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

INTERVIEW OF: CHRISTINA BOBB

Thursday, April 21, 2022
Washington, D.C.

The interview in the above matter was held via Webex, commencing at 11:04 a.m.
Appearances:

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

[Redacted], SENIOR INVESTIGATIVE COUNSEL
[Redacted], INVESTIGATIVE COUNSEL
[Redacted], PROFESSIONAL STAFF MEMBER
[Redacted], CHIEF CLERK
[Redacted], INVESTIGATIVE COUNSEL
[Redacted], INVESTIGATIVE COUNSEL
[Redacted], SENIOR INVESTIGATIVE COUNSEL
[Redacted], STAFF ASSOCIATE
[Redacted], STAFF ASSOCIATE

FOR CHRISTINA BOBB:

JOE SIBLEY, ESQ.

Camara and Sibley, LLP
It’s 11:04 a.m. Eastern time here in Washington. This is a transcribed interview of Ms. Christina Bobb conducted by the House Select Committee to investigate the January 6th attack on the United States Capitol pursuant to House Resolution 503.

At this time I would like to ask you, Ms. Bobb, to introduce yourself, stating your name and spelling your last name for the record.

Ms. Bobb. Christina Bobb, last name B-O-B-B.

Thank you, Ms. Bobb. And if, Counsel, if you could please identify yourself as well.


Very good. So I know I mentioned this to Mr. Sibley, but as of right now, the only participants here are you, Ms. Bobb, and Mr. Sibley. Is there anybody else with you in the room, Ms. Bobb?

Ms. Bobb. No. I am alone.

Okay. Thank you. And, Mr. Sibley, I know I mentioned this to you as well, but we can’t permit you on your end to record or transmit anything. So can you just confirm that that’s not happening either through you, Ms. Bobb, or you, Mr. Sibley.

Mr. Sibley. That’s confirmed on my end.

Ms. Bobb. -- as well.

Okay. You’ve confirmed that as well? Okay. I appreciate that. Thank you.

And, Mr. Sibley, do you anticipate anybody else joining on your end?

Mr. Sibley. No.
Very good. So this is going to be a staff-led interview. As I said before we got started, my name is __________. I'm a senior investigative counsel for the Committee, and I'm joined today by __________ to my right, and __________ to his right.

Members of the Select Committee may be joining us and leaving us. You'll see them show up on the participant list in the Zoom platform, and I will try my best to announce them as well and their presence so that you are aware of them. You'll see right now we have other committee staff as well, including our chief clerk and others.

Before I begin, this is not a deposition. It is a transcribed voluntary interview, but we do have a few ground rules. There is an official reporter who's transcribing this interview who shows up in the WebEx platform participant list as well. It's also being recorded, but the official record is the transcript prepared by the reporter.

You and Mr. Sibley will have the opportunity to review that transcript after we are done and suggest any corrections before it's finalized, but because it's being taken by a reporter, it's very difficult sometimes, particularly over the Zoom or WebEx platform that we are on today, if we are speaking over each other. So I just ask that you let me finish my question before you answer, and then I in turn will let you finish your answer before I ask my next question.

Also the stenographer also can't take down non-verbal responses, like shaking your head. So it's important that you answer each question with an audible, verbal response.

Ms. Bobb. Is this also being recorded?

It is being recorded by the platform itself. Correct.

Ms. Bobb. Okay.

You are not going to be placed under oath, but because you are
speaking to a committee of Congress, there are possible consequences for providing any
knowing false statements, and that is codified under 18 USC 1001 as other federal
criminal statutes. So it is important that you tell truth at all times.

Do you understand everything we have gone over so far, Ms. Bobb?

Ms. Bobb. Yes.

Also I know that some of the events that we are going to be talking
about took place over a year ago now. And if you don't recall something, please let us
know that. Also if my questions or anybody's questions aren't clear, or you need
clarification, please ask us to do so. We'd be happy to. We much prefer that you
answer a question that you understand, rather than trying to guess at one you don't.

I talked to Mr. Sibley and understand that your role as a lawyer may have some
potential privilege issues or raise privilege issues throughout the day, and that's okay.
Let us know that, and we may have some questions about the scope of the privilege, or
who is a part of the communications. But if there is an objection, Mr. Sibley, I
understand that you will weigh in or Ms. Bobb weigh in and express that.

Under the circumstances, you can only refuse to answer a question to preserve a
privilege. And if there are other refusals that you make or, excuse me, if you decide not
to answer a question, what we would likely do is have a conversation with Mr. Sibley to
discuss that.

Given that this is a transcribed interview, we cannot seek like a ruling from the
chairman on objections, but if we need to move this to a deposition, the Committee
reserves its right to do that. I think that that's unlikely based on the conversations with
Mr. Sibley, but I do want to just make you aware of that as well.

If you do need to consult with Mr. Sibley at any time, please let us know. We are
happy to give you the time you need for that of course, as well as any other comfort
breaks, and at some point lunch or a longer break to eat, if you would like. If you do
decline you need to speak with Mr. Sibley, I think our suggestion is that you go off camera
and on mute so that we don't have any possibility of overhearing what either one of you
are saying.

All right. With that said, do you have any questions about what we just went
over?

Ms. Bobb. No, sir.

Okay. Mr. Sibley, are you okay to proceed?

Mr. Sibley. Yes.

EXAMINATION

BY

Q  All right. So the first thing we'll show you is what we have as Exhibit 1. It's a subpoena that we issued to you, or the Select Committee issued to you in March of this year.

A  Okay.

Q  Zoom out just a bit. Okay. Does that look like a copy of the subpoena that you received from the Select Committee earlier this year, Ms. Bobb?

A  It does. I don't have my copy in front of me, but it looks like it's probably the exact same thing.

Q  Okay. And part of this subpoena required you to produce documents and information including electronically stored information that's requested on the schedule of the subpoena.

Did you search for information to provide in response to this request in the scheduled subpoena?

A  Yes.
Q And have you produced to the Select Committee all documents and communications in your possession, custody or control that are responsive to the request and the subpoena, and that includes anything that you would have logged on a privilege log?

A To the best of my knowledge, yes.

Q Okay.

A What I was aware of and what I could find on my computer or with my lawyer.

Q All right. And to the best of your knowledge, you are not withholding anything, meaning you didn't turn it over or didn't include an entry for it on your privileged log, correct?

A That's correct.

Q All right. We have one email address and we'll look at that. I believe you produced documents related to that, some combination of your name, and an email address.

Did you use any other personal email accounts, Google, email, Yahoo --

A No.

Q -- anything at all that might include documents relevant to the request?

And the time period I generally specify for these purposes would be roughly October of 2020 through January of 2021.

A No. Not intentionally. And if I did, I would have corrected it and put it back on that email chain.

Q Okay.

A But I do not think there's any other emails out there.

Q And did you have -- I understand you worked for OAN for a period of time,
including that period that I just mentioned.

Yeah.

Did you have an email account through them that would have had any potentially responsive documents?

I did have an email account for them, but I was not doing any work for OAN on these efforts, and so I tried very hard to keep those separate. There may have been a couple occasions where, you know, I made that mistake, but I did -- as best I could, I kept them separate. And in the search I also searched my OAN email to see if something has spilled over. And I believe I have turned everything over.

Excellent. And the email account that I mentioned earlier, the personal one you had or that you used, it was [redacted] at [redacted] right? That's the email address that you primarily used?

That's correct.

Okay. Did you have that email account -- was that through a consulting entity or some kind of entity that you set up?

It was an entity that I was going to set up before I started working for OAN. And then I worked for OAN, so I never put it together, but I kept all the email.

So was that email address specifically set up for your work related to the election of Mr. Giuliani?

No. It existed prior to that.

In that period that we talked about, that October 2020 roughly through January 2021, how many cell phones do you remember using?

One.

And is that the cell phone that is associated with the number with area code if I'm not mistaken?
A That is correct.

Q Okay. And did you search that phone for responsive information and documents?

A Yes.

Q Did you ever get a campaign-issued or Giuliani-issued phone during that period?

A No.

Q Did you use any messaging applications like Signal, Telegram, WhatsApp or Facebook Messenger during that period?

A Yes. Definitely Signal. I don’t think WhatsApp. I think Signal is the only -- I think just Signal.

Q And I understand there are some messages that are logged on the privilege log. Did you look through Signal to provide or search for information responsive to the subpoena?

A Yes. The messages that I logged were from Signal.

Q Did you keep any handwritten or electronic notes during that period, work documents, scraps of paper or journals, anything like that at all?

A To the extent that I did, it would have been attorney work product, and I turned everything over to my lawyer.

Q Okay. Any follow-up on that? Very good. Then, if you don’t mind, we can get started after that period by summarizing your professional background leading up to your work with Mr. Giuliani related to the election.

A Sure. Right out of law -- so I graduated law school in 2008, I think. Passed the bar in the smart end of 2008. Did a very brief stint in juvenile dependency work while I was waiting to join the Marine Corps? You know, there’s a waiting period. So I
did that probably six months.

Then I went to officer candidate school, the basic school, Naval Justice School. I was an attorney at Quantico, judge advocate at Quantico. Then I deployed with Second Marine Division to Afghanistan for a tour, came back from Afghanistan, was a criminal defense attorney in the Marine Corps for the year or so before I got out. Went home to San Diego, worked at the law firm Higgs Fletcher and Mack for probably somewhere between three and four years, and went back into the Marine Corps after that. I mobilized as a reservist in Stuttgart, Germany. I lived there a year and a half working on military issues and operations. And then I -- when I was done with that, I went to Washington, D.C., where I got my LLM at Georgetown in national security law. And from there, I joined the Trump Administration. And then from the Trump Administration, I went to OAN.

Q The Trump Administration, are you talking about your period at DHS, Homeland Security?

A Correct. I was a political appointee at DHS.

Q What was your role specifically?

A I was the Executive Secretary at the Department of Homeland Security. And then I had a very brief stint as the Executive Director of Policy at Customs and Border Protection, but the vast -- that was at the very, very tail end. Most of my time was as the executive secretary.

Q What was your day-to-day like as executive secretary, what roles and responsibilities?

A I was responsible for the information flow throughout the department, and primarily what was going to the Secretary, making sure that the information had got to the Secretary, had cleared all of the people that needed to see it, the policymakers, the
lawyers and all that.

I had a staff of probably 50 people, plus the executive secretaries at the components, like at CDP, ICE, CIS, all, you know, all of the DHS components. And we just made sure that the Secretary was getting the best, most accurate information.

Q And who was the secretary at that time?
A I served under Kirstjen Nielsen, Kevin McAleenan and Ed Chuckles (ph).

Q And after that, you've mentioned a brief stint at CBP. After CBP did you go and work with Mr. Giuliani?
A No. After CBP that was -- I left -- I left from CBP. That was when I left the Administration in like February 2020. And then I joined OAN a couple months after that. And so I joined -- I started working for OAN, I think my first day was June 1, something like that, 2020. And I did not work with Rudy until mid November -- well, early-to-mid November 2020. So it was after the election that I started working with him.

Q Do you remember a date when you started working with him roughly?
A It would have been about November 15-ish, something like that.

Q So after the election was called, at least by the Associated Press?
A Correct.
Q And how did you connect with Mr. Giuliani, start working for him?
A -- as a reporter, and then television interviews with him. And then when I saw that he was taking up, you know, the election question, I just reached out to him and said, hey, do you need help. I'll volunteer my time to help on your legal team. He needed help.

Q And was your outreach specifically related to your potential role as an attorney --
A Yeah.

Q -- or was it related to like a media or a --

A No.

Q -- PR aspect?

A Without the lawyer there was this -- we were very specific that any work that I would do with him would be subject to attorney-client privilege. He didn't want to record it. I would have had to get -- because you don't want attorneys going and reporting everything on the news.

So he was like I need help. I'll let you help me, but you to have to abide by your ethical obligations as a lawyer. And to the extent there's a story in this, you know, you have to get permission before you share it.

I was fine with that. I talked to the network about it. The network was fine with that, and that was it.

Q And the network being OAN?

A Yes.

Q So you stayed on with OAN technically?

A Yeah. Yes. My time was very short -- well, I mean, my time on this issue with Rudy was very short. It was from like mid November till roughly January 6.

Q Did you have to take a leave of absence from OAN, any kind of formal separation in order to do this?

A No. There was no formal separation. And I did still -- to the extent that I could, I was still reporting on other topics. Or if I talked about election integrity, it wasn't any privileged information, but I -- I continued reporting.

Q And when you went to the campaign based -- in your understanding were you representing President Trump in his capacity as a candidate, the organization,
meaning the campaign itself, Mr. Trump personally, or some combination thereof?

A I signed a nondisclosure agreement with the Trump campaign. So I would have worked for the Trump campaign.

Q And did you also receive an engagement letter or was it just that NDA that you signed with the campaign?

A The NDA. To my recollection, it was just the NDA.

Q So when you came in in that mid-November time frame, what was your role?

A As a lawyer.

Q Who were the other people who were also on the team you joined?

A Well, to the -- I'm not sure, like how much detail I can get into, but your -- most of the people are public, so like Jenna Ellis, Boris Epshteyn, you know, Rudy Giuliani. I mean, those were the main lawyers working on it.

Q And I assume, but I don't want to assume that you reported to Mr. Giuliani; is that right?

A Correct.

Q Is there anybody else you reported to?

A I wouldn't say reported to. I mean, I worked with other people. I worked with Boris. I worked with Jenna. But I wouldn't say that I reported to them.

Q Okay. So no strict hierarchy beyond kind of reporting to Mr. Giuliani and I assume ultimately the candidate himself?

A Correct. I never -- I mean, I didn't even know President Trump at the time. I did not report to him certainly.

Q Okay. And your role as lawyer, did you have a certain portfolio? I mean, there were a number of states at issue, and we'll get through some of them, but were you looking at anything particularly?
A: I'm a little -- I'm not sure how much detail I can get into without breaking my privilege, but I think what's publicly out there is I worked on Arizona, Michigan, and to a small extent New Mexico.

Q: Okay. And I was going to say, so Mr. Giuliani has been deposed in coordination or in association with the lawsuit that's pending in Colorado. And he said, and I'll just read that for you if it's helpful, he said that you, Ms. Bobb, came over to the campaign and offered to help us. She, by process of elimination, gathered a lot of information about Arizona, Michigan, I don't know about Georgia, but she eventually got involved in Georgia.

Is that accurate insofar as --

A: Yeah. I would not -- I did get involved in Georgia but not until later. And that was probably more from a reporting perspective, but yeah. I mean, he's not wrong.

Q: And Mr. Giuliani also mentioned the same deposition that you had a role, at least some role with Nevada, looking into issues with Nevada; is that right?

A: Yeah. That's probably fair to say.

Q: So in my role here, I'll just offer this to you, I'm a senior investigative counsel. So there's an investigative component to it. There's a lawyer component to it, and they are very much intertwined, but could you explain what your role was? I mean, did you have investigative responsibilities or were you really just offering legal advice to the campaign?

A: No, I was investigating.

Q: Who else on the team was also investigating?

A: I'm a little bit nervous that this is getting into attorney-client privilege because to what extent am I required to disclose what the legal team was doing.

Q: Okay.
Mr. Sibley. Christina, I don't think it's a problem to identify members of the team, particularly those that are on the privilege log already as being disclosed, because there may be communications with them that we have privilege. So their identities are already out there.

Ms. Bobb. Okay.

Mr. Sibley. I think you can identify, you know, members of the legal team and members of, you know, anyone that was employed as an investigator or consulting expert or something like that.

Ms. Bobb. Years ago, I would say I primarily did a lot of the investigating. Boris and Jenna both did work. They also were primarily, you know, media focused. They were very upfront doing television and interviews. Katherine Friess was part of the -- she was part of the team. She did some work that I'm sure you guys are aware of. I'm trying to think if there's anybody. Feel free to help me.

BY [redacted]

Q Yeah, of course. What about Bernie Kerik?

A Oh, yeah, of course. Yeah.

Q What was his role?

A I mean, he was investigating. We were all investigating, right? Like it all happened really fast. It wasn't like we created an org chart, you know. We just all kind of chipped in how we could and were looking for information but, yeah, Bernie Kerik, you know.

Phil Waldron. Sorry. I was trying to think of the lawyers but, yeah, there were a handful of experts too. Phil Waldron was the primary expert I think that we relied on.

Q And I'll just stop you there. With respect to Mr. Waldron specifically, was he engaged as an expert by the campaign, so far as you know?
A: As far as I know. I don’t know like what type of agreements they had or whatever, but from an operational perspective, yeah, he was an expert.

Q: And his focus I understand was on voting machines and analysis, forensic analysis; is that accurate?

A: A lot of that, but that wasn’t how we used him. I mean, he did do that but he, you know, he worked for a lot of different like groups that were looking into this. We were primarily using him for numbers and data analysis, like the New York Times Edison data when numbers came out on election night and, you know, the analysis of the actual results.

We were not particularly focused on machines or the actual mechanics of the election. We were looking pretty strictly at the numbers.

Q: Okay. Is it your understanding that to the extent that Mr. Waldron did that work related to machines, he was doing that with Sidney Powell?

A: Definite -- I mean, yes. I wasn’t particular -- I mean, I kind of glossed past that a little bit, but I wasn’t very deeply involved in what they were doing but, yeah, I would say Sidney I think he’s done -- I think. This is my understanding, I don’t know, but I think he may have done some work for Mike Lendell or possibly Patrick Byrne. I don’t know, but --

Q: So on those names you just mentioned, Ms. Powell, Mr. Lendell, Mr. Byrne, were they on the Rudy legal team, to your knowledge?

A: No. The only reason I hesitate is because I think initially there was some discussion that Sidney may have or may have not been part of it. I don’t actually know, but the others were not.

Q: Okay. And I know there’s a release I believe on November 22nd specifically about Ms. Powell. I think Mr. Giuliani said something to the effect of she’s working on
her own. She's not part of this team.

A Yeah, I think -- sorry. I didn't mean to interrupt you.

Q No. I was just going to say, so is it your understanding that at least by that point Ms. Powell was not a part of the Rudy Giuliani legal team for the campaign?

A So initially I think it was a gray area. And then he made it very clear at one point.

Q What about Joe DiGenova and Victoria Toensing?

A Yes. I'm sorry. They were working with Rudy as well.

Q As part of the legal team?

A Yes.

Q And like I said, some of these names we'll get back to, but just to go through the list while we are doing it, what about Cleta Mitchell?

A I didn't work her. I don't think I had any communication with her but, yes, I've heard her name, you know, in the environment.

Q What did you understand her role to be?

A She was working Georgia. Like I said, I didn't really work Georgia initially. So I don't know that, but I -- I think she had something to do with Georgia.

Q And what about Ken -- I am going to mispronounce his name, Chesebro, Chessbro?

A Yeah. I mean, I think he's doing cases now. I had no communication with him whatsoever at the time, and I have no knowledge of his involvement, at least not -- I mean, I know he's done stuff recently, but at the time frame you are talking about, I wasn't even aware of his name.

Q What about John Eastman, what was his role?

A He -- I mean, yeah, he provided counsel.
Q When do you remember -- was he already part of the team when you got there in November 15-ish?

A I don't think so. I think he came after.

Q Roughly when? We'll go through some documents that might help this, but roughly when do you remember him coming onto the scene?

A I'm sorry. Can you repeat that?

Q Yeah, of course. I said we are going to go over some documents that may help on this later, but at this point roughly when do you remember Mr. Eastman coming onto the scene and joining the Giuliani team?

A Maybe Decemberish. I don't have a good recollection. I'm trying to answer your questions to the best of my recollection.

Q Okay. Very helpful. And I'll use as a guidepost the Electoral College certification date, December 14.

Do you think he was there, meaning Mr. Eastman was part of the team before that? Or did you think Mr. Eastman came on after that?

A So when I think of Eastman, I think when he was physically in DC. He may have been communicating with the team that I'm not aware of before he was physically in Washington, D.C. So I don't -- to that extent, I don't know. But from my experience and like interaction with him, I think it was either right around that time or shortly after, but I didn't really communicate with him until he was physically in Washington.

Q Okay. And I understand he came to Washington, and I think we'll see this, but either very late December or early January?

A Yeah.

Q Does that line up?

A Yeah.
Q: Okay. So just functionally, what was the process like in the campaign for receiving allegations about election fraud irregularities?

A: So I -- I mean, I didn't work the campaign, right. I was just campaign legal. And I would receive the information from the operations team.

Q: Who was the operations team as you understood it?

A: I'm trying to think of who I got the affidavit from, probably Mike Roman, I don't know. See, I was new. I didn't actually work the campaign, so I didn't know all of the people. And so I would either ask Boris or Jenna or somebody like how do I get this information.

So I was very new. I didn't know anybody there. And so I have very limited information about that, but I remember -- I remember interacting a little bit with Mike Roman at that point, but...

Q: And so tell us about that. How would he get you information and what kind of information would he get you?

A: Is this not attorney work product? I don't like -- I mean, this was my research and investigation as a lawyer?

Q: Okay. But just the process generally, without getting into your mental -- your thoughts, any conclusions you made, anything like that, just the process of getting information?

A: Like how did I get --

Q: Let me ask I guess a slightly different question. Was there an intake mechanism? I mean if somebody called from Nebraska and said I want to report that I saw X, Y, Z happen at the polling place, how does that information make it all the way up to you?

A: That's a great question. And I would love for you to ask the leaders at the
RNC to explain that, because I don't think there's actually a good process for that. So I don't know, but --

Q Okay.

A That's actually a really great question that I would love to know the answer to.

Q So I guess the stuff that you were looking at, without necessarily getting in again to your conclusions or thoughts about it, but was it handed to you by somebody saying here's your portfolio; go look at this stuff?

A Yes. Something like that. It would have been -- like the only thing I can think of is like affidavits, like for cases or whatever. I probably got like a Google drive or something like that, but that was it. I mean, I didn't have a lot to work with, just being frank, and had to go do a lot of it myself.

Q Okay. And to do it yourself, I mean, would you go out and talk to people, I mean, do interviews?

A Some extent. I mean, I don't want to get too much into my work product of like what I did and how I did it but -- but, yes, I did a lot of the legwork, a lot of the legwork myself. I think a lot of that is in domain public.

You know, a lot of it has come from the Arizona Senate, you know. Everything that you can see from my interactions with them, that's all been produced but --

Q Okay.

A Yeah. I mean, I did it myself.

Q And, I mean, obviously there's a lot of litigation out there at the time. Affidavits are filed with litigation. The campaign has to get those affidavits somehow. So did you have a role in getting the affidavits that you just mentioned?

A No.
Q  Who did that?
A  I don't know. I wasn't part of the campaign. But like if I needed an
affidavit, like, because I wasn't local counsel, and I never actually physically needed to use
the affidavits myself, so it was never an issue. But if I needed an affidavit for something,
I probably would have contacted Mike Herman.

Q  Okay. And I'm a little bit loose in my language here, and I apologize.
When I say campaign, I think of kind of what's left over at that period, understanding that
the election had already been run. So you have got the campaign Matt Morgan, Justin
Clark, the whole team that they had set up and continued through, along with the legal
team that Mr. Giuliani's running.
So to the extent there's a difference, can you explain that difference to me just so
I'm not using it too casually in my language?

A  Right. I mean, it was just a difference of, you know, will to investigate.
That's it. I mean, it was all the same. We are all on the same team. It was just who
wanted to do the work and who didn't want to do it.

Q  Okay. And who were the people that you thought didn't want to do the
work?
A  I don't know them. Everybody that I was working with was there to work.
So Boris, Jenna, Bernie, Rudy, like we were all doing the work. And like they would talk
to the people. I don't know who they are, I wasn't part of it beforehand, so, I mean, I
don't know who they are.

Q  Okay. So did you have any interactions, without getting into what they
were necessarily, but did you have interactions with Justin Clark?
A  No.

Q  You don't remember any?
None. I personally -- I don't -- to my knowledge sitting here today, I don't think I've ever had any interaction with Justin Clark.

What about Matt Morgan, did you ever interact with him?

Very briefly, like for the purpose of the NDA, but it was all administrative, nothing actually like substantive on the work.

How about Alex Cannon?

At that time, no.

You say at that time. Have you interacted with him since January 20, 2021?

Yes.

Unrelated to the events we are talking about today, January 6 and the lead up?

Yes. Correct.

Okay. What about they had a research team that they used, meaning the campaign, Zach Parkinson; there's others who looked into some of the claims of fraud. Did you ever work with Mr. Parkinson or anybody on the research team?

Never heard of him.

How about Tim Murtaugh and Jason Miller, did you work with them?

I mean, of course I've heard of them. Yeah. Jason Miller did the media, a lot of the media stuff around information that we would collect. He would distribute it, but yeah.

Do you remember Jason Miller ever coming to different conclusions than what you and your team were coming to?

I don't know. I don't have it, like, I personally don't have a specific recollection of giving him information that he like somehow said something else, but that also wasn't my role. You know, I was more of like doing the ground work. And the
com people and the messaging people, that was Boris and Jenna and Rudy. That would have been their thing.

Q I asked you about affidavits and collecting affidavits for purposes of litigation or otherwise. It sounds like that wasn’t part of your ordinary job, correct?

A Correct. No.

Q Okay.

A In Washington, D.C., there was -- no one in DC was going to help me get an affidavit, so it had to be people that were like out in actual locations.

Q Okay. So if you could just tell us though then, like what were you doing? On a day to day, you go into the office; are you crunching numbers? Are you analyzing graphs? Are you interviewing people to test kind of the veracity of what’s coming in?

A Yeah. All of that.

Q And did you work with anybody in particular to help you in your job, other than people who were working other states or different issues?

A I mean, not -- not -- the way you asked the question, I’m not sure. No, I don’t think so. You know, if you asked me how I worked with someone specifically, I might remember, but no. I felt like it -- it was me doing my stuff. And I worked with Rudy and the rest of the legal team, and that was it.

A Okay. There are a lot of different allegations of fraud and irregularities swirling at the time, some of which are still out there. I am just going to name one: Dead people voting, suitcases of ballots in Georgia, you know, confined folks who were voting and maybe not meeting the definition of confined. Did you find --

A (Inaudible) -- voters, ballot stuff, yeah, as well. There’s a lot of evidence of fraud out there.

Q So, I guess my question is did you have any one of those in particular that
you became the expert on for the team?

A We didn’t focus it that way. We focused on states. So, yeah, I looked into whether there were dead people voting in Arizona, double voters, you know, vote buying, ballot harvesting, all of that for like Arizona, Michigan, a little bit of New Mexico, a little bit of Nevada. I mean, yeah, I looked into all of it and found evidence of most of it.

Q And in Michigan what were the issues there that you recall working on?

A The biggest thing in Michigan that I was working on was Republicans being excluded from the process and not having a chance to meaningfully participate in the process, and having ballots counted outside of the view of conservatives, and Republicans being forcibly removed, and having questions because ballots coming from Republican districts were set aside and counted later but never counted, and were they discarded.

There was a lot of questions about the integrity of the account, the actual counting. You know, the Wade County clerk wouldn’t certify the candidates because the books never balanced. You know, it’s that procedural issues. There was a lot of -- I don’t want to call it -- there were lots of indicators of -- I don’t want to call it fraud, cheating, or shenanigans or problems with the way that the Michigan election was conducted and -- yeah.

Q Okay. And you’ve mentioned indicators, and specifically one of things you said was about observations. Are you talking about the allegations related to the TCF Center?

A That’s part of it.

Q Or are you talking about more than that?

A Well, I mean, it’s not just the TCF Center. Of course Detroit was the hub, but you have problems in Oakland County and Macomb County. There were problems in several counties. Antrim County was another one.
So there were problems in a lot of places but, yeah, the TCF Center was the one that, you know, had all the cameras and stuff with it, so...

Q: Did you travel to Michigan as a part of that?
A: No.

Q: I'm sorry. I didn't hear you, Ms. Bobb.
A: No, I did not.

Q: Did you travel -- you mentioned Arizona earlier. Did you go to Arizona?
A: No. Not that time.

Q: I see. Okay. I'm sorry to hear that.
A: That's okay.

Q: Okay. So as you made conclusions, again without necessarily getting into what the conclusions were, who would you pass them to? What was the next step in the process?

[Court reporter clarification.]

Ms. Bobb. Rudy.

Thank you. I'll try to do a better job on my end as well.

BY [ último negro ]

Q: And what was your understanding of what Rudy did with the information that you passed to him?
A: I mean, it depends on what it was. You know, like if there was indicator -- it depends. I mean, it depends on what it was. I could tell them information about what people were saying and hearing, and we would determine whether we needed to file a lawsuit, whether there was some other -- you know. We would do a legal analysis, like what do you do with this information.
Q Okay. Did you ever have any leads or tips where you were unable to find supporting evidence?

A Yeah. Yeah.

Q And what happened in those cases?

A I usually dropped it. Like why would I pursue something that I don't think happened?

Q And other than you, did you engage with any other fact checkers, you know, people whose job it was to sit and really dive into these issues?

A Yeah. I mean, not -- yes. I mean, not -- I wouldn't say from like the RNC or the campaign. I mean, that was primarily what I was doing, but yeah. I would talk to, you know, local GOP reps or grassroots efforts or local representatives. Yeah. I talked to a lot of people trying to get information.

Q You mentioned grassroots. Were any there grassroots groups or organizations in particular that you worked with?

A At the time, at the time I -- I mean, I can't give you like a specific name that -- no. But since then like, you know, there's a lot of effort. In my capacity as a journalist, there were a lot of grassroots efforts that came about like mid 2021 that I worked with for reporting, but not at the time frame you are looking at.

Q Okay. Yeah. And just to be clear for you, Ms. Bobb, we are not interested in the reporting aspects of what you did then or what you are doing now or in between.

A Okay.

Q But I appreciate you making that distinction for us. You mentioned not using the fact checkers or not relying on fact checkers from the existing campaign framework or from the RNC. Was that a deliberate decision not to use them?

A -- there even are fact checkers. Like, who are these fact checkers? I don't
know who they are. And I'm not trying to be snarky, but like do you have someone in
mind that you think did that job?

Q Yeah. One of the people I mentioned earlier, Mr. Parkinson?

A Oh, yeah. I don't know him. And, actually, you are the first person to tell
me that he existed as a fact checker. So maybe that would have been helpful. I don't
know.

Q Do you remember any discussions about using existing campaign staff or the
RNC as fact checkers for any of the allegations coming in?

A Do I remember -- no. But it was after the election, so the campaign staff
was, like, gone. The only people that were left were people who wanted to volunteer
their time to do it because the campaign was over.

So to the extent the campaign had fact checkers, I don't know that they existed
after November 3.

Q Okay.

A So I don't know. They may have. They may have not. But from what I
saw, it looked like the campaign pretty much dissolved on November 4th.

Q We'll get to more of this later, but in your role, other than what we have
been talking about already, did you engage in outreach to state legislators?

A Yes.

Q How about members of Congress?

A I don't know, actually.

Q And when I say members of Congress, I should also say their staff, so..?

A Possibly. I don't have a specific recollection of anybody that I reached out
to, but I could have.

I'll pause there to see if anybody has any questions about what we
1 have just gone over.

2 Nothing for me.

3 We have just covered a lot, so bear with me just a moment, Ms. Bobb.

4 Ms. Bobb. Sure.
Q  Do you know why Mr. Trump, candidate Trump wanted Mr. Giuliani to take
over the legal effort as opposed to continuing to use Mr. Clark or Mr. Morgan or anybody
else that was already affiliated with the campaign?
A  I have no idea.
Q  And just to go back to some of the names on the team, my understanding, it
may not be accurate, which is why I'm asking you, but my understanding is that Mr. Kerik,
Bernie Kerik has sometimes been described as kind a lead investigator for the
post-election legal team efforts?
Would you agree with that characterization?
A  I think that's fair. I mean, Rudy and Bernie, they are -- like they rebuilt New
York together after 9-11. So they are very close. So, yeah, I mean, they were a pretty
tight team.
Q  And earlier you mentioned that after you made a conclusion about whether
something had merit, didn't have merit, needed further investigation, whatever it was,
you might report that to Mr. Giuliani. Would you also report things to Mr. Kerik?
A  I mean, I wouldn't say that I reported it as in like I owed -- like from a
subordinate to a superior, although I certainly respect and have a lot of admiration for
Bernie Kerik and his career, but it wasn't really that type of environment. It was
more -- I mean, I would give information to anybody who wanted it, you know. Like I
wasn't -- I wasn't trying to withhold anything or be secretive about anything, so --
Q  You said Mr. Kerik and Mr. Giuliani were a close team. Do you have any
reason to believe that Mr. Kerik wasn't aware of what you were doing, the conclusions
you were making?
A I mean, it's quite possible. We -- we didn't -- especially remember

So I wasn't sending him an email every day telling him what I was doing. So, yeah, it's quite possible he didn't know what I was doing. But I think anything big, like talking to a state legislator who was interested in hearing the information, he would certainly know about that because there was a hearing that was held. But, no, I think it's very likely that he did not know everything I was doing.

Q And another name I neglected to mention was Russ Ramsland. Do you know who that is?

Yeah. I know who he is.

Was he part of the team, the legal team officially?

A I don't know. I don't know. At the time I saw him as like Phil's partner, or like Phil and Russ were doing stuff together. I think they were working on Antrim stuff, I think.

So I don't know the official relationship but, yeah, it's possible that he had a formal relationship with the campaign.

Q You don't know for sure though?

A No, I don't know.

Q Just to be clear. Sounds like you didn't, but did you have any formal or informal role working for the campaign before the election?

A No.

Q And when you joined the post-election efforts, do you know if the campaign -- or excuse me, the legal team had reached any conclusions about the possibility -- or excuse me, the existence of fraud sufficient to change the outcome?

Again this is the beginning when you joined.

A Yeah. I mean, I don't know what you mean by reached conclusions but,
yeah, we certainly all suspected it. I thought there was plenty of indicators, circumstantial evidence, reasons to believe that the election was not conducted properly. And I think we all believed that, which is why we were willing to volunteer our time to investigate.

Q. That's exactly what I'm getting at. And I think your answer anticipated some of what my next question is going to be, is you are a lawyer, understand the different kinds of burdens of proof, so to speak, you know, civil burdens of proof, preponderance, reasonable suspicion in a criminal context.

Where were things, I mean, at that point when you joined, was it just allegations that you had and were investigating or were there actual conclusions this happened?

A. Well, I -- so, you know, there's different types of evidence, right. You have direct evidence. You have circumstantial evidence. You have physical evidence. And I think at the time I would say the circumstantial evidence was -- the way the election was conducted was suspicious.

The fact that Trump had such a blowout that on the day of election and into the election night, and then suddenly, you know, five or six states stopped counting. And suddenly then they all -- it was weird. And everyone says, oh, it was COVID. It was COVID. Okay. Maybe it was COVID, but it was very weird. It was very suspicious.

So that's circumstantial evidence that something was amiss, right. It's not -- you know, maybe probably not beyond a reasonable doubt, but there's something there. I would say that that is evidence.

I think there's evidence of the fact that Republicans from the time the polls opened were complaining that they didn't have the same access as Democrats did. Like there were complaints about that the morning of November 3.

So that's evidence that there's, you know, something wrong happening, or that
there's -- again I don't want to use the word fraud, because then you are going to tell me that, you know, define it and all that stuff and, like, I don't want to use a legal term. But there's indicators of bad activity.

And I think that happened in multiple states throughout election day into election night, the fact that they stopped. I think there's plenty of evidence on election day to say, hey, there could be a problem here. It's worth investigating. And I think that's where we were at.

Q Okay. So you mentioned like indicators and problems that could be worth investigating. That's where things were at though. Like there's a need for follow up as opposed to rock-solid conclusions, at least at the point when you joined in mid November?

Nobody has said this absolutely happened yet. These are allegations that we need to look into; is that fair?

A I mean, I think it's fair. I -- I -- because I know at the time everyone was saying, oh, there's fraud; there's fraud; there's fraud. And I don't want to say that there wasn't fraud. That's not the point that I'm trying to make. The point I'm trying to make was there was plenty of evidence to be concerned about fraud.

Q Okay.

A Now, we didn't have a case put together on November 4th, because it was November 4th. So was there fraud on November 4th. Possibly. That's why I volunteered and I wanted to look into it because I was concerned about the integrity of my vote, of the country. I think that's why we all got involved.

So I don't want you to take my statement and say Christina Bobb said that in the beginning the legal team knew there was no fraud. That's not what I'm saying. I'm saying there was plenty of reason to believe there could be fraud. And to the extent
that people were saying there was fraud, you know, I would probably stand by their statement.

If you want me to prove it in a court of law, that's a different standard, right. So I -- you know, I don't know. It's not as black and white. I'm not trying to be rude. It's not as black and white as the question, and so I can't say.

Q Yeah. No. And I am not going to put any words into your mouth, Ms. Bobb.

A Right. If you don't, the Washington Post will or Daily Beast or somebody will. So I just want to make it very clear. Forgive me for being a little informal, trying to play a little bit, but, you know, I just want to make sure that my words are not used to say, oh, President Trump had no basis to say there was fraud. That's not my point at all.

Q No, I understand. And I totally get it. I mean, you have an investigation. You start with at one point the reason you investigate is to look into things, right?

A Correct.

Q That's the reason for it. So I'm just trying to understand where in that spectrum of investigation to conclusion things were at least so far as you knew when you started. It sounds like they were in the we-need-to-investigate phase but, again, I don't want to put words into your mouth.

A Yeah. I mean, I think it depends on -- you know, it was -- it was triage, right. It was the day after an election. You have less than two months to kind of solve of your case. It's not like you have the typical two years of litigation to put your case together and make it all nice and neat. So it was not nice and neat. And I don't think anybody would say that it was.

Now, if you are asking me was there conclusive proof of Republicans being excluded from the process, yeah, I think there was. On November 4th --
3rd, I think there was conclusive proof that Republicans were excluded from the process in some states in some areas.

Can I say there is conclusive proof of -- like I don't know the numbers very well? I'm not a numbers person, so that's not my area. So personally you are asking me, I don't know. But there were certain things that I think were provable. There were certain things that I think were probably not provable at that point. And then there were things that were open questions. So I don't know.

Q Okay. No, that's helpful. I appreciate that. Part of this, and part of what happened after the election, or there were press conferences, you know. Mr. Giuliani went out, gave press conferences. Other members of the legal team gave press conferences.

What was your understanding of the need to do press conferences about this, the reason behind it?

A I don't know. I never did one. You'd have to ask them.

Q We talked a little bit about how allegations of fraud irregularities, whatever it is that you want to call them came in; but once they come in, was there a central place for tracking? Did you guys have like a database of information where this stuff was stored?

A You would have to ask the RNC or the campaign. I don't know. I had nothing to do with that.

Q But not to your knowledge there wasn't a central place where you logged in to look at all the --

A No.

Q -- the data that you had, for example?

A No. And it's possible it existed and I didn't have access to it. You know, I
was a newbie. Like I wasn't part of the original team. So I can't say it didn't exist. I didn't know about it.

Q And if you know, what steps needed to be taken just from a process perspective before a claim about the election or something that had happened in the election appeared in a public statement or in a court filing?

A I have no idea. I mean, I was the media at that point and I, you know, I don't know, so...

Q When we talked about this kind of continuum of proof and standards of proof, was there any certain level that a claim had to reach before the team felt it could be used in a court filing or affidavit?

A Well, sure. I mean, we all -- we are lawyers. We have ethical standards, right. You are not going to put junk up into a court. So whether it was an affidavit, you know, someone swearing that this is what they witnessed or what the saw, I mean, it's the proof of, you know, any trial lawyer.

Q Okay. So if a witness came with an affidavit and said I saw this, for example, happen at the TCF Center in Detroit; was there any requirement that you are aware of to verify the information in that affidavit, or was the fact of the affidavit sufficient for the team?

A We would verify that the person was actually there, you know, it wasn't some rando on the street, that they were actually either registered with the GOP as an observer or, yeah, you would verify that the person is who they say that they are. You get all that information.

I do think either the RNC or the Trump campaign had someone doing that. Like I said, I didn't gather the affidavits, so I don't know, but I do think that that process took place. But certainly you are not just going to take an affidavit from anybody and assume
it's legitimate.

Q: Were you counsel to any lawsuits that were filed after the election?
A: Definitely not counsel of record. No.

Q: I should have said of record. I'm sorry. That's what I meant, not counsel of record to any lawsuits?
A: No.

Q: In your role, though, did you assist in the litigation? And I don't want to get into work product, but did you participate in the lawsuits that were happening in Michigan or Arizona, some of the states you mentioned earlier?
A: Probably. I -- to be honest, I was focusing more on the state legislators, but probably, yeah. Or I would help with, you know, the information that I had or something like that but, you know, I don't have a specific recollection of that, but probably yes.

Q: Now, as that litigation proceeded, I think none of it, maybe one case was successful, 60 out of 61 challenges, not all of which came from the Trump campaign or the legal team. How did that affect what you were working on, and how did it affect the messaging coming out of the legal team with respect to those claims of fraud, if they had been litigated?
A: I had nothing to do with the messaging. You would have to talk to Rudy or Jenna or somebody that did the messaging. And I certainly -- I don't know, you are saying 61 cases; there certainly were not 61 Trump cases. There were other parties or whatever, and I have no control or anything over what other parties do.

So, to that extent, it doesn't affect anything. I mean, I don't know that it had an effect on me personally.

Q: What about like, I mean, you mentioned the TCF Center and what was
happening in Detroit. There was a case from I believe mid November in Detroit. It was
Chief Judge Kenny who decided to call Constantino versus Detroit.

Are you familiar with that case?

A I am not.

Q Okay. In that, there are multiple affidavits submitted, but it talked about
fraud at the TCF Center, about observing -- excuse me, and Mellissa Carone was one of
the affiants who submitted an affidavit for that. The judge in that case, I'll represent to
you, he looked at some of that and analyzed the affidavits that were submitted, and
ultimately determined that the plaintiff's affidavits did not have sufficient merit to
warrant any kind of relief.

So I almost -- Ms. Carone was ultimately a witness in several meetings with state
legislatures. So I guess my question after all of that is how did that case where a judge is
saying, you know, I don't find sufficient merit, sufficient evidence to warrant relief on
some of these issues weigh in to any decisions that you or the team made on those issues
or with respect to witnesses like Ms. Carone?

A For me personally, it had no effect on me. Like I wasn't even aware of the
case until you just told me about it. So if it impacted anybody else, you'll have to ask
them.

Q Was there a person who was tracking all of the litigation that you are
familiar with on Mr. Giuliani's --

A -- were at the Trump campaign or something like that. That was not my
role.

Q Do you mind starting over, just because I think there was a little bit of over
talk there.

A I said probably at the RNC or maybe at the Trump campaign, but it was not
my role, so I don't know.

Q And do you know anybody on Mr. Giuliani's team who had that role?
A No. I mean, I don't know. I mean, it was like four -- right after the election, you know what I mean. We had eight weeks to work together. So, no, we weren't doing anything specific like that where they would -- I don't think. But a lot of the election tracking -- I mean, if you are only going to track a lawsuit for eight weeks, you are going to get the complaint, you know. Like what else happened after that.

So, no, we -- we did not have enough time to need something like that. And again, this is all to my knowledge. There could have been somebody doing it that I am not aware of.

Q Absolutely. Fair point, Ms. Bobb.

So it's been reported that some of the lawsuits that Mr. Giuliani was responsible for filing were partially based on getting of course favorable court rulings, but also based on convincing the media and the public about some of these alleged improprieties, fraud, whatever you want to call them.

Were you aware of the media strategy that Mr. Giuliani or his team or others on the team employed?
A No. I had nothing to do with the media aspect of it.

Q Was that intentional because of your co-existing role or background role with OAN?
A Probably. I mean, nothing formal, but I was trying to be respectful of the access that I had. And also I was not invited to be on the media team. So, you know, I'm not going to force myself into that. I was there for a purpose, and it wasn't for media, so...

Q You mentioned having a perhaps larger role, again I don't want to put words
in your mouth, but at least a role with respect to state legislatures and --

A  Yeah.

Q  -- the aftermath of the election. Was that something that -- was that part of your role when you started November 15th, or is that something that added later on?

A  That -- I mean, added later on, probably like three days later, you know. It wasn't like -- everything happened so fast. But did I contact the state legislature on my first day, probably not.

Q  So what was your role? What was the job that you had with respect to state legislatures? How would you describe it?

A  We were assigned a duty. I was just trying to figure it out. So I just picked up the phone and started calling them, asking them what they thought happened in their state, what they wanted to be -- like what information do you need. You know, I don't want to get into too much because it's my work product, but I just picked up the phone. I wasn't assigned, you know. I just picked up the phone and started calling.

Q  What was the end game, so to speak, with respect to state legislatures?

A  There is no end game. I mean, the point is making sure that our elections are safe and secure to the extent that state legislatures are responsible for that, according to the Constitution. What is it that they want?

I think a lot of the discussion is still happening, whether it's writing new legislation, whether it's considering -- you know, Wisconsin is still doing their investigation. They had one report come out, I want to say less than two months ago, a month ago, and like they are still investigating. So I don't think there's an end game.

I think the whole purpose is to make sure that everybody gets one vote per person, that you don't have people dumping, you know, 25 ballots in and committing fraud.
Q And when you started, was it your understanding that state legislatures had a role in correcting, changing, affecting the outcome as certified by other parts of state government?

A I'm sorry. I don't understand the question.

Q Okay. Fair enough. Thank you for asking for clarification.

I use the word "end game" or the phrase end game, and maybe that's not the right phrase to use, but -- but did you think that state legislatures could do something to affect the outcome of the election, or was it just a matter of informing them about what was happening?

A I don't know. I think -- according to the U.S. Constitution, state legislatures are responsible for their elections and for their electors. And I do think state legislators have authority over their elections. I do think there are things that they could do. It's up to them certainly what they want to do but, yes, I believe in the United States Constitution. It vests the authority with state legislatures.

Q Was that your understanding when you joined the legal team around November 15th, or is that something that you had to be kind of read into or that you learned after joining?

A I mean, I think it's Article 2, Section 1, Clause 2, I think, or it's something like that for the electors clause. And, like, I read it. And you read that and it's like I don't need to be read into the U.S. Constitution. I can read it in black and white and make my own decision on it. And when I read it, it says power to select electors. That's the state legislatures. And so I think it vests the state legislatures.

Q Okay. Sure. But I guess one, what we'll see as we walk through some of the documents that you provided and otherwise, we see requests ultimately as we approach January 6 that state legislatures do something, either appoint their own set of
electors, or delay, seek a delay in certification so they can continue to look into it.

Was that your understanding at the beginning in November when you joined, that there may be that aspect, that state legislatures appoint their own electors, for example?

A  I don't think anybody -- you are saying appoint their own electors. I don't think that was ever a thing. I mean, I know that there's the whole alternative slate of electors that came up, just like the replica of I guess 1960 or whatever, like they were trying to do the same thing, but I don't -- the request was that the state legislators take a closer look at their election and make a decision.

And it's always been up to the state legislators what they want to do with that. I don't think there was -- like, I mean, I guess I don't know. I guess the answer to -- short answer to your question is I don't know.

There was no -- I didn't come in going, hey, you know what, I'm going to tell the state legislators that they need to reverse the election. No. I didn't join the legal team thinking that but, I mean, is it possible that the state legislators have concerns like we see a lot in Wisconsin right now, that maybe the wrong slate of electors was sent or, you know, the election was certified improperly. It's certainly possible. Yeah.

Q  Okay. And we'll get into more of that later, but that's helpful. I appreciate that, Ms. Bobb.

I'll stop there to see if anybody has any questions before we move into the next topic.

Sure. So, good morning, Ms. Bobb. Earlier we were talking about sort of where in your view the sort of, you know, status of the case was when you joined in mid November. And and you talked about this spectrum starting with suspicions, you know, and on the other end of the spectrum is sort of building a case, you know, and proving a case that there are concerns of election irregularities.
By the end of your time working on Mr. Giuliani’s team, where would you say you were on that spectrum in terms of building evidence; and did that vary by state, and did it vary by the types of irregularities you were looking into?

Ms. Bobb. So, and I go back to what I said before, it depends on what you are looking at. Like if you are looking at were Republicans excluded from the process, we have I would say pretty conclusive proof that that happened on election night.

Sure.

Ms. Bobb. But that’s not the entire case, right. So there’s a spectrum, but there’s like spectrums within spectrums. And so it depends on what you are looking at.

Some stuff I think was pretty solid and conclusive. And then other stuff it was very much an open question and we were trying to investigate. And I think we are still there at some point. I’m sure you gentlemen have already concluded that the election was conducted properly. I personally, as I sit here, I don’t think that’s true. And I have open questions about it. And there are -- there’s a lot even more evidence has come out, you know, in the last year.

And Wisconsin did a very thorough investigation. I thought the Arizona audit was very thorough. And to me there’s more questions now than there was in November 2020.

So I think it’s very much an open question, and I have very serious concerns that there are problems with our election.

Sure. So, I mean, I’m just sort of thinking, you know, at the time you stopped, you know, where you thought that the status of things were, you know, where you stopped working with the Giuliani team. And you mentioned that it was kind of different, different places for different types of issues, you know.

By the time you stopped working on the Giuliani team, were there particular
issues or areas where you felt like you built a pretty good case?

Ms. Bobb. I don’t know. I think we have a pretty good case. Where if you are asking me by January 6, 2021, I think we had -- I think we had a lot of evidence. We have a lot more evidence now. And so the difference between what we had at that time, what we have now, I mean, I don’t remember exactly where that line is. So I don’t -- I mean, I don’t know, but I think -- I think there’s a lot of evidence that there was bad actors during our election.

I think there’s a lot of evidence that there were problems and possible fraud, possible cheating, possible ballot dumping, multiple votes from multiple people, ballot harvesting. I think voter manipulation seems to be a really significant problem. So, yeah, there’s a lot of evidence that, you know, I don’t think -- I don’t think it’s been resolved.

Understand. Do you have any follow up on that?

No.

BY

Q All right. So I do want to jump into the issue of Dominion voting machines. When did you first hear about issues related to Dominion voting machines?

A Same as everybody else, after the election.

Q Was it as a result of your work with the legal team or was it just in public reporting?

A Probably public reporting. I mean, Rudy wasn’t particularly interested in the machine stuff, from my recollection.

Q Do you know why?

A I mean, he’s a litigator. He wanted stuff that you can submit to court, that a jury can understand. And algorithms and all that stuff, it’s very difficult. So he
wanted affidavits from real people that were there that could talk about what they had
witnessed. And that's what we as Rudy's team focused on.

Q But since Dominion and Smartmatic did come up though at a press
conference, or at least one press conference, including the press conference that Mr.
Giuliani and others did at the RNC in mid November; do you remember that?

A Vaguely. I was not there. I wasn't present, you know. I didn't
participate.

Q And I'm going to show you a document to see if you recognize it. If you
could pull up Exhibit 4 please, I'll represent to you, Ms. Bobb, that this is a
document compiled by the campaign and some of the researchers on the campaign. It's
titled Dominion Voting Systems, Top Lines. And then it talks about some of the
allegations related to Dominion and Smartmatic.

And if you can zoom out just a little bit, we can scroll through this, but as you look
at it right now and what you see, do you recognize this document? Have you ever seen
it before?

A I don't recognize it. No.

Q Were you aware that the campaign did research -- or leftover campaign
personnel, to be more precise, did research into Dominion and Smartmatic when these
allegations started surfacing?

A Probably. Yeah. I mean, I know Colonel Waldron was interested in the
machines and looking at it. It wasn't something that I was particularly focused on but,
yeah, like I am aware -- to me, from where I sat, it was kind of like a background thing
that I think was happening, but I'm -- I don't recognize the document. I don't know if I
received it or not, but I don't think I've read it.

Q Without getting into any specifics, do you remember any discussions about
the research that the leftover campaign folks were doing into Dominion and Smartmatic
to -- yeah, debunking some of those claims that had come out?

A  I don't know.  I'm not -- I don't know.

Q  Any follow-up on that?  No?  Around this time, we are still in mid
November, there's a lot of talk, at least in the public realm about Dominion voting
systems.  And Mr. Ramsland, Russ Ramsland who we talked about earlier was on Lou
Dobbs and said that he had identified over 3,000 precincts in Michigan where the vote
count was between 99 and 350 percent of the number of voters.  And then a few days
later, it came out that Mr. Ramsland had confused voting precincts in Michigan and
Minnesota.

Do you remember that happening with respect to Mr. Ramsland and the precincts
and turnout?

A  I don't remember.  No.

Q  Were you aware that Mr. Ramsland withdrew an affidavit at some point
related to his research and his conclusions about voter turnout exceeding the number of
registered voters?

A  That vaguely sounds familiar.  I think I remember that but I'm not sure.

Q  Okay.  What do you think you remember about it?

A  Just what you said, because you said it.  It kind of sounds familiar but I -- I
couldn't add to it.

Q  Do you remember there being any concern about that, about having to
withdraw an affidavit that Mr. Ramsland, who was also doing a lot of work with respect to
ASOG and the Dominion voting machines reports?

A  That, I mean, it didn't impact me.  I don't even remember it happening.

Like I kind of sort of maybe remember it happening, but no.  It had no impact on me.
Q Okay. And you mentioned a few times here today that you still have concerns about aspects of the election. Do you have concerns that Dominion in particular engaged in bad behavior with respect to the election, whether it's called fraud, irregularities, or otherwise?

A I mean, yeah, I'm still concerned about it. I would like to see evidence and, you know, I would like to have an opportunity to actually investigate. And I don't think a thorough investigation has been done. And to me that's suspicious.

Why. Why can't we see? Why can't the voters know that our vote is being counted accurately?

Q But as you sit here based on everything that happened, including the ASOG report and everything else about Dominion, is there in your mind I guess conclusive evidence of wrongdoing with respect to Dominion as far as how the votes were counted?

A I don't know. I have not investigated Dominion.

Q Okay. All right. If we can pull up Exhibit Number 6, please. This is a document that you provided to us, Ms. Bobb.

A Okay.

Q And if we start on the bottom of page 2, I think that's where the email thread begins. It's an email thread from Mellissa Carone to Patrick Colbeck about somebody named Anthony.

First I'll ask you do you know who that Mellissa Carone is that's listed there?

A Yeah. I know Mellissa Carone.

Q Who is that?

A I mean, she's a Michigan resident. She was one of the workers at the TCF Center in Detroit on election day. And I think she's kind of like a whistleblower. I don't know if she has whistleblower status or not, but she was one of the ones saying that
there was problems at the TCF Center.

Q Is she the person who appeared with Mr. Giuliani in some of the state legislature meetings that occurred?

A I think she was a witness. Yeah.

Q And how about Patrick Colbeck? Do you know who that is?

A I do. He is a --

Q Who is that?

A He is a former state senator of Michigan who I think he also worked at the TCF Center and witness -- I think he was also a witness from election night.

Q And did you work with Mr. Colbeck in your efforts related to the legal team?

A I have interviewed him. I cannot remember if at the time, I mean, if I sent you this email, I obviously got something from him. I don't remember specifically at that time what I did with him, but since then, like I've interviewed him as a journalist and reporter. But I don't specifically remember what I did with him at that time.

Q In this email it says -- or she says, excuse me, Please Re: Updated affidavit, and then attached three files called updated affidavit, original affidavit, and contact list of Dominion employee for election day. That gets forwarded a few times, including updated affidavit and documents attached, before it ultimately makes its way to you. Do you know if that's something that the campaign -- I'm using that term again to refer to the campaign legal team, is that something they requested from Ms. Carone or is this something she just did on her own?

A I have no idea. Where does it get to me? I'm sorry. Can you show me where I get on the chain?

Q Yeah, of course. We'll work up to that, but it does make its way first to Connie Hair.
Do you know who that is?

A No. Sorry. Hang on. No. I don’t know who that is.

Q Do you remember ever hearing about or working with Louis Gohmert’s chief of staff in the work that you or the legal team did after the election?

A Vaguely. Can you tell me his or her name?

Q Connie Hair.

A Oh, that’s -- okay. Maybe. Then I kind of sort of remember something about that but, I’m sorry, I don’t specifically remember.

Q Okay. And other than what you specifically remember, what do you kind of remember about Ms. Hair or working with Mr. --

A I remember something about Louis Gohmert’s -- Louis Gohmert wanting information about affidavits. I think it was a -- I vaguely remember somebody saying or -- I don’t remember how, but like how, you know, Gohmert wants to know how many affidavits we have or something like that, but that’s it. I don’t remember more.

Q And do you remember based on that vague recollection when that was? Was that like November, December, January?

A I don’t know. Quite honestly, I don’t even know that it was before -- you know what, I do remember. It was like April, because I was in Arizona at the time. So it was after -- sorry. It was after all the stuff.

During the time from November to January, I don’t think I had any communication with legal and stuff, I don’t think, but I --

Q So then Ms. McLaughlin, Lauren McLaughlin sends this to a few people including Sidney Powell who, going back to your question, Ms. Bobb, sends it to Andrew Giuliani, you, Rudy Giuliani, Jenna Ellis and somebody named Jorns.

A Okay.
Q  Do you know who McLaughlin is, Lauren McLaughlin?
A  Does she work for Gohmert?
Q  What's your understanding?
A  I remember working with some, like, not working with, but I remember
getting a question from someone on Gohmert's staff. The name Connie Hair does not
ring a bell. Lauren McLaughlin kind of sounds familiar, so I feel like she may have been
someone on the staff that was asking, but I don't know.
Q  And then Sidney Powell sends it to you and others. What do you -- do you
recall receiving this?
A  Not specifically.
Q  Do you remember doing anything with Ms. Carone's affidavit?
A  No. I probably would have just saved it with the affidavits but, no, I didn't
do anything specific with them.
Q  On this email that Ms. McLaughlin sends, she also sends it to Don Brown and
Lynda McLaughlin who's at Hannity. Do you know who Lynda McLaughlin is?
A  I've met Lynda. Yeah.
Q  And do you know if her daughter -- or she has a daughter named Lauren
perhaps?
A  I think it's her sister.
Q  Sister. Okay.
A  I don't know, but I think -- I think vaguely, if my memory is coming back, I
think Lauren is Lynda's sister.
Q  And based on the memory that's coming back as we sit here and do this, did
Lauren -- you still think that Lauren is somebody who worked with Mr. Gohmert?
A  I think so.
Q  Okay.  What about Don Brown?
A  I don't know.  I don't know.
Q  Do you know Don Brown?
A  Hmm-hmm.  No.
Q  And I recognize all the names on the "To" here, but Jorns at Temple -- or
   excuse me, Templar Baker, do you know who that is?
A  No.  But it sounds like he works at a law firm.
Q  If we go to page 4 of this exhibit, still on Exhibit Number 6, do you remember
   this document?  Looks like a checklist, and maybe we can zoom out a little bit to give
   you more of the context.  And based on your production, we understand that this was
   one of the attachments of the email we have been looking at.
A  Oh, okay.  I don't specifically remember this, but it could be familiar.
Q  Do you remember doing anything with this document?
A  No.  I don't think so.
Q  Okay.  If we go to page 5, this is also as I understand it, based on your
   production, an attachment that came with Mellissa Carone's documents.
A  Okay.  What is it?
Q  I'm going to ask you.  Do you recognize the handwriting on it?  Is that your
   handwriting?
A  That's not my handwriting.
Q  Do you recognize the document itself other than the handwriting?
A  No, I don't.
Q  Okay.
A  Looks like -- Michigan, Wayne County -- are those just the cities -- I don't
   even know what it is.  Are those just like the precincts within Wayne County?
Q I was going to ask you what you understood it to be, so I --

A I think, I mean, to my knowledge, I could be wrong, and you probably have

an email somewhere of me like explaining what this is, I don't know, but it looks like those

are the precincts within Wayne County. To my knowledge, I think this is the first time

I'm seeing this document, but it looks like the different precincts in Wayne County and

who to the contact for support.

Q Let's go to page 6 of this exhibit. This is another -- my understanding

another attachment to the email we were looking at in the same exhibit. Do you

remember seeing this document before?

A I don't remember having a specific recollection of this, but I probably could

have. I wouldn't have needed it for anything I was doing, but --

A Why is that?

A I don't remember doing anything at Dominion.

Q One of the things we talked about was a press conference at the RNC that

occurred on November 19 with Mr. Giuliani, with Ms. Ellis, Sidney Powell, I think

Mr. Epshteyn was there as well.

A Yeah.

Q You said you were not there. Did you help to prepare anything for that

press conference that you recall?

A Not specifically. I mean, I was -- at that point I had probably been working

with them for less than a week, so no.

Q Do you recall any concerns about anything that either was presented either

before it was presented or afterwards at that press conference?

A I don't have any specific recollection. No.

Q Ms. Powell mentioned Dominion, I believe Smartmatic as well during that.
And this is shortly before Mr. Giuliani issued the statement that said Ms. Powell is not working with the campaign legal team.

Is it your understanding that her comments during this November 19th press conference had anything to do with Mr. Giuliani’s statement on the 22nd just a few days later?

Could have. I don’t know.

Don’t know for sure though?

I don’t know.

I’ll pause there and see if anybody has any follow-up on what we have gone over. Okay. If we can go to Exhibit Number 8, please. This is also a document that you provided to us. Okay.

Very brief there, it’s from someone named Mark Finchem to Lyle Rapacki?

Yup.

And you. So, first things first, who is Mark Finchem, the person who sent this email?

Mark Finchem is a state representative in Arizona. You can see in his signature block, Arizona House of Representatives. He is the representative for Legislative District 11, based on his signature block. And he was also the one that chaired the hearing in Arizona.

And who is Lyle Rapacki?

Lyle Rapacki, I don’t know who he, like, his title or anything, but he was kind of like the go-through for Finchem.

Someone based in Arizona as opposed to Washington?

Yeah. Exactly.

Do you know if he was on Mr. Finchem’s staff?
A: I don't think he is, but I don't actually know.

Q: And here he's sending it looks like a list of people, and then the subject line says, Updated witness list. This is on November 29 at 6:08 p.m. The people include Senator Colbeck, Bobby Piton, Marissa Hamilton, Elizabeth Harris, Phil Waldron, Phil Evans and a few others.

What did you understand this to be?

A: At the time, I mean, I don't remember, because it was a year ago. But looking at this today, what I think this probably -- it's a little bit weird because the Arizona hearing was held November 30th. And so this could have been like who he wants to call for his hearing that's going to be held the next day, because he chaired it. And I'm guessing he was sending this to me so I could give it to the mayor, Mayor Giuliani, to say this is who Finchem would like to hear from at the hearing.

I don't know if these are the people who actually -- I mean, we would have to go back through the hearing to see who actually testified, but that's what this looks like to me today. What it was, you know, over a year ago, I -- I don't know.

Q: This suggests there was an earlier version of the witness list. What role did you or anybody on Mr. Giuliani's legal team have, if any, with respect to identifying witnesses for the hearing in Arizona?

A: So I coordinated with Mark Finchem for the hearing. As far as witnesses go, I don't remember if I gave him witnesses or not. I honestly don't remember.

Q: Okay.

A: Some of the ones -- if I would have given him witnesses, it probably would have been like Phil Waldron. The only one on this list that I would have, like, highlighted for Finchem probably would have been Waldron. The other ones I didn't know -- well, I knew Colbeck, but I don't think I would have said Colbeck for Arizona. I don't know why
he's on there. I don't know.

Q There's a phone number at the top of this screen right now, and that's in an email that you sent to Mr. Giuliani, Ms. Ellis, Mr. Kerik and Katherine Friess. And correct me here, is it "Frees" or "Frice"?

A "Frees."

Q Friess. Okay. So Katherine Friess. That's the phone number that you used?

A That's my cell phone number. Yeah.

Q Apart from this block --

[crosstalk]

A -- signature block. Like when you see that in all the emails, from my reply emails, I just have my cell phone number for my signature block.

Q Understood. Thank you. You can take this down. Thank you.

So tell us a little bit about your interactions with Representative Finchem. When did you first meet or communicate with Mr. Finchem?

A I don't remember the first, like, I don't remember the exact day, but it was not long after I joined the team, probably -- let's assume I started November 15, maybe a week later I called him to see if like what his thoughts were on everything that happened in Arizona, and see if he was interested in hearing some of the evidence that we had found in Arizona.

Q Is that something you were asked to do or is that something you did on your own initiative?

A I did that on my own initiative.

Q And why Representative Finchem as opposed to somebody else in Arizona?

A He took my call. I mean, I had limited phone numbers. And I was calling
people and he answered, and so it was Finchem.

Q  Do you remember calling other people in Arizona too or trying to call them?
A  I tried calling Kelly Townsend as well. I guess she had changed her phone number or something because she ended up joining the hearing; but, no, Finchem just happened to be the first person I got a hold of.

Q  Did you try calling Governor Ducey?
A  No. I can't remember, actually. If I did try, I probably didn't try that hard because I didn't think he would want to do anything with us, and he's the governor. Like I wanted -- I specifically wanted to talk to state legislators because in my estimation they are the ones with the authority. So I wanted to talk to the legislators.

Q  And you say that based on what you said earlier, that they have the constitutional authority related to elections as opposed to a governor, for example?
That was hard to hear your response, so just for the record --
A  Correct.
Q  Okay. Do you remember calling Rusty Bowers or anybody else in the Arizona legislature?
A  I don't know. I mean, again, we are getting really close to attorney work product. So I don't want to go too far down this lane without, you know, authority to release the information. But I made a handful of phone calls, but once I got Mark Finchem and he was interested and wanted to know what information we had, I kind of let Finchem run with it because he was the legislator, and it was his authority. He could do what he wants, and I wanted to support how I could support.

Q  Understood. And I fully appreciate the concerns and don't want to tread on them, but with respect to the legislators, I understand that they wouldn't be part of the legal team or a client necessarily. So did you talk to Rusty Bowers specifically?
A: I did not.

Q: Okay. How about others in the legislature? Do you remember talking to others?

A: Yeah. I mean, since -- at the time, yes, I talked to Sonny Borrelli. I talked to Leo Biasiucci. Once Finchem wanted to, like, wanted to be the one to hear the information, there was no need for me to continue to push. But once he started, once Finchem started looking into it, I guess, there were others that wanted to be involved. But I always -- I tried my best to kind of let Finchem do his thing because he was the state legislator and that was his thing and I played a supporting role.

And since then I've gotten to know many Arizona legislators through my efforts.

So, yeah, I know a handful of them.

Q: Okay. And just going back to that time though, specifically, when you had that first or first few calls with Representative Finchem, what was the dynamic like? Was he looking for information from you? Were you looking for information from him? How was it working?

A: We were just kind of like, hey, I've got concerns about the election; what about you. And it was we just were talking like what can we do about it. And it's a very novel issue, right. There will be law students that write papers about this in future legal classes.

So we were just discussing it and trying to figure out what -- what does he have authority to do, what's appropriate under the situation. And at the very least, I'm sure he -- I'm sure we talked about information that he would want to see, you know, have access to. It was very much like a hey, we both have a novel issue. Let's talk about it.

Q: Do you remember discussing with him on those early conversations what you described to us earlier that kind of plenary authority of state legislatures to --
Q: Could you repeat that? I'm sorry.
A: No. We did not talk about that early on at all.
Q: Did that come up later?
A: Later, like probably like in April. I don't -- I don't remember talking about that. I don't remember talking about that pre-January sixth. It doesn't mean we didn't. Maybe we did. I haven't -- I don't remember it.

To me that became an issue -- I feel like my recollection is probably not accurate on this, but the way that I remember was that really became an issue during the Arizona audit, which is April, May, June, July.

So I don't remember specifically talking about that at this time. The big concern would have been -- this is all out in the public domain, but the concern was for the states, I think Arizona, Wisconsin, Pennsylvania and Georgia had all submitted letters to Mike Pence saying, Hang on. We are not sure that the election was certified appropriately. Give us another chance to look at it.

Like that was the extent at that time that we were like, hey, just give the state legislators a chance to confirm whether they want to keep, you know, the electors that were certified or if they want to change them. And that was it. That was the extent of the question at that time.

Since the audit and since other investigations have happened, there were other discussions, but that has nothing to do with the January 6 stuff.

Q: Yeah. Sure. And I'm more interested in the former of what you just mentioned, the authority of the legislatures to select their own electors, or not certify, or do something with respect to certification of the vote in the state. So tell us about the
conversations you had with Representative Finchem on that issue, the one you just
described.

A The only one that I remember on that was that he told me he had a letter
with signatures on it and sent the letter in. That -- I mean, that's the extent of it, I think.
I mean, there were --

Q The letter --

A The letter from the state legislators. They, the Arizona state legislature, I
don't remember how many there were, but there was a number of state legislators that
said they signed a letter expressing concerns about the election. On that topic, that's
the only thing I remember talking to Finchem about.

Q And that letter being a letter addressed to Vice President Pence?

A I believe so. Yes.

Q Did you recall ever encouraging Representative Finchem to not certify the
election to the extent he could, or decertify the election, or select the Trump electors as
the state legislature under some theories might be able to do?

A At that time, no. Afterwards I reported on -- I mean, it was all open source.
You can see my reports. I reported on like what the legislature was doing, and I
interviewed him on it. But I don't -- I don't remember. The only thing I can say like I
know happened was the letter that was sent to Mike Pence.

Q Okay. Did the campaign or the legal team have any role in drafting that
letter, encouraging that letter?

A Drafting the letter, I would say no. I mean, I did not, and I don't think Rudy
did. If -- I doubt Jenna or Boris did, so I don't believe -- I can only speak for myself. I
did not. If others did, I don't know about it. Encouraging the letter, I mean, that's
a -- that's kind of a loose term.
It's possible that somebody on the legal team was like, yeah, it would be a great idea. I don’t know. But I don’t have -- I don’t specifically remember -- I mean, I don’t know.

Q  Do you remember encouraging any state legislatures whether in -- state legislators, excuse me, whether in Arizona or otherwise to sign on to a letter like that to Vice President Pence?

A  I don’t remember. I don’t think so. I -- I also am not super confident in my recollection, but as I sit here today, I vaguely remember being surprised to get the letter, like not like, oh, I didn’t even know this was happening, like, like happy to see it. So I don’t think I did, but I honestly don’t remember.

Q  Still on the Dominion voting machines, or voting machines more generally issue, do you remember Mr. Giuliani or anybody on the legal team calling first the Antrim County prosecuting attorney to request that he turn over voting systems and voting machines?

A  I don’t know anything about the machines in Michigan. The role that I played was with the witnesses and the GOP, the folks on the ground. I don’t know anything about the Michigan machines.

Q  Do you know whether Mr. Giuliani, you or anybody else on the legal team asked anybody to get access to voting machines?

A  I don’t know. I know there was talk about the Antrim County. I think Matt DePerno with the Bailey case where they got access to the machines. So I know there was talk about that.

To the extent that someone said can you get access to the machines, that sounds weird. And so, no, I don’t think anybody would have, certainly not surreptitiously, but to my knowledge I thought we had access through -- we, not we, but like Matt DePerno
had access through his Bailey case. So from my perspective, like there was somebody looking into it. It wasn’t necessarily our legal team, but I was curious what they would find.

Q And tell us about that. So who is Matt DePerno?

A Matt DePerno was the attorney for William Bailey in the Bailey versus Antrim County lawsuit that actually got access to the voting machines.

Q And what relationship did you or the Giuliani legal team, the Trump campaign have with Mr. DePerno?

A At that time, none. We were just watching the case. We -- I reached out to him and I’ve since got to know him. He’s now running for attorney general in Michigan, but I didn’t know him before the case.

Q And when say no relationship, no formal relationship. He wasn’t working for the campaign. Is that what you mean?

A Like we didn’t even know each other. Like we had literally no relationship.

Q Do you know if he was sharing information with the campaign that he was getting from that case?

A I’m sure he would have, but I don’t think -- that case went past January 6th, so I think, I don’t -- I don’t know. I don’t remember the timeline, but I -- to me, the information that came out from Antrim County came out after January 6, I think. During like November to Januaryish time frame, I don’t remember, I don’t remember getting any specific information from Matt DePerno.

Q If we could just -- this is jumping ahead just a little bit, but if we could pull up Exhibit Number 11. So the judge in that Bailey case issued an order mid December granting access to certain voting machines, Dominion voting machines. And there’s a report that came out called the Allied Security Operations Group Report came out
December the 13th.

A  Um-hmm.

Q  Does that refresh your recollection as to kind of the order of operations with
the respect to access to voting machines in Michigan?

A  Yeah. So this, obviously this report came out in mid December, but there
was another -- they had another expert look into it, because I remember it because we -- I
was not doing like media interviews on the legal work that I was doing, and I did one on
this, which is why I believe it was after my role.

Q  I see.

A  I reported on this. And I wasn't reporting on what I was working on until
after I was done with it, so that's why I think it was January 6 but, you know, it could have
come out sooner. There was another expert. This isn't the -- I did report on this
report, but there was another interview that came out that OAN did with one of the
experts in the Antrim case. It was not Russ Ramsland. It wasn't this ASOG group. It
was another one that I think was probably like Februaryish.

But, anyway, sorry. I guess it doesn't really matter. What's the question?

Q  Yeah. As I've mentioned, so this came out as a result of a judge's order in
that Bailey case that was on December 6. And right after that, Jenna Ellis said that
essentially it was a good day, or something to that effect, because we got access to the
machines.

And so I'm trying to just better understand what role the campaign was or what
the information they were getting as a result of this Bailey case and why Ms. Ellis, for
example, would say, you know, we got access?

A  Yeah. No, we had access in the sense that it was now out in the public
domain, like the report was made public, but like we didn't -- the campaign legal team did
not have, I mean, like privileged access or anything.

When she said we, I think she meant like finally somebody. And I'm --

[crosstalk]

A -- not put words in her mouth, but it wasn’t we as in the Rudy Giuliani legal team.

This report is prepared by a group called the Allied Security Operations Group, or ASOG?

Ms. Bobb. Yeah.

And as you can see in I think in this second paragraph on this document, Russ Ramsland is part of the management team of ASOG. And earlier you mentioned that he was working with your team.

I mean, is there -- is it fair to say that the Giuliani team had at least some connection with the group that was investigating these machines or had access to them?

Ms. Bobb. I think it's bit of a stretch. They are expert witnesses. And expert witnesses often work on multiple litigations. Just because you are an expert witness in one case and in another case doesn’t mean those two cases are related. And that's what this is. They -- they were working as expert -- Phil Waldron, and to the extent that Ramsland is an extension of Waldron, they gave us some information, but this they were working as experts specifically for Matt DePerno’s case. This was not on behalf of the Giuliani team.

BY

Q Do you know why Miss Friess, Friess, I'm sorry, Katherine Friess traveled to Antrim County in November to gather evidence from Dominion voting machines?

A I don’t know.

Q Do you know that she went to Michigan in late November related to voting
machines?

A Yes. I did know that.

Q Okay. What do you know about that?

A That she went to Michigan. That was it. I didn’t work it with her, but I know that she went.

Q Did you understand that her trip was related to what was happening in the Bailey case and getting access to voting machines?

A Probably. I mean, I didn’t like make those mental leaps at the time, but as we sit here, I can probably say that’s probably accurate.

Q Do you know what information Ms. Friess was able to collect during that trip she made to Michigan?

A I don’t know. You would have to ask her.

Q And at one point Mr. Giuliani claimed his team spent eight hours analyzing the machines from Michigan. Do you remember him talking about that?

A No.

Q I believe the judge in that case ordered that the ASOG report be released sometime around mid December 14th. Are you aware of anybody on the legal team, the Giuliani legal team having access to Mr. Ramsland’s report before it was officially released?

A I don’t think so. I didn’t. I don’t think so. I don’t know. I didn’t. I can’t say if anybody else did or not, but I didn’t.

Q Have you ever heard of somebody named Conan Hayes?

A Yes.

Q Who’s that?

A He is a computer guy who worked with Phil Waldron, and --
Q Do you know if --
A -- Russ Ramsland, I think.
Q Okay. And I'm sorry for cutting you off. Did you say you think he may have also worked with Russ Ramsland?
A I believe so. I don't know exactly, but I assume they are all together.
Q And do you know if Mr. Hayes had any role in analyzing the Dominion voting machines in Michigan?
A He could have. I don't know. As you can tell, I don't have a lot of the information about that research, but he could have.
Q I think there's been public reporting, and I hope I'm not going to mischaracterize it, but I think there's public reporting that Patrick Byrne provided a private plane to fly people to Michigan related to inspection of voting machines. Do you know anything about that?
A Patrick Byrne, I know he was very active in doing this. He was not part of what we were doing. He did have a private plane. He used it. Who he had on it or where they went, I don't know. You would have to get it from him, but it's plausible.
Q Do you know if Ms. Friess was on that plane?
A If Patrick Byrne had a private -- like chartered a plane for them to go to Michigan, she was probably on it, if she went. I mean, I believe she went. I believe that that, like, that's kind of what happened. I just don't know.
Q Okay. What's your understanding of Mr. Byrne's role with respect to financing any inspection of voting machines, if any?
A Oh, he's been very interested in it and he's started -- I have not personally worked with him on it. I have not personally worked with his efforts, you know, in the time frame that we are talking about. I don't know exactly what he's done, but I do
know that he was very curious and passionate about it.

And, yeah, and he's got a lot of finances, so I'm sure he financed a lot of stuff, but I
don't know what it was or what he did.

Did you ever fly in a plane that was financed by Mr. Byrne?

Ms. Bobb. No.

All right. If we could pull up Exhibit Number 10, please.

Ms. Bobb. Actually, no, I did not. Sorry. I was on a private plane once, and I
think -- I think that was Rudy's. I don't know who it was. Byrne was on it. No one on
Byrne's team was on it.

Where did we go? I don't remember, but I think it was to Florida. I don't know.
But it wasn't -- I don't think it was Byrne's stuff, but in case I'm wrong, I'm letting you
know I might be wrong.

Okay. And just to be clear, this was Mr. Giuliani's private
plane?

Ms. Bobb. He doesn't have a private plane. It would have been -- I don't know
how people with private planes do it, but like they help each other out. I don't know.
It's like an Uber. I don't know how you do it, but somebody had it, so...

Q So this issue related to voting machines, and Antrim in particular and
allegations about vote switching, and as a result of Dominion issues it was pretty
important in Michigan. So as somebody who was involved in the Michigan efforts for
Mr. Giuliani and his legal team, how come you weren't more involved in these issues,
Dominion and Antrim County?

A Because it wasn't our focus. Our focus was what Rudy would call
traditional litigation, like witnesses, affidavits, physical evidence. The machines are very
interesting, and I would like to know if they are secure, and we are curious about whether
they are secure. And to the extent that there is evidence of problems with them, you
know. There is evidence of problems with them. Democrats in 2019 wrote a letter
about all the problems they have with voting machines.

So the whole discussion of voting machines I think is a healthy one, but our focus
was traditional litigation, get witnesses, get affidavits, get, you know, physical evidence.

Q One of the allegations that was used quite frequently was that there was a
6,000 vote switch in Antrim County or something to that effect.

A Yeah.

Q I believe that's directly related to Dominion voting machines and issues with
that. So I guess I'm trying to understand why there's not more of a correlation. If the
legal team is making this claim about 6,000 vote switches, how could you not also be
looking into the Dominion voting machines?

A They could be. I'm telling you I wasn't looking into voting machines but,
you know, Colonel Waldron and like there were people looking into it. To the extent
that Mayor Giuliani wanted to look into it, I mean, you can ask him about it, but my role
with Rudy was traditional litigation.

Q Okay.

Maybe I'm misunderstanding, but why did Mr. Giuliani not feel
that issues with the Dominion voting system machines could be like a component of
traditional litigation?

Ms. Bobb. You'll have to ask him that. And I'm not saying that he didn't think
that was it at all. I am telling you my role with him was to do litigation. He could be,
you know, he worked with Colonel Waldron. I know Colonel Waldron gave him
information. Dominion voting machines for Mayor Giuliani was not part of my role.
Understood.

BY

Q  Do you know whether Mr. Giuliani or others on the legal team believed that the Dominion allegations and the vote switching and error rates had merit?

A  I think we all -- are you talking about at that time frame?

Q  Yes.

A  I think we all were interested in knowing that. I don't know. I mean, you'll have to ask him what he thought, but I am interested in what happens with it.

Q  And do you know whether Mr. Giuliani and others thought that the machines had been hacked by foreign countries or foreign entities, for example, related to the November election?

A  I don't know. I don't think -- I don't know. I don't think that Rudy thought that they -- I don't think Rudy thought that there was a foreign issue, but I don't remember. You'll have to ask him. We were not focused on foreign interference. I mean, it was a discussion, you know. There were allegations about it and stuff, so I am sure we had a conversation or two about it at some point, but that wasn't like what we were focused on.

Q  And you mentioned what the understanding was then, but what about now? I mean, as you sit here now, do you think these Dominion allegations, some of which we have just gone over, had merit, or do you know? Are you in a place to even know that?

A  You asked me that before, and I would say the same thing I said before, which is I am very curious to know. I think there's problems with it. I think the fact that they are not open and honest and not letting people see what they are doing is very concerning. So I still have concerns about Dominion. Yes.

Do you have a sense of why there wasn't a focus on foreign
interference? Was it just that attention was focused elsewhere or was it that, you
know, there was these investigations weren’t productive?

Ms. Bobb. I think there’s plenty of evidence of domestic interference that we
don’t even need to get to foreign interference. Maybe there’s foreign interference too.
I don’t know. But there’s plenty of evidence of domestic problems so, you know, let’s
focus on that first.

BY

Q All right. So we have up here Exhibit Number 10. This is just a cover
sheet. It’s called Dominion Voting Systems. And then it’s overview dated 12/2/20.
You scroll down there, it says, History, executives, vote manipulation, ability and
design, foreign ties, and Mrs. Friess’s name is on there.

Have you ever seen this before?

A I’ve never seen it.

Q Did you know that Ms. Friess was working on a report related to Dominion
voting machines?

A I did not.

Q There’s some suggestion that Ms. Friess took over this report for somebody
else named Joanna Miller. Do you know who Joanna Miller is?

A I do know Joanna Miller. She at the time was like a 22-year-old aide to
Pete Navarro. There’s no way that -- no.

Q What was her role with -- if anything, related to claims of fraud or looking
into allegations of improprieties related to the election?

A She helped Peter Navarro. I mean, she worked for him. And Peter put
out his three reports, whatever, and Joanna did a lot of research on that. And this could
be a compilation of Joanna’s work. She’s very smart and very capable.
I had not seen this before, but if she took it over, it was -- it was -- Joanna was junior enough that she wouldn’t put her name on a report. Do you know what I mean. It would have been she would have been providing research to Peter, and Peter would have owned it to the extent that he wanted to use it. I don’t -- Joanna would not have been drafting a report in and of herself.

This could be -- I don't know. I mean, I’ve never seen this document before, but it could be something that Joanna put together and was planning on giving to Peter or something, but she would not have put her own name on it.

And you can take this down, Thank you. BY

Q Did you work with Ms. Miller on anything related to the election?
A Well, not -- yeah, kind of. I mean, at the very end, like probably late December or January. I'm sorry. What was the date of that report?
Q This was dated December 2, at least on the cover page.
A All right. So I would have gotten connected with Joanna later, probably like maybe right before Christmas. And I remember sharing information with her, I guess, you know, trying to check my own work and check numbers because she had done work for Peter Navarro's reports. But it was nothing more than that, just being like, hey, where did you get -- you know, checking her sources, checking my sources. We had a couple conversations about it, but that was it.

Q Who connected you with Ms. Miller?
A Probably Peter. Rudy and Peter worked together, and they probably had us -- I don’t remember. I'm guessing.

Q Were you asked to work with Ms. Miller to compile any information or do anything in particular?
A I don't remember specific, like, hey, will you work with her but, you know, Peter Navarro was looking into the election stuff. Rudy was looking into the election stuff. So it made sense that we would share notes. I say that informally, share notes, but that's it.

Q Did you think it was odd that she being a White House aide or employee was doing this with Mr. Navarro looking into claims related to --

A No. I -- foreign -- based on the report, if it's foreign interference, I think that's perfectly appropriate to do.

Q And Mr. Navarro of course is a trade advisor in the Administration --

A He wasn't -- (audio distortion)

Q Say that again. I'm sorry.

A He was also the advisor on China. Peter Navarro has a very broad range of capabilities and abilities. And so, no, I do not think it was inappropriate for them to be looking into this.

Q And so did you help -- let me start over. Mr. Navarro ultimately released a three-part report, I'll refer to it as the Navarro Report. What was your role, if any, with respect to that?

A Nothing. I mean, he was doing that -- Joanna and I talked a little bit, but I don't -- we never like shared document. Like I said, I never even saw the document, but no. They did their thing. We were doing our thing. And to the extent that we had questions or whatever, I would ask her. That was it. It wasn't --

Q What did you do with the information that Ms. Miller gave to you?

A I don't remember what she gave to me. Like there wasn't anything specific that like either -- I don't remember her, I mean, I don't remember specifics of it. You know, I just remember us talking about stuff. And I used the term comparing notes kind
of metaphorically, but I don't remember like an actual swap of anything.

Q Was it your understanding that she was helping Mr. Navarro compile this report he was working on?

A When you said the report, you are talking about his three-part report?

Q Correct.

A I believe Joanna worked on that, but I don't know.

Q Did she tell you that?

A No.

Q What about Garret Ziegler. Do you know who that is?

A I do. He also worked for Peter Navarro.

Q What was your interactions with Mr. Ziegler, if any?

A Similar, similar to Joanna. They are young staffers who were, you know, avid researchers doing research on stuff, and we talked.

Q Tell us about this conversation. What did you guys talk about?

A Garret and Joanna are -- it's like they are interchangeable. They sat right next to each other outside of Peter Navarro's office, and to the -- I don't have a specific thing that I can say this was the exchange of information, but I -- I remember talking to them.

Q Okay. And without getting into necessarily to the specifics or seeking from you the exact information you gave to them, what was your understanding of what they were doing with the information or the help that you were giving them?

A I don't know. I mean, same thing we were all doing, just trying to figure out what happened. I didn't ask, hey, are you compiling a three-volume report on this, like, I don't know. We were just talking.

Q And Mr. Navarro has said, I believe, that much of what he and his team
included in the Navarro -- the three-part Navarro Report came from Rudy's team. Is that accurate so far as you understand it?

A  Yeah. It could be. I mean, I don't know. I did not help compile Peter's report. So I don't know what they did or how they got it. But I shared, like I -- I don't have a specific recollection of this happening but, for example, what could have happened is Joanna could have called me and said, hey, I am looking at this information. Does this jibe with the information you have. And I would have said yes or no. So I -- I did not know they were putting together a report. It was just we were just trying to check and make sure that we were accurate in our work.

Q  And who else from Mr. Giuliani’s legal team was working with Ms. Miller or Mr. Ziegler or Mr. Navarro?

A  I think Katherine Friess did for a little while. I don't know. Katherine and I actually did not work very closely together. She was, as you can tell, doing other things than what I was doing. So I don't know what she did with Peter Navarro or not, but as far as I know it was just Joanna and Garrett.

Q  If we could pull up Exhibit Number 13. And while that's coming up, do you know where Joanna and Garrett were getting their information from?

A  Nope.

Q  Do you know where Mr. Navarro was getting the information that went into the report from?

A  No, but I think he cites his work, right? Doesn't he -- isn't it in the report?

Q  So on this Exhibit Number 13, this is an email from Jenna Ellis to Jason Miller, Tim Murtaugh, Ross Worthington, Vince Haley, and Mr. Giuliani. This is from December 7th.

A  Okay.
Q Subject is -- and you are not on this. So, to be clear, I won't ask what your role is in this.

A Okay.

Q But it says, Updated PowerPoint and sources, along with tables with footnotes and voter fraud, state-by-state election fraud and otherwise. And then she says, Ms. Ellis says, Here's the updated PowerPoint on state-by-state for POTUS. And if we go to page 2, it begins a series of charts and other information.

If I'm not mistaken, some of this information in a similar or the same form appears in Mr. Navarro's report.

A Yeah, I --

Q Do you remember seeing any of these charts?

A It looks like what's in Peter's report. I have read his report, but I don't know. I didn't ask. I don't know where this came from.

Q Ms. Ellis sent this, like I just mentioned, to others. Do you know what her role was with respect to helping Mr. Navarro or Mr. Miller, Mr. Ziegler with the research they were doing for their Navarro report?

A I'm not aware of any, but I don't know.

Do you have any questions on this document?

It looks like Ms. Ellis in addition to sending this to Mr. Jason Miller and Tim Murtaugh sent this to Ross Worthington and Vince Haley, who I understand to be on the White House lead training team. Do you know if there was some sort of channel for conveying information was being developed through the Giuliani team's legal effort into the speeches that President Trump was delivering around this time?

Ms. Bobb. I have no idea.
Okay. If we could pull up Exhibit Number 12, please.

This is a document you provided to us. And it’s a COMs alert from @GOP.com to apparently to a mailing list about Dominion voting demands, Sidney Powell retract baseless election claims. And then Jason Miller sends it to a number of people saying flagging.

And you are on the recipient list of that email, and then you reply and say, Sounds like they are sending these to everyone, and then asterisk, angry face. Do you remember this email?

No. But it sounds like something I would say.

Why reading it now and looking at it, why did you say angry face? I don’t know. Can you show me what it was that they sent?

Yup. We can scroll down to the bottom. It says that Dominion voting systems sent a letter to former Trump campaign lawyer Sidney Powell on Wednesday, demanding that she retract her wild and knowingly baseless and false accusations about the company's voting machines.

Yeah. I can see it. So, I mean, I don’t remember sending it. Obviously I did, but I probably said the angry face because it's frustrating when you are actually -- when you have leads and you have good evidence and you are following your leads and you are trying to investigate and everyone’s going, There’s no evidence. There’s no evidence. Retract your wildly knowingly and baseless and false accusations. That's not true.

That wildly knowing baseless and false accusations is not true. It’s never been true. I know the media said it, but we have information and apparently Sidney had -- I don’t know what Sidney had. You would have to ask her. But it’s just frustrating to
have some -- you hear all the time, Oh, there's no evidence of fraud; there's no evidence of fraud; there's no evidence of fraud.

There's a lot of evidence of fraud. And so to have everyone, you know, send a note like this, or have Dominion send a note like this that says retract your statement; no, I'm not going to retract my statement. What I said is true.

I'm guessing. I don't know. But that's probably the sentiment that I had at the time.

Q So if you look at the bullet points on here, this says, Specifically Powell's claim that the company worked with Hugo Chavez, the late Venezuelan dictator and employed machines with a vote-flipping algorithm; and then it says, The Trump campaign announced in November that Powell is no longer working with President Trump or the campaign after a wild press conference in which she said President Elect Biden won the 2020 election thanks to, quote, Communist money from the Venezuelan regime.

So are you saying -- you just mentioned that you thought that there was evidence of claims related to this, and that might have been why you said angry face. Are you aware of evidence that the legal team had for those two bullet points that I just read to you?

A I don't know specifically, but I do know that I think it's Smartmatic, Smartmatic is a Venezuelan company. And you'd have to -- I haven't -- again, I wasn't researching Dominion. I wasn't researching Smartmatic. That was not my role. But I do think there is -- I don't -- those claims, you know what, I don't know. I don't know. There are -- there are pieces of evidence that, you know, those claims didn't come out of thin air. I don't know what they are. I don't know the veracity, you know, the extent to what they go, but I don't know. You'll have to ask her.
All right. We can pull that down. Bear with me just a moment.

Mr. Sibley, when you get to a break in the line, if we could take a short lunch break would be great.

Yeah. Absolutely. And this actually may be a great place for that. Why don’t we do that now. Let’s go off the record.

[Recessed at 1:17 p.m.]

Let’s go back on the record. It’s 1:46 p.m. Eastern. And we are resuming the interview of Ms. Christina Bobb.

I’m going to ask to pull up Exhibit Number 15, please.

Q Ms. Bobb, this is not a document that you produced, but let’s see if you recognize it. All right. So this is a document dated December 16, 2020. It says, Presidential Findings, to preserve, collect and analyze national security information regarding the 2020 general election.

Do you recognize this document?

A I think so. Can you scroll, please?

Q Of course.

A Can you scroll some more. Keep going. Okay. So I don’t know if I have this exact document. I know this is the executive order that was like in the news or whatever.

Q Yes. This is one of two executive orders. This one in particular dated December 16 talks about the Secretary of Defense seizing voting machines. And then there’s also another one, also dated December 16, that talks about the Department of Homeland Security.

A Yeah. So I remember this. This was something that Colonel Waldron --
don't know who exactly he was working for. I can tell you I was invited to a lunch with Colonel Waldron. Colonel Waldron was going to lunch. They invited me. He was doing work for, I don't know, I shouldn't say he was doing work for. He was connected to the Sidney Powell/Patrick Byrne camp, which I was not connected to. And he was like, hey, do you want to grab lunch. So I went to grab lunch and was there for lunch, and they started talking about, you know, strategizing and trying to figure out how to get information to -- I don't know exactly the extent of this document. But how it came about was when I was there, I had my laptop with me. And I was the only one there that had a laptop or something to work on, and they asked me if I could start a document to take notes for them on this. And I started the document, took their notes down, whatever. And then Colonel Waldron asked me to email it to him, which I did. What happened with it from there, I don't know.

So I don't know. I'm not sure that this -- I don't know. I don't know if this is -- this looks like what I originated on my computer, but I think it went past whatever I had done, because what I had done, I think -- when I say I had done, I started the document. They wanted to work on it. They used my computer to work on it, and then when they were done doing whatever they were doing, said, hey, can you email this. And I think that's probably it, but I am not -- you know what I mean, like, I don't know what they changed after it left my computer.

Q Yes.

A But I had some role in initiating something like this in the sense that I had a computer that people wanted to use, and that was it.

Q Okay. All right. So let me unpack some of that. You are with Colonel Waldron. Who else is there?
A It was people that he was working with. I don't know their names. I know there was a guy named Mike. I don't know his last name. And it was folks that -- like it was the machine team folks that, you know, I didn't really know them.

Q Do you know if Mr. Ramsland was there?
A I know Russ. He was not there, I don't think. I mean, he wasn't there when I started this. If they moved him into this later, possibly. But when I was at the lunch, because I know Russ, so I would have known if he was there.

Q And where was the lunch?
A Trump International Hotel.

Q And do you know roughly when?
A Well, if it's dated December 16, I would guess sometime slightly before that, but I'm not sure.

Q If you go back to that guide post that we used before of the Electoral College meeting and voting on the 14th, do you think it was before that or after that?
A I think it was probably on December 16.

Q Okay. Do you remember General Flynn being there at the lunch?
A He was not there, because I know him.

Q All right. So far we have Mike, Colonel Waldron, you --
A I'm sorry. I didn't mean to interrupt you.

Q That's okay. And a few others from Colonel Waldron's team?
A Correct.

Q Anybody else that you recall?
A No.

Q What about Sidney Powell?
A She may have been. I don't know. Like because I gave them my
computer, they finished doing whatever they were doing. While they were doing that, I was working from my phone and taking calls, so I would step out and come back in. So to the extent someone came in and out, I don’t know, you know.

Q When you started working on this, or what became this document, were you working with something else as an example? Like did you have another executive order that you used as a model?

A Probably. And I wasn’t -- like I probably just found one and put it together, but just so you know, I was not putting -- I didn’t do the substance and stuff of this. Like the authorities that they used and all that, I didn’t do that. I just literally just like formatted it.

Q Okay. So the authorities that -- you are talking about that first paragraph?

A (Indiscernible) -- the entry -- three, 13848, those authorities, like I didn’t choose those authorities. They did that. I literally -- (audio distortion) -- December 16th, like I put it in. I literally started a Word document and gave it to them to work on.

Q And were you typing up from scratch or did you have something else that you were modifying?

A I wasn’t typing it. So the -- like I probably -- I probably did pull up an executive order just to see like the title, but literally past the title, I did not provide that content.

Q Okay. You gave your computer to Mr. Waldron. Is he the one that was typing on your computer when they were working on this document?

A He did some of it, and then this guy Mike, whoever he was, was doing some of it. I don’t know. It was like they were brainstorming collectively and working. I don’t know.

Q One of the things you mentioned there in the authorities, just past those
that you referred to, are National Security Presidential Memoranda 13 and 21.

Did you have anything to do with inserting those?

A No. I had nothing to do with the authorities.

Q Okay. Do you know who chose those two Presidential Memoranda 13 and 21 to include on this?

A No.

Q Do you remember Colonel Waldron or Mike or anybody else typing --

A Colonel -- I'm sorry. I don't mean to interrupt you.

Q That's okay. Do you remember them talking about presidential memoranda?

A I remember vaguely, like I don't have a good recollection. I'm going to give you what I think I remember. And I remember it sounded like they wanted to do something intelligence related, and EO 12333 is like the standard intelligence authority.

So I remember thinking that that made sense. And then I remember thinking I have no idea what they are doing with the other stuff. That's the extent of my memory.

Q Okay. As far as the next paragraph it says, I, Donald J. Trump, President of the United States, find that the forensic reports of the Antrim County, Michigan, voting machines released on December 13th -- and then it goes on.

Did you have any role in writing this either as a scribe or something that you came up with?

A I definitely didn't come up with it. I could have been a scribe. I mean, I was -- I was a scribe for a lot of things. And, like I said, I started this document. I don't -- like I've also said, I don't have the information on Dominion voting systems.

So if I physically typed this out, I had to have someone dictate it to me because I don't have this information.
Q Tell us about the conversations you had with Mike and Colonel Waldron about this. Like what was the purpose of it, as you started to draft and pull up an example --

A I didn't -- I honestly didn't have a whole lot. They had mentioned that they were brainstorming some type of proposal to see if there was some government action to be taken on machines or whatever. I don't know a lot about the machines. I don't have a lot of information on the machines. And I was more curious about the authorities because, you know, I didn't know what authority they would use to do it.

And the two documents, one being DOD, one being DHS makes sense because I remember, you know, there was posse comitatus issue and they were talking about, you know, like ODHS needs to be the lead because the military can't do it, whatever. I don't know. I don't even think I weighed -- I do not remember weighing in on anything substantive about this.

Q Okay. So that was going to be my next question. Without disclosing any legal advice you may have provided, were you asked to provide legal advice about this and weigh in from your perspective as a lawyer?

A I don't think so. No.

Q If we go to the bottom of this page, so bottom of page 2, the order, if signed, would direct a few things: One -- and they are all listed at the end here. The first one is Secretary of Defense shall seize, collect, retain and analyze machines, equipment, electronically stored information and material records. It goes on to describe some of what those are.

If you go to the next page on number 2, it says, Within seven days of commencement, the initial assessment must be provided to ODNI. Number 3, DNI shall deliver this assessment and supporting information to the President, among others.
Then it talks about a direct liaison. It also talks about using National Guard support potentially, as well as assistance from the Assistant Secretary of Defense for Homeland Security, coordinating with the Department of Homeland Security. And then the last one talks about the appointment of a special counsel to oversee this operation.

On the last point there, it says that the appointment of a special counsel to oversee this operation, institute all criminal and civil proceedings as appropriate based on the evidence collected and provided all resources necessary to carry out her duties consistent with federal laws and the Constitution.

What do you remember about any discussions related to the appointment of a special counsel in connection with this document?

A I have limited -- like I have hazy recollection, but based on the fact that it says "her," I'm guessing they were probably thinking Sidney would get appointed, but I can't confirm that.

Q Okay. Do you know why Colonel Waldron wanted Sidney to be appointed as a special counsel?

A I don't.

Q Tell us about any other conversations about having Ms. Powell or anybody else appointed as a special counsel with respect to election issues.

A I don't -- I don't have any information on it. It was never anything that I worked on or pushed. It was certainly never anything Rudy -- I don't remember anything about it. It wasn't anything I worked on with Rudy. I do remember, you know, the effort to create this thing, but I don't know. This was not my brain child, so I don't know.

Q Now, working on their -- on your computer, how does it get to that? And I'm sorry if you already said this.
A Yeah, that's okay. When they were done with it, they gave me my computer back and said -- I don’t remember who said it, but it was probably Phil said can you email this to Phil, or can you email this to me. And I sent it to Phil from there, and that was it.

Q Do you know what Colonel Waldron or anybody else did with this or the other executive order, so the DOD or DHS one?

A I don’t know. I don’t know if they continued to tinker with it. I don’t think it ever went anywhere. I think it was somewhat of an academic exercise to see if there were government authorities that could assist, but I -- to my knowledge, nothing ever came of it.

Q Do you know whether this was ever -- or either of the executive orders we are talking about were ever presented to the President for his consideration?

A I don’t. To my knowledge, they were not, but I don’t -- I mean, I can’t confirm if someone else did it, but I don’t think this ever made it to him. I don’t know what --

Q I’m sorry. I interrupted you. What was the last part you said?

A I just said I don’t know how it would have gotten there. I don’t know how it would have gotten to his desk, because Rudy wasn’t doing it, so I don’t know who they would have given it to him, who would have done it. I don’t know.

Q Other than any privileged conversations or protected conversations you might have had, are you aware of any conversations other than presenting these documents, but any conversations with the President or anybody in the White House about using an executive order to seize voting machines?

A I’m not aware. I don’t have personal knowledge of anything. I read media reports that something like that happened, but I have no personal knowledge of
that.

Q One of the presidential memoranda -- before I get there, you mentioned two executive orders which made sense because of issues related to -- or possible issues related to posse comitatus.

Do you remember there being a discussion with Mr. Waldron or by Mr. Waldron with others about this concern that using the military to seize voting machines could look like a domestic law enforcement function?

A Yeah. Yeah. I don't know what lawyer they were going to run this through or how they were going to do it, but they were trying to follow the law. I mean, obviously it's an executive order. It's got to be legal in order for it to be signed. So, yes, they were talking about that.

Q Did you express any reservations about this discussion about a possible executive order or this document that was drafted to be sent to them?

A No. I mean, it was like not a thing that I thought was -- no. I had no concern at the time, nor do I have concern about it now.

Q One of the presidential memoranda that we talked about briefly is number 21. And I understand that until this was reported publicly, that the existence of that memoranda was classified.

Do you know who got information about this memoranda 21 and how that specifically was inserted into the draft EO?

A Nope. I have no idea.

Q Do you remember who did draft that section? Was it Colonel Waldron himself or somebody else?

A I have no idea, because like I said, I kind of handed off my computer and was working from my phone. So I have no idea who drafted what. To be clear, I had a
clerical role in it, starting the document. I don't, you know -- but I didn't draft that, nor

do I know who did.

Q Okay.

Do you have any follow-up questions on this? If we can pull up Exhibit Number 16.

BY

Q This is an email, I believe it's from Colonel Waldron to Bernie Kerik, Katherine Friess and General Flynn.

Did you ever learn about or know about General Flynn's involvement in anything related to seizing voting machines or this draft executive order?

A No. My knowledge of it was what at that lunch where I gave my computer and let them work on it. I thought that was the extent of it. I didn't know it went any further. I don't know how you -- because I don't know, I haven't seen this email, but is General Flynn, is his executive order substantially similar to the one we just looked at?

Q Yeah. If we go to page 2 of that exhibit.

A Oh, yeah, there it is. It's like the same thing. Okay. No. I didn't know about his role in this.

Q And if we go to page 5 of the same exhibit, General Flynn writes that he reviewed and fixed spelling errors in the title, ensures it gets a legal review.

A Yeah.

Q And says, Ready to go from my standpoint. You don't have any knowledge about that interaction or exchange?

A I didn't even know it went that far, but no.

Q Was General Flynn part of the Giuliani legal team so far as you understood it?
A: No.

Q: Did you ever talk to Ms. Friess about this idea of seizing voting machines or the draft executive order?

A: No. This is actually the first I'm learning of it. It's kind of funny. I had no idea. No. I didn't know.

Q: Are you aware -- you can take that down? Thank you, [redacted].

Are you aware of a phone call that Mr. Giuliani made to Ken Cuccinelli about seizing voting machines or possibly seizing voting machines from DHS's side?

A: No. I don't -- I don't have specific knowledge or recollection of that call.

I'm sure that whenever I, you know, drafted or helped draft that document I would have told Rudy that I did it, just because I wasn't -- you know, I worked for Rudy. I wasn't working for General Flynn or anybody else. So I would have mentioned it, but no, I wasn't aware it went any further.

Q: Do you remember -- well, let me start over.

Do you know Mr. Cuccinelli?

A: Yeah.

Q: Did you ever talk to him about seizing voting machines?

A: No.

Q: Did you ever talk to him about anything related to the November election?

A: Yeah. Publicly. I was a reporter and I interviewed him a few times about the election and all that. That was all public. I never had any private conversations with him about it.

Q: And just to be clear, you are not familiar with any phone call that Mr. Giuliani made to him about seizing machines, separate and apart from this executive order issue?
A: I don't remember anything about it, like if -- I don't know. I don't have any recollection of it.

Q: Are you aware of a phone call that John McEntee made to Chad Wolf about possibly seizing voting machines?

A: No.

Q: Are you aware of any effort to contact Attorney General Barr or anybody else at the Department of Justice about seizing voting machines?

A: I remember efforts to reach out to Attorney General Barr, but I do not remember that about voting machines.

Q: Could you repeat that? It was breaking up just little bit. You remember what about outreach?

A: Yeah. Sorry. It's breaking up on my end too. I remember efforts to reach out to Attorney General Barr, but I don't remember them specifically being about seizing voting machines.

Q: Okay. Tell us about those efforts about outreach to Attorney General Barr?

A: I know that they were trying to get a hold of him. That's all I know.

Q: Do you know why?

A: No, like not specifically on the issue but, I mean, he was the Attorney General of the United States, and there was concern that there was election fraud. So I can guess, but no, I don't know.

Q: Who was involved in those efforts to reach Attorney General Barr?

A: I remember at one point Rudy Giuliani wanted to speak with Bill Barr, tried to reach out to him, and I don't think -- to my remembrance, he didn't get through, but I don't know, you know, I wasn't with Rudy all the time. So I don't know if he eventually got through.
Q Do you know if anybody from the legal team did get through to Attorney General Barr?

A Not to my knowledge. I don't know.

Any follow-up there?

Just one quick question. So we can pull it up, if it's helpful, but in the email that General Flynn sent circulating this to Mr. Kerik and Ms. Friess and others; he asked for them to ensure that it gets a legal review.

Do you know who on the Giuliani team would have been responsible for performing a legal review of a draft executive order like this?

Ms. Bobb. Well, Rudy ultimately would have been, but like I said, I don't know that -- like General Flynn wasn't working for Rudy. So it wouldn't -- like I don't know when he says get a legal review, I don't know who General Flynn -- you know, I don't know what lawyers he would have been using. Like they would have had separate a legal team. So I don't know who that is.

Do you know if anyone on the Giuliani team or otherwise did perform a legal review on the executive orders?

Ms. Bobb. No. Like I said, I saw them to the extent that I saw them and e-mailed them out, but I did not do a legal review. To my knowledge, nobody did, but I don't know. To my knowledge, I didn't even know it went past Phil Waldron. Like I thought I stopped at lunch. So I have no idea what happened after that.

Okay.

BY

Q Understand that you don't know what happened after. When you emailed those to Mr. Waldron or Colonel Waldron at that lunch, were the documents -- did they appear to be in a complete or near complete form?
A I think so. I -- I think it was probably pretty close to what you have right there, I think. I don't know.

Q All right. So on December 18, just about two days after the date on those executive orders, there's a meeting at the White House with Sidney Powell, General Flynn, Patrick Byrne, Emily Newman, Rudy Giuliani and others.

Were you at that meeting? Do you know what meeting I'm talking about?

A I think so. Like the business one that was all over the news; yes, I was not there.

Q Okay. It's been widely reported. Yes. Do you know what happened in that meeting?

A No. I remember stories that there was like drama or something, but no. I don't know what happened.

Q Do you know whether this idea of seizing voting machines came up in that meeting?

A No idea. Probably not, but I have no idea.

Q What was the level of interaction that you were having with Sidney Powell, if any, during this period, mid December?

A Minimal. I mean, I was working for Rudy. She was running her team. To the extent they were running parallel paths, I would help her how I could or -- you know. Phil Waldron was working for a bunch of people. So like this EO is a great example. I had a laptop and was willing to take notes on it.

My recollection, that EO is the only time I've had crossover between outside, like people other than Rudy's team but, I mean, we were cordial and friendly but we didn't actually like work together.

Q One person I neglected to ask, I asked about Ken Cuccinelli. Did you ever
have any interactions with Secretary Wolf?

A Yes. Sure. He was Secretary.

Q But after the election, so --

A Oh.

Q -- related to the election and after the election while you were working with Mr. Giuliani's team?

A I don't think so. Oh, yes. I reached out to him about shredded ballots in Georgia. There was a claim of shredded ballots, and I asked him if he knew about it. It was like I think I had a 30-second or less exchange with him and that was it.

Q All right. What did he say to you?

A We are taking care of it. Like basic, he was professional about it, basically like stay in your lane, you know.

Q Is that -- does that have to do with the truckload of ballots or purported truckload of ballots that was taking November 2020 election ballots away from a site?

A Yeah.

Q Okay. Did he ever get -- or did he or anybody at DHS ever get back to you on that issue of shredded ballots?

A No.

Q Did you communicate with anybody else at DHS about the election or the aftermath of the election in that period while you were with Mr. Giuliani's team?

A I don't think so. I don't know.

Q If we can go to Exhibit Number 17. While that's coming up, how about Chad Mizelle? Did you ever talk to him about anything related to the election while you were working with Mr. Giuliani and his team?

A No. I mean, I know Chad because I was worked with him. I was his
colleague. But I don't have any specific recollection of working with him on the election stuff. No.

A All right. So what we are putting up here is a tweet that the President put out on December 19th. It says, Peter Navarro released a 36-page report alleging election fraud more than sufficient to swing victory to Trump, with a hyperlink. Says a great report by Peter. And then at the end there he says, Big protest in DC on January 6. Be there. Will be wild.

Are you familiar with this tweet?

A No. I mean, I can read it, but...

Q Had you ever seen it before we are showing it to you now?

A I don't think so but, I mean, I know the information in it, so it's hard to say, but I don't specifically remember this tweet. No.

Q And at that time, December 18th or 19th, or any period before that, do you remember discussions about a big protest in DC on January 6?

A No.

Q Any discussions about a need to have any kind of protest on January the 6th, at this time?

A I mean, there was the issue of Mike Pence, you know, returning the decision state -- like asking the states to confirm their decision, but I don't have any recollection of any type of protest or anything on January 6.

Q Do you know anything about Maria Ryan reaching out to Mark Meadows to recommend that Mr. Cuccinelli be appointed as special counsel?

A No. I didn't know that happened.

Q On December 19, Mr. Giuliani went on to Steve Bannon's podcast. And this is just after that meeting at the White House and after the executive orders. And he
said, Starting this morning, there's a completely different strategy.

Do you know anything that, what new strategy that the legal team or others were shifting to in this period of mid December?

A       Rudy said that on Bannon’s show?

Q       Correct.

A       It was a completely new strategy?

Q       He said -- I'll read you more of the quote, it's: Starting this morning, there's a completely different strategy. The strategy is going to focus a great deal on some evidence we have about some of these machines that did throw off these states. Over the weekend, I think you'll see different strategies being employed than we were employing before. I also think it's time for Republicans in those states to demonstrate. And I left out certain words and sentences, but that's what he said. Do you know anything about what he was talking about?

A       No. I have no idea.

Q       Do you remember there being a shift in strategy or focus in mid December time frame?

A       There wasn't for me, but I don't know.

Q       Do you remember anybody being more focused on voting machines or the need to get voting machines to do a forensic review or forensic audit of what had happened in the election?

A       That was Sidney Powell was focused on the machines. She was very vocal about that. And Phil was doing work for both, both being Rudy and Sidney. And so it sounds like there was some influence there. I don't know. No. Short answer, no. I have no idea what that was.

Q       So one of the last things I read is that Mr. Giuliani stated on this podcast, he
said, I also think it’s time for Republicans in those states, dot, dot, dot, to demonstrate.

Do you know what he meant by encouraging Republicans to demonstrate?

A    Well, I mean, no.  You would have to ask him.  I know what the word demonstrate means, but no.  You would have to ask him what he meant by it.

Q    Okay.  But just as you sit here, is there anything that from your experience working with him that that means to you, any plan he wanted or effort that he sought?

A    No.  I -- I don't.  I think the point was Republicans needed to, you know, raise their voice and make their position known, but I don't think it was more than that, but I don't know.  You would have to ask him.

Q    If we can go to Exhibit Number 18, please.  So this document is titled, Talking Points and Outline, Executive order 13848, imposing certain sanctions in the event of foreign interference in the United States election.

A    Um-hmm.

Q    Have you -- I understand you only see the top part of this, but do you recognize this document?

A    No, I do not.

Q    All right.  If we can go down to the second half of this document, or the first page here.  It says, Republican leaders, call to action.  Demand complete and total transparency from the November 3rd election.  Encourage the President to use his full authorities under the National Emergency Act, and then a few others.

Do these look familiar at all to you?

A    They don’t.  Did I produce this?

Q    You did not produce this, Ms. Bobb.

A    No, I don’t.  I don’t recognize this.

Q    One of the things I mentioned, understanding you don’t recognize it, and
you can take it down but one of the things it mentions is the need or desire to
appoint a principal deputy attorney general and task force to investigate issues related to
the election.

I’m going to ask you specifically, do you know or ever heard the name Jeff Clark, a
DOJ official?

A No.

Q Do you remember any discussions about elevating someone within the
Department --

A Oh.

Q -- of Justice?

A Yeah, vaguely. Who was he?

Q His name is Jeff Clark. He was the head of the Environment and National
Resources Division. He’s also over civil, DOJ civil.

A Vaguely. Now that you talk about it, I kind of sort of remember that, but
not specifically.

Q Okay. Tell me what you recall.

A I kind of -- I had forgotten about that. Who is -- who was above him?

Q So I’ll tell you after Attorney General Barr resigned, it became Acting
Attorney General Jeff Rosen. And in the deputy attorney general spot, it was Rich
Donoghue.

A Okay. I remember that. I remember Rudy -- or I shouldn’t say Rudy, like
all of us to some extent wanted some assistance from the Department of Justice, you
know, trying to figure out how to solve the problem -- how to solve what we saw as a
problem and not getting much support from within our own Department of Justice.

And I think -- I don’t know. I mean, I don’t know specifics, but I vaguely
remember somebody at the Department of Justice. I don’t know. But I kind of sort of remember what you are talking about, but I wasn’t any -- like I was not in those conversations but kind of. I kind of --

Q All right. I’m going to try to unpack this a little bit to see if anything shakes loose in your memory about it. One of the people he was working with, Jeff Clark, who was over the Civil Division at the time, he was working with a guy named Ken Klukowski who had also worked with the campaign. He was a lawyer. And they drafted a letter that was a proof of concept letter is how they defined it, but it was a letter to officials in Georgia to call for a special session and to look into issues related to the election.

A That doesn’t. Sorry.

Q Okay. We understand that Mr. Clark, Jeff Clark at least knew or worked with Representative Scott Perry.

Do you remember anybody at the Department of Justice having a connection to Representative Perry?

A I do not from my experience. Doesn’t mean it didn’t happen. I’m not trying to say it didn’t happen. I just have no recollection of it.

Q Okay. If we pull up Exhibit 67, specifically page 2. So this is -- if you zoom out just a bit so we can get a bit more context. This is a letter drafted to Governor Kemp, speaker of the Georgia House, I assume, and the president pro tem of the Georgia Senate, talking about the department investigating various issues related to the election, and then calling for a special session, or recommending a special session after mentioning issues related to the legislature’s plenary authority in the Constitution.

A Okay.

Q Does this ring a bell, sound familiar to you?
A Not even a little bit.
Q Okay. You mentioned discussions about the need to have the Department of Justice or desire to have the Department of Justice do more. How would you get them to do more, I guess from your perspective and where you sat?
A We were looking for someone to talk to. Like that's what we were trying to figure out and -- I don't know. Like I'm not aware of any specific requests from DOJ. It was, you know, Rudy's doing one thing, and then it would make sense to have an attorney general or some leadership at the Department of Justice involved. That's the extent to my knowledge. I don't have any more information.
Q Do you know if anybody actually got an audience with the Department of Justice? If Attorney General Barr or Rosen weren't doing enough, did they find somebody that you are familiar with, or just that idea they found somebody?
A I have no idea.
Q Do you remember vaguely something about Jeff Clark and the Department of Justice and needing them to do more; is that fair?
A Yeah. Something like that.
Q Is there anything else you can recall in that topic?
A No.
Q All right. And if you do as we proceed throughout here, please just let us know.

Any follow-up there?
Nothing for me.
If we could go to Exhibit 19, please. If you go down to the bottom, it starts with an email from December the 28th from Doug, slash, Rebbie Mastriano.
Q BY
Q: Do you know who that is?
A: Yeah. Doug Mastriano is the senator of Pennsylvania, state senator.

Q: Did you have any contact with him when you were part of the legal team?
A: I know Doug very well now. I don't know -- I do not think I had any contact with him at the time.

Q: Do you know if Katherine Friess was --
A: Yeah.

Q: -- in contact --
A: Yeah. She was more connected to Pennsylvania than I was, so yeah.

Q: Okay. And if we go up to the next email in the chain, she writes to Senator Mastriano, Mr. Giuliani, Ms. Ellis and you saying, Thanks for the update; and then asks, Any success with reaching out to friendly clerks to get ballot images and/or access to Dominion systems. He responds, copying you, among others, saying, We are working on an assessment of the irregularities on voting in Pennsylvania for POTUS. I'll cc each of you.

Q: Do you remember what this exchange was about?
A: I don't specifically remember this, but it looks pretty straightforward to me. They were trying to find voting irregularities in Pennsylvania, and he said that they were working on it.

Q: Do you know if Ms. Friess -- other than this -- excuse me. Let me start over. Do you know if Ms. Friess made any effort, other than what’s described here, to get access to voting machines in Pennsylvania?
A: I have no idea.

Q: Do you know whether she or Senator Mastriano actually got data from voting machines in Pennsylvania at any point?
Q: All right. If we go to the next email, it's Exhibit Number 20. If you go
down to the first paragraph, it's from Senator Mastriano to Mr. Giuliani, Ms. Friess, Jenna
Ellis and you. It talks about Pennsylvania election data. This is dated December 28th.
And it says, No surprise, but our Pennsylvania Secretary of State is not responding
to inquiries from the Senate. Then it looks like later, a few minutes later says -- Senator
Mastriano says, We made good headway convincing two counties with Dominion
machines in Pennsylvania. We don't have subpoena power until January 5th, so the
counties are voluntary.
And then senator -- or, excuse me, Katherine Friess says, We are standing by to
assist. Appreciate it. Among other things.
A: Yeah.
Q: What else can you tell us, if anything, about the effort to get data from
voting machines in Pennsylvania?
A: I didn't work Pennsylvania. I have no idea. I mean, I can read the email
and opine on what they meant, but I have no direct information about it.
Q: Why were you copied on this, to the best of your knowledge, if you weren't
working Pennsylvania issues?
A: Because I was working with Rudy. And I was doing a lot of work with Rudy.
Katherine was as well, but I think they just knew that I was working with them.
Q: It sounds like though from what you said earlier you didn't have much
involvement on issues related to voting machines?
A: Yeah.
Q: So why, I guess the follow-on question is why copy you on a voting
machine-related issue?

A  Because I am close with Rudy and I was physically, like physically close with
him, like I was often with him. And they probably just wanted to make sure that Rudy
got the information.

Any follow-up there?  Okay.

Q  So I want to focus a little bit more on the state legislatures and your role
with respect to that.

A  Okay.

Q  There's a series of meetings or hearings in the various states:  Arizona,
Pennsylvania, Michigan, in the late November to early December time period.
What was your understanding of the purpose of those meetings?

A  To provide the state legislatures with the information that we had so far.

Q  Do you know why they weren't official legislative action in all places?  You
know some of them, for example, took place in a hotel room as opposed to the Capitol or
a committee room.

A  So in Arizona I know Mark Finchem was running that.  He's in the House of
Representatives.  And Rusty Bowers did not want the meeting held on official grounds,
since the Speaker of the House would not allow it.  Several of the legislatures still
wanted to see the information, so they did it off site.  Michigan was on site.  It was at
the Capitol.

And those were the two that I really worked on.  I don't -- I don't know the other
ones.

Q  What was your role?  You said you worked on them.  What did you do to
help with that?
Like I told you about Finchem. I contacted Finchem. And through our discussion, he decided to do it. And I said I'd connect him with Rudy so they could go out there and do it. So I was doing it all remotely. So it was all done via email and telephone.

Same thing with Michigan. I couldn't go. I couldn't physically do anything with anybody, but I just coordinated as best I could from Washington, D.C., from my home in Washington.

Q: Did you make calls to Michigan lawmakers after the election in November?
A: I probably tried. I don't remember successfully getting through to any of them. I think I talked to their -- a couple staff members, but I don't remember talking -- I don't remember specifically talking to any Michigan legislators.

Q: What about Lee Chatfield or Mike Shirkey, I understand that they had contact with the President and maybe Rudy Giuliani as well?
A: Right. Definitely not Shirkey. Was Lee Chatfield the Speaker of the House at the time?

Q: I will represent to you that he was. Yes.
A: Okay. I may have talked to Lee Chatfield.

Q: All right. Tell us what you remember about that.
A: Not much. I remember talking more to his staff. I couldn't remember the name of who was the speaker at the time. It just, like, it was all totally logistic stuff. It wasn't anything substantive. It was like what room is it going to be in, you know, what time is at; where do the witnesses need to be; so I could get the information to the witnesses to tell them when and where to be. That was it.

Q: Did you help coordinate any calls between the President and members of any state legislatures?
A: I don't know. I have no -- I didn't even know the President at the time. I couldn't do that. To the extent that I did, it would have been through Rudy, you know.

It would have been Rudy doing that.

Q: Were you ever on the phone with Rudy when he spoke with any members of state legislatures?

A: Well, at that point I would think that that would be attorney work product, wouldn't it?

Q: Not if you are on the phone with the state legislator, unless that state legislator is your client?

A: Yes.

Q: I’m sorry?

A: Yes, I was.

Q: Okay. And who do you remember speaking to?

A: I didn’t speak to anybody. Rudy was talking to Rusty Bowers.

Q: All right. Tell me about that conversation.

A: I just remember that Rusty -- there was Rusty Bowers and Karen Fann. And I just remember wanting them -- Rudy -- I don’t -- I don’t remember specifics, but what I think I remember was Rudy wanting to hold a hearing in Arizona, and Bowers was like I can’t, I can’t, I can’t, not allowed, so...

Q: Was he resistant to the idea for a procedural reason or because of the substance of what was expected?

A: I can’t remember today. I just remember him saying, I don’t have authority. I don’t have authority. I can’t, you know, that kind of thing.

Q: And was Rudy upset about that?

A: No. Rudy doesn’t get upset. No. I mean, no, I don’t -- I don’t remember
any, you know, anything specific about it.

Q What about the call with Karen Fann?

A Same thing. That’s why it ended up being in a hotel because they didn’t want to hold it.

Q But you don’t recall specifics of the conversation between Mr. Giuliani and Ms. Fann?

A I don’t think it was -- it wasn’t a very long conversation. Like it was like, hey, we’ve got information we want to present, you know, if you give us a hearing type thing; and they were like, oh, we can’t. We can’t. Nothing we can do. That’s all I remember about it.

Q Did you have any conversations with the representative Scott Perry in the post-election period?

A Not -- no. I don’t think so.

Q I’m going to show you Exhibit Number 22, please. These are text messages. You did not provide this to us, but these are messages that Representative Perry exchanged with Chief of Staff Mark Meadows.

A Okay.

Q And he says, Thanks for doing that. Talking with Rudy’s folks in Philly, they want the Pennsylvania legislative leaders invited ASAP for Sunday or Monday.

It sounds like you weren’t involved too much in Pennsylvania, but do you remember dealing with the Pennsylvania legislative leaders getting invited to the White House?

A No. I didn’t -- I didn’t do that. I --

Q Do you know --

[crosstalk]
A -- at the time, but I didn't do it.

Q Do you know who did?

A Well, based on the emails that we looked at before, I would guess Katherine, but I don't know.

Q Okay. Did you have any role in inviting legislators to the White House?

A No. I had no authority to get anybody to the White House.

Q Do you know why the President met with state legislators, what the purpose of these meetings were?

A I wasn't there. I don't know.

Q Go to Exhibit 23, please. This a document that you did provide, Ms. Bobb. And it's from Representative Finchem to you, Mark Martin, I'm not going to get this name right, Leo --

A Can you scroll so I can see the top of it. It goes from me, up to -- okay.

Q So it starts with Representative Finchem, and then it goes to you and others. It talks about as soon as Chief Justice Martin sends what he has, I'll send to you. And it's about a legal theory analysis. You send it to an email address.

Q Do you recognize the email address you sent it to there?

A Yeah. That's Mirna, Mirna Tarraf. I think that's how you spell her last name. She works the campaign. She was like an admin clerk for the campaign.

Q And then you send the same thing to Mr. Giuliani and Mr. Epshteyn. And if we go to the next page, you can see what you were forwarding on. It's called, A legal theory brief addressing uncertifiable elections, and a memo that apparently Mr. Finchem wrote.

Q Do you remember this?

A Vaguely.
Q: What do you remember about it?
A: That he sent it me and then I forwarded it on.

Q: Is this something -- is it your understanding that Representative Finchem wrote this?
A: I think so. I don’t know. But based on the email and the fact that he’s got his name on the top of it, yeah.

Q: Did he send this to you because it’s something that you had requested from him?
A: I did not request this from him. No.

Q: Do you know why he sent it to you? Did he ever explain it?
A: I don’t remember, but I would guess that it was something that he had been thinking about and wanted to share his thoughts, so he did.

Q: And he first sent it to you on November 21, which is roughly a week or so after you started. Does that sound right?
A: Okay.

Q: Did you know who Mark Martin is?
A: No.

Q: Did you ever learn who that was?
A: Probably. Can you remind me?

Q: Yeah. Mark Martin, he was -- at least the Mark Martin I’m thinking of is a former chief justice of the North Carolina Supreme Court, but I’ll represent to you that on this email it just says Chief Justice Martin.
A: Okay.

Q: And it goes to somebody named M. Martin.
A: Okay.

Q: Did you ever work with him as when you were part of the legal team?
A No. I should say I don't remember. His name wasn't familiar. I don't think I worked with him.

Q On page 2 of this -- well, it says under the plenary authority, retained by legislatures and the Constitution of the U.S., the legislature may indeed call itself into special session without interference from the executive branch and/or judicial branch. Moreover, the legislature has the duty to step in and to either call for a new election or refuse to certify and release the electors to either candidate for President, and even to nullify other office elections that may have been affected by various frauds shown by evidence and testimony so -- to have been so committed.

This hits a little bit on the issue we talked about earlier, I think, but do you remember having discussions about this idea with Representative Finchem?

A Not really. Sorry, I can't see what you were reading. Can you read it one more time?

Q Sure. It is -- I'll just read for you the relevant parts as: Moreover, the legislature has the duty to step in and to either call for a new election or refuse to certify and release the electors to either candidate for President. And it goes on, assuming you can prove fraud. And it's in the -- if you go to page 3, right in there, it's --

A Right. Sorry.

Q Where it says "moreover" in that middle, in the middle there.

A Yeah. I don't know. We didn't specifically talk about this brief.

Q Okay. And even if you didn't talk about this brief, what about the idea that the state legislature could refuse to certify and release electors to either candidate for President; did you talk about that?

A Maybe. I don't have a specific recollection of that, but it could have been in the mix.
Q    Okay. I'll show you something else to see if this helps refresh your
memory, Exhibit Number 24. This is also a document you produced, an exchange
between you and Representative Finchem that you then sent to Mr. Giuliani and Boris
Epshteyn. And it's a memo from Justice Martin and Phil Olson.
A    Okay.
Q    This is called: The Constitutional Duty of State Legislatures in a Contested
Presidential Election.
Do you know why Representative Finchem sent to this you?
A    No.
Q    Do you know who William Olson is?
A    No.
Q    Do you know who Floyd Brown is, the person at the very beginning of this
email exchange?
A    No. Am I supposed to know who these people are?
Q    You tell me. I don't know. That's why we are asking.
[crosstalk]
A    -- I don't know who these people are, and you are like they have been your
best friends since high school, and I'm like, oh, shoot, I forgot. No. I don't have any
recolleciton of who they are.
Q    So in the cover email, Representative Finchem says that you can now release
this memo.
Were you expecting a memo to be able to release to the public or other people
about state legislatures and their role with respect to electors?
A    I wasn't, and I didn't, like I didn't publish this anywhere. I just -- I think I
just forwarded it on, just so everyone received it, but no.
Q Did Mr. Giuliani -- was he expecting these memos from Representative Finchem?

A No. No. Not to my knowledge.

Q If you go to Exhibit Number 25, please. And this is not an email that you are on or that you provided to us.

A Okay.

Q It's from Jenna Ellis to Molly Michael and Mark Meadows. And it says, For POTUS. And then it attaches a memo prepared by John Eastman, called the Constitutional Authority of State Legislatures to Choose Electors.

A Okay.

Q Have you ever seen this memo before, this John Eastman memo?

A Probably. I don't remember specifically, but...

Q And did you ever talk to Jenna Ellis about this memo?

A No.

Q Jenna sends this -- excuse me, Ms. Ellis sends to Molly Michael and Mark Meadows. Do you know who Molly Michael is?

A Yes. She's the President's executive assistant.

Q Did you have any interactions or communications with her in the post-election period?

A Not to my recollection.

Q And Mark Meadows, do you know who he is?

A I do.

Q Did you have any interactions with him in the post-election period?

A I -- sorry. My phone is ringing. Okay. Yeah, one. One that I remember was the phone call, the Brad Raffensperger phone call. I was in Meadow's office with
Rudy, I think Katherine was there. There may have been one other person there, but we listened in on the call from Meadows' office.

Q Had you met him before that?
A No. I don't think so.

Q Do you remember -- go ahead. I'm sorry.
A No. I don't think -- I think that was the first time I met him.

Q Do you remember talking to him before that, even if not in person?
A No. I never did.

Q When you gathered for that call, what was his expectations for the call?

What was the purpose of that call?
A I think to listen and, you know, be available as needed, but I think the whole point was just to listen.

Q Did he say anything about what the President was or was not going to request or seek by this call?
A No.

Q Do you remember if Mr. Meadows expressed any concerns about having this call?
A No. I don't think he did, but I don't remember, but I don't remember him expressing any concerns.

Q Were you able to hear the call that the President had with Secretary Raffensperger?
A Yes.

Q What happened afterwards, when you were sitting there and, you know, the phone is hung up now?
A Nothing. We chit-chatted and left. It was -- it was an unremarkable call.
I know the media has sensationalized it, but none of us thought anything of it. It was just a call and that was it.

Q I mean, the President of the United States asked the Secretary of State to find enough folks to ensure his victory in Georgia. I mean, he used those words, I'm just asking you to find votes.

A That is a gross misrepresentation of the phone call. It was a perfectly fine phone call. If you look at the transcript, he was not asking anything improper. He wasn't asking him to do anything illegal.

There was a lot of indicators of fraud. That's what he was talking about. He was not -- nobody in the room thought there was anything wrong with the phone call. I think it was perfectly fine.

Q So I understand your perspective, but I did want to ask you that, what you just got to is that after the call, did anybody express any concern, reservation, have any thoughts about what had just happened in that call?

A No. But there were a lot of people on the call. Like there were probably at least two dozen, like there was, you know, half a dozen of us in the room, but then there were other -- there were a lot of other people on the call. We knew somebody was going to record it. We knew somebody was going to release it. We knew the media was going to twist it, which was exactly what happened, but nobody was concerned about it. Our concern was, was it a legitimate phone call and did the President say anything improper. And at the end of the call, we all thought no. Like it was totally fine. There was nothing wrong with it. So we didn't think anything of it, and we chit-chatted and left.

Q What about the call in advance made you think that it was going to be recorded and leaked?
Because Donald Trump was on the phone. Because Donald Trump was on the phone and there were other parties allowed on the phone. Of course somebody is going to record it.

Q You said there were about a half a dozen people with you. Who was with you in that room?

A Meadows, Rudy, me, Katherine, those are the ones that I specifically remember. There may have been one or two others, but that was it.

Q Do you know where the President was?

A No. He was not there.

Q He was not in Mr. Meadows' office?

A No. We were not physically with him.

Q Okay. So getting back to the exhibit that prompted this conversation, Ms. Ellis sent John Eastman's memo, early memo to Ms. Michael and Mr. Meadows. Do you have any information about whether they were expecting or requested a memo from John Eastman at this point, which is November 28?

A No. I have no idea.

Q Do you remember any discussions or do you have any information about engaging Mr. Eastman to write a memo about the authority that state legislatures had with respect to electors?

A I do not.

Q Do you know whether the President ever got this memo?

A I don't know. I imagine. I mean, it was sent to Molly and Meadows. I'm sure one of them gave it to him, but I don't actually know.

Q And generally was it your understanding that if you sent something to -- or somebody sent something to Ms. Michael for the President, that that's how you would
get something to the President?

A: No. If it was requested. Sorry. Let me categorize that. If they requested this memo. I thought that was the premise. If this was a memo that was requested, you know, that's how you would get it to him, but I have no idea if they requested it. And I have no idea if they gave it to him.

Q: I see. Okay. If we go to Exhibit 26, please. This is from Sonny Joy Nelson to a few people including looks to be a mailing list of Trump team surrogates about a surrogate call on December the 1st.

Q: Do you know who Sonny Joy Nelson is?

A: She was a scheduler for the campaign.

Q: And this talks about Jenna Ellis and Jason Miller being on this call in some of the bullet points.

A: Yeah.

Q: It says, our legal and recount efforts are proceeding on two separate tracks. Then the next black bullet point down says judicial track, mentions a few lawsuits. And then it goes down to nearly the bottom of the page, and keep going, right there, that black circular bullet point says state legislature track.

Q: Is that your understanding of generally the tracks that are -- that were challenging some of the results in the election at that point, both the judicial and state legislature track?

A: Yeah. I don't know how else you would do it. Yeah.

Q: Do you know who prepared these talking points?

A: No idea. I've never seen this before.

Q: And just above that state legislature there's a black square bullet point says, these elections have been irredeemably compromised and the matter should go to the
state legislatures.

Having worked where you worked, and did what you did, what was your understanding of what this says, that the election should go to the state legislatures?

A I don't know. I don't know who wrote this. Based on the fact that it's coming from Jenna Ellis and Jason Miller makes me think that these are like media talking points, but I have no idea.

Q And this talks about the state legislature track or strategy. Do you know who came up with the state legislature track as a focus for the campaign in the post-election period?

A No. I mean, like I said, I just called Mark Finchem. I don't know.

Q And forgive me if I asked you this before, but was that one of your assignments, like reach out to state legislatures when you get here, hit the ground running by doing that?

A No, it wasn't. That's why I'm saying, like, talking points make it look nice and organized and all that, and that's great, but like we were all just trying to do what we could to figure stuff out. So I don't know.

Q With the hearings that occurred in the state legislatures that we talked about little bit --

A Yeah.

Q -- were one of the purposes to get the state legislatures not only to understand what you and the legal team thought was out there, but also to take some action with respect to electors or otherwise?

A I don't -- I don't know. We did not have time to come up with, like, a fully developed strategy. We are talking about days. Like none of us expected what we saw. And so this was not like a let's, you know, let's have a strategizing session and sit
around and talk about it. This was everyone just trying to do what they could to get everything.

I don't think that there was a specific, like, hey, if we get the legislators to do this then, you know. It wasn't that way.

Q Do you know why Mr. Giuliani was -- made a decision or just wasn't sworn in at these hearings?

A No. I don't know.

Q Did you hear that the legislature or a legislator tried to swear him in but it ultimately didn't happen and he testified without being sworn in?

A No. But usually attorneys aren't sworn in. So why would he be sworn in.

Q Well, I think they tried to swear him in because he was the one presenting evidence as a witness. But you don't know anything about why he was not sworn in?

A No. I don't know anything about it but, I mean, attorneys present evidence in court all the time and they are not sworn in.

Q At the November 25th hearing, which I believe was in Pennsylvania, Mr. Giuliani said, among other things, that Pennsylvania had received more mail-in votes than it had sent to voters, meaning more mail-in votes than mail-in ballots.

A Yeah.

Q Do you remember that?

A I remember that fact. I believe that fact is true. I don't specifically remember him saying that.

Q I understand that you weren't necessarily working in Pennsylvania. I think it's since been determined that Mr. Giuliani confused the number of ballots sent in the primary and the general elections.

Do you remember any discussions about walking that back or correcting the
record that Mr. Giuliani --

A No.

Q -- made in Pennsylvania?

A No. There were more votes than voters in Pennsylvania. Like several groups have looked into that. And that is -- as we sit here today, I believe that's a true fact. So I don't think he would have had to walk anything back.

Q Okay. And this is specifically what I was talking about was mail-in votes and mail-in ballots and comparing those two, but --

A I don't know the specifics of what you are saying, but okay.

Q So also around this time -- well, let me just pause to see if anybody has any questions.

Nothing for me.

BY

Q On December 14, a number of Trump electors met and cast Electoral College votes for President Trump, despite the fact that the state had certified those votes for President Biden. I'm going to refer this as kind of the alternate elector strategy, but does that make sense to you? Do you know what I'm talking about?

A Yeah. It was the same thing that they did I think in Hawaii in 1960. Because the law requires the electors to meet on December 14th or whatever day you say it was, there was still -- they were still challenging -- there were still two or three weeks or whatever to challenge the results.

So in order to be as compliant with the law as possible, you would have had to have your ultimate slate of electors meet on that day. They were open. They didn't do anything fraudulently about it. They signed their own names. It's not like they made something up.
They did what they were purporting to do. Yeah, I know that. And I think it happened in a couple different places.

Q Okay. You mentioned a 1960 example. Is that something you researched before --

A I didn’t research. No, I did not research it.

Q Okay. Is that something you have ever researched since then?

A No, which at this moment I wish I knew more about it, because I could sound better, but no. I know it was something that happened and they were replicating that. That’s all.

Q Okay. And when did you first hear about this idea of having the Trump electors meet, even though the state was not called for the President, President Trump?

A Shortly before, probably a day or two before.

Q Had you heard about it earlier, like in November when you joined the legal team?

A No.

Q Do you remember where you heard it from or from whom?

A No.

Q Earlier we asked you about somebody named Ken Chesebro.

A Yeah.

Q And just remind me, were you familiar with him with respect to this idea of having Trump electors meet and cast votes in states that he had not won?

A I was not familiar with him. No. He could have, like he could have been the one -- I have no idea. Like I don’t know who he was or what role he played.

Q Did you work with anyone in the White House to implement this, I’ll call it a strategy, but have the Trump electors meet and cast votes?
No. I didn't work with anybody in the White House I think on anything.

Oh, no, Peter Navarro, we shared information but, no, that was it. I didn't work with any --

Go ahead. I'm sorry. I cut you off.

No. I didn't work with anybody else. No.

Do you know if anybody on the legal team worked with folks in the White House on this issue?

I don't think anybody did, but I don't know.

What about the RNC, did you or anybody on the legal team work with folks at the RNC to make this happen, get the Trump electors together and cast their votes?

So, because I wasn't part of the RNC or the campaign, I don't necessarily know who was who, but I think I worked with people from the campaign to do this. I don't know who's RNC and, you know, who's not.

And what was your role and who did you work with then?

I didn't really have a role. I knew it was happening, and I think they -- I didn't do really anything on it. I think I maybe -- what did I do with it. I was on call, I think. I don't know. I think I was available if anyone needed information or something, but I didn't actually do anything on it.

Did you help coordinate meeting sites or groups of people to get together at all?

I don't think so. I mean, like I said, for Arizona, Michigan, and New Mexico I would have been the point of contact. So if any of them, like the people in those states had questions, they might have reached out to me, but I don't specifically remember like coordinating this.

I remember being on the call. I remember being aware of it happening, but like I
couldn’t have coordinated the sites because I wasn’t there. Like I was in Washington, D.C. So I wouldn’t have known where to tell them to go or anything. So I wasn’t coordinating the logistics from that end, but I probably was a point of contact if anybody had questions for like Rudy’s team, but I don’t think -- I don’t think anyone contacted me on that. I don’t know. I don’t remember doing anything specific about this, but I was aware of it and I knew it was happening.

Q Without getting into the legal research or conclusions, if any, did you do any legal research related to this issue of having the Trump electors cast votes?

A No.

Q So I do want to get to that call. Tell us about the call you remember being on related to this issue.

A I don’t remember. I think it was Arizona and possibly New Mexico, and I couldn’t tell you -- I’m sure there’s a calendar invite somewhere, you guys might have it, with the names of the attendants. So I do not remember who was on the call, but I listened and it was coordinating people, telling them where to go and what they were going to do and whether -- I think it was one of the states they were trying to coordinate was like the Speaker of the House to say, hey, let them know this is what we are doing. And they didn't want them there, so they decided to meet outside because they were trying to be respectful of the process because they wanted to follow the law as closely as they could, so that type of stuff.

And they decided the easiest way to follow the law, and they all came up with the logistics of the when and where, which I couldn't tell you what it is because I’m not from those places. Yeah. That was it.

Q There was -- I’m familiar with at least two calls that occurred on it was a Saturday, December 12th, so about two days before the Electoral College met and cast
votes. Does that sound familiar? Do you think this was a Saturday call potentially?

A It might have been. I don’t know. Every day felt -- morning, so I don’t know.

Q And do you remember Mr. Giuliani being on that call?

A He was not on the call.

Q Who was on the call from the legal team?

A I don’t know. That’s why I was saying hopefully you have a calendar invite that somebody produced, because whoever was on that, like I was on probably -- I was probably Rudy’s representative, but...

Q And you said earlier that you didn’t know because of the breakdown and where things were, whether somebody was campaign or RNC, but you remember working with somebody on this. Who was it that you remember working with, and what was their role?

A I think -- I think Mike Roman may have been part of it, but I don’t know. That’s why like do you have -- if you have a calendar invite with the organizer, that would be helpful to know, but I don’t -- I don’t know names or anything. They were people that I hadn’t really worked with before. I didn’t know them.

Q Talk to me about Mike Roman. What do you remember him doing, if anything, with respect to these electors meeting and casting votes?

A I think he just coordinated -- because he was like I want to say operations coordinator I think for the RNC, maybe for his campaign. I don’t know. And I think he was just coordinating the GOP, like the state GOPs. I don’t know. I think he was just the one that had the contact information for everybody, but like it had to be people on the ground coordinating it because we are not there, you know, but I don’t know.
Q: So some of the alternate electors declined to participate or decided not to participate in the process. Are you familiar with any of the electors who decided not to do this?

A: I don't know who they were, but I know some of them didn't do it.

Q: Did anybody reach out to you to talk to you about concerns they had about this process?

A: No.

Q: Were there any discussions that you were familiar with about revising language in the electoral certificates to make them more conditional, like dependent on the state legislature deciding to do something or courts deciding to do something?

A: I have never heard that. That's the first time I've heard that.

Q: Do you know if John Eastman had any role in coordinating the alternate electors?

A: To my knowledge, he did not, but I don't know. I -- I was very limited involved myself, so who knows. Maybe he had a really big role and I didn't see it, but I don't -- I don't think he was part of it.

Q: Do you know if the President was aware or involved in the alternate elector plan?

A: No idea.

Q: You don't know, just to be clear?

A: I don't know. I believe he was not, but I don't know.

Q: You never discussed this with him?

A: No.

Q: All right. We can go to Exhibit 29, please. This is a document from -- it's a memo, rather, from Ken Chesebro to Judge James Troupis.
Do you know who James Troupis is?
A Yes.
Q Who is that?
A He's a well-respected attorney in Wisconsin.
Q Did you work with him at all or communicate with him at all after the election in November?
A No. Not in this time frame. I have since, but not in this time frame.
Q Have you ever seen this memo before by Ken Chesebro to Judge Troupis about the deadline for setting a state electoral votes and having alternate electors cast votes for Donald Trump?
A I don't think so. It doesn't look familiar. Maybe. I don't know. I don't remember seeing this. It's possible.
Q You say maybe. Do you remember seeing any memo justifying or talking about the legal basis for alternate electors meeting?
A No. I don't remember any memo. I mean, I know people were talking about it, but -- it's possible I got this, but I don't specifically remember. Did I produce this?
Q You did not produce this. You said you remember people talking about it. Who are the people that you remember talking about this idea of alternate electors?
A I mean, this was -- this was the new cycle, right? Like what's the safe harbor deadline. What's the law say that electors have to vote, you know, like when's the -- like all of this was the discussion at the time. I remember that, but I don't have a specific recollection of this, but it is possible I saw it.
Q If we go to Exhibit 30, this is another memo, different memo from Ken Chesebro to Judge Troupis. This one is dated December the 9th, talking about statutory
requirements for the alternate electors. And then if you go to page 3 of this exhibit, it
talks about various state law statutory requirements.

A Okay.

Q It goes through Arizona. In the third paragraph in that, Arizona says, one

concern is that if one or more electors are absent from the meeting, is there a procedure

under Arizona law for filling vacancies. And then if you look at some of the others, in

Michigan it talks about various issues there and in Nevada.

Do you remember anybody raising any concerns about being able to follow state

laws with these alternate electors meeting and casting votes for Trump?

A Yeah. I mean, that was whole point of it. Everyone wanted to make sure

that they were following the state law, because if we were able to success -- you know,

have some type of successful procedure before January 6, we needed to have followed

the law. So the whole point of the effort was to make sure that we were following the

law.

Q And in Nevada, I know you said earlier that you did some work in Nevada,

but in this memo, if you go to page 4, under paragraph D right there it says, Nevada is an

extremely problematic state because it requires the meeting of the electors to be

overseen by the secretary of state, who is supposed to -- who is only supposed to permit

electoral votes from the winner of the popular vote in Nevada because of faithless

electors issue.

So do you remember this coming up in Nevada? I mean, that Ken Chesebro is

writing this memo about complying with state law, says that it's extremely problematic to

do this in Nevada?

A I don't know anything about this.

Q And I know you said earlier that there was a focus on wanting to do this in
compliance with the law, but just to be clear, do you remember any concerns that people
raised about not being able to follow the law at all and what to do then?

A No. The understanding is that we were following the law. And that's why
they had reached out to -- it's my understanding they had reached out to like either the
local speakers of the House, whatever, to coordinate with them. And to the extent that
they wouldn't allow them or whatever, they -- I think they did something else. I don't
know.

They get as close as they could to compliance that --nobody was like, hey, let's go
break the law. That didn't happen.

Q So your understanding though, and based on what you saw, what you heard
is that people did think they were complying with the laws in casting these alternate
electoral votes?

A Yeah. That was the whole point. Because if they didn't cast them on this
day, or whatever day it was, then they wouldn't have been able to do it, you know, a
week or two later. If we had a successful court ruling or something come up, we would
have been out of compliance with the law, which is why they wanted to do it this way.

Q So then are you surprised then to see this, to see a memo saying that, you
know, like Nevada can't follow the law unless the secretary of state is there to watch the
votes being cast?

A No.

Q Which didn't happen?

A I understand why you are reading it that way, but quite honestly I think
you're reading into it what you might want to read into it. When I read this, I see it's
problematic because we have to get the secretary of state to oversee what we are doing,
and the secretary of state is a raging liberal who is not going to do it, so we will be
unsuccessful.

That’s the way I read this memo. I don’t read it as it’s problematic; we are going to have to break the law to do this in Nevada. That’s not the way I read this, and I don’t think that’s the way the intent of it, but I don’t know. You’ll have to ask whoever wrote this.

Q And until today, you had never seen this memo though, right?
A Correct.

Q Okay. And until today, do you remember discussing this memo or the specifics of this memo like what you just mentioned with anybody on the campaign or outside the campaign, the electors themselves?
A No. The only thing I know about this memo is what you just showed me. And I can tell you whoever wrote this memo, the way I read it, it’s not problematic in the sense that we are going to break the law. It’s problematic because we won’t be successful.

Q Okay. Understand your reading there. If we go to Exhibit Number 31, if you go down to the email there that we are getting half of, yeah, right there. Mr. Chesebro on December 10 sent an email to various folks in the Nevada Republican party including Michael McDonald and Jim DeGraffenreid.

Do you know who those people are?
A I know Michael McDonald.

Q Did you ever talk to him about the alternate electors and casting votes for Trump in Nevada?
A No.

Q So, in this email Mr. Chesebro says that Mayor Giuliani and others with the campaign, including Justin Clark and Mick Trainer, asked me to reach out to you and other
electors to run point on the plan to have the Trump-Pence electors in all six contested
states meet and transmit their votes.

Do you -- are you familiar with Mr. Giuliani's directive to have Ken Chesebro reach
out to the electors in the six states like it says here?

A    I'm not familiar with it. I know it happened. I know the electors met.

So somebody coordinated it, but no, I don't know.

Q    You can take that down. Thank you.

I think you mentioned this before, but what was your understanding of the reason
for doing this?

A    I told you, because they wanted to be in compliance with the law in the
event that we either had a successful court ruling or some other event came up to legally
question the results of the election. We were trying to be in compliance, as close to
compliance with the law as we could.

In order to do that, we have to have your electors meet on December 14th or
whatever day it was. So it was an attempt to be in compliance so that we could
preserve a remedy for a favorable court ruling.

Q    And you mentioned court -- a favorable court ruling or some other event.

What other event could trigger these being effective?

A    I have no idea. Anything that would have called the election into question.

I mean, it was a novel issue that we were raising to try to solve, like it's nice that you now
had two years to sit and think about this, but at the time we are putting out a fire. I
don't know.

We didn't know then, and I don't know. But the whole point is the obvious one
is that we had a favorable court ruling. Could something else have happened, I don't
know, maybe, possibly. That was the whole point. It was a novel issue. We didn't
know what was going to happen.

So in order to preserve the ability to have another slate of electors to use, they would have had to meet at this time.

Q  What about state legislators, could they do something that would make these alternate votes somehow effective as you understood it at the time?

A  I have no idea. Yeah, why not. State legislators can pass a resolution if they want to. It's never happened. It's a novel issue, as I've said four or five times now.

All of this is novel, so I can't sit here and tell you precedent or tell you statutory rules. I don't know. But I also think -- I think people were looking for solutions at this time. And in order to keep all of the doors open, they were trying to comply with the law.

Q  Are you aware of any discussions about the need to do this, meaning have alternate electors cast votes for then President Trump in order for Mike Pence to have some ability or authority to take action on January 6th in the joint session of Congress?

A  I think there's separate issues. But, no, I don't -- I don't think the -- the whole alternate slate of electors things was preserving remedies. So, for example, we had a favorable court ruling. Somehow something -- somebody ruled that, you know, the Biden electors would get pulled back. You have to have -- the remedy would be to then award Trump electors. But if you don't have a slate of Trump electors, there's nothing for the court to award. So you have to preserve the remedy.

So the whole point of this exercise was to preserve the remedy, whether it was through the court, whether it was through legislature, I don't know. But it was -- it had nothing to do with Pence taking any action. It was just preserving a remedy in the case that we could somehow use another slate of electors in some fashion, but we had to -- it
had to exist.

Q  Do you remember any discussions about Congress being able to do

something with these alternate slate of electors during the joint session, if a court or a

state legislature didn't do anything?

A  No. I don't think so. I don't think that they went to Congress. I think

they -- I don't think they were submitted to Congress, were they?

Q  I will represent to you that they were. They were sent to Congress and the

Vice President as president of the Senate.

A  Oh, I don't know about that, so I have no idea.

Q  Okay. So you weren't familiar that these --

A  No.

Q  -- went to Congress at all?

A  I didn't even know they went. I thought they were held and reserved, but I

didn't know they went.

Q  Okay. Then I assume I know the answer to the next question, but I don't

want to assume. So you didn't have any role in telling alternate electors to send their

votes to Congress or the National Archives or the President?

A  I did not know that. No.

I just want to make sure I understand what you were

understanding at the time. So say in the event that, you know, it's January 6th. A
court has not ruled on the question of which slate of electors is the valid slate of electors.
A state legislature hasn't taken any action to find out Trump's slate of electors.
Is there any valid way for those other slates of electors to have been considered or
used or certified or anything if one of those two things had not happened?

Ms. Bobb. Not to my knowledge.
Okay.

Q  So at some point mixed in, not necessarily in order chronologically, but mixed in in there were efforts or calls to have states decertify the certified results of their elections.

Are you aware of those efforts?

A  Not at the time frame we are talking about. I mean, I am aware of them -- I thought that became a thing at the Arizona audit, which was months later. I'm not aware of that happening in the time frame you are talking about.

Q  Okay. And the time frame, just to be clear for the record, between the election day, November 3, through January 6, 2021?

A  Correct.

Q  Earlier we talked a little bit about members of Congress. I do want to get into that a little bit more. Do you remember or recall a December 21st meeting in which President Trump and Vice President Pence met with members of Congress to discuss January 6 in the joint session of Congress?

A  Nope. I would have had no knowledge about that.

Q  Okay. Do you remember any meetings that you were in or heard about involving members of the House Freedom Caucus or any other member of Congress for that matter related to January 6 and the joint session of Congress?

A  No. I don’t know anything about it.

Q  Pull up Exhibit 34, please. We’ve been going for about an hour and a half. If you want to take a quick comfort break too, just let us know. We are happy to do so.

A  I’ll want to take a break in a little bit, but as much as I’m enjoying this, I would really just like to get it over with.
Q: Understood. Just let us know?
A: Okay.

Q: This is Exhibit Number 34. This is a text message that Representative Hice sent to Mark Meadows on December 22 following apparently a meeting on the 21st. Representative Hice says, Three quick things: Thanks for making the meeting happen yesterday. I thought it was productive. When Rudy says he needs one more thing from Georgia, what does he mean. I’m reaching out to Georgia folks for help, but need more specifics. Who can I contact on Rudy’s team.

[Redacted] And you can take that down now.

Q: Do you know or did you ever have any communications with Representative Hice?
A: Not at that time. I have interviewed him as a journalist like April, May, June, time frame, but no, I did not know him at the time.

Q: And at that period, so December 22 was the message, but around that time do you know if Mr. Giuliani had any desires, what the one more thing he wanted to get out of Georgia was?
A: No idea.

Q: Another person who has mentioned meetings with Mr. Giuliani includes then Representative Elect Marjorie Taylor Greene.

Did you have any interactions with her or her staff related to the election?
A: Never.

Q: All right. If you can pull up Exhibit Number 36. This is not a document that you provided to us.
A: Okay.
Q We obtained it from the National Archives, but this is from Bernie Kerik to Mark Meadows, chief of staff. The subject is: Giuliani team strategic communications plan V1, and with the attachment, the same thing. In it, Mr. Kerik says, Dear Mark, I know the mayor sent this to you last evening, but wanted to emphasize the importance of timing. We need to pull the trigger today. We are estimating it's going to run between five to eight million and will bring in Mike Glassner and Mark Serrano to put it under the mayor's supervision.

And I'm ad libbing a bit here, summarizing. Said there's only one thing that's going to move the needle and force the legislators to do what they are constitutionally obligated to do, and that is apply pressure, specific pressure in targeted areas. This plan does that. And says we can do all the investigations we want later, but if the President plans on winning, it's the legislators that have to be moved.

And then if you look at the attachment which is Exhibit Number 37, it's something called The Strategic Communications Plan, Giuliani Presidential Legal Defense Team. We have 10 days to execute this plan and certify President Trump.

Do you recognize this strategic communications plan?

A Yes and no. I remember -- I don't remember it coming from Bernie. I remember Katherine working on something, but I -- I wasn't a part of it, and I don't think I saw it. I feel like I have seen this cover page thing that we are looking at but, yeah, I don't know. I don't know anything about it.

Q Okay. And we'll go through some of it, but you don't remember working with Ms. Friess on creating this document?

A No. I definitely didn't. I did not work with her on this.

Q We can go back to Exhibit 36 which is the cover email for this. Mr. Kerik is writing this on December the 28th and saying there's only one thing that's going to move
the needle and force legislators to do what they are constitutionally obligated to do, and
that’s apply pressure.

So can you tell us just the sense of what was happening around that time with the
legal team and getting to the point that Mr. Kerik mentions, which is if the President plans
on winning, then we need to move the legislators?

A  I have -- I have no idea.  You'll have to ask him.

Q  Do you remember any conversations about the need to apply pressure to
specific people or groups of people at that time?

A  No.  No.

Q  And if we go back to 37, which is the attachment, the timeline for this is
December 27 through January 6, which corresponds with the joint session on January 6.
Do you recall there being a focus on January 6 after the electors had met and cast
votes and President Biden was declared the President Elect at that point, I mean, was
there a focus that January 6 was the next time that anything could happen with respect to
the election?

A  No.  We were not focused on it.  I mean, maybe Rudy or the other team
members are.  I wasn’t focused on it.

Q  What was your focus in that period after the 14th of December?

A  January 20th, because that was when Trump would be out of office.  And
so I thought, like, I mine, I was just like, well, I'll just fight until he's out of office, you
know, try to investigate and figure it out and, you know, look for stuff.  So January 6 was
never -- obviously it was a big day in the sense that was the day Congress was meeting,
but in my mind as far as like the investigation goes, it was never an end date, so...

Q  Did you think that after the December 14 meeting of the Electoral College
anything could be done at that point to change the fact that President Biden would be
assuming office on the 20th?

A Yeah, I did. I still do, but it didn’t happen, so...

Q What do you think could have been done between December 14th and January 20th?

A I think Mike Pence could have sent the votes back to the states and just --

Q Okay. So --

A -- confirmed their certification or, you know, I think he could have said -- I think Mike Pence could have done something. I think he has more authority than I would say the liberals read into it. But he chose not to, and so the issue never materialized.

Q Did you have any role in researching that, his authority on January 6 as president of the Senate to take some action like that which you described?

A No. I mean, I wasn’t his lawyer, you know. I was investigating the issues with the election. I was not Mike Pence’s lawyer. I had never spoke with him, I never advised him on anything. I had nothing to do with that. That was just my own -- for myself and my own, you know, thoughts about it. I thought that he had the authority to do it.

Q So, in this document, if you scroll down just a bit, the focus of this strategic communications plan, as it says there focus of campaign or swing state Republican senators from Arizona, Georgia, Michigan, Nevada, Pennsylvania, and Wisconsin, as well as Republican members of the House and Republican members of the Senate.

So this looks to me like federal members of Congress as opposed to state members. Do you know if that’s an accurate characterization?

A I have no idea, anything about this document.

Q Okay. This document, if you scroll down just a bit, it references multiple
issues. It talks about dead people voting, underage people voting, goes on to Dominion voting machines and other allegations related to the election.

Did you help compile information for Ms. Friess around this time?

A No.

Q So late December while she was -- may have been working on this?

A No.

Q No?

A No.

Q Do you know who Mike Glassner is?

A Yeah. I think he is a political campaign guy. Sorry. I don't know what you call those people. I never worked the campaign but, like, he works campaigns.

Q Okay. Did you work with him in the post-election period?

A No. I met him like three weeks ago randomly, but no, I don't know.

Q What about Mark Serrano, do you know who that is?

A I do know who he is. I don't know him personally. He is like a media PR. I don't know if he owns his own company or if he works for a company or something, but I think he does advertising, political advertising.

Q Can we go to page 6 of this document. You go down to key team members. I'm hoping you might be able to help me, Ms. Bobb, identify some of these initials based on your work with the team. So it says Rudy Giuliani, know who that is, but plan run by BK and KF. Do you know who BK or KF would be?

A Bernie Kerik and Katherine Friess.

Q What about media advisors SB and BE?

A Boris Epshteyn. SB.

Q Could that be Steve Bannon?
A Oh, yeah, could be. I don't know if that's who it is, but it could be. The initials match.

Q Did you ever discuss anything or meet with Steve Bannon in the period between the election and January 6?

A I met -- I met Steve Bannon maybe once or twice just with Rudy. It wasn't like a formal thing, like we were having lunch or dinner or something like that, but nothing formal.

Q Did you discuss the election?

A Probably. I mean, everybody was discussing the election, but I don't remember a specific like, you know, there's no specific agenda with him. It was just kind of what are your thoughts, what do you think about it, that type of thing.

Q Did you discuss January 6th with him, the joint session of Congress or the rally on January 6th?

A No.

Q During any of those discussions was Mr. Bannon making suggestions about potential steps that could be taken in any way related to the election?

A Possibly, but it wouldn't have been any different than any of us, you know, just kind of spitballing, like what can you do, what's possible, what's not possible. Probably. I mean, we probably had those discussions but, like I said, he wasn't like there wasn't like a specific agenda.

Q Right. That does make sense. Do you -- even understanding that it was sort of spitballing, do you recall any of the ideas that he had?

A No. I remember him asking me specific questions about like do you know how many dead people voted? Do you know were there juveniles that voted, like the statistical research? I remember him asking me those questions, but I don't
remember -- like I don't remember him saying anything. I remember him like asking me that, but he didn't like say you need to do this or -- you know.

I'm sure he did, like maybe he and Rudy talked about stuff, but with me, I -- I don't remember anything specific that he was -- you know. He wasn't like trying to do something.

Q Got it. All right. So continuing through this Exhibit Number 37, it says research team, CR and SP. Do you know who that would be or those would be?

A No.

Q Do you know who Chanel Rion is?

A Oh, yeah. That one.

Q How about SP, could that be Sidney Powell for the research team?

A It could be. I don't think -- I don't think Bernie and Katherine were working with Sidney, but maybe.

Q What about influencer outreach, TF. Do you know who that is?

A Gosh, this is like a puzzle. Influencer outreach. No. I don't know who they are.

Q Tech team is PW?

A Phil Waldron, I would assume. I don't know. I don't know. If you are asking me to guess what these initials are, that's what I would guess, but I don't know.

Q This influencer outreach, are you aware of any conversations, recommendations, suggestions to use social media or the internet to put out, you know, allegations related to the election?

A No. I remember Bernie and Katherine, this was something that they wanted to do. They were talking to Rudy and apparently Mark. I don't know who they were talking to, but this was their thing obviously. And they were keeping it like super
tight under wraps, so I was not -- like I was expressly excluded from these conversations.

So I don't know, but I don't know what they wanted to do.

Q Do you know why you were excluded?

A I think they just wanted to keep it small because, you know, the less people that know what you are trying to do, less likely it's going to leak, but I don't know.

Q Was it viewed as controversial? I mean, I guess just help me understand why --

A I don't know. I don't think there's anything controversial about it, but I don't know.

Q While we are on this issue of social media influencers, there are several sites that talked about fraud in the election. I mean, it's all over social media, Twitter, otherwise too, but there are some sites that I guess focused on a little bit more than the others. One is called The Donald Dot Win.

Have you ever heard of that website?

A What's it called?

Q TheDonald.Win.

A No, but I can't wait to see it. Do you have it?

Q Patriots.Win; are you familiar with that?

A No.

Q Do you remember anybody ever mentioning those websites to you?

A No, but they sound amazing.

Q How about there's a Reddit site for a while, it was a Reddit board called The Donald. Were you familiar with that?

A No. I mean, I'm obviously familiar with Reddit but, no, I don't know what that site is.
Q If we go to the next page, page 7 of this strategic communications plan, it talks about rallies and protests, and it says, organize events in six states where the targets were protests at local officials' homes and offices, protests at governors' mansions, protest at Secretary of State's home, protest at weak members' homes, protest in DC, rally for key House and Senate members.

Do you remember discussions about the need to have protests in various places including in front of elected officials' homes or in Washington, D.C. in this period late December?

A No. Like I said, on this media strategic plan or whatever it's called, they were very quiet about it. So I don't know.

Q If we go to Exhibit 38, this is an email from Doug Mastriano, Senator Mastriano to Ms. Friess, Mr. Giuliani, you, Ms. Ellis. And it's about letters to Senator McConnell and Leader McCarthy. This is from December 31. And in it Senator Mastriano attaches letters to both of them, McConnell and McCarthy, asking that they dispute the Pennsylvania election results, and says they are signed by my colleagues in the Pennsylvania House and Senate.

Do you remember this, getting letters from Senator Mastriano or others asking members of Congress to dispute election results on the January 6 joint session of Congress?

A Yes. I think so. Is this the letter where they are asking for their electors back?

Q You go to page 2 of this exhibit.

A Yeah.

Q Okay. What was your role or the legal team's role, if any, in getting these letters, drafting the letters, requesting the letters, anything at all?
A: My role was not -- I didn't -- I don't think I had any role. Particularly with Pennsylvania one I had -- I know I had no role in this. I had no idea if anybody else did or not.

Q: Did you -- did you in your capacity with Arizona or Nevada or any of the other -- Michigan, the other states that you worked on, have any role with respect to letters to the Vice President or members of Congress about the joint session?

A: I don't remember specifically. I may have mentioned it to Mark Finchem. Like once I saw this, I may have said, hey, get somebody into this; does Arizona want to do it. But like I don't specifically remember asking him to do that, but I may have.

Q: Do you remember encouraging him to do something like this?

A: No. Like I said, I could have. It wouldn't have -- if you interview him and he says, Oh, Christina called me and asked me to do it, that very well could have happened, but I don't specifically remember doing it.

Q: Did you think or others on the legal team think letters like these were important for the joint session on January 6?

A: Yeah, I think so. I think -- I think they are important anyway, whether it's January 6 or not. I think it's important to object where appropriate.

Q: And in this letter, specifically on page 3, it says, They are asking for more time in delay certification of the Electoral College to allow due process as we pursue election integrity in our Commonwealth.

Is that what you were referring to earlier when you said that Mike Pence could have or joint session could have delayed certification?

A: Yeah. Just give them the time to look into whatever they are looking into to make sure that they are satisfied that their state sent the right electors. Just because it gives them more time doesn't mean that they are going to change their vote. It just,
like, it's up to the state legislatures.

It's not -- there's nothing a legal team can do. There's nothing Mike Pence could have done as far as like switching electors, I don't think. Maybe. I don't know. I didn't get into that, but I do think he had the authority to give them more time to look into it.

Q At this point -- go ahead. I'm sorry.

A No. That's okay. That was it, just to look into it. I think he could have.

Q So by this point, you know, this is dated January 4th, it's been two months since the election. What was the view that, you know, another 10 days could actually matter? I mean, they have had two months to do something. They have been fielding calls to look into it.

The hotel hearings and other hearings took place in late November and early December. Why an extra 10 days at that point?

A You have to ask them. I don't know. Were they planning on calling themselves into session? Were they -- earlier I think you showed me an email where he said we can't do anything until January 5 because of some Byzantine rule. So I'm guessing there was a procedural issue where they couldn't do anything until January 5.

So he's saying let us call ourselves into session. I don't know. I mean, you are asking me to guess. I have nothing to do with this. But based on other information you have shown me from Doug Mastriano, that's what I would suspect is procedurally they had to wait until the 5th before they could do anything, and they wouldn't have it done before the morning of the 6th. So give us time to call ourselves into session and reconsider this. I don't know.

Q You are right. We did look at an email earlier where Senator Mastriano referenced a rule about subpoenaing Dominion machines or voting machines, something
to that effect.

[crosstalk]

Q I think we missed that, Ms. Bobb. I'm sorry.

A I said so this letter appears to me to be asking for time to do an investigation.

Q Okay. And ultimately there's a letter, and we have it here, we can show it to you, but a letter signed by representatives from I think all of the six states in play referred to as the contested states. You are talking about something in Pennsylvania.

I guess what would the extra time do for those other states in your opinion? I mean, you thought it would be helpful too, I think you testified earlier?

A I know. I do think it would be helpful. I don't know what the procedure and rules of every state, but if the state legislators were asking for it, obviously they saw some value in the opportunity to confer with their colleagues and determine if they needed to make a correction or if they could make a correction. I don't know, but it would have been up to the state legislators.

Q And did you say you recall receiving other letters like this from Representative Finchem or otherwise?

A I think that --

[crosstalk]

A -- before, I think -- Pennsylvania, Wisconsin, Arizona and Georgia all sent letters, I think.

Q And what did you do with those letters, to the extent you did anything after you received them?

A I didn't do anything with them. They weren't sent to me. I mean, I
probably have copies of them, but they weren't letters to me. They were letters to Mike Pence or McConnell, you know. They went to -- you know, I never -- the Arizona legislature never personally sent me a letter, so I didn't do anything with it.

Q Fair enough. But like this letter that we are looking at right here was sent by Senator Mastriano to Katherine Friess, Rudy Giuliani, you, and Jenna Ellis, so was he --

A -- know that it happened, but it's not addressed to us. It's addressed to McConnell and McCarthy.

Q I guess that's my question. Do you know whether they were asking you to pass these along, or was this just like a courtesy copy, if you know?

A I would imagine it's a courtesy copy. I don't know.

Q But you are not aware of anybody doing -- excuse me, any -- you are not aware of anybody doing anything with these letters addressed to members of Congress or Vice President Pence from the legal team's perspective?

A Yeah. I mean, they are not addressed to us. Yeah. We didn't do anything with them.

Q If we could go to Exhibit Number 40. This is a document that you provided, an email from Katherine Friess to Mr. Giuliani, Ms. Rion, Mr. Kerik, Stephen Bannon and you. Subject is Chairman Graham dead votes memo for your consideration. And then attaching a document or, excuse me, a couple documents, one Word document and one Excel document.

She says, Mayor, attached please find a memo to Senator Graham, along with a spreadsheet from the Kaufman-Geels team regarding dead voters in Georgia.

Q Do you remember Senator Graham reaching out to the legal team for information related to dead voters in Georgia?

A Yeah, I did.
Tell us about that. What do you remember?

That was -- I think that was the second time that -- I don't know if it was the first or second time that I was in Meadows' office, but Graham -- it may have been after the phone call. I don't know. It was probably after the phone call. Maybe Graham was there too. I don't know. But we were in Meadows' office, and Graham was like, oh, I'd love to support the cause. I think it would be great to, you know, really show all the fraud. Send me a memo and show me, you know, what information you have got. I'll champion it.

So she sent him a memo, and he did nothing with it.

Okay. That meeting that you had, I understand that there was a meeting around January the 2nd with Mr. Meadows, Senator Graham, Mr. Giuliani?

That's related. Yeah.

Okay. And that was the same day as -- at least I understand it, the Secretary Raffensperger call?

Okay. That makes sense. Yeah. That's probably right.

Was Senator Graham there for the call with Secretary Raffensperger or did that happen before or after?

He must have been there. I don't remember which came first and which came second, but he was in the room when we were talking about the election stuff. So that makes me think that Graham was also in the room during that call, but I don't specifically remember.

Do you remember anybody joining the meeting you had with Mr. Giuliani, Mr. Meadows and Senator Graham via phone?

On this particular -- particular topic, I don't remember. There may have been someone on the phone beforehand. And my recollection is that talking about
putting the memo together for Graham, there was nobody else on the phone or otherwise, but there could have been something -- there could have been something like before or after or something. I don't know. I don't remember.

Q Okay. Just walk us through that conversation as best you can between Senator Graham, Mr. Giuliani about the joint session on January 6th at all and evidence of fraud?

A I did. I mean, that was the extent of it. Senator Graham was saying get me your information. He goes, You don't even have -- he goes, Don't give me all of it. Don't tell me everything because it's too overwhelming. Just give me five dead voters; give me, you know, an example of illegals voting. Just give me a very small snapshot that I can take and champion.

And that -- I actually did one as well, I think. Maybe this is it. I don't know. But Katherine obviously sent it and he did nothing with it.

Q Okay. Do you remember in that meeting that you had at the White House with Mr. Meadows anything coming up about the joint session of Congress or the rally on the Ellipse that day?

A No, nothing.

Q Do you remember anything coming up about marching to the Capitol or protests where people would march to the Capitol during that meeting?

A I don't think we talked about it at all.

Q Do you remember ever being in Mr. Meadows' office where those topics came up?

A No. I don't ever remember having that discussion with anybody.

Q All right. So, in this memo, Ms. Friess says, This is significantly smaller in scope than we expected, and only includes Georgia due to the following issues:
Pennsylvania numbers not being able to be verified, Michigan numbers were from the CheckYourVote website, and since we couldn’t verify those, and given the problems -- or excuse me, the problems with PA, I don’t believe we should send those to Chairman Graham.

Nevada numbers only had date of birth and DOD, date of death, and did not include ballot or turn date, and thus do not believe we should provide those to him without that information. And then it goes on to say, the chairman very specifically said that he only wanted verified numbers.

Okay.

And then it says, in the last paragraph, one last item, many of the dead voters on the Georgia list sent their vote in before they passed. I don’t think this makes a particularly strong case. And I think it is possible that Chairman Graham will push back on that.

Almost all of them died in October of 2020, a few in November of 2020, and a few in September of 2020. I think this makes the case for unfortunate timing. Many sent their ballots before they passed, rather than nefarious activity. Am raising this just so everyone is aware of what the data actually says.

Do you remember getting this email in January, around January 4?

No. I got this email? I’m on it?

This is something you produced to us, Ms. Bobb.

Oh, okay. No. I don’t remember getting it, but I remember having this discussion with her. So, I mean --

Tell us about that. It seems like there’s some questions about the data.

Go ahead. I’m sorry.

This is it. I mean, she -- she and I had this conversation, and she just put it
in writing in the email. I didn't remember reading it, but I remember her saying this.

Q And do you remember whether these conclusions that Ms. Friess made about dead people voting or the inability to verify dead people voting in Georgia affected at all the messaging that a legal team or anybody else was putting out about purported fraud in the election?

A No. They are talking about that specific website. Like if you scroll up, she's talking about -- well, I can't see it. She's talking about the website from CheckYourVote.Org. That was a website that had dead voters on it. She's saying we can't verify the information on that website.

Q I think she's saying that they don't include Michigan numbers from that website because of the problems with that website. But this is all about Georgia information separate from that. Do you have a different understanding?

A I don't -- I mean, I don't know. This is -- this is her thing. You would have to ask her, but I know that as she lays out here, we tried to be very specific and very accurate with the information we were finding.

Q And did you do any work related to dead voters in any states?

A Yeah. I looked into it and, I mean, I looked into all of the different kinds of problems in the states. And I came to a similar conclusion that she did, where I -- there certainly were dead people that voted in certain states, but I don't think the dead voters alone were the substantial problem.

I mean, I think there were many other problems. I think voter overload and other issues were a much bigger problem than dead voters but, yeah, there were a handful of ballots that were cast. Were they cast before the person died? Were they cast nefariously by a loved one after that person died? Was their name used, you know, surreptitiously by someone who had access to the voter role, like, I don't know. How do
you verify. I don’t know. So the dead voters are a hard one to verify.

Q Do you know who Brian Geels is? G-E-E-L-S?
A I do.

Q Did you work with him at all in the post-election period?
A Only to the extent that I used his affidavit. Like he put together a very thorough affidavit of his analysis. And I took information from his affidavit, but that was it.

Q I believe some of the information he put in his affidavit related to dead voters; is that fair?
A Probably. I mean, you would have to show me what his affidavit said but, yeah, probably.

Q Okay. And --
A Do you know -- analyze the voter role and, you know, looked at all of the questionable votes.

Q And given this difficulty in verifying potential dead voters, and Mr. Giuliani I believe said that there were something like 10,315 dead voters in Georgia; do you know if Ms. Friess or anybody else ever said that it may not be that number, that that may be an inflated number based on some of the difficulties in verifying?
A No. I don’t know where that number came from, like where -- did that come from Brian Geels?

Q I know Mr. Giuliani said that, and I believe that it may have been informed by Mr. Geels.
A Oh, I don’t know. I mean, I don’t have the numbers memorized, but I don’t remember specifically how many or what --

Q Go ahead. I’m sorry.
A I do think Brian Geels did good work. I don't think his work has been too substantially challenged but, I mean, I don't have it memorized. I don't know what it said.

Q Okay. And along those lines, I do think Mr. Geels talked about dead voters, particularly those in Georgia, because he was involved in litigation --

A Yeah.

Q -- in Georgia. Do you remember Ms. Friess or anybody else pushing back on Mr. Geels' information or the opinions that he explained in his affidavit based on findings like the one she laid out here in Exhibit Number 40?

A No. I don't think she's pushing back on Geels' information here. I don't know. You would have to ask her.

Did anyone ever push back on the public statements that Mr. Giuliani was making about the number of dead voters?

Ms. Bobb. I don't know.

BY

Q Did you?

A No. I don't think so. I'm not aware of statement -- like lots happens, you know. I don't control everything. But I'm not aware of a statement that Rudy made that I identified as inaccurate. There may have been one. I don't know. I am not like -- I don't know. I -- when you ask me if I've ever corrected a statement, no, because I'm not aware of any statement that he may made that I would say is inaccurate, but I don't know.

Q Do you know where Ms. Friess lives these days?

A No idea.

Q You haven't been in contact with her since January 2021?
A: Nope.

Q: All right. I understand that on January the 4th, yeah, on January 4th, I understand there’s a meeting with Cleta Mitchell and staff members working for Senators Holly, McConnell and Cruz about evidence of election fraud in Georgia.

Do you know anything about that meeting?

A: Nope.

Can I ask a question really quickly. On the email that we just discussed from Ms. Friess transmitting the draft memos for Senator Graham, it looks like she sent it to Mr. Bannon as well. Do you know why he would have been copied on that?

Ms. Bobb: No idea.

Q: Okay. We can go to Exhibit Number 44. For that page 2, this is an email, you did not provide this Ms. Bobb, but this is an email from Boris Epshteyn. It says, Per Mayor Giuliani, attached please find following info: The first is the bullet point overview numbers of interest; the second is a substantive analysis; the third is Peter Navarro's first report. Thank you, Boris.

And that was sent to Jason Miller, Ali Pardo, and Tim Murtaugh. And then Mr. Miller sends it to Marc Short who is the chief of staff for Vice President Pence at the time.

Are you familiar with any effort to develop like briefing materials or information for members of Congress ahead of the January 6 joint session?

A: No. But that -- I don’t know. I have no background. I had nothing to do with this, but reading this email I don’t think it's a briefing memo. I think it's going to the Coms team. Jason Miller and Tim Murtaugh are coms. I think Boris is sending it to
them as talking points.

Q Not an unfair assessment. The only reason I'm asking is because the subject line is briefing materials for house members and senators, and I should have mentioned that.

A No. I don't know.

Q Okay.

A Who did?

Q Did you have any role in putting together information to give to members of the House or Senate in advance of January 6?

A No.

Q Do you know if anybody did?

A No, not to my knowledge. I mean, somebody might have tried, but I'm not aware of anybody who did.

Q It's been reported that on the evening of January 5, Mr. Epshteyn, Mr. Giuliani and Mr. Bannon were reaching out to members of Congress to encourage them to reject Biden electors during the joint session.

Do you know anything about that outreach to members of Congress?

A Nope.

Q Did you reach out to any members of Congress to encourage them to object or not adopt certain electors in the joint session?

A No.

Do you have any question?

Yeah. Earlier you mentioned being in Mr. Meadows' office with Mr. Giuliani on the day of the call with Georgia Secretary of State Fred Raffensperger, which would have been January 2nd.
Were you with Mr. Giuliani during the entire time that he was visiting the White House that day?

Ms. Bobb. No. Well, no. I mean, that meeting with Meadows, the phone call and then that -- I assume the aftermath of the discussion with Senator Graham was I thought the only meeting he had that day because I think I did go with him, but I don’t know if he was there at any other time that day.

Did you remember leaving with him?

Ms. Bobb. I think so. I think we came and went together.

Okay. So you don’t remember any other meetings that Mr. Giuliani had other than the things that you have already described to us on that day?

Ms. Bobb. I think, unless -- if he had meetings before that, he would have gone there and back without me.

Understood.

Ms. Bobb. Yeah.

Q And where were you going there and back from? I understand that Mr. Giuliani was set up an operation, essentially an office in the Willard Hotel?

A Everybody -- like it sounds -- like it was his hotel room. It was just his hotel room, but yeah, that’s -- I met him at the Willard. We went together and went back. I live very close. I live on [redacted] and I can walk to the Willard, I can walk home. So I just walked to his hotel, got in the car, came back, walked home.

Q Will you pull up Exhibit Number 45? I do want to talk to you about the Willard. I understand that that’s where he set up his office, but tell us about some of the activities, the meetings that were going on there.

A Well, I mean, that’s -- that would be attorney-client privilege to the extent
that you want to know what happened in the legal office of Rudy Giuliani. You can call it a legal office. It was his hotel room. I mean, to the extent that we did legal work there, I can't discuss that, but -- you know.

Q Okay. Let's pull up Exhibit Number 45, page 2 specifically. Okay. So this photograph, I assume this was taken in the Willard while you were there; is that right?

A Yup.

Q Is that you in the middle where it says Bobb?

A Yup.

Q All right. Mr. Giuliani where it says Mr. Giuliani. And do you remember Mr. Eastman being there?

A Yeah. I remember Eastman. I have no idea who that little -- who is that?

Q Okay. So you don't know who that is?

A No idea. Who is he?

Q I'll represent to you he's been described as someone associated with the 1st Amendment Praetorian, a business development person. I'm not familiar with him being a lawyer.

A He was not on the legal team. That's for sure.

Q Okay. If we go to page 3. I understand Mr. Hyde, do you know who that is?

A No. I interacted with him that day. He was really weird and asked to leave, escorted out. And I'm not surprised that he took a bunch of pictures and posted it but, no, I don't know him personally. I met him that day and have never talked to him since.

Q And you say that day. Do you remember when these photographs were taken or what day it was when you were there?
A Well, I'm assuming that that's January 6 because that's what it says all over the internet. I don't actually remember but, I mean, if you know, please tell me, but I -- I believe that's January 6 just because that's what's been reported on line.

Q Do you remember if this was before the rally, after the rally, the evening?

A What time of day do you remember being there?

Q Do you remember approximately what time you got to the Willard after reporting at the Capitol?

A I left kind of early, somewhere between 11:00 a.m. and 1:00 p.m. probably.

Q And so this was after, these photographs were after the violence at the Capitol started, people got into the Capitol?

A Right. This was -- that guy, whoever Hyde is, I remember him coming at night because -- I don't know who he is, but it's like -- I think he had gone out -- he was there. He was in the room in the evening, and so I remember that night, but at least when this picture was taken, but I don't -- that's all I remember.

Q There's a person there in orange, Mr. Oltmann. Do you know who that is?

A Is that Joel Oltmann or Joel Oltmann?

Q Do you remember from being there? I believe he's a podcaster?

A Yeah. I think that's him. It's hard to tell from the picture, but if that's who it is then, yes, I met him. I don't -- I don't remember -- I mean, obviously I'm in the picture with him. I don't specifically remember meeting him in Rudy's room but, yeah, I remember meeting him at the Willard.
Q: Do you remember what he was doing there?
A: No.

Q: And what was happening at that time? This was after the attack on the Capitol had started. What was going on inside the room?
A: Nothing. Everybody was just watching the news and eating and trying to, like, some rando talked his way in for a few minutes and security escorted him out. There's nothing happening.

Q: Were people making calls to members of Congress in that period from the --
A: No. No. By 1:00 or 2:00, by the time I got there everything was like, I mean, everything that happened at the Capitol was a huge disappointment and everybody was upset about it. So, no, nobody was doing anything. Everyone was just kind of sad.

Q: Huge disappointment in what sense?
A: It was a huge disappointment in the sense that, I mean, in every sense of the word: One, the fact that there was violence at the Capitol; Two, the fact that to some extent there -- I believe they were framing Trump supporters.

I was there. I was at the Capitol on January 6. I reported from Cannon. I was standing in the grass and I watched what happened. The -- the level of violence or activity was small, very small in comparison to the number of law enforcement that were there. You know, military -- I was a judge advocate in the United States Marine Corps. I'm very versed in the use of force and the escalation of force, and I know what law enforcement -- not only do I know what law enforcement can and can't do, but my job when I was deployed to Afghanistan was partially was to train our military on how to use the escalation of force in urban settings. And they should have been very, very easy to quelch the uprising or whatever it was that we saw.
And the vast majority of people that I saw there, the Trump supporters that I saw there were trying to make it stop. I personally do not believe the Trump supporters instigated January 6. And, I mean, it was just really disappointing that it looked like President Trump supporters were getting framed.

I do believe they are being held as political prisoners. I think it's a shame and an embarrassment to this nation what's happening to them. And especially considering months before in -- I think it was May 2020, Black Lives Matter and Antifa assaulted the White House. President Trump had to go to the bunker because they were breaching enough to cause very serious security concerns. You have got Kamala Harris and a lot of the liberal politicians saying, oh, get them out on bail. Get them out on bail.

They just attacked the White House. Then you have someone take a selfie in the Capitol and they are incarcerated for over a year. I think it's disgusting, quite honestly. So I think the way everything that happened and went down, it was a very sad day for different reasons than the liberal narrative that we pushed, we were all saddened.

Q Understood. And I'm not here to challenge you on your beliefs, Ms. Bobb, but have you seen the court documents for some of these cases of people who say that they did this. They broke into the Capitol because they believed that Mr. Trump was asking them to. Have you seen those documents?

A I've seen documents. I've also been a criminal -- I was a criminal defense attorney in the Marine Corps. I'm very well aware of how those documents get created. And I'm not -- don't get me wrong, I'm not in any way trying to absolve everyone of responsibility. Certainly anybody who breaks the law should be held accountable. I don't think solitary confinement for ten and a half months is a solution, but yet it's happening. And I don't think starving people because they have dietary restrictions and they have to be incarcerated in federal prison, I don't think that's appropriate. I
believe that’s cruel and unusual punishment.

So, yeah, should people be punished, probably? I don’t know. Do I think they were set up? Do I think it’s a political ploy? Do I think that the standard for conservative protesters verse the violence that we saw, all of 2020 where people were rioting, looting. People were murdered and killed, and people were dying because of the destruction. People lost their homes and businesses. And someone goes and takes a selfie in the Capitol, I don’t buy it. I don’t buy it.

I think the whole thing is fake. I think it’s a political ploy, and it really angers me.

Q And I’m not here to move you off your views, Ms. Bobb, just ask questions related to the day and what you saw and know. You mentioned that it was people --

A You asked me why we were disappointed. That’s why we are disappointed.

Q Yeah. And so my follow-up question that I asked, was any part of the disappointment related to Vice President Pence and what he did or did not do on that day?

A Yeah. Pence was a huge disappointment across the board. I mean, he’s a disappointment as a conservative but, I mean, that -- yes, that is part of the disappointment, but I think the whole thing is really tragic.

Q So we know that Mr. -- and this has been publicly reported that Mr. Eastman, Dr. Eastman was exchanging emails throughout the day and that afternoon and into the evening with Greg Jacob, the attorney for Vice President Pence. It looks like he was in the picture in the war room.

Were there any discussions about that, about contacting staff for the Vice President about his role in the joint session while you were there that day?

A Not at that point. No. I mean once -- not by January 6th, probably maybe -- maybe on the fourth or fifth, like leading up to it to try to explain to him like you
actually have the authority to do this, but by the sixth rolled around, what are you going
to do, there's...

Q We do know that Mr. Giuliani left a message I think for -- intended for
Senator Tuberville, and he did so in the evening. Do you remember him doing that from
the room?
A I sure do.

Q All right. Tell me about that.
A I mean, I just remember it. He left a -- I don't remember what he said or
what he did, but he left a detailed message and it was for the wrong senator.

Q Part of the message, and I believe we have it as an exhibit, we can show it to
you, but my understanding and my summary of it is that he's asking Senator Tuberville to
do something still, to seek more time for some --
A Oh, yeah, I think he was. He was, yeah, give them more time or send it
back, something like -- I think that's fine. Yeah. That's what it was.

Q Do you know if Mr. Giuliani or others were making similar calls to other
senators or House members?
A I don't specifically remember who or what, but probably. I mean, he, yeah,
you know, objecting to electors is something that's done I think in every single
presidential election. So I don't think -- and this one was particularly objectionable, so
probably. Like I said, I don't remember specific people but, yeah, that was probably
happening.

Q And the time period specifically was the afternoon or evening of January 6th.
Do you remember that happening with Mr. Giuliani, like when he left the message for
Senator Tuberville?
A I don't remember specific days or anything like that. I think the sentiment
by the evening of January 6 was like, you know, it's over and stuff, so...

I mean, to be clear, Mr. Giuliani's voice mail message to Senator Tuberville was at like 7:00 p.m. on the day of the sixth. Was there a sense on that day, like that evening, that there was still a chance to encourage members of Congress to delay or to object to elector certification?

Ms. Bobb. I mean, I don't -- I don't remember when it like fizzled out like by the day, the hour. Like now we are talking about a difference of 12 hours, whether it was the 6th or the 7th, you know, I don't know. But generally after the events of January 6, the effort was largely over.

Q Do you remember General Flynn being at the Willard at any point when you were there?
A I don't think he was there while I was there. I mean, he may have been there, but I don't remember seeing him there.

Q And what was his role, if any, with respect to legal challenges, the legal team in that period just before the sixth?
A I don't know. I mean, I think he was working primarily with Sidney, so I don't know what she was doing with him, but...

Q Do you remember Roger Stone being at the Willard?
A I do not.

Q Did you ever talk to Roger Stone in the period after the election up to January 6?
A I don't think I've ever talked to Roger Stone.

Q How about Alex Jones, did you ever talk to him in that period between November and January?
A: I don't think so. No.

Q: Now, the Oltmann, the person we just looked at, I believe the podcaster, what was his role, if any? What was he doing in the Willard?

A: I think he was there separately. I think he was there with his buddies or whatever and -- I don't know. I don't know what they were doing or what they were up to. I did -- I met him and they were up -- I think they were up a floor or two. I said hello, introduced myself. I think they were working on some stuff similar to what, you know, we were -- they were just investigating, trying to find stuff, but we weren't like formally linked or anything.

Q: At that point after the attack had started on the Capitol, were there any discussions about investigating the attack itself, about looking at who was causing it, who was doing it, and did you take steps in the Willard to actually do that?

A: Well, at that point we were -- there was a lot happening at that point. There was debate about who had started the attack. Like some people were going, oh, this makes Trump supporters look really bad. And some people were going -- I took the position of those aren't Trump supporters. I was standing out there, and the Trump supporters were trying to stop it.

It was very confusing having stood on the Capitol to see that the ruckus was actually quite small. And I was there before the doors were open. So when I was out there, nobody had actually gone in. And it was very confusing because the -- it's cliche to say this because it was so abused in the summer of 2020, but it was overwhelmingly peaceful. And there were a few, you know, pockets of people, but most of them, Trump supporters were trying to get the bad actors, so to speak; they were trying to get them to stop.

And the police officers weren't stepping in. They weren't using escalation of
force standard operating procedures as I'm used to seeing. And so it was confusing. And in the 15 minutes that it takes to walk from the Capitol to the Willard, and then, you know, I walk in the Willard and you see it on TV, and it makes it look like there's a fricking war zone going on. I mean, it was -- it was really confusing. And so there was a debate about who was actually, like who was doing it. There was some discussion about that, but --

Q: Just from a timing perspective, you said you left the Capitol before people made it into the doors and into the windows?

A: Yeah.

Q: Okay. And you mentioned Mr. Oltmann and his friends. What were they working on?

A: I don't know. I mean it was similar, I think, to the stuff we were working on, like trying to figure out like data set. I think they were looking more at data or machine information. I don't know exactly what they were looking at.

Oh, yeah, yeah. No. This was Oltmann. He was like the Dominion guy, right, so, yeah, I think he was looking at the machine stuff, but I don't know. It was similar, but I don't specifically remember what it was.

Q: In these photos we looked at, there's this Luelsdorff person, Oltmann, Mr. Hyde, a lot of people not associated with the legal team. So can you just describe that afternoon, you know, what was John Eastman saying in the afternoon at the Willard about what was happening at the Capitol or during the joint session?

A: Well, I mean, so at what point -- this period of time that those pictures are a snapshot in time, there was a group of people who had like made their way into Rudy's room. And they were -- security was called and they were escorted out. So the unwanted visitors were not there very long.
To the extent that there was any like legal discussion, I mean, that's privileged
discussion among the legal team.

Q. And I'm just asking in the period where, like Mr. Oltmann and his friends
who were there investigating stuff or looking into things who were not part of the legal
team, or Mr. Hyde was there, Mr. Luelsdorff was there, what those discussions were?

A. I do not -- I don't ever remember Eastman saying anything while those folks
were in the room. The only thing I remember about Hyde being there lasted maybe,
maybe five minutes. I'm probably being generous. And everybody was uncomfortable
and was like who is this guy, how did he get in the room. And they were escorted out.

Okay. Why don't we do this, and I think now would be a good
time for a quick break and then we can assess where we are, come back and hopefully
wrap up relatively soon.

Does that work for you, Ms. Bobb?

Ms. Bobb. I would like to wrap up relatively soon. So, yes, like how much time
do you need?

Five minutes at the most, just a quick comfort break for everyone.


All right. Let's do that. Let's go off the record. Thank you.

[Recessed at 4:20 p.m.]

Let's go back on the record. It's 4:26 and we are resuming the
transcript interview of Ms. Christina Bobb.

Q. All right. I want to talk to you about the Vice President and his role in the
joint session.

When was the first time you became aware of discussions about the role of the
Vice President as president of the Senate during the January 6 joint session of Congress?

A I mean, I can't say, but I would think that would be attorney work product.

Q Just as far as when. Not asking for the content of any communications or any thoughts or impressions.

A I mean, one, I don't remember specifically, but I would think -- I don't remember.

Mr. Sibley, I see you came off mute. Did you want to say something?

Mr. Sibley. I just wanted to say, I mean, she can state when she first became aware of the issue but, yeah, as to the substance of any communication that made her aware obviously might be privileged.

Ms. Bobb. I was thinking of the timing of it to the extent that it would potentially show, you know, conclusions or something. I guess the objection is a bit irrelevant because I honestly don't remember.

Q BY

Q Okay. So it's been reported shortly after Thanksgiving weekend, Boris Epshteyn relayed to people in the White House an idea from Giuliani's team that the Vice President could reject electors, or I guess potentially take some other action related to the joint session.

Are you aware of Mr. Epshteyn relaying to people in the White House that idea?

A I mean, I wasn't part of it whenever he did it, but if you are saying it happened, I'm sure it did. He was --

Q Do you --

A -- the White House, I was not, so...

Q Do you remember talking with anybody who worked in the White House
about this idea about the Vice President's role in the joint session?

A No. I didn't.

Q Do you remember hearing that Vice President -- or, excuse me, that President Trump wanted Vice President Pence to meet or speak with John Eastman December of 2020 about his role in the Electoral College -- or, excuse me, the joint session?

A I remember hearing about that but I -- like through open sources. I mean, I wasn't privy to President Trump's conversations, planning or conversations.

Q Do you remember anybody reaching out to John Eastman to have him draft memos related to the joint session and the Vice President?

A Somebody may have or did, but it wasn't me.

Q Okay. And you don't know who it was?

A No.

Q Have you ever seen Mr. Eastman's memos? There's two of them. There's a shorter one and a longer one. And I can pull them up for you here if you'd like.

A I mean, the ones that you showed me, but they were not sent to me. I don't remember them being sent to me. If they were sent to me, I didn't, you know, look at them or read them.

Q Bear with me just a moment. All right. If we could pull up Exhibit 46.

So this is one of Mr. Eastman's memo, talks about a January 6 scenario that seven states have transmitted dual slates of electors to the President. And it talks about ultimately on page 2 a proposal where the Vice President takes some action or a combination of actions in his role as President of the Senate.

Looking at this now, do you recognize this document?

A No. Did I give it to you?
Q: You did not provide this to us. No.

A: I don’t recognize this.

Q: Without getting into the substance of the conversation, do you remember talking to Mr. Eastman about his memos that are now publicly reported?

A: I don’t think I’ve ever talked to him about his memos.

Q: What about his theories about the Vice President, without getting into the substance of them?

A: Without getting into -- so what’s the question?

Q: Did you -- do you remember ever talking to Professor Eastman about his theories related to the joint session and the Vice President’s authority?

A: I mean, I think that would be privileged attorney work product if I had conversations with him about it.

Q: Okay. Well, I’ll put it like this, and just to make the record, I mean, the fact that he has had conversations and written these memos is very public, including what he says was I believe a waiver by the President for him to talk about certain issues related to this.

So just the mere fact, all I’m asking is whether you ever talked to him about issues that are already made public, not the substance of what you got into?

A: Whether I talked to him about those issues is not public. So my role in it is not public. So, I mean, I don’t think I can talk about it.

Q: Okay. All right. So you think that would be privileged if you did or did not talk to Mr. Eastman about his views of the Vice President and the joint sessions, without getting into the substance of your conversation?

A: I think so. I mean, Joel, feel free to chime in, in but --

Mr. Sibley. I think as long as there’s not -- as long as we have a stipulation that it
won't result in some kind of subject matter waiver entirely for her to answer the question of whether or not she had a conversation on the general topic of Professor Eastman's theories regarding the Vice President's ability to send the election back to the states, whatever the general gist of those memos are, I think that's okay.

Yeah. And I will stop there. I'll represent to you that I'm not going to ask further if you did have such conversations, what those conversations were. So I will stop there.

Ms. Bobb. What's the relevance of the question then? Why does it matter if I talked to him.

BY [REDACTED]

Q Well, respectfully, Ms. Bobb, the relevance is for us to determine, not you as the witness. So I'm just trying to ask a question while respecting the contours of information that's not public or any privileged conversation you may have had.

A I had privileged conversations with John Eastman. Yes.

Q Okay. And those conversations that I'm focused on before January 6. I'm not interested in anything after January 6.

A Right.

Q So it was conversations that you just mentioned would have happened before January 6?

A I've had both. I've had -- well, yeah, I've had both.

Q Okay. Please show Exhibit Number 48, please.

This is an email. You did not provide this to us. It's from somebody named Ivan Raiklin to a number of White House recipients with a memo that he titled, or apparently titled Operation Pence Card, around December 22 or December 23.

Do you know who Ivan Raiklin is?
Did you have any interactions or communications with him after the election and up through January 20, 2021?

A No. I had no idea what he was even involved in this, so -- okay.

Q You know Ivan Raiklin. Who do you know him to be?

A I don't know how I would describe him. He's -- he like travels in conservative circles and like pushes the conservative agenda. Like I don't really know what his role or is or what he does. He's kind of like a -- like he goes to everything, you know, but I don't -- I don't know who he works for or what he does. Maybe he's a consultant or something.

Q Not aware of his efforts related to the joint session of the Vice President before January 6?

A Correct. This is the first I'm seeing of it. I didn't know about this.

Q And haven't otherwise heard about what he was doing with respect to the joint session before?

A Correct.

Q All right. If we can pull up Exhibit Number 50. This is a bullet point list, understanding it was created by John McEntee related to the Vice President and his authority at the joint session.

Are you aware of anything John McEntee did with respect to the joint session?

A No.

Q Have you ever seen this bullet-pointed memo before?

A No.

Q If we could pull up -- before we get there, there's a lawsuit filed called Gohmert versus Pence. Louis Gohmert filed it with a number of other people versus
Vice President Pence.

What, if any, was the Rudy's team, the legal team's role in the lawsuit that Mr. Gohmert filed?

A I don't know anything about it.

Q And what about Texas versus Pennsylvania? That was a lawsuit filed by the attorney general of Texas, Ken Paxton, against Pennsylvania and other state. Are you aware of that lawsuit?

A -- aware of that lawsuit, but obviously we didn't have a role in it, at least not to my knowledge. If Rudy talked to General Paxton maybe, but I'm not aware of that.

Q But you had no role in helping drafting any complaints or any other pleadings?

A No.

Q Pull up Exhibit 55, please. This is a document you provided to us. If you go to the bottom of page 1, it's from you to somebody named Kevin Daniel Bishop as well as Richard Perry, and the subject is voting irregularities.

You say, Good afternoon, gentlemen. Per Senator Graham's request, I've attached a memo with a sample of traditional voter fraud. Please let me know if you have any questions.

And then you send it roughly a half an hour later to Ms. Michael, saying that Chief of Staff Meadows requested a copy of the memo that we sent to Senator Graham. It's attached here. Can you please print it for Mr. Meadows. And Professor Eastman is on his way.

Do you remember this email?

A Vaguely. This is what I was saying when you were talking about Katherine's email, I was like, oh, I had sent a memo as well. I guess we just duplicated work and
didn't know it.

Q This says Chief of Staff Meadows requested a copy of the memo. When
and how did he request that?

A I don't remember when and how he requested it. Senator Graham -- it was
in Meadows' office that Senator Graham requested the memo. So this is probably the
courtesy copy to Meadows to let him know like, hey, per that conversation that we had in
your office; this is what we sent to him.

Q This also says, you say, Professor Eastman is on his way.

A Yeah. We had a meeting with -- I think it was with Pence on the fourth,
didn't he.

Q You tell me. Is that what you recall that Professor Eastman was meeting
with Pence?

A I think. I thought he had one. He met with him at some point. I thought
it was like the fourth or fifth, but if I said that Professor Eastman is on his way,
that's -- that's what I take -- I don't remember what I meant at the time, but reading it
sitting here makes me think he was on his way to the White House.

Q Did you ever learn about what happened in that meeting between Professor
Eastman and Vice President Pence on the fourth?

A Yeah. I mean, Eastman put it on his website, so it's public.

Q All right. So tell me about it. What did you hear about it?

A Well, I mean, I -- sorry. There's a fly on my end.

Been a while since I read what he posted, but the best of my recollection was that
he was explaining to Eastman -- or, I'm sorry, Eastman was explaining to Pence that he
had the constitutional authority to allow the state legislatures more time to ensure that,
you know, they certified the right electors or whatever, and all he has to do is send it back
And Pence didn't want to. Something like that.

And did you hear about that conversation from Mr. Eastman as well?

I don't think so. I don't know. I didn't work -- like Eastman and I know each other, and we would say we worked together on Rudy's team efforts, but we weren't like we didn't do a lot together.

Kevin Daniel Bishop, is that somebody who you know to work for Senator Graham?

Probably. That's probably who they told me to send the memo to.

Did you recall any follow-up that you got from Senator Graham or his office regarding what you --

No.

-- sent over?

I don't think they even acknowledged receipt.

We go to page 3 of this exhibit, this is an attachment to this email that you sent to Senator Graham and then along to Ms. Michael.

Do you recognize what this is?

That looks like -- is that from Arizona? I don't --

I believe it is.

Yeah. That looks like the number of over votes for precinct, but those don't look like precincts. I don't remember exactly what that is.

Do you remember where you got this information from, this over-vote data?

Arizona GOP.

Did you say Arizona GOP?

Yeah.

Did you do anything to look into this information that Arizona GOP gave
you?

A I don’t think so. I think Arizona GOP got it from the counties. Like I think that this was like the official county -- I don’t remember. I mean, I don’t remember, but I don’t think this was -- this -- I do not believe -- and I did not believe at the time that it was something that the Arizona GOP created. I think they had the information.

Q And if you go to page 38, same Exhibit 55, this is another attachment to the email that you sent to Senator Graham and then on to Mr. Meadows. This is a expert witness designation followed by a report by Jesse Kamzol.

Do you recognize this?

A Yeah. I mean, I remember this. I don’t remember the exact document, but yes.

Q And do you remember why you sent it to Senator Graham and Mr. Meadows?

A They wanted information on where -- well, I would have sent it to Meadows because I was cc’ing, letting him know what we sent to Graham, but Graham had asked for information on the evidence that we were finding.

I’m sorry. The document is behind the picture, so I can’t see the caption.

Yes, of course. If you zoom out a little bit that might help.

Ms. Bobb. So, so was that his affidavit? Because I remember there was an affidavit in Nevada that had a lot of really good information in it. I thought that was it but the caption doesn’t look like an affidavit.

Q Yeah. So this is a designation of expert witness, Jesse Kamzol. And then if you go to page 41, there’s a report.

A Yeah.
Q Of Kamzol.

A Okay. I don’t remember that part of it. Maybe this was the precursor to his affidavit, but he has an affidavit where he like explains everything that he analyzes, so this must have been a precursor to it.

Q Okay. So in this case, I’m just asking if you are aware, in this case of Law versus Whitmer, the court considered Mr. Kamzol’s information in his affidavit and found that his expert report was unreliable because it had little to no information about or supervision over the origins of his data, the manner in which it had been matched, and what the rates of false positive would be, and that there was little or no verification of his numbers. That from the court came out in December of 2020. Did that affect at all from your consideration or the legal team’s consideration of Mr. Kamzol’s affidavit or report about this information?

A No, I’m not -- I don’t have a specific recollection about that. I can’t say. I don’t know. It -- as I sit here, I don’t remember being affected by that.

Q Were you aware that the court did find that his affidavit was unreliable?

A I don’t specifically remember that, but I knew that there were a lot of -- I knew that we were struggling to get our evidence admitted. So, I don’t specifically remember his but, you know, I was probably aware of it. Doesn’t surprise me.

Q If we go to Exhibit 56, this is an email chain first from Jason Miller at the bottom, if you scroll down a bit. Its subject line is Tweets. Jason Miller is asking you, it looks like, for a series of tweets about various states on January 6 in the morning. Do you remember that?

A Vaguely. I mean, I’m looking at it, so yes, but I probably wouldn’t have recalled it without the email.

Q Why were you asked to draft tweets about Wisconsin, Arizona, Georgia,
Pennsylvania and Michigan on January 6?

A  I mean, I don't know. You would have to ask Jason. But I had information about it, so it's probably why they asked that. I don't know.

Q  Okay. And if you look at the top one in response to his request for Michigan, you talk about precincts out of balance. A forensic exam showed a 68 percent error rate. And then you say hashtag 10 more days, which also appears on some of the others.

Is that hashtag 10 more days, what's that?

A  In reference to the request from the states to have 10 more days to reconsider their electors.

Q  And do you remember other than yourself -- well, including yourself, but I think we already talked about it, anybody on the legal team encouraging states to ask for 10 more days as opposed to just being the recipient of a request like that?

A  We did already discuss this, and no. I don't know. I don't know. It wouldn't have been out of the question. It would have been a long narrative that we were doing, but I don't remember a specific effort to do that.

Okay. I'll pause there briefly. Do you have any follow-up on that?

Not right now.

BY

Q  Okay. As far as the events of January 6, did you have any role in planning or preparing for any rallies on January 6 in Washington?

A  No.

Q  Mr. Giuliani gave a speech, as did Mr. Eastman. Did you have any role in preparing their remarks?
A No.

Q Were you ever aware in that period after the election and up through January 6 of any discussions about encouraging people to go to the Capitol on January 6 to protest or otherwise?

A No.

Q Were you ever aware of any desire, intention, plan to hold an event at the Capitol on January 6, whether it was the President himself or anybody else?

A I remember talks about it like from the media. I remember something about like I knew the people were coming to DC, but I don't remember much more than that. And whatever I knew would have been from open source.

Q Did you ever hear anything about the potential for violence on January 6?

A No.

Q Did you ever hear anything about the potential that people would try to storm the Capitol or get inside the Capitol on January 6?

A No.

Q On January 6, or by January 6, I should say, what was your expectation as to the likelihood of success -- of now President Biden not being certified the winner?

A I wasn't looking at it like that. I was looking at it like what was Pence going to do and was -- the question in my mind was does Pence have the backbone to give the states more time. I wasn't looking at it as who's going to be the next President. I wanted to know if there was a Republican leader who didn't kowtow to the swamp.

And the answer was no. Mike Pence was a coward.

I think he should have sent the -- so that was the question in my mind is does Pence have what it takes to actually do -- like stand up to the woke mob? Nope. He sure doesn't. So that was the issue for me.
Q Of course that's never been done in history before, right? What Mike Pence was being asked to do that day has never been done before, correct?

A Correct.

Q Okay. And what about --

A Correct, well -- sorry. Go ahead.

Q What about the members? I mean, there are Republican members of Congress as well who could object and gather. Did you expect that their objections would have any effect in the joint session that day?

A I didn't think the objections would have. If Pence -- my whole expectation was this. If Pence sent the vote back, what the states would do. I thought that the legislative members of Congress should object, and many of them did. Pennsylvania had a record number of objections. So, yeah, I thought they should have objected, but I didn't actually expect their objections to do anything.

I mean, you know, that happens every election. Democrats object every time. There's a Democrat that objects every time a Republican wins and vice versa. That's just part of the process.

Q Do you know who Eric Herschmann is?

A I don't know. Kind of sounds familiar, but I can't place him.

Q White House employee, he's also a lawyer. He's a New Yorker.

A I don't know him.

Q Okay. The reason I was going to ask is Mr. Giuliani had a call with him that morning, and I was wondering if you were aware of that?

A Not particularly.

Q Okay. And without getting into the substance, are you aware of what Mr. Giuliani spoke with the President about that morning on January 6 before the rally?
A With the press?
Q The President.
A I have no idea.
Q Were you at the rally on the Ellipse when the president spoke?
A No. I was at the Capitol. I was reporting from Cannon.
Q What was happening in Cannon at that point, if anything?
A Absolutely nothing. It was completely dead. I had no idea what was going on because I was watching the speech on the iPhone or iPad or whatever. And as a reporter, you try to get members of Congress to give you a sound byte or something, and there weren't even any walking the halls.
I scheduled an interview with Mike Kelly, so I got that interview. And then it was dead and there was like 20 reporters with their crews standing around twiddling their thumbs. So I told my crew I'm going to step outside and see if there was anybody. And Trump was still speaking at this point. I was like I'm going to just step outside and see if there's anybody worth interviewing.
And when I stepped outside, there was a lot more people on the grass than in Cannon. There was nobody, you know. And so I called my crew and I was like, hey, why don't you guys come outside and we'll do like man-on-the-street interviews with people out front.
And in the 10 minutes that it took me to get from the Cannon rotunda to the grass, my crew was like, uh, they are locking the press in the basement in Cannon. So I didn't have a camera crew or anything, which is why I went to the Willard because I couldn't -- I did a few things on social media, but I lost my crew. So I just went to the Willard.
Q Okay. If we could go to 57, and start on page 3 of Exhibit 57, I think this is
going to be exactly what you just talked about, Ms. Bobb.

A Okay.

Q This looks like a tweet that you sent out from the Cannon rotunda. So this is before the attack on the Capital started, right? You are in the Cannon rotunda.

A Um-hmm.

Q Do you remember sending this out?

A I mean, yeah, vaguely. I remember I was tweeting from the rotunda. I don't remember what I said, but yes, I remember doing it.

Q Okay. And then if you go up, the next page, looks like you had a number of tweets that you responded to. And then you post something on January 6 that says, Happening now, storm clouds over the Capitol.

Is that footage or a photo that you took --

A Yeah.

Q Okay. And then it looks like if you go up, you say, Heading to the Capitol. I think this occurs later in time than the picture we just looked at. So are you at this point moving away from the Capitol and towards the Willard?

A Yeah. I was -- when I said heading to the Capitol, I was referring to the people that were going, because I started at Cannon so I was walking against the crowd.

Q I see. And then you say, Press at Cannon are being evacuated. I think you just mentioned that with respect to your camera crew, right? Okay.

A Yeah.

Q And then you say, Where's at Mike Pence. And the Tweet above that is At Mike Pence can solve this now by sending it back to the legislators.

What did you mean by those two tweets?

A Exactly what I said, and what I was saying to you. In my mind, the question
of the day was would Mike Pence send the elector -- slate of electors back to the states to ask for either clarification or reconsideration. That, I mean, that was the question of the day for me.

Q. And when you say, At Mike Pence can solve this now by sending it back to the legislature, what could he solve?

A. If he -- my thought process is if he sent it back to the legislators, forcing the legislators to either confirm their original vote or replay, whatever, it would just confirm what the states wanted. I think the question was -- the question in my mind at least was there was a lot of concern that election officials and potentially malicious actors in the states certified the wrong votes.

And so if you send it back to the states and force the states to take a look, and if they -- if they decided to keep their vote, okay, fine; but at least, you know, at least you forced the issue. Without doing that, I think a lot of people -- I think a lot of people feel that they were disenfranchised in the election.

Q. And when you say he can solve this now by sending it back, are you talking about the violence at the Capitol, like that would help quell the violence?

A. No. There was no -- I did not -- like I saw violence. Like I said, the doors hadn't been opened yet so there was no actual breach, but I didn't see violence at the Capitol when I was there. I saw like holes that I thought the police would be, you know, but I didn't -- I never thought -- like you can see I didn't even tweet out anything violent at the Capitol because I didn't think there was any violence at the Capitol. It was that small.

So, I mean --

Q. And we don't have the time stamps on here, so I'm just going to ask you, do you remember sending this tweet while you were walking back or once you had already
returned to the Willard?

A Oh, that's weird. Why aren't there time stamps? Do you know?

Q I don't know the answer to that, but do you remember whether you sent those, particularly those last two tweets we've been talking about, once you got back to the Willard?

A No. I think the ones -- I mean, I don't think I tweeted from the Willard. I think the ones would have been the ones at the rotunda. I don't remember specifically, but I don't think I tweeted at all from the Willard.

Q Okay. If we go to Exhibit 58. This is one of the tweets we looked at earlier that you sent out. And it looks like it's a retweet of somebody else.

A Okay.

Q And I believe that's an image from the movie The Patriot, with respect to the Revolution?

A Did I retweet that? I didn't retweet that. Somebody else, whoever, that looks like a Cyrillic something tweeted. I didn't tweet that out.

Q Okay. So you don't remember -- it's unclear to me, because it says Christina Bobb retweet, but that's why I'm asking the question.

A No.

Q Do you remember a retweet?

A I mean, that lists -- I can't read -- is that Cyrillic? Or I don't even know what language that is.

I can represent to you that it is Greek. It is an archived capture of the Twitter account from the day of.

Ms. Bobb. Okay.

And my understanding of this, although you are obviously
welcome to correct me if it's inaccurate, is that this user, Dan30, posted this image, and that you retweeted it. And then that's what the retweet symbol and then the Christina Bobb retweets.

Ms. Bobb. Okay.

Like at the top.

Ms. Bobb. It's fuzzy on my end, but, okay, if that's what happened. Fine.

Q If this is a retweet, why did you think that January 6 would be -- if you did, how is this relevant, the Patriot, Revolution 1776? Why was that relevant to what was happening on January 6?

A Wow. Because from my perspective we had an illegal election. I believe wholeheartedly that not just Democrats, I think it was Democrats in conjunction with -- I think it was the swamp. The swamp rigged and stole the election and the American people lost their voice. And so I think it's very appropriate to hope that President Pence, Vice President Pence will send the votes back to the states, but I think as it stands I think we are in a really bad spot as a country. I do.

Q And I hope you can appreciate this. I mean, one of the things we are looking at is what happened in the Capitol, the violence at the Capitol. And so what you retweeted here, if that's what this is, is an image of violence, of war, of 1776.

So did you think that violence was necessary or appropriate on January 6, 2021, with respect to the joint session of Congress?

A I can't believe you are honestly asking me these questions. There's nothing about my social media account that calls for violence or that asks for violence. I've never done anything violent. I've never called for violence from anybody.

So the idea that I retweet a picture from The Patriot, if that's even in fact what
happened, I don't even remember doing that. It looks like my name is in the thing, but it
doesn't say Christina Bobb retweeted. It says re, re, re, Christina Bobb, re-retweeted. I
don't even know that's me, but maybe it is, but -- no. Absolutely not.

I would never call for violence. I never expected violence and was very
saddened. And I'm really, really saddened by what's happening with our country right
now. I think Democrats have completely destroyed it. It's really, really disgusting, and
I think this inquisition is disgusting. That's what I think.

Q Understood. And that is now on the record, Ms. Bobb. I'm just asking the
questions, only because, you know, we are looking at certain images, and I'm trying to
understand it. So I -- and that's why we want you to explain it?

A So let me ask you this, because you are investigating the
violence -- supposed violence at the Capitol, right? Right? That's what you guys are
supposed to be doing. This is what this committee is for.

Q That's precisely right. We are looking into the events of the attack at the
Capitol?

A Then why aren't you looking into the police officers, and why aren't you
looking into the fact that they did not use the proper protocol for the use of force, the
escalation of force? Why aren't you looking into the fact that they opened the gates,
that they removed the barricades?

Why aren't you looking into the fact that the FBI had an informant and they are
instigating? Why aren't you looking into the fact who were those FBI informants and
what was federal law enforcement doing trying to instigate people to go into the Capitol?
Why aren't you looking at that? You are looking at my Twitter account that maybe or I
may or may not have retweeted some guy who writes in Greek.

Look at the actual facts of what happened. What happened was really
dangerous. Why is it the Democrats refused the assistance that President Trump offered to reinforce with either National Guard or additional troops from DOD? Those offers were turned down. Why? Why?

Like the -- it makes no sense. The stuff that happened at the Capitol could easily be investigated, but like why are you only investigating conservatives? It's like why aren't you looking into how did the violence of 2020 lead up to it. This is a completely one-sided partisan investigation. It's disgusting. And there are people sitting in jail who do not deserve to be in jail because this is a political witch hunt.

Q Ms. Bobb, that's your perspective. We are just asking questions. We are trying to get to the bottom of it, and you'll see what the committee did when all the information comes out from the commit eventually but, you know, you are a witness, a fact witness to certain events.

And I've appreciated your time in answering our questions here today, but that's why we ask the questions is to get an understanding of what they are.

A You didn't ask me what I saw at the Capitol. I just told you I was at the Cannon rotunda and I went out onto the grass and I saw what was out there. And I saw that the police were not using the proper protocols, and they were not preparing the people that the amount of people were actually trying to get the bad actors to stop. That's what I saw.

And why aren't you asking more about that, but you want to hear about some retweet from who knows. I can't even read the guy's name.

Q I think you have said all of that earlier today. And I appreciate your perspective that you offered on what you saw and heard at the Capitol and elsewhere on January 6.

At this point, I do think that we have reached the end. I'll defer to -- do you have
any other questions?

Not about the day of the 6th. No.

Do you have other questions for Ms. Bobb?

I don’t think so.

Okay. Mr. Sibley, is there anything that you would like to add before we go off the record?

Mr. Sibley. No.

All right. Ms. Bobb, is there -- I understand that you have just said a lot and your thoughts on what Congress should be looking into.

Is there anything else that you would like to add before we end today’s session?

Ms. Bobb. I think you need to be looking into the real facts of January 6. I think you need to be looking into the real facts of the election. I think you need to stop using your political authority against your political opponents. You have turned the government against the people, and I think it’s disgusting.

If there’s any documents that you have that we have gone over or that you recall from today or that -- excuse me, you recall exist today that you hadn’t otherwise looked for or found, I would appreciate it if you could get with Mr. Sibley and discuss that, and then Mr. Sibley and I could have a conversation. If there’s not, that’s fine too, but at this point I do think we are finished for the day and we can go off the record.

[The interview was concluded at 5:07 p.m.]
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