to work for the Trump-Pence
9 campaign. And I returned to service at the White House at approximately July of 2020
10 and stayed there.
11 So I left the job but came back for the same employment, same job, in July
12 of 2020, and remained until President Biden's inaugural.
13 Q Between May of 2019 and July of 2020, what was your job title with the
14 Trump Presidential campaign?
15 A Director of Advance.
16 Q And was that the only position you held within the 2020 Presidential
17 campaign?
18 A Yes. Yes. And I should clarify that my employment was through my
19 company, Event Communications Group. I was not an employee of the Trump
20 campaign. I was a consultant.
21 Q Between the inauguration in 2017, January 2017 and May of 2019, were you
22 also a Deputy Assistant to the President and the White House Director of Presidential
23 Advance?
24 A From the inaugural, I originally was Deputy Assistant to the Vice President
25 and Director of Vice Presidential Advance from the Inauguration Day in 2017 until

1 approximately September of 2017, when I transferred and became Director of
2 Presidential Events.
3 Q So then from September 2017 through May of 2019 was when you worked
4 Presidential advance as opposed to Vice Presidential advance?
5 A Correct.
6 Q Could you explain in maybe layman terms what it means to work advance at
7 the White House?
8 A The advance as in different administrations have different policies. The
9 standard Republican thing is that we're responsible for all event logistics for the President
10 outside the official White House grounds.
11 So nothing, for example, nothing inside of the White House -- the West Wing, for
12 example -- would we be in charge of, but anything outside the 18 acres worldwide would
13 fall under the Office of Presidential Advance. So event logistics.
14 Q And I'll just sort of skip ahead briefly. Is the Ellipse considered the White
15 House grounds or outside that 18 acres?
16 A That would be outside the 18 acres. It's not White House property. It
17 belongs to the Department of Interior and the National Park Service.
18 [redacted] And, [redacted] we were just joined by Ms. Lofgren.
19 [redacted] Thank you, [redacted]
20 Thank you for being here, Ms. Lofgren.
21 BY [redacted]
22 Q Mr. Peede, is there any difference in terms of the advance responsibilities if
23 you're doing Vice Presidential advance versus the Presidential advance, just in terms
24 of -- I understand logistics may be different -- but in terms of job description duties, that
25 kind of thing?

1 A Basically, the exact same.

2 Q Now, before we get through sort of the substance, I just want to run through

3 a list of names that are likely to come up and just confirm that you know or don't know

4 these people and what your relationship to them was during this time period between

5 November 2020 and January 2021.

6 The first person is Justin Caporale. Do you know him?

7 A Yes.

8 Q And what's your relationship to him?

9 A He was a former employee of mine. He was at the Trump campaign. Also

10 a friend and coworker.

11 Q And you know what, I realize I didn't cover your employment before joining

12 the Trump administration in January 2017. What were you doing before January 2017?

13 A How far do you want me to go back?

14 Q The preceding 4 years.

15 A I was -- lived -- I was -- I had a separate audiovisual company based in Utah.

16 I also worked through that company on the Trump campaign leading up to the 2016

17 election -- so I guess you could call it the Trump-Pence 2016 campaign -- once again as a

18 consult doing both audiovisual things and then also I was serving as Vice President

19 Pence's, at the time candidate Pence's, Director of Advance.

20 Q Now, do you have before 2017 a professional or employment relationship

21 with Event Strategies Incorporated?

22 A Yes, I was a founder of Event Strategies when it started in 2000 -- I guess in

23 2000 -- you know, a stockholder. I did that until, approximately, I think, 2012, when I

24 moved -- my family and I moved to Utah. I started a separate company. I was -- I did a

25 lot of consulting work with them.

1 But I divested from Event Strategies per White House Counsel's Office
2 recommendations. I started a divestment process with them when I entered the White
3 House in 2017. That was a buyout of my shares.
4 Q So with respect to ESI then, which I use to refer to Event Strategies --
5 A Understood.
6 Q -- you were -- am I correct to understand you were solely a shareholder
7 during the Presidential campaign, or were you actually also doing work on behalf of ESI
8 for the Presidential campaign?
9 A No, I would bill ESI as a consultant. So ESI could hire my company as a
10 consultant to do those events. I was a passive shareholder, you know, just like
11 shareholders in IBM.
12 Q And Tim Unes, U-n-e-s, also a founder and shareholder of ESI?
13 A Correct. Tim Unes was the founder, president, and a shareholder.
14 Q And during the time period that I think we're going to discuss with you,
15 Justin Caporale was not formally employed by ESI. Is that true to the best of your
16 knowledge?
17 A Was not employed? I don't have any information on the current ownership
18 status of that or employment.
19 Q Who was Max Miller in relation to your position in the White House during
20 this time period November 2020 through January 2021?
21 A During that time, Max Miller, once again a coworker, a friend, and he
22 was -- he returned to the White House after the campaign, after the election night. He
23 returned to the White House. I don't have the dates.
24 Q Was he in a different office in the White House? Did he work for you?
25 Did you work for him? What was that relationship?

1 A He was in a different office, even though it was the -- an office previously
2 occupied by the director of press events at the White House, which we didn't have at that
3 time. He did not work from our office, but we worked closely together.
4 Q Alexandra Stone, who is she?
5 A We'd have to clarify. I know multiple Alexandra Stones. If you're
6 referring to the Alex -- Alexandra Stone that worked in the White House --
7 Q Yes.
8 A -- in the Office of Management, I guess, she is -- I believe her title may have
9 been Director of Room 1, which is a White House office.
10 Q What does Room 1 do? Do you know?
11 A It -- as the best way -- I'm trying to describe it in layman's terms. They are
12 who deal with the operations inside the White House. They help facilitate people, you
13 know, appointments coming in to see the President or staff members. They also handle
14 any type of the internal logistics at the White House that the Advance Office
15 doesn't -- that the Advance Office is not involved in.
16 Q Do you know of an individual named Brian Jack?
17 A Yes.
18 Q How do you know Mr. Jack?
19 A He was a coworker at the White House.
20 Q And do you remember his job title at the White House?
21 A I believe at that time it may have been Director of the Office of Political
22 Affairs. That may not be the correct title, but something of that nature.
23 Q Do you know an individual named Jared Small?
24 A Yes.
25 Q Did he work in your Office of Presidential Advance?

1 A Yes. Jared Small was one of the permanent lead advance -- staff advance
2 officers that were in the White House working for me.
3 Q Anthony Ornato, do you know him?
4 A Yes. He was --
5 Q And how do you know -- go ahead.
6 A He was my direct report. He was Deputy Chief of Staff for Operations at
7 the White House.
8 Q When you say "direct report," there is, I think, maybe two ways that could
9 be understood depending on who --
10 A Oh, I'm sorry. I report directly to him. That my -- that he oversees
11 my -- completely my office.
12 Q And Katrina Pierson, do you know her?
13 A Just from a -- her being in events. I doubt she could pick me up -- pick me
14 out of a lineup.
15 Q But you did not have an ongoing working relationship with her. Is that fair
16 to say?
17 A Yes, that is fair to say.
18 Q And is it also fair to say that you had interactions with Dan Scavino at the
19 White House?
20 A Yes.
21 Q And Mark Meadows?
22 A Very rarely.
23 Q Okay. But during this time period, both Mr. Scavino and Mr. Meadows
24 worked at the White House in the Oval Office?
25 A They appeared to. I don't know their, you know, their status. But they

1 were there, yes.

2 Q Some other names that have come up with respect to the Ellipse event, just

3 to confirm that you know them.

4 Hannah Salem?

5 A I do know her. She is a former employee of mine.

6 Q And Megan Powers?

7 A Once again, a former employee of mine.

8 Q Do you know Caroline Wren?

9 A Socially. I never really worked with her, but we did some of the same

10 events together.

11 Q Okay. And Maggie Mulvaney?

12 A Yes. Somebody I worked with at the campaign.

13 Q And these last four people -- Hannah Salem, Megan Powers, Caroline Wren,

14 Maggie Mulvaney -- you know them from either social interactions or professional within

15 the world of either the Trump campaign or the Trump White House?

16 A Correct. They were either at the campaign or at the White House.

17 Q Do you know Ross Worthington?

18 A Yes.

19 Q Do you interact with him while in the context of doing advance work at the

20 White House?

21 A Not on an everyday basis. There are some times that the speechwriting

22 department would need to know -- we -- I would call it local flavor.

23 So if we were in an area, let's say, you know, a historic park, or something of that

24 nature, and the advance team had found out local information that would be helpful in a

25 speech -- that there is a World War I veteran, for example -- we would be able to feed

1 that information back to speechwriting so that the President could remark about this, you
2 know, 100-year-old veteran there. But just things of local flavor, not in -- not for
3 content.
4 Q Understood.
5 Do you know Taylor Budowich?
6 A Yes, I do.
7 Q And how do you know Mr. Budowich?
8 A I'm trying to determine. I probably met him at the campaign. When I was
9 there, we would have run across each other, you know, on different events.
10 Q Is that the 2016 or 2020 campaign?
11 A It would have been the 2020 campaign. I don't remember meeting him
12 before that. It's possible. But I don't know that he was involved in 2016.
13 Q Do you know Andy Surabian?
14 A The name sounds familiar, but I can't place ever meeting that.
15 Q What about Arthur Schwartz?
16 A Don't remember that name either.
17 Q Okay. This draws out, I think, a good sort of background upfront question
18 for you to answer, which is, how do you handle the division between official White House
19 work and Presidential campaign work as someone who has done both?
20 A Are you talking about in reference to my job as Director of Advance during
21 that time, the time period of the subpoena?
22 Q Well, so you -- let me maybe frame it differently.
23 I think you said that you returned to the White House in July of 2020, right?
24 A Yes.
25 Q So the Presidential campaign was still going on at that point?

1 A Yes.

2 Q So are there rules or informal policies that you would have to follow to be

3 careful about, you know, discerning between work you're doing officially for the White

4 House versus work that's in service in the Presidential campaign?

5 A There are rules and policy. Obviously, there are Hatch Act provisions.

6 In my case, I worked closely with White House counsel at the time. There is a -- I

7 was obviously subject to public financial disclosures. And I also received an ethics

8 approval from the White House Counsel's Office to coordinate with the campaign.

9 Obviously, the Office of Presidential Advance is one of the rare offices that has to

10 work with political entities because, no matter what, he's the President of the United

11 States, no matter who the President is, if they're running for reelection or not. So the

12 White House controls all the events whether they're official or political.

13 We don't make political decisions, but we still send White House people to do

14 official events. Obviously, it's a different ruling for Federal agencies, but at the White

15 House it's different.

16 Q Well, you answered my next question, which was just to clarify that as far as

17 White House advance work goes you have to work on all of the events, whether it's a

18 political campaign event or something more ceremonial, official. Is that right?

19 A Yes, there is a longstanding provision that the Director of Presidential

20 Advance is always official. So no matter what, he's the President to me, to the role

21 of -- not to me, but to the Director of the Office of Presidential Advance, because we have

22 to work on all events.

23 Q So with respect to the Ellipse event held on January 6th, 2021, was that

24 considered a campaign event, a private event where the President was invited to speak, a

25 White House official event? How would you characterize that in terms of how you had

1 to consider it?

2 A That would be more of a question for White House counsel or the Office of

3 Political Affairs. It would not have been a campaign event because the campaign had

4 disbanded or had done that. You would have to check with them. The actual -- for

5 me, it doesn't make a difference of which one it is.

6 So I would say -- suggest that the White House Counsel's Office or the Office of

7 Political Affairs would have the answer to that question.

8 [redacted] Before I move on to ask some more specific questions about

9 particular events, I'll just pause and see if anyone has follow-up questions about sort of

10 the general background information we've gotten from Mr. Peede about advance work.

11 [redacted] No. Thank you, [redacted].

12 BY [redacted]

13 Q All right. So, Mr. Peede, following the November Presidential election in

14 2020, you may be aware that supporters of President Trump held rallies across the

15 country.

16 There are two notable dates with respect to events held in Washington, D.C., the

17 first one being November 14th, 2020, which was second Saturday following the

18 Presidential election. And, in particular, there was a large event held on Freedom Plaza

19 by an organization called Women for America First.

20 Did you do any work or provide any assistance relating to events held in

21 Washington, D.C., in November 2020?

22 A No.

23 Q We know that the President did a drive-by of Freedom Plaza in the

24 limousine, which I know is sometimes referred to as the Beast, on November 14th.

25 Were you aware that the President did a drive-by of that event?

1 A Only by via media.

2 Q So you did not have any knowledge of that drive-by ahead of time.

3 A No, I did not.

4 Q Did you later learn how that drive-by came to happen?

5 A No. I mean, I just -- I have just seen the media reports. I was actually on

6 the, I believe, on the receiving end of that motorcade.

7 Q What does that mean?

8 A It means where he was en route to, I was working that day. I believe that

9 you said that was a Saturday?

10 Q Yes.

11 A I was on the receiving end of that.

12 Q So just to make sure I understand, are you saying that the President was

13 destined for an offsite visit and you were waiting for him when he did that drive-by at

14 Freedom Plaza?

15 A Yes. Correct.

16 Q But you don't otherwise know how he came to sort of do a circle around

17 Freedom Plaza that day?

18 A No, sir.

19 Q There was later a similar event held by Women for America First on Freedom

20 Plaza on December 12th, about a month later. That day in Washington, D.C., there were

21 other groups gathering. One of the sort of larger organizations was one that went by

22 the name Jericho March.

23 Each one of these events involved people marching around the city, including to

24 the Supreme Court, for various rallies.

25 Did you provide any work or assistance related to events in December of 2020 in

1 Washington, D.C., outside of the, you know, official White House events that you may
2 have been a part of?
3 A No.
4 Q The President in Marine One flew over Freedom Plaza that day, on
5 December 12th. Do you have any knowledge how that came about?
6 A No.
7 Q Were you aware that the President had flown over Freedom Plaza in Marine
8 One on that day?
9 A The same way, via media.
10 Q So separate and apart from official assistance questions, were you aware
11 that after these and other events in Washington, D.C., after the election, November,
12 December 2020, that there were violent scuffles in the streets of Washington between, I
13 guess, I should say, opposing groups after these rallies?
14 A Just via media.
15 Q Can you just tell us whether the context of 2020, by which I mean there is
16 summer 2020 when there is various sort of social justice, civil rights protests across the
17 country, and then into the election and post-election season, whether concerns about
18 violence played any role in how you handled advance for the President during this time
19 period?
20 A It did not change the logistics that I handled. I would refer things of
21 security nature to the United States Secret Service who is the exclusive thing. But from
22 my standpoint, our events were built the same way.
23 Q Setting aside any official responsibilities that you had, did you as a private
24 citizen provide any guidance or assistance to the President's supporters during this
25 November 3rd through January 6th time period?

1 A No.

2 Q Moving on to the planning for the January 6th events, do you recall when

3 you first learned that there would be rallies in support of the President on January 6th?

4 A I saw media probably in December at some point. There was no plan when

5 I learned of that of the President attending anything.

6 Q [redacted] if we could pull up exhibit 2.

7 Mr. Peede, this is an exhibit that has a log of tweets that were sent from the

8 President's Twitter account. As you can see, the date range here is between

9 December 18th, 2020, and January 7, 2021?

10 A Okay.

11 Q Reverse chronological order.

12 So if we go down to page 12, [redacted] And there is the one that's highlighted in

13 the middle of the page for December 19th. There you go.

14 I'll tell you, Mr. Peede, that the formatting of this doesn't show exactly how it

15 would have looked on Twitter. So I can just represent to you that what this tweet was

16 was -- the last portion of this, where it says, "Big protest in D.C. on January 6th. Be

17 there, will be wild," that was the tweet. And then the text that precedes that was a

18 retweet, was text that was captured within the tweet the President sent out.

19 Do you know what prompted the President to start promoting January 6th as an

20 event to be in D.C.?

21 A No, it's outside my wheelhouse of, you know, for doing event logistics.

22 Q When you as the Director of Advance see the President start to promote a

23 particular date but it's not a date that you have on your calendar, does that prompt you

24 to ask questions of people to find out, "Hey, what's this about? Do we need to be doing

25 anything"?

1 A It will -- it's something that I will, you know, put into the back of my head.
2 But we see so many dates and potential ideas that never come. If I acted on every idea
3 that came through, I would be the busiest man in Washington.
4 So until the hierarchy starts, you know, above me, starts telling us that we, you
5 know, that we should start taking action, which includes myself and the United States
6 Secret Service and the White House Military Office, I don't react on them.
7 Q So do you recall when that official sort of call comes to the White House
8 Advance Office regarding the President's involvement with January 6th?
9 A I don't recall a specific date. I would say it would be late December or early
10 January.
11 Q All right. [redacted], if we could go to page 10 on exhibit 2. It's also
12 highlighted December 27th, 2020, at 5:51 p.m.
13 The President tweeted, "See you in Washington, D.C. on January 6th. Don't miss
14 it. Information to follow."
15 So I just want to note that's at 5:51 p.m. I will tell you that we have received
16 records and information indicating that Justin Caporale, who was ultimately the sort of
17 main event program planner for the Ellipse rally, he indicated that he got a phone call
18 from someone at the White House shortly before this tweet went out. And then about
19 10 minutes after his phone call, which he said was to confirm that Event Strategies was
20 involved in January 6th, this tweet came out.
21 Hearing that, does that help you remember how or whether you were aware of
22 the January 6th event in the context of the President announcing, you know, don't miss it
23 on December 27th?
24 A The specific tweet and hearing conversations, that would have been, you
25 know, confirmation. Confirmations would have come from outside my office. The

1 timing appears to be what I, you know, what I remembered, which was late December,
2 early January.
3 Q Do you recall reaching out to Justin to confirm that ESI was involved with the
4 logistics of planning January 6th?
5 A I talked to Justin extremely often, so I'm sure that our conversation
6 happened along those lines after I was notified that the President would be attending.
7 It could have been me calling Justin. It could have been Justin calling me.
8 Q Let's call up exhibit 3.
9 Mr. Peede, exhibit 3 are excerpts from call data records from a cell phone number
10 used by Max Miller. If we go down to here, December 27th, you can see -- it uses
11 military time, but we can see here at 1716, which is 5:16 p.m.
12 And, [redacted], if you go back up to the top just for the context so we can say what
13 these columns are.
14 You can see here the first column says record open date and time, which just gives
15 the date and time of when the call starts; the called number, which is the number
16 receiving the phone call. CPN is an acronym that the cell phone companies use to refer
17 to essentially the call placing the number. So the first number is who is receiving it, and
18 the second number is who placed it. And SOU refers to the number of seconds that a
19 phone call lasts. And so 60 seconds would be a minute, 600 seconds would be
20 10 minutes, that timeframe.
21 A Okay.
22 Q So if we go back down with that context, we can see here at 5:16 p.m. there
23 is a phone call from your number to Max Miller's number that lasts a little bit more than
24 10 minutes, and then another call from you to Mr. Miller, shorter, a little less than
25 3 minutes, at about 6:19 p.m.

1 Immediately following that phone call, the records reflect that Mr. Miller's phone
2 number, which starts 216, called the number 315 associated with Justin Caporale.
3 That's a little less than 10 minutes.
4 Then, following that phone call, the 216 number, Mr. Miller calls your number,
5 and you speak for a little less than 2 minutes.
6 Then, following that phone call, there's a phone call from Mr. Miller to Anthony
7 Ornato, Deputy Chief of Staff, another about three-minute conversation.
8 With that context in mind in this time period, are these conversations, at least
9 your conversations with Mr. Miller on the evening of December 27th, about this event on
10 January 6th?
11 A There is no way for me to know. These are people I talked to every day.
12 It's been over a year. I certainly don't remember individual phone calls.
13 Q Well, let me just ask you then, without trying to pin it to a specific date and
14 time, are you able to tell us to the best of your recollection how the January 6th event
15 unfolded to you in terms of who was involved, who was going to plan it, and them trying
16 to involve the White House in helping to coordinate the presence of the President?
17 A Again, I'm sorry. Could you repeat that? I just want to make sure I
18 answer it correctly.
19 Q Yeah, well, and it was a bit wordy. I'm just trying to get -- I can appreciate
20 that these events happened more than a year ago, so you may not remember specific
21 dates and phone calls.
22 So to the best of your recollection, are you able to tell us in your own words how
23 you came to learn about an event being put on with Justin Caporale's supervision and the
24 efforts to bring White House Advance into the loop to help coordinate the President's
25 participation, if that was possible?

1 A To the best of my recollection, I can give you the standard procedure that we
2 use, without being able to recall exactly how it was over a year ago, because for this
3 event, it was -- for me, it was just -- it was another event that we were planning.
4 Typically, we would get a confirmation either through Mr. Ornato's office or
5 whoever held that office at the time that an event was being added. That would usually
6 go to me, the head of Secret Service, the PPD operations person, and along with the
7 White House Military Office, which includes the Mil Aides and White House
8 Communications Agency.
9 We would be notified of that event. We would be given information on who
10 the -- I want to call it a host POC would be. So that would be a third party, whether it be
11 a government agency, a political entity, a nonprofit, you know, or just a third party, a
12 venue host if it was at an arena or convention center, and we would immediately start
13 reaching out to coordinate that.
14 I would assign an advance team to that event through my office, and the advance
15 team would immediately take over all the direct coordination with the host and report
16 back to me as issues arose or decisions had to be made.
17 Q You used a couple of acronyms. I just want to make sure we clarify for the
18 record.
19 PPD?
20 A Presidential Protection Division. So that's the Secret Service division that is
21 directly responsible for protecting the President. Just the Secret Service. It's not
22 considered any of the White House protection, which is a different organization. So
23 Presidential Protection Division.
24 Q And am I correct in assuming that PPD and Advance work together but don't
25 answer to each other in terms of -- you don't control them and they don't control you?

1 A Absolutely. It is very much a coworker situation. Secret Service is
2 absolutely responsible for the protection of the President and all security arrangements
3 with local law enforcement, Federal law enforcement. Staff, we work closely with them,
4 we will argue our points, they will argue their points. But we -- neither one answers to
5 the other.
6 Q And is it fair to say then that you would provide information to PPD to help
7 them do their job? Or what's the sort of -- I'm just trying get a sense of how PPD might
8 go about gathering information that's necessary to provide security for the President
9 when he's off campus?
10 A When he's off campus, my typical role -- and since I don't recall exactly how
11 this went I will give you the way that it has worked for the last 4 years for me as Director
12 of Advance, is that I talk or go to the Office of the Director -- the Operations Director for
13 PPD, who would -- is in charge of the scheduling of all their teams, to talk about events
14 that were ongoing, issues, for example, that were ongoing at a site, and in a lot of cases
15 events that I understood were coming up that the Secret Service may not be tracking
16 because they have a much closer timeframe there that they're worried about with their
17 limited manpower. And I would talk to them.
18 But on a daily basis, I would coordinate with the Operations Division, who was also
19 housed in the White House complex.
20 Q So it's my understanding that -- you mentioned Anthony Ornato as Deputy
21 Chief of Staff -- that Mr. Ornato had been detailed from the Secret Service. Is that right?
22 A I don't know of the exact legal -- you know, if there was a detail. But he
23 was formally the -- what I consider the, you know, the head of PPD, so in charge of the
24 President's protection, is his -- what we call detailee, DL.
25 Q Were you involved in briefing Mr. Ornato or anybody from PPD about what

1 you expected from an Advance perspective for January 6th?

2 A From an Advance perspective, that would certainly fall inside of my purview.

3 Q Do you recall any specific conversations about -- that fell into sort of this -- I

4 think of it as a Venn diagram. There's Advance and there's PPD and there's obviously

5 things that you both are concerned about.

6 I'm trying to get a sense of what from your vantage point were, if any, security

7 issues being discussed, safety or otherwise, for the President on January 6th?

8 A I don't -- I would not have briefed on security questions directly. I would be

9 involved in discussing concerns I may have for a particular venue based on the fact that

10 I've been doing Presidential advance since 1991.

11 Q Now, did you have any discussions like that regarding the Ellipse rally?

12 A I had concerns that there was a potential that the host organization was

13 looking at Freedom Plaza, just based on my experience of doing this for 30 years, that it

14 was a site that was highly likely to be inherently complex for the Secret Service, but it's

15 not impossible for the Secret Service to protect, even though that's their decision, and

16 also that it would dramatically shut down the city just for the security footprint.

17 Q So then --

18 A That's based on my experience from decades of doing this. The Secret

19 Service, obviously, has control of that information.

20 Q Yeah. So tell me more about that then with -- particular to this event.

21 We knew that originally there is a permit filed for Freedom Plaza for January 6th, and the

22 event ultimately was held on the Ellipse.

23 Were you part of conversations to kind of help move it to the Ellipse?

24 A I don't recall the exact way it went down, but I can clarify my general -- my

25 general memory is that I would have called the host organization and said that there is -- I

1 have significant concerns about Freedom Plaza, and that you should look at different
2 venues.
3 Q Do you recall specifically talking with Amy or Kylie Kremer, who are the
4 leaders of Women for America First?
5 A To my knowledge, I never met them until the morning of January 6th. I
6 was just introduced to them.
7 Q But did you speak --
8 A Best of my recollection I did not talk to them before.
9 Q Okay. So when you say speaking to the hosts that were putting on the
10 event, is it possible that that's a conversation happening with Justin Caporale?
11 A It's highly likely. Justin was my deputy at the campaign previously, so we
12 would have had an extremely close working relationship.
13 Q So let's take a look at exhibit 4. Exhibit 4 is a text exchange. I recognize
14 you're not on this, but I want to show it to you to give some context to sort of what's
15 happening with respect to the January 6th event. It's a text message exchange between
16 Caroline Wren, who is the blue text, and Justin Caporale, who is the gray text?
17 A Okay.
18 Q On December 26th at 11:14 a.m., Ms. Wren writes to Justin, "Do you know
19 who is organizing the January 6th rally in D.C.?" And he responds, "I thought it was
20 Women for America First, but I do not believe it is. I'll find out for you today."
21 And then if you scroll down. Later that day he responds, "Hey, I think it's
22 Women for America First who is doing the event on the 6th. It sounds like there is a
23 second group, but they're doing something else on the 6th, but they do not sound like the
24 headliner."
25 And then if we scroll down to the next page, Justin has sent a screenshot of the

1 tweet that we just went over from December 27th at 5:51 p.m.

2 We scroll down some more. There is discussion of the -- of a Georgia

3 January 4th rally, which we'll discuss here in a little bit.

4 If we go down some more, we're finally on -- if we go down to the bottom of this

5 page, [redacted]. I apologize, the next page. Go up to the top.

6 Justin writes, this is also on December 28th, "Let's decide what group we want to

7 put the permit in and have them do it for the Ellipse."

8 So I was showing that for context on discussions between people organizing this

9 January 6th event.

10 Were you aware, Mr. Peede, of a dispute that arose between dueling groups who

11 were fighting over the permit for January 6th at Freedom Plaza?

12 A Not at the time.

13 Q To your knowledge, did anyone at the White House get involved in resolving

14 the dispute between the dueling permit holders?

15 A Not to my knowledge.

16 Q If we take a look at exhibit 5. This is an email that you produced to us.

17 A Okay.

18 Q From Justin Caporale to you at your Gmail account. And he writes,

19 "Hey -- wanted to get your thoughts on the load list."

20 Could you help us understand why Mr. Caporale would be sending you an email

21 like this to get thoughts on a load list?

22 A Yeah. It's going to -- it will take a little explanation.

23 I was -- my background is in staging, audiovisual, lighting design, you know. So I

24 build things, I pick things up, I put them down, is the slang.

25 But I developed the concept and the equipment list for all Trump rallies, as

1 we -- as he started in the campaign, and also built all the rally load lists for the campaign
2 as they did. So the actual pieces of individual equipment, what type of speaker, how
3 many of the speakers.
4 Additionally, the Director of Advance at the White House is overall responsible for
5 all equipment that is at the President's event, whether it's political or official.
6 So this would have been something that would have generally come to me from
7 my advance team. My advance team knows what my specs are for an event. They
8 also know those specs because they're, you know, they're very talented.
9 And I -- Justin probably sent this to me just to make sure that I was -- I was good
10 with it. Obviously, it would have come from my lead at some point to me, yeah, to say,
11 are you okay with this type of equipment, this type of stage?
12 For example, the stage at the Ellipse had to have a structural engineer's report
13 because of the ballistic glass. I'm more familiar with the weight load limits for ballistic
14 glass, which can collapse a stage if not installed right.
15 So this was 100 percent inside of my role as the Director of Advance.

1

2 [11:01 a.m.]

3 BY [redacted]

4 Q So, knowing that, do you know why Justin would have sent that email to

5 your Gmail account instead of to your White House email address?

6 A No idea why he -- he's -- probably just what he -- the first -- the first email

7 that he put it into my Gmail. There's nothing there that wouldn't have made it my

8 way -- made its way to my White House email. Probably just a different source.

9 Q So, but a load list, he's referring to, for lack of a better term, sort of nuts and

10 bolts of staging and equipment?

11 A Of exactly what type of equipment was in there. Individual speakers,

12 individual sandbags, individual stage stacks, the most, you know, the mundane, boring

13 stuff you can possibly imagine.

14 Q Now you mentioned, I think, ballistic glass as an example. We know from

15 the footage of January 6th that the President when he spoke, spoke behind some kind of

16 shield, some kind of protective --

17 A Correct.

18 Q So were you involved in conversations about the need to have that kind of

19 infrastructure there for the President?

20 A I don't recall a specific question, but it would be expected in any venue

21 where the Secret Service, you know, could not control the horizon. It's not uncommon.

22 We had used it on the White House lawn previously. We had used it at different events

23 around the country, for example, the Christmas tree lighting, when we were on the

24 Ellipse. We would always use ballistic glass. Secret Service Technical Security Division,

25 or TSD, would make that determination of the need for ballistic glass.

1 Q So do you recall whether there were specific concerns raised about the
2 security at the Ellipse that would have required the use of that ballistic glass?
3 A To my knowledge, I'm not aware of any event specific threats there. To my
4 knowledge no President has spoken on the Ellipse without ballistic glass.
5 Q Now, one question I probably should have asked at the front end before we
6 started to get into the details of these conversations is, who would have been on your
7 advance team to coordinate the role that you had to play for the President on January
8 6th?
9 A I don't obviously have access to that information currently. Just in the back
10 of my head, I believe Jared Small may have been my advance lead. He would have been
11 one of my full-time leads, and they would have been doing that event.
12 Q Well, how big is the Office of Presidential Advance, in terms of the number
13 of people who are, at any given time, doing advance lead work?
14 A Advance lead work is broken up into a couple of different categories. In
15 general, Advance Offices going back decades have three of what we call staff leads, which
16 are the people that are more full-time, paid, White House employee staff leads. It
17 would vary between two and four, depending on what was going on.
18 We would also have the approximately same number, three, of what we call press
19 leads. They're the ones that deal with media logistics. The logistics only. This is not
20 part of the communications division or the press shop. They help to, you know, tell the
21 press where their satellites are, escort press around, make sure that they're all
22 credentialed properly, making sure the media logistics are handled.
23 Depending on the administration, there could also be a list of hundreds of
24 volunteer advance people that are, you know, individuals who are just out in the, you
25 know, out doing their normal jobs and take time off. They could be political appointees.

1 They could -- actually I'm not sure if House or Senate can take it. They -- maybe they
2 have to take time off, depending on the event.
3 But I would say up to 200 volunteer advance people around the country that do it
4 for free.
5 Q So for an event like the Ellipse, would it have been sufficient to assign a
6 single advance lead, or do you think that that would have required more people or
7 rallying volunteers?
8 A We would have always had some volunteers. The build-out of the Ellipse
9 for the advance team was out there. This was in a normal-size event compared to what
10 a, you know, a Trump rally in October would have looked like, except that we were on
11 home turf, we were in Washington, D.C. and not traveling. So same size or potentially a
12 little smaller than a normal event.
13 Q Do you know whether anyone from the Trump side -- I don't know if they
14 were campaign people involved -- were there Trump campaign individuals involved in the
15 Ellipse rally who were not -- maybe I -- I should stop because that's maybe not clear.
16 Were there -- do you recall having conversations with people who you had met on
17 the campaign, but not working with the White House Advance Office, still working on
18 behalf of the President -- and by -- I'm trying to distinguish people working on behalf of
19 the President from people who may have been working for Women for America First.
20 Maybe that's not clear, but.
21 A Yeah. I mean, I'm a little confused by exactly what you're asking. Are you
22 asking about the actual advance team, or something broader than that?
23 Q Yeah. I guess I'm asking in the context of advance team people, were there
24 people who were -- well, let me ask you this way: Were there still people working for
25 the Trump campaign in January of 2021?

1 A To my knowledge, there was no one working for the Trump campaign at all,
2 certainly not on the advance team, working for the Trump campaign. To my knowledge,
3 there was nobody on the payroll.
4 Q Okay.
5 A I don't have direct knowledge of that.
6 Q Was there any additional security hired by the White House beyond the
7 security provided by the Secret Service for the Ellipse event?
8 A Hired by the White House? Not to my knowledge. And I've actually never
9 heard of the White House hiring outside security. It's directly the United States Secret
10 Service.
11 Q In terms of the roles people were playing for January 6th, do you remember
12 what role Max Miller was playing from the White House?
13 A From -- on January 6th? I do not. To my knowledge, he was just doing his
14 normal role at the White House.
15 Q But do you know whether he had a particular responsibility in terms of
16 helping to put together the January 6th event for the President, like, whether he had a
17 special role for January 6th?
18 A No.
19 Q And what was -- what was his normal role?
20 A His normal role was coordinating, along with me, you know, the look and
21 feel of rallies to make sure that, yeah, they fit, they were Presidential in nature, and
22 something that the President would approve of.
23 Q Let's pull up exhibit 4 again, [redacted], and go to page 7. At 10:50 p.m.
24 Maybe scroll back up a little bit, so we can see the incoming text message. There's a
25 text message at 2:07 p.m. on December 29th from Ms. Wren to Justin. "Any updates

1 from White House on your end?" And his response is, "Schedule proposal would work
2 its way around tomorrow. Noon seems to be a good time. Then maybe a call to action
3 to march to Capitol and make noise."
4 Do you know where Mr. Caporale was getting information about the White House
5 status, the process of reviewing the schedule?
6 A No idea.
7 Q What is the normal process for that kind of schedule review?
8 A The schedule review, obviously the Office of Presidential Scheduling would
9 be pushing that -- that paperwork around. That would also be -- involve Political Affairs.
10 It would involve the Advance Office once there was actually a schedule. We would not
11 be involved prior to a schedule because it's a waste of our time.
12 And then, it would make its way through the communications department, the
13 legal, you know, the standard processes that are, you know, laid down through staff
14 secretary's office, who sort of is in charge of anything that gets to the President, any
15 paper that gets to the President.
16 Q In your role as the director of Presidential Advance, did you provide, sort of
17 generally speaking, your thoughts on whether it was appropriate or, you know, the
18 advisability of going to a certain event for the President?
19 A I -- only on the basis of a venue. So if I thought there was a venue that had
20 significant security questions, had not -- didn't have the infrastructure to successfully
21 complete our mission, which is to have a safe event and be able to get the President in
22 and out, I would intervene in that case but basically on event venue logistics only.
23 Our office has no -- no input on the other things. My -- my standard saying is, my
24 job is not to care what he says. It's to make sure the microphone works. And my
25 office, through me, and something I've tried to pride myself is, we stay in our lane. We

1 don't get involved in things outside of our lane.

2 Q So recognizing that, whose lane was it, in the first instance, to consider

3 whether the President should attend the event on January 6th, being put on by Women

4 for America First?

5 A You would -- that would be -- you would have to -- you know, that would be

6 a political discussion that would involve, you know, organizations outside of me -- or

7 offices outside of me. Yeah, political, leadership, communications.

8 Q It sounded like you were aware at some point, that this event for Women for

9 America First might have been originally proposed for Freedom Plaza. Do you

10 remember who first brought that to you? Because what I'm trying to understand is, it

11 sounds like you don't play any role in sort of the subjective decisionmaking about

12 whether it's a good idea for the President to attend, right? Your job is to make sure the

13 microphone works.

14 But at some point, somebody comes to you, I'm guessing, saying, we're going to

15 have a microphone for the President on January 6th. Do you remember who that

16 person is within the White House?

17 A No. It would have probably come -- and I probably would have gotten it

18 through the Deputy Chief of Staff's thing. That would have been how the paperwork

19 eventually made it to me or the thing. So, you know, the Deputy Chief of Staff for

20 operations.

21 Q Mr. Ornato?

22 A Correct. And that's the general process for events.

23 Q And you're saying that generally, because you don't specifically remember

24 for this event who that -- who came to tell you, we need a microphone?

25 A Yes. And then I would have taken it from there, you know, talking to the

1 hosts to say, your thing at Freedom Plaza, I think that's a terrible idea, I think it will be
2 impossible to secure.
3 And that would have been one of the cases when I mentioned earlier that I would
4 have pushed back and said that I do not feel comfortable, you know, building an event at
5 Freedom Plaza.
6 Q And when you say "impossible to secure," you mean in the context of
7 security for the President?
8 A Yes. That's my -- as crass as it sounds, my job is to get the President there
9 and getting -- you know, have a successful event and get him out. First priority.
10 Obviously, there's the priority of the crowd getting in safely, having the assets they need
11 to hear the event, first aid facilities, Porta Potties, things of that nature, food or water,
12 and then to get them out in -- in a smoothest way possible.
13 But I would have, you know, personally vetoed that -- that event at Freedom
14 Plaza.
15 Q Safe to say, though, that for an event that's being put on by a third party that
16 ultimately a lot of those logistical considerations like Porta Potties, medic tents, those
17 kinds of things, are really their responsibility, right?
18 A They are their responsibility for a nonofficial event. However, we would
19 have required, for his participation, certain needs to be met.
20 Q What do you mean by that?
21 A For example, we would have required bicycle rack for barricades, for security
22 fencing. We would require power for the Secret Service metal detectors. We would
23 have required, you know, via the Secret Service requests, for medical assets. You know,
24 EMS assets for people, you know, people stand in line for hours among hours for things.
25 So there's certain requirements that if not met, it doesn't really -- it jeopardizes

1 the ability for us to have a successful event, and the Advance Office would push back
2 through our, you know, chain of command to -- to highlight those -- those issues.
3 Q So let's take a -- well, actually before I move on to the next exhibit, this text
4 here from Mr. Caporale to Ms. Wren, on December 29th, says, "Maybe a call to action to
5 march to the Capitol."
6 And ultimately we do know that the President did, in his speech, encourage
7 attendees to go to the Capitol following the Ellipse event. Do you recall when you first
8 learned that the President or that organizers were intending to encourage people to go to
9 the Capitol following the Ellipse event?
10 A I don't -- do not recall, but I believe it was certainly after the event via -- via,
11 you know, media.
12 Q So you don't have any advance information about the President's hope to
13 send people down to the Capitol?
14 A No, not to my recollection, and I don't remember seeing a pre-copy of the
15 speech. I generally don't receive copies of the speech because it's not in my -- my
16 purview.
17 Q And one last clarification. We've been speaking in terms of -- or you've
18 been speaking in terms of generalities, what would have happened, based on your
19 experience -- your long experience in Presidential Advance.
20 But with respect to this particular event, an event that, you know, is being put on
21 by a permit holder on National Park Service property, you know, building put by all of
22 these other folks off site, not being put on programs by the White House, is it fair to say
23 this is a nonofficial event in terms of, you know, the President's participation?
24 Mr. Greim. Objection, vague. And also asked and answered.
25 BY [redacted]

1 Q Well, how would you characterize it in terms of an official versus -- maybe
2 I'm not using the right word then. In your experience in Presidential Advance,
3 Mr. Peede, is there such thing as an official White House event versus a nonofficial White
4 House event?
5 A There are -- there is -- there are official events, and then there -- let's call
6 them other events.
7 Q And what was the Ellipse event?
8 A That -- I believe I discussed earlier, that would be something that the Office
9 of Political Affairs would have to confirm. I don't recall. Certainly I don't believe it
10 would be a political event.
11 Q Okay.
12 A It would have to fall in the category of other, I guess.
13 Q I want to just show you for context some more of the President's tweets
14 from exhibit 2, and if we go to page 9, December 30th, January 6th, "see you in D.C."
15 We scroll up to January 1st. "Big protest rally in Washington, D.C. Will take
16 place at 11 a.m. on January 6th. Locational details to follow. Stop the steal."
17 It looks like that may have been tweeted a second time after being deleted.
18 Page 7, on January 1st, the President again tweeted "January 6th, see you in D.C."
19 It included a link.
20 Page 6, on January 3rd, he retweets Amy Kremer, who is one of the leaders of
21 Women for America First about the January 6th event being held at the Ellipse.
22 I think if we scroll up a little farther on January 3rd, the President confirms that he
23 would be there as well.
24 Maybe it's below this one, [redacted]
25 On January 3rd, he writes, "I will be there. Historic day."

1 And this is a retweet of one of the event organizers.

2 And then, finally, on January 5th, the second page of exhibit 2, he writes, "I will be

3 speaking at the Save America Rally tomorrow on the Ellipse at 11 a.m. eastern. Arrive

4 early. Doors open at 7 a.m. eastern, big crowds." And then also includes a link.

5 Do you recall at what point it became decided, yes, the President will attend this

6 event?

7 A No. But I mean, just from what you're, you know, the dates that

8 you're -- that you're showing me, you know. But I don't -- I don't recall an absolute date.

9 Q So it's been publicly reported that during this time period, the President

10 originally was in Florida at Mar-a-Lago, I think --

11 A Yes.

12 Q -- for Christmas, and then had originally, based on schedule information that

13 had been given to the press, planned to be at Mar-a-Lago until after the New Year and

14 was going to host a New Year's Eve party at Mar-a-Lago. That was in -- that was in the

15 news.

16 But there was a change to return to Washington, D.C. on about December 31st,

17 New Year's Eve. Were you in Washington throughout this time period? Do you

18 remember where you were during this time period between Christmas and this event on

19 January 6th?

20 A I traveled with the President. I was at Mar-a-Lago the entire time he was

21 there.

22 Q So what prompted the President to come back to Washington, D.C. earlier

23 than originally planned?

24 Mr. Brothers. Objection, speculation.

25 BY [redacted]:

1 Q Do you know what prompted the President to come back earlier than
2 planned?
3 A No.
4 Q Didn't ask anybody, Why are we going back to D.C., you know, 4 days ahead
5 of schedule?
6 A It's a very common occurrence. It didn't -- it didn't raise anything. We
7 change our schedules on the fly routinely.
8 Q So since you were in Florida during this time period just ahead of New Year's
9 Eve, does that -- you know, knowing that that's where you were, does that help you recall
10 any conversations you had about the Ellipse rally and when things really start to maybe
11 become confirmed that the President's going to participate?
12 A No, it doesn't. I was fully involved in the activities that he had in Florida.
13 Q Also during this time period, were you involved in planning his participation
14 at a rally in Georgia?
15 A I would -- the advance team would have been on the ground, would have
16 been one of my advance teams. I would have had peripheral knowledge of activities,
17 but that would have been through whatever entity was doing the -- I think you referred to
18 the Dalton, Georgia rally.
19 I don't recall if there was more than one, but peripheral knowledge because it
20 does fall under the purview of the Office of Presidential Events.
21 Q Are there any events during this time period for which you took on for
22 yourself the effective role of the being the advance lead that was kind of the point guard
23 to run the President's participation in an event?
24 A Not while during the time period that we're talking about, not when I was
25 back at the White House that I can remember. Some events I would travel to when the

President went. That could have been as many as a couple to, you know, many more.

Q Okay.

A But I don't have direct recollection. That would be in my, obviously my work emails, subject to the PRA.

Q Let me pause there and see if anybody else has any questions about this sort of -- this series of questions I've just asked.

[redacted] Yeah, [redacted] It's [redacted] Can I just ask a couple things?

[redacted] Sure.

BY [redacted]:

Q Mr. Peede, I appreciate your testimony that you were unaware of any plan for the President to march to the Capitol, walk to the Capitol. The text exchange that [redacted] showed you, you didn't see. Is that accurate, you had no idea in advance of the event about specific plans to move the President from the Ellipse toward the Capitol?

A I have no -- no knowledge of any plans to do that. I had made a blanket statement that -- that we would never go -- be able to do anything like that. This was just the thing, we would never go to the Capitol. It's impossible to secure.

Q Yeah. I mean, you're anticipating my question right. In your judgment, if he had spontaneously said, let's go to the Capitol, not something that had been planned, how feasible would that have been, in your view, as his director of advance?

A I -- from a staff perspective, obviously we can only give advice. However, the strong opinion of -- of events like that, moving to the Capitol or other events where, you know, the safety and national security aspects would be compromised, we would refuse to do that. That is, when I say "we," that is myself and the United States Secret Service.

Q Okay. And would Secret Service have the ability to essentially veto those

1 ideas, or, ultimately, is it up to the President himself? He, as the Commander in Chief,
2 can just decide, I know it's dangerous, but I'm going anyway?
3 A That would be -- that's a real question, I guess for the lawyers at the Secret
4 Service.
5 Q Yeah.
6 A I've been in several scenarios where for other Presidents -- I'll leave it at
7 that -- where we have told them that they're not able to do something, and that's been
8 understood.
9 Q Uh-huh. Were there times during your -- your time at the White House,
10 beyond this day, where the President, President Trump, would decide spontaneously to
11 do things that were -- to move specifically to places or directions that were unscheduled?
12 I want to go walk here or go there or do that? Did that happen on occasion during your
13 time working for him?
14 A It -- without recalling specific instances, there's actually a name for it, OTR,
15 off the record. So anytime the President, Vice President, any protectee, shall we call it,
16 it's an unannounced movement of the President for a multitude of reasons. Sometimes
17 our OTRs is because, you know, a President, I mean, you know -- and this goes to all
18 Presidents -- you know, they may want to stop for a pizza. They may want to stop and
19 look at a flag display on the side of the road. Those are inherently difficult to do
20 without, you know, our knowledge and the Secret Service knowledge just for national
21 security issues, because we don't know what we're walking into. But it's -- it's not
22 uncommon at all.
23 Technically, for example, all golf outings, for example -- I'm sure this is the same
24 way with President Clinton, President Biden, certainly for President Trump -- all golf
25 outings are OTRs. They're unscheduled movements, even though everybody in the

1 world knows we're going to go do that. Those are -- those are OTR movements, so
2 they're fairly common.
3 Q I appreciate that. So -- so is it, I'm just trying to get a sense of how normal
4 an OTR is, right, in your -- again, your experience with President Trump, would he
5 routinely go OTR or spontaneously decide to get a pizza or play golf or walk somewhere?
6 Or was that an unusual event?
7 And I know that's a subjective question. I'm just trying to get your sense as to
8 how often or how regular that happened?
9 A Well, I mean, our public schedule shows golf outings, so the golf outings,
10 OTRs, were extremely common. Other OTRs I would say, were extraordinarily rare.
11 Q Okay. Would he generally, in your experience, defer to Secret Service or
12 the Deputy Chief of Staff, Mr. Ornato, or others, when it came to things that were, the
13 advice was it was too dangerous?
14 A Yes. He would -- I don't -- I'm not aware of any situation where he
15 overruled a Secret Service decision.
16 Q Got it.
17 A He never overruled one where I was -- where I would say that, Sir, we can't
18 do this.
19 Q Yeah. Okay. That's all I have, [redacted]. Thank you.
20 [redacted] Thank you, [redacted]
21 Anybody else have follow-up?
22 BY [redacted]
23 Q Yeah. Mr. Peede, I'm [redacted]. I'm here with [redacted], and I just
24 have a few follow-up questions regarding your time in Florida.
25 A Sure.

1 Q Did you leave on December 31st as well, the same day that President Trump
2 did, to return to Washington?
3 A I -- I'm almost sure I did. That would obviously show up on the manifest of
4 Air Force One. I -- yeah, I can't recall. I mean, I hate to say that I -- you know, we're on
5 Air Force One a lot, but I'm pretty sure I went back at that time.
6 Q And did your Office of Advance have involvement with the plans for the
7 President's New Year's Eve party at Mar-a-Lago?
8 A We would have had -- we would have had knowledge of it. You know, I've
9 been there for that party numerous times. Our advance team who was working Florida,
10 would have been doing -- preparing any movements that he did in Florida, whether it's
11 just going to dinner, going to golf, having meetings or attending any kind of reception or
12 party.
13 Q Sure. And had it been your plan to attend the party if you had stayed in
14 Florida?
15 A I -- well, I don't really attend. I would, you know, I would not have been in
16 a tux. I would have been there in my working environment, which was making sure the
17 President got in and got out, along with the Secret Service.
18 Q And in your time with the administration during several years, did the
19 President ever fail to attend his own New Year's Eve party, or was this the first time?
20 A I don't recall that. I know that I was either at a New Year's Eve party prior,
21 or maybe it was a Christmas party.
22 Q So given that he did not attend his own New Year's Eve party in 2020, it
23 didn't prompt a question from you about why he was leaving to return to D.C. when
24 guests were there to be with him that night?
25 A No.

1 Q Nobody told you -- nobody told you anything about why you had to pick up
2 and go?
3 A I don't recall anyone telling me, but as I testified earlier, we change our plans
4 on the fly fairly routinely.
5 [redacted] Thank you.
6 Mr. Peede. Thank you.
7 BY [redacted]
8 Q All right. Just to give a sense of where we are. I have one last little bucket
9 of questions from logistical prep, and then it might be a good place just for us to take a
10 break briefly if that's okay with everybody.
11 A Okay.
12 Q I'd like to pull up exhibit 6.
13 [redacted] One second, [redacted] Adobe is moving slowly.
14 BY [redacted]
15 Q Exhibit 6 is one of the emails you produced to us, Mr. Peede. It is an email
16 from Justin Caporale to you and to Max Miller, both at your, it appears, your [redacted]
17 [redacted] And in it Mr. Caporale says that he's listed below, list of rules and
18 regulations for the Ellipse. And the date, I should say, of the email, is December 29th at
19 7:10 p.m.
20 And it says, "Some of them are expected. My largest concerns right now is that
21 NPS will not allow us to build out in the vista sight line, which runs directly down the
22 center of the Ellipse." And then he goes on to talk about some other production issues.
23 Do you recall issues being -- I mean, do you recall receiving this email, receiving
24 concerns about the vista sight line for the January 6th event?
25 A I don't recall this email specifically. I do, however, recall being informed of

1 issues on the vista sight line.

2 Q Did you have conversations within the White House about the vista sight line

3 issue?

4 A I'm sure I would have. It was -- for me it was -- that would be a significant

5 logistical issue.

6 Q So do you remember how the sight line issue was resolved?

7 A My understanding is that the -- there was -- the construction of the -- the

8 new -- the gate or the wall around the White House, or fence -- I should use that

9 word -- fence around the White House presented some sight line blockage, along with the

10 White House Christmas tree was still up and -- not sure why, and that presented some

11 problems along with steam tunnel issues, which are notorious issues at the White

12 House -- at the -- well, they're at the White House too, but the Ellipse, and that given all

13 those issues, the National Park Service was able to make a -- give -- give the host a waiver

14 to move it to the center, not to jeopardize the steam tunnels, but also to, you know, allow

15 a visual of the White House.

16 Q Let's pull up exhibit 7, [redacted] And Mr. Peede, this is a PDF that's sort of a

17 compilation of communications from event organizers and -- with the National Park

18 Service. And I will say that, you know, we did provide access to documents here

19 yesterday to your attorneys. It's my understanding and assumption that you did have a

20 chance to review --

21 A Yes.

22 Q -- these communications. So I'm not going to read them word for word.

23 They are exhibits that will be a part of the record. But generally speaking, the first page

24 of this is a December 31st email from Amy Dailey to Justin Caporale. Amy Dailey is a

25 park ranger at President's Park, which encompasses the Ellipse, part of National Park

1 Service property.

2 She advises that he submitted a request to her superintendent for consideration.
3 If we scroll down, we can see what that request is. Here, you know, Justin had earlier
4 asked Ms. Dailey, or Ranger Dailey, number one of his two points was that they would like
5 to have the same sort of positioning as they saw for the 2019 National Menorah Lighting.

6 And this is in the context of being able to build within this sight line vista between
7 the White House and the Jefferson Memorial.

8 If we scroll down to the next page, I think we have the response. This is from the
9 National Park Service, again, Amy Dailey, and it's back to Justin with lots of National Park
10 Service personnel copied on it.

11 And number three in her email says, "I've spoken to my superintendent as well as
12 the acting area director about the request for the placement of the stage within the vista
13 sight line." And then she copies and pastes the -- as well as his request to reposition or
14 remove the chain link fence around the Christmas tree.

15 And the response back was, you know, we'll give you the same position that was
16 offered to the rabbi. But this was still not going to allow sort of a direct, dead center
17 stage positioning on the Ellipse. That's it. The time stamp on that email is at 3:17 p.m.
18 on December 31st.

19 If we go down further, we can see that very shortly after that, according to these
20 emails -- we can keep going -- here at 3:20 -- this is central standard time, but 3:20
21 eastern time, the specific response from the superintendent that Ranger Dailey had
22 provided to Justin, is forwarded to Max Miller, with this, you know, "Here's where we can
23 let you put the stage. It's not going to be in the center, but here's where we can put it
24 for you." Also saying that there's not sufficient time or resources to reposition the fence
25 that he had raised the issue for. That's December 31st, so New Year's Eve.

1 And essentially, Park Service just said, we're not going to let you go in the center,
2 but this is what we'll let you do.
3 Next page of this series of communications. You can see at the very top of this
4 page, of exhibit 7, that Justin has forwarded this email we're looking at to Max Miller.
5 [redacted], if you just scroll up a little bit, you can see this is January 1st at 7:12 central,
6 so 8:12 central, he has forwarded to Max Miller the below email, which was sent just a
7 few minutes earlier, directly to John Stanwich, who is the superintendent of President's
8 Park.
9 And without reading this email, it's essentially Mr. Caporale's detailed request to
10 ask for an exception to this vista sight line policy to allow them to set up in the center of
11 the Ellipse. That's at January 1st, New Year's, Day at just after 8:00 p.m.
12 And if we go down further, we see Superintendent Stanwich's response just
13 before 10:00 p.m., where he gives his own response back, explaining the basis for not
14 allowing the placement of structures within this vista. But then the second paragraph
15 says, however, you've given some compelling reasons, and why we'll essentially allow you
16 to build into the center of the Ellipse.
17 So with all of that having been summarized and recognizing you're not copied on
18 any of these emails, but they're coming to Max Miller, with whom I think you had a
19 regular working relationship, what can you tell us about the process through which the
20 event organizers are told no, essentially by the Park Service, you can't build in the center
21 of Ellipse, to, about a day later, being granted an exception to be able to be in the center
22 of Ellipse? Do you have any personal knowledge about that evolution of events?
23 A This particular evolution of events, I -- I do not. I can tell you that as a
24 normal course of business, if we were dealing with land that was in a governmental
25 entity, you know, say the Lincoln Memorial, for example, Mt. Rushmore, for example, we

1 would be dealing closely with the -- you know, the controlling entity, in this case, the
2 Department of Interior.
3 I can give a more recent explanation of how this would happen. I -- I was
4 recently in charge of doing the production at the World War I Memorial for Senator
5 Dole's funeral. The National Park Service obviously controls that site. The host
6 organization, which I believe would have been the Elizabeth Dole Foundation, was denied
7 the ability to do any build-out there, so no sound for press relationships, things of that
8 nature, even though, you know, the Secretary of Defense and other people would be
9 there.
10 The host organization reached out to their contact at the White House, who
11 promptly reached out to their contact at the Department of Interior, and a few minutes
12 later, everything they had requested was granted.
13 So it's the normal course of business for an Advance Office, or a host organization,
14 dealing with, you know, a governmental organization to try to, you know, to work on, you
15 know, improving their event, or at least their ideas for an event.
16 So it's not something that's uncommon. I think all administrations do that, you
17 know, through their political affairs shop or whatever it may be. I know, you know, in
18 this case, it's a very close example with the Dole funeral that, you know, the Department
19 of Interior, sort of the same entities, White House is involved and -- on government
20 property and quickly they -- National Park Service was able to change their rulings. And
21 that was almost a month ago.
22 Q So I think you know -- at least we can show you on exhibit 8. This is a text
23 message between Justin Caporale and you, from his side, where he writes to you on
24 January 1st, "you know, we have official approval to build in the vista sight line."
25 A Right.

1 Q So were you aware that Max Miller had reached out to the Deputy Secretary
2 of the Interior Department about this issue?
3 A I -- it's -- I know the Deputy Secretary. I believe you're talking about, I
4 believe it's Kate MacGregor. Is that right? I think MacGregor is the last name. I
5 wasn't aware at the time, I believe, that he was talking to her, or that he was talking to
6 anybody at Interior.
7 But it would not be uncommon in our role to, once again, for the event logistics
8 and to offer, you know, the best visuals for the people attending and the people watching
9 via media, as part of my job is that visual branding. So that would not have been
10 uncommon on our part.
11 Q And I don't want to be indelicate, but I'm just trying to get a sense from your
12 perspective about the dynamic of that conversation, where someone from the White
13 House reaches out to another executive agency to say, Hey, we've got some people who
14 have run into issues, can you fix this for them?
15 Is that a -- can you sort of describe for us what that kind of conversation is going
16 to be like normally? Is it giving an order, or is it trying to understand what they can do
17 to get to yes?
18 A We -- well, my knowledge, we can't -- I can't order anyone to do anything.
19 No one at the White House can order an executive agency to do anything. I guess
20 the -- you know, the President can do that to the Secretary. I don't have that -- that
21 ability.
22 My ability is to highlight issues that may -- may impact an event. For example,
23 sometimes government agencies are the funding entity for an event. If it's an official
24 event and we're dedicating a new national park, the Department of Interior would be the
25 funding agency. Obviously, we would work very closely with them to make sure that

1 they had the proper funding to do the event with the Secretary of Interior, the President,
2 or the Vice President, or whoever it may be.
3 But we -- our outreach to executive level agencies is very common and occurs
4 continuously.
5 Q So just to make sure I'm clear on this, it sounds like you're saying it's not
6 uncommon for -- if there's a sort of frontline snag is how I'll put it, with the sort of
7 on-the-ground permitting authority, to then have a conversation with higher-ups within
8 the executive agency to understand if there's a way around it?
9 A I wouldn't characterize it as a way around it. I would characterize that I will
10 highlight issues from a logistics perspective routinely, to both my chain of command and
11 to whoever the host organization may be, whether it be a third party or an executive level
12 or any other agency. It could be a -- it could be a governor's office if we're in a State and
13 we're doing an event with the governor. I have no issues calling the governor's office
14 and saying, we have an issue with this. This helps us do a Presidential-level event.
15 Q So that's helpful context then. Is it good for us then to understand -- or not
16 good -- is it accurate for us to understand then, exhibit 6, which was the email Justin sent
17 to you and Max Miller with his list of concerns, as being exactly that kind of
18 communication, here are my concerns, with the, you know, the idea that hopefully
19 there's a way to resolve these concerns?
20 A I -- I believe this email would have been notifying me that there are concerns
21 of a logistical nature for an event the President's attending, which would have absolutely
22 been in my wheelhouse.
23 Q Right. Is there any follow-up on those logistical questions from anyone?
24 Okay. I think we've been going for a little more than an hour and a half. I think
25 from my sort of plotting out of this, that we likely could be done by 1:00 if we take maybe

a short break now, but I want to be respective of everyone's time and needs.

Would it be okay for us to take maybe a, you know, 10-minute break or so -- or maybe call it 13 minutes and be back at noon?

Mr. Brothers. That's fine with us.

Mr. Greim. Ask the witness, too. Mr. Peede, are you doing okay? Do you need a little more time or is that okay?

Mr. Peede. I'm fine. That works for me.

Mr. Greim. Okay.

[redacted]. Okay. Let's go off the record. We'll come back and start again at noon.

Mr. Greim. Okay.

[Recess.]

1

2 [12:00 p.m.]

3 [redacted] All right. Let's go back on the record. It's 12 p.m. We're back on

4 the record for the deposition of Robert Peede.

5 BY [redacted]

6 Q Mr. Peede, I want to ask you some questions now about the immediate days

7 before January 6th and the planning that may have been going on at the White House.

8 First, let's pull up exhibit 11, and if you go down to the very bottom of this exhibit,

9 page 4, this is an email thread that sort of reads from the end back to the beginning -- or

10 sorry -- the other way around -- from the beginning back to the end, from the last page to

11 the first. Originating with Hannah Salem, who, it's our understanding, was helping to do

12 press advance for the host of the rally. Does that sound right to you?

13 A I don't believe she -- it's a semantic title difference. I don't think she would

14 have been doing press. She would not have been a press advance person. That would

15 have been a White House role. However, my understanding is that she was doing

16 something for the -- for the host. I don't remember her being my press advance person.

17 But she certainly provided the role. She was formerly the director of press advance at

18 the White House when I was there, and before that, was a full-time press lead in my

19 office.

20 Q Thanks for that clarification. This email that starts the thread on January

21 1st, 2021, is sent from Ms. Salem at a private company email domain. Is that fair to say?

22 A It appears to be Salem Strategies, LLC. I believe that is her communications

23 company.

24 Q And the subject line of this email is media registration link -- a March for

25 Trump media registration link, and the email appears to be sent to Judd Deere, to you,

1 Michael Mahfouz. Who is Mr. Deere?

2 A He is -- I don't know his exact title, but I would call him deputy press

3 secretary most likely. He is the person that we would normally, you know, vet

4 coordination between the White House and the event logistics or evolving view, White

5 House Correspondents' Association, which you see lower, the WHCA board. It can be

6 confusing. That is actually referring to the White House Correspondents' Association.

7 That's the organization of the media companies, where WHCA also stands for White

8 House Communications Agency, which is a DOD entity that is involved with technical

9 logistics, revolving national security, and other issues, and the communications around

10 the President -- communications of an infrastructure need, not communications as in

11 messaging.

12 Q So, but Mr. Deere does not work in the Advance Office with you?

13 A Negative. He is -- he works through, I guess it would either be

14 communications or the press -- the press office.

15 Q And who is Mr. Mahfouz?

16 A Mr. Mahfouz is, if you look at his email, it says the word "associate."

17 Associate is a designation that we put on all emails which mean he is a volunteer for the

18 Advance Office. The associate tag is put on there so it can tell everybody that the

19 person is not a full-time White House employee.

20 Mr. Mahfouz was a White House employee working in another office, and then

21 helping out in Advance Office. My guess is, he was probably one of the press advance

22 people on this event. That's why he would have been included.

23 Q When you say someone is not a White House employee or they're a

24 volunteer, are they otherwise employed by the Federal Government?

25 A They could be. Mr. Mahfouz used to work, I believe, in the travel office, I

1 believe, so making travel reservations. If they're not a full-time White House person, as
2 I was explaining earlier, we have those three leads, three press leads, and several
3 hundred volunteers.
4 All the volunteers are run through basically the White House Intern Office. It's a
5 volunteer program. Same people who build -- you know, put up the Christmas
6 decorations and help out, with, you know, the Easter egg roll and things like that, they're
7 all sort of through the same poll. They're vetted separately.
8 They're given an associate email so that we are able to track what emails they can
9 send. For example, they don't generally send emails outside the White House domain if
10 they're using their associate email.
11 Q So in this email from Ms. Salem, she's including a media registration link for
12 this event that the subject line refers to as March for Trump. If we read this backwards,
13 the response from Mr. Deere is to ask, do we know what we're calling this event. And in
14 response, Ms. Salem writes, "good question. We're calling it the Save America Rally, but
15 the link to register is March for Trump. I defer to Bobby but for schedule purposes, I'd
16 put Save America Rally."
17 Do you know what she's referring to in terms of saying --
18 A Can we get to the part where it says defer to Bobby. I just want to make
19 sure I understand what you're saying.
20 "Calling it the Save America Rally but the link to register is March -- I defer to
21 Bobby, but for schedule purposes, I'd put Save America Rally."
22 It would just be the logistics. Our office, through the Press Advance Office, as I
23 think I've stated earlier, we did not have a director of press advance at that time. So
24 when I came back in, we were making changes and -- and Hannah, was the former
25 director, had left. So I feel sure she was just CC'ing me on that. But it's something that

1 our -- under my office's things, we would be sending out the media logistics.

2 As I said earlier, we handle the media logistics, not the messaging, not going on

3 the record, but telling them where you can park your satellite truck, what time you have

4 to have your equipment in for Secret Service sweeps, accepting or denying members of

5 the press, depending on how many members would be there, you know, whether there

6 are too many. So we sort of go through the logistical part.

7 So she's putting me on notice that there's -- you know, that this registration link is

8 going out. I would never have any input on what the name of an event is. It just

9 doesn't matter to me.

10 Q Thank you for that. I just want to note for the record that Ms. Lofgren has

11 joined us again.

12 So if we scroll up to the second page of exhibit 11, and maybe a little bit higher

13 onto the very bottom of page 1, you can see that there's an email now, there's a couple

14 of additional people who have been added to this chain, including Gaby Hurt, whose

15 email address reflects Maria G. Hurt. Do you know who Ms. Hurt is?

16 A Yes, I do.

17 Q Who is she?

18 A She is what we refer -- and I'll make an assumption that she had the same

19 title as when I -- when I was working with her more -- more often. She is what we call a

20 press wrangler. So she works for Judd Deere through the, I'll call it the press shop, the

21 Office of the Press Secretary, I believe is the actual office, not the communications office.

22 She is what we call a press wrangler. So the -- the best way to describe it is the

23 White House press pool, so the pool -- the reporters, they're limited, 12, 13, 14 reporters,

24 who travel everywhere the President goes. We call it a protective pool. So they're

25 always with the President, based on a lot of things that happen, you know -- I believe it

1 started back after President Kennedy's assassination, where the press always needed to
2 be there when the President was outside the White House.
3 The wrangler is the person responsible for wrangling these members of the press,
4 making sure they get into the vans to go in the motorcade. For example, in this case,
5 Gaby, if she was the person assigned that day, would have taken the press out of the
6 press briefing room. They would have taken them to a press van, that the, you know,
7 the White House provides. They would've -- she would've gotten in the van with them,
8 taken them to the event, escorted them into the buffer, which is the protected area
9 directly in front of the stage, allowed them to get their questions asked or still
10 photography or video. And then eventually escort them back to the motorcade and
11 then back to the press. So she's literally in charge of wrangling the press that travels
12 with the President. So this would have been in her wheelhouse, absolutely.
13 Q And the other person who's added is someone, Daniel Tiso. Is he also in
14 the press shop?
15 A Daniel Tiso is a full-time White House press advance person. So he was one
16 of my full-time press advance people.
17 Q And if I'm looking at this, the body of the email here that's sent by Ms. Hurt
18 on January 4th, it looks like she's sending a draft notice to press for guidance about the
19 President's remarks at the March to Save America Rally on January 6th. You can see
20 here it's -- you know, there is a sort of where and when and links, if we scroll down a little
21 further, links to request press credentials.
22 I'm only showing you this just to sort of set the context for, if we go to the very,
23 very top of exhibit 11 on page 1 -- again, we sort of have to go to the end to get to the
24 beginning -- the last email in this chain is from Mr. Deere back to the whole group again,
25 talked with Hannah. We're going to hold on this. Sorry for the work team.

1 So do you know, in your experience, is there a particular reason why press
2 guidance would or wouldn't be given by the White House for events where the President
3 was going to speak?
4 In other words, is this something that the White House would say, We're not going
5 to send out guidance because this is not the kind of event that we would set guidance
6 for?
7 A We would never do that. We would never get to this if we hadn't already
8 confirmed the event. I don't know why the -- why this says we're going to hold on it. It
9 could be that timing was going to change. It could be -- there could be a multitude. It
10 could be, you know, any issues. I don't recall why -- why this would have -- obviously I'm
11 on this email. Probably never even, you know, reached my consciousness.
12 But something we would not say, we would not have gotten to this point if it was
13 not a Presidential-level event.

1

2 [12:12 p.m.]

3 BY [redacted]

4 Q Okay. Let's take a look at exhibit 9.

5 Exhibit 9 is a text thread that is between you and Justin Caporale. And I believe

6 Max Miller is the participant in red. And I can see that there is a third J on the top,

7 which I think may be Jared Small, but he doesn't participate in this.

8 But what we can see here from this text thread, on January 1st Justin Caporale is

9 sending a screenshot of one of the President's retweets about January 6th, and he adds

10 his own words below that image.

11 [redacted] you can keep scrolling.

12 "Boss tweeted the registration link. We held all location info." And then, again,

13 another tweet from the President advertising this.

14 And the response in blue from Max Miller is, "Great, he changed the time again."

15 And then we see below that Bobby Peede writes, "Sweeps and mags are going to

16 be early."

17 And Max Miller responds, "Oh, yeah."

18 Justin is now talking about the number of people that might attend, making a joke,

19 you know, "Don't let the boss tweet a number."

20 And Max Miller responds, "They already promised him 100,000 people."

21 We go down to the next page. You write back, "Is it 20 or 100?" And, you

22 know, it looks like there is a conversation back and forth about how many people need to

23 be preparing.

24 I want to show you this to sort of set the stage for my question, which was, did

25 you have any conversations with the President about what his expectations were, from

1 an Advance perspective, for the January 6th events at the Ellipse?

2 A I briefed him on, obviously, an area I'm sure we'll get to on January 4th

3 about the logistics of that. I had no previous conversations about what his expectations

4 were. It was built like a standard -- our standard rally we had done a thousand times.

5 So I knew that we -- you know, the pitfalls and benefits and, yeah, negative issues

6 involved with things he would like or not like.

7 Q So what were the logistical issues that you briefed the President about on

8 January 4th?

9 A The logistical -- well, I would say, it's not logistical issues, but the logistical

10 layout. How the stage would be there. The ballistic glass, which he's not -- and,

11 frankly, no President I've ever worked for are fans of. It tends to muffle the crowd

12 energy. It tends to get dirty. So the cameras always look bad.

13 And he's not -- we don't routinely use a mobile stage, a stage with a roof on it.

14 He's used to a much smaller stage. So I briefed him on that. I briefed on him on where

15 the stage would be, that he would be traveling via motorcade, and that all the other

16 things, the amount of people that the permit was done for. Basically, the same logistics

17 that I briefed him for every single event that he's done in the last 5 years.

18 Q What were your expectations for the crowd size ahead of the January 6th

19 event?

20 A The one area Presidential Advance prides itself in is that we never do

21 crowd-raising. It's the worst possible job in any event.

22 My expectations were that it would be anywhere from 10,000 to 30,000 people.

23 Q And how did the sort of reality align with your expectations in terms of the

24 crowd size?

25 A Well, I was only looking at the crowd size for the event inside the Secret

1 Service perimeter on the Ellipse. That crowd size was smaller than the 30,000 number
2 because of the way we built it and for some logistical decisions we made along with the
3 Secret Service as far as how many metal detectors we were going to use.
4 So it was in line with the lower expectations of crowd size inside the Ellipse, which
5 was, frankly, the only thing I cared about.
6 Q Now, you mentioned metal detectors. When you are directing advance for
7 the President, are you being given information by Secret Service about the kinds of things
8 that they're pulling from people at metal detectors?
9 A There is a standard list of items that the Secret Service prohibits. They can
10 obviously adapt that list at any time. I tend to get updated on how many -- what the
11 flow rate is, which is an argument that has been going on, well, probably before I was
12 born. The Secret Service thinks they can process more people more quickly than we
13 think they can, and that's not uncommon for every administration.
14 The prohibited items list is the exact same. I do get crowd counts as far as how
15 many people are processing through a metal detector. They'll say an hour and 7,000
16 people, whatever the number may be.
17 Q So are you also ever getting advised, "We have pulled, we found, you know,
18 people have been trying to bring baseball bats in," or, "We found somebody with a gun"?
19 Are you ever getting updates like that for Presidential events?
20 A It may happen in just a side conversation. A lot of times I tend to go up
21 once I arrive, because I don't sit there and listen to the President's speech. I tend to go
22 to the metal detectors to make sure the crowd's getting in, and being a familiar face to
23 the Uniformed Division of the Secret Service who provides the metal detectors for the
24 Presidential Protection Division that oversees that part.
25 In a chitchat they may say, "We have found" -- sorry, I just had a pop-up on my

1 computer. Yeah, the logistics, he may say, "Hey, we had a handgun." It's not
2 uncommon at an event where, especially in States that have concealed carry permits,
3 that people would carry a gun -- attempt to carry a gun -- because they believe they have
4 a valid permit under State law.
5 The Secret Service's Federal security designation doesn't allow handguns to come
6 through metal detectors, and that's even for active law enforcement officers that aren't
7 part of that -- yeah, part of the security detail.
8 So I get briefing on that just in random conversations.
9 Q So is there ever a time when that information helps to inform -- that you
10 feel -- is there ever a time that when you get that information, you then take that and
11 bring it back to people close to the President to help inform how he should participate in
12 the event, or additional security precautions, that kind of thing?
13 A There would be times that if it -- if there was an issue with security -- for
14 example, a drone overflight -- that we would start discussing the potential of moving the
15 President [inaudible]. There is what we call an Emergency Action or EA team that is
16 prepared always to move the President to a predesignated area [inaudible]. I am
17 actually with the President. I am not part of that EA team. That's for different things.
18 That's a national security movement.
19 But there are times where we'll discuss -- we could be -- a traffic jam. "Hey, the
20 motorcade, we're going to have to wait because the motorcade route is now full of
21 parked cars, and we have to sweep the cars for bombs before the motorcade drives by."
22 Things of nature. Logistical issues.
23 Q And I'm just trying to get a sense of whether, you know, if you're near the
24 mags, and the Uniformed Division or whoever it is that's doing the magnetometers is
25 starting to say, "Hey, we're getting a lot of baseball bats," or, "We're getting a lot -- you

1 know, we've pulled several people with guns," or body armor, that kind of thing, if those
2 kind of conversations ever are then - you take that information back to people close to
3 the President, just so he is aware of what kinds of things people might be trying to bring
4 in or just have on them when they're going through the magnetometers.
5 A There are times when I would definitely brief, you know, other staff, yeah,
6 depending on what staff is there, on issues such as that.
7 Q Okay. So you mentioned briefing the President. Let's pull up exhibit 13.
8 We understand, Mr. Peede, that there was a meeting just off of the Oval Office on
9 January 4th that Katrina Pierson attended. This is a copy of an agenda that she
10 prepared ahead of time. You can see here that for this "Meeting with POTUS," since the
11 document is captioned, the list of attendees includes POTUS, COS Meadows, Katrina
12 Pierson, Dan Scavino.
13 We understand that, in fact, Mr. Meadows and Mr. Scavino did not attend this
14 meeting, but we have learned that Max Miller was there and also that you were there for
15 some or all or part of this meeting.
16 Do you recall being in a meeting with Ms. Pierson at the White House on or about
17 January 4th?
18 A Yes.
19 Q Was this the same time that you briefed the President on the logistics of the
20 Ellipse event?
21 A It would have been at the end of the meeting.
22 Q Okay. So to your recollection, you attended the whole meeting that Ms.
23 Pierson was at?
24 A I don't know if Ms. Pierson. I was there. And then I -- after she did her
25 part, I was -- I did a quick briefing just to tell him, you know, one minute of the event

1 logistics, which I went over.

2 I'm not sure if it was at 3:30. I don't have a recollection of the time, and I don't

3 have access to my calendars, since they're on my official emails. But I do remember the

4 meeting.

5 Q So what we understand is that Ms. Pierson asked for this meeting to help

6 navigate some dispute about who would be appropriate to put on stage with the

7 President.

8 And as you can see here, the background on this agenda that she prepared has

9 some background information about Women for America First, which was the permit

10 holder, where they are and where they came from -- if we scroll down, Jacob -- saying

11 that they were, you know, they had this bus tour, and they have released other permits

12 that they had previously obtained to allow other organizations to participate in and

13 around D.C., including on January 5th.

14 And she also clarifies in her agenda that there is a Stop the Steal Coalition and a

15 Stop the Steal Organization, and that those, they participate in the coalition, but the two

16 things are different.

17 And up for discussion here, according to Ms. Pierson's agenda, was event flow and

18 speaker lineup. And you can see here what she had, recommendations written down.

19 "Keeping the Ellipse portion intimate and official to control the narrative. Limit

20 to 2016 surrogates," and in parens here, "(vetted and on your team, not their own).

21 Eliminate convicted felons that could damage the other speakers." And, "Keep the

22 fringe on the fringe. We have alternative states available." I think that might be a typo

23 for stages. But in any event, alternative places available.

24 Do you recall Ms. Pierson running through these topics with the President on

25 January 4th?

1 A Ms. Pierson had conversations with the President in the dining room. I
2 have a predesignated seat, which is at the far end of the table. And, quite frankly, as
3 I've said numerous times now, I stay in my lane. None of the preprogram speakers have
4 anything do with my operation since the President will not be there.
5 So I did not participate in any part of her speaker flow. I was there for the
6 logistics of the President. The President always sits -- I sit as far as I can from him for
7 COVID protocols because I'm with him a lot at events.
8 And Ms. Pierson sat direct -- he is at one end of a longer conference table. I'm at
9 the other end. Ms. Pierson was directly beside him. So having their discussion, which I
10 wasn't a part of. And I do not recall Max Miller being a part of that conversation.
11 Q Who else do you recall being in the room?
12 A That was it that I recall. I mean, there could have been a valet coming in to
13 pass a message or a staffer, but there were no -- in a vast majority of that meeting it was
14 just the President and Ms. Pierson, you know, doing what they were doing. And Max
15 and I were just waiting for their turn -- or our turn.
16 Q So looking at the agenda here and this event flow and speaker lineup, does
17 that track with what Ms. Pierson spoke with the President about on January 4th?
18 A I didn't participate in that part of it. So I really -- I was told that she was
19 there to discuss speakers, but I didn't participate in that part. And, frankly, I was busy,
20 you know, putting notes on paper that I would brief him for.
21 Q How big is the dining room off of the Oval Office?
22 A It's not extraordinarily large, but it's also, you know, a conference table
23 that -- you know, it's hard to -- probably 10 people, 10, 12 people. It's not as big as, say,
24 a conference table in the Eisenhower Room where we usually do these, a much bigger
25 room.

1 But they were into one corner of that table. Max and myself were at the far end,
2 which is our usual place over the last multiple years for both of us when we were both
3 directors in Advance.
4 Q So is it your testimony that you were present but not listening to the
5 conversation? Or how would you characterize that? Because we would like to ask sort
6 of what your recollection is of that conversation and, in particular, the President's
7 reaction to the information Ms. Pierson was presenting.
8 A I remember being in the room. I was not paying attention. I was writing
9 my own notes on my piece of paper saying, remember to tell him it's in the center of the
10 stage, remember this, remember -- just sort of my talking points.
11 So he likes to be briefed very quickly, and things that, you know, are not important
12 to him, he just wants to get into his head the visual. Usually, I have 30 seconds to give
13 him a briefing.
14 So I'm not -- I'm just not participating, and I'm not tracking or listening to what
15 they're saying because, frankly, it doesn't affect what I do for the President. I do the
16 logistics and what happens in what we call the preprogram, which would be speakers
17 before him.
18 When he gets on stage -- generally, when he leaves the White House, for example,
19 there is just music playing. Or when he lands at a rally, there is nobody on stage. The
20 only thing I care about is what's happening once he's on the ground.
21 So who's speaking. And, frankly, I have no idea who most of these people are,
22 you know, now looking back at it. So I just didn't participate in it.
23 Q So if we go to the second page of this exhibit, this is also a document that
24 Ms. Pierson brought with her. You can see here it's a chart, but I'll tell you it is supposed
25 to be different segments for the Ellipse rally.

1 And I believe this basically captures the proposal from Ms. Pierson about what the
2 rally could look like if some of the, quote, "fringe speakers" were excluded.
3 And we see in there some handwritten notes. Like, for instance, under Members
4 of Congress, I believe it's supposed to be Nunes, but another name, Jordan. You see Mo
5 Brooks is written. Further down, under promo video, we understand that that
6 handwriting is supposed to identify Senators, including Cruz, Hawley, and Blackburn.
7 And then further down, at the bottom of the page there is -- you can see the bottom right
8 there, that's supposed to say, "No Rudy."
9 It's our understanding that these are Ms. Pierson's notes reflecting feedback from
10 the President about who he would like to have speak and not speak, and including the
11 amount of time, you know, that people could speak.
12 So, again, I just want to make sure I understand. Do you remember the
13 President offering this feedback to Ms. Pierson about who should speak and participate at
14 the rally?
15 A No, I don't. And I haven't seen this document. But, yeah, I didn't see this
16 document the day of. As I said, I wasn't -- I just wasn't participating in it. They were in
17 a corner of a table discussing whatever they were discussing. And I was just there for
18 another part of the meeting.
19 I know it sounds crazy that you're not sitting there listening to every word the
20 President of the United States says, but my job is to do my part and not participate in
21 things that aren't my job.
22 Q And I can appreciate that. I do -- I don't have it as an exhibit to show you,
23 but I can tell you that we know from text messages exchanged immediately following this
24 meeting between Katrina Pierson and Max Miller that Mr. Miller tells Katrina something
25 to the effect of great job killing some of those speakers.

1 I just want to make sure that we're clear about whether you really remember any
2 of this stuff and if you remember Mr. Miller participating in the conversation.
3 A I don't remember Mr. Miller. He was sitting right next to me talking during
4 that entire conversation. And, obviously, I'm not part of that text chain. So you'd have
5 to ask Mr. Miller about that.
6 But I'm very clear in that I was not taking part of this and I don't have any
7 recollection. Like I said, I'm literally zoning out to do what was important to me, which
8 was to get ready to brief the President.
9 Q Understood. We also understand that at some point during this meeting in
10 the dining room there is a discussion about having potentially 10,000 National Guard
11 members in D.C. to help protect rally attendees. Do you recall any conversation about
12 that?
13 A No, and that certainly would be outside of my purview. I certainly don't
14 remember that. I would be shocked if there was a conversation like that with --
15 Q Well, you can see here. That is what we understand this notation in the
16 middle of the page, "10K Nat Guard," by Ms. Pierson on this agenda that she brought with
17 her, which we understand was during the time that you would have been in the room as
18 well.
19 A Yeah. I certainly remember no conversation about deploying National
20 Guard.
21 Q We also understand that during this meeting with Ms. Pierson the President
22 made a comment about marching with his supporters to the Capitol.
23 I think you have been clear about this, but again just to confirm, did you hear the
24 President say anything about marching to the Capitol with his supporters during this
25 meeting with Ms. Pierson?

1 A No.

2 Q But, again, it sounds like you weren't particularly listening or participating in

3 that conversation. Is that fair?

4 A Yeah, it's -- yes, that is fair.

5 Q Do you recall any conversations around this time period, not limited to only

6 this Ellipse meeting with the President but in this time period, conversations about Ali

7 Alexander?

8 A I don't recall any conversations about Ali Alexander. And to my knowledge,

9 I actually never heard his name until media reports after January 6th.

10 Once again, you know, I only concern myself with logistics once the President's

11 there. To my knowledge, he was never on a stage, he's never been backstage with the

12 President at any event that I was at.

13 Q Did you go with the President to his speech in Georgia on January 4th?

14 A That's the Dalton event?

15 Q Yeah.

16 A I don't believe so. I'm pretty sure I didn't given that I was at this meeting.

17 I would have been highly likely to have had to already left to the airport if this event

18 was -- this meeting was really at 3:30. The only way for me to verify that would be to

19 check my White House calendars, which, like I said, maybe you have access to. I don't.

20 Q And the last thing I'll show you on this is exhibit 14.

21 Exhibit 14, you can see, there's a -- the header across the top. It says exhibit 14,

22 page 1. But it's an email from Megan Powers, and it's to a whole panoply of folks, but

23 including Jared Small. You are listed. Max Miller. I believe that's supposed to be

24 someone -- maybe Tim. Yeah, it's Tim Unes at Event Strategies, Justin Caporale, Hannah

25 Salem, additional folks listed on this too, with the "Speakers for tomorrow." The time

1 stamp is January 5th, 2021, at approximately 10:45 p.m.

2 And you can see listed here a chart. And in the email Ms. Powers writes,

3 "Senator Blackburn is no longer attending. They are concerned about her being back to

4 the Capitol in time. Hawley is still pending."

5 Just to confirm, you're copied on this email, but did you have any role in

6 coordinating or scheduling people who would speak at the Ellipse rally?

7 A No, no. As I said, my direct role, obviously, my Advance team is there and

8 would be involved in the, you know, not in who speaks, but the sort of -- we call this a run

9 of show document. This is a fairly typical document for us. It's created for every

10 event.

11 We would be working with the host organization, whoever that may be, to, you

12 know, to create things. So, you know, we see who is there. But -- and the people on

13 that list, obviously, were people that were working with the host organization.

14 And given that videos, things of that nature, that are going to play, that's just

15 standard information. Especially the doors open, soft open for us, that tells us when the

16 Secret Service will be prepared to let certain people in and then the general public.

17 But this is a typical what I call run of show, an ROS. You may see that in other

18 documents.

19 Q So now I'm actually to the point where I'd like to just understand, you know,

20 if you could walk us through the morning of January 6th, what you did, what you saw,

21 where you were at the Ellipse event.

22 A Sure. Sure. Would you like me to start with how my day started once I

23 arrived at the White House?

24 Q Sure.

25 A I arrived at the White -- in my office, you know, put on my radio, obviously,

1 proceeded out of the Executive Office Building down 15th Street, because I wanted to
2 look and see, you know, how the crowd was. And then I was going to walk from 15th
3 Street down to Constitution, make a right onto 17th, you know, down.
4 And then at 17th Street, which is where the Secret Service metal detectors were, I
5 was verifying that the event crew, Justin, Tim, and their coworkers, had set up what we
6 discussed, which was bicycle barricades around the Ellipse, the Secret Service perimeter.
7 I walked down 15th Street, 17th Street -- excuse me, Constitution at that point
8 was fairly crowded from 15th Street going toward the mags, which is not uncommon.
9 And I proceeded up and around the -- up into the National Mall by the Washington
10 Monument to get around to 17th Street, proceeded to the metal detectors, checked in
11 with Secret Service, proceeded to go backstage, talk to the audiovisual crew, talk to the
12 Advance crew, was introduced to, you know, the people I didn't know with the
13 audiovisual crew, things of that nature, some of the hosts.
14 And then I proceeded to go to the offstage announce, which is where the
15 President would arrive, and wait on the President's arrival.
16 I don't know if you would like me to continue from there or just allow you to ask
17 questions from that aspect of it.
18 Q No, I think you can keep going at this point.
19 A Okay. So from my standpoint would be at the arrival location for the
20 President. These are very typical since there were many former advance people. It's
21 cookie-cutter for us of where the car arrives, how it comes through.
22 The President arrived. He did sort of his standard arrival, checked the speech.
23 We showed him on the TV what the crowd looked like, what the camera shot was going
24 to be. There were some family members there and things of that nature, you know,
25 staff. We got everybody into the positions.

1 And the President then from there was introduced. It's a fairly typical introduce
2 where we push a button on the computer. The computer plays his introduction.
3 Music goes right after that. He walked on stage. He makes -- starts making his
4 remarks.
5 At that point, once he's on stage, I tend to check on media logistics to make sure
6 the cameras are getting it, because, obviously, we want the -- you know, the media -- if
7 the media is not covering the event, then, obviously, we failed our mission. I helped
8 escort some reporters to a lift so they could get an aerial view.
9 I then went and watched the Secret Service metal detectors for a few minutes and
10 then proceeded back to OSA to be there when the President finishes his remarks.
11 I don't generally stay in the tent. I've got other duties to make sure everything
12 logistically is working for the event. So in my case, I tend to hear when he's saying, you
13 know -- when he starts, you know, getting ready for his ending. It's a fairly typical
14 ending. That allows me to know when I should start making my way back to where he
15 is.
16 He came offstage. There was no interaction that I remember at that point.
17 Walked back to his car. He departed.
18 I stayed at the Ellipse to say thank you to the people that put it on as far as the
19 audiovisual technicians that, you know, I've worked with for years and things of that
20 nature. And then I proceeded to walk from the Ellipse back to my office.
21 Q So thank you for that. That's a helpful overview.
22 A couple of clarifying questions.
23 You mentioned OSA. Maybe you said what that stands for.
24 A I'm sorry, yeah. OSA, offstage announce. So it's the area right off -- you
25 would think of it in a typical production. There is a green room where the principal

1 would be. Generally, we don't have green rooms on these events because President
2 Trump doesn't like to use green rooms. He comes out of the car and goes on stage
3 generally.
4 OSA is the area directly off the stairs in this case, or directly offstage. You would
5 think of it in a ballroom or in a theater production right off the curtain, you know, where
6 the actors come onto the stage. But we just designate it as OSA, for offstage announce.
7 Q And you, I think, mentioned the Executive Office Building. Is your -- I
8 should have clarified this -- is the White House Advance Office in the Eisenhower
9 Executive Office Building?
10 A Yes, it is. It's not part of the West Wing.
11 Q You don't have an office in -- when you were the Director of White House
12 Advance, you didn't have an office in the West Wing?
13 A Correct. No, my office has always -- for at least the last 20 years has
14 been -- at least 20 years, maybe 30 years, has always been in the exact same office in the
15 Eisenhower Executive Office Building for all administrations that I'm aware of.
16 Q Now, at some point during that morning, I think as you know now, there
17 were bombs discovered in the area of Capitol Hill outside the DNC and the RNC. Do you
18 recall when you learned about the discovery of those explosive devices?
19 A I don't recall when. I believe it was after the President had departed. I
20 probably would have gotten a heads-up that something like that had happened.
21 Q Yeah, you anticipated my next question, which was, had you learned about
22 that wall either before or while the President was at the Ellipse, how would that have
23 affected your duties as Director of Advance?
24 A It would not have affected my duties directly because I'm not part of the EA
25 team, as I discussed early. It would have -- it probably would have resulted in what I

1 refer to as the pucker factor for the Secret Service, that they would have started
2 hardening up with some assets that aren't normally visible.
3 That would have been my thing. That would have been my first call, is that
4 things would start hardening up around the stage and things of that nature.
5 Q And to the best of your recollection, that hardening up didn't happen, at
6 least as far as you saw?
7 A I didn't see any hardening up. But I have to say there was a lot of Secret
8 Service and Federal law enforcement around the Ellipse. So it was fairly hard already.
9 Q So what was your impression then of the atmosphere at the Ellipse that
10 morning?
11 A The atmosphere in the Ellipse was like -- almost like any other event that
12 I've, you know, attended over -- during the campaign cycle.
13 Like I said, I was inside the Ellipse. It was a much smaller crowd. Obviously,
14 there was a large crowd outside the Ellipse, but that wasn't part of anything we had any
15 planning, any development with.
16 Q And I think you said you did not go with the President back to the White
17 House. Is that right?
18 A Correct. I walked back to my office -- or back to the White House complex
19 after he departed. Actually, after -- I was there until after he arrived back at the Oval.
20 Q Okay. So if the President had made any remarks on his trip back to the
21 White House that he wanted to go with people to the Capitol, you wouldn't have been
22 present to hear that?
23 A I would not have been present to hear that.
24 Q I want to ask you, just from your professional experience having previously
25 been the head of the Vice President's Advance team, how, if any, coordination would

1 have had to work between the Vice Presidential Advance team and the Presidential
2 Advance team when there's both -- when there's two sort of offsite D.C. appearances
3 happening at once?
4 A The Director of Vice Presidential Advance at that time, Aaron Chang, and I
5 have been working since he was in the Bush administration. He was Director of Advance
6 for the Speaker. And, frankly, I was the one that recommended him for his job as
7 Director of Advance for the Vice President.
8 We have a very close relationship where we'd pop into each other's office and
9 discuss logistics continuously. But as far as from an official staff level, we would not
10 have coordinated the EA teams. You would need to talk with the military and the Secret
11 Service. The EA teams would have been in contact with each other just due to
12 continuity of government concerns, needing to know where both principals are at all
13 times.
14 Q So did you -- and I think you said it was Mr. Chang -- did you have any
15 informal conversations about what the Vice President was going to be doing that day and
16 what the President was expecting? Because it was certainly in the news at that point,
17 this push-pull with the Vice President presiding over Congress.
18 A Agreed. I do not remember any conversation between -- official
19 conversations between Aaron and I. I am sure we were talking on the phone.
20 Obviously, as a former staffer to the Vice President, I was aware of the things, but there
21 was nothing official.
22 Q All right. And do you recall or do you remember when the President made
23 comments about, "Let's all march down to the Capitol, I'll be with you"? Do you recall
24 that moment?
25 A No. I think, as I was saying, you know, I was either in the lift with

1 the -- going up to the -- up into the sky with them or at the mags.

2 Really I try to tune out the speech in general. It's because rally speeches are all

3 very similar. And so I know sort of the ending. So that's the only time I start paying

4 attention, is when I need to do that.

5 A lot of times, I mean, they're on my phone. I'm listening to radio traffic, you

6 know, which is constant because of what, you know, the things I am monitoring when it's

7 going on, on different frequencies. So one of my ears is always yelling at me.

8 But I just -- I don't pay attention to the speeches, whether they're political or not.

9 I didn't -- I don't recall hearing any of that. I mean, I've seen it since in the media.

10 Q Fair enough.

11 With respect to radio traffic and your awareness of what's happening on the

12 ground during the rally, do you remember any security incidents or conflicts that rose up

13 during the course of the Ellipse event?

14 A I don't remember anything, but I am subject to a lot of email traffic. I

15 actually have -- I actually monitored one of the people that monitored the Secret Service

16 frequencies also. In case they need to talk, they can call me.

17 So I don't recall any Secret Service traffic, you know, besides crowd is, you know,

18 10,000, or whatever the number may be, through mags. POTUS leaving the Oval Office,

19 POTUS arriving site one.

20 Yeah, the call signs that we use, it's the best way for me to have up-to-date

21 information because I don't have a staffer generally in a car in the motorcade if we're just

22 coming to the Ellipse or somewhere in D.C. So the Secret Service's radio traffic is my

23 411 of how to get information.

24 [redacted] I think that my colleague, [redacted], has some more "day of"

25 specific questions for you. But before I hand it off to him, I'll just pause and see if

1 anybody has any Ellipse rally questions before we move away from that subject.

2 All right. I don't hear any. So, [redacted], do you want to step in here for a minute?

3 [redacted] Sure. [redacted]

4 BY [redacted]:

5 Q Mr. Peede, my name is [redacted]. I am a senior investigative counsel

6 with the committee as well. I just had a few follow-up, kind of along the lines of what

7 [redacted] was speaking with you about.

8 So I understand, based on what you just said, that you were at the -- what you

9 called the OSA tent before the President's arrival and it sounds like throughout his

10 speech. Is that correct?

11 A I was there before arrival. Once he went on stage, I was no longer in that

12 OSA tent. I was, as I said earlier, checking on, you know, videos, technology, helping

13 make sure the staff was escorted to the lift. For example, the White House

14 photographer, other photographers, so they could get an aerial view. And then went to

15 the thing. I probably returned to OSA, I'm guessing, a few minutes before his speech

16 ended. Something like that.

17 Q Okay. Where was -- I'm sorry, go ahead.

18 A No, I would just say in that area. OSA is backstage. It's in a nonpublic

19 area, a secure area. So I may not have been in the OSA tent. I may have been outside

20 the OS tent. I could have been, you know, backstage in the porta potty. You know,

21 just wherever I may have been. But I was, you know, backstage before he got back,

22 before he got off stage.

23 Q For those activities you just described, they all occur backstage, though, not

24 where the crowd is, for example?

25 A Oh, well, no, escorting press. So if you're -- I don't know if you're familiar

1 with the layout there or the general sort of layout of the events, of a large-scale event.
2 You know, there's the main stage, and then there is a barricade, you know, bicycle rack
3 barricade, which we refer to as the buffer, generally 10 to 12 feet away from the stage.
4 That's a Secret Service perimeter.
5 And in this case there was -- let's call it a VIP section. Technically, it was a seated
6 section. So say you have a thousand chairs. And then that is another layer of
7 barricades.
8 That's more of a known audience. So it could be Members of Congress, it could
9 be members of the White House staff, it could be friends and family, it could be donors,
10 whatever, you know, normally would have better seats.
11 Then there is that -- after that, there is the standing audience and the press riser.
12 So if I was going to what I call the aerial lift, that was an area behind the press riser. If I
13 was going to the -- which would be closer to the driveway, the main entrance of the
14 Ellipse, where you would enter off of Constitution when you take that right and to park in
15 the Ellipse if you're familiar with that area. It's where the car gates are.
16 Secret Service mags were further down the Ellipse on the edge of Constitution and
17 17th. And I would walk down to this, but inside the mags, but never leaving the Ellipse
18 proper.
19 Q Understood. All right.
20 So if we could start with the tent beforehand. Who else was in that tent?
21 Specifically, I'd asked about any White House staff or family members of the President
22 that you recall.
23 A The only family members I remember is because there was obviously a
24 posted video that had me on it, so I remember seeing that. I believe it was Don, Jr., and
25 Kimberly. I don't remember if there were any other family. I just remember because I

1 saw the video the next week.

2 Q Do you remember speaking with either of them?

3 A With Don, Jr., and Kimberly, no. I don't have a relationship with them. I

4 may have said hello.

5 Q Okay. Do you remember hearing what they were talking about?

6 A No.

7 Q Do you remember hearing what anybody was talking about inside the tent,

8 as far as expectations for the speech or what they were?

9 A No. Generally, I would come in. It would be traveling staff. So it would

10 have been like -- and I don't remember if these people were there. There would have

11 been -- our typical traveling staff would have been probably Dan Scavino.

12 There probably would have been somebody from what we call the Staff

13 Secretary's Office, which is, you know, the paper pusher. Every piece of paper that goes

14 inside of an administration runs through -- should run through Staff Sec.

15 There is generally, you know, I would assume somebody from the press shop,

16 whether it's the Press Secretary, a Deputy Press Secretary, I don't remember who was

17 there.

18 Obviously, a Secret Service detail. Obviously, a White House valet, who is just

19 there for, you know, personal needs, water, you know, things of that nature.

20 There is somebody, generally, from speechwriting, at least one person from

21 speechwriting. They immediately go to the teleprompter operator. And the President

22 usually goes over to the teleprompter operator in the speech, and, you know, makes

23 tweaks to his speech.

24 But it's a fairly crowded area there. We tended to try to keep people away from

25 that just because we were in the midst of COVID obviously. And this would be the

President looking over somebody's shoulder, somebody else looking over the teleprompter operator's shoulder. A tight-knit group.

And there would have been somebody from Advance Office, the lead advance or the personal aide for the President.

That's our typical package. And without being able to recall, some segment of that would have been there for sure.

Q You mentioned the speechwriter. I think earlier you mentioned making sure that the President's remarks were loaded, or something to that effect.

Do you remember who the speechwriter was for that event?

A I don't.

Q Okay.

A I know there was a name mentioned earlier by [redacted], but I'm not aware if that was him or not, if he was just the one working on the speech.

Q All right. And you don't remember any of those people -- or anybody in the tent, for that matter -- talking about their expectations for the event or for the President's speech?

A I don't because it's just not my area. I'm more worried about looking at my people. For example, is the actual hard copy of the speech on the podium in case the teleprompter fails? Did they actually put water on the podium in case he needs a drink of water? Is there anything that he needs to know about before going on?

So I'm sort of doing my checklist of things that, you know, will screw me if they're not done, which is, you know, is there a trip hazard on the stage? Is, for example, with ballistic glass, has the glass been cleaned in the last few minutes, because it seems to attract every bit of dust in the world, and that's something the President harps on.

Q Did you see the President arrive to OSA?

1 A Yes, I was at OSA when he arrived.

2 Q What did you notice? What was his mood? Did he say anything?

3 A Generally, he's business, all business. When he comes in, he'll say hi sort of

4 as he walks by. And he generally doesn't like -- he never goes to hold. So he likes,

5 once he's there, he likes to get on stage. So it was just like any other day of the, you

6 know, the last thousand days.

7 Q Did he seem upset or preoccupied with anything?

8 A No, no, just normal. Nothing that I can recall at all. It seemed like a

9 normal day to me. There is nothing I remember that was any different than any other

10 day. It was cookie-cutter for us.

11 Q All right. So he went up to give his speech, and it sounds like you were

12 walking around the area when he was doing that.

13 Did you notice the crowd, anybody in the crowd leaving from the President's

14 speech?

15 A Leaving from the speech? No. But, I mean, like I said, I was inside the

16 Ellipse thing, you know, obviously. I don't remember anybody leaving.

17 I mean, as speeches go on, and they get longer and longer, I don't remember even

18 how long the speech were, people tend to leave because they want to get to their car and

19 beat the crowd out. And that's, you know, like at a rally.

20 But I don't remember anybody leaving. There was no mass exodus that I saw.

21 Q When you were walking around, did you hear people talking about leaving or

22 marching to the Capitol to protest?

23 A No, but I was in fairly -- pretty much every area I was in was a restricted

24 access area. So I would have -- it would only be the people I was with or escorting,

25 which tended to be members of the national press or, like, a White House photographer.

1 Q Earlier you mentioned Members of Congress. I think you did so in the
2 context of maybe in the VIP section. But did you work with any Members or their
3 offices, particularly advance people or schedulers, related to this event?
4 A I did not directly. I'm sure my Advance team was coordinating with people
5 that called them to help with parking and things like that.
6 That would be a coordination like, for example, Alex Stone, who was mentioned
7 earlier, what her job was. Those would be the kind of people that would get a parking
8 pass or something to get somebody close.
9 But our guys would definitely coordinate with them. They would also coordinate
10 with Secret Service if there was somebody who had a Capitol Police detail so we could
11 make sure that, you know, we interfaced, to take care of anybody with a protective
12 detail.
13 I'm not sure, I doubt any of the people that were there were ranking members
14 that would have a security detail.
15 Q Do you remember hearing about any of those type of coordinations
16 happening through members of your team or otherwise?
17 A No, no. But I felt sure they were. It just -- it never gets to me. It's
18 something that would be handled on the ground.
19 Q All right. So afterward you said you returned to the OSA tent maybe a
20 couple of minutes before the President wrapped up his speech. Is that right?
21 A Yes.
22 Q Do you remember him coming off the stage?
23 A I remember him coming off the stage.
24 Q What do you remember about it.
25 A I just remember it was a very high -- it's a very high stage, a lot of steps.

1 Steps make me nervous any time anybody is walking on them. That's why we do them
2 off camera.
3 But he came off stage and proceeded to the limo. We were just, you know,
4 standard event.
5 Q Did he stop and talk to anybody after getting off stage while he was in that
6 tent?
7 A I don't remember anybody specific. There is a gaggle that walks with him,
8 so I'm sure he would have been talking to whoever was the senior staff that would have
9 been walking with him. But it's the standard gaggle of people that would have come in
10 the motorcade.
11 Since I am not going back in the motorcade, I don't proceed with that gaggle. In
12 general, I would walk, if it was, say, in an arena, I would walk in front of them because
13 they don't know where they're going.
14 In this case, it was a one-way tent, 15 feet from the car. So there was no need
15 for me to show them how to proceed to the other end of the tent.
16 Q Fair enough.
17 Do you remember hearing any of them speaking to the President or the President
18 speaking to that gaggle?
19 A No, because I wasn't part of the gaggle. I would have been behind them at
20 that point. They would have had their backs to me walking away from me.
21 Q And after you returned to the tent but before -- so backing up a little
22 bit -- before the President comes off stage, what were the conversations in the tent like?
23 A I was probably -- and I, you know, like I said, I don't, because for me it was a
24 standard day at that point -- I was probably talking to the valet. You know, do we have,
25 you know, do we have a towel? Do we have, you know, a Diet Coke?

1 Talking to the Secret Service lead there and my lead. Are we good? Is there
2 anybody we need to put in the motorcade? For example, is there a staffer that needs to
3 be put in there? Is there a member of press that's being added to the pool?
4 Sometimes we do pool change-outs in the middle of an event. Just making sure people
5 get into the right car and don't get into, you know, a secure car or something of that
6 nature.
7 Q So by that time, you know, the President had made his remarks about -- or
8 was continuing to make remarks about the stolen election, about fighting, about going to
9 the Capitol. Do you recall anybody inside the tent talking about any of those things?
10 A No, no. We're all -- the people that I deal with are all in the logistics event.
11 So the teleprompter operator who is breathing a sigh of relief it was over. Military, Mil
12 Aide, White House doctor, you know, the people that travel with us, those are the people
13 that I'm coordinating with.
14 That conversation would have never occurred. We're very -- you know, we're
15 checking off our boxes to, you know, we're proceeding to go, make sure that we have the
16 doctor, make sure we have the Mil Aide, don't want to leave the football behind, the
17 communications person from the White House Communications Agency, the valet, the
18 people that are my important people that I need to make sure for continuity issues are all
19 there.
20 Q Okay. After that you said you went back to your office. Do you know
21 approximately what time you got back to your office?
22 A I would say -- I don't know what time the event ended. I just don't have
23 that with me. But I would say within 30 minutes of him arriving back at the White
24 House. I spent a little time talking to, as I said earlier, the audiovisual technicians and
25 people I haven't seen -- I hadn't seen since I left the campaign, so for, you know,

1 6 months. I said hello to them and then proceeded back to my office.

2 So if he spoke at 11 -- I'm assuming we were probably not on time, but we were,

3 say, 11, say, he spoke for an hour, 12, say 12:30 to 1, I'm just guessing.

4 Q So my understanding is that he wrapped up around 1:10, if I'm not mistaken,

5 and then headed back to the White House shortly after.

6 So do you think -- is it fair to say, based on your recollection, you were back in

7 your office probably by 2-ish?

8 A If he ended at 1:10, yes, it's fair to say that.

9 Q All right. And what happened when you got back to your office? What

10 did you do?

11 A I remember coming to my office. My office was fairly full that day because

12 it was the end of an administration. So we were WAVE'ing some volunteers in,

13 WAVE'ing the White House access visitors' log. People -- in some of the final days the

14 White House gift shop would be open, so we were WAVE'ing people in so they could

15 come and buy souvenirs from the administration, the official White House gift store, and

16 say goodbye to some of my staff.

17 So there was, you know, people that had been volunteers for us for a long time

18 that had come into our office just to say their goodbyes and to do one final look around

19 the Executive Office Building.

20 Q When did you first find out about the attack on the Capitol? I assume it

21 was that day, but I don't want to make that assumption.

22 A My office monitors all the news channels constantly. So in my office there

23 is always a quiet screen with the broadcast networks. So I would say when I returned, I

24 was seeing it in real time. I was watching it via media. There was no other notification

25 to me.

1 Q Did you have any role at all in addressing or dealing with or responding to
2 the violence at the Capitol?
3 A No role at all.
4 Q Were you asked to go to the White House -- and when I say White House, I
5 know you're in the Executive Office Building -- but over to the West Wing, or anywhere on
6 the more direct House campus?
7 A No. And like I said, the Advance Office, if you're referring, I guess, to
8 the -- to his remarks or the communications part of that, once they reenter the White
9 House, we don't have a role there. But I was not asked to come to the West Wing.
10 Q Were other people in the Eisenhower Executive Office Building doing
11 anything to address what was happening at the Capitol? And I guess I would refer
12 maybe to, I believe, General Kellogg, General Keith Kellogg had an office over there as
13 well. So I'm just wondering your eyes and ears in the building.
14 A Well, like I said, I had an office full of, you know, former Advance volunteers.
15 I don't remember walking out of my office until I departed the office that day, but I'm not
16 aware of any other interactions of other entities inside the White House, and certainly
17 not with General Kellogg.
18 Q Okay. And when you saw what was happening, did you draw any
19 connection between what was happening in the Capitol and the President's remarks to
20 march to the Capitol during the rally you attended?
21 A Well, as I said, I wasn't really paying attention to the remarks. I was doing
22 my normal job. So I did not draw any conclusions of the two being combined or
23 connected.
24 Q Okay. Now, you mentioned Aaron Chang, I believe his name is, the person
25 who does advance work for -- or did advance work for Vice President Pence. Is that his

1 name?

2 A Yes, it is. He is my counterpart in the Vice President's office.

3 Q Did you talk to him on January 6th about what was happening?

4 A I did not at the time. He was -- now, I understand. He was not working

5 that day. He was not with the Vice President. He was at the Capitol later that night.

6 They tended to work on a split shift if it was going to be a long day, and he had the, I

7 guess, the evening shift. I did talk to him later that night.

8 Q What did he tell you when you talked to him?

9 A Our conversation was of a personal nature. We're close friends. I,

10 obviously, respect the Vice President and his family and know them very well. And it

11 was just a personal call to make sure all of our friends, all of the military people that

12 travel with him, everybody was okay.

13 Q Okay. And when you say "personal," I mean, it's still probably related to

14 the events of that day? Is that fair?

15 A No, we didn't talk about the related to that day. As I said, he wasn't there.

16 My question was more, is everybody okay? How is the Vice President? How is the

17 family? The Mil Aides are friends of mine. Secret Service agents are friends of mine.

18 Obviously, the Vice President's staff, some of those people I hired, they're friends of

19 mine. And so it was one of, you know, concern, make sure everybody was okay.

20 I didn't have an access to the intelligence to know who was there that day or, you

21 know, what transpired inside the building besides what we all saw in the media.

22 Q Did he say everybody was okay?

23 A Yes.

24 Q Did he say anything else about them being, you know, frustrated, upset,

25 inconvenienced, anything at all?

1 A We didn't talk -- he wasn't there during the movement of the Vice President.
2 He was there, I guess, after the all clear. I don't think he was in until after the all clear at
3 the Capitol.
4 It's nothing we would have -- and, frankly, we're professionals. We wouldn't
5 have delved into that with not knowing what's going on.
6 Q Have you talked to him since about the activities of that day?
7 A I talk to Mr. Chang routinely. We're very old friends.
8 Q Has he told you what happened while he was at the Capitol on the 6th with
9 the Vice President?
10 A He wasn't there when the -- you know, when it was happening. He was
11 there that night after the Capitol had been given an all clear.
12 Q Understood. And that's a fair point, and I appreciate the distinction when
13 he was there and when he wasn't there. But have you talked to him about what
14 happened when he was there?
15 A I'm sure I have. I don't recall a specific instance. I mean, everything that I
16 know about what's happened is I have seen on the media. You know, I think we
17 all -- you know, we've seen hours and hours of footage.
18 I don't recall, you know, specifically, talking about his role there. Some of the
19 issues that we would have discussed involve continuity and relocation of the Vice
20 President. We would not be having that conversation on our personal cell phones,
21 because both of us were part of the Vice President's -- the Emergency Action team.
22 So --

1

2 [1:12 p.m.]

3 BY [redacted]

4 Q And I'm sorry if I misheard or misunderstood what you just said, but did you

5 have conversations about that, the continuity and ensuring the Vice President's safety

6 that day?

7 A No, no. That's what I'm saying. We would never -- if we were just talking

8 randomly on a phone call, we would never discuss on an open line anything. We have

9 not had a discussion, if that's the question you're asking, about continuity and the Vice

10 President's safety. And if we did, it would only -- you know, it would only take place

11 inside of a SCIF.

12 Q Okay.

13 A And, obviously, neither one of us have access to a SCIF.

14 Q And I believe in response to my question about speaking with Mr. Chang

15 about the events of that day you said that he didn't essentially -- but I don't want to put

16 words in your mouth, but essentially he didn't tell you anything that you didn't also learn

17 in the news. Is that right?

18 A Correct. I mean, everything I can remember has been items that have been

19 in the news. And as I said, he wasn't there, and I had zero conversations with the

20 advance operation that was there when the initial event took place. And I've never had

21 a conversation with him.

22 Q Great. That was going to be my next question, whether you spoke to his

23 counterpart who was there that day. So it sounds like you did not.

24 A I did not. You know, we were all very, you know, busy and, you know,

25 other things going on at that time. But I've never had a conversation with anybody from

1 the Vice President's office that was there.

2 Q That was going to be my next question. So did you talk to the Vice

3 President about January 6th?

4 A I have, I would prefer not to get into conversations I had with the Vice

5 President of a personal nature. But I have talked to the Vice President on multiple

6 occasions since then, and the conversations never reflected anything to do with January

7 6th. More of a personal nature, how are my kids. He knows my kids, I know his kids.

8 I spent a lot of time with them and their family. So it's more of a personal, how are your

9 kids, great, how are your kids, is your son still playing quarterback, you know, that kind of

10 stuff.

11 Q Sure. Normal stuff that people with a long friendly history. And that's

12 fair, Mr. Peede, and I don't mean to get into those types of conversations. But did

13 you -- have you talked to him about the events of January 6th?

14 A I've never talked to the Vice President about anything dealing with January

15 6th.

16 Q Okay. And I just want to zoom out to make sure that the scope of my

17 question is clear. Have you ever talked to him about what he perceived his role to be in

18 the counting of votes during the joint session? So maybe that was before January 6th,

19 maybe it was after.

20 A No. And I saw the Vice President probably every other day in the months

21 leading up to that, and that conversation never happened. It's just not -- it's not the

22 relationship I have. It's not in my -- I hate to keep going to the same thing -- it's not in

23 my wheelhouse. I try to respect the nature of my job, which is, you know, logist -- event

24 logistics and visual branding only, and you know, how the rest of that works out is up to

25 somebody else.

1 Q Okay. Have you -- I think I know the answer to this, but again I don't want
2 to assume -- have you talked to anybody in the Vice President's office, meaning people
3 who were there with him that day about events of January 6th?
4 A I know I've spoken to Mr. Chang. I don't recall specific instances. I am
5 sure that I've had conversations when I've seen somebody on the street, and they, you
6 know, they made a comment that it was, you know, a bad day or, you know, something of
7 that nature but no -- no prolonged conversations. No conversations about what I saw
8 went on, what they saw went on, things like that. I've tried to -- I've tried to make sure
9 that I'm not, you know, pushing myself into conversations that -- that I don't want to be
10 involved in.
11 Q Sure. Totally understand that, too. I think, you know, a lot of these
12 questions are just kind of like I said before. You're uniquely situated. Not a lot of
13 people work in the White House or for the President or Vice President, so understanding
14 what you saw and what you heard is helpful.
15 A I understand that. I think one of the reasons that I was able to live from
16 the beginning of the Trump campaign before and through the -- throughout the
17 administration, which made me a real long-termer, is that I only took care of what I
18 needed to take care of. You'll -- you know, I'm sure you'll notice that my social media
19 during the entire administration was nonexistent. I don't -- I try not to put anything in
20 social media of a political nature in anything. I don't tend to show up on most social
21 media searches, with the exception of everything that's happened regarding January 6th,
22 which is, you know, not pleasant. But I try to stay in my -- in my area and do my -- do
23 my job, so.
24 Q Fair enough. Just a few follow-ups to stuff that you had mentioned before.
25 I think at one point -- and I apologize if I misheard this -- but I think at one point you had

1 said that you had made a blanket statement, advising at some point that the President
2 not march to the Capitol. Is that right?
3 A Nothing to do with the march to the Capitol. I had made a blanket
4 statement, and this not the first time, that if we wanted to do something like that, that an
5 OTR into a -- into a crowd-unknown situation would not be something we would support,
6 myself and the Secret Service.
7 And that -- that could be many different things. That's a blanket statement.
8 I've had the same argument in North Korea. I've had the same argument in Afghanistan
9 and Iraq with principals, saying, we -- we're not going to support that.
10 Q Okay.
11 A It's just not -- so it's a blanket statement. I can't take a
12 principal -- President, Vice President -- I can take them to an ice cream shop or a
13 McDonald's or to a golf course, because we kind of know what we're doing there and
14 nobody expects us to do it. But I can't take a, you know, a leader of a country into an
15 area where I know there's, you know, a lot of people and no way for, you know, 10 Secret
16 Service agents to protect. I would need 10,000 Secret Service agents. It would be -- if
17 we went to the Capitol at that point, it would be the equivalent of doing the Presidential
18 inaugural with no fence and no Secret Service and no Capitol Police. It's an impossible
19 task for the Secret Service. So --
20 Q Okay. Just to --
21 A -- you heard me but not exactly. I was giving a blanket statement that I
22 would not support a mission to go into an atmosphere like that, but nothing to do
23 with -- there was never a conversation about, I want to drive to the Capitol with me.
24 Q Understood, understood. And did you ever have to make that blanket
25 statement or a blanket statement like that in relation to events planned on January 6th?

1 A I never had to make that statement on anything planned on January 6th.

2 BY [redacted]

3 Q Okay. If I may, Mr. Peede -- and this is [redacted] again.

4 A Sure.

5 Q It just so happens the interesting number you threw out about the number

6 of people that would need to go there was 10,000. As [redacted] mentioned,

7 immediately after your meeting in the White House, or not long after, Max Miller

8 commented that he and Katrina had killed an idea of the President's -- killed, his

9 words -- for a procession and the National Guard. This is during the January 4th

10 meeting.

11 Did it not come up during that meeting in the dining room an idea for the

12 President to have a procession of the sort of almost a reverse inaugural to go up to the

13 Capitol?

14 A I'm not -- I didn't hear that. I'm not aware of that. Obviously you showed

15 me the notes where it said 10,000 National Guard, but I wasn't any part of any

16 conversation, nor have I ever heard that. If I had heard that, I would have -- I would

17 have instituted what I previously said, which is, we cannot support it, and the United

18 States Secret Service cannot support it no matter what.

19 You would have to ask the Secret Service what their reaction would be on that.

20 That's outside my scope, but I'm not aware of any plan for a procession. I never talked

21 to the President about it. I never talked to another staffer about it. And it would have

22 to be higher than Max Miller to make those kind of conversations.

23 Q Did you know that Ms. Pierson was going to be at the dining room meeting

24 with you on January 4th before you arrived?

25 A My understanding -- yes, yes. I don't remember when I found out about

1 this meeting. I think that I was a -- a last-minute addition. It was sort of a, you know,
2 misery loves company meeting where I was told to come over and just -- and, you know,
3 give him a quick brief.
4 Generally, I try to brief him before we're finally set in stone, in case he wants to
5 make a change, for example, the stage or something like that, so I'm not building
6 something, tearing it down, and building it again.
7 Q You know, misery does love company. Did you expect it to be a miserable
8 discussion based on what -- what was your expectation coming in about the tone and
9 tenor of what had to be discussed?
10 A Well, I didn't know what the tone or tenor of what was going to be
11 discussed. I just know that generally, when I'm briefing the President, I, you know, I set
12 up the meeting. I call the front office at the White House -- at the -- in the oval and say,
13 Hey, I need 5 minutes of his time to talk about the event we're going to do tonight. You
14 know, we're getting ready to fly, I need that.
15 When I'm generally, you know, not aware of meetings, it generally just means
16 that, you know, it's become a hash of every subject. We just, you know, get in there, do
17 our -- you know, do our job, our portion of it, and get out.
18 Q So this was a meeting you were asked to join, not one that you asked for?
19 A Yeah, it was not a meeting I asked for. Generally, I would've just popped in,
20 you know, probably -- I think that was the same day Dalton. So I would have come in,
21 you know, and said, Hey, Dalton's a standard airport rally, or whatever it may have been.
22 And by the way, this is the -- you know, sometimes I would get from the host like a
23 graphic of what it looked like, and I would show him, say, this is what it looks like. That's
24 generally when I get in trouble. He's like, well, I don't like this look, change this from
25 blue to red, and then I'm off to the -- you know, so it was not a meeting I requested at all.

1 Q Who told you to be at the meeting?

2 A I -- I don't remember who told me. I mean, it would have come from -- it
3 would have probably come from either the DCOS office, but more likely somebody in the,
4 you know, front office of the oval said, Hey, he's going to do a meeting, can you pop in
5 here and talk to him about logistics. Like I said, it was a random meeting. That's why I
6 was in there, trying to get my thoughts together about that. It's just -- yeah.

7 Q Did you understand Mr. Miller to have also been asked to attend, or did he
8 arrive separately than you?

9 A We walked over. Our offices are on opposite sides of a -- of a complex of
10 offices on the same floor in the EOB. So we walked over there together.

11 Q Why did he need to be there?

12 A I'm not sure. I mean, obviously, you're at the same space. He obviously
13 has -- he has an eye for what the President wants, as far as event logistics. He's very
14 creative, and he -- you know, he has the -- a lot of the President's trust. Obviously, he
15 became deputy campaign manager for operations at the campaign when he left the role
16 that I had, and then I took his -- you know, the old job back, so --

17 Q And I think it has been discussed --

18 A -- trusted lieutenant for the President.

19 Q Right. And that you discussed, in your mind, this was more than like 1,000
20 you had done before day over 1,000 days, right, I mean, just a standard rally?

21 A It's a standard rally except for it's on the Ellipse, which makes it -- anything
22 you're doing close to the White House for us makes it a little bit more, you know, a little
23 different because of the nature of things.

24 But as far as logistics of what my office did, it was the same event we had done
25 1,000 times. The same build-out, the same -- even the same AV providers, the sound

1 guy, the light guy, the fence guy, the tent guy, the staging guy, same people we would use
2 every time.
3 Q So in terms of having the President's ear and trust, in terms of Mr. Miller,
4 you don't remember Mr. Miller weighing in on who should speak or who should not
5 speak?
6 A I don't remember Mr. Miller -- or I mean, obviously I know I didn't. I don't
7 remember Mr. Miller making a single comment during that entire time.
8 Q Did you have a conversation with Mr. Ornato after the January 4th meeting
9 and before January 6th about what the event was going to look like, who was going to
10 participate, and the general posture of the event? Did you brief him on that?
11 A We have a daily meeting every day that involves around operations side of
12 the White House, cybersecurity. So in his portfolio is everything that happens within the
13 White House, everything with the military office, everything with the Secret Service,
14 everything with the Advance Office, the Scheduling Office, the White House Medical Unit.
15 We have a, I would say, almost daily meeting, sometimes it might have been 3
16 days a week. It would have come up in that. I would have briefed him along with the
17 head of cyber, the head of PPD, the head of -- you know, the medical director,
18 that -- these are briefings that we do every day. I would call it almost a quick check-in.
19 We go to a meeting room. We say, you know, the President's agreed to do this event,
20 which obviously, you know, the DCOSs already know. Most everybody know, you know,
21 this is what the current situation is. If there were issues about an event site, then I
22 would, you know, do that, which might need, further, you know, things.
23 But there was no specific briefing on January 6th with just Mr. Ornato.
24 Mr. Ornato frankly was not -- not really involved in any of that logistics. That was, you
25 know, that was -- he trusted us to do our job, and I can't remember any meetings with

1 Mr. Ornato that were, you know, just us talking about logistics besides our just daily
2 briefing that we did almost every day.
3 Q The day after, so January 7th, 2021, did you speak to Mr. Ornato about what
4 had happened the day prior at the Capitol?
5 A I don't remember speaking to him on the 7th. I'm sure -- I mean, I talked to
6 Mr. Ornato face-to-face multiple times a day just to check in with -- with anything. It
7 could be --
8 Q Sure. I can be more specific. Did it ever come up with him --
9 A I don't remember talking about anything, you know, that would have related
10 to what we were doing at the White House and the Ellipse.
11 Q So no discussion with him about the President's comments on the 6th, that
12 he would walk to the Capitol and be there with the other folks?
13 A Yeah, I don't remember ever having a conversation with him about that.
14 And if -- and, you know, a conversation with me would have never gotten, you know, if
15 the President had asked me, I would have said no on the spot. The Secret Service would
16 have said the same thing. I feel sure that Mr. Ornato would have said the same thing,
17 but you would have to ask him.
18 Q And I think just the last point I had is, any conversation after the 6th in which
19 you heard either directly from Ms. Pierson, probably not, or from someone who spoke to
20 her about her view that she had helped shield the President from any criticism by keeping
21 certain speakers off the stage at January 6th, such as Ali Alexander, or Alex Jones, or
22 others, any conversations of that sort?
23 A With Ms. Pierson or in general?
24 Q Well, any -- Max Miller, who had spoken to Ms. Pierson?
25 A No. I -- no. I have had no conversations. Additionally, I have no

1 relationship with Ms. Pierson. I would guess that if we lined each other up, she would
2 not be able to pick me out between everybody on the screen right now. It's just not the
3 area that I'm involved in.
4 Q Understood. Thank you.
5 A Well, thank you.
6 BY [redacted]
7 Q And just a very brief follow-up. Did you ever speak to the President other
8 than that January 4th meeting in the dining room about his expectations for the rally on
9 January 6th, or just January 6th in general?
10 A Well, I mean, I would have told him, you know, what the stage looked like
11 and which way he was going to go on actual January 6th, when he was in OSA. I think
12 we've already covered. I don't recall being in the Oval any time after the -- January 4th,
13 and I don't remember what we did on January 5th if there was an event.
14 Q How about just even more broadly? You know, it sounds like you traveled
15 with him, you were with him at Mar-a-Lago. And, you know, we know on the 19th, I
16 believe, that January 6th becomes more of a focus for him. Do you remember ever
17 talking to him about January 6th?
18 A No. No. Because for me, it wasn't on my radar screen until, you know,
19 the tweets and stuff that you started showing, saying that, he was going, and then we
20 were starting to be notified. You know, there was a lot going -- there was a lot going on
21 while we were at Mar-a-Lago. And I tended to -- you know, I was just working on my
22 logistics. You know, I had teams that were deployed. Obviously it was during the
23 holidays, so, you know, it was a limited staff. But it's not a -- I don't have social
24 conversations with the President.
25 Q Okay. And you've used the terms DCOS. Is that Deputy Chief of Staff?

1 A Yes, sir.

2 Q All right. Thank you. Did you ever speak to Mr. Meadows about his

3 expectations for either the event or January 6th in general?

4 A No. I had a very, you know, matter of fact relationship with Mr. Meadows.

5 You know, it's friendly to say hello, but he's just not somebody I -- you know, I don't

6 generally walk into his office to sit down and have discussions with him. I report

7 through my -- my chain of command, which is the DCOS, as we talked about, and to

8 whoever -- you know, that goes to whoever the chief of staff may be.

9 But I can count on my hand just a few meetings that I've sat in, in the chief's

10 office, and none in the, you know, none in that time period.

11 Q Okay. And I know we've asked you specific questions about specific

12 people, but did you hear from anybody in the White House, campaign, anybody at all that

13 the President might march, or has talked about marching to the Capitol on the 6th?

14 A No. No. And as I previously said, I would have attempted to kill that, you

15 know, just so there's not a -- a ground swell. If somebody -- I call it the good idea fairy.

16 If the good idea fairy is talking, I want to try to make sure she never takes flight.

17 Q Fair enough. Thank you, Mr. Peede, I think that's all I have.

18 A Thank you.

19 BY [redacted]

20 Q Great. I just have one clarification question here, and I suspect we're done

21 here just in a minute or two. You, talking about being in the executive office building,

22 used a phrase "WAVE'ing" people in. I think I understand what you mean as using the

23 acronym, W-A-V-E, which I think stands for the -- it's the access and visitation

24 access -- Worker and Visitor Entry system to the White House. Is that right?

25 A That is correct. I think it stands for White House, with one word, Access

1 Visitors something something. It's a system run by -- you know, if you were coming in,
2 I'm sure as you know, when you enter the White House, they, you know, they pre-vet
3 you, run you through NCIC or, you know, the IC databases, depending on who you're
4 seeing. And that we -- my office was in charge of that for the volunteers that were
5 working for us.
6 Obviously, like I said, it was very busy for every office because people were
7 coming to say their goodbyes and to try to buy the last remaining merchandise in the gift
8 shop. Well, I meant to say their goodbyes. And that's what my office, we weren't
9 [inaudible] that we're, you know, we'd be guests at a rally or anything. We were
10 WAVE'ing in advance volunteers.
11 Q Understood. And I was really just asking the question just to make sure
12 that it was -- that it was clear in the transcribed record that WAVE'ing is W-A-V-E as an
13 acronym, and then adding sort of the I-N-G at the end.
14 A You've got it exactly correct.
15 Q Mr. Peede, have you been interviewed by any law enforcement regarding
16 your knowledge of the events or activities that we've been discussing with you today?
17 A Negative.
18 Q So you've never been contacted by the FBI regarding January 6th?
19 A No.
20 Q Okay. Have you been contacted by any of the attorneys that have been
21 representing defendants charged with criminal conduct that day?
22 A No. I've just talked to my attorneys.
23 Q Understood. And we wouldn't ask you about those conversations
24 obviously.
25 A Okay.

[redacted] So that, I think, covers all of the questions that I have. Ms. Lofgren is still with us and I know that [redacted] has been listening in, but before we wrap up officially, I'll just pause briefly to see if anyone has any questions.

Ms. Lofgren. I think this has been answered, but I want to make clear that the witness did not see the former President after he returned to the executive office after the rally on the 6th, he didn't see him further that day?

Mr. Peede. Yes, ma'am, you are correct. Once he left the Ellipse, I had no contact with the President for at least the rest of the day. It may have been longer than that time period, but you're correct.

Ms. Lofgren. Thank you very much.

Mr. Peede. Thank you, ma'am.

[redacted] All right. Well, I think at this point we've covered all our questions. It's 1:35 p.m. and we can go off the record.

[Whereupon, at 1:35 p.m., the deposition was concluded.]

Certificate of Deponent/Interviewee

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

_____

Witness Name

_____

Date