

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

CR Action
No. 1:21-670

vs.

Washington, DC
July 20, 2022

STEPHEN K. BANNON,

9:02 a.m.

Defendant.

TRANSCRIPT OF JURY TRIAL - DAY 3 - **MORNING SESSION**
BEFORE THE HONORABLE CARL J. NICHOLS
UNITED STATES DISTRICT JUDGE

APPEARANCES:

For the U.S.:

AMANDA ROSE VAUGHN
MOLLY GULLAND GASTON

U.S. ATTORNEYS OFC. FOR D.C.
555 4th Street NW
Washington, DC 20001
202-252-1793

For the Defendant:

DAVID I. SCHOEN

DAVID I. SCHOEN, ATTORNEY AT LAW
2800 Zelda Road, Suite 100-6
Montgomery, AL 36106
334-395-6611

MATTHEW EVAN CORCORAN

SILVERMAN THOMPSON SLUTKIN WHITE
201 N. Charles Street, 25th Floor
Baltimore, MC 21201
410-385-2225

Reported By:

LORRAINE T. HERMAN, RPR, CRC

Official Court Reporter
U.S. District & Bankruptcy Courts
333 Constitution Avenue, NW
Washington, DC 20001
lorraine_herman@dcd.uscourts.gov

I N D E X

WITNESS

PAGE

KRISTIN AMERLING

Direct Examination by Ms. Vaughn	620
Cross-Examination by Mr. Corcoran	684

E X H I B I T S

EXHIBIT

PAGE

Government's No. 3	Admitted into Evidence	643
Government's No. 4	Admitted into Evidence	651
Government's No. 6	Admitted into Evidence	666
Government's No. 7	Admitted into Evidence	670
Government's No. 8	Admitted into Evidence	676

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

P R O C E E D I N G S

DEPUTY CLERK: Good morning, Your Honor. This is criminal case year 2021-0670, United States of America versus Stephen K. Bannon.

Counsel, please come forward to introduce yourselves for the record beginning with the government.

MS. VAUGHN: Good morning, Your Honor.

Amanda Vaughn and Molly Gaston for the United States, and at counsel table is paralegal specialist Quiana Dunn-Gordon and FBI Special Agent Frank D'Amico.

THE COURT: Good morning.

MR. CORCORAN: Good morning, Your Honor.

Evan Corcoran, David Schoen and Riane White on behalf of defendant Stephen Bannon, who is present this morning.

THE COURT: Good morning, everyone.

I understand there is an issue the government would like to raise outside of the presence of the jury.

MS. VAUGHN: Yes, Your Honor.

The government noted multiple news reports last night that reported the defendant's opening as an argument that this was a politically-motivated prosecution. And if lay people in the media understood it that way, then certainly some of the lay people on the jury did.

So this effort to turn this case into a political

1 circus and a case about politics is why the government moved
2 in limine to exclude these arguments. The Court granted it.
3 But it seems the defendant is trying to find ways around it.

4 And the reason we want to bring it up this morning
5 is because we think it's going to come up with both
6 witnesses today, and we're not sure there's going to be a
7 break before the defendant begins to question the first
8 witness. So we want to make sure that there are protections
9 in place, because the first question shouldn't even be
10 allowed to be asked.

11 So there are two ways that we foresee the
12 defendant trying to claim that he can ask about political
13 motivations here. One is bias. A claim that an individual
14 member of Congress' motives to subpoena the defendant or
15 refer him for contempt is somehow relevant or somehow goes
16 to bias. It does not.

17 As we have briefed extensively, as SCOTUS has made
18 clear, bias is only relevant as to the individual testifying
19 witness's motive or reason to testify inaccurately because
20 they favor one side or the other.

21 So when Ms. Amerling is testifying, there
22 shouldn't be one question about the personal motivations of
23 Representative Thompson in subpoenaing the defendant. There
24 shouldn't be one question about why one person or another
25 voted for contempt.

1 I mean, the Supreme Court slammed the door on that
2 50 years ago in *Barenblatt* and *Watkins*, and it doesn't go to
3 Ms. Amerling's bias. There shouldn't be one question about
4 whether the House of Representatives is a body concerned
5 with politics.

6 They need to articulate a good faith basis to ask
7 the specific witness about that specific witness's potential
8 for bias.

9 **THE COURT:** So just let me understand this. You
10 agree that Mr. Bannon can attempt to show that a particular
11 witness is biased. And then the question is just, What is
12 fair game for the particular witness?

13 So as to Ms. Amerling, what, in your view, is or
14 is not fair game as to her bias?

15 **MS. VAUGHN:** If she -- if they have a good-faith
16 basis to ask her about her favor about one side or the other
17 in this case, they can do that. They cannot ask her --

18 **THE COURT:** It seems to me that is consistent with
19 where I was on your Motion in Limine where I said -- or
20 something to the effect of -- Government asked me to
21 preclude Mr. Bannon from making improper arguments that
22 politicalize the case. I agree that such arguments would be
23 inappropriate. This is not a forum for partisan politics,
24 and I will not allow it to become one. But I will not
25 prevent the defendant from attempting to show bias when

1 cross-examining witnesses. There's a fine line to be drawn
2 here, and I expect the parties to respect it.

3 So there are some questions, in your view, that
4 would be appropriate as to Ms. Amerling but not others?

5 **MS. VAUGHN:** Yes, Your Honor.

6 And given the opening yesterday and the clear
7 implications that it made, there are processes that this
8 Court can use to make sure that not even the first
9 inappropriate question gets out.

10 I think there is a clear record here now that the
11 defendant plans to try to skirt this Court's order. And the
12 government thinks it would be appropriate and warranted
13 under the rules.

14 Rule 103 provides explicitly for this situation to
15 require the defendant to proffer the specific questions he
16 plans to ask on this, outside the presence of the jury, so
17 the jury doesn't hear one more word about this case being a
18 political prosecution.

19 **THE COURT:** ,Okay. That's bias.

20 **MS. VAUGHN:** The second way the government thinks
21 that this is going to come up is this idea of testing the
22 thoroughness of the investigation.

23 Yesterday defense counsel claimed that asking an
24 FBI agent about the vote count of the referral and whether
25 they interviewed people who voted against it is somehow

1 about testing the thoroughness of investigation; that is a
2 half statement of the law.

3 Defendants are allowed to ask questions about
4 investigative steps that law enforcement took when they have
5 a good faith basis to believe there is an exculpatory piece
6 of evidence that the investigators either knew about or
7 should have known about and didn't follow up on. This comes
8 up in murder cases where investigators have information that
9 someone else committed the offense and they didn't follow up
10 on it.

11 They are not allowed to just ask law enforcement
12 about what they did and did not do to suggest there is some
13 mystery piece of exculpatory information that no one knows
14 about. So what piece of exculpatory information does some
15 random member of Congress that voted against referral have
16 about whether the defendant got a subpoena, whether he
17 defied the deadlines and whether his defiance was willful?

18 What they actually want to do here is to suggest
19 to the jury that it is somehow persuasive evidence that
20 members of Congress, which they have now characterized as a
21 solely-political body, did not vote to refer the defendant
22 for contempt.

23 The vote count of that referral is irrelevant. It
24 goes just to the political biases and motives of potential
25 members, which is irrelevant to the facts and the elements

1 that the jury is being asked to decide.

2 In fact, I don't even think they have a good faith
3 basis to ask why or whether the law enforcement interviewed
4 Bennie Thompson. They haven't identified a piece of
5 exculpatory information that he might have. So they can't
6 use these principles of cross-examination to cover their
7 effort to inject politics and suggest that this is
8 politically motivated.

9 So we think, again, that before the defendant is
10 allowed to ask a single question on that issue, he should be
11 required to proffer the questions outside of the jury's
12 presence.

13 **THE COURT:** Thank you, Ms. Vaughn.

14 Mr. Corcoran, let's start with bias.

15 I've already decided -- I mean, I issued my ruling
16 such that it was because it was fairly acontextual about
17 politicizing this case, but I did recognize that you asked
18 questions about bias. But don't you agree that it has to be
19 limited to the bias of the particular witness?

20 **MR. CORCORAN:** Well --

21 **THE COURT:** I got a witness testifying. Bias
22 cross-examination is about whether the witness is biased.

23 **MR. CORCORAN:** I understand, Your Honor, yeah.

24 I mean, the answer is, the witness is on the
25 stand, and our cross-examination will depend on the

1 testimony of the witness. I know government counsel would
2 love a script of our cross-examination, which can't be
3 produced until the witness testifies.

4 In terms of bias, we are certainly able to ask her
5 about anything that we find would bear on her credibility.
6 And the jury instruction sets out, in terms of adjudicating
7 the credibility of the witnesses, the bounds of that. And
8 that's what we're going to stick within. I know counsel
9 seems to be worried about us turning this into a political
10 circus. That's not our intention and that was not done in
11 opening.

12 I stand by the opening. And I think it was
13 clearly on the line, and there was nothing to say that
14 anything other than the evidence that they're going to hear
15 in this case, that they have to listen to it carefully to
16 determine whether there's bias.

17 **THE COURT:** Okay.

18 So here, as to both witnesses, at least the two
19 the government has said it will call, you're limited to
20 asking questions about why that witness might be biased.
21 And to the extent that you start to ask questions that veer
22 into whether someone else, who is not the witness, might be
23 biased, either as a body or as an individual, will in my
24 view be inappropriate.

25 And to the extent that I think the questions are

1 getting into that, I will stop you and I will require you to
2 proffer before completing the question, why you think that
3 the question, rather than going to the -- why it goes to the
4 specific witness's bias rather than something else.

5 **MR. CORCORAN:** I don't -- I understand the Court's
6 ruling, and I don't envision this to be a stop-and-go
7 cross-examination based on what's been said this morning.

8 I do want to identify one other issue to keep in
9 mind -- so if there is some objection, and if there is some
10 follow-up -- and that is, part of our Sixth Amendment right
11 to confrontation involves questioning and eliciting
12 information about a witness against Mr. Bannon.

13 And in this case, the witness who is on the stand
14 is staff, but she is testifying about things that were done,
15 actions that were taken by members of Congress, including
16 Chairman Thompson. And we're about to hear, I know, a
17 discussion about a series of letters that will represent
18 actions taken by Chairman Thompson. I know, because of the
19 Court's ruling, that we're not talking about the content of
20 the letter, and they're not being introduced for that
21 purpose.

22 But he's taken actions. And to the extent that
23 our cross-examination can get at the actions that are taken
24 by anyone involved with the Committee, that are being
25 presented through this witness, we need to have the ability

1 to do that. And I think it can be done without crossing the
2 line of fair examination.

3 **THE COURT:** So I just want to -- I understood the
4 point, but what I couldn't quite get at the end is, and
5 therefore what?

6 Are you saying that you believe that you are
7 allowed to ask the witness testifying about the bias or
8 potential bias of anyone on the Committee?

9 **MR. CORCORAN:** Yes.

10 Let's say she says, Chairman Thompson did X. I'm
11 allowed to ask her if she knows, Did Chairman Thompson do X
12 because of this issue? And she can answer yes or no.

13 But I certainly, through this witness, I can get
14 at whether she knows whether any action was taken by
15 Chairman Thompson.

16 **THE COURT:** What about members of the Committee
17 other than Chairman Thompson?

18 **MR. CORCORAN:** I don't plan to ask about any other
19 members at this stage.

20 **THE COURT:** So I'll hear from Ms. Vaughn on that
21 question.

22 So now let's turn to the -- no, no, no. Hold on a
23 second. I apologize. What I meant was I want to hear from
24 her on that, the bias question. But she also raised the
25 question whether and to what extent you can ask questions of

1 the agent witness about the thoroughness of the
2 investigation.

3 **MR. CORCORAN:** Yeah, it's totally fair game. I
4 know she mentioned something in the murder context where
5 there's some suggestion that we're -- that the defendant is
6 talking about a mystery culprit or something like that.
7 That's not it at all.

8 What we said yesterday when the husher was on and
9 what we stand by, which is, if there's an agent on the stand
10 who says, I took these steps in this investigation. I'm
11 investigating whether a crime took place, and I interviewed
12 this person, A, B and C. I'm allowed to ask them, Why
13 didn't you? If you didn't, why didn't you interview person
14 D, who was present, who had knowledge and who, you know, for
15 instance, expressed on the House floor a view of what
16 happened? Totally fair game.

17 And, you know, it's not telling the jury that --
18 it's telling the jury that, when they're evaluating an
19 investigator's decision-making about whether a crime was
20 committed, that they interviewed and considered all
21 available evidence that might be exculpatory.

22 **THE COURT:** Thank you.

23 **MR. CORCORAN:** Thank you, Your Honor.

24 **THE COURT:** So, Ms. Vaughn, let's start with the
25 bias point.

1 **MS. VAUGHN:** Your Honor, I think Mr. Corcoran just
2 admitted that they want to ask whether issuing the subpoena
3 or requiring him to comply was politically motivated.

4 I don't know how much more clearly the Supreme
5 Court could have said in *Watkins* and *Barenblatt* that that is
6 irrelevant. They can ask questions about, is this category
7 of records that you're seeking pertinent to the
8 investigation? They can do that all they want.

9 **THE COURT:** They can ask -- it's clear that they
10 can ask questions that go to whether the particular witness
11 and her testimony is biased.

12 **MS. VAUGHN:** Yes.

13 **THE COURT:** Now, the question is -- because
14 Chairman Thompson is not here and is at least the signatory
15 of the letters and is the Chairman of the Committee and is
16 the one who had the authority, as she testified yesterday,
17 to have signed the subpoenas -- they can ask about when he
18 did those things that he's not here himself to testify
19 about, whether he was biased in doing so. And your view is
20 that is out of bounds because bias cross-examination goes to
21 testimony.

22 **MS. VAUGHN:** Yes.

23 What they are trying to argue about instead is
24 that somehow the subpoena itself was illegitimate and
25 politically motivated or that --

1 **THE COURT:** Okay. I have that.

2 So here's my ruling on this question: The
3 defendant may ask questions that go to whether the witness
4 we have here is biased in her testimony but may not ask
5 questions whether someone else was biased in an action that
6 they took outside of this courtroom.

7 Even as to her bias, I get that there are some --
8 that there may be some questions that cross the line, and I
9 will police that line the best that I can. Okay?

10 So now let's talk about the investigation, the
11 completeness of the investigation.

12 **MS. VAUGHN:** Yes.

13 So I heard Mr. Corcoran say --

14 **THE COURT:** Why wouldn't that go to, for example,
15 pertinency?

16 You know, one of the elements here is that the
17 subpoena has to be pertinent to the investigation, the
18 information sought has to be pertinent. Did you, Agent, in
19 deciding and investigating whether it was, in fact,
20 pertinent, who did you talk to? Did you talk to these
21 people who might have had a different view?

22 **MS. VAUGHN:** So that line of questioning, and what
23 I heard Mr. Corcoran say is that somehow it is relevant. He
24 said, The jury is going to be asked to evaluate
25 investigators' decisions about whether a crime had been

1 committed. That's inappropriate.

2 We would never suggest to the jury that they
3 should find a crime has been committed because a police
4 officer thinks one has been. And this is exactly, sort of,
5 the cover that the government thinks the defendant is trying
6 to use to say, Well, you didn't interview Representative
7 McCarthy, who didn't think that these facts met the elements
8 of the crime.

9 Whether Representative McCarthy thought the facts
10 met the elements of the crime is irrelevant. The question
11 is, Did the investigators ignore some exculpatory evidence?

12 And with respect to attorneys' questions across
13 the board, we always have to have a good faith basis to ask
14 about a fact. We have to have a good faith basis to believe
15 that there is a fact there and just to ask --

16 **THE COURT:** Okay.

17 Here's where I am on this one. I'm going to take
18 it under advisement. It seems to me that we are not at the
19 cross-examination of the agent stage yet. I want to reflect
20 on this. I understand the government's position. I
21 understand your position, Mr. Corcoran, Mr. Bannon.

22 I, at a minimum, will reserve until we finish with
23 Ms. Amerling and perhaps until we finish with the direct of
24 the agent witness. Okay? But I understand the positions.

25 **MS. VAUGHN:** And one other thing I wanted to note

1 is also the questions about the vote count of the referral.
2 We think should that be precluded entirely because the
3 body -- the House is a body. It acts as a body.

4 The specific vote count is irrelevant. And it
5 suggests -- it improperly suggests to the jury that because
6 certain members of Congress didn't want this to be
7 investigated, it's somehow persuasive evidence that a crime
8 didn't occur.

9 **THE COURT:** Right. I understand.

10 I think to think through that, I need to see the
11 rest of Ms. Amerling's testimony and, to the extent that
12 it's not relevant in her cross, the agent's testimony. So
13 I'll treat that as -- I understand the point.

14 I, again, do not intend for this to become a
15 political case, a political circus, forum for partisan
16 politics. You have acknowledged, and I have as well, that
17 bias of a witness is relevant, but it has to be about the
18 witness testifying.

19 This question, it's not even clear to me that it's
20 going to be within the scope of the direct of either
21 witness, so I understand the point. I'm going to take that
22 under advisement as well and police as I feel appropriate.
23 Okay?

24 Thank you.

25 **MS. VAUGHN:** Thank you.

1 **THE COURT:** Mr. Schoen, good morning.

2 **MR. SCHOEN:** I'm sorry. I just think there's one
3 other issue that ought to be raised so we don't run into
4 problems on cross and so that I can preserve the record.

5 The government yesterday -- we've been told since
6 the start of this case, of course, that the reason
7 Mr. Bannon didn't comply with the subpoena is irrelevant.
8 He got a valid subpoena. Didn't show up. Unless it was an
9 accident, it's not irrelevant.

10 Yesterday the government opened and told the jury
11 that Mr. Bannon got the subpoena, and he decided he's above
12 the law. That's a reason. He decided he's above the law.
13 And it's not a reason that comports with the facts as we
14 know them to be. That is, Mr. Bannon, according to the
15 Costello affidavit and so on -- declaration and so on,
16 believed he was fully complying with the law; that he wasn't
17 permitted to comply with the subpoena; that his lawyer told
18 him, You can't comply with the subpoena. He thought he was
19 complying with the law, not above the law.

20 As I understand it, at least, we will not be able
21 to go into, on cross-examination, the reasons that
22 Mr. Bannon gave to the Committee as to why he didn't comply;
23 that is, he relied on his advice of counsel --

24 **THE COURT:** I understand the reasons.

25 **MR. SCHOEN:** Yes, Your Honor.

1 And, therefore, I think that raises now a right of
2 confrontation violation because the jury has been told his
3 reason was he decided he was above the law. I don't think
4 you can have it both ways, say reason is irrelevant and the
5 defense is barred from showing what their reason was.

6 So questions to Ms. Amerling would be along these
7 lines that, you know, Mr. Bannon clearly told you through
8 Costello that he relied on the advice of counsel that he
9 wasn't complying because executive privilege barred him from
10 complying.

11 All of those kinds of things we talked about,
12 those are all barred as defenses.

13 **THE COURT:** I understand the point.

14 **MR. SCHOEN:** Thank you, Your Honor.

15 **THE COURT:** Ms. Vaughn, what is your response to
16 this?

17 **MS. VAUGHN:** Your Honor, again, as we've said many
18 times, we have to show that there was not some lingering
19 objection that hadn't been resolved. That's the point.

20 The argument about the defendant being -- deciding
21 he's above the law, we have to prove that his violation of
22 the subpoena was deliberate. A choice not to comply, in our
23 view, is a decision that you are above the authority of
24 Congress.

25 **THE COURT:** Yeah, it may have not been, in light

1 of all of the rulings I've made, the most artful choice.
2 But it seemed to me that you were very likely making the
3 point that the defendant did not comply with the subpoena in
4 the way that the government alleges he was required to do,
5 and in that sense was acting as if he was above the law.
6 And for that reason, I do not believe, as I said yesterday,
7 that we opened the door to all issues that heretofore have
8 been excluded.

9 So I am not -- so the point is preserved for the
10 record, Mr. Schoen. To the extent this is a motion to
11 reconsider those prior rulings or to permit evidence that
12 was previously excluded because of the opening, it's denied.
13 Okay?

14 **MS. VAUGHN:** And I'll note too if the defense
15 would like to go back to us redacting the letters, we can do
16 that. We're just trying to establish that there wasn't an
17 outstanding objection that has to be resolved.

18 **MR. SCHOEN:** Your Honor, let me make clear then
19 for the record, this has nothing to do with redacting the
20 letters. The defense in this case --

21 **THE COURT:** I'm on it. I got it.

22 **MR. SCHOEN:** I have to say this, Judge, if I may.
23 The defense was: I complied with the law. I followed the
24 law. I did what the law required me to do.

25 **THE COURT:** Mr. Schoen, your point is very well

1 articulated already. It's on the record. Just because the
2 government has a view of it doesn't mean you haven't made
3 the point. I understand the point.

4 **MR. SCHOEN:** Thank you, Your Honor.

5 **THE COURT:** Ms. Lesley, could you please bring the
6 jury in?

7 **DEPUTY CLERK:** Should we bring the witness in,
8 Your Honor, or do you want us to wait?

9 **THE COURT:** Bring the witness in. Thank you for
10 asking.

11 Good morning, ma'am.

12 **THE WITNESS:** Good morning, Your Honor.

13 **THE COURT:** We are just going to bring the jury
14 in.

15 (Jury entered the courtroom at 9:26 a.m.)

16 **DEPUTY CLERK:** Your Honor, we are now back on the
17 record.

18 **THE COURT:** Good morning, everyone. Thanks for
19 being here again this morning.

20 I wanted to make just one housekeeping notice,
21 which relates to the wearing of masks in this courtroom and
22 as you retire to the break room and then deliberate.

23 My view is that in the break room, essentially in
24 the courtroom that you are in, you are free to wear masks or
25 not as you would choose. If you want to have a conversation

1 about it, that's fine too. But in my view, people should
2 feel free -- you 14 should feel free to essentially decide
3 as a group however you would like to behave there.

4 As for the courtroom, now that we have a jury, now
5 that we are up and running, my view is that no one inside
6 the well, so basically the front row, which includes members
7 of my staff, counsel table, the jury in the courtroom here,
8 is required to wear a mask.

9 So people inside the well, anyone inside the well
10 may, if he or she likes, take off your mask, but you are not
11 required to.

12 I would ask that everyone else -- I will not even
13 ask -- I would require everyone else who's not inside the
14 well, partly because those people are coming in and out and
15 the like, to keep your masks on.

16 So with that, Ms. Vaughn.

17 **MS. VAUGHN:** Thank you, Your Honor.

18 **DIRECT EXAMINATION OF KRISTIN AMERLING (CONTINUED)**

19 **BY MS. VAUGHN:**

20 **Q.** Good morning, Ms. Amerling.

21 **A.** Good morning.

22 **Q.** Yesterday when you were testifying, we left off --
23 we were talking about the subpoena that the Select Committee
24 had issued to the defendant. So I would like to pick up
25 there.

1 **MS. VAUGHN:** Ms. Dunn-Gordon, if we could bring up
2 Government's Exhibit 2, which is already in evidence.

3 **BY MS. VAUGHN:**

4 **Q.** And, Ms. Amerling, just to remind us all where we
5 are, we had talked about this page yesterday, the actual
6 subpoena. And can you just remind us when and at what --
7 what day and what time the subpoena required the defendant
8 to provide documents relating to his involvement in
9 January 6th?

10 **A.** Yes. The document production deadline was
11 October 7th, 2021, at 10:00 a.m.

12 **Q.** And can you remind us when the defendant was
13 supposed to appear for his deposition to answer questions
14 about his involvement in January 6th?

15 **A.** The time for his deposition was October 14th,
16 2021, at 10:00 a.m.

17 **MS. VAUGHN:** I'd like to go to Page 3 of
18 Government's Exhibit 2.

19 **BY MS. VAUGHN:**

20 **Q.** Ms. Amerling, is this another document or page
21 that was included with the subpoena that went to the
22 defendant?

23 **A.** Yes, it was.

24 **Q.** And can you just explain for the jury what purpose
25 this page serves within the subpoena document that's sent to

1 the defendant?

2 **A.** This is a letter that informs the recipient of the
3 subpoena about the purpose and authority for the
4 investigation that the Select Committee is conducting and
5 gives the recipient a sense of the kinds of information that
6 the Select Committee is seeking.

7 **Q.** And is this letter sent on behalf of the
8 Committee?

9 **A.** Yes, it is.

10 **Q.** And in your role as the Deputy Staff Director and
11 Chief Counsel, did you participate in putting this entire
12 10-page document together for the defendant?

13 **A.** I did.

14 **Q.** So who is this letter from or who signs on behalf
15 of the Committee?

16 **A.** The Chairman signs the letter, Chairman Bennie
17 Thompson.

18 **Q.** We see at the top that the letter is to
19 Mr. Bannon, care of his counsel, which you discussed
20 yesterday. So let's look at some of what the Committee told
21 the defendant about the subpoena?

22 **MS. VAUGHN:** Ms. Dunn-Gordon, could we zoom in on
23 the first two paragraphs, please?

24 **BY MS. VAUGHN:**

25 **Q.** All right. So after the greeting it says,

1 "Pursuant to the authorities set forth in House Resolution
2 503 and the rules of the House of Representatives." House
3 Resolution 503, is that what we were looking at earlier
4 yesterday, the resolution that authorized the Committee?

5 **A.** That's correct.

6 **Q.** And then it says that "The Select Committee hereby
7 transmits a subpoena compelling you to produce the documents
8 set forth in the accompanying schedule by October 7th and to
9 appear for a deposition on October 14th."

10 Can you just explain briefly what is meant by
11 "compelling"?

12 **A.** That's a reference to the fact that the letter
13 accompanies a subpoena that requires the recipient to
14 produce the documents by that deadline and appear for a
15 deposition by the deadline stated under the potential threat
16 of criminal liability for refusing to comply.

17 **Q.** And the second paragraph there, can you please
18 read that paragraph?

19 **A.** It says, "The Select Committee is investigating
20 the facts, circumstances, and causes of the January 6th
21 attack and issues relating to the peaceful transfer of
22 power, in order to identify and evaluate lessons learned and
23 to recommend to the House and its relevant committees,
24 corrective laws, policies, procedures, rules or regulations.
25 This inquiry includes examination of how various individuals

1 and entities coordinated their activities leading up to the
2 events of January 6, 2021."

3 Q. Ms. Amerling, there's a reference there -- we
4 talked yesterday about the January 6th attack. But there's
5 a reference there to the investigation into the "peaceful
6 transfer of power". What is that referring to?

7 A. That is the part of our democratic process that
8 involves the transfer of power when an incumbent President
9 loses an election and transfers power to the incoming
10 President who is elected.

11 Q. And so was the transfer of power between the
12 former President and the new President an issue that the
13 Committee was focused on?

14 A. That's correct. One of the events of January 6
15 was the joint session of Congress where the House and Senate
16 certify the vote that the American public has cast in the
17 presidential election.

18 MS. VAUGHN: Ms. Dunn-Gordon, can we zoom in on
19 the bottom part of this letter?

20 BY MS. VAUGHN:

21 Q. So the next paragraph starts with "The Select
22 Committee has reason to believe that you have information
23 relevant to understanding important activities that led to
24 and informed the events of the Capitol on January 6th,
25 2021."

1 Does the paragraph then go on to list some of the
2 reasons the Committee had a reason to believe the defendant
3 might have information relevant to its investigation?

4 **A.** That's correct.

5 **Q.** And what is the purpose of informing the defendant
6 the reasons that the Committee thinks he might have relevant
7 information?

8 **A.** So the individual can have a sense of the type of
9 the information that the Committee was seeking from him or
10 her.

11 **Q.** What is the first reason that the letter told the
12 defendant the Committee had --

13 **MR. CORCORAN:** Your Honor, we ask for a limiting
14 instruction again.

15 **THE COURT:** Yes.

16 So, as I said yesterday, this page, as you may
17 recall, ladies and gentlemen of the jury, is admitted for
18 the purpose of demonstrating that it was provided -- it was
19 the Committee's position and was provided to Mr. Bannon.
20 But it is not -- I am not admitting it for the proof -- to
21 prove, for example in this paragraph, whether it is in fact
22 true, the assertions that are in here.

23 This is being admitted to show that this was the
24 Committee's position, not what the Committee was saying
25 about these subjects in this paragraph are, in fact, true.

1 **MS. VAUGHN:** Thank you, Your Honor.

2 **BY MS. VAUGHN:**

3 **Q.** Ms. Amerling, what is the first reason that the
4 letter told the defendant the Committee believed he had
5 relevant information?

6 **A.** The letter says, "You have been identified as
7 being present at the Willard Hotel on January 5th during an
8 effort to persuade members of Congress to block the
9 certification of the election the next day and in relation
10 to other activities on January 6th."

11 **Q.** All right. And January 5th, the day before the
12 attack -- what is the Willard hotel?

13 **A.** The Willard Hotel is a hotel in Washington, D.C.,
14 where it had been reported at that time that numerous
15 individuals who were involved in discussing potential plans
16 and strategies relating to the events of January 6th were
17 staying or were meeting.

18 **Q.** And the reference to block the certification of
19 the election, is that the same thing that you were talking
20 about earlier about the joint meeting of Congress to
21 finalize the transfer of power?

22 **A.** That's correct.

23 **Q.** What is the next thing that the letter explains to
24 the defendant about why the Committee believed he had
25 relevant information?

1 **A.** The next sentence says, "You are also described as
2 communicating with then-President Trump on December 30,
3 2020, and potentially other occasions, urging him to plan
4 for and focus his efforts on January 6th."

5 **Q.** Then, finally, it says, "Moreover, you are quoted
6 as stating on January 5th that all hell is going to break
7 loose tomorrow."

8 Now, the paragraph ends with "Accordingly, the
9 Select Committee seeks both documents and/or deposition
10 testimony regarding these and multiple other matters that
11 are within the scope of the Select Committee's inquiry."

12 So the three things that are listed here, were
13 those the only things that gave the Committee a reason to
14 believe the defendant might have information relevant to
15 this investigation?

16 **A.** No, they were intended to be a representative
17 sample.

18 **Q.** All right.

19 Yesterday when we were looking at the subpoena
20 itself, we saw a reference to a schedule of things that the
21 subpoena required the defendant to provide by October 7th.
22 So I want to take a look at that now.

23 **MS. VAUGHN:** Ms. Dunn-Gordon, if we could go to
24 Page 4 of Government's Exhibit 2.

25

1 **BY MS. VAUGHN:**

2 **Q.** Ms. Amerling, this document is titled "Schedule"
3 and is this the list of items that the subpoena required the
4 defendant to provide?

5 **A.** That's correct.

6 **Q.** All right. And does it actually continue on to
7 the next page as well?

8 **A.** It does.

9 **Q.** All right. There is an introductory paragraph
10 there. I want to start by looking at that.

11 **MS. VAUGHN:** Ms. Dunn-Gordon, if we could zoom in
12 to that.

13 **BY MS. VAUGHN:**

14 **Q.** And, Ms. Amerling, could you please read this
15 paragraph for us?

16 **A.** It says, "In accordance with the attached
17 Definitions and Instructions, you, Stephen K. Bannon, are
18 hereby required to produce all documents and communications
19 in your possession, custody, and control, including any such
20 documents or communications stored or located on personal
21 devices (e.g., personal computers, cellular phones, tablets,
22 etc.), in personal or campaign accounts and/or on personal
23 or campaign applications (e.g. email accounts, contact
24 lists, calendar entries, etc.) referring or relating to the
25 following items. If no date range is specified below, the

1 applicable dates are for the time period April 1, 2020
2 through the present."

3 **Q.** It says, "documents or communications stored in
4 personal or campaign accounts or on personal or campaign
5 applications." Can you explain what is meant there by a
6 reference to a personal or a campaign account?

7 **A.** Yes. Mr. Bannon and others who we have subpoenaed
8 as part of this investigation, some of them have played
9 roles in campaigns. So to the extent that there is
10 information relevant to the subpoena that's in a
11 campaign-related account, that's what that's referring to.
12 Personal accounts are personal emails and other documents
13 that might be in an individual's personal possession.

14 **Q.** Then let's look at the rest of this schedule. So
15 how many categories of documents did the subpoena require
16 the defendant to provide to the Committee?

17 **A.** Seventeen categories.

18 **Q.** And, generally, how did the Committee identify
19 each of these categories of documents as items that the
20 defendant might have information about?

21 **A.** These categories cover activities that the Select
22 Committee had reviewed and researched that related to the
23 events that took place on January 6th.

24 **Q.** And in your role, did you participate in putting
25 this list together?

1 **A.** I did, yes.

2 **Q.** And did each of the categories of records listed
3 here relate to the investigation in some way?

4 **A.** They did.

5 **Q.** All right. Let's look at a few examples.

6 **MS. VAUGHN:** So, Ms. Dunn-Gordon, could we just
7 zoom in on the first two, please?

8 **BY MS. VAUGHN:**

9 **Q.** Ms. Amerling, what is the first category that the
10 defendant was required to produce documents relating to?

11 **A.** It reads: "The January 6th, 2021, rally on the
12 mall and Capitol grounds in Washington, D.C. in support of
13 President Donald J. Trump and opposition to certification of
14 the results of the 2020 presidential election, including any
15 permitting, planning, objectives, financing and conduct, as
16 well as any communications to or from any person or group
17 involved in organizing or planning for the January 6th,
18 2021, rally."

19 **Q.** Ms. Amerling, you mentioned yesterday the actual
20 breach of the Capitol, but what is the reference there to a
21 rally on the mall?

22 **A.** There was a rally in the area of the White House
23 that took place immediately preceding the attack on the
24 United States Capitol.

25 **Q.** And so how did the permitting or the planning or

1 things like that related to that rally relate to the
2 Committee's investigation into January 6th?

3 **A.** Many of the individuals who participated in the
4 attack on the Capitol said that they were motivated by a
5 belief that the election had been stolen. Many of those
6 individuals also had attended the rally that immediately
7 preceded the attack on the Capitol where numerous speakers
8 at the rally had reiterated the claim that the election had
9 been stolen and directed participants to march on the
10 Capitol. The Select Committee is reviewing the extent to
11 which there is a connection between these events.

12 **Q.** Let's turn to item 2. Can you please read that
13 item?

14 **A.** It says, "Then-President Trump's participation in
15 the January 6, 2021 rally, including any communications with
16 President Trump or any paid or unpaid attorney, advisor, aid
17 or assistant to President Trump, relating to the nature,
18 context or content of President Trump's intended or actual
19 remarks to those attending the January 6, 2021, rally."

20 **Q.** Can you explain how the defendant's potential
21 communications relating to the former President's remarks at
22 the rally were relevant to the Committee's investigation?

23 **A.** Yes. The former President was among those at the
24 rally who reiterated the claims that the election had been
25 stolen and directed participants to march the Capitol.

1 We understood that Mr. Bannon had been in
2 communication with the President in the weeks leading up to
3 the January 6th events, and we wanted to understand what he
4 could tell us about the connection between any of these
5 events.

6 **Q.** And was it the Committee's understanding that the
7 defendant had a formal role in the former President's White
8 House or with respect to his campaign?

9 **A.** The Committee's understanding was that Mr. Bannon
10 was a private citizen.

11 **Q.** So what information did the Committee have that
12 led it to believe that he might have records relating to
13 ongoing communications with the former President?

14 **A.** There had been a number of public reports stating
15 that Mr. Bannon had been in communication with White House
16 officials, including former President Trump, in the weeks
17 leading up to the January 6th events.

18 **Q.** Let's look at a couple of other examples from this
19 list.

20 **MS. VAUGHN:** Ms. Dunn-Gordon, if we could zoom in
21 on 5 and 6, please.

22 **BY MS. VAUGHN:**

23 **Q.** Ms. Amerling, Number 5 relates to records relating
24 to the "The War Room podcast." Can you explain what "The
25 War Room podcast" is a reference to?

1 **A.** That is a reference to the podcast run by
2 Mr. Bannon.

3 **Q.** And how did records relating to the War Room
4 podcast relate to the Committee's investigation?

5 **A.** On the War Room podcast, Mr. Bannon had, in the
6 weeks leading up to the January 6th attack, made repeated
7 claims that the election had been stolen. And the day
8 before the attack had made statements including, "All hell
9 is going to break loose tomorrow," and other statements that
10 suggested that he might have had advanced knowledge of the
11 events that were going to take place on January 6th.

12 **Q.** And Item 6 there asks for records relating to
13 "March for Trump". What is that referring to, "March for
14 Trump"?

15 **A.** That is one of the organizations that we
16 understood was involved with publicizing the rally and
17 helping encourage people to come to D.C. for the events of
18 January 6th.

19 **Q.** Let's look at a few more examples on the next
20 page.

21 **MS. VAUGHN:** Ms. Dunn-Gordon, if we could go to
22 the next page and zoom in on Items 11 and 12, please.

23 **BY MS. VAUGHN:**

24 **Q.** All right. Ms. Amerling, Number 11 asks for
25 "Records relating to anyone with whom you communicated by

1 any means with respect to efforts, plans or proposals to
2 contest the 2020 presidential election results or delay,
3 influence or impede the electoral count, including but not
4 limited to communications with Boris Epshteyn, Kashyap
5 Patel, and Ezra Cohen-Watnick."

6 First, this reference to the electoral count, what
7 is that a reference to?

8 **A.** That's what -- the count of the electors that took
9 place in a Joint Session on January 6th.

10 **Q.** And the names that are listed here, who are they?

11 **A.** Based on public accounts, we had understood that
12 Boris Epshteyn was an outside advisor to the President and
13 his associates, and he had been engaged in helping promote
14 claims that the election had been stolen.

15 Kashyap Patel and Ezra Cohen-Watnick were both
16 high-ranking officials in the Defense Department, and one of
17 the responsibilities of the Select Committee was to
18 investigate the role of federal agencies, including the
19 Defense Department, in preparing for and defending against
20 the attack on the Capitol.

21 **Q.** So with that, how -- if the defendant had had any
22 communications with these individuals, how would that have
23 related to the Committee's investigation?

24 **A.** The Committee was charged and is charged with
25 investigating the facts, circumstances and causes of the

1 January 6th attack on the Capitol and interference with the
2 peaceful transfer of power.

3 Information we were seeking from this subpoena and
4 from other efforts to obtain information informs the
5 Committee's understanding of the attack.

6 **Q.** Item 12 says -- or requires "Records relating to
7 all public relations, advertising or other communications
8 efforts to persuade Americans that the election was stolen
9 or to attend the rally on January 6th."

10 How were records relating to that relevant to the
11 Committee's investigation?

12 **A.** Committee's investigation was looking at the facts
13 and circumstances leading to the attack, including
14 statements and activities that might have motivated or
15 influenced the attack.

16 As I described earlier, many of the individuals
17 who participated in the attack said they were motivated by a
18 belief that the election had been stolen.

19 **Q.** And what was it the Committee thought the
20 defendant might have related to this item?

21 **A.** We were looking for information that may have been
22 able to shine a light on why he was making statements that
23 the election was stolen.

24 **Q.** All right. I want to look at just a couple more.

25 **MS. VAUGHN:** Ms. Dunn-Gordon, if we could zoom in

1 on items 15 through 17.

2 **BY MS. VAUGHN:**

3 Q. Ms. Amerling, what is item 15?

4 A. It demands information on "Any communication
5 regarding any of the foregoing topics with Proud Boys, Oath
6 Keepers, Three Percenters and Alex Jones.

7 Q. And what is that a reference to?

8 A. This is an effort to ask Mr. Bannon whether he has
9 information relating to several groups who had members who
10 were among those who participated in the attack on the
11 Capitol, Proud Boys, Oath Keepers and Three Percenters.

12 Mr. Alex Jones was a media figure who had been
13 making repeated claims publicly on his platforms in the
14 weeks leading up to the attack that the election had been
15 stolen.

16 And, again, the Committee was seeking information
17 relevant to understanding the relationship or potential
18 relationship between the different individuals and
19 organizations that played a role in the events of
20 January 6th.

21 Q. And when you say "the relationship or potential
22 relationship," are you referring to any relationship that
23 the defendant may have had with these individuals?

24 A. We wanted to ask him what he knew.

25 Q. And with respect to this item, what does that --

1 what do you mean by that, "what he knew"?

2 **A.** What did he know, if he did know anything, about
3 the relationship that the Proud Boys, Oath Keepers,
4 Three Percenters and Alex Jones may have had to the events
5 of January 6th.

6 **Q.** Ms. Amerling, what is item 16?

7 **A.** Item 16 asks for "Any communications with
8 Representative Scott Perry and/or other members of Congress
9 about any of the foregoing topics."

10 **Q.** Who is Representative Scott Perry, and how would
11 communications with him be relevant?

12 **A.** Representative Scott Perry is a member of the
13 House of Representatives from Pennsylvania. And he
14 reportedly had been involved with efforts to try to persuade
15 the administration to change the leadership of the
16 Department of Justice in the weeks leading up to the
17 January 6th attack.

18 **Q.** Can you explain for us why a change in leadership
19 at the Department of Justice was relevant to the Committee's
20 investigation?

21 **A.** Yes. According to public accounts, the Department
22 of Justice had been under pressure to make claims that there
23 was election fraud. And the Attorney General, Attorney
24 General Barr, had stated in the beginning of December, that
25 there was not widespread fraud sufficient to have changed

1 the results of the election. And his successors were taking
2 the same position.

3 Reportedly there was an effort to change the
4 leadership at the Department of Justice in order to put
5 individuals in charge who would make claims that there was
6 election fraud.

7 **Q.** And finally, item 17, Ms. Amerling, "Any
8 communications with Rudolph Giuliani, John Eastman, Michael
9 Flynn, Jenna Ellis or Sydney Powell about any of the
10 foregoing topics." Can you explain who those individuals
11 were in relation to the events of January 6th?

12 **A.** These were all individuals, private citizens, who
13 had been involved, to different degrees, with efforts to
14 persuade people that the election had been stolen.

15 **Q.** And how would the defendant's communications with
16 these individuals be relevant -- if he had any, be relevant
17 to the Committee's investigation?

18 **A.** The Committee is focused on determining what
19 happened on January 6 and why, and putting together as
20 complete and thorough account of the facts, circumstances
21 and causes of those events.

22 So it's important to understand what the
23 relationships are between the different individuals and
24 entities were who were involved with the events of that day.

25 **Q.** And the subpoena requests documents relating to

1 all of these topics. Can you just describe for the jury
2 what -- specifically what kind of documents the Committee
3 expected or had in mind?

4 **A.** The subpoena called for documents that included
5 paper records, electronic records such as emails, text
6 messages. Those are some of the main examples.

7 **Q.** And you testified earlier that committees and this
8 Committee conducts investigations in order to figure out
9 what kind of legislation or rule changes or regulations need
10 to be amended or added.

11 Can you explain to the jury some of the kinds of
12 measures Congress is authorized to consider that the
13 information the defendant was required to provide related
14 to?

15 **A.** Yes. As I described yesterday, there's a whole
16 range --

17 **MR. CORCORAN:** Objection to stipulation.

18 **THE COURT:** Overruled.

19 You may answer the question.

20 **THE WITNESS:** Yes, sir.

21 Select Committee is investigating facts and
22 circumstances of the attack on the Capitol on January 6th,
23 the interference of a peaceful transfer of power. It's
24 compiling a thorough record of the facts that relate to
25 those events in order to evaluate a whole range of

1 corrective measures that could be put in place to prevent
2 something like that from happening in the future.

3 There are a number of different areas on which
4 Congress could legislate. The Select Committee is not yet
5 at the phase of its investigation where it has specified
6 specific measures. But there are a number of types of
7 examples that individuals who have testified about the
8 events of January 6th have cited. Some of the members of
9 the Committee have given representative examples.

10 Some of those examples include measures to boost
11 funding for agencies that support the defense of the
12 Capitol. Measures that improve communication, intelligence
13 among agencies that help protect against attacks like the
14 one that we saw. Other measures could include modifications
15 to laws and regulations that govern the finalization of
16 presidential votes such as the Electoral Count Act.

17 Other measures that members have cited include
18 potentially providing for increases in criminal penalties
19 for crimes that relate to conduct that occurred on that day.

20 **BY MS. VAUGHN:**

21 **Q.** And all of these categories of documents that
22 we've been talking about, were the topics that we've been
23 talking about also topics that the Committee intended to
24 cover in the deposition that was required by the subpoena?

25 **A.** That's correct.

1 **Q.** You testified that you provided the subpoena to
2 the defendant through his attorney, Robert Costello. Did
3 you personally provide the subpoena that way, or was it
4 someone else on the Committee?

5 **A.** I emailed the subpoena to Mr. Bannon's attorney,
6 Mr. Costello.

7 **Q.** Does the subpoena include a page where you
8 documented providing the subpoena to Mr. Costello?

9 **A.** Yes, it does.

10 **MS. VAUGHN:** Ms. Dunn-Gordon, can we go to Page 2
11 of Government's Exhibit 2, please.

12 **BY MS. VAUGHN:**

13 **Q.** All right. Ms. Amerling, this page is titled
14 "Proof of Service." Is this the page you were just
15 referring to?

16 **A.** Yes.

17 **Q.** And at the top we see a similar, sort of two-line
18 subpoena for Stephen Bannon, but I want to talk about the
19 box at the bottom with the handwritten information there.
20 Did you write this information?

21 **A.** I did.

22 **Q.** And it says "Served by Kristin Amerling." That's
23 you?

24 **A.** That's correct.

25 **Q.** And you also signed this; is that right?

1 **A.** I did.

2 **Q.** And is that what we see next to "Signature of
3 Server?"

4 **A.** That's correct.

5 **Q.** And next to "Manner of Service," did you write
6 that in?

7 **A.** I did.

8 **Q.** What did you write there?

9 **A.** I wrote "email to attorney for Mr. Bannon, Robert
10 Costello" and his email address.

11 **Q.** And the date that's listed, that's September 23rd,
12 the date you provided it?

13 **A.** That's the date I emailed it to him, yes.

14 **Q.** Let's look at your emails with Mr. Costello, the
15 defendant's attorney.

16 **MS. VAUGHN:** Ms. Dunn-Gordon, could we bring up,
17 just for the witness and the Court, Government's Exhibit 3,
18 please?

19 **BY MS. VAUGHN:**

20 **Q.** All right. Ms. Amerling, this is a three-page
21 document. What's contained in this document?

22 **A.** This looks like an email chain between myself and
23 Mr. Costello, Mr. Bannon's attorney.

24 **Q.** What are the dates of these emails?

25 **A.** It starts on September 23rd and it ends on

1 September 24th, 2021.

2 **MS. VAUGHN:** Your Honor, the government moves to
3 admit and publish Government's Exhibit 3.

4 **MR. CORCORAN:** No objection, Your Honor.

5 **THE COURT:** Government's Exhibit 3 is admitted and
6 may be published to the jury.

7 (Government's Exhibit 3 was admitted.)

8 **MS. VAUGHN:** All right. I want to zoom in on the
9 email at the bottom of Page 1 starting with "On September
10 23rd," please, Ms. Dunn-Gordon.

11 **BY MS. VAUGHN:**

12 **Q.** This is the first email in the chain in this
13 document. Who is this email from, Ms. Amerling?

14 **A.** It is from me.

15 **Q.** To who?

16 **A.** To Mr. Costello.

17 **Q.** Do you see the date there, September 23rd, at
18 6:38 p.m.?

19 **A.** Yes, I do.

20 **Q.** In the email you first say, "I am following up on
21 our conversation today in which you confirmed that you
22 represent Stephen Bannon." What is the conversation that
23 you're referring to there?

24 **A.** I had reached out to Mr. Costello because we
25 understood that he was representing Mr. Bannon, and I wanted

1 to confirm that.

2 Q. And can you describe what Mr. Costello told you in
3 that call?

4 A. He confirmed that he was, in fact, representing
5 Mr. Bannon.

6 Q. Did you inform him in that call that the Committee
7 had a subpoena for Mr. Bannon?

8 A. Yes, we discussed the subpoena, and we discussed
9 the fact that I would be sending him a subpoena. I asked if
10 he would accept service of the subpoena on his client's
11 behalf. He said he would check with his client and confirm.

12 Q. And is that what you're referring to in the next
13 line of the email where you say, "I understand that you are
14 checking with Mr. Bannon regarding whether he will authorize
15 you to accept service of the subpoena on his behalf"?

16 A. That's right.

17 Q. And can you please read the rest of your email
18 there?

19 A. It says, "The Select Committee to investigate the
20 January 6th attack on the United States Capitol is today
21 issuing the attached subpoena to Mr. Bannon for his
22 testimony and the production of documents to the Committee.
23 In the event that you will accept service, I am attaching to
24 this email the subpoena, along with a letter from Chairman
25 Bennie Thompson, a document schedule with accompanying

1 production instructions, and a copy of the deposition
2 rules."

3 Q. And is what you attached what we were just looking
4 at in Exhibit 2?

5 A. We were looking at a part of what I attached, yes.

6 Q. Is what you attached all of Exhibit 2? I know we
7 hadn't talked about the other pages yet.

8 A. That's correct.

9 Q. All right. Let's look at the next email in the
10 chain.

11 MS. VAUGHN: Ms. Dunn-Gordon, if you could zoom in
12 on the middle email there.

13 BY MS. VAUGHN:

14 Q. This is an email that was sent the next day on
15 Friday, September 24th, 2021. Who sent this email?

16 A. This email is from Mr. Costello, Mr. Bannon's
17 counsel.

18 Q. Okay. Who is it to?

19 A. To myself.

20 Q. What does Mr. Costello tell you the next day on
21 September 24th?

22 A. He confirmed that he had authority from his client
23 to accept the subpoena.

24 Q. And he says: "This will advise you that I have
25 been authorized by Steve Bannon to accept service."

1 When you got this email from Mr. Costello and he
2 said he had been authorized, what did you understand him to
3 mean by that?

4 **A.** That he had accepted the subpoena that we had
5 issued the day before on Mr. Bannon's behalf.

6 **Q.** And based on what Mr. Costello told you in the
7 phone call and in this email, what was your understanding
8 about whether Mr. Costello was actually in touch with the
9 defendant?

10 **A.** He had represented that he was his attorney, so
11 our understanding was that he was in communication with
12 Mr. Bannon.

13 **Q.** And what would the Committee had done if it had
14 reason to believe that Mr. Costello was not in communication
15 with the defendant?

16 **THE COURT:** Can you ask the question based on her
17 experience?

18 **BY MS. VAUGHN:**

19 **Q.** Based on how the Committee handles these things,
20 in your experience, now that you've worked on it for a year,
21 what would the Committee have done if the Committee believed
22 that Mr. Costello was not in communication with the
23 defendant?

24 **A.** We would have sought to determine whether
25 Mr. Bannon was represented by anyone else. If he was not

1 represented by anybody else, we would have sought to reach
2 out to him directly.

3 Q. All right.

4 Ms. Amerling, we're going to be talking about
5 several dates here.

6 MS. VAUGHN: So, with the Court's permission, I
7 would like to just keep a timeline, if I can, so that we can
8 keep them all straight.

9 THE COURT: I was wondering what the easel was
10 for. Fair enough.

11 MS. VAUGHN: Your Honor, I'm just going to add
12 these two dates.

13 MR. CORCORAN: Your Honor, we can't see the easel.

14 THE COURT: Yes. We definitely need to have the
15 easel visible to everyone.

16 MS. VAUGHN: (Adjusted the easel and created said
17 timeline.)_

18 THE COURT: Thank you.

19 BY MS. VAUGHN:

20 Q. All right. Ms. Amerling, so I put on our timeline
21 that the subpoena was delivered on September 23rd, and
22 Mr. Costello confirmed that he was authorized by the
23 defendant to take it on September 24th. So we've looked at
24 the subpoena and the emails of its delivery.

25 Let's talk about the defendant's compliance. You

1 testified earlier that the subpoena required the defendant
2 to provide documents by 10:00 a.m. on October 7th. Did the
3 defendant provide any records to the Committee by that time?

4 **A.** He did not.

5 **Q.** Between the time that you got that email from
6 Mr. Costello on September 24th confirming that he had been
7 authorized to take it, between that time and 10:00 in the
8 morning on October 7th, did the Committee hear anything more
9 from the defendant about the subpoena at all?

10 **A.** No.

11 **Q.** So, for example, did he ever ask for an extension
12 because he needed more time to find and collect documents?

13 **A.** He did not.

14 **Q.** Did he ever inform the Committee that he did not
15 have responsive documents?

16 **A.** He did not.

17 **Q.** And if the defendant didn't have documents or
18 needed more time, was there a specific process that the
19 defendant was directed to follow if he was unable to comply
20 by the deadline?

21 **A.** Yes. There are instructions that are attached to
22 the subpoena on that issue.

23 **Q.** Let's look at those.

24 **MS. VAUGHN:** Ms. Dunn-Gordon, if we could bring up
25 again Government's Exhibit 2 and go to Page 6.

1 **BY MS. VAUGHN:**

2 **Q.** Ms. Amerling, this document is titled "Document
3 Production Definitions and Instructions." Do you see that?

4 **A.** Yes.

5 **Q.** Was this provided along with the subpoena in that
6 email to Mr. Costello?

7 **A.** Yes, it was.

8 **Q.** All right. Let's go to instruction 13 and zoom in
9 on that. Can you please read instruction 13 there?

10 **A.** Yes. It says, "If compliance with the request
11 cannot be made in full by the specified return date,
12 compliance shall be made, to the extent possible, by that
13 date. An explanation of why full compliance is not possible
14 shall be provided along with any partial production, as well
15 as a date certain as to when full production will be
16 satisfied."

17 **Q.** So this is what the subpoena required if the
18 defendant could not comply by the deadline?

19 **A.** That's correct, yes.

20 **Q.** And did he at all follow this procedure?

21 **A.** He did not.

22 **Q.** Let's look at another item on this list, item 19.
23 Can you please read item 19 to the jury?

24 **A.** It says, "Upon completion of the production,
25 submit a written certification, signed by you or your

1 counsel stating that: (1) a diligent search has been
2 completed of all documents in your possession, custody or
3 control that reasonably could contain responsive documents;
4 and (2) all documents located during the search that are
5 responsive have been produced to the Committee."

6 **Q.** So if the defendant -- in your experience on the
7 Committee, is this what the subpoena requires individuals to
8 do if they've done a search and haven't found certain
9 documents?

10 **A.** That's correct.

11 **Q.** Did the defendant follow this procedure by 10:00
12 in the morning on October 7th?

13 **A.** He did not.

14 **Q.** Did the Committee get anything more than radio
15 silence by 10:00 in the morning on October 7th?

16 **A.** No.

17 **Q.** So despite the deadline passing, did the
18 defendant -- or did the Committee eventually receive a
19 communication from the defendant?

20 **A.** His counsel, after the deadline had passed, sent a
21 letter.

22 **Q.** Did he send that later that day?

23 **A.** I believe that's right.

24 **Q.** How did the Committee receive the letter?

25 **A.** Mr. Costello emailed his correspondence to me.

1 **MS. VAUGHN:** Ms. Dunn-Gordon, if we could bring
2 up, just for the witness, Government's Exhibit 4, please.

3 **BY MS. VAUGHN:**

4 **Q.** Ms. Amerling, Government's Exhibit 4 is a
5 multi-paged document. What's contained in Government's
6 Exhibit 4?

7 **A.** This looks like a copy of the letter that
8 Mr. Costello sent to the Committee on October 7th.

9 **Q.** And is there an additional document within
10 Government's Exhibit 4?

11 **A.** Sorry. What's your question?

12 **Q.** Is there an additional page to Government's
13 Exhibit 4? Could you just describe what that is?

14 **A.** There's a two-page letter and then there is a copy
15 of email correspondence between myself and Mr. Costello.

16 **Q.** And is that email correspondence about the letter?

17 **A.** Yes, it is.

18 **MS. VAUGHN:** Your Honor, the government moves to
19 admit and publish Government's Exhibit 4.

20 **MR. CORCORAN:** No objection, Your Honor.

21 **THE COURT:** Government's Exhibit 4 is admitted and
22 may be published to the jury.

23 (Government's Exhibit 4 was admitted.)

24 **BY MS. VAUGHN:**

25 **Q.** All right. Ms. Amerling, let's actually start on

1 Page 3 of Government's Exhibit 4.

2 **MS. VAUGHN:** And if we could zoom in on the bottom
3 half, the bottom email in this document.

4 **BY MS. VAUGHN:**

5 **Q.** The bottom email there, who is it from and to?

6 **A.** This is from Mr. Costello to myself.

7 **Q.** What is it that Mr. Costello says in the email?

8 **A.** It says, "Dear Ms. Amerling, please find my
9 attached letter response on behalf of Stephen K. Bannon to
10 the House Select Committee Subpoena of September 23, 2021."

11 **Q.** When was this email sent to the Committee?

12 **A.** It was sent at 5:05 p.m. on October 7th, 2021.

13 **Q.** When was that in relation to the document deadline
14 of the subpoena?

15 **A.** It was after the document deadline had passed.

16 **Q.** Returning to Pages 1 and 2 of Exhibit 4, is this
17 what was attached to that email we were just looking at?

18 **A.** Yes, that's my recollection of what was attached.

19 **MS. VAUGHN:** All right. Let's start on Page 1, if
20 we could, Ms. Dunn-Gordon.

21 **BY MS. VAUGHN:**

22 **Q.** All right. So this is a letter from the
23 defendant's attorney to you; is that right?

24 **A.** That's correct.

25 **Q.** All right. Let's look at the body of the letter.

1 **MS. VAUGHN:** So let's zoom in, Ms. Dunn-Gordon, on
2 the content of the letter there on the second half of the
3 page.

4 **BY MS. VAUGHN:**

5 **Q.** All right. And it begins with, "I write today on
6 behalf of Stephen K. Bannon with respect to the
7 above-referenced subpoena, which I accepted on behalf of
8 Mr. Bannon."

9 When he said he was writing on behalf of the
10 defendant, what did you understand Mr. Costello to mean by
11 that?

12 **A.** I understood that he was representing Mr. Bannon
13 and that he had communicated with Mr. Bannon about the
14 matter that he was writing about.

15 **Q.** What is the next thing that the letter states in
16 the next sentence?

17 **A.** It says, "On the afternoon of October 6th, 2021, I
18 received a letter from Justin Clark, as counsel for then
19 President of the United States Donald J. Trump. That letter
20 references the subpoena that your Committee served upon
21 Mr. Bannon, and notes that the subpoena" -- quotes from the
22 subpoena. Would you like me to continue reading?

23 **Q.** Yeah. So is the next part of the letter
24 purporting to provide an excerpt of what the defendant
25 received?

1 **A.** It purports to quote from the letter from
2 Mr. Clark, yes.

3 **Q.** Can you please read the first paragraph of that
4 excerpt?

5 **A.** It says, "Seeks records and testimony purportedly
6 relating to the events of January 6th, 2021, including but
7 not limited to information which is potentially protected
8 from disclosure by executive and other privileges, including
9 among others the presidential communications, deliberative
10 process, and attorney-client privileges. President Trump is
11 prepared to defend these fundamental privileges in court."

12 **Q.** All right. So we saw a few references to
13 "privilege" there. Can you just explain to the jury, when
14 it comes to a congressional subpoena, what a privilege means
15 for compliance with a congressional subpoena?

16 **A.** A privilege is a claim that can be made that
17 certain types of communications are confidential or
18 sensitive and deserve protection from production.

19 **THE COURT:** Ms. Vaughn, hold on a second.

20 **MR. CORCORAN:** I just want to object subject to
21 the briefing and discussion we've had before.

22 **THE COURT:** Sure. Your objection is preserved.

23 **BY MS. VAUGHN:**

24 **Q.** All right. And after the excerpt from this letter
25 that purports to be from the former President, does the

1 letter continue at the bottom of the page and on to the
2 next?

3 **A.** It does.

4 **Q.** All right.

5 **MS. VAUGHN:** Ms. Dunn-Gordon, are we able to bring
6 up the two pages side by side? If we can zoom in on that
7 last paragraph that goes on to the next page.

8 **BY MS. VAUGHN:**

9 **Q.** All right. Ms. Amerling, can you please read this
10 paragraph of Mr. Costello's letter to the jury.

11 **A.** It says, "It is therefore clear to us that since
12 the executive privileges belong to President Trump, and he
13 has, through his counsel, announced his intention to assert
14 those executive privileges enumerated above, we must accept
15 his direction and honor his invocation of executive
16 privilege. As such, until these issues are resolved, we are
17 unable to respond to your request for documents and
18 testimony."

19 **Q.** So it says there that the defendant is not going
20 to comply with the request for documents or testimony.

21 Based on this letter, what was the understanding
22 about the basis for his noncompliance?

23 **A.** My understanding was that he was asserting
24 executive privileges somehow related to our request for
25 information from him.

1 **Q.** Were you involved in the Committee's consideration
2 of this letter and what it meant for the subpoena the
3 Committee had issued?

4 **A.** I was.

5 **Q.** And after receiving this letter, what was the
6 Committee's position with respect to whether the defendant
7 still had to comply with the subpoena?

8 **A.** The Select Committee's position was, this was not
9 a valid rationale for refusing to comply.

10 **Q.** And just to clarify, this subpoena was a
11 congressional subpoena; is that right?

12 **A.** That's correct.

13 **Q.** And that is just one part of the government?

14 **A.** Yes. Congressional subpoenas are issued by the
15 legislative branch.

16 **Q.** So did any other part of the government have any
17 role in putting together, authorizing or supervising the
18 subpoena?

19 **A.** No.

20 **Q.** All right. You testified that the Committee
21 concluded it was not a valid basis. So did the Committee --
22 was its position that it was accepting or rejecting the
23 defendant's claim that he had an excuse not to comply with
24 the subpoena?

25 **A.** The Chairman issued a letter to Mr. Bannon

1 explaining that the Committee rejected the basis that he had
2 offered for refusing to comply.

3 Q. And in your role, were you involved in advising on
4 the content of and putting that letter together and sending
5 it to the defendant?

6 A. I was.

7 Q. And how did you send that letter to the defendant?

8 A. I emailed the Chairman's letter to Mr. Bannon's
9 counsel, Mr. Costello.

10 Q. All right. Let's take a look at the letter you
11 sent back.

12 MS. VAUGHN: If we could bring it up just for the
13 witness, Government's Exhibit 5.

14 BY MS. VAUGHN:

15 Q. Ms. Amerling, what is Government's Exhibit 5?

16 A. It is an October 8th letter from Chairman Bennie
17 Thompson to Mr. Costello.

18 Q. And this is the letter that you emailed?

19 A. That's correct.

20 MS. VAUGHN: Your Honor, the government moves to
21 admit and publish Government's Exhibit 5 to the jury.

22 MR. CORCORAN: Your Honor, with each of these, I
23 won't restate everything that's been briefed on this. Thank
24 you.

25 THE COURT: Yes.

1 So this exhibit is admitted, but as with prior
2 exhibits, it is admitted for the purpose of demonstrating
3 that the Committee took the positions in this letter and
4 communicated those positions to Mr. Bannon. It is not
5 admitted for the truth of any underlying statement in the
6 letter.

7 And the letter may be published to the jury.

8 **MS. VAUGHN:** Thank you, Your Honor.

9 **BY MS. VAUGHN:**

10 **Q.** Ms. Amerling, first, what is the date of this
11 letter?

12 **A.** October 8th, 2021.

13 **Q.** And is that the same day that you sent it to the
14 defendant's attorney?

15 **A.** Yes, it is.

16 **Q.** All right. So this is actually a three-page
17 letter, but I only want to talk about just a few things
18 within it.

19 So first, who is the letter from?

20 **A.** The letter is from the Chairman of the Select
21 Committee, Chairman Bennie Thompson.

22 **Q.** And based on your involvement in this letter, was
23 it sent on his personal behalf or on behalf of the
24 Committee?

25 **A.** It was sent on behalf of the Select Committee.

1 **Q.** And, generally, what does this letter tell the
2 defendant about his obligation to comply with the subpoena?

3 **A.** It reminds him that he is obligated to comply with
4 the terms of the subpoena and that the Select Committee will
5 view his failure to comply as willful noncompliance with the
6 criminal contempt statute; and that he also might be subject
7 to other civil penalties.

8 **Q.** And does this letter also inform the defendant
9 that the Committee was rejecting his reason for not
10 complying?

11 **A.** Yes, it did.

12 **MS. VAUGHN:** So let's zoom in on the first
13 paragraph there, please, Ms. Dunn-Gordon.

14 **BY MS. VAUGHN:**

15 **Q.** All right. Ms. Amerling, the letter first notes
16 that Chairman Thompson's writing in response to the
17 October 7th letter that Mr. Costello had sent. Can you
18 please read the part of this paragraph that starts with
19 "Your letter relies"?

20 **A.** Yes. It says, "Your letter relies on an apparent
21 instruction from former President Donald Trump that appears
22 limited to requesting that Mr. Bannon not disclose
23 privileged information. Despite this limited instruction,
24 your letter takes the inappropriate position that Mr. Bannon
25 will not comply with any request for information or

1 testimony sought by the Select Committee.

2 "Moreover, Mr. Trump's stated intention to assert
3 those executive privileges that may or may not belong to him
4 does not provide a legal basis for Mr. Bannon's refusal to
5 comply with the Subpoena."

6 **MS. VAUGHN:** All right. And, Ms. Dunn-Gordon, can
7 we please zoom in on the last full paragraph on this page
8 that starts with "Your letter"?

9 **BY MS. VAUGHN:**

10 **Q.** All right. Ms. Amerling, can you please read this
11 paragraph?

12 **A.** It says, "Your letter indicates that the sole
13 basis for defiance of the Subpoena is Mr. Trump's direction
14 to your client and his decision to honor [Mr. Trump's]
15 invocation of executive privilege. That position has no
16 basis in law, and your letter does not cite any statute,
17 case law or other legal precedent for support."

18 **Q.** Okay. So we've read a couple parts of this letter
19 informing the defendant that the Committee has rejected his
20 reason for not complying. Did the letter also tell the
21 defendant he still had to comply?

22 **A.** Yes, it did.

23 **Q.** All right.

24 **MS. VAUGHN:** Ms. Dunn-Gordon, can we please go to
25 Page 2, and zoom in on the last paragraph of Page 2 of this

1 letter.

2 **BY MS. VAUGHN:**

3 Q. Ms. Amerling, can you please read just the first
4 two sentences of the last paragraph?

5 A. It says, "Regardless of any purported privilege
6 assertion by Mr. Trump, Mr. Bannon has an ongoing obligation
7 to produce documents to the Select Committee. Accordingly,
8 please produce all responsive documents and records
9 identified in the Subpoena."

10 Q. Did the letter also tell the defendant that he was
11 not excused from appearing at his deposition on October 14th
12 as required by the subpoena?

13 A. Yes, it does so in the paragraph that follows.

14 MS. VAUGHN: Ms. Dunn-Gordon, can we please go to
15 the last page of this exhibit and zoom in on the top
16 paragraph there.

17 **BY MS. VAUGHN:**

18 Q. Ms. Amerling, can you please read the first
19 sentence there.

20 A. It says, "Finally, the Select Committee expects
21 Mr. Bannon's appearance at the time and place designated in
22 the Subpoena for a deposition and to respond fully to
23 questions by the Select Committee."

24 Q. And remind us again what the date and time was
25 that the subpoena required him to appear?

1 **A.** Ten o'clock a.m. on October 14th, 2021.

2 **Q.** So when was this letter sent in relation to that
3 date?

4 **A.** It was sent six days before his deposition date.

5 **Q.** And, finally, did the letter warn the defendant
6 about what might happen if he failed to comply with the
7 subpoena?

8 **A.** Yes, it did, in the last paragraph.

9 **MS. VAUGHN:** Ms. Dunn-Gordon, can you please zoom
10 in on that?

11 **BY MS. VAUGHN:**

12 **Q.** All right. First, can you please read just the
13 first sentence of this paragraph, Ms. Amerling?

14 **A.** It says, "Please be advised that the Select
15 Committee will view Mr. Bannon's failure to respond to the
16 Subpoena as willful noncompliance with the Subpoena."

17 **Q.** What is it the Committee is referring to there
18 when it tells the defendant it will view his noncompliance
19 as willful noncompliance?

20 **A.** It's referring to the criminal contempt statute.

21 **Q.** Can you finish reading that paragraph, please?

22 **A.** It says, "His willful noncompliance with the
23 Subpoena would force the Select Committee to consider
24 invoking the contempt of Congress procedures in 2 U.S.C.
25 Sections 192 and 194, which could result in a referral from

1 the House to the Department of Justice for criminal charges,
2 as well as the possibility of having a civil action to
3 enforce the Subpoena brought against Mr. Bannon in his
4 personal capacity."

5 Q. This reference to U.S.C., is that a reference to
6 the United States Code?

7 A. That's correct.

8 Q. Those are just the country's laws?

9 A. That's right. And the specific provisions refer
10 to the criminal contempt statute.

11 Q. What was the purpose of including this warning in
12 the letter that the Committee sent to the defendant?

13 A. Establishing a clear record of the Committee's
14 views, making sure that the defendant was aware of that.

15 Q. All right. So we've just talked about a couple
16 more dates. I'm going to add those to our timeline.

17 **MS. VAUGHN:** (Added information to timeline.)

18 **BY MS. VAUGHN:**

19 Q. All right, Ms. Amerling. So we've talked about
20 the document deadline, the defendant's letter at 5 p.m. that
21 day refusing and then the Committee's response to that.
22 Once the Committee sent --

23 **THE COURT:** Ms. Vaughn, if you're going to move
24 on, could we take a break?

25 **MS. VAUGHN:** Now's a great time, Your Honor.

1 **THE COURT:** I figured it would be. Let's do 15
2 minutes. Let's attempt to do as close as possible to 15
3 minutes.

4 Let's call it 10:55. I realize some of these
5 clocks aren't quite right. According to my computer, it's
6 10:38. So 17 minutes; 10:55.

7 (Recess taken from 10:39 a.m. to 11:00 a.m.)

8 **THE COURT:** Ms. Lesley, you may bring the jury in.
9 (Jurors enter the courtroom.)

10 **DEPUTY CLERK:** Your Honor, we are now back on the
11 record.

12 **THE COURT:** Thank you, Ms. Lesley. Ms. Vaughn.

13 **MS. VAUGHN:** Thank you, Your Honor.

14 **BY MS. VAUGHN:**

15 **Q.** Ms. Amerling, before we took a break, we had just
16 finished looking at a letter that the Committee sent to the
17 defendant on October 8th. We saw in that letter the
18 Committee's direction that the defendant needed to comply
19 with the subpoena. After sending that letter, did the
20 defendant begin providing documents to the Committee?

21 **A.** He did not.

22 **Q.** Did the defendant, after you sent that letter,
23 indicate to the Committee in any way that he was planning to
24 begin collecting and providing documents?

25 **A.** He did not.

1 **Q.** And the date for the deposition required by the
2 subpoena was October 14th. Did the defendant come to the
3 deposition as required on that date?

4 **A.** He did not.

5 **Q.** Between the date that the Committee sent the
6 October 8th letter and the deposition date on October 14th,
7 did the Committee receive another communication from the
8 defendant?

9 **A.** Yes.

10 **Q.** What did the Committee get by way of that?

11 **A.** The Committee received a letter dated October 13th
12 from Mr. Bannon's counsel.

13 **MS. VAUGHN:** Can we bring up for the witness
14 Government's Exhibit 6, please?

15 **BY MS. VAUGHN:**

16 **Q.** Ms. Amerling, what is Government's Exhibit 6?

17 **A.** This is the October 13th, 2021 letter that I was
18 referring to.

19 **Q.** How did the Committee receive this letter?

20 **A.** This was again emailed to me from Mr. Costello.

21 **Q.** Was it emailed also on October 13th?

22 **A.** I believe that's right.

23 **MS. VAUGHN:** Your Honor, the government moves to
24 admit and publish Government's Exhibit 13 [sic].

25 **MR. CORCORAN:** Our position remains as our

1 briefing stated. Thank you.

2 **THE COURT:** I did not think that you had objected
3 to this document at all.

4 **MR. CORCORAN:** We don't object, Your Honor.

5 **THE COURT:** This document is admitted and may be
6 published to the jury.

7 (Government's Exhibit 6 was admitted.)

8 **MR. CORCORAN:** Your Honor, I just want to make
9 sure that the record reflects this is Government's Exhibit
10 6.

11 **THE COURT:** Correct. Government Exhibit 6.

12 I apologize if I said something different than
13 that. Government Exhibit 6 is admitted and may be published
14 to the jury.

15 **MS. VAUGHN:** Thank you, Your Honor.

16 **BY MS. VAUGHN:**

17 **Q.** So you testified that this letter was dated
18 October 13th, the day before the deposition date. And as
19 with the defendant's earlier letter on October 8th -- or
20 sorry -- October 7th, were you also involved in considering
21 and responding to this letter?

22 **A.** I was.

23 **Q.** All right. And in this letter, what is it that
24 the defendant told the Committee about whether he was going
25 to comply with the subpoena?

1 **A.** In this letter he told the Committee that
2 Mr. Bannon was going to provide neither documents nor
3 testimony.

4 **MS. VAUGHN:** All right. And if we could go to
5 Page 2 of Government's Exhibit 6, please, and zoom in on the
6 first full paragraph there.

7 **BY MS. VAUGHN:**

8 **Q.** Ms. Amerling, can you please read the first or the
9 zoomed-in paragraph there, the first full paragraph on Page
10 2?

11 **A.** It says, "Until such time as you reach an
12 agreement with President Trump or receive a court ruling as
13 to the extent, scope and application of the executive
14 privilege, in order to preserve the claim of executive and
15 other privileges, Mr. Bannon will not be producing documents
16 or testifying. As noted previously, Mr. Bannon will revisit
17 his position if President Trump's position changes or if a
18 court rules on this matter."

19 **Q.** And to be clear, by this time, had the Committee
20 already sent a letter to the defendant notifying him that
21 the privilege he was asserting did not excuse him?

22 **A.** That's correct.

23 **Q.** Did former President Trump, at this time, sit on
24 the Committee or in Congress in any way?

25 **A.** He did not.

1 **Q.** And are courts part of the Committee or Congress
2 in any way?

3 **A.** They are not.

4 **Q.** In this letter, did the defendant raise any other
5 reason, to the Committee's knowledge, for not complying,
6 other than the same privilege he had been claiming?

7 **A.** He did not.

8 **Q.** Okay. So the Committee gets this letter and the
9 next day was October 14th. Did the defendant show up for
10 his deposition?

11 **A.** He did not.

12 **Q.** So let's add these two dates to our timeline.

13 **MS. VAUGHN:** (Added information to timeline.)

14 **BY MS. VAUGHN:**

15 **Q.** All right. So by October 14th, the defendant has
16 not produced documents or appeared for testimony. What did
17 the Committee do next with respect to the defendant?

18 **A.** The Committee sent him a letter through his
19 counsel on October 15th.

20 **Q.** And what was the purpose of sending the defendant
21 another letter?

22 **A.** The purpose was to reiterate that the Committee
23 believed that he was in noncompliance with the subpoena and
24 notified him that the Committee would be meeting on October
25 19th to consider a criminal referral resolution.

1 **Q.** All right. And let's talk a little bit more about
2 that specifically in a minute. But were you involved in
3 putting that additional letter together and getting it over
4 to the defendant?

5 **A.** I was.

6 **Q.** And did you personally provide it like you had the
7 other ones?

8 **A.** I emailed it, like I had with the previous
9 letters, yes.

10 **MS. VAUGHN:** All right. If we could bring up for
11 the witness Government's Exhibit 7.

12 **BY MS. VAUGHN:**

13 **Q.** Ms. Amerling, is this the letter you were just
14 referring to that the Committee sent to the defendant on
15 October 15th?

16 **A.** Yes, it is.

17 **MS. VAUGHN:** Your Honor, the government moves to
18 admit and publish Government's Exhibit 7.

19 **MR. CORCORAN:** Same position, Your Honor.

20 **THE COURT:** Thank you, Mr. Corcoran.

21 Government's Exhibit 7 is admitted, with the same
22 limiting instruction that I've used previously, which is
23 that this letter is admitted for the purpose of
24 demonstrating that the Committee took this position in its
25 communication to Mr. Bannon, or to Mr. Costello and

1 Mr. Bannon, but not for the truth. It's not admitted for
2 the truth of anything asserted in the letter, especially
3 anything underlying the arguments in the letter. But it is
4 otherwise admitted. Again, this is Government's Exhibit 7,
5 and it may be published to the jury.

6 (Government's Exhibit 7 was admitted.)

7 **MS. VAUGHN:** Thank you, Your Honor.

8 **BY MS. VAUGHN:**

9 **Q.** Ms. Amerling, who is this letter from?

10 **A.** The letter is from the Chairman of the Committee,
11 Chairman Bennie Thompson.

12 **Q.** Like the other letter we saw, is this sent on
13 behalf of Chairman Thompson personally or on behalf of the
14 Committee?

15 **A.** It is sent on behalf of the Committee.

16 **Q.** Again, by October 15th, had the deadlines on the
17 subpoena passed?

18 **A.** Yes, both the October 7th deadline for producing
19 documents and the October 14th deadline for appearing for
20 deposition had passed.

21 **MS. VAUGHN:** All right. Let's zoom in, if we
22 could, on the first paragraph of this letter.

23 **BY MS. VAUGHN:**

24 **Q.** Ms. Amerling, this is a long paragraph. Could you
25 just read the sentence that starts with "as you know"?

1 **A.** It says, "As you know, the Subpoena demanded that
2 Mr. Bannon produce documents by October 7, 2021 and appear
3 on October 14, 2021 before the Select Committee to provide
4 deposition testimony on a wide range of issues relating to
5 the January 6, 2021 attack on the United States Capitol, as
6 well as plans to interfere with the count of the 2020
7 Electoral College results."

8 **Q.** The reference there to "the count of the 2020
9 Electoral College results", is that just another way to
10 reference what we've been talking about, the certification
11 of the election that was happening that day in Congress?

12 **A.** That's correct.

13 **Q.** Can you now, please, read the rest of that
14 paragraph?

15 **A.** It says, "Mr. Bannon has now willfully failed to
16 both produce a single document and to appear for his
17 scheduled deposition. The Select Committee believes that
18 this willful refusal to comply with the 'Subpoena'
19 constitutes a violation of federal law."

20 **Q.** And the Committee views the defendant's refusal to
21 be a violation of federal law. What is it that the
22 Committee was referring to there?

23 **A.** The Committee is referring to the criminal
24 contempt of Congress statute.

25 **Q.** And is that the same statute and procedures that

1 were referenced in the October 8th letter that we looked at?

2 **A.** That's correct.

3 **MS. VAUGHN:** Ms. Dunn-Gordon, can you please zoom
4 in on the next paragraph?

5 **BY MS. VAUGHN:**

6 **Q.** Ms. Amerling, can you please read the second
7 paragraph of the letter for us.

8 **A.** It says, "As justification for Mr. Bannon's
9 complete failure to comply with any portion of the Subpoena,
10 you continue to rely on ex-President Trump's stated
11 intention to invoke executive privilege with respect to
12 Mr. Bannon, and Mr. Trump's purported request that
13 Mr. Bannon not produce documents to or testify before the
14 Select Committee.

15 "As was explained in the Select Committee's
16 October 8, 2021 letter (attached), the former President has
17 not communicated any such assertion of privilege, whether
18 formally or informally, to the Select Committee.

19 "Moreover, we believe that any such assertion of
20 privilege, should it be made by the former President, will
21 not prevent the Select Committee from lawfully obtaining the
22 information that it seeks."

23 **MS. VAUGHN:** Okay. I want to look at another part
24 of the letter. If we could go to Page 2 of Government's
25 Exhibit 7, please. Can you please zoom in on the last full

1 paragraph of Page 2.

2 **BY MS. VAUGHN:**

3 Q. Ms. Amerling, the paragraph starts by saying,
4 "Accordingly, the Select Committee views Mr. Bannon's
5 failure to produce documents by the October 7th deadline as
6 willful noncompliance with the Subpoena."

7 Is that just a reference to what we had discussed
8 earlier, that he had not complied as required?

9 A. That's correct.

10 Q. Can you please read the rest of that paragraph.

11 A. It says, "Mr. Bannon has persisted in his refusal
12 to produce any documents to the Select Committee, and he has
13 failed to provide a privilege log identifying specific
14 asserted privileges. Mr. Bannon has now further compounded
15 his noncompliance by refusing to appear on October 14th,
16 2021, at the Select Committee deposition, to which he was
17 summoned to provide testimony. The Select Committee will
18 therefore be meeting on Tuesday, October 19th, 2021 to
19 consider invoking the contempt of Congress procedures set
20 forth in 2 United States Code, Sections 192 and 194."

21 Q. Ms. Amerling, that reference to the laws there and
22 the procedures, is that, again, just a reference to what we
23 were talking about a minute ago, the criminal contempt
24 procedures?

25 A. That's correct.

1 **Q.** And what does it mean when it says the Committee
2 will consider invoking the procedures?

3 **A.** Under that statute, Congress can vote to approve a
4 resolution that refers criminal contempt to the United
5 States Attorney for prosecution.

6 **MS. VAUGHN:** All right. Ms. Dunn-Gordon, can we
7 bring up, side by side, this and the next page and then zoom
8 in on the last paragraph that spans the pages.

9 **BY MS. VAUGHN:**

10 **Q.** Ms. Amerling, can you please read the last
11 paragraph of this letter for us there.

12 **A.** It says, "If Mr. Bannon believes that there are
13 any additional issues relating to his noncompliance with the
14 Subpoena that have not been addressed, please submit them in
15 writing to the Select Committee by 6:00 p.m. EST on Monday,
16 October 18th, 2021 for the Select Committee's consideration
17 in its deliberations."

18 **Q.** Can you explain for the jury what it's referring
19 to there when it's asking for information relating to any
20 additional issues relating to the defendant's noncompliance?

21 **A.** Yes. The Select Committee had just informed
22 Mr. Bannon again that it considered that his misconduct
23 constituted a violation of federal criminal law. It was
24 telling Mr. Bannon that the Committee was going to meet to
25 vote a resolution about that violation.

1 That's a serious step, referring somebody for
2 criminal prosecution. So this paragraph refers to the
3 Committee's effort to ensure that Mr. Bannon had the
4 opportunity to provide any information that the Select
5 Committee should consider relating to his misconduct before
6 it had its proceeding on October 19th.

7 **Q.** But can you just explain what the kinds of
8 information were that the Committee was referring to there?
9 If it existed.

10 **A.** Information that might shed a light on his
11 misconduct, such as he was confused about instructions he
12 had been given in the subpoena.

13 **Q.** And this letter was sent on October 15th. So how
14 long did the defendant have to provide information like
15 that, whether he was confused or had another issue relating
16 to his failure to comply?

17 **A.** That was three days after the date of the letter.
18 Three days.

19 **Q.** And by 6 p.m. on October 15th, did the defendant
20 provide any additional explanation for why he had failed to
21 comply with the subpoena?

22 **A.** We received a letter -- I need to refresh my
23 recollection of the exact timing.

24 **Q.** Well, why don't we just go take a look at the
25 letter right now.

1 **MS. VAUGHN:** If we could bring up, just for the
2 witness, Government's Exhibit 8. And if we could show the
3 witness both pages, please.

4 **BY MS. VAUGHN:**

5 **Q.** Ms. Amerling, what is Government's Exhibit 8?

6 **A.** This is an October 18th letter that Mr. Costello
7 sent to the Select Committee.

8 **Q.** Is there also an email contained in this exhibit?

9 **A.** Yes. There's an email from Mr. Costello to
10 myself.

11 **Q.** And how are those two things related, the email
12 and the letter?

13 **A.** This is the email that he sent attaching the
14 letter that's in this exhibit.

15 **MS. VAUGHN:** Your Honor, the government moves to
16 admit and publish Government's Exhibit 8.

17 **MR. CORCORAN:** No objection, Your Honor.

18 **THE COURT:** Government's Exhibit 8 is admitted and
19 may be published to the jury.

20 (Government's Exhibit 8 was admitted.)

21 **BY MS. VAUGHN:**

22 **Q.** All right. Ms. Amerling, let's start on Page 1.

23 **MS. VAUGHN:** Ms. Dunn-Gordon, if you could just
24 zoom in on the top of the page.

25

1 **BY MS. VAUGHN:**

2 **Q.** You testified that this was an email with the
3 letter from Mr. Costello to you. When was this letter sent
4 to you?

5 **A.** 6:02 p.m. on Monday, October 18th, 2021.

6 **Q.** All right. And let's take a look at the letter
7 itself.

8 **MS. VAUGHN:** If we could zoom in on the body of
9 the letter.

10 **BY MS. VAUGHN:**

11 **Q.** Ms. Amerling, can you please read this letter for
12 us.

13 **A.** It says, "Dear Congressman Thompson, we write on
14 behalf of Stephen Bannon. We have just been advised of the
15 filing of a lawsuit in federal court for the District of
16 Columbia entitled Donald J. Trump versus Bennie Thompson, et
17 al. In light of this late filing, we respectfully request a
18 one-week adjournment of our response to your latest letter
19 so that we might thoughtfully assess the impact of its on
20 this pending litigation."

21 **Q.** So by 6 p.m. on October 18th, had the defendant
22 provided to the Committee any additional reason, like
23 confusion, for his noncompliance?

24 **A.** No.

25 **Q.** And did the Committee -- what was the Committee's

1 understanding about what the defendant wanted to be delayed
2 by this letter?

3 **A.** The understanding was that the defendant was
4 seeking a delay in responding to the invitation to provide
5 information relating to his misconduct.

6 **Q.** Did the defendant ever ask, by 6 p.m. on
7 October 18th, that the deadlines in the subpoena be
8 extended?

9 **A.** He did not.

10 **Q.** By 6 p.m. on October 18th, did the defendant
11 provide any documents to the Committee?

12 **A.** He did not.

13 **Q.** By 6 p.m. on October 18th, had the defendant
14 provided any indication that he was working to collect
15 documents and provide them?

16 **A.** He had provided no such indication.

17 **Q.** By 6 p.m. on October 18th, had the defendant
18 notified the Committee in any way that he was now willing to
19 come to a deposition?

20 **A.** No.

21 **Q.** Did the Committee agree to delay its consideration
22 of invoking the criminal contempt procedures based on this
23 letter?

24 **A.** It did not.

25 **Q.** Why not?

1 **A.** Because it considered reference to a lawsuit
2 immaterial to the deliberations over his contempt.

3 **Q.** Did the Committee inform the defendant of this
4 position?

5 **A.** Yes.

6 **MS. VAUGHN:** If we could bring up, just for the
7 witness, Government's Exhibit 9.

8 **BY MS. VAUGHN:**

9 **Q.** Actually, Ms. Amerling, before I ask you about
10 this, you just testified that the Committee informed the
11 defendant that he was not going to have any additional time
12 before the Committee considered those procedures. Did the
13 Committee ultimately decide to refer the defendant for
14 criminal contempt?

15 **A.** Yes.

16 **Q.** Did the Committee also inform the defendant of
17 that decision?

18 **A.** Yes.

19 **Q.** Okay. And Government's Exhibit 9 is a multi-page
20 document with two letters. What is contained in
21 Government's Exhibit 9?

22 **MS. VAUGHN:** And if -- Ms. Dunn-Gordon, if we
23 could just bring up the first page of the second letter as
24 well for the witness.

25

1 **BY MS. VAUGHN:**

2 **Q.** All right. Ms. Amerling, what are the two letters
3 contained in Government's Exhibit 9?

4 **A.** These are the two letters sent by the Select
5 Committee to Mr. Bannon via his attorney on October 19th,
6 2021.

7 **MS. VAUGHN:** Your Honor, the government moves to
8 admit and publish Government's Exhibit 9.

9 **MR. CORCORAN:** Our position remains unchanged from
10 the brief, Your Honor.

11 **THE COURT:** Thank you, Mr. Corcoran.

12 Exhibit 9 is admitted, ladies and gentlemen of the
13 jury, for the same purposes as I've described before, which
14 is, it is admitted for the purpose of demonstrating the
15 position that the Committee was taking in these letters to
16 Mr. Bannon.

17 It is not admitted -- or these letters are not
18 admitted -- this exhibit is not admitted for the purpose of
19 demonstrating the truth of any assertion in the letter or
20 letters.

21 Exhibit 9 is admitted with that limiting
22 instruction and may be published to the jury.

23 **MS. VAUGHN:** Thank you, Your Honor.

24 And, Ms. Dunn-Gordon, we can leave those pages up
25 for now.

1 **BY MS. VAUGHN:**

2 **Q.** Ms. Amerling, so both of these letters were sent
3 from the Committee on October 19th. Can you just explain
4 why there are two letters on the same day?

5 **A.** Yes. One was sent prior to the meeting of the
6 Committee to consider the criminal contempt resolution. One
7 was sent after to notify Mr. Bannon that the Committee had
8 taken that step.

9 **Q.** And which one was sent first? The one on the left
10 or the one on the right?

11 **A.** The one on the left was sent first.

12 **Q.** Okay. Let's talk about this one. So this letter
13 on the left, what was the purpose of that letter?

14 **A.** This was to respond to Mr. Bannon's letter from
15 the previous day, October 18th.

16 **Q.** Requesting more time to explain what had happened?

17 **A.** Correct.

18 **Q.** All right.

19 **MS. VAUGHN:** All right. If we could please zoom
20 in on the body of that letter, Ms. Dunn-Gordon.

21 **BY MS. VAUGHN:**

22 **Q.** All right. And, Ms. Amerling, could you just read
23 the last part, beginning with "The investigation."

24 **A.** It says, "The investigation of the Select
25 Committee is extremely important and urgent for the nation,

1 and further delay in compliance by Mr. Bannon undermines the
2 ability of the Committee to timely complete its essential
3 responsibilities.

4 "Accordingly, no grounds exist for any adjournment
5 or other delay, and your request is denied."

6 **Q.** Again, what was the only reason that the Committee
7 understood the defendant to be asking for more time to
8 explain himself?

9 **A.** Filing of a lawsuit that related to executive
10 privilege.

11 **Q.** And executive privilege, was that the same issue
12 that the Committee had already informed the defendant that
13 it had rejected?

14 **A.** That's correct.

15 **Q.** All right. Let's take a look at the second
16 letter.

17 **MS. VAUGHN:** Ms. Dunn-Gordon, if we could just
18 zoom in on the first two paragraphs there.

19 **BY MS. VAUGHN:**

20 **Q.** Ms. Amerling, I think you said you sent this
21 letter after the Committee had decided to refer the
22 defendant for criminal contempt. Can you please read the
23 beginning of the second paragraph there?

24 **A.** It says, "As explained in our prior
25 correspondence, your stated reasons for Mr. Bannon's flat

1 refusal to provide documents and appear at a deposition have
2 no legal basis or support. Because of Mr. Bannon's
3 continued refusal to comply with the subpoena, the Select
4 Committee has unanimously voted to recommend that the House
5 of Representatives find Mr. Bannon to be in contempt of
6 Congress. The detailed basis for that recommendation is
7 contained in the Select Committee's report; a copy of which
8 is available at the following link:"

9 **Q.** What was the purpose of informing the defendant
10 that the Committee had taken this step and providing him
11 with a link to the Committee's findings?

12 **A.** It was a very serious step to refer Mr. Bannon for
13 criminal contempt. We wanted to make sure that he had that
14 information.

15 **Q.** And you sent this letter on October 19th. At that
16 time after you sent it, did you hear anything from the
17 defendant that he -- any further explanation from the
18 defendant, other than executive privilege, about why he had
19 not complied with the subpoena?

20 **A.** We didn't hear anything from him.

21 **MS. VAUGHN:** Nothing further, Your Honor.

22 **THE COURT:** Thank you, Ms. Vaughn.

23 Mr. Corcoran?

24 **MR. CORCORAN:** Thank you, Your Honor.

25 **CROSS-EXAMINATION OF KRISTIN AMERLING**

1 **BY MR. CORCORAN:**

2 **Q.** Ms. Amerling, yesterday you testified about the
3 subject matter of the Select Committee's inquiry. Do you
4 understand that, in this case, there is no allegation that
5 Steve Bannon was involved in the attack on the U.S. Capitol?
6 Do you understand that?

7 **A.** No allegation by whom, sir?

8 **Q.** In the case that's here before the jury, there is
9 no allegation that Steve Bannon was involved on the U.S.
10 Capitol. Do you understand that?

11 **A.** Yes.

12 **Q.** Do you understand that this case involves a
13 subpoena and then actions that were taken with regard to
14 that subpoena?

15 **A.** Yes, sir.

16 **Q.** Okay. Now, when you started your testimony
17 yesterday, you said that there were similarities between you
18 testifying here in court today and the deposition in front
19 of the Select Committee. Do you remember that --

20 **A.** I do.

21 **Q.** -- testimony.

22 But there's a significant difference, isn't there,
23 in the sense that, at the Select Committee deposition, there
24 is no judge present to protect the privileges or rights of a
25 witness, is there?

1 **A.** There is a procedure for asserting privileges in a
2 deposition.

3 **Q.** I understand that there is a procedure. My
4 question is, Is there a judge present at a Select Committee
5 deposition to protect the rights and the privileges of a
6 witness?

7 **A.** Sir, judges are not part of Congress.

8 **Q.** Is that a no?

9 **A.** That's correct, yes.

10 **Q.** Okay.

11 Now, as I understand it, you had some
12 responsibilities with regard to the subpoena, Government's
13 Exhibit Number 2. You were the staff person for the Select
14 Committee who was primarily responsible for this subpoena?

15 **A.** I was one of several staff involved with the
16 drafting and review of the subpoena.

17 **Q.** Okay. And in terms of -- how many witnesses to
18 date have been interviewed by the Select Committee members
19 or staff?

20 **MS. VAUGHN:** Objection. Relevance.

21 **THE COURT:** I'm going to allow it.

22 **THE WITNESS:** I'm estimating here, but I believe
23 that over 1,000 individuals have cooperated with the Select
24 Committee's request for information or testimony.

25

1 **BY MR. CORCORAN:**

2 **Q.** Well, my question isn't cooperation. It's how
3 many witnesses have been interviewed? Are you saying that
4 more than 1,000 witnesses have been interviewed by the
5 Select Committee or staff?

6 **A.** When you combine informal, formal, depositions,
7 transcribed interviews, I believe that's a ballpark, a
8 ballpark figure.

9 **Q.** Okay.

10 And how many depositions of witnesses have been
11 conducted by the Select Committee or its staff?

12 **A.** I would have to look at our records. Many. It's
13 fair to say many.

14 **Q.** Give us a ballpark figure, please.

15 **A.** Dozens.

16 **Q.** Dozens. Okay.

17 And how many subpoenas have you personally been
18 involved with for the Select Committee?

19 **A.** All of them.

20 **Q.** And how many is that?

21 **A.** I'd have to check our records on that but many
22 subpoenas.

23 **Q.** What's your best ballpark estimate of how many
24 subpoenas you were involved with before the Select
25 Committee?

1 **A.** Many dozens of subpoenas.

2 **Q.** Okay. Now you spoke yesterday. You used the word
3 "urgency" in your testimony. But the Select Committee is
4 still interviewing witnesses. Correct?

5 **A.** That's correct.

6 **Q.** And the Select Committee is still conducting
7 hearings. Correct?

8 **A.** That's correct.

9 **Q.** And the Select Committee is still conducting
10 depositions. Correct?

11 **A.** That is correct.

12 **Q.** And the Select Committee is still receiving and
13 reviewing documents. Correct?

14 **A.** The Select Committee always welcomes relevant
15 documents and information.

16 **Q.** Well, my question is, Is the Select Committee
17 still receiving and reviewing documents, yes or no?

18 **A.** Yes, it is.

19 **Q.** Okay. And the Committee is going to continue its
20 work until the end of this year. Correct?

21 **A.** The Committee is authorized to continue its work
22 until the end of this year.

23 **Q.** Okay. Now you were asked about Government's
24 Exhibit 2, the subpoena, specifically your role with regard
25 to the subpoena. My question is this: You were asked, Were

1 you involved in the decision and the issuance of the
2 subpoena to the defendant? You answered, "I advised on the
3 issuance of the subpoena."

4 My question is this: What did you do? What did
5 you do exactly?

6 **A.** With respect to which aspect?

7 **Q.** Well, with regard to the subpoena, the 10-page
8 document that's Exhibit 2, I just want to understand what it
9 is that you did, you personally did?

10 **A.** I participated with other attorneys on the staff
11 in the drafting of the subpoena. I reviewed it. And I
12 advised the members of the Select Committee about its
13 contents.

14 **Q.** Okay. What day did you first start working on the
15 subpoena for Mr. Bannon?

16 **A.** I don't recall the specific day. It would have
17 been sometime in the weeks before the subpoena was issued.

18 **Q.** On the actual date of the subpoena, which I
19 believe was the 23rd of September, 2021, where were you on
20 that date?

21 **A.** I was in Washington, D.C.

22 **Q.** And were you in your office?

23 **A.** Yes, I was.

24 **Q.** Where is that?

25 **A.** It's in the Longworth House Office Building.

1 Q. Okay. And at the time -- you said that you signed
2 portions of the subpoena. Correct?

3 A. I'm sorry. I didn't hear your question.

4 Q. You testified that you'd signed portions of
5 Government's Exhibit No. 2?

6 A. Not the subpoena itself, the proof of service
7 page.

8 Q. Okay. Your testimony is that you signed the proof
9 of service page on Government's Exhibit No. 2?

10 A. That's correct.

11 Q. Okay. Where were you when you signed Page 2 of
12 Government's Exhibit No. 2?

13 A. To the best of my recollection, I was in my
14 office.

15 Q. Were there any members of Congress in the offices
16 with you that day on the 23rd of September?

17 MS. VAUGHN: Objection. Relevance, Your Honor.

18 THE COURT: Overruled.

19 THE WITNESS: In my physical office?

20 BY MR. CORCORAN:

21 Q. In the offices of the Select Committee.

22 A. I would have to check what the schedules were to
23 see if the members were in their offices on that day, sir,
24 to give you an accurate answer. It wouldn't have been in my
25 physical office, my specific office.

1 **Q.** I guess -- one thing I'm asking is, when you
2 signed the proof of service, were there any members around
3 you at that time? Any members of the Committee?

4 **A.** You mean watching me fill out the form?

5 **Q.** Present.

6 **A.** No, sir.

7 **Q.** Okay. And on that day, September 23rd, 2021, was
8 the House in session such that there were votes?

9 **A.** Again, I'm happy to look at the records but I
10 don't recall.

11 **Q.** Let's look at the subpoena.

12 **MR. CORCORAN:** If we could -- that's in evidence.
13 If we could pull it up, Government's Exhibit No. 2. It's in
14 evidence.

15 **THE COURT:** It can be published to the jury.

16 **DEPUTY CLERK:** It's coming from you all's
17 computer.

18 **THE COURT:** You just need to switch the feed.
19 There we are.

20 **MR. CORCORAN:** I just need the first page.

21 **BY MR. CORCORAN:**

22 **Q.** So if you look at this area there where it says --
23 and the box is checked and it says, "to produce the things
24 identified on the attached schedule touching matters of
25 inquiry committed to said committee or subcommittee, and you

1 are not to depart without leave of said committee or
2 subcommittee."

3 Does that mean that when a person provides
4 documents to the Committee, they are not allowed to leave
5 until the Committee allows them to do so?

6 **A.** When a person provides documents, often they can
7 discuss with the Committee various different ways to deliver
8 them. Sometimes they are delivered in person. Sometimes
9 they are delivered via email. The instructions that are
10 attached to the subpoena provide additional information to
11 help the recipient understand the different procedures that
12 they can engage in.

13 **Q.** And, specifically, with regard to this language,
14 does this mean that, if somebody produces the documents in
15 person, that the Committee will not allow them to leave
16 until the Committee says so? Is that what that means?

17 **A.** That's not a practice that is followed when
18 individuals provide documents to the Committee.

19 **Q.** So that's sort of surplus language in the
20 document? Is that fair to say?

21 **A.** I think that's fair.

22 **Q.** Okay. Is the subpoena itself, this first page, is
23 that something that is a form that you use or is it a hard
24 copy of a document that's filled out?

25 **A.** I'm not sure I understand the question.

1 **Q.** Well, Government's Exhibit 2, the first page, is
2 that typed up fresh each time a subpoena is issued to a
3 recipient?

4 **A.** Well, they are individualized to focus on the
5 specific recipient of the subpoena and the address of the
6 recipient.

7 **Q.** And the parts that aren't individualized, are you
8 filling out a form -- is the person who is filling it out
9 doing so on a computer or on a typewriter or on a piece of
10 paper?

11 **A.** We use computers.

12 **Q.** Okay. So is it fair to say that some of the
13 information that is depicted on Page 1 of Government's
14 Exhibit 2 is just part of a form that's on your computer
15 that's filled out with individual information?

16 **A.** The typewritten portions are generally done on
17 computer. The signature is by the Chair and by the Clerk of
18 the House of Representatives.

19 **Q.** If you look here where it says under "Production
20 of" -- to produce things identified on the attached
21 schedule, it gives a "place of production." That's your
22 Select Committee office is; is that right?

23 **A.** That's part of your office. Right.

24 **Q.** In the Longworth House Office building. Correct?

25 **A.** That's correct.

1 **Q.** And the date October 7, 2021, did you type in that
2 date?

3 **A.** I don't recall, sir.

4 **Q.** How was that date arrived upon? In other words,
5 who decided October 7 was going to be the date that is on
6 this subpoena?

7 **A.** The ultimate decision-maker for the Select
8 Committee is the Chair and Members of the Select Committee.

9 **Q.** So you're saying that Chairman Thompson decided
10 that Steve Bannon should appear to produce documents or
11 produce them in electronic form on October 7th, 2021; is
12 that your testimony?

13 **A.** My testimony is that that subpoena is directing
14 Mr. Bannon to produce documents on that date, and the person
15 who is authorized to sign that subpoena for the Select
16 Committee is the Chairman of the Select Committee,
17 Chairman Bennie Thompson.

18 **Q.** I understand both of the things that you just said
19 but I've got a slightly different question. This is a human
20 process. So I want to know what human decided that
21 October 7, 2021 is the date that Steve Bannon should appear
22 to produce documents. What human being made that decision?

23 **A.** Sir, I'm not sure I'm -- I thought I'd answered
24 your question.

25 **Q.** You didn't. So let me --

1 **A.** Chairman Thompson signs the subpoena. He has the
2 authority to demand that witnesses comply with the subpoena.
3 He has the authority for the Committee to sign the subpoena.

4 **Q.** I understand that the Chairman has the authority
5 to sign the Committee -- the subpoena. And I also
6 understand your testimony on direct that if the Chairman
7 doesn't sign the subpoena, that it's invalid; is that
8 correct?

9 **A.** A valid subpoena requires the Chair's signature,
10 yes.

11 **Q.** Okay. Now, back to my question as to who, what
12 person, decided to put October 7?

13 **MS. VAUGHN:** Your Honor, the witness has answered
14 the question.

15 **THE COURT:** I think that I am going to allow this
16 question, at least one more time. I think the witness has
17 answered portions but not the question directly. If there
18 is an answer.

19 **BY MR. CORCORAN:**

20 **Q.** Do you know who decided that Steve Bannon should
21 appear -- do you have firsthand knowledge, firsthand
22 knowledge of who the person is who decided that Steve Bannon
23 should appear on October 7, 2021, to produce documents?

24 **A.** With any subpoena there is generally discussion
25 among staff, and there is advice given to the members of the

1 Select Committee on what is the appropriate language in the
2 subpoena. And then the ultimate decision for what is
3 reflected in the subpoena is made by the individual who has
4 the authority to sign the subpoena.

5 Q. Did you participate in the discussion that you
6 just described as to what date should -- the October 7, 2021
7 date for the production of documents? Did you participate
8 in that decision?

9 A. I did. To the best of my recollection, I did.
10 Yes, sir.

11 Q. Who was present in that discussion?

12 MS. VAUGHN: Objection. Relevance.

13 THE COURT: Overruled.

14 THE WITNESS: I don't recall the individuals who
15 were in that specific discussion, but generally, as I said,
16 there is a discussion among staff about what to recommend
17 and there's a discussion with the members about what is the
18 appropriate date and schedule to put on documents such as
19 subpoenas.

20 BY MR. CORCORAN:

21 Q. Okay. I understand the general practice, but I
22 want to know, sitting here today, do you remember any
23 discussion with any members of Congress or anybody else --

24 MS. VAUGHN: Objection. Relevance.

25 Can we have a sidebar, Your Honor?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

THE COURT: You may. We will go on the husher for sidebar.

(Sidebar discussion.)

[REDACTED]

1

[REDACTED]

2

[REDACTED]

3

[REDACTED]

4

[REDACTED]

5

[REDACTED]

6

[REDACTED]

7

[REDACTED]

8

[REDACTED]

9

[REDACTED]

10

[REDACTED]

11

[REDACTED]

12

[REDACTED]

13

[REDACTED]

14

[REDACTED]

15

[REDACTED]

16

[REDACTED]

17

[REDACTED]

18

[REDACTED]

19

[REDACTED]

20

[REDACTED]

21

[REDACTED]

22

[REDACTED]

23

[REDACTED]

24

[REDACTED]

25

[REDACTED]

1 [REDACTED] [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED] [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED] [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

[REDACTED]

(Sidebar concluded.)

THE COURT: We are back on the fully-public record.

BY MR. CORCORAN:

Q. Okay. Looking again at Government's Exhibit No. 2, the date of October 14, '21. I understand that you testified that that's the date that you believe Steve Bannon should have appeared to testify; is that accurate?

A. That's correct.

Q. And who -- do you have direct knowledge, sitting here today, who selected October 14th, 2021 as the date for

1 Mr. Bannon to testify?

2 **A.** I can tell you to the best of my recollection.

3 **Q.** Direct knowledge only. Do you have direct
4 knowledge --

5 **THE COURT:** She was starting to say, To the best
6 of my recollection. I would like you to not interrupt the
7 witness.

8 **MR. CORCORAN:** Very well, Your Honor.

9 **THE WITNESS:** To the best of my recollection,
10 because of the multiple roles that we understood Mr. Bannon
11 potentially had with respect to the events of January 6th,
12 at the time that we put the subpoena together, there was a
13 general interest in obtaining information from him
14 expeditiously because we believed that this information
15 could potentially lead us to other relevant witnesses or
16 other relevant documents or, perhaps, inform the Committee
17 about avenues that it shouldn't go down.

18 So to the best of my recollection, there was a
19 general interest in including deadlines that required
20 expeditious response.

21 **BY MR. CORCORAN:**

22 **Q.** What human -- what human set that deadline?

23 **A.** Again, sir, I would -- I can speak to the general
24 process. I cannot recall the specific discussions. But it
25 generally would have involved senior staff, including

1 myself, discussing the different considerations and making
2 recommendation to the members of the Committee about the
3 appropriate dates.

4 **Q.** Now, was there any outside deadline that the
5 Committee faced that bore upon the October 7, 2021 date in
6 the subpoena?

7 **A.** I'm not sure what you are referring to by "outside
8 deadline".

9 **Q.** I'm just asking, was there any kind of a deadline
10 that was happening in the world that required the Select
11 Committee to pick October 7th, 2021?

12 **A.** The Committee's authorization is just through the
13 end of this year. So the Committee is operating under a
14 very tight timeframe; so that's the overarching deadline
15 that's governing here.

16 **Q.** Okay. And was there anything other than the
17 overarching deadline that ends at the end of this year,
18 2022, that caused the Select Committee Chairman or other
19 person to pick October 14, 2021? Was there a specific
20 outside deadline that forced the selection of that date?

21 **A.** As with the other subpoenas that are issued by the
22 Committee, the interest of the Committee is in obtaining
23 information as expeditiously as possible; that is the
24 governing principle.

25 **Q.** Ms. Amerling, the signature at the bottom that

1 says "Chairman or authorized member", did you see
2 Chairman Thompson sign Government's Exhibit No. 2?

3 **A.** I believe that I did but I can't say for certain.
4 I've seen him sign some but not all.

5 **Q.** On Government's Exhibit 2, the second page is the
6 proof of service. I think you testified that you filled out
7 this proof of service, Ms. Amerling; is that correct?

8 **A.** That's correct.

9 **Q.** And that's your signature on the line that says
10 "signature of server"?

11 **A.** That's right.

12 **Q.** And where it says "Served by - print name", you
13 printed out your name. Correct?

14 **A.** That's right, yes.

15 **Q.** On "Title", you provided that information on that
16 line; is that correct?

17 **A.** That's correct.

18 **Q.** And on "Manner of service", you wrote "emailed to
19 attorney for Mr. Bannon, Robert Costello" and then an email
20 address; is that correct?

21 **A.** That's correct.

22 **Q.** And did you write in the date "9/23/2021"?

23 **A.** I did.

24 **Q.** Now, you understand that sometimes the U.S.
25 Marshals serve the subpoenas. Correct?

1 **A.** That's correct.

2 **Q.** And the proof of service is the page that is
3 intended to prove when service of the subpoena is
4 accomplished. Correct?

5 **A.** That's correct.

6 **Q.** Okay. You filled out this proof of service before
7 service was accepted. Correct?

8 **A.** That's correct.

9 **Q.** Now, when you were interviewed by the FBI in this
10 case on November 2nd, 2021, do you recall who was present?

11 **A.** Several FBI agents and several prosecutors.

12 **Q.** Okay. And were the prosecutors seated at the
13 table here present?

14 **A.** They were.

15 **Q.** Okay. And were you advised that you had to tell
16 the truth to the FBI agents?

17 **A.** Yes.

18 **Q.** Okay. Did you tell the FBI agents at that time
19 that you filled out the proof of service on this subpoena
20 before service was actually accomplished?

21 **A.** I don't recall, sir.

22 **Q.** Okay.

23 **MR. CORCORAN:** If we could show the witness an
24 exhibit for identification purposes, Your Honor, and that is
25 Defense Exhibit No. 2, which is not in evidence.

1 **BY MR. CORCORAN:**

2 Q. All right, ma'am. Take your time and read through
3 that. My question is, Does that refresh your recollection
4 as to whether you told the FBI, when they interviewed you,
5 that you had filled out the proof of service before it was
6 actually served?

7 **MS. VAUGHN:** Your Honor, maybe counsel can
8 correct --

9 **THE COURT:** I think they are trying to direct her
10 to a particular page. I agree. I think, especially because
11 she's only seeing it on the computer screen, she needs to be
12 directed to a particular page and a particular paragraph.
13 You don't want to do that?

14 **MR. CORCORAN:** Well --

15 **THE COURT:** You're asking her whether an
16 eight-page document refreshes her recollection but you're
17 only showing her the first page.

18 **MR. CORCORAN:** I'm showing her the whole document.

19 **THE COURT:** Not from what I can see.

20 **THE WITNESS:** I'm looking at Page 2 of 8 right
21 now. Is that the page you're directing me to?

22 **MR. CORCORAN:** You'll see why I can't say -- at
23 this moment direct her to it.

24 **THE COURT:** Okay.

25 **MR. CORCORAN:** The question is, Did she tell the

1 FBI.

2 **THE COURT:** Okay. Ask that question.

3 **BY MR. CORCORAN:**

4 **Q.** Did you tell the FBI that you filled out the proof
5 of service suggesting that it had been served before it had
6 actually been served?

7 **A.** I don't recall at this point what I told the FBI,
8 but if there's a record of it, I'm happy to look at it.

9 **Q.** Perfect. If you would take the time, review it
10 and see if that refreshes your recollection as to whether
11 you mention it at all to the FBI.

12 **A.** But you're showing me an eight-page document. Is
13 there a particular portion you're directing me to?

14 **THE COURT:** She can review the eight-page
15 document.

16 **MR. CORCORAN:** You can review the eight pages.

17 **THE COURT:** No, but you control the pages.

18 **MR. CORCORAN:** Oh.

19 **BY MR. CORCORAN:**

20 **Q.** Tell me when you're ready to move on.

21 **A.** You can go to the next page.

22 **Q.** Is that Page 3?

23 **A.** Page 3, yeah.

24 **MR. CORCORAN:** Your Honor, I am happy to give her
25 a hard copy if that expedites the process.

1 **THE COURT:** That would be fine. You may approach
2 the witness and hand that to her. I think that probably
3 will speed things up.

4 **MR. CORCORAN:** (Handed the exhibit to the
5 witness.)

6 **THE WITNESS:** Correct me if I am mistaken, because
7 I am trying to read this quickly, but I don't think we
8 discussed proof of service in this interview; is that right?

9 **MR. CORCORAN:** Well, that's my question. Does
10 that refresh your recollection as to --did you tell
11 the --the question is, did you --

12 **MS. VAUGHN:** Your Honor, the witness just
13 testified they didn't discuss --

14 **THE COURT:** Ms. Vaughn, let me hear the question
15 first.

16 **BY MR. CORCORAN:**

17 **Q.** The question pending is, Did you tell the FBI that
18 you had filled out the proof of service before the subpoena
19 was actually served?

20 **A.** I don't remember talking about the proof of
21 service issue, sir. I don't see it referred to here so --
22 but if there was a discussion, I'm happy to look at it, but
23 I don't recall discussing that issue.

24 **Q.** Let me move to another issue, and that is the
25 actual service of the subpoena. You described how you

1 communicated with Bob Costello, who at the time was an
2 attorney for Mr. Bannon, regarding acceptance of service of
3 the subpoena; is that correct?

4 **A.** That's correct.

5 **Q.** And Mr. Costello got back to you the next day and
6 informed you that, in fact, Steve Bannon was voluntarily
7 accepting service of the subpoena. Correct?

8 **A.** That's correct.

9 **Q.** Now, among -- you described, with regard to
10 putting together Exhibit 2, the subpoena and its
11 attachments, various portions of that, and I want to go
12 through that testimony so I understand it.

13 One thing I want to understand is, the letter --
14 the letter from Chairman Thompson that accompanies the
15 subpoena indicates that the deposition rules were provided
16 to Mr. Bannon. Were all of the deposition rules provided to
17 Mr. Bannon at that time?

18 **A.** Deposition regulations were provided to Mr. Bannon
19 at that time.

20 **Q.** Okay. And are you familiar -- let's look at the
21 very last page of Exhibit No. 2, which is in evidence, Page
22 41.

23 **THE COURT:** This is Government's Exhibit 2. And
24 when it's pulled up, it can be published to the jury.

25

1 **BY MR. CORCORAN:**

2 **Q.** And now I will focus your attention just on one
3 paragraph. So this is a page from the Congressional Record.
4 Correct?

5 **A.** That's correct.

6 **Q.** And when I say "this" it's Exhibit 2 at US000417.
7 And are these the regulations for the use of deposition
8 authority that govern the 117th Congress?

9 **A.** That's correct.

10 **Q.** And this is the 117th Congress. Correct?

11 **A.** That's correct.

12 **Q.** So these rules apply to the Select Committee
13 depositions. Correct?

14 **A.** That's correct.

15 **Q.** Okay. Paragraph 11, would you read that to the
16 jury?

17 **A.** It says, "The witness shall not be required to
18 testify unless the witness has been provided with a copy of
19 Section 3(b) of House Resolution 3, 117th Congress and these
20 regulations."

21 **Q.** Okay. Now you never provided Section 3(b) --

22 **MS. VAUGHN:** Objection. The Court's already ruled
23 on the relevance of this.

24 **THE COURT:** Let's go to a sidebar.

25 (Discussion at sidebar.)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

[REDACTED]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

[REDACTED]

(Sidebar concluded.)

THE COURT: We are back from sealed or husher public record.

MR. CORCORAN: All right. If we could go to the third page of Government's Exhibit No. 2, which is in evidence.

BY MR. CORCORAN:

Q. Now, Ms. Amerling, did you draft this letter?

A. I was one of several staff that drafted the letter and reviewed it.

Q. What portions of the letter are your words?

A. At this date I don't recall specifically, sir.

Q. Did Chairman Thompson draft any of the words in this letter?

A. Generally, the process is that staff drafts

1 letters and provides them for the review of the members, the
2 Committee and the Chair.

3 Q. I understand generally --

4 A. I would assume that would have been the process
5 here but I can't remember specifically.

6 Q. I understand generally, but my questions are very
7 specific. Do you recall -- well, did Chairman Thompson
8 draft any language in this letter?

9 A. Again, I cannot remember the specifics for this
10 letter. But the general process is that staff drafts the
11 letter and the members review and sign.

12 Q. Were you present when this letter was signed?

13 A. I don't recall.

14 Q. Now, you indicated on direct examination that the
15 third paragraph of this letter refers generally to reasons
16 why the Committee might want to speak to Steve Bannon; is
17 that correct?

18 A. That's correct.

19 Q. Okay. And I just wanted to zero in and ask you,
20 in that third paragraph, it appears that two of the
21 reasons -- you used the words, on direct examination, that
22 there were "public reports of certain things". Do you
23 remember using those words?

24 A. That's right.

25 Q. Okay. And were the public reports about a Willard

1 Hotel meeting that is referenced in this letter? Does that
2 come from a book that's entitled "Peril"?

3 **A.** That was one of the sources, and that was the
4 source cited in this letter.

5 **Q.** Okay. And the second issue, which is -- or the
6 second area of why the Select Committee might want to speak
7 to Mr. Bannon appears to be some communications with
8 then-President Donald J. Trump.

9 Is the source of that interest by Select Committee
10 or staff also the book entitled "Peril"?

11 **A.** That was cited as one of the sources, yes.

12 **Q.** Have you read "Peril"?

13 **A.** I have, yes, sir.

14 **Q.** Okay. The third issue, it appears, is that
15 Mr. Bannon, on his show on January 5th, 2021, purportedly
16 spoke about the potential for violence on January 6th, 2021.
17 And my question is this: Is the source that is cited in
18 this letter, for the reason that you want to talk to
19 Mr. Bannon, a CNN article?

20 **A.** Yes, that's what it looks like, yes.

21 **Q.** Okay. And you're aware that prior to January 6th,
22 and prior to -- on January 5th and earlier, there was
23 widespread reporting in the general media that there might
24 be violence on January 6, 2021. Are you aware of that?

25 **A.** I am aware of that, yes.

1 **Q.** Now turning to what I think is the fourth page of
2 Government's Exhibit No. 2, the schedule, and on -- this is
3 basically the schedule of topics, 17 different topics, where
4 the Committee was asking if he had -- if Mr. Bannon had any
5 documents that pertain to these 17 different categories; is
6 that accurate?

7 **A.** That's correct.

8 **Q.** Okay. And is this schedule something that you
9 yourself drafted?

10 **A.** Again, it would have been the process that I
11 described: A number of staff contribute to the drafting
12 process, including myself. So I was and would have been
13 involved in this.

14 **Q.** And is this schedule that we're looking at, Page 4
15 of Government's Exhibit No. 2, a schedule that, for the most
16 part, was sent to a number of different subpoena recipients?

17 **A.** I can speak generally. The process of drafting
18 subpoenas involves looking at what information might be
19 particularly pertinent to the individual receiving the
20 subpoena. So the subpoenas will look different from each
21 other.

22 **Q.** And I -- really what I'm asking is, you know,
23 there are 17 categories here on this schedule. And was
24 there overlap in those 17 categories between what was sent
25 to Steve Bannon and what was sent to several other subpoena

1 recipients?

2 **A.** Sir, we don't generally publish the subpoena
3 schedules, in part because we don't want to give a roadmap
4 of what the investigation is doing. So I don't know that I
5 want to get specific about what we put in other people's
6 subpoenas.

7 **Q.** We're not asking for a roadmap on anything. I'm
8 asking you whether -- essentially, is there boilerplate on
9 this schedule that was sent not only to Steve Bannon but to
10 other subpoena recipients?

11 **A.** I would be happy to go back and look if there were
12 specific paragraphs or specific language that you're
13 concerned about to address that question. I can't, sitting
14 here, know what language might be repeated in other
15 subpoenas and what might be specific to him.

16 **Q.** And I'm not asking for specifics on this topic. I
17 want to know if there's overlap between this and other
18 subpoenas. In other words --

19 **MS. VAUGHN:** Objection. Asked and answered.

20 **THE COURT:** I understand the objection. I'll
21 allow one last question on this topic.

22 **BY MR. CORCORAN:**

23 **Q.** In other words, did you create, did you draft this
24 schedule of 17 areas that you might want to talk to Steve
25 Bannon about from scratch for the subpoena or was it used

1 as -- well, in part, in other subpoenas that were given to
2 other subpoena recipients?

3 **A.** I believe I've answered the question, sir. But
4 just to elaborate, when we draft subpoenas, it's a process
5 that doesn't just involve me. This subpoena didn't just
6 involve me but I was involved.

7 And generally what we do is we try to include the
8 items that would be most related to information that the
9 specific recipient might have. So they're going to vary
10 from individual to individual. They are not going to be
11 identical carbon copies of each other.

12 **Q.** And with regard to the documents that you
13 requested of Steve Bannon in these various categories, you
14 don't have any firsthand knowledge as to whether Steve
15 Bannon has any documents at all that are responsive to these
16 17 areas. Correct?

17 **A.** Part of what happens in the subpoena process, sir,
18 is that the recipient has the opportunity to respond and
19 say, I do have documents responsive to these particular
20 items, and I don't have documents responsive to these other
21 items; and that process helps inform our investigation.

22 **Q.** I understand the process but I'm asking you, just
23 to be clear, do you have firsthand knowledge whether Steve
24 Bannon has any documents that are responsive to the
25 subpoena?

1 **A.** I have no basis for knowing that one way or the
2 other.

3 **Q.** Okay. All right. Now, you testified about your
4 interactions with --

5 **MR. CORCORAN:** And, Your Honor, whenever there's a
6 need for a break, let me know or I'll just keep going. This
7 is a convenient time in terms of cross for a break. I'm
8 moving to a new topic.

9 **THE COURT:** How long will this next topic take?
10 I'm not going to hold you, obviously, to a specific time.

11 **MR. CORCORAN:** Well, it's kind of a group,
12 actually.

13 **THE COURT:** Why don't we take a recess then.
14 We'll recess until -- this will be our lunch recess,
15 everyone -- until 1:15, when we will be back on the record.
16 Okay?

17 Thank you, ma'am. You are excused for the lunch.

18 **THE WITNESS:** Thank you.

19 **DEPUTY CLERK:** All rise.

20 (Lunch recess taken at 12:21 p.m.)

21 (Jury exited the courtroom.)

22 **MR. CORCORAN:** One quick legal issue once --

23 **THE COURT:** We'll have Ms. Lesley come back. I
24 believe we should excuse the witness for this.

25 **MR. CORCORAN:** I think so, Your Honor.

1 **THE COURT:** Ms. Amerling may depart the courtroom.
2 Mr. Schoen.

3 **MR. SCHOEN:** Yes, Your Honor. It's really just a
4 request, very brief one, but I think we learned the lesson
5 yesterday about the importance of reading the Court's
6 carefully thought-out July 11th order.

7 So today the question came up about Mr. Corcoran
8 apparently was going to pursue a line of questioning on this
9 Rule 3b, as I understood the intention of the examination.

10 I just ask the Court over lunch if it might take a
11 look at Pages 131 to the top of 132 on that issue
12 specifically. That could be over lunch, unless the Court
13 has it here.

14 **THE COURT:** I don't, but I will do so. And I
15 suspect I understand what you're talking about. So I will
16 do so.

17 Thank you.

18 **MR. SCHOEN:** Thank you, Your Honor.

19 **THE COURT:** We are now in recess.

20 (Lunch recess was taken at 12:23 p.m.)
21
22
23
24
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C E R T I F I C A T E

I, **Lorraine T. Herman, Official Court Reporter,**
certify that the foregoing is a true and correct transcript
of the record of proceedings in the above-entitled matter.

July 20, 2022
DATE

/s/
Lorraine T. Herman

BY MR. CORCORAN:

[15] 684/1 685/25
689/20 690/21 694/19
695/20 700/18 701/21
705/1 706/3 706/19
707/16 708/25 711/17
715/22

BY MS. VAUGHN: [53]

620/19 621/3 621/19
622/24 624/20 626/2
627/25 628/13 630/8
632/22 633/23 636/2
640/20 641/12 643/11
645/13 646/18 647/19
649/1 651/3 651/24
652/4 652/21 653/4
654/23 655/8 657/14
658/9 659/14 660/9
661/2 661/17 662/11
663/18 664/14 666/16
667/7 668/14 669/12
670/8 670/23 672/5
673/2 674/9 676/4
676/21 676/25 677/10
679/8 679/25 681/1
681/21 682/19

BY MS. VAUGHN: [2]

642/19 665/15

DEPUTY CLERK: [6]

602/3 619/7 619/16
664/10 690/16 717/19

MR. CORCORAN: [48]

602/13 607/20 607/23
609/5 610/9 610/18
611/3 611/23 625/13
639/17 643/4 647/13
651/20 654/20 657/22
665/25 666/4 666/8
669/19 676/17 680/9
683/24 690/12 690/20
696/14 697/4 697/17
697/21 698/6 698/11
701/8 704/23 705/14
705/18 705/22 705/25
706/16 706/18 706/24
707/4 707/9 710/10
711/8 711/14 717/5
717/11 717/22 717/25

MR. SCHOEN: [8]

616/2 616/25 617/14
618/18 618/22 619/4
718/3 718/18

MS. VAUGHN: [88]

602/8 602/19 604/15
605/5 605/20 612/1
612/12 612/22 613/12
613/22 614/25 615/25
617/17 618/14 620/17
621/1 621/17 622/22
624/18 626/1 627/23
628/11 630/6 632/20
633/21 635/25 641/10
642/16 643/2 643/8
645/11 647/6 647/11
647/16 648/24 651/1
651/18 652/2 652/19
653/1 655/5 657/12
657/20 658/8 659/12
660/6 660/24 661/14
662/9 663/17 663/25
664/13 665/13 665/23
666/15 667/4 668/13
669/10 669/17 670/7
670/21 672/3 672/23
674/6 676/1 676/15
676/23 677/8 679/6
679/22 680/7 680/23
681/19 682/17 683/21
685/20 689/17 694/13
695/12 695/24 696/4
699/2 699/22 705/7
707/12 709/22 710/2
715/19

THE COURT: [92]

602/12 602/16 604/9
604/18 605/19 607/13
607/21 608/17 610/3
610/16 610/20 611/22
611/24 612/9 612/13
613/1 613/14 614/16
615/9 616/1 616/24
617/13 617/15 617/25
618/21 618/25 619/5
619/9 619/13 619/18
625/15 639/18 643/5
646/16 647/9 647/14
647/18 651/21 654/19
654/22 657/25 663/23
664/1 664/8 664/12
666/2 666/5 666/11
669/20 676/18 680/11
683/22 685/21 689/18
690/15 690/18 694/15
695/13 696/1 697/1
697/12 697/19 698/3
698/8 699/1 699/18
700/4 700/16 701/5

705/9 705/15 705/19
705/24 706/2 706/14
706/17 707/1 707/14
708/23 709/24 710/1
710/8 711/2 711/9
711/12 715/20 717/9
717/13 717/23 718/1
718/14 718/19

THE WITNESS: [9]

619/12 639/20 685/22
689/19 695/14 701/9
705/20 707/6 717/18

'21 [1] 700/20

'Subpoena' [1] 671/18

, Okay [1] 605/19

/s [1] 720/9

0

0670 [1] 602/4

1

1,000 [2] 685/23 686/4

10-page [2] 622/12
688/7

100-6 [1] 600/15

103 [1] 605/14

10:00 [6] 621/11
621/16 648/2 648/7

650/11 650/15

10:38 [1] 664/6

10:39 [1] 664/7

10:55 [2] 664/4 664/6
11 [3] 633/22 633/24
709/15

117th [3] 709/8 709/10
709/19

11:00 [1] 664/7

11th [1] 718/6

12 [2] 633/22 635/6

12:21 [1] 717/20

12:23 [1] 718/20

13 [3] 649/8 649/9
665/24

131 [1] 718/11

132 [1] 718/11

13th [4] 665/11 665/17
665/21 666/18

14 [4] 620/2 671/3

700/20 702/19

621/15 623/9
661/11 662/1 665/2
665/6 668/9 668/15
670/19 673/15 700/25
15 [4] 636/1 636/3
664/1 664/2
15th [5] 668/19 669/15
670/16 675/13 675/19

16 [2] 637/6 637/7

17 [9] 636/1 638/7
664/6 714/3 714/5
714/23 714/24 715/24
716/16

1793 [1] 600/13
18th [9] 674/16 676/6
677/5 677/21 678/7
678/10 678/13 678/17
681/15

19 [2] 649/22 649/23

192 [2] 662/25 673/20

194 [2] 662/25 673/20

19th [6] 668/25 673/18
675/6 680/5 681/3
683/15

1:15 [1] 717/15

1:21-670 [1] 600/3

2

20 [2] 600/5 720/9

20001 [2] 600/12
600/23

201 [1] 600/18

202-252-1793 [1]
600/13

2020 [6] 627/3 629/1
630/14 634/2 671/6
671/8

2021 [42] 621/11
621/16 624/2 624/25
630/11 630/18 631/15
631/19 643/1 645/15
652/10 652/12 653/17
654/6 658/12 662/1
665/17 671/2 671/3
671/5 672/16 673/16
673/18 674/16 677/5
680/6 688/19 690/7
693/1 693/11 693/21
694/23 695/6 700/25
702/5 702/11 702/19
703/22 704/10 713/15
713/16 713/24

2021-0670 [1] 602/4

2022 [3] 600/5 702/18

2	7	8	9
<p>Case 1:21-cr-00679-CJN Document 178 Filed 12/21/22 Page 123 of 149</p> <p>2022... [1] 720/9 21201 [1] 600/19 2225 [1] 600/19 23 [1] 652/10 23rd [8] 642/11 642/25 643/10 643/17 647/21 688/19 689/16 690/7 24th [5] 643/1 645/15 645/21 647/23 648/6 25th [1] 600/18 2800 [1] 600/15 2nd [1] 704/10</p>	<p>7th [15] 621/11 623/8 627/21 648/2 648/8 650/12 650/15 651/8 652/12 659/17 666/20 670/18 673/5 693/11 702/11</p>	<p>673/23 674/25 675/19 678/1 679/9 681/12 683/18 684/2 687/23 688/12 695/16 695/17 701/17 702/2 707/20 712/25 713/16 715/5 715/13 715/25 717/3 718/5 718/7 718/15 above [10] 616/11 616/12 616/19 617/3 617/21 617/23 618/5 653/7 655/14 720/5 above-entitled [1] 720/5 above-referenced [1] 653/7 accept [6] 644/10 644/15 644/23 645/23 645/25 655/14 acceptance [1] 708/2 accepted [3] 646/4 653/7 704/7 accepting [2] 656/22 708/7 accident [1] 616/9 accompanies [2] 623/13 708/14 accompanying [2] 623/8 644/25 accomplished [2] 704/4 704/20 accordance [1] 628/16 according [3] 616/14 637/21 664/5 Accordingly [4] 627/8 661/7 673/4 682/4 account [3] 629/6 629/11 638/20 accounts [6] 628/22 628/23 629/4 629/12 634/11 637/21 accurate [3] 689/24 700/22 714/6 acknowledged [1] 615/16 acontextual [1] 607/16 across [1] 614/12 Act [1] 640/16 acting [1] 618/5 action [4] 600/3 610/14 613/5 663/2 actions [5] 609/15 609/18 609/22 609/23 684/13</p>	<p>activities [5] 624/1 624/23 626/10 629/21 635/14 acts [1] 615/3 actual [5] 621/5 630/19 631/18 688/18 707/25 actually [11] 606/18 628/6 646/8 651/25 658/16 679/9 704/20 705/6 706/6 707/19 717/12 add [3] 647/11 663/16 668/12 added [3] 639/10 663/17 668/13 additional [9] 651/9 651/12 669/3 674/13 674/20 675/20 677/22 679/11 691/10 address [4] 642/10 692/5 703/20 715/13 addressed [1] 674/14 adjournment [2] 677/18 682/4 adjudicating [1] 608/6 Adjusted [1] 647/16 administration [1] 637/15 admit [7] 643/3 651/19 657/21 665/24 669/18 676/16 680/8 admitted [31] 601/9 601/9 601/10 601/10 601/11 612/2 625/17 625/23 643/5 643/7 651/21 651/23 658/1 658/2 658/5 666/5 666/7 666/13 669/21 669/23 670/1 670/4 670/6 676/18 676/20 680/12 680/14 680/17 680/18 680/18 680/21 admitting [1] 625/20 advanced [1] 633/10 advertising [1] 635/7 advice [3] 616/23 617/8 694/25 advise [1] 645/24 advised [5] 662/14 677/14 688/2 688/12 704/15 advisement [2] 614/18 615/22</p>
<p>3</p> <p>30 [1] 627/2 333 [1] 600/22 334-395-6611 [1] 600/16 36106 [1] 600/16 3b [1] 718/9</p>	<p>8</p> <p>8th [6] 657/16 658/12 664/17 665/6 666/19 672/1</p>	<p>9</p> <p>9/23/2021 [1] 703/22 9:02 [1] 600/6 9:26 [1] 619/15</p>	<p>9</p> <p>9/23/2021 [1] 703/22 9:02 [1] 600/6 9:26 [1] 619/15</p>
<p>4</p> <p>41 [1] 708/22 410-385-2225 [1] 600/19 4th [1] 600/12</p>	<p>A</p> <p>a.m [8] 600/6 619/15 621/11 621/16 648/2 662/1 664/7 664/7 ability [2] 609/25 682/2 able [4] 608/4 616/20 635/22 655/5 about [106] 603/1 603/12 603/22 603/24 604/3 604/7 604/16 604/16 605/17 605/24 606/1 606/3 606/6 606/7 606/12 606/14 606/16 607/16 607/18 607/22 608/5 608/9 608/20 609/12 609/14 609/16 609/17 609/19 610/7 610/16 610/18 611/1 611/6 611/19 612/6 612/17 612/19 612/23 613/10 613/25 614/14 615/1 615/17 617/11 617/20 620/1 620/23 621/5 621/14 622/3 622/21 624/4 625/25 626/20 626/20 626/24 629/20 632/4 637/2 637/9 638/9 640/7 640/22 640/23 641/18 645/7 646/8 647/4 647/25 648/9 651/16 653/13 653/14 655/22 658/17 659/2 662/6 663/15 663/19 666/24 669/1 671/10</p>	<p>acceptance [1] 708/2 accepted [3] 646/4 653/7 704/7 accepting [2] 656/22 708/7 accident [1] 616/9 accompanies [2] 623/13 708/14 accompanying [2] 623/8 644/25 accomplished [2] 704/4 704/20 accordance [1] 628/16 according [3] 616/14 637/21 664/5 Accordingly [4] 627/8 661/7 673/4 682/4 account [3] 629/6 629/11 638/20 accounts [6] 628/22 628/23 629/4 629/12 634/11 637/21 accurate [3] 689/24 700/22 714/6 acknowledged [1] 615/16 acontextual [1] 607/16 across [1] 614/12 Act [1] 640/16 acting [1] 618/5 action [4] 600/3 610/14 613/5 663/2 actions [5] 609/15 609/18 609/22 609/23 684/13</p>	<p>add [3] 647/11 663/16 668/12 added [3] 639/10 663/17 668/13 additional [9] 651/9 651/12 669/3 674/13 674/20 675/20 677/22 679/11 691/10 address [4] 642/10 692/5 703/20 715/13 addressed [1] 674/14 adjournment [2] 677/18 682/4 adjudicating [1] 608/6 Adjusted [1] 647/16 administration [1] 637/15 admit [7] 643/3 651/19 657/21 665/24 669/18 676/16 680/8 admitted [31] 601/9 601/9 601/10 601/10 601/11 612/2 625/17 625/23 643/5 643/7 651/21 651/23 658/1 658/2 658/5 666/5 666/7 666/13 669/21 669/23 670/1 670/4 670/6 676/18 676/20 680/12 680/14 680/17 680/18 680/18 680/21 admitting [1] 625/20 advanced [1] 633/10 advertising [1] 635/7 advice [3] 616/23 617/8 694/25 advise [1] 645/24 advised [5] 662/14 677/14 688/2 688/12 704/15 advisement [2] 614/18 615/22</p>
<p>5</p> <p>50 [1] 604/2 503 [2] 623/2 623/3 555 [1] 600/12 5:05 [1] 652/12 5th [5] 626/7 626/11 627/6 713/15 713/22</p>	<p>6</p> <p>611 [1] 600/16 670 [1] 600/3 6:00 [1] 674/15 6:02 [1] 677/5 6:38 [1] 643/18 6th [32] 621/9 621/14 623/20 624/4 624/24 626/10 626/16 627/4 629/23 630/11 630/17 631/2 632/3 632/17 633/6 633/11 633/18 634/9 635/1 635/9 636/20 637/5 637/17 638/11 639/22 640/8 644/20 653/17 654/6 701/11 713/16 713/21</p>	<p>6</p> <p>611 [1] 600/16 670 [1] 600/3 6:00 [1] 674/15 6:02 [1] 677/5 6:38 [1] 643/18 6th [32] 621/9 621/14 623/20 624/4 624/24 626/10 626/16 627/4 629/23 630/11 630/17 631/2 632/3 632/17 633/6 633/11 633/18 634/9 635/1 635/9 636/20 637/5 637/17 638/11 639/22 640/8 644/20 653/17 654/6 701/11 713/16 713/21</p>	<p>6</p> <p>611 [1] 600/16 670 [1] 600/3 6:00 [1] 674/15 6:02 [1] 677/5 6:38 [1] 643/18 6th [32] 621/9 621/14 623/20 624/4 624/24 626/10 626/16 627/4 629/23 630/11 630/17 631/2 632/3 632/17 633/6 633/11 633/18 634/9 635/1 635/9 636/20 637/5 637/17 638/11 639/22 640/8 644/20 653/17 654/6 701/11 713/16 713/21</p>

A	Case 1:21-cr-00670-GJN Document 178 Filed 12/31/23 Page 124 of 149	658/16 659/15 660/6 630/9 630/19 632/23	647/1 647/1
<p>advising [1] 657/3 advisor [2] 631/16 634/12 affidavit [1] 616/15 after [11] 622/25 650/20 652/15 654/24 656/5 664/19 664/22 675/17 681/7 682/21 683/16 afternoon [1] 653/17 again [19] 607/9 615/14 617/17 619/19 625/14 636/16 648/25 661/24 665/20 670/4 670/16 673/22 674/22 682/6 690/9 700/19 701/23 712/9 714/10 against [6] 605/25 606/15 609/12 634/19 640/13 663/3 agencies [3] 634/18 640/11 640/13 agent [7] 602/11 605/24 611/1 611/9 613/18 614/19 614/24 agent's [1] 615/12 agents [3] 704/11 704/16 704/18 ago [2] 604/2 673/23 agree [5] 604/10 604/22 607/18 678/21 705/10 agreement [1] 667/12 aid [1] 631/16 al [2] 600/16 677/17 Alex [3] 636/6 636/12 637/4 all [80] 611/7 611/20 612/8 617/11 617/12 618/1 618/7 621/4 622/25 626/11 627/6 627/18 628/6 628/9 628/18 630/5 633/8 633/24 635/7 635/24 638/12 639/1 640/21 641/13 642/20 643/8 645/6 645/9 647/3 647/8 647/20 648/9 649/8 649/20 650/2 650/4 651/25 652/19 652/22 652/25 653/5 654/12 654/24 655/4 655/9 656/20 657/10</p>	<p>660/10 660/23 661/8 662/12 663/15 663/19 666/3 666/23 667/4 668/15 669/1 669/10 670/21 674/6 676/22 677/6 680/2 681/18 681/19 681/22 682/15 686/19 703/4 705/2 706/11 708/16 711/14 716/15 717/3 717/19 all's [1] 690/16 allegation [3] 684/4 684/7 684/9 alleges [1] 618/4 allow [5] 604/24 685/21 691/15 694/15 715/21 allowed [8] 603/10 606/3 606/11 607/10 610/7 610/11 611/12 691/4 allows [1] 691/5 along [4] 617/6 644/24 649/5 649/14 already [6] 607/15 619/1 621/2 667/20 682/12 709/22 also [16] 610/24 615/1 627/1 631/6 640/23 641/25 659/6 659/8 660/20 661/10 665/21 666/20 676/8 679/16 694/5 713/10 always [2] 614/13 687/14 am [10] 614/17 618/9 625/20 643/20 644/23 694/15 706/24 707/6 707/7 713/25 AMANDA [2] 600/10 602/9 amended [1] 639/10 Amendment [1] 609/10 AMERICA [2] 600/2 602/4 American [1] 624/16 Americans [1] 635/8 Amerling [63] 603/21 604/13 605/4 614/23 617/6 620/18 620/20 621/4 621/20 624/3 626/3 628/2 628/14</p>	<p>633/24 636/3 637/6 638/7 641/13 641/22 642/20 643/13 647/4 647/20 649/2 651/4 651/25 652/8 655/9 657/15 658/10 659/15 660/10 661/3 661/18 662/13 663/19 664/15 665/16 667/8 669/13 670/9 670/24 672/6 673/3 673/21 674/10 676/5 676/22 677/11 679/9 680/2 681/2 681/22 682/20 683/25 684/2 702/25 703/7 711/18 718/1 Amerling's [2] 604/3 615/11 among [7] 631/23 636/10 640/13 654/9 694/25 695/16 708/9 announced [1] 655/13 another [9] 603/24 621/20 649/22 665/7 668/21 671/9 672/23 675/15 707/24 answer [6] 607/24 610/12 621/13 639/19 689/24 694/18 answered [6] 688/2 693/23 694/13 694/17 715/19 716/3 any [61] 610/14 610/18 628/19 630/14 630/16 630/16 631/15 631/16 632/4 634/1 634/21 636/4 636/5 636/22 637/7 637/9 638/7 638/9 638/16 648/3 649/14 656/16 656/16 658/5 659/25 660/16 661/5 664/23 667/24 668/2 668/4 672/9 672/17 672/19 673/12 674/13 674/19 675/4 675/20 677/22 678/11 678/14 678/18 679/11 680/19 682/4 683/17 689/15 690/2 690/3 694/24 695/22 695/23 702/4 702/9 711/23 712/8 714/4 716/14 716/15 716/24</p>	<p>anybody [2] 647/1 695/23 anyone [5] 609/24 610/8 620/9 633/25 646/25 anything [11] 608/5 608/14 637/2 648/8 650/14 670/2 670/3 683/16 683/20 702/16 715/7 apologize [2] 610/23 666/12 apparent [1] 659/20 apparently [1] 718/8 appear [12] 621/13 623/9 623/14 661/25 671/2 671/16 673/15 683/1 693/10 693/21 694/21 694/23 appearance [1] 661/21 APPEARANCES [1] 600/9 appeared [2] 668/16 700/22 appearing [2] 661/11 670/19 appears [4] 659/21 712/20 713/7 713/14 applicable [1] 629/1 application [1] 667/13 applications [2] 628/23 629/5 apply [1] 709/12 approach [1] 707/1 appropriate [6] 605/4 605/12 615/22 695/1 695/18 702/3 approve [1] 674/3 April [1] 629/1 are [88] 603/8 603/11 605/3 605/7 606/3 606/11 608/4 608/25 609/23 609/24 610/6 610/6 612/23 613/7 614/18 617/12 617/23 619/13 619/16 619/24 619/24 620/5 620/10 620/14 621/5 625/22 625/25 627/1 627/5 627/11 627/12 628/17 629/1 629/12 634/10 634/10 636/22 638/23 639/6 640/3 640/6 642/24 644/13 648/21</p>

A

are... [44] 648/21
650/4 654/17 655/5
655/16 655/16 656/14
663/8 664/10 668/1
668/3 674/12 676/11
680/2 680/4 680/17
681/4 685/7 686/3
690/19 691/1 691/4
691/8 691/9 691/9
692/4 692/7 692/16
700/16 702/7 702/21
705/9 708/20 709/7
711/12 711/21 712/6
713/24 714/23 716/10
716/15 716/24 717/17
718/19

area [3] 630/22 690/22
713/6

areas [3] 640/3 715/24
716/16

aren't [2] 664/5 692/7

argue [1] 612/23

argument [2] 602/21
617/20

arguments [4] 603/2
604/21 604/22 670/3

around [2] 603/3 690/2

arrived [1] 693/4

artful [1] 618/1

article [1] 713/19

articulate [1] 604/6

articulated [1] 619/1

as [93] 602/21 603/17
603/17 603/18 604/13
604/14 605/4 606/20
608/18 608/23 608/23
612/16 613/7 615/3
615/13 615/16 615/22
615/22 616/13 616/20
616/22 617/12 617/17
618/5 618/6 619/22
619/25 620/3 620/4
622/10 625/16 625/16
626/6 627/1 627/6
628/7 629/8 629/19
630/15 630/16 635/16
638/19 639/5 639/15
640/16 649/14 649/15
649/15 653/18 655/16
658/1 659/5 661/12
662/16 662/19 663/2
663/2 664/2 664/2
665/3 665/25 666/18

667/11 667/12 667/16
670/25 671/1 671/5
671/6 672/8 672/15
673/5 673/8 675/11
679/23 680/13 682/24
685/11 694/11 695/6
695/15 695/18 700/25
702/21 702/23 702/23
705/4 706/10 707/10
713/11 716/1 716/14
718/9

ask [37] 603/12 604/6
604/16 604/17 605/16
606/3 606/11 607/3
607/10 608/4 608/21
610/7 610/11 610/18
610/25 611/12 612/2
612/6 612/9 612/10
612/17 613/3 613/4
614/13 614/15 620/12
620/13 625/13 636/8
636/24 646/16 648/11
678/6 679/9 706/2
712/19 718/10

asked [9] 603/10
604/20 607/1 607/17
613/24 644/9 687/23
687/25 715/19

asking [14] 605/23
608/20 619/10 674/19
682/7 690/1 702/9
705/15 714/4 714/22
715/7 715/8 715/16
716/22

asks [3] 633/12 633/24
637/7

aspect [1] 688/6

assert [2] 655/13
660/2

asserted [2] 670/2
673/14

asserting [3] 655/23
667/21 685/1

assertion [4] 661/6
672/17 672/19 680/19

assertions [1] 625/22

assess [1] 677/19

assistant [1] 631/17

associates [1] 634/13

assume [1] 712/4

attached [13] 628/16
644/21 645/3 645/5
645/6 648/21 652/9
652/17 652/18 672/16

690/24 691/16 692/29

attaching [2] 644/23
676/13

attachments [1]
708/11

attack [21] 623/21
624/4 626/12 630/23
631/4 631/7 633/6
633/8 634/20 635/1
635/5 635/13 635/15
635/17 636/10 636/14
637/17 639/22 644/20
671/5 684/5

attacks [1] 640/13

attempt [2] 604/10
664/2

attempting [1] 604/25

attend [1] 635/9

attended [1] 631/6

attending [1] 631/19

attention [1] 709/2

attorney [17] 600/15
631/16 637/23 637/23
641/2 641/5 642/9
642/15 642/23 646/10
652/23 654/10 658/14
674/5 680/5 703/19
708/2

attorney-client [1]
654/10

attorneys [2] 600/11
688/10

attorneys' [1] 614/12

authorities [1] 623/1

authority [9] 612/16
617/23 622/3 645/22
694/2 694/3 694/4
695/4 709/8

authorization [1]
702/12

authorize [1] 644/14

authorized [9] 623/4
639/12 645/25 646/2
647/22 648/7 687/21
693/15 703/1

authorizing [1] 656/17

available [2] 611/21
683/8

Avenue [1] 600/22

avenues [1] 701/17

aware [4] 663/14
713/21 713/24 713/25

B

back [11] 618/15
619/16 657/11 664/10
694/11 700/16 708/5
711/12 715/11 717/15
717/23

ballpark [4] 686/7
686/8 686/14 686/23

Baltimore [1] 600/19

Bankruptcy [1] 600/22

BANNON [95] 600/5
602/5 602/15 604/10
604/21 609/12 614/21
616/7 616/11 616/14
616/22 617/7 622/19
625/19 628/17 629/7
632/1 632/9 632/15
633/2 633/5 636/8
641/18 642/9 643/22
643/25 644/5 644/7
644/14 644/21 645/25
646/12 646/25 652/9
653/6 653/8 653/12
653/13 653/21 656/25
658/4 659/22 659/24
661/6 663/3 667/2
667/15 667/16 669/25
670/1 671/2 671/15
672/12 672/13 673/11
673/14 674/12 674/22
674/24 675/3 677/14
680/5 680/16 681/7
682/1 683/5 683/12
684/5 684/9 688/15
693/10 693/14 693/21
694/20 694/22 700/21
701/1 701/10 703/19
708/2 708/6 708/16
708/17 708/18 712/16
713/7 713/15 713/19
714/4 714/25 715/9
715/25 716/13 716/15
716/24

Bannon's [14] 641/5
642/23 645/16 646/5
657/8 660/4 661/21
662/15 665/12 672/8
673/4 681/14 682/25
683/2

Barenblatt [2] 604/2
612/5

Barr [1] 637/24

barred [3] 617/5 617/9
617/12

B

based [8] 609/7
634/11 646/6 646/16
646/19 655/21 658/22
678/22

basically [2] 620/6
714/3

basis [15] 604/6
604/16 606/5 607/3
614/13 614/14 655/22
656/21 657/1 660/4
660/13 660/16 683/2
683/6 717/1

be [87] 603/6 603/9
603/10 603/22 603/24
604/3 604/22 605/1
605/4 605/12 607/10
607/18 608/2 608/9
608/20 608/22 608/24
609/6 610/1 611/21
613/8 613/17 613/18
613/24 615/2 615/6
615/17 615/20 616/3
616/14 616/20 617/6
618/17 627/16 629/13
637/11 638/16 638/16
639/10 640/1 643/6
644/9 647/4 649/11
649/12 649/14 649/15
651/22 654/16 654/25
658/7 659/6 662/14
664/1 666/5 666/13
667/15 667/19 668/24
670/5 671/21 672/20
673/18 676/19 678/1
678/7 680/22 682/7
683/5 690/15 693/5
705/11 707/1 708/24
709/17 713/7 713/24
714/18 715/11 715/14
715/15 716/8 716/10
716/23 717/14 717/15
718/12

bear [1] 608/5

because [25] 603/5
603/9 603/19 607/16
609/18 610/12 612/13
612/20 614/3 615/2
615/5 617/2 617/9
618/12 619/1 620/14
643/24 648/12 679/1
683/2 701/10 701/14
705/10 707/6 715/3

become [2] 604/24

615/14

been [54] 609/7
613/25 614/3 614/4
616/5 617/2 617/19
617/25 618/8 626/6
626/14 631/5 631/9
631/24 632/1 632/14
632/15 633/7 634/13
634/14 635/18 635/21
636/12 636/14 637/14
637/22 638/13 638/14
640/22 640/22 645/25
646/2 648/6 650/1
650/5 657/23 668/6
671/10 674/14 675/12
677/14 685/18 686/3
686/4 686/10 686/17
688/17 689/24 706/5
706/6 709/18 712/4
714/10 714/12

before [25] 600/8
603/7 607/9 609/2
626/11 633/8 646/5
654/21 662/4 664/15
666/18 671/3 672/13
675/5 679/9 679/12
680/13 684/8 686/24
688/17 704/6 704/20
705/5 706/5 707/18

begin [2] 664/20
664/24

beginning [4] 602/7
637/24 681/23 682/23

begins [2] 603/7 653/5

behalf [17] 602/14
622/7 622/14 644/11
644/15 646/5 652/9
653/6 653/7 653/9
658/23 658/23 658/25
670/13 670/13 670/15
677/14

behave [1] 620/3

being [9] 605/17 607/1
609/20 609/24 617/20
619/19 625/23 626/7
693/22

belief [2] 631/5 635/18

believe [19] 606/5
610/6 614/14 618/6
624/22 625/2 627/14
632/12 646/14 650/23
665/22 672/19 685/22
686/7 688/19 700/21
703/3 716/3 717/24

believed [6] 616/16
626/4 626/24 646/21
668/23 701/14

believes [2] 671/17
674/12

belong [2] 655/12
660/3

below [1] 628/25

Bennie [8] 607/4
622/16 644/25 657/16
658/21 670/11 677/16
693/17

best [8] 613/9 686/23
689/13 695/9 701/2
701/5 701/9 701/18

between [13] 624/11
631/11 632/4 636/18
638/23 642/22 648/5
648/7 651/15 665/5
684/17 714/24 715/17

bias [22] 603/13
603/16 603/18 604/3
604/8 604/14 604/25
605/19 607/14 607/18
607/19 607/21 608/4
608/16 609/4 610/7
610/8 610/24 611/25
612/20 613/7 615/17

biased [8] 604/11
607/22 608/20 608/23
612/11 612/19 613/4
613/5

biases [1] 606/24

bit [1] 669/1

block [2] 626/8 626/18

board [1] 614/13

Bob [1] 708/1

body [9] 604/4 606/21
608/23 615/3 615/3
615/3 652/25 677/8
681/20

boilerplate [1] 715/8

book [2] 713/2 713/10

boost [1] 640/10

bore [1] 702/5

Boris [2] 634/4 634/12

both [10] 603/5 608/18
617/4 627/9 634/15
670/18 671/16 676/3
681/2 693/18

bottom [8] 624/19
641/19 643/9 652/2
652/3 652/5 655/1
702/25

bounds [2] 608/7
612/20

box [2] 641/19 690/23

Boys [3] 636/5 636/11
637/3

branch [1] 656/15

breach [1] 630/20

break [9] 603/7 619/22
619/23 627/6 633/9
663/24 664/15 717/6
717/7

brief [2] 680/10 718/4

briefed [2] 603/17
657/23

briefing [2] 654/21
666/1

briefly [1] 623/10

bring [18] 603/4 619/5
619/7 619/9 619/13
621/1 642/16 648/24
651/1 655/5 657/12
664/8 665/13 669/10
674/7 676/1 679/6
679/23

brought [1] 663/3

building [2] 688/25
692/24

C

calendar [1] 628/24

call [5] 608/19 644/3
644/6 646/7 664/4

called [1] 639/4

came [1] 718/7

campaign [7] 628/22
628/23 629/4 629/4
629/6 629/11 632/8

campaign-related [1]
629/11

campaigns [1] 629/9

can [85] 603/12 604/10
604/17 605/8 609/23
610/1 610/12 610/13
610/25 612/6 612/8
612/9 612/10 612/17
613/9 616/4 617/4
618/15 621/6 621/12
621/24 623/10 623/17
624/18 625/8 629/5
631/12 631/20 632/24
637/18 638/10 639/1
639/11 641/10 644/2
644/17 646/16 647/7
647/7 649/9 649/23

C	Case 1:21-cr-00670-GJN Document 178-1	File 12/31/22 Page 127 of 149	654/14
<p>can... [44] 654/3 654/13 654/16 655/6 655/9 659/17 660/6 660/10 660/24 661/3 661/14 661/18 662/9 662/12 662/21 665/13 667/8 671/13 672/3 672/6 672/25 673/10 674/3 674/6 674/10 674/18 675/7 677/11 680/24 681/3 682/22 690/15 691/6 691/12 695/25 701/2 701/23 705/7 705/19 706/14 706/16 706/21 708/24 714/17</p> <p>can't [8] 607/5 608/2 616/18 647/13 703/3 705/22 712/5 715/13</p> <p>cannot [4] 604/17 649/11 701/24 712/9</p> <p>capacity [1] 663/4</p> <p>Capitol [17] 624/24 630/12 630/20 630/24 631/4 631/7 631/10 631/25 634/20 635/1 636/11 639/22 640/12 644/20 671/5 684/5 684/10</p> <p>carbon [1] 716/11</p> <p>care [1] 622/19</p> <p>carefully [2] 608/15 718/6</p> <p>CARL [1] 600/8</p> <p>case [17] 602/4 602/25 603/1 604/17 604/22 605/17 607/17 608/15 609/13 615/15 616/6 618/20 660/17 684/4 684/8 684/12 704/10</p> <p>cases [1] 606/8</p> <p>cast [1] 624/16</p> <p>categories [10] 629/15 629/17 629/19 629/21 630/2 640/21 714/5 714/23 714/24 716/13</p> <p>category [2] 612/6 630/9</p> <p>caused [1] 702/18</p> <p>causes [3] 623/20 634/25 638/21</p> <p>cellular [1] 628/21</p> <p>certain [6] 615/6</p>	<p>649/15 650/8 654/17 703/3 712/22</p> <p>certainly [3] 602/24 608/4 610/13</p> <p>certification [5] 626/9 626/18 630/13 649/25 671/10</p> <p>certify [2] 624/16 720/4</p> <p>chain [3] 642/22 643/12 645/10</p> <p>Chair [3] 692/17 693/8 712/2</p> <p>Chair's [1] 694/9</p> <p>Chairman [31] 609/16 609/18 610/10 610/11 610/15 610/17 612/14 612/15 622/16 622/16 644/24 656/25 657/16 658/20 658/21 659/16 670/10 670/11 670/13 693/9 693/16 693/17 694/1 694/4 694/6 702/18 703/1 703/2 708/14 711/23 712/7</p> <p>Chairman Bennie [1] 693/17</p> <p>Chairman Thompson [13] 609/16 609/18 610/10 610/11 610/15 610/17 612/14 670/13 693/9 703/2 708/14 711/23 712/7</p> <p>Chairman Thompson's [1] 659/16</p> <p>Chairman's [1] 657/8</p> <p>change [3] 637/15 637/18 638/3</p> <p>changed [1] 637/25</p> <p>changes [2] 639/9 667/17</p> <p>characterized [1] 606/20</p> <p>charge [1] 638/5</p> <p>charged [2] 634/24 634/24</p> <p>charges [1] 663/1</p> <p>Charles [1] 600/18</p> <p>check [3] 644/11 686/21 689/22</p> <p>checked [1] 690/23</p> <p>checking [1] 644/14</p> <p>Chief [1] 622/11</p>	<p>choice [2] 617/22 618/1</p> <p>choose [1] 619/25</p> <p>circumstances [5] 623/20 634/25 635/13 638/20 639/22</p> <p>circus [3] 603/1 608/10 615/15</p> <p>cite [1] 660/16</p> <p>cited [5] 640/8 640/17 713/4 713/11 713/17</p> <p>citizen [1] 632/10</p> <p>citizens [1] 638/12</p> <p>civil [2] 659/7 663/2</p> <p>claim [6] 603/12 603/13 631/8 654/16 656/23 667/14</p> <p>claimed [1] 605/23</p> <p>claiming [1] 668/6</p> <p>claims [6] 631/24 633/7 634/14 636/13 637/22 638/5</p> <p>clarify [1] 656/10</p> <p>Clark [2] 653/18 654/2</p> <p>clear [10] 603/18 605/6 605/10 612/9 615/19 618/18 655/11 663/13 667/19 716/23</p> <p>clearly [3] 608/13 612/4 617/7</p> <p>Clerk [1] 692/17</p> <p>client [4] 644/11 645/22 654/10 660/14</p> <p>client's [1] 644/10</p> <p>clocks [1] 664/5</p> <p>close [1] 664/2</p> <p>CNN [1] 713/19</p> <p>Code [2] 663/6 673/20</p> <p>Cohen [2] 634/5 634/15</p> <p>Cohen-Watnick [2] 634/5 634/15</p> <p>collect [2] 648/12 678/14</p> <p>collecting [1] 664/24</p> <p>College [2] 671/7 671/9</p> <p>COLUMBIA [2] 600/1 677/16</p> <p>combine [1] 686/6</p> <p>come [8] 602/6 603/5 605/21 633/17 665/2 678/19 713/2 717/23</p> <p>comes [2] 606/7</p>	<p>654/14</p> <p>coming [2] 620/14 690/16</p> <p>committed [5] 606/9 611/20 614/1 614/3 690/25</p> <p>committee [195] Committee's [30] 625/19 625/24 627/11 631/2 631/22 632/6 632/9 633/4 634/23 635/5 635/11 635/12 637/19 638/17 656/1 656/6 656/8 663/13 663/21 664/18 668/5 672/15 674/16 675/3 677/25 683/7 683/11 684/3 685/24 702/12</p> <p>committees [2] 623/23 639/7</p> <p>communicated [5] 633/25 653/13 658/4 672/17 708/1</p> <p>communicating [1] 627/2</p> <p>communication [10] 632/2 632/15 636/4 640/12 646/11 646/14 646/22 650/19 665/7 669/25</p> <p>communications [17] 628/18 628/20 629/3 630/16 631/15 631/21 632/13 634/4 634/22 635/7 637/7 637/11 638/8 638/15 654/9 654/17 713/7</p> <p>compelling [2] 623/7 623/11</p> <p>compiling [1] 639/24</p> <p>complete [3] 638/20 672/9 682/2</p> <p>completed [1] 650/2</p> <p>completeness [1] 613/11</p> <p>completing [1] 609/2</p> <p>completion [1] 649/24</p> <p>compliance [6] 647/25 649/10 649/12 649/13 654/15 682/1</p> <p>complied [3] 618/23 673/8 683/19</p> <p>comply [30] 612/3 616/7 616/17 616/18</p>

<p>C</p> <p>comply... [26] 616/22 617/22 618/3 623/16 648/19 649/18 655/20 656/7 656/9 656/23 657/2 659/2 659/3 659/5 659/25 660/5 660/21 662/6 664/18 666/25 671/18 672/9 675/16 675/21 683/3 694/2</p> <p>complying [7] 616/16 616/19 617/9 617/10 659/10 660/20 668/5</p> <p>comports [1] 616/13</p> <p>compounded [1] 673/14</p> <p>computer [6] 664/5 690/17 692/9 692/14 692/17 705/11</p> <p>computers [2] 628/21 692/11</p> <p>concerned [2] 604/4 715/13</p> <p>concluded [3] 656/21 700/15 711/11</p> <p>conduct [2] 630/15 640/19</p> <p>conducted [1] 686/11</p> <p>conducting [3] 622/4 687/6 687/9</p> <p>conducts [1] 639/8</p> <p>confidential [1] 654/17</p> <p>confirm [2] 644/1 644/11</p> <p>confirmed [4] 643/21 644/4 645/22 647/22</p> <p>confirming [1] 648/6</p> <p>confrontation [2] 609/11 617/2</p> <p>confused [2] 675/11 675/15</p> <p>confusion [1] 677/23</p> <p>Congress [25] 606/15 606/20 609/15 615/6 617/24 624/15 626/8 626/20 637/8 639/12 640/4 662/24 667/24 668/1 671/11 671/24 673/19 674/3 683/6 685/7 689/15 695/23 709/8 709/10 709/19</p> <p>Congress' [1] 603/14</p>	<p>congressional [5] 654/14 654/15 656/11 656/14 709/3</p> <p>Congressman [1] 677/13</p> <p>connection [2] 631/11 632/4</p> <p>consider [7] 639/12 662/23 668/25 673/19 674/2 675/5 681/6</p> <p>consideration [3] 656/1 674/16 678/21</p> <p>considerations [1] 702/1</p> <p>considered [4] 611/20 674/22 679/1 679/12</p> <p>considering [1] 666/20</p> <p>consistent [1] 604/18</p> <p>constituted [1] 674/23</p> <p>constitutes [1] 671/19</p> <p>Constitution [1] 600/22</p> <p>contact [1] 628/23</p> <p>contain [1] 650/3</p> <p>contained [6] 642/21 651/5 676/8 679/20 680/3 683/7</p> <p>contempt [18] 603/15 603/25 606/22 659/6 662/20 662/24 663/10 671/24 673/19 673/23 674/4 678/22 679/2 679/14 681/6 682/22 683/5 683/13</p> <p>content [4] 609/19 631/18 653/2 657/4</p> <p>contents [1] 688/13</p> <p>contest [1] 634/2</p> <p>context [2] 611/4 631/18</p> <p>continue [6] 628/6 653/22 655/1 672/10 687/19 687/21</p> <p>continued [2] 620/18 683/3</p> <p>contribute [1] 714/11</p> <p>control [3] 628/19 650/3 706/17</p> <p>convenient [1] 717/7</p> <p>conversation [3] 619/25 643/21 643/22</p> <p>cooperated [1] 685/23</p> <p>cooperation [1] 686/2</p>	<p>coordinated [1] 624/9</p> <p>copies [1] 716/11</p> <p>copy [7] 645/1 651/7 651/14 683/7 691/24 706/25 709/18</p> <p>CORCORAN [12] 600/17 601/4 602/14 607/14 612/1 613/13 613/23 614/21 669/20 680/11 683/23 718/7</p> <p>correct [69] 623/5 624/14 625/4 626/22 628/5 640/25 641/24 642/4 645/8 649/19 650/10 652/24 656/12 657/19 663/7 666/11 667/22 671/12 672/2 673/9 673/25 681/17 682/14 685/9 687/4 687/5 687/7 687/8 687/10 687/11 687/13 687/20 689/2 689/10 692/24 692/25 694/8 700/23 703/7 703/8 703/13 703/16 703/17 703/20 703/21 703/25 704/1 704/4 704/5 704/7 704/8 705/8 707/6 708/3 708/4 708/7 708/8 709/4 709/5 709/9 709/10 709/11 709/13 709/14 712/17 712/18 714/7 716/16 720/4</p> <p>corrective [2] 623/24 640/1</p> <p>correspondence [4] 650/25 651/15 651/16 682/25</p> <p>Costello [38] 616/15 617/8 641/2 641/6 641/8 642/10 642/14 642/23 643/16 643/24 644/2 645/16 645/20 646/1 646/6 646/8 646/14 646/22 647/22 648/6 649/6 650/25 651/8 651/15 652/6 652/7 653/10 657/9 657/17 659/17 665/20 669/25 676/6 676/9 677/3 703/19 708/1 708/5</p> <p>Costello's [1] 655/10</p>	<p>could [47] 612/5 619/5 621/1 622/22 627/23 628/11 628/14 630/6 632/4 632/20 633/21 635/25 640/1 640/4 640/14 642/16 645/11 648/24 649/18 650/3 651/1 651/13 652/2 652/20 657/12 662/25 663/24 667/4 669/10 670/22 670/24 672/24 676/1 676/2 676/23 677/8 679/6 679/23 681/19 681/22 682/17 690/12 690/13 701/15 704/23 711/14 718/12</p> <p>couldn't [1] 610/4</p> <p>counsel [19] 602/6 602/10 605/23 608/1 608/8 616/23 617/8 620/7 622/11 622/19 645/17 650/1 650/20 653/18 655/13 657/9 665/12 668/19 705/7</p> <p>count [10] 605/24 606/23 615/1 615/4 634/3 634/6 634/8 640/16 671/6 671/8</p> <p>country's [1] 663/8</p> <p>couple [4] 632/18 635/24 660/18 663/15</p> <p>course [1] 616/6</p> <p>court [15] 600/1 600/21 603/2 604/1 605/8 612/5 642/17 654/11 667/12 667/18 677/15 684/18 718/10 718/12 720/3</p> <p>Court's [6] 605/11 609/5 609/19 647/6 709/22 718/5</p> <p>courtroom [9] 613/6 619/15 619/21 619/24 620/4 620/7 664/9 717/21 718/1</p> <p>courts [2] 600/22 668/1</p> <p>cover [4] 607/6 614/5 629/21 640/24</p> <p>CR [1] 600/3</p> <p>CRC [1] 600/21</p> <p>create [1] 715/23</p> <p>created [1] 647/16</p> <p>credibility [2] 608/5</p>
--	---	--	---

C

credibility... [1] 608/7
crime [7] 611/11
 611/19 613/25 614/3
 614/8 614/10 615/7
crimes [1] 640/19
criminal [18] 602/4
 623/16 640/18 659/6
 662/20 663/1 663/10
 668/25 671/23 673/23
 674/4 674/23 675/2
 678/22 679/14 681/6
 682/22 683/13
cross [16] 601/4 605/1
 607/6 607/22 607/25
 608/2 609/7 609/23
 612/20 613/8 614/19
 615/12 616/4 616/21
 683/25 717/7
cross-examination [11] 601/4 607/6
 607/22 607/25 608/2
 609/7 609/23 612/20
 614/19 616/21 683/25
cross-examining [1]
 605/1
crossing [1] 610/1
culprit [1] 611/6
custody [2] 628/19
 650/2

D

D'Amico [1] 602/11
D.C [5] 600/11 626/13
 630/12 633/17 688/21
date [38] 628/25
 642/11 642/12 642/13
 643/17 649/11 649/13
 649/15 658/10 661/24
 662/3 662/4 665/1
 665/3 665/5 665/6
 666/18 675/17 685/18
 688/18 688/20 693/1
 693/2 693/4 693/5
 693/14 693/21 695/6
 695/7 695/18 700/20
 700/21 700/25 702/5
 702/20 703/22 711/22
 720/9
dated [2] 665/11
 666/17
dates [7] 629/1 642/24
 647/5 647/12 663/16
 668/12 702/3

DAVID [3] 600/14
 600/15 602/14
day [24] 600/7 621/7
 626/9 626/11 633/7
 638/24 640/19 645/14
 645/20 646/5 650/22
 658/13 663/21 666/18
 668/9 671/11 681/4
 681/15 688/14 688/16
 689/16 689/23 690/7
 708/5
days [3] 662/4 675/17
 675/18
DC [3] 600/4 600/12
 600/23
dcd.uscourts.gov [1]
 600/23
deadline [20] 621/10
 623/14 623/15 648/20
 649/18 650/17 650/20
 652/13 652/15 663/20
 670/18 670/19 673/5
 701/22 702/4 702/8
 702/9 702/14 702/17
 702/20
deadlines [4] 606/17
 670/16 678/7 701/19
Dear [2] 652/8 677/13
December [2] 627/2
 637/24
decide [3] 607/1 620/2
 679/13
decided [11] 607/15
 616/11 616/12 617/3
 682/21 693/5 693/9
 693/20 694/12 694/20
 694/22
deciding [2] 613/19
 617/20
decision [9] 611/19
 617/23 660/14 679/17
 688/1 693/7 693/22
 695/2 695/8
decision-maker [1]
 693/7
decision-making [1]
 611/19
decisions [1] 613/25
declaration [1] 616/15
defend [1] 654/11
defendant [107] 600/6
 600/14 602/15 603/3
 603/7 603/12 603/14
 603/23 604/25 605/11

605/15 606/16 606/23
 607/9 611/5 613/3
 614/5 617/20 618/3
 620/24 621/7 621/12
 621/22 622/1 622/12
 622/21 625/2 625/5
 625/12 626/4 626/24
 627/14 627/21 628/4
 629/16 629/20 630/10
 632/7 634/21 635/20
 636/23 639/13 641/2
 646/9 646/15 646/23
 647/23 648/1 648/3
 648/9 648/17 648/19
 649/18 650/6 650/11
 650/18 650/19 653/10
 653/24 655/19 656/6
 657/5 657/7 659/2
 659/8 660/19 660/21
 661/10 662/5 662/18
 663/12 663/14 664/17
 664/18 664/20 664/22
 665/2 665/8 666/24
 667/20 668/4 668/9
 668/15 668/17 668/20
 669/4 669/14 675/14
 675/19 677/21 678/1
 678/3 678/6 678/10
 678/13 678/17 679/3
 679/11 679/13 679/16
 682/7 682/12 682/22
 683/9 683/17 683/18
 688/2
defendant's [12]
 602/21 631/20 638/15
 642/15 647/25 652/23
 656/23 658/14 663/20
 666/19 671/20 674/20
Defendants [1] 606/3
defending [1] 634/19
defense [9] 605/23
 617/5 618/14 618/20
 618/23 634/16 634/19
 640/11 704/25
defenses [1] 617/12
defiance [2] 606/17
 660/13
defied [1] 606/17
definitely [1] 647/14
Definitions [2] 628/17
 649/3
degrees [1] 638/13
delay [5] 634/2 678/4
 678/21 682/1 682/5

delayed [1] 678/1
deliberate [2] 617/22
 619/22
deliberations [2]
 674/17 679/2
deliberative [1] 654/9
deliver [1] 691/7
delivered [3] 647/21
 691/8 691/9
delivery [1] 647/24
demand [1] 694/2
demanded [1] 671/1
demands [1] 636/4
democratic [1] 624/7
demonstrating [5]
 625/18 658/2 669/24
 680/14 680/19
denied [2] 618/12
 682/5
depart [2] 691/1 718/1
Department [7] 634/16
 634/19 637/16 637/19
 637/21 638/4 663/1
depend [1] 607/25
depicted [1] 692/13
deposition [29]
 621/13 621/15 623/9
 623/15 627/9 640/24
 645/1 661/11 661/22
 662/4 665/1 665/3
 665/6 666/18 668/10
 670/20 671/4 671/17
 673/16 678/19 683/1
 684/18 684/23 685/2
 685/5 708/15 708/16
 708/18 709/7
depositions [4] 686/6
 686/10 687/10 709/13
Deputy [1] 622/10
describe [3] 639/1
 644/2 651/13
described [8] 627/1
 635/16 639/15 680/13
 695/6 707/25 708/9
 714/11
deserve [1] 654/18
designated [1] 661/21
despite [2] 650/17
 659/23
detailed [1] 683/6
determine [2] 608/16
 646/24
determining [1]
 638/18

D	Case 1:21-cr-00670-CJN Document 178	Filed 12/31/22 Page 130 of 149	
<p>devices [1] 628/21 did [120] 602/24 606/12 606/12 606/21 607/17 610/10 610/11 612/18 613/18 613/20 613/20 614/11 618/3 618/24 622/11 622/13 629/15 629/18 629/24 630/1 630/2 630/4 630/25 632/11 633/3 637/2 637/2 641/2 641/20 641/21 642/1 642/5 642/7 642/8 644/6 646/2 648/2 648/4 648/8 648/11 648/13 648/14 648/14 648/16 649/20 649/21 650/11 650/13 650/14 650/17 650/18 650/22 650/24 653/10 656/16 656/21 657/7 659/11 660/20 660/22 661/10 662/5 662/8 664/19 664/21 664/22 664/25 665/2 665/4 665/7 665/10 665/19 666/2 667/21 667/23 667/25 668/4 668/7 668/9 668/11 668/16 669/6 675/14 675/19 677/25 678/6 678/9 678/10 678/12 678/21 678/24 679/3 679/12 679/16 683/16 688/4 688/4 688/9 688/9 688/14 693/1 695/5 695/7 695/9 695/9 703/1 703/3 703/22 703/23 704/18 705/25 706/4 707/10 707/11 707/17 711/18 711/23 712/7 715/23 715/23 didn't [18] 606/7 606/9 611/13 611/13 611/13 614/6 614/7 615/6 615/8 616/7 616/8 616/22 648/17 683/20 689/3 693/25 707/13 716/5 difference [1] 684/22 different [14] 613/21 636/18 638/13 638/23 640/3 666/12 691/7</p>	<p>691/11 693/19 702/1 714/3 714/5 714/16 714/20 diligent [1] 650/1 direct [12] 601/4 614/23 615/20 620/18 694/6 700/24 701/3 701/3 705/9 705/23 712/14 712/21 directed [4] 631/9 631/25 648/19 705/12 directing [3] 693/13 705/21 706/13 direction [3] 655/15 660/13 664/18 directly [2] 647/2 694/17 Director [1] 622/10 disclose [1] 659/22 disclosure [1] 654/8 discuss [2] 691/7 707/13 discussed [5] 622/19 644/8 644/8 673/7 707/8 discussing [3] 626/15 702/1 707/23 discussion [12] 609/17 654/21 694/24 695/5 695/11 695/15 695/16 695/17 695/23 696/3 707/22 709/25 discussions [1] 701/24 DISTRICT [5] 600/1 600/1 600/8 600/22 677/15 do [45] 604/17 606/12 606/18 609/8 610/1 610/11 612/8 615/14 618/4 618/6 618/15 618/19 618/24 619/8 637/1 643/17 643/19 649/3 650/8 664/1 664/2 668/17 684/3 684/6 684/10 684/12 684/19 684/20 688/4 688/5 691/5 694/20 694/21 695/22 700/24 701/3 704/10 705/13 712/7 712/22 716/7 716/19 716/23 718/14 718/16 document [28] 621/10</p>	<p>621/20 621/25 622/12 628/2 642/21 642/21 643/13 644/25 649/2 649/2 651/5 651/9 652/3 652/13 652/15 663/20 666/3 666/5 671/16 679/20 688/8 691/20 691/24 705/16 705/18 706/12 706/15 documented [1] 641/8 documents [61] 621/8 623/7 623/14 627/9 628/18 628/20 629/3 629/12 629/15 629/19 630/10 638/25 639/2 639/4 640/21 644/22 648/2 648/12 648/15 648/17 650/2 650/3 650/4 650/9 655/17 655/20 661/7 661/8 664/20 664/24 667/2 667/15 668/16 670/19 671/2 672/13 673/5 673/12 678/11 678/15 683/1 687/13 687/15 687/17 691/4 691/6 691/14 691/18 693/10 693/14 693/22 694/23 695/7 695/18 701/16 714/5 716/12 716/15 716/19 716/20 716/24 does [22] 603/16 606/14 625/1 628/6 628/8 636/25 641/7 641/9 645/20 654/25 655/3 659/1 659/8 660/4 660/16 661/13 674/1 691/3 691/14 705/3 707/9 713/1 doesn't [5] 604/2 605/17 619/2 694/7 716/5 doing [3] 612/19 692/9 715/4 don't [30] 607/2 607/18 609/5 609/6 610/18 612/4 616/3 617/3 666/4 675/24 688/16 690/10 693/3 695/14 704/21 705/13 706/7 707/7 707/20 707/21 707/23 711/22 712/13 715/2 715/3 715/4 716/14 716/20</p>	<p>717/13 718/14 Donald [5] 630/13 653/19 659/21 677/16 713/8 done [7] 608/10 609/14 610/1 646/13 646/21 650/8 692/16 door [2] 604/1 618/7 down [1] 701/17 dozens [3] 686/15 686/16 687/1 draft [5] 711/18 711/23 712/8 715/23 716/4 drafted [2] 711/19 714/9 drafting [4] 685/16 688/11 714/11 714/17 drafts [2] 711/25 712/10 drawn [1] 605/1 Dunn [31] 602/11 621/1 622/22 624/18 627/23 628/11 630/6 632/20 633/21 635/25 641/10 642/16 643/10 645/11 648/24 651/1 652/20 653/1 655/5 659/13 660/6 660/24 661/14 662/9 672/3 674/6 676/23 679/22 680/24 681/20 682/17 Dunn-Gordon [1] 602/11 during [2] 626/7 650/4</p> <hr/> <p>E</p> <p>e.g [2] 628/21 628/23 each [6] 629/19 630/2 657/22 692/2 714/20 716/11 earlier [8] 623/3 626/20 635/16 639/7 648/1 666/19 673/8 713/22 easel [4] 647/9 647/13 647/15 647/16 Eastman [1] 638/8 effect [1] 604/20 effort [6] 602/25 607/7 626/8 636/8 638/3 675/3 efforts [6] 627/4 634/1 635/4 635/8 637/14 638/13</p>

E	Case 1:21-cr-00679-GJN Document 178 Filed 12/31/22 Page 121 of 149	702/17	645/6 648/25 651/2
<p>eight [4] 705/16 706/12 706/14 706/16 eight-page [3] 705/16 706/12 706/14 either [3] 606/6 608/23 615/20 elaborate [1] 716/4 elected [1] 624/10 election [20] 624/9 624/17 626/9 626/19 630/14 631/5 631/8 631/24 633/7 634/2 634/14 635/8 635/18 635/23 636/14 637/23 638/1 638/6 638/14 671/11 electoral [5] 634/3 634/6 640/16 671/7 671/9 electors [1] 634/8 electronic [2] 639/5 693/11 elements [4] 606/25 613/16 614/7 614/10 eliciting [1] 609/11 Ellis [1] 638/9 else [10] 606/9 608/22 609/4 613/5 620/12 620/13 641/4 646/25 647/1 695/23 email [34] 628/23 642/9 642/10 642/22 643/9 643/12 643/13 643/20 644/13 644/17 644/24 645/9 645/12 645/14 645/15 645/16 646/1 646/7 648/5 649/6 651/15 651/16 652/3 652/5 652/7 652/11 652/17 676/8 676/9 676/11 676/13 677/2 691/9 703/19 emailed [9] 641/5 642/13 650/25 657/8 657/18 665/20 665/21 669/8 703/18 emails [5] 629/12 639/5 642/14 642/24 647/24 encourage [1] 633/17 end [5] 610/4 687/20 687/22 702/13 702/17 ends [3] 627/8 642/25</p>	<p>enforce [1] 663/3 enforcement [3] 606/4 606/11 607/3 engage [1] 691/12 engaged [1] 634/13 enough [1] 647/10 ensure [1] 675/3 enter [1] 664/9 entered [1] 619/15 entire [1] 622/11 entirely [1] 615/2 entities [2] 624/1 638/24 entitled [4] 677/16 713/2 713/10 720/5 entries [1] 628/24 enumerated [1] 655/14 envision [1] 609/6 Epshteyn [2] 634/4 634/12 especially [2] 670/2 705/10 essential [1] 682/2 essentially [3] 619/23 620/2 715/8 EST [1] 674/15 establish [1] 618/16 Establishing [1] 663/13 estimate [1] 686/23 estimating [1] 685/22 et [1] 677/16 etc [2] 628/22 628/24 evaluate [3] 613/24 623/22 639/25 evaluating [1] 611/18 EVAN [2] 600/17 602/14 Evan Corcoran [1] 602/14 even [6] 603/9 605/8 607/2 613/7 615/19 620/12 event [1] 644/23 events [20] 624/2 624/14 624/24 626/16 629/23 631/11 632/3 632/5 632/17 633/11 633/17 636/19 637/4 638/11 638/21 638/24 639/25 640/8 654/6 701/11</p>	<p>eventually [1] 650/18 ever [3] 648/11 648/14 678/6 everyone [6] 602/16 619/18 620/12 620/13 647/15 717/15 everything [1] 657/23 evidence [18] 601/9 601/9 601/10 601/10 601/11 606/6 606/19 608/14 611/21 614/11 615/7 618/11 621/2 690/12 690/14 704/25 708/21 711/16 ex [1] 672/10 ex-President [1] 672/10 exact [1] 675/23 exactly [2] 614/4 688/5 examination [18] 601/4 601/4 607/6 607/22 607/25 608/2 609/7 609/23 610/2 612/20 614/19 616/21 620/18 623/25 683/25 712/14 712/21 718/9 examining [1] 605/1 example [3] 613/14 625/21 648/11 examples [7] 630/5 632/18 633/19 639/6 640/7 640/9 640/10 excerpt [3] 653/24 654/4 654/24 exclude [1] 603/2 excluded [2] 618/8 618/12 exculpatory [6] 606/5 606/13 606/14 607/5 611/21 614/11 excuse [3] 656/23 667/21 717/24 excused [2] 661/11 717/17 executive [14] 617/9 654/8 655/12 655/14 655/15 655/24 660/3 660/15 667/13 667/14 672/11 682/9 682/11 683/18 exhibit [78] 601/8 621/2 621/18 627/24 641/11 642/17 643/3 643/5 643/7 645/4</p>	<p>645/6 648/25 651/2 651/4 651/6 651/10 651/13 651/19 651/21 651/23 652/1 652/16 657/13 657/15 657/21 658/1 661/15 665/14 665/16 665/24 666/7 666/9 666/11 666/13 667/5 669/11 669/18 669/21 670/4 670/6 672/25 676/2 676/5 676/8 676/14 676/16 676/18 676/20 679/7 679/19 679/21 680/3 680/8 680/12 680/18 680/21 685/13 687/24 688/8 689/5 689/9 689/12 690/13 692/1 692/14 700/19 703/2 703/5 704/24 704/25 707/4 708/10 708/21 708/23 709/6 711/15 714/2 714/15 Exhibit 2 [1] 621/18 exhibits [1] 658/2 exist [1] 682/4 existed [1] 675/9 exited [1] 717/21 expect [1] 605/2 expected [1] 639/3 expects [1] 661/20 expedites [1] 706/25 expeditious [1] 701/20 expeditiously [2] 701/14 702/23 experience [3] 646/17 646/20 650/6 explain [14] 621/24 623/10 629/5 631/20 632/24 637/18 638/10 639/11 654/13 674/18 675/7 681/3 681/16 682/8 explained [2] 672/15 682/24 explaining [1] 657/1 explains [1] 626/23 explanation [3] 649/13 675/20 683/17 explicitly [1] 605/14 expressed [1] 611/15 extended [1] 678/8 extension [1] 648/11 extensively [1] 603/17</p>

E	F	G	
<p>extent [10] 608/21 608/25 609/22 610/25 615/11 618/10 629/9 631/10 649/12 667/13 extremely [1] 681/25 Ezra [2] 634/5 634/15</p>	<p>692/15 703/8 704/6 704/19 705/5 706/4 707/18 filling [2] 692/8 692/8 finalization [1] 640/15 finalize [1] 626/21 finally [4] 627/5 638/7 661/20 662/5 financing [1] 630/15 find [6] 603/3 608/5 614/3 648/12 652/8 683/5 findings [1] 683/11 fine [3] 605/1 620/1 707/1 finish [3] 614/22 614/23 662/21 finished [1] 664/16 first [34] 603/7 603/9 605/8 622/23 625/11 626/3 630/7 630/9 634/6 643/12 643/20 654/3 658/10 658/19 659/12 659/15 661/3 661/18 662/12 662/13 667/6 667/8 667/9 670/22 679/23 681/9 681/11 682/18 688/14 690/20 691/22 692/1 705/17 707/15 firsthand [4] 694/21 694/21 716/14 716/23 flat [1] 682/25 floor [2] 600/18 611/15 Flynn [1] 638/9 focus [3] 627/4 692/4 709/2 focused [2] 624/13 638/18 follow [6] 606/7 606/9 609/10 648/19 649/20 650/11 follow-up [1] 609/10 followed [2] 618/23 691/17 following [3] 628/25 643/20 683/8 follows [1] 661/13 force [1] 662/23 forced [1] 702/20 foregoing [4] 636/5 637/9 638/10 720/4 foresee [1] 603/11 form [5] 690/4 691/23</p>	<p>formal [2] 632/7 686/6 formally [1] 672/18 former [11] 624/12 631/21 631/23 632/7 632/13 632/16 654/25 659/21 667/23 672/16 672/20 forth [3] 623/1 623/8 673/20 forum [2] 604/23 615/15 forward [1] 602/6 found [1] 650/8 fourth [1] 714/1 Frank [1] 602/11 fraud [3] 637/23 637/25 638/6 free [3] 619/24 620/2 620/2 fresh [1] 692/2 Friday [1] 645/15 front [2] 620/6 684/18 full [7] 649/11 649/13 649/15 660/7 667/6 667/9 672/25 fully [3] 616/16 661/22 700/16 fully-public [1] 700/16 fundamental [1] 654/11 funding [1] 640/11 further [4] 673/14 682/1 683/17 683/21 future [1] 640/2</p>	<p>610/13 613/7 650/14 665/10 715/5 gets [2] 605/9 668/8 getting [2] 609/1 669/3 Giuliani [1] 638/8 give [4] 686/14 689/24 706/24 715/3 given [5] 605/6 640/9 675/12 694/25 716/1 gives [2] 622/5 692/21 go [26] 604/2 609/6 612/10 613/3 613/14 616/21 618/15 621/17 625/1 627/23 633/21 641/10 648/25 649/8 660/24 661/14 667/4 672/24 675/24 696/1 701/17 706/21 708/11 709/24 711/14 715/11 goes [5] 603/15 606/24 609/3 612/20 655/7 going [32] 603/5 603/6 605/21 608/8 608/14 609/3 613/24 614/17 615/20 615/21 619/13 627/6 633/9 633/11 647/4 647/11 655/19 663/16 663/23 666/24 667/2 674/24 679/11 685/21 687/19 693/5 694/15 716/9 716/10 717/6 717/10 718/8 good [17] 602/3 602/8 602/12 602/13 602/16 604/6 604/15 606/5 607/2 614/13 614/14 616/1 619/11 619/12 619/18 620/20 620/21 good-faith [1] 604/15 Gordon [31] 602/11 621/1 622/22 624/18 627/23 628/11 630/6 632/20 633/21 635/25 641/10 642/16 643/10 645/11 648/24 651/1 652/20 653/1 655/5 659/13 660/6 660/24 661/14 662/9 672/3 674/6 676/23 679/22 680/24 681/20 682/17 got [9] 606/16 607/21 616/8 616/11 618/21 646/1 648/5 693/19</p>

G	Case 1:21-cr-00670-GJN Document 178	Filed 12/31/22 Page 133 of 149	
<p>got... [1] 708/5 govern [2] 640/15 709/8 governing [2] 702/15 702/24 government [25] 602/7 602/17 602/20 603/1 604/20 605/12 605/20 608/1 608/19 614/5 616/5 616/10 618/4 619/2 643/2 651/18 656/13 656/16 657/20 665/23 666/11 666/13 669/17 676/15 680/7 government's [59] 614/20 621/2 621/18 627/24 641/11 642/17 643/3 643/5 643/7 648/25 651/2 651/4 651/5 651/10 651/12 651/19 651/21 651/23 652/1 657/13 657/15 657/21 665/14 665/16 665/24 666/7 666/9 667/5 669/11 669/18 669/21 670/4 670/6 672/24 676/2 676/5 676/16 676/18 676/20 679/7 679/19 679/21 680/3 680/8 685/12 687/23 689/5 689/9 689/12 690/13 692/1 692/13 700/19 703/2 703/5 708/23 711/15 714/2 714/15 granted [1] 603/2 great [1] 663/25 greeting [1] 622/25 grounds [2] 630/12 682/4 group [3] 620/3 630/16 717/11 groups [1] 636/9 guess [1] 690/1 GULLAND [1] 600/11</p>	<p>631/6 631/8 631/8 631/24 632/1 632/7 632/14 632/15 633/5 633/7 633/8 633/10 634/11 634/13 634/14 634/21 634/21 635/18 636/9 636/12 636/14 636/23 637/4 637/14 637/22 637/24 638/13 638/14 638/16 639/3 643/24 644/7 645/22 646/2 646/4 646/4 646/10 646/13 646/13 648/6 650/20 652/15 653/13 654/21 656/3 656/7 656/23 657/1 659/17 660/21 664/15 666/2 667/19 668/6 669/6 669/8 670/16 670/20 673/7 673/8 674/21 675/3 675/6 675/12 675/15 675/20 677/21 678/13 678/16 678/17 681/7 681/16 682/12 682/13 682/21 683/10 683/13 683/18 685/11 701/11 704/15 705/5 706/5 706/5 707/18 714/4 714/4 hadn't [2] 617/19 645/7 half [3] 606/2 652/3 653/2 hand [1] 707/2 Handed [1] 707/4 handles [1] 646/19 handwritten [1] 641/19 happen [1] 662/6 happened [3] 611/16 638/19 681/16 happening [3] 640/2 671/11 702/10 happens [1] 716/17 happy [5] 690/9 706/8 706/24 707/22 715/11 hard [2] 691/23 706/25 has [39] 603/17 607/18 608/19 613/17 613/18 614/3 614/4 615/17 617/2 618/17 618/19 619/2 624/16 624/22 636/8 640/5 650/1 655/13 660/15 660/19</p>	<p>661/6 668/15 671/15 672/16 673/11 673/12 673/14 683/4 694/1 694/3 694/4 694/13 694/16 695/3 709/18 716/15 716/18 716/24 718/13 have [96] 603/17 604/15 606/4 606/7 606/8 606/15 606/20 607/2 607/5 608/15 609/25 612/5 612/17 613/1 613/4 613/21 614/13 614/13 614/14 614/14 615/16 615/16 617/4 617/18 617/21 617/25 618/7 618/22 619/25 620/4 624/22 625/3 625/6 625/8 626/6 627/14 629/7 629/8 629/20 632/11 632/12 633/10 634/22 635/14 635/20 635/21 636/23 637/4 637/25 640/7 640/8 640/9 640/17 645/24 646/21 646/24 647/1 647/14 648/15 648/17 650/5 656/16 674/14 675/14 677/14 679/11 683/1 685/18 685/23 686/3 686/4 686/10 686/12 686/17 686/21 688/16 689/22 689/24 694/21 695/25 700/22 700/24 701/3 701/25 712/4 713/12 713/13 714/10 714/12 716/9 716/14 716/19 716/20 716/23 717/1 717/23 haven't [3] 607/4 619/2 650/8 having [1] 663/2 he [116] 603/12 605/15 606/16 607/5 607/10 612/17 612/19 613/23 616/8 616/11 616/12 616/16 616/16 616/18 616/18 616/22 616/23 617/3 617/3 617/8 617/8 618/4 618/5 620/10 625/6 626/4 626/24 632/3 632/12 633/10 634/13 635/22</p>	<p>636/8 636/24 637/1 637/2 637/2 637/13 638/16 643/25 644/4 644/4 644/10 644/11 644/11 644/14 645/22 645/22 645/24 646/1 646/2 646/4 646/10 646/10 646/11 646/25 647/22 648/4 648/6 648/11 648/12 648/13 648/14 648/14 648/16 648/19 649/20 649/21 650/13 650/22 653/9 653/9 653/12 653/13 653/14 655/12 655/23 656/23 657/1 659/3 659/6 660/21 661/10 662/6 664/21 664/23 664/25 665/4 666/24 667/1 667/21 667/25 668/6 668/7 668/11 668/23 673/8 673/12 673/16 675/11 675/11 675/15 675/20 676/13 678/9 678/12 678/14 678/16 678/18 679/11 683/13 683/17 683/18 694/1 694/3 714/4 he's [5] 609/22 612/18 616/11 616/12 617/21 hear [10] 605/17 608/14 609/16 610/20 610/23 648/8 683/16 683/20 689/3 707/14 heard [2] 613/13 613/23 hearings [1] 687/7 hell [2] 627/6 633/8 help [2] 640/13 691/11 helping [2] 633/17 634/13 helps [1] 716/21 her [22] 604/14 604/16 604/16 604/17 608/4 608/5 610/11 610/24 612/11 613/4 613/7 615/12 625/10 646/16 705/9 705/15 705/16 705/17 705/18 705/23 706/24 707/2 here [29] 603/13 605/2 605/10 606/18 608/18 612/14 612/18 613/4 613/16 619/19 620/7</p>
<p>H had [100] 611/14 612/16 613/21 613/25 620/24 621/5 625/2 625/12 626/4 626/14 626/24 629/22 631/5</p>			

H	Case 1:21-cr-00670-GJM Document 178	Filed 12/31/22 Page 134 of 149	
<p>here... [18] 625/22 627/12 630/3 634/10 647/5 684/8 684/18 685/22 692/19 695/22 700/25 702/15 704/13 707/21 712/5 714/23 715/14 718/13 here's [2] 613/2 614/17 hereby [2] 623/6 628/18 heretofore [1] 618/7 herman [4] 600/21 600/23 720/3 720/9 high [1] 634/16 high-ranking [1] 634/16 him [26] 603/15 612/3 616/18 617/9 625/9 627/3 636/24 637/11 642/13 644/6 644/9 646/2 647/2 655/25 659/3 660/3 661/25 667/20 667/21 668/18 668/24 683/10 683/20 701/13 703/4 715/15 himself [2] 612/18 682/8 his [57] 606/17 616/17 616/23 617/2 617/21 621/8 621/13 621/14 621/15 622/19 627/4 632/8 634/13 636/13 638/1 641/2 642/10 644/10 644/11 644/15 644/21 645/22 646/10 650/20 650/25 655/13 655/13 655/15 655/15 655/22 658/23 659/2 659/5 659/9 660/14 660/19 661/11 662/4 662/18 662/22 663/3 667/17 668/10 668/18 671/16 673/11 673/15 674/13 674/22 675/5 675/10 675/16 677/23 678/5 679/2 680/5 713/15 hold [3] 610/22 654/19 717/10 honor [59] 602/3 602/8 602/13 602/19 605/5 607/23 611/23 612/1</p>	<p>616/25 617/14 617/17 618/18 619/4 619/8 619/12 619/16 620/17 625/13 626/1 643/2 643/4 647/11 647/13 651/18 651/20 655/15 657/20 657/22 658/8 660/14 663/25 664/10 664/13 665/23 666/4 666/8 666/15 669/17 669/19 670/7 676/15 676/17 680/7 680/10 680/23 683/21 683/24 689/17 694/13 695/25 701/8 704/24 705/7 706/24 707/12 717/5 717/25 718/3 718/18 HONORABLE [1] 600/8 hotel [5] 626/7 626/12 626/13 626/13 713/1 House [20] 604/4 611/15 615/3 623/1 623/2 623/2 623/23 624/15 630/22 632/8 632/15 637/13 652/10 663/1 683/4 688/25 690/8 692/18 692/24 709/19 housekeeping [1] 619/20 how [27] 612/4 623/25 629/15 629/18 630/25 631/20 633/3 634/21 634/22 635/10 637/10 638/15 646/19 650/24 657/7 665/19 675/13 676/11 685/17 686/2 686/10 686/17 686/20 686/23 693/4 707/25 717/9 however [1] 620/3 human [5] 693/19 693/20 693/22 701/22 701/22 husher [3] 611/8 696/1 711/12</p>	<p>611/12 614/17 615/23 616/2 618/21 647/11 663/16 685/21 685/22 689/3 690/1 690/9 691/25 693/23 693/23 702/7 702/9 705/18 705/20 706/8 707/22 714/22 715/7 715/16 716/22 717/7 717/10 I've [7] 607/15 618/1 669/22 680/13 693/19 703/4 716/3 idea [1] 605/21 identical [1] 716/11 identification [1] 704/24 identified [5] 607/4 626/6 661/9 690/24 692/20 identify [3] 609/8 623/22 629/18 identifying [1] 673/13 ignore [1] 614/11 illegitimate [1] 612/24 immaterial [1] 679/2 immediately [2] 630/23 631/6 impact [1] 677/19 impede [1] 634/3 implications [1] 605/7 importance [1] 718/5 important [3] 624/23 638/22 681/25 improper [1] 604/21 improperly [1] 615/5 improve [1] 640/12 inaccurately [1] 603/19 inappropriate [5] 604/23 605/9 608/24 614/1 659/24 include [5] 640/10 640/14 640/17 641/7 716/7 included [2] 621/21 639/4 includes [2] 620/6 623/25 including [15] 609/15 628/19 630/14 631/15 632/16 633/8 634/3 634/18 635/13 654/6 654/8 663/11 701/19 701/25 714/12</p>	<p>incoming [1] 624/9 increases [1] 640/18 incumbent [1] 624/8 indicate [1] 664/23 indicated [1] 712/14 indicates [2] 660/12 708/15 indication [2] 678/14 678/16 individual [9] 603/13 603/18 608/23 625/8 692/15 695/3 714/19 716/10 716/10 individual's [1] 629/13 individualized [2] 692/4 692/7 individuals [18] 623/25 626/15 631/3 631/6 634/22 635/16 636/18 636/23 638/5 638/10 638/12 638/16 638/23 640/7 650/7 685/23 691/18 695/14 influence [1] 634/3 influenced [1] 635/15 inform [7] 644/6 648/14 659/8 679/3 679/16 701/16 716/21 informal [1] 686/6 informally [1] 672/18 information [51] 606/8 606/13 606/14 607/5 609/12 613/18 622/5 624/22 625/3 625/7 625/9 626/5 626/25 627/14 629/10 629/20 632/11 635/3 635/4 635/21 636/4 636/9 636/16 639/13 641/19 641/20 654/7 655/25 659/23 659/25 663/17 668/13 672/22 674/19 675/4 675/8 675/10 675/14 678/5 683/14 685/24 687/15 691/10 692/13 692/15 701/13 701/14 702/23 703/15 714/18 716/8 informed [5] 624/24 674/21 679/10 682/12 708/6 informing [3] 625/5 660/19 683/9 informs [2] 622/2</p>
	<p>I I'd [3] 621/17 686/21 693/23 I'll [5] 610/20 615/13 618/14 715/20 717/6 I'm [29] 610/10 611/10</p>		

informs... [1] 635/4
inject [1] 607/7
inquiry [4] 623/25
627/11 684/3 690/25
inside [4] 620/5 620/9
620/9 620/13
instance [1] 611/15
instead [1] 612/23
instruction [8] 608/6
625/14 649/8 649/9
659/21 659/23 669/22
680/22
instructions [6]
628/17 645/1 648/21
649/3 675/11 691/9
intelligence [1] 640/12
intend [1] 615/14
intended [4] 627/16
631/18 640/23 704/3
intention [5] 608/10
655/13 660/2 672/11
718/9
interactions [1] 717/4
interest [4] 701/13
701/19 702/22 713/9
interfere [1] 671/6
interference [2] 635/1
639/23
interrupt [1] 701/6
interview [3] 611/13
614/6 707/8
interviewed [9] 605/25
607/3 611/11 611/20
685/18 686/3 686/4
704/9 705/4
interviewing [1] 687/4
interviews [1] 686/7
introduce [1] 602/6
introduced [1] 609/20
introductory [1] 628/9
invalid [1] 694/7
investigate [2] 634/18
644/19
investigated [1] 615/7
investigating [5]
611/11 613/19 623/19
634/25 639/21
investigation [27]
605/22 606/1 611/2
611/10 612/8 613/10
613/11 613/17 622/4
624/5 625/3 627/15
629/8 630/3 631/2

631/22 639/4 634/23
635/11 635/12 637/20
638/17 640/5 681/23
681/24 715/4 716/21
investigations [1]
639/8
investigative [1] 606/4
investigator's [1]
611/19
investigators [3]
606/6 606/8 614/11
investigators' [1]
613/25
invitation [1] 678/4
invocation [2] 655/15
660/15
invoke [1] 672/11
invoking [4] 662/24
673/19 674/2 678/22
involve [2] 716/5
716/6
involved [20] 609/24
626/15 630/17 633/16
637/14 638/13 638/24
656/1 657/3 666/20
669/2 684/5 684/9
685/15 686/18 686/24
688/1 701/25 714/13
716/6
involvement [3] 621/8
621/14 658/22
involves [4] 609/11
624/8 684/12 714/18
irrelevant [8] 606/23
606/25 612/6 614/10
615/4 616/7 616/9
617/4
is [357]
isn't [2] 684/22 686/2
issuance [2] 688/1
688/3
issue [16] 602/17
607/10 609/8 610/12
616/3 624/12 648/22
675/15 682/11 707/21
707/23 707/24 713/5
713/14 717/22 718/11
issued [9] 607/15
620/24 646/5 656/3
656/14 656/25 688/17
692/2 702/21
issues [6] 618/7
623/21 655/16 671/4
674/13 674/20

issuing [2] 612/2
644/21
it [202]
it's [31] 603/5 611/3
611/17 611/18 612/9
615/7 615/12 615/19
615/19 616/9 616/13
618/12 619/1 638/22
639/23 662/20 664/5
670/1 674/18 674/19
686/2 686/12 688/25
690/13 690/16 694/7
708/24 709/6 716/4
717/11 718/3
item [13] 631/12
631/13 633/12 635/6
635/20 636/3 636/25
637/6 637/7 638/7
649/22 649/22 649/23
items [8] 628/3 628/25
629/19 633/22 636/1
716/8 716/20 716/21
its [16] 623/23 625/3
640/5 647/24 656/22
669/24 674/17 675/6
677/19 678/21 682/2
686/11 687/19 687/21
688/12 708/10
itself [5] 612/24
627/20 677/7 689/6
691/22

J
January [43] 621/9
621/14 623/20 624/2
624/4 624/14 624/24
626/7 626/10 626/11
626/16 627/4 627/6
629/23 630/11 630/17
631/2 631/15 631/19
632/3 632/17 633/6
633/11 633/18 634/9
635/1 635/9 636/20
637/5 637/17 638/11
638/19 639/22 640/8
644/20 654/6 671/5
701/11 713/15 713/16
713/21 713/22 713/24
January 5th [1] 626/11
January 6 [7] 624/2
624/14 631/15 631/19
638/19 671/5 713/24
January 6th [31] 621/9
621/14 623/20 624/4

624/24 626/10 626/16
627/4 629/23 630/11
630/17 631/2 632/3
632/17 633/6 633/11
633/18 634/9 635/1
635/9 636/20 637/5
637/17 638/11 639/22
640/8 644/20 654/6
701/11 713/16 713/21
Jenna [1] 638/9
John [1] 638/8
joint [3] 624/15 626/20
634/9
Jones [3] 636/6
636/12 637/4
judge [4] 600/8 618/22
684/24 685/4
judges [1] 685/7
July [3] 600/5 718/6
720/9
Jurors [1] 664/9
jury [44] 600/7 602/18
602/24 605/16 605/17
606/19 607/1 608/6
611/17 611/18 613/24
614/2 615/5 616/10
617/2 619/6 619/13
619/15 620/4 620/7
621/24 625/17 639/1
639/11 643/6 649/23
651/22 654/13 655/10
657/21 658/7 664/8
666/6 666/14 670/5
674/18 676/19 680/13
680/22 684/8 690/15
708/24 709/16 717/21
jury's [1] 607/11
just [74] 604/9 604/11
606/11 606/24 610/3
612/1 614/15 616/2
618/16 619/1 619/13
619/20 621/4 621/6
621/24 623/10 630/6
635/24 639/1 641/14
642/17 645/3 647/7
647/11 651/2 651/13
652/17 654/13 654/20
656/10 656/13 657/12
658/17 661/3 662/12
663/8 663/15 664/15
666/8 669/13 670/25
671/9 673/7 673/22
674/21 675/7 675/24
676/1 676/23 677/14

J	K	L	M
<p>just... [24] 679/6 679/10 679/23 681/3 681/22 682/17 688/8 690/18 690/20 692/14 693/18 695/6 702/9 702/12 707/12 709/2 712/19 716/4 716/5 716/5 716/22 717/6 718/3 718/10 Justice [5] 637/16 637/19 637/22 638/4 663/1 justification [1] 672/8 Justin [1] 653/18</p>	<p>691/19 695/1 712/8 715/12 715/14 last [13] 602/20 655/7 660/7 660/25 661/4 661/15 662/8 672/25 674/8 674/10 681/23 708/21 715/21 late [1] 677/17 later [1] 650/22 latest [1] 677/18 law [21] 600/15 606/2 606/4 606/11 607/3 616/12 616/12 616/16 616/19 616/19 617/3 617/21 618/5 618/23 618/24 618/24 660/16 660/17 671/19 671/21 674/23 lawfully [1] 672/21 laws [4] 623/24 640/15 663/8 673/21 lawsuit [3] 677/15 679/1 682/9 lawyer [1] 616/17 lay [2] 602/23 602/24 lead [1] 701/15 leadership [3] 637/15 637/18 638/4 leading [7] 624/1 632/2 632/17 633/6 635/13 636/14 637/16 learned [2] 623/22 718/4 least [4] 608/18 612/14 616/20 694/16 leave [4] 680/24 691/1 691/4 691/15 led [2] 624/23 632/12 left [4] 620/22 681/9 681/11 681/13 legal [4] 660/4 660/17 683/2 717/22 legislate [1] 640/4 legislation [1] 639/9 legislative [1] 656/15 Lesley [4] 619/5 664/8 664/12 717/23 lesson [1] 718/4 lessons [1] 623/22 let [6] 604/9 618/18 693/25 707/14 707/24 717/6 let's [36] 607/14 610/10 610/22 611/24</p>	<p>613/10 622/26 629/14 630/5 631/12 632/18 633/19 642/14 645/9 647/25 648/23 649/8 649/22 651/25 652/19 652/25 653/1 657/10 659/12 664/1 664/2 664/4 668/12 669/1 670/21 676/22 677/6 681/12 682/15 690/11 708/20 709/24 letter [136] letters [14] 609/17 612/15 618/15 618/20 669/9 679/20 680/2 680/4 680/15 680/17 680/20 681/2 681/4 712/1 liability [1] 623/16 light [4] 617/25 635/22 675/10 677/17 like [21] 602/18 611/6 618/15 620/3 620/15 620/24 621/17 631/1 640/2 640/13 642/22 647/7 651/7 653/22 669/6 669/8 670/12 675/14 677/22 701/6 713/20 likely [1] 618/2 likes [1] 620/10 limine [2] 603/2 604/19 limited [6] 607/19 608/19 634/4 654/7 659/22 659/23 limiting [3] 625/13 669/22 680/21 line [11] 605/1 608/13 610/2 613/8 613/9 613/22 641/17 644/13 703/9 703/16 718/8 lines [1] 617/7 lingering [1] 617/18 link [2] 683/8 683/11 list [5] 625/1 628/3 629/25 632/19 649/22 listed [4] 627/12 630/2 634/10 642/11 listen [1] 608/15 lists [1] 628/24 litigation [1] 677/20 little [1] 669/1 located [2] 628/20</p>	<p>650/1 log [1] 673/13 long [3] 670/24 675/14 717/9 Longworth [2] 688/25 692/24 look [28] 622/20 627/22 629/14 630/5 632/18 633/19 635/24 642/14 645/9 648/23 649/22 652/25 657/10 672/23 675/24 677/6 682/15 686/12 690/9 690/11 690/22 692/19 706/8 707/22 708/20 714/20 715/11 718/11 looked [2] 647/23 672/1 looking [13] 623/3 627/19 628/10 635/12 635/21 645/3 645/5 652/17 664/16 700/19 705/20 714/14 714/18 looks [3] 642/22 651/7 713/20 loose [2] 627/7 633/9 lorraine [4] 600/21 600/23 720/3 720/9 loses [1] 624/9 love [1] 608/2 lunch [6] 717/14 717/17 717/20 718/10 718/12 718/20</p>
<p>K Kashyap [2] 634/4 634/15 keep [5] 609/8 620/15 647/7 647/8 717/6 Keepers [3] 636/6 636/11 637/3 kind [4] 639/2 639/9 702/9 717/11 kinds [4] 617/11 622/5 639/11 675/7 knew [3] 606/6 636/24 637/1 know [24] 608/1 608/8 609/16 609/18 611/4 611/14 611/17 612/4 613/16 616/14 617/7 637/2 637/2 645/6 670/25 671/1 693/20 694/20 695/22 714/22 715/4 715/14 715/17 717/6 knowing [1] 717/1 knowledge [10] 611/14 633/10 668/5 694/21 694/22 700/24 701/3 701/4 716/14 716/23 known [1] 606/7 knows [3] 606/13 610/11 610/14 KRISTIN [3] 620/18 641/22 683/25</p>	<p>L ladies [2] 625/17 680/12 language [6] 691/13</p>	<p>liability [1] 623/16 light [4] 617/25 635/22 675/10 677/17 like [21] 602/18 611/6 618/15 620/3 620/15 620/24 621/17 631/1 640/2 640/13 642/22 647/7 651/7 653/22 669/6 669/8 670/12 675/14 677/22 701/6 713/20 likely [1] 618/2 likes [1] 620/10 limine [2] 603/2 604/19 limited [6] 607/19 608/19 634/4 654/7 659/22 659/23 limiting [3] 625/13 669/22 680/21 line [11] 605/1 608/13 610/2 613/8 613/9 613/22 641/17 644/13 703/9 703/16 718/8 lines [1] 617/7 lingering [1] 617/18 link [2] 683/8 683/11 list [5] 625/1 628/3 629/25 632/19 649/22 listed [4] 627/12 630/2 634/10 642/11 listen [1] 608/15 lists [1] 628/24 litigation [1] 677/20 little [1] 669/1 located [2] 628/20</p>	<p>M ma'am [3] 619/11 705/2 717/17 made [12] 603/17 605/7 618/1 619/2 633/6 633/8 649/11 649/12 654/16 672/20 693/22 695/3 main [1] 639/6 make [8] 603/8 605/8 618/18 619/20 637/22 638/5 666/8 683/13 maker [1] 693/7 making [7] 604/21 611/19 618/2 635/22 636/13 663/14 702/1 mall [2] 630/12 630/21 Manner [2] 642/5 703/18 many [15] 617/17</p>

M	meet [1] 674/24	681/16 682/7 686/4 694/16	683/5 683/12 693/14 701/1 701/10 703/19 708/2 708/16 708/17 708/18 713/7 713/15 713/19 714/4
many... [14] 629/15 631/3 631/5 635/16 685/17 686/3 686/10 686/12 686/13 686/17 686/20 686/21 686/23 687/1	meeting [6] 626/17 626/20 668/24 673/18 681/5 713/1 member [4] 603/14 606/15 637/12 703/1 members [25] 606/20 606/25 609/15 610/16 610/19 615/6 620/6 626/8 636/9 637/8 640/8 640/17 685/18 688/12 689/15 689/23 690/2 690/3 693/8 694/25 695/17 695/23 702/2 712/1 712/11	Moreover [3] 627/5 660/2 672/19 morning [19] 600/7 602/3 602/8 602/12 602/13 602/15 602/16 603/4 609/7 616/1 619/11 619/12 619/18 619/19 620/20 620/21 648/8 650/12 650/15 most [3] 618/1 714/15 716/8 motion [2] 604/19 618/10 motivated [7] 602/22 607/8 612/3 612/25 631/4 635/14 635/17 motivations [2] 603/13 603/22 motive [1] 603/19 motives [2] 603/14 606/24 move [3] 663/23 706/20 707/24 moved [1] 603/1 moves [7] 643/2 651/18 657/20 665/23 669/17 676/15 680/7 moving [1] 717/8 Mr [7] 601/4 616/1 641/6 646/1 676/9 682/1 688/15 Mr. [131] Mr. Alex [1] 636/12 Mr. Bannon [68] 604/10 604/21 609/12 614/21 616/7 616/11 616/14 616/22 617/7 622/19 625/19 629/7 632/1 632/9 632/15 633/2 633/5 636/8 642/9 643/25 644/5 644/7 644/14 644/21 646/12 646/25 653/8 653/12 653/13 653/21 656/25 658/4 659/22 659/24 661/6 663/3 667/2 667/15 667/16 669/25 670/1 671/2 671/15 672/12 672/13 673/11 673/14 674/12 674/22 674/24 675/3 680/5 680/16 681/7	Mr. Bannon's [14] 641/5 642/23 645/16 646/5 657/8 660/4 661/21 662/15 665/12 672/8 673/4 681/14 682/25 683/2 Mr. Clark [1] 654/2 Mr. Corcoran [9] 607/14 612/1 613/13 613/23 614/21 669/20 680/11 683/23 718/7 Mr. Costello [29] 641/8 642/14 642/23 643/16 643/24 644/2 645/16 645/20 646/6 646/8 646/14 646/22 647/22 648/6 649/6 650/25 651/8 651/15 652/6 652/7 653/10 657/9 657/17 659/17 665/20 669/25 676/6 677/3 708/5 Mr. Costello's [1] 655/10 Mr. Schoen [3] 618/10 618/25 718/2 Mr. Trump [1] 661/6 Mr. Trump's [4] 660/2 660/13 660/14 672/12 Ms [5] 601/4 663/19 664/12 664/12 676/22 Ms. [102] 603/21 604/3 604/13 605/4 607/13 610/20 611/24 614/23 615/11 617/6 617/15 619/5 620/16 620/20 621/1 621/4 621/20 622/22 624/3 624/18 626/3 627/23 628/2 628/11 628/14 630/6 630/9 630/19 632/20 632/23 633/21 633/24 635/25 636/3 637/6 638/7 641/10 641/13 642/16 642/20 643/10 643/13 645/11 647/4 647/20 648/24 649/2 651/1 651/4 651/25 652/8 652/20 653/1
march [4] 631/9 631/25 633/13 633/13 Marshals [1] 703/25 mask [2] 620/8 620/10 masks [3] 619/21 619/24 620/15 matter [4] 653/14 667/18 684/3 720/5 matters [2] 627/10 690/24 MATTHEW [1] 600/17 may [25] 613/3 613/4 613/8 617/25 618/22 620/10 625/16 635/21 636/23 637/4 639/19 643/6 651/22 658/7 660/3 660/3 664/8 666/5 666/13 670/5 676/19 680/22 696/1 707/1 718/1 maybe [1] 705/7 MC [1] 600/19 McCarthy [2] 614/7 614/9 me [24] 604/9 604/18 604/20 614/18 615/19 618/2 618/18 618/24 643/14 650/25 653/22 665/20 690/4 693/25 705/21 706/12 706/13 706/20 707/6 707/14 707/24 716/5 716/6 717/6 mean [11] 604/1 607/15 607/24 619/2 637/1 646/3 653/10 674/1 690/4 691/3 691/14 means [3] 634/1 654/14 691/16 meant [4] 610/23 623/10 629/5 656/2 measures [7] 639/12 640/1 640/6 640/10 640/12 640/14 640/17 media [3] 602/23 636/12 713/23	meet [1] 674/24 meeting [6] 626/17 626/20 668/24 673/18 681/5 713/1 member [4] 603/14 606/15 637/12 703/1 members [25] 606/20 606/25 609/15 610/16 610/19 615/6 620/6 626/8 636/9 637/8 640/8 640/17 685/18 688/12 689/15 689/23 690/2 690/3 693/8 694/25 695/17 695/23 702/2 712/1 712/11 mention [1] 706/11 mentioned [2] 611/4 630/19 messages [1] 639/6 met [2] 614/7 614/10 Michael [1] 638/8 middle [1] 645/12 might [27] 607/5 608/20 608/22 611/21 613/21 625/3 625/6 627/14 629/13 629/20 632/12 633/10 635/14 635/20 659/6 662/6 675/10 677/19 712/16 713/6 713/23 714/18 715/14 715/15 715/24 716/9 718/10 mind [2] 609/9 639/3 minimum [1] 614/22 minute [2] 669/2 673/23 minutes [3] 664/2 664/3 664/6 misconduct [4] 674/22 675/5 675/11 678/5 mistaken [1] 707/6 modifications [1] 640/14 MOLLY [2] 600/11 602/9 moment [1] 705/23 Monday [2] 674/15 677/5 Montgomery [1] 600/16 more [14] 605/17 612/4 633/19 635/24 648/8 648/12 648/18 650/14 663/16 669/1	Mr. [131] Mr. Alex [1] 636/12 Mr. Bannon [68] 604/10 604/21 609/12 614/21 616/7 616/11 616/14 616/22 617/7 622/19 625/19 629/7 632/1 632/9 632/15 633/2 633/5 636/8 642/9 643/25 644/5 644/7 644/14 644/21 646/12 646/25 653/8 653/12 653/13 653/21 656/25 658/4 659/22 659/24 661/6 663/3 667/2 667/15 667/16 669/25 670/1 671/2 671/15 672/12 672/13 673/11 673/14 674/12 674/22 674/24 675/3 680/5 680/16 681/7	Mr. Costello's [1] 655/10 Mr. Schoen [3] 618/10 618/25 718/2 Mr. Trump [1] 661/6 Mr. Trump's [4] 660/2 660/13 660/14 672/12 Ms [5] 601/4 663/19 664/12 664/12 676/22 Ms. [102] 603/21 604/3 604/13 605/4 607/13 610/20 611/24 614/23 615/11 617/6 617/15 619/5 620/16 620/20 621/1 621/4 621/20 622/22 624/3 624/18 626/3 627/23 628/2 628/11 628/14 630/6 630/9 630/19 632/20 632/23 633/21 633/24 635/25 636/3 637/6 638/7 641/10 641/13 642/16 642/20 643/10 643/13 645/11 647/4 647/20 648/24 649/2 651/1 651/4 651/25 652/8 652/20 653/1

M	Ms. Vaughn [9]	Ms. Vaughn [9]	Ms. Vaughn [9]
<p>Ms.... [49] 654/19 655/5 655/9 657/15 658/10 659/13 659/15 660/6 660/10 660/24 661/3 661/14 661/18 662/9 662/13 663/23 664/8 664/15 665/16 667/8 669/13 670/9 670/24 672/3 672/6 673/3 673/21 674/6 674/10 676/5 676/23 677/11 679/9 679/22 680/2 680/24 681/2 681/20 681/22 682/17 682/20 683/22 684/2 702/25 703/7 707/14 711/18 717/23 718/1</p> <p>Ms. Amerling [58] 603/21 604/13 605/4 614/23 617/6 620/20 621/4 621/20 624/3 626/3 628/2 628/14 630/9 630/19 632/23 633/24 636/3 637/6 638/7 641/13 642/20 643/13 647/4 647/20 649/2 651/4 651/25 652/8 655/9 657/15 658/10 659/15 660/10 661/3 661/18 662/13 664/15 665/16 667/8 669/13 670/9 670/24 672/6 673/3 673/21 674/10 676/5 677/11 679/9 680/2 681/2 681/22 682/20 684/2 702/25 703/7 711/18 718/1</p> <p>Ms. Amerling's [2] 604/3 615/11</p> <p>Ms. Dunn-Gordon [30] 621/1 622/22 624/18 627/23 628/11 630/6 632/20 633/21 635/25 641/10 642/16 643/10 645/11 648/24 651/1 652/20 653/1 655/5 659/13 660/6 660/24 661/14 662/9 672/3 674/6 676/23 679/22 680/24 681/20 682/17</p> <p>Ms. Lesley [3] 619/5 664/8 717/23</p>	<p>610/20 611/24 617/15 620/16 654/19 663/23 683/22 707/14 much [1] 612/4 multi [2] 651/5 679/19 multi-page [1] 679/19 multi-paged [1] 651/5 multiple [3] 602/20 627/10 701/10 murder [2] 606/8 611/4 must [1] 655/14 my [33] 607/15 608/23 613/2 619/23 620/1 620/5 620/7 652/8 652/18 655/23 664/5 675/22 685/3 686/2 687/16 687/25 688/4 689/13 689/13 689/19 689/24 689/25 693/13 694/11 695/9 701/2 701/6 701/9 701/18 705/3 707/9 712/6 713/17 myself [7] 642/22 645/19 651/15 652/6 676/10 702/1 714/12 mystery [2] 606/13 611/6</p>	<p>655/7 668/9 668/17 672/4 674/7 706/21 708/5 717/9 NICHOLS [1] 600/8 night [1] 602/21 no [40] 600/3 606/13 610/12 610/22 610/22 610/22 620/5 627/16 628/25 643/4 648/10 650/16 651/20 656/19 660/15 676/17 677/24 678/16 678/20 682/4 683/2 684/4 684/7 684/9 684/24 685/8 687/17 689/5 689/9 689/12 690/6 690/13 703/2 704/25 706/17 708/21 711/15 714/2 714/15 717/1 No. [1] 700/20 No. 2 [1] 700/20 noncompliance [12] 655/22 659/5 662/16 662/18 662/19 662/22 668/23 673/6 673/15 674/13 674/20 677/23 not [118] 603/6 603/16 604/14 604/23 604/24 604/24 605/4 605/8 606/11 606/12 606/21 608/10 608/10 608/22 609/19 609/20 611/7 611/17 612/14 612/18 613/4 614/18 615/12 615/14 615/19 616/9 616/13 616/19 616/20 617/18 617/22 617/25 618/3 618/6 618/9 619/25 620/10 620/12 620/13 625/20 625/20 625/24 634/3 637/25 640/4 646/14 646/22 646/25 648/4 648/13 648/14 648/16 649/13 649/18 649/21 650/13 654/7 655/19 656/8 656/21 656/23 658/4 659/9 659/22 659/25 660/3 660/4 660/16 660/20 661/11 664/21 664/25 665/4 666/2 667/15 667/21 667/25 668/3 668/5 668/7 668/11 668/16 670/1</p>	<p>670/1 672/13 672/17 672/21 673/8 674/14 678/9 678/12 678/24 678/25 679/11 680/17 680/17 680/18 683/19 685/7 689/6 691/1 691/4 691/15 691/17 691/25 693/23 694/17 701/6 702/7 703/4 704/25 705/19 709/17 715/7 715/9 715/16 716/10 717/10 note [2] 614/25 618/14 noted [2] 602/20 667/16 notes [2] 653/21 659/15 nothing [3] 608/13 618/19 683/21 notice [1] 619/20 notified [2] 668/24 678/18 notify [1] 681/7 notifying [1] 667/20 November [1] 704/10 now [36] 605/10 606/20 610/22 612/13 613/10 617/1 619/16 620/4 620/4 627/8 627/22 646/20 664/10 671/13 671/15 673/14 675/25 678/18 680/25 684/16 685/11 687/2 687/23 694/11 702/4 703/24 704/9 705/21 708/9 709/2 709/21 711/18 712/14 714/1 717/3 718/19 Now's [1] 663/25 number [8] 632/14 632/23 633/24 640/3 640/6 685/13 714/11 714/16 numerous [2] 626/14 631/7 NW [2] 600/12 600/22</p>
	<p>N</p> <p>name [2] 703/12 703/13 names [1] 634/10 nation [1] 681/25 nature [1] 631/17 need [9] 604/6 609/25 615/10 639/9 647/14 675/22 690/18 690/20 717/6 needed [3] 648/12 648/18 664/18 needs [1] 705/11 neither [1] 667/2 never [2] 614/2 709/21 new [2] 624/12 717/8 news [1] 602/20 next [25] 624/21 626/9 626/23 627/1 628/7 633/19 633/22 642/2 642/5 644/12 645/9 645/14 645/20 653/15 653/16 653/23 655/2</p>		<p>O</p> <p>o'clock [1] 662/1 Oath [3] 636/5 636/11 637/3 object [2] 654/20 666/4 objected [1] 666/2</p>

O
objection [15] 609/9
617/19 618/17 639/17
643/4 651/20 654/22
676/17 685/20 689/17
695/12 695/24 709/22
715/19 715/20
objectives [1] 630/15
obligated [1] 659/3
obligation [2] 659/2
661/6
obtain [1] 635/4
obtaining [3] 672/21
701/13 702/22
obviously [1] 717/10
occasions [1] 627/3
occur [1] 615/8
occurred [1] 640/19
October [69] 621/11
621/15 623/8 623/9
627/21 648/2 648/8
650/12 650/15 651/8
652/12 653/17 657/16
658/12 659/17 661/11
662/1 664/17 665/2
665/6 665/6 665/11
665/17 665/21 666/18
666/19 666/20 668/9
668/15 668/19 668/24
669/15 670/16 670/18
670/19 671/2 671/3
672/1 672/16 673/5
673/15 673/18 674/16
675/6 675/13 675/19
676/6 677/5 677/21
678/7 678/10 678/13
678/17 680/5 681/3
681/15 683/15 693/1
693/5 693/11 693/21
694/12 694/23 695/6
700/20 700/25 702/5
702/11 702/19
October 14 [3] 671/3
700/20 702/19
October 14th [9]
621/15 623/9 661/11
662/1 665/2 665/6
668/9 673/15 700/25
October 18th [5] 678/7
678/10 678/13 678/17
681/15
October 7 [4] 693/21
694/12 694/23 695/6
October 7th [2] 621/11

659/17
OFC [1] 600/11
off [2] 620/10 620/22
offense [1] 606/9
offered [1] 657/2
office [9] 688/22
688/25 689/14 689/19
689/25 689/25 692/22
692/23 692/24
officer [1] 614/4
offices [3] 689/15
689/21 689/23
Official [2] 600/21
720/3
officials [2] 632/16
634/16
often [1] 691/6
Oh [1] 706/18
Okay [50] 608/17
613/1 613/9 614/16
614/24 615/23 618/13
645/18 660/18 668/8
672/23 679/19 681/12
684/16 685/10 685/17
686/9 686/16 687/2
687/19 687/23 688/14
689/1 689/8 689/11
690/7 691/22 692/12
694/11 695/21 700/19
702/16 704/6 704/12
704/15 704/18 704/22
705/24 706/2 708/20
709/15 709/21 712/19
712/25 713/5 713/14
713/21 714/8 717/3
717/16
once [2] 663/22
717/22
one [44] 603/13
603/20 603/22 603/24
603/24 604/3 604/16
604/24 605/17 606/13
609/8 612/16 613/16
614/4 614/17 614/25
616/2 619/20 620/5
624/14 633/15 634/16
640/14 656/13 677/18
681/5 681/6 681/9
681/9 681/10 681/11
681/12 685/15 690/1
694/16 708/13 709/2
711/19 713/3 713/11
715/21 717/1 717/22
718/4

one week [1] 677/18
ones [1] 669/7
ongoing [2] 632/13
661/6
only [8] 603/18 627/13
658/17 682/6 701/3
705/11 705/17 715/9
opened [2] 616/10
618/7
opening [5] 602/21
605/6 608/11 608/12
618/12
operating [1] 702/13
opportunity [2] 675/4
716/18
opposition [1] 630/13
order [7] 605/11
623/22 638/4 639/8
639/25 667/14 718/6
organizations [2]
633/15 636/19
organizing [1] 630/17
other [51] 603/20
604/16 608/14 609/8
610/17 610/18 614/25
616/3 626/10 627/3
627/10 629/12 632/18
633/9 635/4 635/7
637/8 640/14 640/17
645/7 654/8 656/16
659/7 660/17 667/15
668/4 668/6 669/7
670/12 682/5 683/18
688/10 693/4 701/15
701/16 702/16 702/18
702/21 714/21 714/25
715/5 715/10 715/14
715/17 715/18 715/23
716/1 716/2 716/11
716/20 717/2
others [3] 605/4 629/7
654/9
otherwise [1] 670/4
ought [1] 616/3
our [22] 607/25 608/2
608/10 609/10 609/23
617/22 624/7 643/21
646/11 647/20 655/24
663/16 665/25 665/25
668/12 677/18 680/9
682/24 686/12 686/21
716/21 717/14
out [20] 605/9 608/6
612/20 620/14 639/8

643/24 647/2 690/4
691/24 692/8 692/8
692/15 703/6 703/13
704/6 704/19 705/5
706/4 707/18 718/6
outside [8] 602/18
605/16 607/11 613/6
634/12 702/4 702/7
702/20
outstanding [1]
618/17
over [5] 669/3 679/2
685/23 718/10 718/12
overarching [2]
702/14 702/17
overlap [2] 714/24
715/17
Overruled [3] 639/18
689/18 695/13

P
p.m [13] 643/18
652/12 663/20 674/15
675/19 677/5 677/21
678/6 678/10 678/13
678/17 717/20 718/20
page [67] 601/2 601/8
621/5 621/17 621/20
621/25 622/12 625/16
627/24 628/7 633/20
633/22 641/7 641/10
641/13 641/14 642/20
643/9 648/25 651/12
651/14 652/1 652/19
653/3 655/1 655/7
658/16 660/7 660/25
660/25 661/15 667/5
667/9 672/24 673/1
674/7 676/22 676/24
679/19 679/23 688/7
689/7 689/9 689/11
690/20 691/22 692/1
692/13 703/5 704/2
705/10 705/12 705/16
705/17 705/20 705/21
706/12 706/14 706/21
706/22 706/23 708/21
708/21 709/3 711/15
714/1 714/14
paged [1] 651/5
pages [9] 645/7
652/16 655/6 674/8
676/3 680/24 706/16
706/17 718/11

<p>P Case 1:21-cr-00670-GJN Document 178 Filed 12/31/22 Page 140 of 149</p> <p>paid [1] 631/16</p> <p>paper [2] 639/5 692/10</p> <p>paragraph [43] 623/17 623/18 624/21 625/1 625/21 625/25 627/8 628/9 628/15 654/3 655/7 655/10 659/13 659/18 660/7 660/11 660/25 661/4 661/13 661/16 662/8 662/13 662/21 667/6 667/9 667/9 670/22 670/24 671/14 672/4 672/7 673/1 673/3 673/10 674/8 674/11 675/2 682/23 705/12 709/3 709/15 712/15 712/20</p> <p>paragraphs [3] 622/23 682/18 715/12</p> <p>paralegal [1] 602/10</p> <p>part [19] 609/10 624/7 624/19 629/8 645/5 653/23 656/13 656/16 659/18 668/1 672/23 681/23 685/7 692/14 692/23 714/16 715/3 716/1 716/17</p> <p>partial [1] 649/14</p> <p>participants [2] 631/9 631/25</p> <p>participate [4] 622/11 629/24 695/5 695/7</p> <p>participated [4] 631/3 635/17 636/10 688/10</p> <p>participation [1] 631/14</p> <p>particular [9] 604/10 604/12 607/19 612/10 705/10 705/12 705/12 706/13 716/19</p> <p>particularly [1] 714/19</p> <p>parties [1] 605/2</p> <p>partisan [2] 604/23 615/15</p> <p>partly [1] 620/14</p> <p>parts [2] 660/18 692/7</p> <p>passed [4] 650/20 652/15 670/17 670/20</p> <p>passing [1] 650/17</p> <p>Patel [2] 634/5 634/15</p> <p>peaceful [4] 623/21 624/5 635/2 639/23</p> <p>penalties [2] 640/18</p>	<p>659/7</p> <p>pending [2] 677/20 707/17</p> <p>Pennsylvania [1] 637/13</p> <p>people [9] 602/23 602/24 605/25 613/21 620/1 620/9 620/14 633/17 638/14</p> <p>people's [1] 715/5</p> <p>Percenters [3] 636/6 636/11 637/4</p> <p>Perfect [1] 706/9</p> <p>perhaps [2] 614/23 701/16</p> <p>Peril [3] 713/2 713/10 713/12</p> <p>period [1] 629/1</p> <p>permission [1] 647/6</p> <p>permit [1] 618/11</p> <p>permitted [1] 616/17</p> <p>permitting [2] 630/15 630/25</p> <p>Perry [3] 637/8 637/10 637/12</p> <p>persisted [1] 673/11</p> <p>person [14] 603/24 611/12 611/13 630/16 685/13 691/3 691/6 691/8 691/15 692/8 693/14 694/12 694/22 702/19</p> <p>personal [13] 603/22 628/20 628/21 628/22 628/22 629/4 629/4 629/6 629/12 629/12 629/13 658/23 663/4</p> <p>personally [5] 641/3 669/6 670/13 686/17 688/9</p> <p>persuade [4] 626/8 635/8 637/14 638/14</p> <p>persuasive [2] 606/19 615/7</p> <p>pertain [1] 714/5</p> <p>pertinency [1] 613/15</p> <p>pertinent [5] 612/7 613/17 613/18 613/20 714/19</p> <p>phase [1] 640/5</p> <p>phone [1] 646/7</p> <p>phones [1] 628/21</p> <p>physical [2] 689/19 689/25</p>	<p>pick [3] 620/24 702/19 702/19</p> <p>piece [5] 606/5 606/13 606/14 607/4 692/9</p> <p>place [9] 603/9 611/11 629/23 630/23 633/11 634/9 640/1 661/21 692/21</p> <p>plan [2] 610/18 627/3</p> <p>planning [4] 630/15 630/17 630/25 664/23</p> <p>plans [5] 605/11 605/16 626/15 634/1 671/6</p> <p>platforms [1] 636/13</p> <p>played [2] 629/8 636/19</p> <p>please [48] 602/6 619/5 622/23 623/17 628/14 630/7 631/12 632/21 633/22 641/11 642/18 643/10 644/17 649/9 649/23 651/2 652/8 654/3 655/9 659/13 659/18 660/7 660/10 660/24 661/3 661/8 661/14 661/18 662/9 662/12 662/14 662/21 665/14 667/5 667/8 671/13 672/3 672/6 672/25 672/25 673/10 674/10 674/14 676/3 677/11 681/19 682/22 686/14</p> <p>podcast [5] 632/24 632/25 633/1 633/4 633/5</p> <p>point [12] 610/4 611/25 615/13 615/21 617/13 617/19 618/3 618/9 618/25 619/3 619/3 706/7</p> <p>police [3] 613/9 614/3 615/22</p> <p>policies [1] 623/24</p> <p>political [8] 602/25 603/12 605/18 606/21 606/24 608/9 615/15 615/15</p> <p>politicalize [1] 604/22</p> <p>politically [4] 602/22 607/8 612/3 612/25</p> <p>politically-motivated [1] 602/22</p>	<p>politicizing [1] 607/17</p> <p>politics [5] 603/1 604/5 604/23 607/7 615/16</p> <p>portion [2] 672/9 706/13</p> <p>portions [6] 689/2 689/4 692/16 694/17 708/11 711/21</p> <p>position [18] 614/20 614/21 625/19 625/24 638/2 656/6 656/8 656/22 659/24 660/15 665/25 667/17 667/17 669/19 669/24 679/4 680/9 680/15</p> <p>positions [3] 614/24 658/3 658/4</p> <p>possession [3] 628/19 629/13 650/2</p> <p>possibility [1] 663/2</p> <p>possible [4] 649/12 649/13 664/2 702/23</p> <p>potential [9] 604/7 606/24 610/8 623/15 626/15 631/20 636/17 636/21 713/16</p> <p>potentially [5] 627/3 640/18 654/7 701/11 701/15</p> <p>Powell [1] 638/9</p> <p>power [8] 623/22 624/6 624/8 624/9 624/11 626/21 635/2 639/23</p> <p>practice [2] 691/17 695/21</p> <p>preceded [1] 631/7</p> <p>precedent [1] 660/17</p> <p>preceding [1] 630/23</p> <p>preclude [1] 604/21</p> <p>precluded [1] 615/2</p> <p>prepared [1] 654/11</p> <p>preparing [1] 634/19</p> <p>presence [3] 602/18 605/16 607/12</p> <p>present [11] 602/15 611/14 626/7 629/2 684/24 685/4 690/5 695/11 704/10 704/13 712/12</p> <p>presented [1] 609/25</p> <p>preserve [2] 616/4 667/14</p>
---	---	--	--

P

preserved [2] 618/9
654/22

President [27] 624/8
624/10 624/12 624/12
627/2 630/13 631/14
631/16 631/17 631/18
631/23 632/2 632/13
632/16 634/12 653/19
654/10 654/25 655/12
659/21 667/12 667/17
667/23 672/10 672/16
672/20 713/8

President Trump [2]
631/16 631/17

President Trump's [1]
631/18

President's [2] 631/21
632/7

presidential [5] 624/17
630/14 634/2 640/16
654/9

pressure [1] 637/22

prevent [3] 604/25
640/1 672/21

previous [2] 669/8
681/15

previously [3] 618/12
667/16 669/22

primarily [1] 685/14

principle [1] 702/24

principles [1] 607/6

print [1] 703/12

printed [1] 703/13

prior [6] 618/11 658/1
681/5 682/24 713/21
713/22

private [2] 632/10
638/12

privilege [17] 617/9
654/13 654/14 654/16
655/16 660/15 661/5
667/14 667/21 668/6
672/11 672/17 672/20
673/13 682/10 682/11
683/18

privileged [1] 659/23

privileges [12] 654/8
654/10 654/11 655/12
655/14 655/24 660/3
667/15 673/14 684/24
685/1 685/5

probably [1] 707/2

problems [1] 616/4

procedure [4] 649/20
650/11 685/1 685/3

procedures [10]
623/24 662/24 671/25
673/19 673/22 673/24
674/2 678/22 679/12
691/11

proceeding [1] 675/6

proceedings [1] 720/5

process [16] 624/7
648/18 654/10 693/20
701/24 706/25 711/25
712/4 712/10 714/10
714/12 714/17 716/4
716/17 716/21 716/22

processes [1] 605/7

produce [18] 623/7
623/14 628/18 630/10
661/7 661/8 671/2
671/16 672/13 673/5
673/12 690/23 692/20
693/10 693/11 693/14
693/22 694/23

produced [3] 608/3
650/5 668/16

produces [1] 691/14

producing [2] 667/15
670/18

production [11]
621/10 644/22 645/1
649/3 649/14 649/15
649/24 654/18 692/19
692/21 695/7

proffer [3] 605/15
607/11 609/2

promote [1] 634/13

proof [15] 625/20
641/14 689/6 689/8
690/2 703/6 703/7
704/2 704/6 704/19
705/5 706/4 707/8
707/18 707/20

proposals [1] 634/1

prosecution [4]
602/22 605/18 674/5
675/2

prosecutors [2]
704/11 704/12

protect [3] 640/13
684/24 685/5

protected [1] 654/7

protection [1] 654/18

protections [1] 603/8

Proud [3] 636/5

prove [3] 617/21
625/21 704/3

provide [24] 621/8
627/21 628/4 629/16
639/13 641/3 648/2
648/3 653/24 660/4
667/2 669/6 671/3
673/13 673/17 675/4
675/14 675/20 678/4
678/11 678/15 683/1
691/10 691/18

provided [15] 625/18
625/19 641/1 642/12
649/5 649/14 677/22
678/14 678/16 703/15
708/15 708/16 708/18
709/18 709/21

provides [4] 605/14
691/3 691/6 712/1

providing [5] 640/18
641/8 664/20 664/24
683/10

provisions [1] 663/9

public [9] 624/16
632/14 634/11 635/7
637/21 700/16 711/13
712/22 712/25

publicizing [1] 633/16

publicly [1] 636/13

publish [8] 643/3
651/19 657/21 665/24
669/18 676/16 680/8
715/2

published [10] 643/6
651/22 658/7 666/6
666/13 670/5 676/19
680/22 690/15 708/24

pull [1] 690/13

pulled [1] 708/24

purported [2] 661/5
672/12

purportedly [2] 654/5
713/15

purporting [1] 653/24

purports [2] 654/1
654/25

purpose [14] 609/21
621/24 622/3 625/5
625/18 658/2 663/11
668/20 668/22 669/23
680/14 680/18 681/13
683/9

purposes [2] 680/13

Pursuant [1] 623/1

pursue [1] 718/8

put [7] 638/4 640/1
647/20 694/12 695/18
701/12 715/5

putting [7] 622/11
629/24 638/19 656/17
657/4 669/3 708/10

Q

question [45] 603/7
603/9 603/22 603/24
604/3 604/11 605/9
607/10 609/2 609/3
610/21 610/24 610/25
612/13 613/2 614/10
615/19 639/19 646/16
651/11 685/4 686/2
687/16 687/25 688/4
689/3 691/25 693/19
693/24 694/11 694/14
694/16 694/17 705/3
705/25 706/2 707/9
707/11 707/14 707/17
713/17 715/13 715/21
716/3 718/7

questioning [3]
609/11 613/22 718/8

questions [20] 605/3
605/15 606/3 607/11
607/18 608/20 608/21
608/25 610/25 612/6
612/10 613/3 613/5
613/8 614/12 615/1
617/6 621/13 661/23
712/6

Quiana [1] 602/10

quick [1] 717/22

quickly [1] 707/7

quite [2] 610/4 664/5

quote [1] 654/1

quoted [1] 627/5

quotes [1] 653/21

R

radio [1] 650/14

raise [2] 602/18 668/4

raised [2] 610/24
616/3

raises [1] 617/1

rally [13] 630/11
630/18 630/21 630/22
631/1 631/6 631/8

R	Case 1:21-cr-00679-GJM Document 178 Filed 12/31/22 Page 142 of 149	717/20 718/19 718/20 626/24 629/11 635/13	relation [4] 626/9 638/11 652/13 662/2
<p>rally... [6] 631/15 631/19 631/22 631/24 633/16 635/9</p> <p>random [1] 606/15</p> <p>range [4] 628/25 639/16 639/25 671/4</p> <p>ranking [1] 634/16</p> <p>rather [2] 609/3 609/4</p> <p>rationale [1] 656/9</p> <p>reach [2] 647/1 667/11</p> <p>reached [1] 643/24</p> <p>read [27] 623/18 628/14 631/12 644/17 649/9 649/23 654/3 655/9 659/18 660/10 660/18 661/3 661/18 662/12 667/8 670/25 671/13 672/6 673/10 674/10 677/11 681/22 682/22 705/2 707/7 709/15 713/12</p> <p>reading [3] 653/22 662/21 718/5</p> <p>reads [1] 630/11</p> <p>ready [1] 706/20</p> <p>realize [1] 664/4</p> <p>really [2] 714/22 718/3</p> <p>reason [21] 603/4 603/19 616/6 616/12 616/13 617/3 617/4 617/5 618/6 624/22 625/2 625/11 626/3 627/13 646/14 659/9 660/20 668/5 677/22 682/6 713/18</p> <p>reasonably [1] 650/3</p> <p>reasons [7] 616/21 616/24 625/2 625/6 682/25 712/15 712/21</p> <p>recall [13] 625/17 688/16 690/10 693/3 695/14 701/24 704/10 704/21 706/7 707/23 711/22 712/7 712/13</p> <p>receive [5] 650/18 650/24 665/7 665/19 667/12</p> <p>received [4] 653/18 653/25 665/11 675/22</p> <p>receiving [4] 656/5 687/12 687/17 714/19</p> <p>recess [7] 664/7 717/13 717/14 717/14</p>	<p>recipient [9] 622/2 622/5 623/13 691/11 692/3 692/5 692/6 716/9 716/18</p> <p>recipients [4] 714/16 715/1 715/10 716/2</p> <p>recognize [1] 607/17</p> <p>recollection [12] 652/18 675/23 689/13 695/9 701/2 701/6 701/9 701/18 705/3 705/16 706/10 707/10</p> <p>recommend [3] 623/23 683/4 695/16</p> <p>recommendation [2] 683/6 702/2</p> <p>reconsider [1] 618/11</p> <p>record [17] 602/7 605/10 616/4 618/10 618/19 619/1 619/17 639/24 663/13 664/11 666/9 700/17 706/8 709/3 711/13 717/15 720/5</p> <p>records [17] 612/7 630/2 632/12 632/23 633/3 633/12 633/25 635/6 635/10 639/5 639/5 648/3 654/5 661/8 686/12 686/21 690/9</p> <p>redacting [2] 618/15 618/19</p> <p>refer [6] 603/15 606/21 663/9 679/13 682/21 683/12</p> <p>reference [20] 623/12 624/3 624/5 626/18 627/20 629/6 630/20 632/25 633/1 634/6 634/7 636/7 663/5 663/5 671/8 671/10 673/7 673/21 673/22 679/1</p> <p>referenced [3] 653/7 672/1 713/1</p> <p>references [2] 653/20 654/12</p> <p>referral [6] 605/24 606/15 606/23 615/1 662/25 668/25</p> <p>referred [1] 707/21</p> <p>referring [18] 624/6</p>	<p>636/22 641/15 643/23 644/12 662/17 662/20 665/18 669/14 671/22 671/23 674/18 675/1 675/8 702/7</p> <p>refers [3] 674/4 675/2 712/15</p> <p>reflect [1] 614/19</p> <p>reflected [1] 695/3</p> <p>reflects [1] 666/9</p> <p>refresh [3] 675/22 705/3 707/10</p> <p>refreshes [2] 705/16 706/10</p> <p>refusal [6] 660/4 671/18 671/20 673/11 683/1 683/3</p> <p>refusing [5] 623/16 656/9 657/2 663/21 673/15</p> <p>regard [7] 684/13 685/12 687/24 688/7 691/13 708/9 716/12</p> <p>regarding [4] 627/10 636/5 644/14 708/2</p> <p>Regardless [1] 661/5</p> <p>regulations [6] 623/24 639/9 640/15 708/18 709/7 709/20</p> <p>reiterate [1] 668/22</p> <p>reiterated [2] 631/8 631/24</p> <p>rejected [3] 657/1 660/19 682/13</p> <p>rejecting [2] 656/22 659/9</p> <p>relate [5] 630/3 631/1 633/4 639/24 640/19</p> <p>related [10] 629/11 629/22 631/1 634/23 635/20 639/13 655/24 676/11 682/9 716/8</p> <p>relates [2] 619/21 632/23</p> <p>relating [24] 621/8 623/21 626/16 628/24 630/10 631/17 631/21 632/12 632/23 633/3 633/12 633/25 635/6 635/10 636/9 638/25 654/6 671/4 674/13 674/19 674/20 675/5 675/15 678/5</p>	<p>638/11 652/13 662/2 relations [1] 635/7 relationship [6] 636/17 636/18 636/21 636/22 636/22 637/3 relationships [1] 638/23</p> <p>relevance [5] 685/20 689/17 695/12 695/24 709/23</p> <p>relevant [23] 603/15 603/18 613/23 615/12 615/17 623/23 624/23 625/3 625/6 626/5 626/25 627/14 629/10 631/22 635/10 636/17 637/11 637/19 638/16 638/16 687/14 701/15 701/16</p> <p>relied [2] 616/23 617/8</p> <p>relies [2] 659/19 659/20</p> <p>rely [1] 672/10</p> <p>remains [2] 665/25 680/9</p> <p>remarks [2] 631/19 631/21</p> <p>remember [6] 684/19 695/22 707/20 712/5 712/9 712/23</p> <p>remind [4] 621/4 621/6 621/12 661/24</p> <p>reminds [1] 659/3</p> <p>repeated [3] 633/6 636/13 715/14</p> <p>report [1] 683/7</p> <p>reported [3] 600/21 602/21 626/14</p> <p>reportedly [2] 637/14 638/3</p> <p>Reporter [2] 600/21 720/3</p> <p>reporting [1] 713/23</p> <p>reports [4] 602/20 632/14 712/22 712/25</p> <p>represent [2] 609/17 643/22</p> <p>representative [8] 603/23 614/6 614/9 627/16 637/8 637/10 637/12 640/9</p> <p>Representative McCarthy [1] 614/9</p>

<p>R</p> <p>Representatives [5] 604/4 623/2 637/13 683/5 692/18</p> <p>represented [3] 646/10 646/25 647/1</p> <p>representing [3] 643/25 644/4 653/12</p> <p>request [10] 649/10 655/17 655/20 655/24 659/25 672/12 677/17 682/5 685/24 718/4</p> <p>requested [1] 716/13</p> <p>requesting [2] 659/22 681/16</p> <p>requests [1] 638/25</p> <p>require [4] 605/15 609/1 620/13 629/15</p> <p>required [22] 607/11 618/4 618/24 620/8 620/11 621/7 627/21 628/3 628/18 630/10 639/13 640/24 648/1 649/17 661/12 661/25 665/1 665/3 673/8 701/19 702/10 709/17</p> <p>requires [4] 623/13 635/6 650/7 694/9</p> <p>requiring [1] 612/3</p> <p>researched [1] 629/22</p> <p>reserve [1] 614/22</p> <p>resolution [8] 623/1 623/3 623/4 668/25 674/4 674/25 681/6 709/19</p> <p>resolved [3] 617/19 618/17 655/16</p> <p>respect [11] 605/2 614/12 632/8 634/1 636/25 653/6 656/6 668/17 672/11 688/6 701/11</p> <p>respectfully [1] 677/17</p> <p>respond [5] 655/17 661/22 662/15 681/14 716/18</p> <p>responding [2] 666/21 678/4</p> <p>response [6] 617/15 652/9 659/16 663/21 677/18 701/20</p> <p>responsibilities [3] 634/17 682/3 685/12</p> <p>responsible [1] 685/14</p>	<p>responsive [8] 648/15 650/3 650/5 661/8 716/15 716/19 716/20 716/24</p> <p>rest [5] 615/11 629/14 644/17 671/13 673/10</p> <p>restate [1] 657/23</p> <p>result [1] 662/25</p> <p>results [5] 630/14 634/2 638/1 671/7 671/9</p> <p>retire [1] 619/22</p> <p>return [1] 649/11</p> <p>Returning [1] 652/16</p> <p>review [6] 685/16 706/9 706/14 706/16 712/1 712/11</p> <p>reviewed [3] 629/22 688/11 711/20</p> <p>reviewing [3] 631/10 687/13 687/17</p> <p>revisit [1] 667/16</p> <p>Riane [1] 602/14</p> <p>right [71] 609/10 615/9 617/1 622/25 626/11 627/18 628/6 628/9 630/5 633/24 635/24 641/13 641/25 642/20 643/8 644/16 645/9 647/3 647/20 649/8 650/23 651/25 652/19 652/22 652/23 652/25 653/5 654/12 654/24 655/4 655/9 656/11 656/20 657/10 658/16 659/15 660/6 660/10 660/23 662/12 663/9 663/15 663/19 664/5 665/22 666/23 667/4 668/15 669/1 669/10 670/21 674/6 675/25 676/22 677/6 680/2 681/10 681/18 681/19 681/22 682/15 692/22 692/23 703/11 703/14 705/2 705/20 707/8 711/14 712/24 717/3</p> <p>rights [2] 684/24 685/5</p> <p>rise [1] 717/19</p> <p>Road [1] 600/15</p> <p>roadmap [2] 715/3 715/7</p> <p>Robert [3] 641/2 642/9 703/19</p>	<p>Robert Costello [2] 641/2 703/19</p> <p>role [8] 622/10 629/24 632/7 634/18 636/19 656/17 657/3 687/24</p> <p>roles [2] 629/9 701/10</p> <p>room [6] 619/22 619/23 632/24 632/25 633/3 633/5</p> <p>ROSE [1] 600/10</p> <p>row [1] 620/6</p> <p>RPR [1] 600/21</p> <p>Rudolph [1] 638/8</p> <p>rule [3] 605/14 639/9 718/9</p> <p>ruled [1] 709/22</p> <p>rules [8] 605/13 623/2 623/24 645/2 667/18 708/15 708/16 709/12</p> <p>ruling [5] 607/15 609/6 609/19 613/2 667/12</p> <p>rulings [2] 618/1 618/11</p> <p>run [2] 616/3 633/1</p> <p>running [1] 620/5</p> <hr/> <p>S</p> <p>said [23] 604/19 608/19 609/7 611/8 612/5 613/24 617/17 618/6 625/16 631/4 635/17 644/11 646/2 647/16 653/9 666/12 682/20 684/17 689/1 690/25 691/1 693/18 695/15</p> <p>same [10] 626/19 638/2 658/13 668/6 669/19 669/21 671/25 680/13 681/4 682/11</p> <p>sample [1] 627/17</p> <p>satisfied [1] 649/16</p> <p>saw [5] 627/20 640/14 654/12 664/17 670/12</p> <p>say [18] 608/13 610/10 613/13 613/23 614/6 617/4 618/22 636/21 643/20 644/13 686/13 691/20 692/12 701/5 703/3 705/22 709/6 716/19</p> <p>saying [5] 610/6 625/24 673/3 686/3 693/9</p>	<p>says [47] 610/10 611/10 622/25 623/6 623/19 626/6 627/1 627/5 628/16 629/3 631/14 635/6 641/22 644/19 645/24 649/10 649/24 652/7 652/8 653/17 654/5 655/11 655/19 659/20 660/12 661/5 661/20 662/14 662/22 667/11 671/1 671/15 672/8 673/11 674/1 674/12 677/13 681/24 682/24 690/22 690/23 691/16 692/19 703/1 703/9 703/12 709/17</p> <p>schedule [16] 623/8 627/20 628/2 629/14 644/25 690/24 692/21 695/18 714/2 714/3 714/8 714/14 714/15 714/23 715/9 715/24</p> <p>scheduled [1] 671/17</p> <p>schedules [2] 689/22 715/3</p> <p>SCHOEN [7] 600/14 600/15 602/14 616/1 618/10 618/25 718/2</p> <p>scope [3] 615/20 627/11 667/13</p> <p>Scott [3] 637/8 637/10 637/12</p> <p>SCOTUS [1] 603/17</p> <p>scratch [1] 715/25</p> <p>screen [1] 705/11</p> <p>script [1] 608/2</p> <p>sealed [1] 711/12</p> <p>search [3] 650/1 650/4 650/8</p> <p>seated [1] 704/12</p> <p>second [12] 605/20 610/23 623/17 653/2 654/19 672/6 679/23 682/15 682/23 703/5 713/5 713/6</p> <p>Section [2] 709/19 709/21</p> <p>Sections [2] 662/25 673/20</p> <p>see [13] 615/10 622/18 641/17 642/2 643/17 647/13 649/3 689/23 703/1 705/19 705/22</p>
--	---	---	--

<p>S Case 1:21-cr-00670-GJN Document 178 Filed 12/31/22 Page 144 of 148</p> <p>see... [2] 706/10 707/21</p> <p>seeing [1] 705/11</p> <p>seeking [6] 612/7 622/6 625/9 635/3 636/16 678/4</p> <p>seeks [3] 627/9 654/5 672/22</p> <p>seemed [1] 618/2</p> <p>seems [4] 603/3 604/18 608/9 614/18</p> <p>seen [1] 703/4</p> <p>Select [74] 620/23 622/4 622/6 623/6 623/19 624/21 627/9 627/11 629/21 631/10 634/17 639/21 640/4 644/19 652/10 656/8 658/20 658/25 659/4 660/1 661/7 661/20 661/23 662/14 662/23 671/3 671/17 672/14 672/15 672/18 672/21 673/4 673/12 673/16 673/17 674/15 674/16 674/21 675/4 676/7 680/4 681/24 683/3 683/7 684/3 684/19 684/23 685/4 685/13 685/18 685/23 686/5 686/11 686/18 686/24 687/3 687/6 687/9 687/12 687/14 687/16 688/12 689/21 692/22 693/7 693/8 693/15 693/16 695/1 702/10 702/18 709/12 713/6 713/9</p> <p>selected [1] 700/25</p> <p>selection [1] 702/20</p> <p>Senate [1] 624/15</p> <p>send [2] 650/22 657/7</p> <p>sending [4] 644/9 657/4 664/19 668/20</p> <p>senior [1] 701/25</p> <p>sense [4] 618/5 622/5 625/8 684/23</p> <p>sensitive [1] 654/18</p> <p>sent [42] 621/25 622/7 645/14 645/15 650/20 651/8 652/11 652/12 657/11 658/13 658/23 658/25 659/17 662/2</p>	<p>662/4 663/12 663/22 664/16 664/22 665/5 667/20 668/18 669/14 670/12 670/15 675/13 676/7 676/13 677/3 680/4 681/2 681/5 681/7 681/9 681/11 682/20 683/15 683/16 714/16 714/24 714/25 715/9</p> <p>sentence [5] 627/1 653/16 661/19 662/13 670/25</p> <p>sentences [1] 661/4</p> <p>September [14] 642/11 642/25 643/1 643/9 643/17 645/15 645/21 647/21 647/23 648/6 652/10 688/19 689/16 690/7</p> <p>series [1] 609/17</p> <p>serious [2] 675/1 683/12</p> <p>serve [1] 703/25</p> <p>served [7] 641/22 653/20 703/12 705/6 706/5 706/6 707/19</p> <p>server [2] 642/3 703/10</p> <p>serves [1] 621/25</p> <p>service [26] 641/14 642/5 644/10 644/15 644/23 645/25 689/6 689/9 690/2 703/6 703/7 703/18 704/2 704/3 704/6 704/7 704/19 704/20 705/5 706/5 707/8 707/18 707/21 707/25 708/2 708/7</p> <p>session [4] 600/7 624/15 634/9 690/8</p> <p>set [4] 623/1 623/8 673/19 701/22</p> <p>sets [1] 608/6</p> <p>Seventeen [1] 629/17</p> <p>several [7] 636/9 647/5 685/15 704/11 704/11 711/19 714/25</p> <p>shall [3] 649/12 649/14 709/17</p> <p>she [14] 604/15 609/14 610/10 610/11 610/12 610/14 610/24 611/4</p>	<p>612/16 620/16 701/18 705/11 705/25 706/14</p> <p>she's [1] 705/11</p> <p>shed [1] 675/10</p> <p>shine [1] 635/22</p> <p>should [16] 606/7 607/10 614/3 615/2 619/7 620/1 620/2 672/20 675/5 693/10 693/21 694/20 694/23 695/6 700/22 717/24</p> <p>shouldn't [5] 603/9 603/22 603/24 604/3 701/17</p> <p>show [9] 604/10 604/25 616/8 617/18 625/23 668/9 676/2 704/23 713/15</p> <p>showing [4] 617/5 705/17 705/18 706/12</p> <p>sic [1] 665/24</p> <p>side [6] 603/20 604/16 655/6 655/6 674/7 674/7</p> <p>sidebar [7] 695/25 696/2 696/3 700/15 709/24 709/25 711/11</p> <p>sign [8] 693/15 694/3 694/5 694/7 695/4 703/2 703/4 712/11</p> <p>signatory [1] 612/14</p> <p>signature [6] 642/2 692/17 694/9 702/25 703/9 703/10</p> <p>signed [9] 612/17 641/25 649/25 689/1 689/4 689/8 689/11 690/2 712/12</p> <p>significant [1] 684/22</p> <p>signs [3] 622/14 622/16 694/1</p> <p>silence [1] 650/15</p> <p>SILVERMAN [1] 600/18</p> <p>similar [1] 641/17</p> <p>similarities [1] 684/17</p> <p>since [2] 616/5 655/11</p> <p>single [2] 607/10 671/16</p> <p>sir [17] 639/20 684/7 684/15 685/7 689/23 690/6 693/3 693/23 695/10 701/23 704/21 707/21 711/22 713/13</p>	<p>715/2 716/3 716/17 sit [1] 667/23</p> <p>sitting [3] 695/22 700/24 715/13</p> <p>situation [1] 605/14</p> <p>six [1] 662/4</p> <p>Sixth [1] 609/10</p> <p>skirt [1] 605/11</p> <p>slammed [1] 604/1</p> <p>slightly [1] 693/19</p> <p>SLUTKIN [1] 600/18</p> <p>so [112] 602/25 603/8 603/11 603/21 604/9 604/13 605/3 605/16 606/14 607/5 607/9 608/18 609/9 610/3 610/20 610/22 611/24 612/19 613/2 613/10 613/13 613/22 615/12 615/21 616/3 616/4 616/15 616/15 617/6 618/9 618/9 620/6 620/9 620/16 620/24 622/14 622/20 622/25 624/11 624/21 625/8 625/16 627/12 627/22 629/9 629/14 630/6 630/25 632/11 634/21 638/22 646/10 647/6 647/7 647/20 647/23 648/11 649/17 650/6 650/17 652/22 653/1 653/23 654/12 655/19 656/16 656/21 658/1 658/16 658/19 659/12 660/18 661/13 662/2 663/15 663/19 664/6 666/17 668/8 668/12 668/15 675/2 675/13 677/19 677/21 681/2 681/12 690/22 691/5 691/16 691/19 692/9 692/12 693/9 693/20 693/25 701/18 702/13 702/14 707/21 708/12 709/3 709/12 714/12 714/20 715/4 716/9 717/25 718/7 718/14 718/15 718/16</p> <p>sole [1] 660/12</p> <p>solely [1] 606/21</p> <p>solely-political [1] 606/21</p> <p>some [24] 602/24</p>
--	--	--	---

<p>S</p> <p>some... [23] 605/3 606/12 606/14 609/9 609/9 611/5 613/7 613/8 614/11 617/18 622/20 625/1 629/8 630/3 639/6 639/11 640/8 640/10 664/4 685/11 692/12 703/4 713/7</p> <p>somebody [2] 675/1 691/14</p> <p>somehow [8] 603/15 603/15 605/25 606/19 612/24 613/23 615/7 655/24</p> <p>someone [4] 606/9 608/22 613/5 641/4</p> <p>something [8] 604/20 609/4 611/4 611/6 640/2 666/12 691/23 714/8</p> <p>sometime [1] 688/17</p> <p>sometimes [3] 691/8 691/8 703/24</p> <p>sorry [4] 616/2 651/11 666/20 689/3</p> <p>sort [3] 614/4 641/17 691/19</p> <p>sought [4] 613/18 646/24 647/1 660/1</p> <p>source [3] 713/4 713/9 713/17</p> <p>sources [2] 713/3 713/11</p> <p>spans [1] 674/8</p> <p>speak [4] 701/23 712/16 713/6 714/17</p> <p>speakers [1] 631/7</p> <p>Special [1] 602/11</p> <p>specialist [1] 602/10</p> <p>specific [22] 604/7 604/7 605/15 609/4 615/4 640/6 648/18 663/9 673/13 688/16 689/25 692/5 695/15 701/24 702/19 712/7 715/5 715/12 715/12 715/15 716/9 717/10</p> <p>specifically [7] 639/2 669/2 687/24 691/13 711/22 712/5 718/12</p> <p>specifics [2] 712/9 715/16</p>	<p>specified [3] 628/25 640/5 649/11</p> <p>speed [1] 707/3</p> <p>spoke [2] 687/2 713/16</p> <p>staff [17] 609/14 620/7 622/10 685/13 685/15 685/19 686/5 686/11 688/10 694/25 695/16 701/25 711/19 711/25 712/10 713/10 714/11</p> <p>stage [2] 610/19 614/19</p> <p>stand [5] 607/25 608/12 609/13 611/9 611/9</p> <p>start [9] 607/14 608/21 611/24 616/6 628/10 651/25 652/19 676/22 688/14</p> <p>started [1] 684/16</p> <p>starting [2] 643/9 701/5</p> <p>starts [6] 624/21 642/25 659/18 660/8 670/25 673/3</p> <p>stated [6] 623/15 637/24 660/2 666/1 672/10 682/25</p> <p>statement [2] 606/2 658/5</p> <p>statements [4] 633/8 633/9 635/14 635/22</p> <p>states [13] 600/1 600/2 600/8 602/4 602/10 630/24 644/20 653/15 653/19 663/6 671/5 673/20 674/5</p> <p>stating [3] 627/6 632/14 650/1</p> <p>statute [7] 659/6 660/16 662/20 663/10 671/24 671/25 674/3</p> <p>staying [1] 626/17</p> <p>step [4] 675/1 681/8 683/10 683/12</p> <p>STEPHEN [9] 600/5 602/5 602/15 628/17 641/18 643/22 652/9 653/6 677/14</p> <p>steps [2] 606/4 611/10</p> <p>Steve [16] 645/25 684/5 684/9 693/10 693/21 694/20 694/22</p>	<p>700/21 708/6 712/16 714/25 715/9 715/24 716/13 716/14 716/23</p> <p>stick [1] 608/8</p> <p>still [7] 656/7 660/21 687/4 687/6 687/9 687/12 687/17</p> <p>stipulation [1] 639/17</p> <p>stolen [10] 631/5 631/9 631/25 633/7 634/14 635/8 635/18 635/23 636/15 638/14</p> <p>stop [2] 609/1 609/6</p> <p>stored [2] 628/20 629/3</p> <p>straight [1] 647/8</p> <p>strategies [1] 626/16</p> <p>Street [2] 600/12 600/18</p> <p>subcommittee [2] 690/25 691/2</p> <p>subject [3] 654/20 659/6 684/3</p> <p>subjects [1] 625/25</p> <p>submit [2] 649/25 674/14</p> <p>subpoena [148]</p> <p>subpoenaed [1] 629/7</p> <p>subpoenaing [1] 603/23</p> <p>subpoenas [16] 612/17 656/14 686/17 686/22 686/24 687/1 695/19 702/21 703/25 714/18 714/20 715/6 715/15 715/18 716/1 716/4</p> <p>successors [1] 638/1</p> <p>such [13] 604/22 607/16 628/19 639/5 640/16 655/16 667/11 672/17 672/19 675/11 678/16 690/8 695/18</p> <p>sufficient [1] 637/25</p> <p>suggest [4] 606/12 606/18 607/7 614/2</p> <p>suggested [1] 633/10</p> <p>suggesting [1] 706/5</p> <p>suggestion [1] 611/5</p> <p>suggests [2] 615/5 615/5</p> <p>Suite [1] 600/15</p> <p>summoned [1] 673/17</p> <p>supervising [1] 656/17</p>	<p>support [4] 630/12 640/11 660/17 683/2</p> <p>supposed [1] 621/13</p> <p>Supreme [2] 604/1 612/4</p> <p>sure [10] 603/6 603/8 605/8 654/22 663/14 666/9 683/13 691/25 693/23 702/7</p> <p>surplus [1] 691/19</p> <p>suspect [1] 718/15</p> <p>switch [1] 690/18</p> <p>Sydney [1] 638/9</p> <hr/> <p>T</p> <p>table [3] 602/10 620/7 704/13</p> <p>tablets [1] 628/21</p> <p>take [17] 614/17 615/21 620/10 627/22 633/11 647/23 648/7 657/10 663/24 675/24 677/6 682/15 705/2 706/9 717/9 717/13 718/10</p> <p>taken [11] 609/15 609/18 609/22 609/23 610/14 664/7 681/8 683/10 684/13 717/20 718/20</p> <p>takes [1] 659/24</p> <p>taking [2] 638/1 680/15</p> <p>talk [10] 613/10 613/20 613/20 641/18 647/25 658/17 669/1 681/12 713/18 715/24</p> <p>talked [6] 617/11 621/5 624/4 645/7 663/15 663/19</p> <p>talking [11] 609/19 611/6 620/23 626/19 640/22 640/23 647/4 671/10 673/23 707/20 718/15</p> <p>tell [13] 632/4 645/20 659/1 660/20 661/10 701/2 704/15 704/18 705/25 706/4 706/20 707/10 707/17</p> <p>telling [3] 611/17 611/18 674/24</p> <p>tells [1] 662/18</p> <p>Ten [1] 662/1</p>
---	--	--	--

T 642/18 644/16 645/8
terms [5] 608/4 608/6
659/4 685/17 717/7
testified [15] 612/16
639/7 640/7 641/1
648/1 656/20 666/17
677/2 679/10 684/2
689/4 700/21 703/6
707/13 717/3
testifies [1] 608/3
testify [6] 603/19
612/18 672/13 700/22
701/1 709/18
testifying [9] 603/18
603/21 607/21 609/14
610/7 615/18 620/22
667/16 684/18
testimony [25] 608/1
612/11 612/21 613/4
615/11 615/12 627/10
644/22 654/5 655/18
655/20 660/1 667/3
668/16 671/4 673/17
684/16 684/21 685/24
687/3 689/8 693/12
693/13 694/6 708/12
testing [2] 605/21
606/1
text [1] 639/5
than [10] 608/14 609/3
609/4 610/17 650/14
666/12 668/6 683/18
686/4 702/16
Thank [27] 607/13
611/22 611/23 615/24
615/25 617/14 619/4
619/9 620/17 626/1
647/18 657/23 658/8
664/12 664/13 666/1
666/15 669/20 670/7
680/11 680/23 683/22
683/24 717/17 717/18
718/17 718/18
Thanks [1] 619/18
that [649]
that's [89] 605/19
608/8 608/10 611/7
614/1 616/12 617/19
620/1 621/25 623/5
623/12 624/14 625/4
626/22 628/5 629/10
629/11 629/11 634/8
640/25 641/22 641/24
642/4 642/11 642/11

649/19 650/10 650/23
652/18 652/24 656/12
657/19 657/23 663/7
663/9 665/22 667/22
671/12 672/2 673/9
673/25 675/1 676/14
682/14 684/8 685/9
686/7 687/5 687/8
688/8 689/10 690/12
691/17 691/19 691/21
691/24 692/14 692/15
692/21 692/23 692/25
700/21 700/23 702/14
702/15 703/8 703/9
703/11 703/14 703/17
703/21 704/1 704/5
704/8 707/9 708/4
708/8 709/5 709/9
709/11 709/14 712/18
712/24 713/2 713/20
714/7
their [4] 607/6 617/5
624/1 689/23
them [12] 611/12
616/14 629/8 647/8
674/14 678/15 686/19
691/5 691/8 691/15
693/11 712/1
then [19] 602/23
604/11 618/18 619/22
623/6 625/1 627/2
627/5 629/14 631/14
651/14 653/18 663/21
674/7 684/13 695/2
703/19 713/8 717/13
then-President [1]
713/8
then-President Trump
[1] 627/2
Then-President
Trump's [1] 631/14
there [106] 602/17
603/8 603/11 603/21
603/23 604/3 605/3
605/7 605/10 606/5
606/12 608/13 609/9
609/9 613/7 613/8
614/15 614/15 617/18
618/16 620/3 620/25
623/17 624/3 624/5
628/9 628/10 629/5
629/9 630/20 630/22
631/11 632/14 633/12

637/22 637/25 638/3
638/5 640/3 640/6
641/19 642/8 643/17
643/23 644/18 645/12
648/18 648/21 649/9
651/9 651/12 651/14
652/5 653/2 654/13
655/19 659/13 661/16
661/19 662/17 667/6
667/9 671/8 671/22
673/21 674/11 674/12
674/19 675/8 676/8
681/4 682/18 682/23
684/4 684/8 684/17
684/22 684/23 684/25
685/1 685/3 685/4
689/15 690/2 690/8
690/19 690/22 694/17
694/24 694/25 695/16
701/12 701/18 702/4
702/9 702/16 702/19
706/13 707/22 712/22
713/22 713/23 714/23
714/24 715/8 715/11
there's [16] 603/6
605/1 608/16 611/5
611/9 616/2 624/3
624/4 639/15 651/14
676/9 684/22 695/17
706/8 715/17 717/5
therefore [4] 610/5
617/1 655/11 673/18
these [38] 603/2 607/6
611/10 613/20 614/7
617/6 625/25 627/10
629/19 629/21 631/11
632/4 634/22 636/23
638/12 638/16 639/1
640/21 642/24 646/19
647/12 654/11 655/16
657/22 664/4 668/12
680/4 680/15 680/17
681/2 709/7 709/12
709/19 714/5 716/13
716/15 716/19 716/20
they [44] 603/20 604/6
604/15 604/17 604/17
605/25 606/4 606/9
606/11 606/12 606/18
606/20 607/2 607/4
607/5 608/15 611/20
612/2 612/6 612/8
612/8 612/9 612/9
612/17 612/23 613/6

614/2 627/16 630/4
631/4 634/10 635/17
668/3 691/4 691/6
691/8 691/9 691/12
692/4 704/14 705/4
705/9 707/13 716/10
they're [4] 608/14
609/20 611/18 716/9
they've [1] 650/8
thing [6] 614/25
626/19 626/23 653/15
690/1 708/13
things [15] 609/14
612/18 617/11 627/12
627/13 627/20 631/1
646/19 658/17 676/11
690/23 692/20 693/18
707/3 712/22
think [29] 603/5
605/10 607/2 607/9
608/12 608/25 609/2
610/1 612/1 614/7
615/2 615/10 615/10
616/2 617/1 617/3
666/2 682/20 691/21
694/15 694/16 703/6
705/9 705/10 707/2
707/7 714/1 717/25
718/4
thinks [5] 605/12
605/20 614/4 614/5
625/6
third [4] 711/15 712/15
712/20 713/14
this [237]
THOMPSON [25]
600/18 603/23 607/4
609/16 609/18 610/10
610/11 610/15 610/17
612/14 622/17 644/25
657/17 658/21 670/11
670/13 677/13 677/16
693/9 693/17 694/1
703/2 708/14 711/23
712/7
Thompson's [1]
659/16
thorough [2] 638/20
639/24
thoroughness [3]
605/22 606/1 611/1
those [26] 612/18
617/11 617/12 618/11
620/14 627/13 631/5

T
those... [19] 631/19
631/23 636/10 638/10
638/21 639/6 639/25
640/10 648/23 655/14
658/4 660/3 663/8
663/16 676/11 679/12
680/24 712/23 714/24
thought [5] 614/9
616/18 635/19 693/23
718/6
thought-out [1] 718/6
thoughtfully [1]
677/19
threat [1] 623/15
three [8] 627/12 636/6
636/11 637/4 642/20
658/16 675/17 675/18
Three Percenters [1]
637/4
three-page [2] 642/20
658/16
through [12] 609/25
610/13 615/10 617/7
629/2 636/1 641/2
655/13 668/18 702/12
705/2 708/12
tight [1] 702/14
time [32] 621/7 621/15
626/14 629/1 648/3
648/5 648/7 648/12
648/18 661/21 661/24
663/25 667/11 667/19
667/23 679/11 681/16
682/7 683/16 689/1
690/3 692/2 694/16
701/12 704/18 705/2
706/9 708/1 708/17
708/19 717/7 717/10
timeframe [1] 702/14
timeline [7] 647/7
647/17 647/20 663/16
663/17 668/12 668/13
timely [1] 682/2
times [1] 617/18
timing [1] 675/23
Title [1] 703/15
titled [3] 628/2 641/13
649/2
today [8] 603/6 643/21
644/20 653/5 684/18
695/22 700/25 718/7
together [8] 622/12
629/25 638/19 656/17

657/4 669/3 701/12
708/10
told [14] 616/5 616/10
616/17 617/2 617/7
622/20 625/11 626/4
644/2 646/6 666/24
667/1 705/4 706/7
tomorrow [2] 627/7
633/9
too [2] 618/14 620/1
took [10] 606/4 611/10
611/11 613/6 629/23
630/23 634/8 658/3
664/15 669/24
top [5] 622/18 641/17
661/15 676/24 718/11
topic [4] 715/16
715/21 717/8 717/9
topics [8] 636/5 637/9
638/10 639/1 640/22
640/23 714/3 714/3
totally [2] 611/3
611/16
touch [1] 646/8
touching [1] 690/24
transcribed [1] 686/7
transcript [2] 600/7
720/4
transfer [7] 623/21
624/6 624/8 624/11
626/21 635/2 639/23
transfers [1] 624/9
transmits [1] 623/7
treat [1] 615/13
TRIAL [1] 600/7
true [3] 625/22 625/25
720/4
Trump [16] 627/2
630/13 631/16 631/17
632/16 633/13 633/14
653/19 654/10 655/12
659/21 661/6 667/12
667/23 677/16 713/8
Trump's [8] 631/14
631/18 660/2 660/13
660/14 667/17 672/10
672/12
truth [5] 658/5 670/1
670/2 680/19 704/16
try [3] 605/11 637/14
716/7
trying [7] 603/3 603/12
612/23 614/5 618/16
705/9 707/7

Tuesday [1] 673/18
turn [3] 602/25 610/22
631/12
turning [2] 608/9
714/1
two [17] 603/11 608/18
622/23 630/7 641/17
647/12 651/14 655/6
661/4 668/12 676/11
679/20 680/2 680/4
681/4 682/18 712/20
two-line [1] 641/17
two-page [1] 651/14
type [2] 625/8 693/1
typed [1] 692/2
types [2] 640/6 654/17
typewriter [1] 692/9
typewritten [1] 692/16
U
U.S [5] 600/10 600/11
600/22 684/9 703/24
U.S. [1] 684/5
U.S. Capitol [1] 684/5
U.S.C [2] 662/24 663/5
ultimate [2] 693/7
695/2
ultimately [1] 679/13
unable [2] 648/19
655/17
unanimously [1] 683/4
unchanged [1] 680/9
under [8] 605/13
614/18 615/22 623/15
637/22 674/3 692/19
702/13
underlying [2] 658/5
670/3
undermines [1] 682/1
understand [41]
602/17 604/9 607/23
609/5 614/20 614/21
614/24 615/9 615/13
615/21 616/20 616/24
617/13 619/3 632/3
638/22 644/13 646/2
653/10 684/4 684/6
684/10 684/12 685/3
685/11 688/8 691/11
691/25 693/18 694/4
694/6 695/21 700/20
703/24 708/12 708/13
712/3 712/6 715/20
716/22 718/15

understanding [11]
624/23 632/6 632/9
635/5 636/17 646/7
646/11 655/21 655/23
678/1 678/3
understood [10]
602/23 610/3 632/1
633/16 634/11 643/25
653/12 682/7 701/10
718/9
UNITED [12] 600/1
600/2 600/8 602/4
602/9 630/24 644/20
653/19 663/6 671/5
673/20 674/4
unless [3] 616/8
709/18 718/12
unpaid [1] 631/16
until [11] 608/3 614/22
614/23 655/16 667/11
687/20 687/22 691/5
691/16 717/14 717/15
up [36] 603/4 603/5
605/21 606/7 606/8
606/9 609/10 616/8
620/5 620/24 621/1
624/1 632/2 632/17
633/6 636/14 637/16
642/16 643/20 648/24
651/2 655/6 657/12
665/13 668/9 669/10
674/7 676/1 679/6
679/23 680/24 690/13
692/2 707/3 708/24
718/7
upon [4] 649/24
653/20 693/4 702/5
urgency [1] 687/3
urgent [1] 681/25
urging [1] 627/3
us [16] 608/9 618/15
619/8 621/4 621/6
621/12 628/15 632/4
637/18 655/11 661/24
672/7 674/11 677/12
686/14 701/15
US000417 [1] 709/6
use [6] 605/8 607/6
614/6 691/23 692/11
709/7
used [4] 669/22 687/2
712/21 715/25
using [1] 712/23

V
various [4] 623/25
 691/7 708/11 716/13
vary [1] 716/9
VAUGHN [13] 600/10
 601/4 602/9 607/13
 610/20 611/24 617/15
 620/16 654/19 663/23
 664/12 683/22 707/14
veer [1] 608/21
versus [2] 602/5
 677/16
very [8] 618/2 618/25
 683/12 701/8 702/14
 708/21 712/6 718/4
via [2] 680/5 691/9
view [14] 604/13 605/3
 608/24 611/15 612/19
 613/21 617/23 619/2
 619/23 620/1 620/5
 659/5 662/15 662/18
views [3] 663/14
 671/20 673/4
violation [6] 617/2
 617/21 671/19 671/21
 674/23 674/25
violence [2] 713/16
 713/24
visible [1] 647/15
voluntarily [1] 708/6
vote [8] 605/24 606/21
 606/23 615/1 615/4
 624/16 674/3 674/25
voted [4] 603/25
 605/25 606/15 683/4
votes [2] 640/16 690/8
vs [1] 600/4

W
wait [1] 619/8
want [34] 603/4 603/8
 606/18 609/8 610/3
 610/23 612/2 612/8
 614/19 615/6 619/8
 619/25 627/22 628/10
 635/24 641/18 643/8
 654/20 658/17 666/8
 672/23 688/8 693/20
 695/22 705/13 708/11
 708/13 712/16 713/6
 713/18 715/3 715/5
 715/17 715/24
wanted [8] 614/25
 619/20 632/3 636/24

643/25 678/1 683/13
 712/19
War [4] 632/24 632/25
 633/3 633/5
warn [1] 662/5
warning [1] 663/11
warranted [1] 605/12
was [217]
Washington [6] 600/4
 600/12 600/23 626/13
 630/12 688/21
wasn't [3] 616/16
 617/9 618/16
watching [1] 690/4
Watkins [2] 604/2
 612/5
Watnick [2] 634/5
 634/15
way [12] 602/23
 605/20 618/4 630/3
 641/3 664/23 665/10
 667/24 668/2 671/9
 678/18 717/1
ways [4] 603/3 603/11
 617/4 691/7
we [148]
We'll [2] 717/14
 717/23
we're [9] 603/6 608/8
 609/16 609/19 611/5
 618/16 647/4 714/14
 715/7
we've [10] 616/5
 617/17 640/22 640/22
 647/23 654/21 660/18
 663/15 663/19 671/10
wear [2] 619/24 620/8
wearing [1] 619/21
week [1] 677/18
weeks [6] 632/2
 632/16 633/6 636/14
 637/16 688/17
welcomes [1] 687/14
well [27] 607/20 614/6
 615/16 615/22 618/25
 620/6 620/9 620/9
 620/14 628/7 630/16
 649/14 663/2 671/6
 675/24 679/24 686/2
 687/16 688/7 692/1
 692/4 701/8 705/14
 707/9 712/7 716/1
 717/11
went [1] 621/21

were [69] 609/14
 609/15 618/2 620/22
 620/23 623/3 626/15
 626/16 626/17 626/19
 627/12 627/16 627/19
 631/4 631/22 633/11
 634/15 635/3 635/10
 635/17 635/21 636/10
 638/1 638/11 638/12
 638/24 638/24 640/22
 641/14 645/3 645/5
 652/17 656/1 657/3
 666/20 669/2 669/13
 672/1 673/23 675/8
 681/2 684/13 684/17
 685/13 686/24 687/23
 687/25 687/25 688/19
 688/22 689/11 689/15
 689/22 689/23 690/2
 690/8 695/15 704/9
 704/12 704/14 704/15
 708/15 708/16 708/18
 712/12 712/22 712/25
 715/11 716/1
what [148]
what's [5] 609/7
 642/21 651/5 651/11
 686/23
when [39] 603/21
 604/25 606/4 611/8
 611/18 612/17 620/22
 621/6 621/12 624/8
 627/19 636/21 646/1
 649/15 652/11 652/13
 653/9 654/13 662/2
 662/18 674/1 674/19
 677/3 684/16 686/6
 689/11 690/1 691/3
 691/6 691/17 704/3
 704/9 705/4 706/20
 708/24 709/6 712/12
 716/4 717/15
whenever [1] 717/5
where [19] 604/19
 604/19 606/8 611/4
 614/17 621/4 624/15
 626/14 631/7 640/5
 641/7 644/13 688/19
 688/24 689/11 690/22
 692/19 703/12 714/3
whether [37] 604/4
 605/24 606/16 606/16
 606/17 607/3 607/22
 608/16 608/22 610/14

610/14 610/25 611/11
 611/19 612/2 612/10
 612/19 613/3 613/5
 613/19 613/25 614/9
 625/21 636/8 644/14
 646/8 646/24 656/6
 666/24 672/17 675/15
 705/4 705/15 706/10
 715/8 716/14 716/23
which [25] 606/20
 606/25 608/2 611/9
 619/21 620/6 621/2
 622/19 631/11 640/3
 643/21 653/7 654/7
 662/25 669/22 673/16
 680/13 681/9 683/7
 688/6 688/18 704/25
 708/21 711/15 713/5
WHITE [5] 600/18
 602/14 630/22 632/7
 632/15
who [53] 602/15
 605/25 608/22 609/13
 611/10 611/14 611/14
 611/14 612/16 613/20
 613/21 614/7 622/14
 622/14 624/10 626/15
 629/7 631/3 631/24
 634/10 635/17 636/9
 636/9 636/10 636/12
 637/10 638/5 638/10
 638/12 638/24 640/7
 643/13 643/15 645/15
 645/18 652/5 658/19
 670/9 685/14 692/8
 693/5 693/15 694/11
 694/20 694/22 694/22
 695/3 695/11 695/14
 700/24 700/25 704/10
 708/1
who's [1] 620/13
whole [3] 639/15
 639/25 705/18
whom [2] 633/25
 684/7
why [24] 603/1 603/24
 607/3 608/20 609/2
 609/3 611/12 611/13
 613/14 616/22 626/24
 635/22 637/18 638/19
 649/13 675/20 675/24
 678/25 681/4 683/18
 705/22 712/16 713/6
 717/13

W
wide [1] 671/4
widespread [2] 637/25
 713/23
will [35] 604/24 604/24
 607/25 608/19 608/23
 609/1 609/1 609/17
 613/9 614/22 616/20
 620/12 644/14 644/23
 645/24 649/15 659/4
 659/25 662/15 662/18
 667/15 667/16 672/20
 673/17 674/2 691/15
 696/1 707/3 709/2
 714/20 717/9 717/14
 717/15 718/14 718/15
Willard [4] 626/7
 626/12 626/13 712/25
willful [7] 606/17
 659/5 662/16 662/19
 662/22 671/18 673/6
willfully [1] 671/15
willing [1] 678/18
within [6] 608/8
 615/20 621/25 627/11
 651/9 658/18
without [2] 610/1
 691/1
witness [48] 601/2
 603/8 604/7 604/11
 604/12 607/19 607/21
 607/22 607/24 608/1
 608/3 608/20 608/22
 609/12 609/13 609/25
 610/7 610/13 611/1
 612/10 613/3 614/24
 615/17 615/18 615/21
 619/7 619/9 642/17
 651/2 657/13 665/13
 669/11 676/2 676/3
 679/7 679/24 684/25
 685/6 694/13 694/16
 701/7 704/23 707/2
 707/5 707/12 709/17
 709/18 717/24
witness's [3] 603/19
 604/7 609/4
witnesses [11] 603/6
 605/1 608/7 608/18
 685/17 686/3 686/4
 686/10 687/4 694/2
 701/15
won't [1] 657/23
wondering [1] 647/9

word [2] 605/17 687/2
words [7] 693/4
 711/21 711/23 712/21
 712/23 715/18 715/23
work [2] 687/20
 687/21
worked [1] 646/20
working [2] 678/14
 688/14
world [1] 702/10
worried [1] 608/9
would [45] 602/18
 604/22 605/4 605/12
 608/1 608/5 614/2
 617/6 618/15 619/25
 620/3 620/12 620/13
 620/24 634/22 637/10
 638/5 638/15 644/9
 644/10 644/11 646/13
 646/21 646/24 647/1
 647/7 653/22 662/23
 664/1 668/24 686/12
 688/16 689/22 701/6
 701/23 701/25 706/9
 707/1 709/15 712/4
 712/4 714/10 714/12
 715/11 716/8
wouldn't [2] 613/14
 689/24
write [6] 641/20 642/5
 642/8 653/5 677/13
 703/22
writing [4] 653/9
 653/14 659/16 674/15
written [1] 649/25
wrote [2] 642/9 703/18

Y
yeah [5] 607/23 611/3
 617/25 653/23 706/23
year [6] 602/4 646/20
 687/20 687/22 702/13
 702/17
years [1] 604/2
yes [67] 602/19 605/5
 610/9 610/12 612/12
 612/22 613/12 616/25
 621/10 621/23 622/9
 625/15 629/7 630/1
 631/23 637/21 639/15
 639/20 641/9 641/16
 642/13 643/19 644/8
 645/5 647/14 648/21
 649/4 649/7 649/10

649/19 651/17 652/18
 654/2 656/14 657/25
 658/15 659/11 659/20
 660/22 661/13 662/8
 665/9 669/9 669/16
 670/18 674/21 676/9
 679/5 679/15 679/18
 681/5 684/11 684/15
 685/9 687/17 687/18
 688/23 694/10 695/10
 703/14 704/17 713/11
 713/13 713/20 713/20
 713/25 718/3
yesterday [20] 605/6
 605/23 611/8 612/16
 616/5 616/10 618/6
 620/22 621/5 622/20
 623/4 624/4 625/16
 627/19 630/19 639/15
 684/2 684/17 687/2
 718/5
yet [3] 614/19 640/4
 645/7
you [321]
you'd [1] 689/4
You'll [1] 705/22
you're [15] 608/19
 612/7 643/23 644/12
 663/23 693/9 705/15
 705/16 705/21 706/12
 706/13 706/20 713/21
 715/12 718/15
you've [1] 646/20
your [114] 602/3 602/8
 602/13 602/19 604/13
 604/19 605/3 605/5
 607/23 611/23 612/1
 612/19 614/21 616/25
 617/14 617/15 617/17
 618/18 618/25 619/4
 619/8 619/12 619/16
 620/10 620/15 620/17
 622/10 625/13 626/1
 628/19 629/24 642/14
 643/2 643/4 644/17
 646/7 646/20 647/11
 647/13 649/25 650/2
 650/6 651/11 651/18
 651/20 653/20 654/22
 655/17 657/3 657/20
 657/22 658/8 658/22
 659/19 659/20 659/24
 660/8 660/12 660/14
 660/16 663/25 664/10

664/13 665/23 666/4
 666/8 666/15 669/17
 669/19 670/7 676/15
 676/17 677/18 680/7
 680/10 680/23 682/5
 682/25 683/21 683/24
 684/16 686/23 687/3
 687/24 688/22 689/3
 689/8 689/17 692/14
 692/21 692/23 693/12
 693/24 694/6 694/13
 695/25 701/8 703/9
 703/13 704/24 705/2
 705/3 705/7 706/10
 706/24 707/10 707/12
 709/2 711/21 717/3
 717/5 717/25 718/3
 718/18
Your Honor [52] 602/3
 602/8 602/13 602/19
 605/5 607/23 611/23
 612/1 616/25 617/17
 618/18 619/4 619/8
 619/12 619/16 620/17
 625/13 626/1 643/2
 643/4 647/13 651/18
 651/20 657/20 657/22
 658/8 664/10 664/13
 665/23 666/4 666/8
 666/15 669/19 670/7
 676/15 676/17 680/7
 680/10 680/23 683/21
 683/24 689/17 694/13
 695/25 701/8 704/24
 705/7 706/24 707/12
 717/5 717/25 718/18
yourself [1] 714/9
yourselves [1] 602/7

Z
Zelda [1] 600/15
zero [1] 712/19
zoom [27] 622/22
 624/18 628/11 630/7
 632/20 633/22 635/25
 643/8 645/11 649/8
 652/2 653/1 655/6
 659/12 660/7 660/25
 661/15 662/9 667/5
 670/21 672/3 672/25
 674/7 676/24 677/8
 681/19 682/18
zoomed [1] 667/9
zoomed-in [1] 667/9