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

DEPOSITION OF: JULIA FANCELLI

Friday, February 18, 2022

Washington, D.C.

The deposition in the above matter was held via Webex, commencing at 10:12
a.m.

Present: Representatives Aguilar, Lofgren, Murphy, and Raskin.

1

2 Appearances:

3

4

5 For the SELECT COMMITTEE TO INVESTIGATE

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

7

8 [REDACTED] STAFF ASSOCIATE

9 [REDACTED] INVESTIGATIVE COUNSEL

10 [REDACTED] INVESTIGATIVE COUNSEL

11 [REDACTED] STAFF ASSOCIATE

12 [REDACTED] PROFESSIONAL STAFF MEMBER

13 [REDACTED] CHIEF INVESTIGATIVE COUNSEL

14 [REDACTED] PROFESSIONAL STAFF MEMBER

15 [REDACTED] FINANCIAL INVESTIGATOR

16 [REDACTED] SENIOR COUNSELOR TO THE VICE CHAIR

17 [REDACTED] CHIEF CLERK

18 [REDACTED] FINANCIAL INVESTIGATOR

19 [REDACTED] SENIOR INVESTIGATIVE COUNSEL

1

2 For the WITNESS:

3

4 VINCENT A. CITRO, ESQ.

5 JEFF CHILDERS, ESQ,

6 CINDY LEADHOLM, PARALEGAL

7 SUZIE WHITAKER

8 Horwitz & Citro, P.A.

9 17 E. Pine St.

10 Orlando, FL 32801

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2

[REDACTED] This is the deposition of Julia "Julie" Fancelli, conducted by the House Select Committee to Investigate the January 6th Attack on the U.S. Capitol pursuant to House Resolution 503.

5

This will be a staff-led deposition, though members may choose to ask questions.

6

Currently, I don't see any members present.

7

My name is [REDACTED] and I am an investigative counsel with the

8

select committee. With me from the select committee staff are [REDACTED] senior

9

investigative counsel; [REDACTED] financial investigator; [REDACTED]

10

investigator. And we also have, I believe, some other -- we have [REDACTED] here, as

11

well, and [REDACTED] and [REDACTED], all from the committee.

12

Now, under House deposition rules, neither committee members nor staff may

13

discuss substance of testimony today unless the committee approves release. You and

14

your attorney will have the opportunity to review the transcript.

15

Now, under House rules, you may have your attorney present, but counsel for

16

other individuals may not be and therefore are not present. Same with attorneys from

17

other government agencies.

18

At this time, I'd ask that your counsel identify themselves for the record.

19

Mr. Citro. Vincent Citro for Ms. Fancelli. Also with me is my co-counsel.

20

Mr. Childers. Jeff Childers. Good morning.

21

[REDACTED] Good morning.

22

Now, some ground rules for the deposition.

23

We have an official reporter transcribing the conversation. The reporter

24

transcription is the official record of the proceeding.

25

Ms. Fancelli, please wait until each question is completed before you begin to

1 respond, and we will do our best to wait until your response is complete before we ask
2 the next question. The reporter cannot note nonverbal responses such as shaking or
3 nodding your head, so it's important that you respond to each question with an audible,
4 verbal response.

5 And please give complete answers to the best of your recollection. If a question
6 is unclear, please ask for clarification. If you do not know the answer, please just say so.

7 You may refuse to answer a question only to preserve a privilege recognized by
8 the select committee. If you refuse to answer a question based on a privilege, we may
9 proceed with the deposition or seek a ruling from the chairman on the objection. If the
10 chairman overrules the objection, you are required to answer the question.

11 Finally, I remind you that it is unlawful to deliberately provide false information to
12 Congress. Doing so may result in criminal penalties.

13 Because this deposition is under oath, would you please raise your right hand to
14 be sworn?

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

18 The Witness. I do.

19 [REDACTED] Now, Ms. Fancelli, please let us know if you need to take a
20 break or would like to discuss anything with your attorney. We are happy to
21 accommodate.

22 And, just so you know, there may be several people asking questions today. If
23 you don't understand a question, please simply ask the questioner to repeat it.

24 Do you have any questions before we begin?

25 Mr. Citro. On behalf of Ms. Fancelli, I'll point out she does have some back

1 issues, so we might need to take a break from time to time just so that she can stretch.

2 [REDACTED] Of course. That'll be no issue.

3 Ms. Fancelli, any questions before we begin?

4 The Witness. No. Thank you.

5 [REDACTED] Okay.

6 EXAMINATION

7 BY [REDACTED]

8 Q We're going to show you the subpoena issued by the select committee on
9 January 7th, 2022, which has been marked as exhibit 1. I will note that the exhibit
10 contains the subpoena itself, a cover letter from the chairman, a document schedule with
11 production instructions, and a copy of the House rules and regulations regarding
12 conducting depositions.

13 Can you please confirm that you are the Julia "Julie" Fancelli named in this
14 subpoena?

15 Mr. Citro. The screen that we're looking at, that's still relatively small and not
16 very legible. Can you increase the size of that a little more, please?

17 Can you see that?

18 The Witness. Yes.

19 Mr. Citro. Okay.

20 BY [REDACTED]

21 Q So, Ms. Fancelli, can you please confirm that you are the Julia "Julie" Fancelli
22 named in this subpoena?

23 A Yes.

24 Q And do you understand that you are appearing here today pursuant to this
25 subpoena?

1 A Yes.

2 Q Now, this subpoena also required the production of documents described in
3 the schedule attached to the subpoena by January 21st of 2022. Do you understand
4 that?

5 A Yes.

6 [REDACTED] And I'll note for the record that Ms. Lofgren has entered
7 the deposition.

8 BY [REDACTED]

9 Q Now, your counsel delivered a letter to the select committee on or about
10 January 28th, 2022, that you were declining to produce any documents or answer any
11 questions pursuant to the Fifth Amendment.

12 To that point, the select committee is not aware of any basis for you to decline to
13 produce each and every document that would be called for by the subpoena.

14 Further, the select committee is of the view of the need for you to sit for your
15 deposition and assert objections on a question-by-question basis. My goal today is to
16 ask questions relevant to the select committee's investigation, with the hope that you will
17 answer.

18 If you have an objection or a privilege assertion, we'll ask that you assert it for the
19 record. I will seek to clarify the basis for each objection.

20 And I understand from your counsel that you intend to assert the Fifth
21 Amendment to each and every question I ask. Be that as it may, I will say that our goal
22 is to understand the basis for your objection and fairly evaluate it. Ultimately, the more
23 detail you can provide about the basis for the Fifth Amendment objection, the easier it
24 will be for the select committee to consider the objections.

25 Now, Ms. Fancelli, can you please provide your full name?

1 A Julia Jenkins Fancelli.

2 Q And what's your date of birth?

3 A [REDACTED]

4 Q And can you provide the address where you reside?

5 A [REDACTED]

6 Q And can you provide your email address that you used from December of
7 2020 to January of 2021?

8 A I decline to answer pursuant to the rights afforded to me under the
9 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

10 Q Can you provide -- did you have an Instagram or a Twitter account from
11 December of 2021 to January of 2021?

12 A I decline to answer pursuant to the rights afforded to me under the
13 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

14 Q Now, Ms. Fancelli, your position appears to be that you've not done anything
15 wrong. Is that accurate?

16 A I decline to answer pursuant to the rights afforded to me under the
17 Constitution, including the First, Fourth, Fifth, and 14th Amendment.

18 Q Now, do you understand, with regard to the Fifth Amendment, that it
19 protects your right to refuse to answer questions if the truthful answers would be
20 incriminating -- in other words, that by telling the truth today, you are being made a
21 witness against yourself for previous conduct, for which you reasonably believe you could
22 be prosecuted?

23 A I decline to answer pursuant to the rights afforded to me under the
24 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

25 Q Is it your position that answering basic questions, such as with regard to your

1 social media accounts or your email address, would be incriminating for past conduct?

2 A I decline to answer pursuant to the rights afforded to me under the
3 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

4 Q Now, Ms. Fancelli, we will note that all we want is the truth. Do you
5 understand -- excuse me one second. I'm sorry.

6 Pursuant to the subpoena, you have been required to produce certain documents
7 in your possession. Did you search for or locate any documents called for by the
8 subpoena?

9 A I understand with regard to the production of the items, my counsel has
10 invoked my constitutional rights in a letter to the committee. That remains my position
11 today.

12 Q Is it your position that even the act of searching for or identifying documents
13 responsive to the subpoena would implicate your Fifth Amendment privilege against
14 self-incrimination?

15 A I understand with regard to the production of items, my counsel has invoked
16 my constitutional right in a letter to the committee. That remains my position today.

17 Q Now, Ms. Fancelli, am I to understand that you're refusing to answer
18 questions today based on First Amendment grounds?

19 A I decline to answer pursuant to the rights afforded to me under the
20 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

21 [REDACTED] I will note for the record that Mrs. Murphy has joined the
22 deposition.

23 BY [REDACTED]

24 Q Ms. Fancelli, the First Amendment guarantees freedom of religion,
25 expression, speech, assembly, and to petition the government for grievances.

1 Today's deposition was called for the purposes of fact-finding. The information
2 we are seeking is necessary to help the committee gain a better understanding of the
3 planning and organization of the rallies that led to the events on January 6th. And I am
4 struggling to see how the First Amendment relates to the questions that are pending
5 before you.

6 But, in the interest of overcoming your concern, I will rephrase the question. Did
7 you or your counsel search for any documents -- or, did you or your counsel identify any
8 documents that would be called for to be produced by the subpoena?

9 A I decline to answer pursuant to the rights afforded to me under the
10 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

11 Q As I stated before, today's deposition is part of the committee's ongoing
12 oversight of respecting associational rights while preventing the foment of violence -- of
13 actions that lead to violence. The information sought is critical to the committee's
14 oversight work.

15 Do you still contend that answering my questions would undermine your First
16 Amendment protections?

17 A I decline to answer pursuant to the rights afforded to me under the
18 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

19 Q Now, Ms. Fancelli, I would ask that you state the specific grounds for your
20 assertion of a First Amendment privilege and, in doing so, would ask you to explain how
21 answering the committee's questions would violate one or more specific protections
22 afforded under the First Amendment of the U.S. Constitution.

23 A I decline to answer pursuant to the rights afforded to me under the
24 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

25 Q So, Ms. Fancelli, I'll ask that you state the specific grounds for your assertion

1 of a 14th Amendment privilege and, in doing so, would ask that you explain how
2 answering the committee's questions would violate one or more specific protections
3 afforded under the 14th Amendment of the U.S. Constitution.

4 A I decline to answer pursuant to the rights afforded to me under the
5 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

6 Q Ms. Fancelli, I would again ask that you state the specific grounds for your
7 assertion of a Fourth Amendment privilege and, in doing so, would ask for you to explain
8 how answering the committee's questions would violate one or more specific protections
9 afforded under the Fourth Amendment of the U.S. Constitution.

10 A I decline to answer pursuant to the rights afforded to me under the
11 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

12 Q Okay. Ms. Fancelli, we note your objections for the record, and we're going
13 turn to the questions that we have for you.

14 We're going to start with your introduction to the rally on the 6th. How did you
15 first hear about an event on January 6th?

16 A I decline to answer pursuant to the rights afforded to me under the
17 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

18 [REDACTED] Ms. Fancelli, if I could interrupt for a moment, I just want to make
19 clear for the record, is it your intention to object on the grounds of all of the portions of
20 the Constitution regardless of whether they in fact apply to a specific question?

21 Mr. Citro. No.

22 The Witness. No.

23 [REDACTED] So you are specifically thinking of which amendment to the
24 Constitution you are using when objecting to each of these questions?

25 The Witness. Yes.

1

BY [REDACTED]

2

Q What did you understand to be the purpose of the event on January 6th?

3

A I decline to answer pursuant to the rights afforded to me under the

4

Constitution, including the First, Fourth, Fifth, and 14th Amendments.

5

Q How do you know a woman named Caroline Wren?

6

A I decline to answer pursuant to the rights afforded to me under the

7

Constitution, including the First, Fourth, Fifth, and 14th Amendments.

8

Q Now, Ms. Wren assisted your efforts to provide funding for an event on

9

January 6th on the White House Ellipse, correct?

10

A I decline to answer pursuant to the rights afforded to me under the

11

Constitution, including the First, Fourth, Fifth, and 14th Amendments.

12

Q At this time, we're going to show you what's been marked as exhibit 2.

13

Now, exhibit 2 is an email, a December 22nd email --

14

Mr. Citro. Sorry to interrupt. We don't have anything up on our screen.

15

We're still seeing the three of you.

16

[REDACTED] Oh. Yeah. Sorry.

17

Mr. Citro. That's okay.

18

[REDACTED] Is that clear? Is that zoomed in enough for you?

19

Mr. Citro. No.

20

Okay. Yep. Perfect. Thank you.

21

BY [REDACTED]

22

Q Okay. And going to the bottom of that page -- oh, excuse me, the top of

23

the page -- my apologies -- it is an email from Caroline Wren to Schuyler Long.

24

Ms. Fancelli, was December 22nd on or about the time you first spoke to Ms.

25

Wren about an event on January 6th?

1 A I decline to answer pursuant to the rights afforded to me under the
2 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

3 Q And I will note that Schuyler Long is your personal assistant, correct?

4 A I decline to answer pursuant to the rights afforded to me under the
5 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

6 Q And I will note that Ms. Wren writes to Ms. Long, "I wanted to follow up with
7 you regarding the Million MAGA March on January 6th. I put together the attached
8 proposal for you to review with Julie regarding different options to help with travel
9 logistics and to increase attendance."

10 Now, did you review the propose proposal that Ms. Wren emailed to Ms. Long?

11 A I decline to answer pursuant to the rights afforded to me under the
12 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

13 Q I'm going to turn to what's been marked as exhibit 3, which is the proposal
14 that Ms. Wren attaches.

15 Now, did Ms. Wren contact you first regarding the event, or did you contact her
16 first?

17 A I decline to answer pursuant to the rights afforded to me under the
18 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

19 Q And did you always understand that the event involved a march?

20 A I decline to answer pursuant to the rights afforded to me under the
21 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

22 Q Now, what did you understand to be Ms. Wren's relationship with the Trump
23 reelection campaign or the White House?

24 A I decline to answer pursuant to the rights afforded to me under the
25 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

1 Q Now, scrolling to page 2 of this document, I will show you for the record that
2 it includes budget proposals from Ms. Wren. Did you review these budget proposals
3 when Ms. Wren provided them to Ms. Long?

4 A I decline to answer pursuant to the rights afforded to me under the
5 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

6 Q I'm going to next turn to what's been marked as exhibit 4. Now, exhibit 4, I
7 will represent to you, are text messages between you and Caroline Wren. And Ms.
8 Wren is on the right, and your messages are on the left.

9 I will just note for the record that under December 23rd there's a message that
10 says, "Hey! Call me! j," with emojis following. And on December 24th there's a message
11 from you that indicates, "Merry Christmas! Call me when you can!", also with emojis
12 following.

13 And then scrolling down to the page ending in Bates numbers 413, indicates a
14 message from you that says, "Love it!! When can I talk to you about DC? Are you coming
15 here tomorrow? Hope you are having a great XMAS? You might be coming tonight?"

16 And then Ms. Wren responds, "I can come tomorrow morning!! Does that work
17 for you?" And then you respond, "Sure! What time?" And that's under December
18 25th.

19 And on December 26th at 7:21 a.m., Ms. Wren texts, "Does 10am work?" And
20 you respond, "That will be fine!" And Ms. Wren responds, "Great! What is your
21 address?"

22 Did Ms. Wren visit you in person to discuss the January 6th event on or about
23 December 26th of 2020?

24 Mr. Citro. Before Ms. Fancelli answers the question, the exhibit, at least on our
25 end -- and I want to make sure this is intended and not a technical glitch. There's a

1 number of what appears to be large blacked-out portions of text messages. Is
2 that -- but some are not. Was it intended to have those redacted?

3 [REDACTED] Those are intended redactions on matters that are not
4 relevant to the committee's inquiry.

5 Mr. Citro. Thank you.

6 The Witness. I decline to answer pursuant to the rights afforded to me under
7 the Constitution, including the First, Fourth, Fifth, and 14th Amendments.

8 [REDACTED] Can we -- just for a second. We'd like to clarify, just also in the
9 interest of time, exactly which pieces of these amendments are being invoked. Because
10 you're, kind of, blanket invoking for every question.

11 So, if this is a question for your attorneys, that's fine, but we'd like to clarify, as to
12 the First, Fourth, Fifth, and 14th, exactly what are you invoking? And then, that way,
13 maybe we can use a shorthand going forward. Otherwise, I fear we'll be here for a
14 while.

15 So perhaps you could explain the bases on which you're objecting to every single
16 question using these four amendments.

17 Mr. Citro. I think, by necessity, we'll end up being here for a while.

18 [REDACTED] No, no, that's fair. I still think we need to make a record for the
19 purposes of what legal processes come next. The blanket invocation to each question of
20 the First, Fourth, Fifth, and 14th I'm not sure is legally sufficient.

21 Mr. Citro. We understand your position.

22 [REDACTED] Okay.

23 [REDACTED] If I can maybe ask more concretely on that -- Vince, can you see me?

24 Mr. Citro. Yeah, I can see you, [REDACTED]

25 [REDACTED] Can you just -- there are several rights under the First Amendment,

1 and there are lots of pieces to the 14th Amendment. Could you clarify your best
2 understanding of which pieces of the First Amendment and which parts of the 14th
3 Amendment are being invoked?

4 Mr. Citro. We can do that offline, if you'd like.

5 [REDACTED] Well, I think that the point is to create a record of that so that it's
6 clear, as [REDACTED] said, moving forward, what comes next.

7 So, I mean, obviously, I think that -- we just -- if it's necessary for us to do
8 something about this going forward to understand the contours of which rights are being
9 invoked, that's something that we want to understand.

10 So is it the First Amendment's right to freedom of expression?

11 Mr. Citro. Well, it's the entirety of the rights afforded under the First, Fourth,
12 Fifth, and 14th amendments. And so anything more than that we could discuss
13 afterwards, but, for today, that is going to be at least the answers you've received so far
14 to the questions that have been asked so far. I don't know the questions coming, so I
15 don't know that that will be the answer forthcoming for the future questions.

16 [REDACTED] Well, so the First Amendment establishes, you know, the
17 Establishment Clause having to do with government interaction with religion. Is that
18 being invoked? You said the entirety of the First Amendment.

19 Mr. Citro. I'm not going to get into this in a deposition setting. So I've given
20 you the answer. I appreciate that you want to continue to ask. We'll continue to
21 decline in this setting.

22 [REDACTED] Okay.

23 Well, so, then the issue of the shorthand, I think, assuming that when Ms. Fancelli
24 says invoking the rights under the First, Fourth, Fifth, and 14th Amendment, that every
25 single time she says that she means the exact same thing every time, maybe there is a

1 way to shorten that so that we can move more quickly.

2 Mr. Citro. That's fine. I'm open to any suggestion you have as to a shorthand.
3 I don't think that's a problem.

4 [REDACTED] Okay. I think whatever shorthand you are comfortable with her
5 using is appropriate, just so long as we're of the understanding that it means the exact
6 same thing that she's already been saying every time.

7 Mr. Citro. Okay. So then why don't we just do this? I'll have Ms. Fancelli
8 simply say, "I'm invoking." And without any objection, we'll understand that that means
9 the answer that's been previously given is the one that's being given. And to the extent
10 that we need to change that, she'll specifically address it, but I think just "I'm invoking,"
11 unless you all have an objection, should be sufficient.

12 [REDACTED] But the only question that I have is that I just want to make sure that
13 I'm understanding right that the 14th Amendment that applies to the States and not the
14 Federal Government is the one that you're invoking for every one of these questions?

15 Mr. Citro. We're invoking the 14th Amendment.

16 [REDACTED] And so, when you say we're invoking, your intention is to invoke the
17 First, Fourth, Fifth, and 14th for every single question she's being asked every time she
18 says --

19 Mr. Citro. To which she would reply -- that's correct, to which she would reply,
20 "I'm invoking." And then, to the extent there is something different than that, she will
21 articulate that specifically. I think that probably gets to [REDACTED] issue and your issue.

22 [REDACTED] Okay. We -- and I understand. We just need to make it clear for
23 the record so that it's abundantly clear exactly what she is objecting to and the basis on
24 which she's objecting.

25 And, obviously, in the interest of time, if there's a way to streamline that, we want

1 to. We just wanted to make sure we understood exactly which amendments and the
2 parameters of that.

3 So, if I understand it, it's every possible right under those amendments and it's the
4 First, Fourth, Fifth, and 14th every time she says "I'm invoking." Do we have that
5 correct?

6 Mr. Citro. That is correct.

7 [REDACTED] Okay.

8 Mr. Citro. Do you understand?

9 The Witness. Uh-huh. Yes, I understand.

10 BY [REDACTED]

11 Q Going to -- on the same exhibit, if we could scroll down, you'll see that on
12 December 26th at 9:04 a.m., Ms. Wren says, "I'm still about 25 minutes out."

13 And at 1:30 p.m., she seems to send you a contact for an individual named Charlie
14 Kirk and says, "I spoke to Charlie Kirk he had some fabulous ideas he's going to call you
15 this afternoon if you want to save his number."

16 And later it says, "Charlie tried calling you went to vm," which I assume is
17 voicemail, and she provides a number.

18 Are you familiar with Charlie Kirk, who that is?

19 A I invoke.

20 Q And are you familiar with Charlie Kirk's organization, Turning Point?

21 A I invoke.

22 Q I'm going to scroll down a little further where you respond to Ms. Wren, and
23 you say, "Hey! Sorry I was out walking with no phone! Can you two call now? Or should I
24 try him? Guess I am acting like Alex."

25 Who is the Alex that you're referencing there?

1 A I invoke.

2 Q Is that Alex Jones?

3 A I invoke.

4 Q In the next message you send, you said, "Hey! Just talked to Charlie! Great
5 person. I've followed him ever since he got beat up on campus years ago. You two work it
6 out with Marianne, but keep me in the loop."

7 A I in- --

8 Q Is that "Marianne" Marianne Parsons, the president of LJ Management
9 Services?

10 A I invoke.

11 Mr. Citro. Now, you just -- hang on one second.

12 [Discussion off the record.]

13 Mr. Citro. I just reminded Ms. Fancelli to permit you all, to the extent it's
14 discernible, to finish your question before she answers, for the court reporters.

15 [REDACTED] Vince, I'm sorry. Would you mind just repeating what
16 you just said?

17 Mr. Citro. Sure. We just went off for a second so I could remind Ms. Fancelli,
18 to the extent we can over this connection, to let you finish your question before she
19 provides you an answer, for the benefit of the court reporters.

20 [REDACTED] We appreciate that. Thank you.

21 BY [REDACTED]

22 Q Just to be clear, Ms. Fancelli, Marianne Parsons -- "Marianne" there
23 referenced is Marianne Parsons who works for you, correct?

24 A Yes.

25 Q And Marianne Parsons is the president of LJ Management Services, correct?

1 A Yes.

2 Q And LJ Management Services is your family office?

3 A Yes.

4 Q And when you tell Ms. Wren that "you two work it out with Marianne," does
5 that have to do with a donation to Turning Point?

6 A I invoke.

7 Q Now, what did you and Ms. Wren discuss at your January 26th in-person
8 meeting regarding the event on January 6th?

9 A I invoke.

10 Q Did Ms. Wren indicate that Charlie Kirk and Turning Point already had plans
11 for January 26th?

12 A I invoke.

13 Q How many in-person meetings did you have with Ms. Wren regarding
14 January 6th?

15 A I invoke.

16 Q And how often did you speak with Ms. Wren between December 22nd and
17 January 6th?

18 A I invoke.

19 [REDACTED] Ms. Fancelli, if Ms. Wren characterized your conversations as it was
20 your idea to donate money to have a large event for President Trump on January 6th,
21 would you agree or disagree with that --

22 The Witness. I --

23 [REDACTED] -- characterization?

24 The Witness. I invoke.

25 Mr. Citro. Make sure you let them answer the question.

1

BY [REDACTED]

2

Q I'm going to turn to exhibit 5, which are text messages between Charlie Kirk

3

and Ms. Wren that occur while you are with Ms. Wren at what we believe is your home.

4

I'm going to scroll to page 3.

5

Wait. I think up. Hold on. Up. Sorry.

6

Is this exhibit 5? Oh, no, no, it's fine. She has to scroll through all of them.

7

Okay. So, starting here, it's a text message on December 26th, which is when

8

Ms. Wren was with you -- we'll start with December 23rd. Excuse me.

9

Mr. Kirk texts Ms. Wren, "Did you friend give us \$?"

10

And then Ms. Wren responds, "I'm actually sitting with her now. Are you'll doing

11

any sort of effort to bring folks out to DC for January 6 protest?" "Call me if you can

12

she's ready to invest."

13

Mr. Kirk responds, "Nothing for Jan 6. Can call soon."

14

Did you and Ms. Wren have conversations about a protest on January 6th during

15

that meeting?

16

A I invoke.

17

Q And did you discuss your intention for -- to draw -- to increase turnout for a

18

protest on January 6th?

19

A I invoke.

20

Q And did you express to Ms. Wren you'd be willing to invest money to

21

increase turnout for protesters on January 6th?

22

A I invoke.

23

[REDACTED] Can we scroll up for a moment to December 15th?

24

[REDACTED] Yeah. That's on my list.

25

[REDACTED] Are you going to that?

1 [REDACTED] Yeah.

2 [REDACTED] Apologies. Never mind.

3 [REDACTED] No, no. That's good.

4 BY [REDACTED]

5 Q We're going to give you -- this is a text Ms. Wren sent to Charlie Kirk before
6 your meeting.

7 On December 15th, she says, "Do you know Julie Fancelli? Heir to Publix. She's
8 given Trump around \$2 million. I just spoke to her she LOVES YOU (listens to all your
9 podcasts) and she's going to come Thursday-Sunday for SAS. I need wire transfer info, I
10 was going to tell her to send you \$50K today and then if you need to meet with her for
11 5 mins at some point and she would do minimum \$250K guaranteed."

12 Mr. Kirk responds, "Oh wow!" "No I don't!" "Will she do c3 or c4?" "And
13 that's awesome!"

14 Ms. Wren responds, "She doesn't care."

15 And Mr. Kirk responds, "Pls make sure I meet with her." "Its epic."

16 Did you express to Ms. Wren that you were willing to provide a minimum of
17 \$250,000 in mid-December to Charlie Kirk?

18 A I invoke.

19 Q Did you express to her that you love him and listen to all his podcasts?

20 A I invoke.

21 [REDACTED] Is it your understanding when Mr. Kirk says "will she do c3 or c4" that
22 he's referring to whether you would donate to his 501(c)(3) organization or his 501(c)(4)
23 organization?

24 The Witness. I invoke.

25 BY [REDACTED]

1 Q And did you tell Ms. Wren that you didn't care whether it was a (c)(3) or a
2 (c)(4) organization?

3 A I invoke.

4 Q I'm turning to -- well, you can take that off, [REDACTED] Thank you.

5 Now, after your meeting with Ms. Wren in December 2020, you agreed to provide
6 funding for an event on January 6th in Washington, D.C., correct?

7 A I invoke.

8 Q Now, why did you want to fund the event on January 6th?

9 A I invoke.

10 Q Was it to draw a crowd to Washington, D.C.?

11 A I invoke.

12 Q Was it to increase turnout for an event that was happening on January 6th?

13 A I invoke.

14 Q And what did you understand to be the significance of January 6th as a date?

15 A I invoke.

16 Q Did you understand that that was the day that Congress would be certifying
17 the election results?

18 A I invoke.

19 Q What did you hope that spending money on that event would accomplish?

20 A I invoke.

21 [REDACTED] Ms. Fancelli, you were a fan of Alex Jones's podcasts, correct?

22 The Witness. I invoke.

23 [REDACTED] In fact, did you tell Ms. Wren that you were a huge fan and that you
24 had listened to his podcasts often?

25 The Witness. I invoke.

1 [REDACTED] Had you heard Mr. Jones talk about what he anticipated happening
2 on January 6th?

3 The Witness. I invoke.

4 Mr. Citro. [REDACTED] could I just -- could I take one second real quick, please?

5 [REDACTED] Sure.

6 Mr. Citro. All right.

7 [Discussion off the record.]

8 Mr. Citro. Thank you, [REDACTED]

9 [REDACTED] Any time you need a break, please don't hesitate to let us know.

10 The Witness. Thank you.

11 BY [REDACTED]

12 Q Ms. Fancelli, have you heard of a man named Taylor Budowich?

13 A I invoke.

14 Q Are you familiar that Mr. Budowich is currently a spokesman for President
15 Trump?

16 A I invoke.

17 Q And are you aware that Mr. Budowich worked with Ms. Wren regarding the
18 January 6th rally at the White House Ellipse?

19 A I invoke.

20 Q I'm going to show you what has been marked as exhibit 6, which are text
21 messages between Caroline Wren and Taylor Budowich.

22 Starting with the page that ends with Bates number 724, on Saturday, December
23 26th, which is the date that Ms. Wren was at your home, Ms. Wren texts, "I'm at Julie
24 Fancelli's." "Guess what the budget is she just gave me for our bus project?" "You
25 won't guess." "\$3 million..."

1 And Mr. Budowich responds with several "lol"s and says, "probably could do it for
2 3."

3 And then Ms. Wren responds, "we can use some for save the us senate." "I'll call
4 you when I leave here." And then turning to the next page, she says, "she wanted to
5 just wire me the 3 mill lol."

6 And Mr. Budowich responds, "rich people are so odd."

7 Now, at the December 26th meeting you had with Ms. Wren, did you give her the
8 amount you'd be willing -- did you tell her you'd be willing to spend \$3 million on an
9 event on January 6th?

10 A I invoke.

11 Q And did you offer just to wire \$3 million directly to Ms. Wren?

12 A I invoke.

13 Q Now, you understood that your donation would be used, in part, to bus
14 people to Washington, D.C., correct?

15 A I invoke.

16 ██████████ Was it your understanding that it was important to pay for buses so
17 that you could build large crowds at the event on January 6th?

18 The Witness. I invoke.

19 ██████████ Did you have discussions about the importance of crowd-building
20 with Ms. Wren, Mr. Kirk, or anyone else that you talked with in the planning of
21 January 6th?

22 The Witness. I invoke.

23 ████████████████████ Now, eventually, you agreed to fund various groups
24 involved with January 6th as opposed to one single transfer of funds, correct?

25 The Witness. I invoke.

1 [The witness coughs.]

2 [REDACTED] Ms. Fancelli, do you need us to take a break? Are you okay?

3 The Witness. No, it's okay. It's okay. [REDACTED]

4 [REDACTED] Now, did the idea to fund the January 6th event by
5 transferring money to various groups, did that come from Ms. Wren or from you?

6 The Witness. I invoke.

7 [REDACTED] Did Ms. Parsons suggest that fund transfer to different political
8 groups or organizations?

9 The Witness. I invoke.

10 [REDACTED] Was that transfer done to obscure the source of the
11 funds?

12 The Witness. I invoke.

13 [REDACTED] Did Ms. Wren say anything to you about why she chose the
14 organizations she chose to park the money with, as she said?

15 The Witness. I invoke.

16 [REDACTED] Did you object to any of the organizations that she proposed to you in
17 terms of where to put the money in preparing the January 6th event?

18 The Witness. I invoke.

19 [REDACTED] Now, in late December of 2020, did you request that Ms.
20 Wren provide you with a proposed budget for the event?

21 The Witness. I invoke.

22 [REDACTED] Did Ms. Parsons request that Ms. Wren submit a budget that she
23 could review on your behalf?

24 The Witness. I invoke.

25 [REDACTED] Was it Ms. Parsons' job, in fact, to review budgets like that for you

1 before funds were expended from LJ Management?

2 The Witness. I invoke.

3 [REDACTED] Now, Ms. Fancelli, you earlier said that LJ Management is
4 your family office. Are you aware that LJ Management has produced documents to the
5 committee?

6 The Witness. Yes.

7 [REDACTED] I'm going to show you a document that was produced by
8 LJ Management to the committee, which ends with Bates numbers 64. It's LJMI 64.

9 Now, we're going to start at the last page.

10 [REDACTED] Do you need us to zoom in further? Is that big enough?

11 Mr. Citro. Is that -- can you see that?

12 The Witness. Yeah. That's fine.

13 Mr. Citro. Thank you.

14 [REDACTED] And the first email is from -- if you go down more, further
15 down. Down, down, down. Yeah. Up, up. Yeah, right there. Thank you.

16 It's an email from Caroline Wren to you, Julie Fancelli, and it copies Marianne
17 Parsons and Ms. Long, with the subject line "Million MAGA March."

18 And it says, "Attached please find the proposed budget, contribution information,
19 agenda and flight details for the upcoming trip to Georgia and Washington, DC. I will
20 work with Schuyler and Marianne to get all this executed with your approval."

21 Is this the budget for your donations related to January 6th?

22 The Witness. I invoke.

23 [REDACTED] Was this -- go ahead.

24 [REDACTED] No, go ahead.

25 [REDACTED] Was this the initial budget that Caroline put together at your request

1 for the donation that you were going to give her for the event on January 6th?

2 The Witness. I invoke.

3 Ms. Wick. Is there any reason to believe that [REDACTED] is not, in
4 fact, your email address?

5 The Witness. I invoke.

6

BY [REDACTED]

7 Q Did you review documents that LJ Management provided to the committee
8 before they were provided?

9 A No.

10 Q Did you discuss with Ms. Parsons what documents would be turned over to
11 the committee?

12 A No.

13 Q Is there any reason to think that documents provided by LJ Management
14 Services to the committee are not accurate and true?

15 A I have no idea.

16 Q Does Ms. Parsons work for you?

17 A Yes.

18 Q Did you know that LJ Management was cooperating with the committee?

19 A Yes.

20 Q Did you expect LJ Management to provide truthful information to the
21 committee?

22 A Yes.

23 Q So, then, it's fair to say that documents provided to the committee by LJ
24 Management Services would be true and accurate?

25 A I have no idea.

1 Q We're going to turn to the first page of this document, which is an email
2 from Ms. Parsons --

3 [REDACTED] Hold on a second.

4 [REDACTED] Yeah.

5 [REDACTED] Ms. Fancelli, do you recall -- before we go on, do you recall receiving
6 the email that we just showed you addressed to [REDACTED]

7 The Witness. I invoke.

8 [REDACTED] And this is an email on December 28th, 2020, at 7:42 p.m.
9 In response to Ms. Wren's email we just read, Ms. Parsons writes, "Caroline -- Julie and I
10 went through the budget and discussed each line item and considered what we know
11 about each organization. Attached is the revised amounts Julie would like to provide
12 with discussion below."

13 You discussed the budget you received from Ms. Wren with Ms. Parsons, correct?

14 The Witness. I invoke.

15 [REDACTED] Now, Ms. Parsons wouldn't say she discussed something
16 with you that she didn't, right?

17 The Witness. I don't know. I have no idea.

18 [REDACTED] But you hired Ms. Parsons to manage LJ Management for you. Did
19 you have reason to believe that she would lie in documentation or make false
20 statements?

21 The Witness. I have no idea.

22 BY [REDACTED]

23 Q Do you find Ms. Parsons to be a truthful person?

24 A Yes.

25 Q And you've worked with her for many years, correct?

1 A Yes.

2 Q And she's the president of the company that manages your financial
3 holdings, correct?

4 A Yes.

5 Q And you trust her, correct?

6 A Yes.

7 Q And you find her to be a truthful and honest person, correct?

8 A Yes.

9 Q Now, scrolling down further, Ms. Parsons indicates, "Attached is the revised
10 amounts Julie would like to provide with discussion below."

11 "Turning Point - we are still in for \$1 million. But if Charlie feels he can
12 legitimately fund" --

13 You know, actually, before we do this, I'm actually going to turn -- excuse me -- to
14 the proposal first before we get there, which is exhibit 8, so we can see what Ms. Wren
15 initially proposed.

16 So this is the document that Ms. Wren attached. It's Bates stamped LJMI 8. At
17 the top of the page, it says, "FANCELLI BUDGET & TRIP PLAN, MONDAY, JANUARY
18 4 -- WEDNESDAY, JANUARY 6, 2001 [sic]."

19 [REDACTED] 2021.

20 BY [REDACTED]

21 Q "2021." Excuse me.

22 Is this the budget trip plan that you reviewed with Ms. Parsons?

23 A I invoke.

24 Q And this budget and plan lays out an agenda for you to travel from Lakeland,
25 where your home is, to Washington, D.C., correct, around January 6th?

1 A It speaks for itself.

2 Mr. Citro. You can say that.

3 The Witness. It speaks for itself.

4

BY [REDACTED]

5 Q That I do agree.

6 Going to the next page in this document, as you can see there, by my count, there
7 are 10 line items on this budget.

8 This is a budget that you reviewed with Ms. Parsons, correct?

9 A I invoke.

10 Q Well, this is a budget that Ms. Wren provided you to review with -- for
11 possible donations, correct?

12 A I invoke.

13 Q All right. I want to draw your attention to one line item here. Do you see
14 where it says "Bluebonnet Fundraising LLC"?

15 A Yes.

16 Q Now, that's Ms. Wren's company, correct?

17 A I invoke.

18 Q And, if you look to the right, it says what this is for. And it says, "This
19 payment is to retain Caroline Wren's services including overseeing the budget, event
20 organization, travel logistics and donor advisement. The budget is built to scale pending
21 subcontractors that may be needed to assist with the execution and logistics of the
22 rallies."

23 You're the donor that's mentioned there, right?

24 A I don't know.

25 Q Well, here, there's -- it's the "Fancelli Budget & Trip Plan" at the top, and it

1 indicates that Bluebonnet Fundraising/Ms. Wren is being paid to advise the donor. So
2 you would be the donor, correct?

3 A This speaks for itself.

4 [REDACTED] In the description that Ms. Wren provided to you justifying the cost of
5 her services, it says, "The budget is built to scale pending subcontractors that may be
6 needed to assist with the execution and logistics of the rallies."

7 Which rallies did you understand her to be referencing to there?

8 The Witness. I invoke.

9 [REDACTED] At that point in time, were you aware that there were going to be
10 multiple rallies on or around January 6th?

11 The Witness. I invoke.

12 [REDACTED] Did you know whether Ms. Wren was receiving additional
13 compensation outside of \$50,000 that you were paying her?

14 The Witness. I don't know.

15 BY [REDACTED]

16 Q Did Ms. Wren make any representations to you whether the \$50,000 was
17 the only money that she would be making off of the \$3 million you were intending to
18 donate?

19 A I don't know.

20 Q No, let me restate the question. Did Ms. Wren make any representations
21 to you, meaning did she say anything to you that suggested that the \$50,000 was the only
22 money that she would make off of your \$3 million donation?

23 A I don't know.

24 Q What I'm trying to figure out --

25 A I can't remember. I can't remember.

1 Q You can't remember?

2 A No.

3 Q Okay. You can't remember whether she made any representations like
4 that to you during your conversations?

5 A No. I can't remember.

6 Q Okay. That's very helpful. I want to distinguish between whether you
7 don't understand the question or whether you understand the question and you can't
8 remember, because it's an important distinction.

9 A I can't remember, truly.

10 Q Thank you.

11 Did you and Ms. Parsons have any conversations in terms of what you were okay
12 with Ms. Wren making in terms of how much she could make off of your \$3 million
13 donation?

14 A No.

15 Q Okay.

16 Mr. Citro. Remember, let them finish the question.

17 The Witness. Oh.

18 [REDACTED] If you answer before we finish and then you want to change your
19 answer, please just, like, tell us, and we can restate the question and let you finish your
20 answer.

21 The Witness. Okay. Restate that question, then.

22 [REDACTED] I actually forgot in the time I asked it.

23 Mr. Citro. Let's just move on.

24 [REDACTED] Yeah, yeah. I think we're doing fine. I think the record
25 was clear.

1 Mr. Citro. I was simply making the point because of the lag that she needed to
2 let you guys finish before she answers. I want to make sure the court reporter gets
3 everything.

4 [REDACTED] Yeah. And, Vincent, I just want to make sure she knows that, if
5 something happens after and she needs to change it, she's not stuck in the answer. She
6 should feel free to clarify.

7 The Witness. Thank you.

8 Mr. Citro. She knows. We've made her aware.

9 [REDACTED] Okay.

10 [REDACTED] And I'll note here in this proposal that it indicates that
11 there's \$200,000 requested for "Speakers Fees/Speakers Travel," and it says, "This is
12 money we are holding back to help assist VIP speakers that will need potential speakers
13 fees, flights, lodging, etc."

14 Do you recall discussing whether speaker fees would be needed with Ms. Parsons?

15 The Witness. Can you stop him?

16 Mr. Citro. Yeah.

17 Give me one second. And, also --

18 The Witness. Can I speak with my attorney a minute?

19 [REDACTED] Sure.

20 Mr. Citro. And, also, if you could move that over, because we can't read the full
21 description.

22 The Witness. I can't read it all.

23 Mr. Citro. It cuts off.

24 [REDACTED], can you -- perfect.

25 Is that better?

1 Mr. Citro. Yeah, that's better. Thank you.

2 [REDACTED] Okay.

3 Mr. Citro. All right. Is there any chance you can increase it, the font size, or
4 zoom just a little bit?

5 The Witness. I can get my glasses on.

6 Mr. Citro. On the right, where it's got the text in that final column is a little
7 smaller than the rest.

8 [REDACTED] Is that better?

9 Mr. Citro. Yes. Thank you.

10 [REDACTED] Yeah, no problem.

11 The Witness. Now, where are we?

12 Mr. Citro. Okay. And which one were you referring to in the last question?
13 The one that starts with "These funds will assist"?

14 [REDACTED] Yeah. It's being highlighted there.

15 Mr. Citro. Gotcha. Thank you.

16 All right, if you wouldn't mind just asking that question again.

17 The Witness. Yes, please.

18 BY [REDACTED]

19 Q On the left, that line item is for \$200,000, I will note.

20 A Okay.

21 Q Did you have conversations with Ms. Parsons about whether funds would be
22 needed for speakers' fees for the January 6th events?

23 A I don't remember.

24 Q All right. I want to turn back to exhibit 7, which is the email Ms. Parsons
25 sends Ms. Wren in response to this budget.

1 Right here. There you go.

2 So Ms. Parsons begins with Turning Point, and she says, "Turning Point - we are
3 still in for \$1 million. But if Charlie feels he can legitimately fund \$250,000 from Turning
4 Point USA, Charlie's 501(c)(3) organization, we will do that, then give \$750,000 to Turning
5 Point Action. It is just good fiscal stewardship. Please send me Charlie's phone
6 number and I will call him first thing in the morning to discuss with him."

7 Did you and Ms. Parsons talk to Charlie Kirk the next morning about this donation?

8 A No. I didn't.

9 Q Did you understand Ms. Parsons had talked to him about effectuating the
10 donation?

11 A Don't know.

12 Q Did you expect that she would talk to him about the donation?

13 A I don't know.

14 [REDACTED] Did Ms. Parsons have the ability to unilaterally decide how to spend
15 \$3 million of your money without your input?

16 The Witness. No.

17 [REDACTED] Would she have been able to make these wires without your
18 permission or consent?

19 The Witness. No.

20 [REDACTED] Did you have to approve this --

21 Mr. Citro. Hold on, hold on, hold on one second.

22 [Discussion off the record.]

23 Mr. Citro. Okay. So clarify that answer as to whether she could do it without
24 your assistance.

25 The Witness. She could do it without my assistance.

1 [REDACTED] Now, when you say she could do it, you mean in a
2 logistical sense without your assistance, correct?

3 The Witness. Yes.

4 [REDACTED] But you would have to authorize her to make large
5 transfers of money, correct?

6 The Witness. Yes. Yes.

7 [REDACTED] So what I was saying earlier -- I want to be clear. You had to
8 authorize the substance of the payment prior to her being able to logistically execute the
9 wire?

10 The Witness. I invoke.

11

BY [REDACTED]

12 Q Now, Ms. Parsons still works for you, correct?

13 A Yes.

14 Q And she's in good standing with you, correct?

15 A Yes.

16 Q And she has not, to your knowledge, effectuated any transfers of large
17 amounts of money that you did not approve, correct?

18 A I don't know.

19 Q Have you known her to spend your money without your authorization?

20 A No.

21 Q Now, going to the next bullet, it says "Save the U.S. Senate" PAC. "As you
22 and I discussed, we are trimming \$100,000 off the support. With the prior gift of
23 \$250,000, that will provide a total giving of \$650,000 to the organization."

24 Why did you and Ms. Wren decide -- excuse me. Why did you and Ms. Parsons
25 decide to trim \$100,000 off the Save the U.S. Senate PAC?

1 A I invoke.

2 Q Now, you had previously given to the Save the U.S. Senate PAC, correct?

3 A I invoke.

4 BY [REDACTED]

5 Q Do you have any idea what the Save the U.S. Senate PAC is?

6 A I invoke.

7 Q It's your position that knowledge of what Save the U.S. Senate PAC is
8 implicates the First, Fourth, Fifth, or 14th Amendment here?

9 A Yes.

10 Q Okay.

11 Did you frequently donate to things that you didn't know what they were?

12 A I invoke.

13 Q Would Ms. Parsons have been allowed to donate that money to a PAC
14 without your approval?

15 Mr. Citro. Could you rephrase that one? I don't understand.

16 [REDACTED] Could Ms. Parsons have decided to donate money to a PAC on behalf
17 of LJ Management without your approval?

18 The Witness. No.

19 [REDACTED] Going next to "Tea Party Express," Ms. Parsons writes,
20 "We are cutting the budget in half to \$200,000. As we discussed, you can cut out the tv
21 of \$100,000 and you can determine where to trim the other \$100,000. With Trump
22 giving an appearance and speech, that will spread the word about the rally."

23 Did you understand that President Trump would be speaking -- the date of this
24 email is December 28th. Did you understand that President Trump would be speaking
25 at the rally that you were funding?

1 The Witness. I invoke.

2 ██████████ Can I go back for a moment really quickly?

3 Ms. Fancelli, in the proposal -- and we can bring it up again, but it's the one that
4 we showed you a moment ago with the grid with the descriptions.

5 But when it came to the Save the U.S. Senate PAC, Ms. Wren wrote in the
6 description that "this investment will help support attendance at President Trump's rally
7 on January 4th and will also enable the organization to make additional ad buys featuring
8 Donald Trump Jr to encourage Senators Loeffler and Perdue to vote to stop the steal in
9 Georgia on January 6."

10 What did you understand that to mean, in terms of encouraging Senators Loeffler
11 and Perdue to vote to stop the steal in Georgia on January 6th?

12 The Witness. I invoke.

13 ██████████ Were you a proponent of the Stop the Steal movement?

14 The Witness. I invoke.

1

2 [11:15 a.m.]

3 [REDACTED] We're going to go back to the prior email and just work
4 our way through it.

5 Now we see: "Alex Jones- As discussed, he will use \$50,000 of his \$200,000 for
6 the Rally operating budget if needed."

7 Did you understand your donation of \$200,000 to Alex Jones to be unrelated to
8 January 6th?

9 The Witness. I invoke.

10 [REDACTED] Was it your attention for Mr. Jones to profit or receive the rest of the
11 \$150,000 for whatever he wanted to use it for?

12 The Witness. I invoke.

13 [REDACTED] Did you have any conversations with Ms. Parsons as to what the
14 \$150,000 profit to Mr. Jones could be used for or should be used for?

15 The Witness. I invoke.

16 [REDACTED] And next it says the "Rule of Law Defense Fund- we are
17 cutting that by \$50,000... please trim how many or how much each attorney general gets
18 for expenses and other expenditures."

19 Did you understand this donation to be in support of the Republican attorney
20 generals' legal efforts to overturn the election?

21 The Witness. I invoke.

22 [REDACTED] Did you understand it to be related to efforts to fight
23 alleged election fraud?

24 The Witness. I invoke.

25 [REDACTED] I want to note for the record that, if we go back to the

1 budget plan that you received, it says that the amount of money there, "The Republican
2 Attorneys Generals (RAGA) have been incredibly supportive of President Trump's legal
3 efforts. This investment would fund their continued legal efforts to fight the election
4 fraud around the country with so many pending lawsuits."

5 So did you understand yourself to be funding election-related lawsuits around the
6 country?

7 The Witness. I invoke.

8 [REDACTED] Would you have objected to that donation if they in fact used the
9 funds to pay for robocalls or other crowd-building exercises for January 6th, or would you
10 have found that an acceptable use of the money that you donated?

11 The Witness. I invoke.

12 [REDACTED] Did they say -- did anybody from RAGA tell that you that the money
13 would be used for anything other than legal efforts to fight the election fraud around the
14 country?

15 The Witness. I invoke.

16 [REDACTED] We're going to go back to the email. We see next:
17 "Bluebonnet Fundraising LLC- no change."

18 And then: "Women for America First- \$300,000 will move to Round 1. If they
19 need additional funding, an another donor should be found."

20 We're actually going to come back to Women for America First a little later, Ms.
21 Fancelli, but I want to go down a little bit further, just to note -- because we'll talk about
22 this later -- in that next paragraph, it says, "Also, as we discussed, there isn't really
23 anything left in Round 2. Julie will pay her own NetJets billing and hotel costs and you
24 don't feel there will be a need for crowd building/bussing program. Since you don't
25 expect there to be any major speaker fees or travel- at most maybe a hotel room or very

1 minor cost, that should be minimal."

2 Do you recall Ms. Wren telling you and Ms. Parsons that there would be no major
3 speaker fees?

4 The Witness. I invoke.

5 [REDACTED] Now, is it fair to say that if Ms. Parsons wrote to Ms. Wren
6 that Ms. Wren said there would be no major speaker fees, that that's true, that that's
7 what Ms. Parsons was told?

8 The Witness. I don't know.

9 [REDACTED] Ms. Fancelli, in that line, "since you don't expect there to be any
10 major speaker fees or travel," this is Ms. Parsons emailing to Ms. Wren, correct?

11 The Witness. I don't know.

12 [REDACTED] Sorry. That was at the top. We covered this earlier.

13 [REDACTED] Yeah. We can scroll up a little bit, if --

14 [REDACTED] It's not meant to be a trick question. I'm just --

15 [REDACTED] Yeah, right --

16 [REDACTED] -- trying to get -- sorry, we can't talk at the same time.

17 So this was an email from Ms. Parsons to Caroline Wren. I am just clarifying,
18 because it was a while ago.

19 And so, if we go back, Ms. Parsons is saying to Ms. Wren: Since you, Ms. Wren,
20 don't expect there to be any major speaker fees or travel, at most maybe a hotel room or
21 very minor cost, that should be minimal. That suggests that Ms. Wren said there would
22 be no major speaker fees or travel expenses, right?

23 The Witness. I have no idea.

24 [REDACTED] Did you read this email ever?

25 The Witness. If I -- if I did, I don't remember.

1 [REDACTED] Sitting here now, reading it, understanding who it's from and who it's
2 to, do you have any reason to think that the "you" in that sentence is not Ms. Wren?

3 The Witness. Let me see that again. Where is that?

4 Mr. Citro. Hang on. Hold on a second. Let me point to it. I will just consult
5 with her. One sec.

6 [Discussion off the record.]

7 Mr. Childers. All right. Is that the highlighted sentence that we see as the
8 "you" that you were referring to earlier?

9 [REDACTED] Yes. I was just trying to clarify that, in this email from Ms. Parsons to
10 Ms. Wren, that the "you" that Ms. Parsons was referring to was Caroline Wren.

11 The Witness. I don't know. I mean --

12 [REDACTED] Let's assume for the sake of argument that it is Ms. Wren. If
13 Ms. Wren had known that there were in fact major speaker fees that were going to be
14 paid, would that have impacted you and Ms. Parsons' decision in terms of the budget?

15 The Witness. Can't speculate on that. I don't know.

16 [REDACTED] I want to scroll further up on this same email chain.

17 Ms. Wren responds -- no, I want to know -- if you scroll all the way to the top first,
18 because we are going to -- no, down -- that you were copied on the top email, right?
19 You were CC'ed again with Ms. Long.

20 And then scroll down to the email that precedes that. Ms. Wren writes to
21 Marianne; she says, "Hi Marianne, thank you for your due diligence and this all looks
22 great and we are so appreciative of Julie's unbelievably generous support of President
23 Trump. I agree with you regarding the Round 2 funding, I did not anticipate needing
24 those funds and this is going to be an incredibly successful event thanks to Julie and her
25 vision and dedication to making this happen! Below please find Charlie's mobile

1 number and I will also forward you the wire transfer information that Alex Jones sent
2 me."

3 Then it has Charlie Kirk and a phone number, and it says, "Thank you and I'm sure
4 we will be speaking many times tomorrow," with a smiley face.

5 Did your vision for the large -- well, first of all, what was your vision for
6 January 6th?

7 The Witness. I invoke.

8 [REDACTED] Did your vision include a large crowd in D.C. at the White
9 House Ellipse?

10 The Witness. I invoke.

11 [REDACTED] Did your vision include a large crowd at the U.S. Capitol?

12 The Witness. I invoke.

13 [REDACTED] When -- oh, go ahead.

14 [REDACTED] No, you go ahead.

15 [REDACTED] No, no. Oh -- go.

16 [REDACTED] Did your vision have to do with disrupting the certification
17 of the election results?

18 The Witness. I invoke.

19 [REDACTED] When Ms. Wren sent you the original proposal and it was called the
20 "Million MAGA March" -- and I'm assum- -- is it fair to assume that "MAGA" stood for
21 Make America Great Again?

22 The Witness. I invoke.

23 [REDACTED] And when it was called the "Million MAGA March," was it fair to
24 assume that you understood that the concept was a million people in support of MAGA
25 marching somewhere?

1 The Witness. I invoke.

2 ██████████ Given previous marches to the Capitol that these groups had
3 organized, was it fair to say that you understood or had conversations that it would be a
4 million people in support of MAGA marching to the Capitol?

5 The Witness. I invoke.

6

BY ██████████

7 Q Now, Ms. Fancelli, I want to discuss a bit further about the vision that
8 Ms. Wren thanks you for having in relation to January 6th.

9 If we could turn back to exhibit 4, which are text messages between you and
10 Ms. Wren. And we're going to go to the January 2nd, so this is a few days after the
11 email exchange we just discussed regarding a vision. And the Bates number ends with
12 428.

13 No, we can go up here.

14 So, on January 1st, it shows that you and Ms. Wren continued communications.
15 You text, "Can you speak for a minute? J," with some emojis. And later that day, you
16 text, "Can you speak now?" And Ms. Wren responds with a "Yes!"

17 Now, going to the next day, which is leading up to January 6th -- we're now at
18 January 2nd -- Ms. Wren sends you an article that says "More GOP Lawmakers Enlist in
19 Trump Effort to Undo Biden Win."

20 What did you think when you received this text from Ms. Wren?

21 A I invoke.

22 Q Was it your vision that January 6th would result in President Biden's win
23 being overturned?

24 A I invoke.

25 Q And did you have conversations about Ms. Wren regarding the overturning

1 of the election?

2 A I invoke.

3 Q If you can scroll down.

4 Hold on one second. Sorry.

5 And then you see, not long after you get that email, you respond with, "Hey?
6 How are you feeling? Are you looking for me? Can you speak now?"

7 And then, later, Ms. Wren responds with a video.

8 And then she sends you a tweet from Kylie Kremer that includes the hashtags
9 "StopTheSteal" and then hashtag "DoNotCertify." And that is retweeted -- you can't see
10 it in here, but I'll represent to you that it's retweeted by President Trump with "I will be
11 there" and "Historic day!"

12 Seeing that Ms. Wren sent you this 3 days before January 6th, was part of your
13 vision that there would be a Stop the Steal element to January 6th?

14 A I invoke.

15 Q Was it your vision that the election results would not be certified?

16 A I invoke.

17 Q Did you have conversations with Ms. Wren about the overturning of the
18 election?

19 A I invoke.

20 Q I want to scroll down to the next text you receive from Ms. Wren. And,
21 then, she sends you a text from Mark Meadows that says, "We're now at well over 100
22 House members and a dozen Senators ready to stand up for the election integrity and
23 object to certification. It's time to fight back."

24 Would it be fair that it seems like all your communications with Ms. Wren leading
25 up to January 6th are about stopping the certification of the election results?

1 A I invoke.

2 Q I'm going to go to the next message Ms. Wren sends you that we have here.

3 She says, "We are almost to 75 buses!!!!!" "Charlie Kirk is my hero."

4 Is it fair that that's because it was your goal for a large crowd to come to D.C.

5 while Congress was scheduled to certify the election?

6 A I invoke.

7 Q And what did you hope that these buses of people would accomplish while

8 in Washington, D.C.?

9 A I invoke.

10 Mr. Childers. Do you need a comfort break?

11 The Witness. Yeah. Take a break.

12 Mr. Childers. Tem, we've been going for a couple hours now. Could we take a

13 comfort break?

14 [REDACTED] Yeah, that's no problem at all. Let's do that. Should we

15 say -- well, how much time do you think you need, Jeff? Five minutes? Ten minutes?

16 The Witness. Ten.

17 Mr. Childers. Let's say 10.

18 [REDACTED] Okay. All right. No problem at all. We --

19 The Witness. Thank you.

20 [REDACTED] -- can go off the record.

21 Thank you, Ms. Fancelli.

22 The Witness. Thank you.

23 [Recess.]

24 [REDACTED] All right. We're going to go back on the record.

25 And I will note for the record that Mr. Raskin has joined the deposition.

1 Ms. Fancelli, when we left, we were looking at exhibit 4, which are text messages
2 between you and Ms. Wren.

3 The last thing we talked about were these -- when she sent you a text regarding,
4 "We're almost at 75 buses!!!!" "Charlie Kirk is my hero."

5 And then we're going to scroll down to a text that you sent on January 5th.

6 So I will note -- if you can scroll up, please -- I will note for the record it appears
7 that Ms. Wren is -- she was sending you updates about the building out of the stage for
8 the event, correct?

9 The Witness. Yes. Yes.

10 [REDACTED] So, next day, January 5th, which is the day before the
11 rally, you send Ms. Wren what I believe to be a link that says "BACKROOM DEAL: Pence,
12 Pelosi, McCarthy, McConnell, Have Secret Plan to Stop January 6th," and it trails off.
13 And you write, "Do you know anything about this? J," kiss emoji, American flag.

14 Do you recall sending Ms. Wren this text about a so-called plan to stop
15 January 6th?

16 The Witness. I invoke.

17 [REDACTED] Is it fair to say that all your communications with
18 Ms. Wren were about -- in the days leading up to January 6th were all about January 6th?

19 The Witness. I invoke.

20 [REDACTED] Is it fair to assume that when you sent the article to Ms. Wren asking
21 if Ms. Wren knew anything about this -- presumably the article that said "BACKROOM
22 DEAL: Pence, Pelosi, McCarthy, McConnell, Have Secret Plan to Stop January 6th" -- is it
23 fair to say that your inclusion of the kiss emoji and the American flag indicated that you
24 were not upset or concerned about that backroom deal?

25 The Witness. I invoke.

1 [REDACTED] I am going to scroll further down. And I believe that, at
2 that point, there's a picture of a crowd in Washington, D.C. And then Ms. Wren writes
3 to you, "Crowd is big and we just started." And you respond, "This is 'Huge'!!", kiss
4 emoji and I believe six American flags.

5 Is it fair that you were excited that the crowd on January 5th, leading up, was
6 already becoming a large crowd?

7 The Witness. I invoke.

8 [REDACTED] Was this part of the vision that Ms. Wren said that you
9 had for January 6th?

10 The Witness. I invoke.

11 [REDACTED] Would your use of quotes there around the word "huge" a tribute to
12 then-President Trump's use of that word?

13 The Witness. I invoke.

14 [REDACTED] Now, prior to January 6th, who else did you speak with
15 about your involvement in the January 6th event?

16 The Witness. I invoke.

17 [REDACTED] Now, you spoke with Kimberly Guilfoyle. Isn't that
18 correct?

19 The Witness. I invoke.

20 [REDACTED] I'm going to show you what's been marked as exhibit 22,
21 which are text messages between you and Kimberly Guilfoyle prior to January 6th.

22 Now, you see at the first page -- okay. I'm sorry.

23 Mr. Childers. We don't see it, [REDACTED]

24 [REDACTED] Yeah. Sorry. My apologies. It's coming up shortly.

25 If you see here, this shows you the two participants in this exchange. First is

1 "Julie Fancelli."

2 Ms. Fancelli, the number [REDACTED], that was the number you were using in
3 December 2020, correct?

4 The Witness. I suppose. I don't know.

5 [REDACTED] You said -- sorry. You said you suppose?

6 The Witness. Do you have that written down? Do you have it written on here?

7 [REDACTED] Yeah. Tell me if you can't see that there. It's above the
8 name "Julie Fancelli."

9 The Witness. And the --

10 [REDACTED] Yes.

11 The Witness. -- message came -- it came from that number?

12 [REDACTED] Yes.

13 Mr. Childers. Hold on. Let them ask the question, and then you answer.

14 The Witness. Okay.

15 Ask me again.

16 [REDACTED] Yeah. So I said, the number listed that ends in [REDACTED],
17 that's a number you were using in December 2020, correct?

18 The Witness. I invoke.

19 [REDACTED] All right.

20 We're going to scroll down and see the text message exchange between you and
21 Ms. Guilfoyle. And, then, on the right, you will see -- I will tell you, that's Ms. Guilfoyle
22 on the right, and your messages, I will represent, are on the left.

23 So, starting on the right, the message which is on December 31st, 2020, says, "Hi
24 it's Kimberly called you keeps going to vmail." And its status is that it was sent.

25 And we'll see that your response, which is at 12:20 [sic], it says, "Can u speak

1 now? J," which I'll note is the same way the text messages were signed off with
2 Ms. Wren.

3 Now, this shows that you were in communication with Ms. Guilfoyle prior to
4 January 6th, correct?

5 The Witness. I invoke.

6 [REDACTED] And you understood that Ms. Guilfoyle was in contact
7 with Ms. Wren prior to January 6th, correct?

8 The Witness. I invoke.

9 [REDACTED] What did you understand to be Ms. Wren's relationship
10 with Ms. Guilfoyle?

11 The Witness. I invoke.

12 [REDACTED] Did you have any conversations with Ms. Guilfoyle directly about your
13 donation of the \$3 million?

14 The Witness. I invoke.

15 [REDACTED] Did you see yourself as a donor to Ms. Caroline -- like, did you see
16 your donor relationship with Ms. Caroline Wren or with Ms. Kimberly Guilfoyle?

17 The Witness. I invoke.

18 BY [REDACTED]

19 Q Now, did you have any communication with Alex Jones prior to January 6th?

20 A I invoke.

21 Q And in December 2020 did you direct your assistant, Ms. Long, to contact
22 Mr. Jones for more information about the January 6th event?

23 A I invoke.

24 Q And did you understand that, prior to January 6th, Ms. Wren was in contact
25 with Mr. Jones regarding an event on January 6th?

1 A I invoke.

2 Q I'm going to show you what is exhibit 9. And this is -- you previously looked
3 at -- these are emails we looked at before but in a different format.

4 If you could scroll, this is page 2. Down. Okay, right there.

5 And, as you see, this email, at the subject line it shows that Caroline Wren sends
6 an email to Marianne Parsons and copies you and Ms. Long.

7 And with the line that begins with, "Below please find Charlie's mobile number
8 and I will also forward you the wire transfer information that Alex Jones sent me," does it
9 help refresh you that you knew that Ms. Wren was in contact with Alex Jones prior to
10 January 6th?

11 A I invoke.

12 Q Okay.

13 [REDACTED] I will note that Mr. Aguilar has joined the deposition.
14 I'm going to show you what's been marked as exhibit 23.

15 [REDACTED] Oh, Mr. Raskin came off video. He may have a question.

16 [REDACTED] Okay.

17 Mr. Raskin, did you have a question? I just saw you come off video.

18 Okay.

19 Ms. Fancelli, these are phone records that the select committee obtained from
20 Verizon.

21 And I will note for the record that your counsel stated in his January 28th, 2022,
22 letter to the committee that, quote, "Ms. Fancelli is also aware that the committee has
23 subpoenaed from Verizon all records related to her cell phone for an approximately
24 3-month period surrounding the Washington rallies."

25 Now, the committee has identified a phone number that belongs to Alex Jones

1 that is [REDACTED].

2 And I want to turn to page 9 of this exhibit, and it is a record that shows a
3 December 27th call. So you see it there. It's highlighted. And what this shows is a
4 conversation that originated in Lakeland from your phone number to Alex Jones in Austin,
5 Texas, that went for 11 -- excuse me, could you scroll up for me so I can read the -- scroll
6 to the right.

7 Oh, there we go. No, down, down.

8 Yeah, perfect.

9 -- that went for 11 minutes. In that 11-minute conversation with Alex Jones, did
10 you speak about the rally on January 6th?

11 The Witness. I invoke.

12 [REDACTED] Did Alex Jones express his plan for what happened on
13 January 6th?

14 The Witness. I invoke.

15 [REDACTED] Did you express your vision and desire for what would
16 happen on January 6th?

17 The Witness. I invoke.

18 [REDACTED] Do you even recall that conversation?

19 The Witness. I invoke.

20 [REDACTED] Did you speak with Alex Jones at all in December of 2020?

21 The Witness. I invoke.

22 [REDACTED] I'm going to turn to the next page of this same exhibit.

23 And you'll see then, again -- this is now on December 28th -- that there's a call between
24 you and Alex Jones that this time went for 23 minutes.

25 Again, on that call -- do you recall that phone call with Alex Jones?

1 The Witness. I invoke.

2 [REDACTED] On that call, did you discuss your plans for January 6th?

3 The Witness. I invoke.

4 [REDACTED] Did you discuss Mr. Jones's intentions regarding
5 January 6th?

6 The Witness. I invoke.

7 [REDACTED] There's not a lot of calls that day, Ms. Fancelli, and there are certainly
8 none that get up to 23 minutes. So would you have said that was a significant
9 conversation with Mr. Jones?

10 The Witness. I invoke.

11 BY [REDACTED]

12 Q At any time in December 2020 did you have a phone call with both Alex
13 Jones and Ms. Wren, a three-way call in that time period?

14 A I invoke.

15 Q Did you ever have any communications with both individuals, Ms. Wren and
16 Mr. Jones, at the same time, leading up to January 6th?

17 A I invoke.

18 Q Now, did you understand that prior to January 6th that Mr. Jones was in
19 contact with a woman named Cindy Chafian?

20 A I invoke.

21 Q Have you ever heard of a woman named Cindy Chafian?

22 A I invoke.

23 Q In December of 2020 or January of 2021, did you exchange any emails with
24 Alex Jones?

25 A I invoke.

1 Q I want to switch to the topic of Mr. Roger Stone. Do you have any
2 communication with Roger Stone or any of his representatives leading up to January 6th?

3 A I invoke.

4 Q Did you know whether Ms. Wren was in contact with Roger Stone or his
5 representatives leading up to January 6th?

6 A I invoke.

7 Q Okay.

8 I want to turn to the specific organizations that you donated to. I'm going to
9 start with the Turning Point organization, led by Charlie Kirk.

10 Was it Ms. Wren's idea or your idea for donations to go to Turning Point?

11 A I invoke.

12 Q What did Ms. Wren tell you, if anything, that Turning Point had planned for
13 January 6th?

14 A I invoke.

15 Q After speaking with Ms. Wren, did you in fact have conversations with
16 Charlie Kirk from Turning Point?

17 A I invoke.

18 Q In December 2020 or January 2021, did you have any conversations or
19 communication with Tyler Bowyer from Turning Point?

20 A I invoke.

21 Q Did you speak with anyone from Turning Point in December or January
22 of 2021?

23 A I invoke.

24 Q Now, earlier, you mentioned that you were aware that LJ Management
25 Services provided documents to the committee, correct?

1 A Yes.

2 Q And you know that LJ Management Services provided redacted copied of
3 your bank statements that are relevant to our inquiry, correct?

4 A I don't know.

5 Q Did Ms. Parsons talk to you about the documents that she provided to the
6 committee?

7 A No.

8 Q Did you have conversations with Ms. Parsons generally about her
9 cooperation with the committee?

10 Mr. Childers. I'm going to insert an objection on that, to the extent it calls for
11 you to ask her to explain conversations she had with her counsel.

12 [REDACTED] Well, I'm asking for the conversation with Ms. Parsons not
13 with the presence of counsel.

14 The Witness. Did I speak -- are you giving me a date?

15 BY [REDACTED]

16 Q I am asking you whether -- when the committee -- at any time, have you and
17 Ms. Parsons discussed her cooperation with the committee without lawyers present?

18 A Yes.

19 Q And did you understand her to be cooperating with the committee?

20 A Yes.

21 Q And did you understand that, in her role as the president of LJ Management
22 Services, she provided some documents related to you to the committee?

23 A Yes.

24 Q And did you understand that some of those documents had to do with the
25 transfers that we've been talking about?

1 A Yes.

2 Q And you understood that some of those included bank information from the
3 Bank of Central Florida, where you bank, correct?

4 A Are you talking about a specific time period on that?

5 Q Yeah. I'm talking from late December to early January.

6 A Before she met -- after she met with the committee and the investigators?

7 Q Well, what I'm asking is that -- well, let me clarify. I am asking about
8 communication that the committee had with Ms. Parsons at the end of 2021 about your
9 documents from December 2020 and January 2021. Does that help you understand?

10 A No, because -- I knew that she had talked, that you were gonna speak with
11 her. And what were you saying about the documents?

12 Q And did you understand that she gave us documents as well?

13 A Did I understand if she gave you -- if she gave you documents?

14 Q In her role as LJ Management Services president, that she provided
15 documents to the select --

16 A I don't know.

17 Q -- committee.

18 A I don't know.

19 Q Okay.

20 Did you understand whether the committee had requested documents from LJ
21 Management Services?

22 A Yes.

23 Q And you understood that the committee had requested financial documents
24 from LJ Management Services, correct?

25 A I don't know. No. I don't know if I remember or -- I don't know the

1 specifics of financial documents.

2 Q Well, let me offer you this, Ms. Fancelli. In the letter your lawyer provided
3 to the committee, your lawyer notes, "Ms. Fancelli is also aware that LJ Management has
4 voluntarily provided the committee with all documents evidencing donations or
5 contributions that Ms. Fancelli made to a small number of political groups involved in
6 some of the organizing events related to the January 6th rally at the Capitol. To her
7 knowledge, between the LJ Management documents and the banking records, the
8 committee possesses the totality of records documenting Ms. Fancelli's financial
9 participation in the rally."

10 So does that help refresh your recollection that you knew that LJ Management
11 Services provided your financial documents to the select committee?

12 A I knew that documents were turned over, but I didn't know anything about
13 the specifics.

14 [REDACTED] Ms. Fancelli, do you control LJ Management?

15 The Witness. Yes. Legally.

16 [REDACTED] There's nobody else? It's just you that controls the activities of that
17 entity?

18 Mr. Childers. Well, I object at -- [REDACTED] could you be a little more specific
19 about what you mean by "control"?

20 [REDACTED] Well, what I'm trying to figure out is, could Ms. Parsons have made
21 these decisions -- let me rephrase. Can Ms. Parsons make any decisions on behalf of LJ
22 Management without Ms. Fancelli's approval?

23 The Witness. She could.

24 [REDACTED] Well, how about this way --

25 The Witness. But she usually asks me or tells me afterwards, and then we

1 discuss on certain decisions. But, you know, on these dates, I really can't remember,
2 because so much was given to me, and my brain can only hold so much for so long. So --

3 [REDACTED] That's fair. And, to be clear, I know it's a lot of dates, and so if
4 there's something that you don't understand, just -- we're happy to walk through it. I
5 know it gets really confusing. So just slow us down, and we can try to ask the question
6 better. Because --

7 The Witness. Thank you.

8 [REDACTED] -- we're really not --

9 The Witness. No, excuse me. Go on.

10 [REDACTED] No, I was just going to say, we're really not trying to confuse you.
11 And I know, as the day gets longer, it gets harder to keep everything together. So --

12 The Witness. Yeah.

13 [REDACTED] -- if you need a break, if something's confusing, if you need us to give
14 you a date or just rephrase the question, like, please, don't hesitate. We're doing our
15 best, but I understand the dates get to be a lot.

16 The Witness. Thank you. And --

17 [REDACTED] So maybe a better way to ask this question is: Generally speaking,
18 what kinds of decisions can Ms. Parsons make without clearing them with you in
19 advance?

20 The Witness. I invoke.

21 [REDACTED] Okay.

22 [REDACTED]. Now, Ms. Fancelli, you bank at the Bank of Central Florida,
23 correct?

24 The Witness. Correct.

25 [REDACTED] I'm going to turn to what's been marked as exhibit 10,

1 which is a document that LJ Management Services provided to the committee.

2 Mr. Childers. Just wait for it to get up. It'll --

3 The Witness. Uh-huh.

4 [REDACTED] And you'll see it's a Bank of Central Florida bank
5 statement starting from December 10th, 2020, to January 10th, 2021. Ends in Bates
6 number LJMI 37.

7 Ms. Fancelli, you recognize this as one of your bank statements, correct?

8 The Witness. I rarely see my bank statements.

9 [REDACTED] Does it look like one of your statements that would
10 be -- first of all, is that your name and address for LJ Management Services on the left
11 there?

12 The Witness. That's my name, but I don't --

13 [REDACTED] You don't know the address of --

14 The Witness. -- know if I've ever seen --

15 [REDACTED] -- LJ Management? Oh, I'm sorry. I didn't mean -- I'm so sorry.

16 The Witness. No, that's okay. I just don't remember. I don't know if I've ever
17 seen a bank statement from them.

18 [REDACTED] Okay.

19 [REDACTED] Do you know whether they're located at 2000 East Edgewood Drive,
20 Suite 102, in Lakeland?

21 The Witness. Yes. I've been there. I've been to the office, but rarely.

22 [REDACTED] Fair.

23 [REDACTED] Okay.

24 Now, we're going to turn to the page ending -- page 3, ending in LJMI 39, which
25 notes a December 29th transfer for \$750,000 to Turning Point U.S. -- it should be just at

1 Turning Point Action.

2 Do you see that, Ms. Fancelli?

3 The Witness. Yes, I do.

4 [REDACTED] And you authorized that transfer. Is that correct?

5 The Witness. I invoke.

6 [REDACTED] Could Ms. Parsons have made that size transaction without your
7 approval?

8 The Witness. I invoke.

9

BY [REDACTED]

10 Q Generally speaking, does Ms. Parsons request your permission to transfer
11 large amounts of money?

12 A I invoke.

13 Q Now, you also transferred an additional \$250,000 to another Turning Point
14 entity around the same time, correct?

15 A I invoke.

16 Q What did you understand Turning Point to be doing in support of the
17 January 6th event?

18 A I invoke.

19 Q Now, you understood them to be helping bus people into the capital. Is
20 that correct?

21 A I invoke.

22 Q What did you understand Turning Point would spend the \$1 million that you
23 gave them in relation to January 6th?

24 A I invoke.

25 Q In the text message that we previously noted where Ms. Wren told you that

1 she loved Charlie Kirk as the 75 buses had already come in, that was because you helped
2 fund those 75 buses, correct?

3 A Can you repeat that?

4 Q Do you recall earlier when we showed you a text message from Ms. Wren
5 that indicated excitedly that 75 buses had come and Charlie Kirk was her hero? Do you
6 recall that?

7 The Witness. Can you turn that off for a minute?

8 Mr. Childers. What he's asking is, do you recall when they showed you the text
9 messages?

10 The Witness. I recall that you showed me the message, yes.

11 [REDACTED] Okay. All right. And so, with that message in mind,
12 what I'm asking you is, did you understand that Ms. Wren told you about this excitedly
13 because you had helped fund those buses to come to D.C.?

14 The Witness. I invoke.

15 [REDACTED] I want to turn to exhibit 11 -- what's been marked as
16 exhibit 11. And what this is here is an invoice from Bluebonnet Fundraising, Ms. Wren's
17 organization, to Turning Point Action and Charlie Kirk.

18 Now, what I will represent to you is that this is an invoice that Ms. Wren
19 submitted to Charlie Kirk to be paid a 5-percent commission off the \$1 million that you
20 donated her -- that you donated, excuse me, to Charlie Kirk and Turning Point and that
21 she profited an additional \$50,000 from that.

22 Did you know that Turning Point paid Caroline Wren a \$50,000 commission
23 because of your donation?

24 The Witness. I invoke.

25 Mr. Childers. [REDACTED] hang on a second. I want to consult with my client on a

1 matter for just one sec.

2 [REDACTED] Okay. Sure.

3 [Discussion off the record.]

4 Mr. Childers. Okay. Thank you.

5 The Witness. Okay. I'm ready.

6 [REDACTED] Yeah. Jeff, would you like us to restate the question?

7 Mr. Childers. Yes. Please do. Please repeat.

8 [REDACTED] Okay.

9 Ms. Wren [sic], knowing that I just explained to you that this invoice shows that
10 Ms. Wren was paid \$50,000 for acquiring your donation to Turning Point, did you know
11 that Ms. Wren was paid a 5-percent commission of \$50,000 because of your donation to
12 Turning Point?

13 The Witness. I invoke.

14 [REDACTED] If Ms. Wren had told you that she would be making 5 percent off of
15 the million dollars, would you have agreed to donate the same amount of money, or
16 would that have impacted your decisions in any way?

17 The Witness. I invoke.

18 [REDACTED] Now, you directed Ms. Parsons --

19 [REDACTED] Oh, wait. I'm sorry.

20 [REDACTED] Sorry.

21 [REDACTED] Just real quickly, earlier, when we were having the conversation about
22 the email that Ms. Parsons wrote, where you and Ms. Parsons -- where Ms. Parsons
23 represented in an email that you and she had sat down and gone line by line over Ms.
24 Wren's budget, do you remember ever having a conversation with Ms. Parsons about
25 Ms. Wren receiving multiple commissions in addition to the \$50,000 that you were

1 directly paying Bluebonnet?

2 The Witness. I invoke.

3 [REDACTED] Go ahead.

4 BY [REDACTED]

5 Q Now, this invoice date is dated January 4th, 2021.

6 I want to turn to the next day of January 5th, 2021. And I'm going to turn to
7 exhibit 12. If you scroll all the way to the bottom, please -- it's LJMI 62 is the first Bates
8 on this document.

9 But scrolling all the way to the bottom of the second page -- okay, stop, stop -- I
10 will note, it's an email from you on January 4th. You send it to Marianne Parsons. It
11 says, "I need to send 250,000\$ to Charlie Kirk ASAP," and it's signed "J," with a kiss face
12 emoji, three American flags, and another "j."

13 And then, on January 5th, Ms. Parsons responds, "Is this to Turning Point
14 Action - where you gave him \$1 million last week?" Signed, "Marianne."

15 And then, when we scroll up, you respond, "I think so! It is for busing in more
16 people. Call him. Do you have his #?" And then you signed that "J."

17 Do you recall sending these email messages?

18 A I invoke.

19 Q And did Charlie Kirk -- he was the one that requested this additional
20 \$250,000 from you, correct?

21 A I invoke.

22 Q And did Charlie Kirk also tell you that the money was needed for bussing
23 more people?

24 A I invoke.

25 Q Would you have decided what money was needed for January 6th by

1 yourself?

2 A I invoke.

3 Q Were you in a leadership position when it came to deciding what happened
4 on January 6th, or did other people decide how to spend the money that you donated?

5 A I invoke.

6 [REDACTED] Ms. Fancelli, as of Tuesday, January 5th, 2021, at 8:47 a.m., there had
7 been multiple news reports of the risk and threats of violence of what could happen at
8 January 6th.

9 Did that weigh into your decision in any way when you were deciding to donate an
10 additional \$250,000 to bus in more people to the events on January 6th?

11 The Witness. I invoke.

12 [REDACTED] I'm going to turn to exhibit 13, which is another statement
13 provided by LJ Management Services to the committee, and this is of a -- it's a different
14 statement we just looked at. It's from a money market account at your Bank of Central
15 Florida. And it ends in LJMI 45 as the Bates number.

16 And, at the bottom, if we scroll all the way down, on the first page, it
17 says -- there's a \$250,000 to Turning Point Action on January 5th.

18 Now, this is the same transfer you just approved over email message to
19 Ms. Parsons, correct?

20 The Witness. I invoke.

21 [REDACTED] I want to turn to the Save the U.S. Senate PAC.

22 Now, what did you understand the Save the U.S. Senate PAC to be doing in the
23 lead-up to January 6th?

24 The Witness. I invoke.

25 [REDACTED] Wait, actually, can we go back for moment, Ms. Fancelli? I wanted

1 to ask you a question about Charlie Kirk.

2 In the end, you ended up donating, I believe, about \$1.25 million to Turning Point.
3 And Mr. Kirk actually went out of his way to avoid being present or related to the events
4 on January 6th.

5 Did you have any conversations with him about his willingness to donate
6 \$1.25 million -- or, excuse me -- to spend money on the event, crowd-build the event, bus
7 people to the event, and yet his hesitancy to be associated personally with it in any way
8 on January 6th?

9 The Witness. I invoke.

10 [REDACTED] When you gave all that money to Mr. Kirk, was it your vision that he
11 would not be present or associated personally with January 6th at all?

12 The Witness. I invoke.

13

BY [REDACTED]

14 Q Turning to the Save the U.S. Senate PAC, I'm going to go to exhibit 14. This
15 is another record provided by LJ Management Services of one of your accounts.

16 I'll note, on the second page -- it ends in LJMI 31 -- it shows here that you
17 previously gave \$250,000 to Save the U.S. Senate PAC on November 24th, correct?

18 A Repeat that question.

19 Q I said, this statement shows that you transferred \$250,000 to Save the U.S.
20 Senate PAC on November 24th of 2020, correct?

21 A I invoke.

22 Q I want to turn to what funds occurred closer to January 6th with exhibit 10
23 and the page ending in LJMI 39, which is the third page of the document. You see the
24 second line item there shows a transfer from your account of \$400,000 to Save the U.S.
25 Senate PAC on December 29th.

1 That's the same Save the U.S. Senate PAC that we talked -- that we showed in
2 emails from Ms. Parsons to Ms. Wren, correct?

3 A I invoke.

4 Q Did you speak with Ms. Wren about the Save the -- excuse me, with
5 Ms. Parsons regarding the Save the U.S. Senate PAC?

6 A I invoke.

7 Q Did you direct Ms. Parsons to effectuate this transfer on December 29th?

8 A I invoke.

9 Q Does LJ Management Services have a process by which your employees can
10 transfer money out of your accounts for payments?

11 A I invoke.

12 Q Can Ms. Parsons, at her sole discretion, make decisions regarding transfers
13 to political organizations?

14 A I invoke.

15 Q Can Ms. Parsons spend your money as she sees fit?

16 A I invoke.

17 Q Does Ms. Parsons work for anyone besides you?

18 A I don't know.

19 Q Well, at LJ Management Services, does she have any other employer at LJ
20 Management Services besides you?

21 Mr. Childers. [REDACTED] that's a little confusing. You said, does she have any more
22 employers --

23 [REDACTED] Well --

24 Mr. Childers. -- at LJ Management?

25 [REDACTED] It's very difficult to make this clear when very simple questions about

1 direction are invoked. I don't know how else we're supposed to do this other than kind
2 of come at the seams. We've asked very straightforward, can she do this, can she do
3 that, and there's an invocation on everything.

4 So, if the entire line of questioning of what Ms. Parsons can do with or without
5 Ms. Fancelli's approval is going to lead to invocation, I don't want to waste a bunch of
6 time on it.

7 We thought it was an easy thing. This is a family office. Can she do things
8 without Ms. Fancelli's approval? Earlier, I believe Ms. Fancelli said no. Now we're at
9 invocation. So now we have to clarify.

10 Mr. Citro. So do you want to repeat the question?

11

BY [REDACTED]

12

Q Yes.

13

14

Ms. Fancelli, does Ms. Parsons confer with you before transfers are made out of
your accounts to political organizations?

15

A I invoke.

16

17

Q Does Ms. Parsons work for you in her role as president for LJ Management
Services?

18

A Yes.

19

20

Q Does she work for anyone else besides you in her role as president for LJ
Management Services?

21

A Not that I know of.

22

23

Q Is there anyone else you know that owns LJ Management Services besides
you?

24

A No.

25

[REDACTED] Ms. Fancelli, did you care whether Mr. Donald Trump, Jr., or his

1 associates actually spent the money that you donated to the Save the U.S. Senate PAC on
2 the Georgia Senate race?

3 The Witness. I invoke.

4 [REDACTED] I want to turn to exhibit 13, which is another bank
5 statement from one of your money market accounts. And this document was again
6 provided by LJ Management Services.

7 And I'm going to go to the page ending -- the first page, actually. And this shows
8 another transfer to the Save the U.S. Senate PAC for \$150,000 on January 4th.

9 Now, this transfer is from your account, correct?

10 Mr. Childers. Have you seen the statement before?

11 The Witness. I've never seen the statement.

12 [REDACTED] Okay.

13 Did you have conversations with Ms. Parsons about an additional transfer of
14 \$150,000 to the Save the U.S. Senate PAC on or about January 4th?

15 The Witness. I invoke.

16 [REDACTED] Did you understand the Save the U.S. Senate PAC to be
17 related to January 6th?

18 The Witness. I invoke.

19 [REDACTED] Now, were you aware that the Save the U.S. Senate PAC
20 paid Caroline Wren over \$80,000 as her commission for your donations?

21 The Witness. I invoke.

22 [REDACTED] What about -- well, never mind. Go ahead.

23 [REDACTED] We're going to turn to the Women for America First
24 organization --

25 [REDACTED] Hold on. Hold on one second.

1 [REDACTED] Okay.

2 [REDACTED] When Ms. Wren was talking with you about the donation to the Save
3 the U.S. Senate PAC, did she in any way suggest or disclose that she had a relationship
4 with them where she would make a commission off of whatever she got you to donate to
5 them?

6 The Witness. I invoke.

7 [REDACTED] Had you known that, would that have impacted your decision to
8 donate to them in any way or the amount that you would donate?

9 The Witness. I invoke.

10 BY [REDACTED]

11 Q Ms. Fancelli, are you aware of how the Women for America First group first
12 became involved with January 6th?

13 A No.

14 Q Had you heard of them prior to the planning for January 6th?

15 A No.

16 Q Were you aware that Women for America First had organized rallies prior to
17 January 6th?

18 A I invoke.

19 Q Were you aware that the Women for America First held the permit for the
20 Ellipse rally on January 6th?

21 A I invoke.

22 Q Were you aware that the Women for America First rally first held a "Stop the
23 Steal" rally in November 2020 that drew thousands of Trump supporters to the U.S.
24 capital?

25 A I invoke.

1 Q And were you aware that the Women for America First group held another
2 rally in December 2020 that also drew thousands of Trump supporters to the U.S. capital?

3 A I invoke.

4 Q Were you aware that that December rally resulted in violence, including
5 numerous people being stabbed?

6 A I invoke.

7 Q Now, you donated \$300,000 to Women for America First in late December of
8 2020, correct?

9 A I invoke.

10 Q I'm going to show you exhibit 10, which is another bank statement that LJ
11 Management Services provided the committee. We're going to go to page 3 of that
12 bank statement, and this page is Bates stamped LJMI 39.

13 And you see at the top there's a wire from your account of \$300,000 to Women
14 for America on December 29th. Does that refresh your recollection at all that you
15 authorized a transfer for that amount to that group?

16 A I've never seen this statement.

17 Q I'm not asking you about whether you've seen the statement; whether you
18 recall the transfer around that time, in late December?

19 A No.

20 Q Do you recall discussions about financially supporting the group -- a group
21 called Women for America First?

22 A I invoke.

23 Q What did you understand Women for America First to be doing in support of
24 the rally on the 6th?

25 A I invoke.

1 Q What did you understand them to be doing with the \$300,000 that you
2 transferred them for the rally on the 6th?

3 A I invoke.

1

2 [12:26 p.m.]

3

BY [REDACTED]

4

Q We're going to talk about the Tea Party Express.

5

Prior to your discussion with Ms. Wren, were you familiar with a group called the

6

Tea Party Express?

7

A I invoke.

8

Q Was it Ms. Wren's idea for you to donate money to the Tea Party Express, or

9

was it your idea?

10

A I invoke.

11

Q Now, you donated \$200,000 to the State Tea Party Express on December

12

29th, 2020, correct?

13

A I invoke.

14

Q Okay.

15

I'm going to show you exhibit 10, with the Bates number on the second page

16

ending in LJMI 38. At the bottom of that page, a transfer from your account on

17

December 29th indicates a \$200,000 payment to State Tea Party Express.

18

Now, you authorized Ms. Parsons to effectuate that payment. Is that correct?

19

A I invoke.

20

Q Now, what did you understand the Tea Party Express to be doing in support

21

of the January 6th event?

22

A I invoke.

23

Q Now, based on the budget plan that Ms. Wren provided you, the Tea Party

24

Express was going to create a website to promote the rally events on January 5th and 6th.

25

Isn't that right?

1 A I invoke.

2 Q And I will note that the plan says, quote, "They will use targeted ads to
3 promote the website to encourage individuals to attend and sign up via the webpage.
4 This will include both a television, radio and digital campaign to promote the January 6th
5 rally and will geo-target a 180 mile radius to encourage attendance."

6 So Ms. Wren told you that your money going to State Tea Party Express was to
7 increase the crowd size on January 6th, correct?

8 A I invoke.

9 Q And you knew that before you donated the money to Tea Party Express,
10 correct?

11 A I invoke.

12 Q Now, if you recall earlier, I mentioned an individual by the name of Taylor
13 Budowich and showed you his conversations with Ms. Wren. Do you recall that?

14 A I heard his name earlier. You spoke --

15 Q Okay.

16 A -- about him a couple times.

17 [REDACTED] Prior to us mentioning him earlier, had you ever heard that name
18 before?

19 The Witness. I invoke.

20 BY [REDACTED]

21 Q Are you aware that Taylor Budowich recommended the Tea Party Express to
22 Ms. Wren as an organization that should receive some of your money?

23 A I invoke.

24 Q And are you aware that Mr. Budowich was paid \$15,000 out of the money
25 that you donated?

1 A I invoke.

2 Q Did you understand that other individuals were going to make money off
3 your donations in addition to Ms. Wren?

4 A I invoke.

5 Q Now, you also donated \$150,000 to the Rule Defense Fund on December
6 29th, 2020, as well, correct?

7 A I invoke.

8 Q I'm going to show you exhibit 10 again. At the second page that ends in
9 LJMI 38, you can see at the bottom there the second transfer is a \$150,000 transfer to the
10 Rule of Law Defense.

11 And you authorized Ms. Parsons to effectuate that transfer, correct?

12 A I invoke.

13 Q Now, prior to the 6th, were you aware of any plans on what the Rule of Law
14 Defense Fund would do in relation to January 6th?

15 A I invoke.

16 Q And were you aware of any plans that the Rule of Law Defense Fund to send
17 out a robocall regarding January 6th before the 6th?

18 A I invoke.

19 Q And you are aware that the Rule of Law Defense Fund funded a January 5th
20 robocall that said, among other things, quote, "At 1:00 p.m. we will march to the Capitol
21 Building and call on Congress to stop the steal," end quote.

22 Are you aware of that robocall?

23 A I invoke.

24 Q Did Ms. Wren tell you beforehand that you would be funding a robocall to
25 say those words?

1 A I invoke.

2 Q Did anyone talk to you about the substance of the robocall before it went
3 out?

4 A I invoke.

5 [REDACTED] Ms. Fancelli, given your earlier text that we showed you where you
6 texted to Ms. Wren the day before an article, I believe, about stopping the steal, would
7 you have actually objected if anyone had told you that the Rule of Law Defense Fund was
8 going to put out a robocall saying, "We will march to the Capitol Building and call on
9 Congress to stop the steal"?

10 The Witness. I invoke.

11 [REDACTED] And for the sake of clarity for the record, Ms. Fancelli, if
12 you would note, in the budget and trip plan that Ms. Wren provided you, on the page
13 ending in LIMI 9, she notes that -- the "Republican Attorneys Generals" is what's listed
14 there as the line item for the Rule of Law Defense Fund contribution.

15 Did you know that the Rule of Law Defense Fund and the Republican Attorneys
16 General Association are related entities?

17 The Witness. I invoke.

18 [REDACTED] Now I want --

19 [REDACTED] When -- oh, sorry.

20 [REDACTED] Oh, go ahead.

21 [REDACTED] Really quickly.

22 When Ms. Wren represented to you on the budget and trip plan that the \$200,000
23 going to the Rule of Law Defense Fund was, quote, "The Republican Attorneys Generals
24 have been incredibly supportive of President Trump's legal efforts. This investment
25 would fund their continued legal efforts to fight the election fraud around the country

1 with so many pending lawsuits."

2 Had you known that the funds would actually be used to prepare the robocall
3 encouraging people to march to the Capitol and calling on Congress to stop the steal,
4 would that have impacted your donation in any way?

5 The Witness. I invoke.

6 [REDACTED] We're going to pull up exhibit 16, please, which ends with
7 the Bates number REVU 1.

8 Now, what we're showing you now is another invoice from Ms. Caroline Wren to
9 the Rule of Law Defense Fund. As you noted, we showed you the transfer you made,
10 Ms. Fancelli, for \$150,000, and, here, this is a commission to Ms. Wren that she's getting
11 paid off of your donation.

12 Were you aware that Ms. Wren again made \$12,000 commission off of the money
13 that you donated?

14 The Witness. I invoke.

15 [REDACTED] Did Ms. Wren tell you that she was separately invoicing
16 these organizations for the money that you donated to them?

17 The Witness. I invoke.

18 [REDACTED] Had you known that Ms. Wren -- and I think we're going to -- I don't
19 know if we're going to cover this, but -- had you known that Ms. Wren was going to make
20 \$198,800 off of her solicitation of donations from you to these different groups, would
21 you have agreed to that, or would it have impacted your donations in any way?

22 The Witness. I invoke.

23 [REDACTED] And just to be clear, Ms. Wren never disclosed in any way that she
24 was making nearly \$200,000 off of the \$3 million that you donated for the event on
25 January 6th, correct?

1 The Witness. I invoke.

2

BY [REDACTED]

3

Q I want to turn next to Free Speech Systems and Alex Jones.

4

Now, Ms. Wren, you're familiar with who Alex Jones is, correct?

5

A I invoke.

6

Q And is it fair to say that you're a fan of Alex Jones?

7

A I invoke.

8

Q Do you watch his programs and whatnot or listen to his podcasts?

9

A I invoke.

10

Q Now, earlier on, I showed you your phone records between you and Alex

11

Jones. So, prior to January 6th, you contacted Alex Jones. Is that correct?

12

A I invoke.

13

Q And you had multiple phone calls with Alex Jones on, I believe, December

14

27th and 28th, correct?

15

A I invoke.

16

Q I want to show you a document related to a few days after that, and that's

17

exhibit 10, another bank statement provided by LJ Management Services.

18

And I'm going to the third page of that document, and that's page 39. And

19

there's a donation, the fourth donation there, December 30th, to a "Security Bank of

20

CUnted States" for \$200,000.

21

[REDACTED] Do you need us to zoom further?

22

The Witness. No, no. I see it. I see it. I see it.

23

BY [REDACTED]

24

Q Yeah. And I think -- I'll just note, that's the Security Bank of Crawford,

25

except that "C," the "Crawford" is cut off, but I'll represent that to you.

1 A Okay. Well, thank you.

2 Q Yeah.

3 Now, as with other transfers that came out of your account, it's fair to say that
4 Ms. Parsons didn't have the authority to make large transfers without your permission,
5 correct?

6 A I invoke.

7 Q Does anyone else have access to your bank accounts besides Ms. Parsons or
8 your staff at LJ Management Services?

9 A I invoke.

10 Q Now, this transfer here is to Alex Jones. Isn't that correct?

11 A I invoke.

12 Q Were you aware that Mr. Jones spent some of the money that you gave him
13 on another rally on January 5th?

14 A I invoke.

15 Q Were you aware before what I just told you that there was another rally that
16 happened a day before the January 6th rally?

17 A I invoke.

18 Q Ms. Fancelli, is it your intention to assert the Fifth Amendment privilege and
19 the other privileges that you've stated to all questions we ask about financing of the rally
20 on the White House Ellipse on January 6th in Washington, D.C.?

21 A Yes.

22 Q And how would these questions implicate the privileges that you have cited?

23 A I invoke.

24 Q With regard to the Fifth Amendment, what criminal statutes are potentially
25 implicated by the truthful answer to our questions?

1 A I invoke.

2 Q And, to be clear, you're asserting a Fifth Amendment privilege in response to
3 all questions related to a fundraising effort surrounding January 6th because you have a
4 good-faith belief that the answer to these questions might expose you to possible
5 criminal prosecution?

6 A Yes.

7 [REDACTED] And I see that Mr. Raskin has turned his camera on.

8 Mr. Raskin, did you a question?

9 Mr. Raskin. Yes, I did.

10 Leaving aside the finances in that case, Ms. Fancelli, what did you hope would
11 happen on January the 6th?

12 The Witness. I invoke.

13 Mr. Raskin. Have you ever been a victim of bank fraud or wire fraud?

14 The Witness. I don't think so.

15 Mr. Raskin. Okay.

16 I yield back. Thank you.

17 [REDACTED] Do any other investigative counsel have any questions on
18 the topic of the financing of the rally?

19 Okay.

20 All right, Ms. Fancelli. Let's switch to a slightly different topic. Do you recall
21 approving the transfer of funds to pay for a private flight --

22 [REDACTED] Wait. Hold on a second.

23 [REDACTED] Sorry.

24 [REDACTED] Ms. Fancelli, how are you doing in terms of a comfort break? Are
25 you okay?

1 The Witness. I could --

2 ██████████ Can we continue?

3 The Witness. -- take a break. I could take break.

4 ████████████████████ How about -- Ms. Fancelli, how's about 10 minutes?

5 The Witness. Perfect.

6 ████████████████████ Okay.

7 The Witness. That would be perfect. Thank you.

8 ████████████████████ All right. Thank you, ma'am.

9 The Witness. Bye-bye.

10 [Recess.]

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██ We'll go back on the record.

BY ██

Q All right. Ms. Fancelli, we're going to start with the discussion of a private flight. There was a private flight that went from Fort Lauderdale in Florida to Washington, D.C., on January 5th for individuals to attend the January 6th rally.

Do you recall approving the transfer of funds to pay for that private flight?

A I invoke.

Q Okay.

I'm going to show you a document Bates numbered LJMI 85, which is exhibit 17, and it is -- we're going to start with the second page. And there's an email from Caroline Wren to Marianne Parsons with a subject line of "Flight."

And it says, "Hello Marianne, attached please find the invoice for the flight from Ft. Lauderdale to DC tomorrow. Please let me know if you need any additional information."

And the responsive email, which is the first page of that document, from Ms. Parsons on January 4th at 4:45, forwards that email to Sharon Wheeler and Darlene Milton.

Sharon Wheeler works for LJ Management Services, correct?

A Correct.

Q And Darlene Milton works for LJ Management Services, as well, correct?

A That's correct.

Q In that email, Ms. Parsons states, "Julie just approved wiring these funds for a flight to DC."

Do you recall that you did, in fact, approve wiring funds for a flight to D.C.?

1 A I invoke.

2 Q Okay.

3 I'm going to show you a document that LJ Management Services produced which
4 has been marked as exhibit 18, and it is LJMI 2 as a Bates number. Now, this is a flight
5 itinerary from Private Jet Services with the reference to "Blue Bonnet Consulting."

6 Scrolling up to the top, please -- continue all the way to the top.

7 A Can you repeat that sentence?

8 Q Yeah. Happy to. I said it's a flight itinerary from Private Jet Services. At
9 the top left, you can see that it's from a company called Private Jet Services. And under
10 that, you see it references "Blue Bonnet Consulting," Caroline Wren's company.

11 A I don't see that.

12 Q And then it notes here -- it has a date of January 5th. It has a trip number.
13 And, on the left side, it notes a list of passengers.

14 Do you see that, Ms. Fancelli?

15 Mr. Citro. The passengers right there.

16 The Witness. Yes.

17

BY [REDACTED]

18 Q And do you see, in the middle, it indicates a departure from Fort Lauderdale
19 on January 5th and, under that, an arrival in Washington, D.C., also on January 5th? Do
20 you see that?

21 A Uh-huh. I see it.

22 Q Okay. Great.

23 And these are documents that were provided by your family office, LJ
24 Management. Have you seen this invoice before?

25 A No.

1 Q Now, this is the flight that you approved that Ms. Parsons wired the funds
2 for in the prior email, correct?

3 A I invoke.

4 Q I want to turn your attention to the passengers list on the left side of the
5 email. Do you see that list?

6 A Yes, I do.

7 Q And looking at the last name on that list, do you see that it says "Roger
8 Stone"?

9 A Yes, I do.

10 Q Now, you knew that Roger Stone would be on this flight from Florida to D.C.,
11 correct?

12 A I invoke.

13 Q And am I correct that you agreed to pay for a flight knowing that you'd be
14 transporting Roger Stone to the rally on January 6th?

15 A I invoke.

16 BY [REDACTED]

17 Q Ms. Fancelli, do you recognize any of the other names on the passenger list
18 on the left?

19 A I invoke.

20 Q Do you know that Dr. Gina Loudon is a member of the Trump campaign's
21 media advisory board and the co-chair of Women for Trump 2020?

22 A I invoke.

23 Q Are you aware that Kristin Davis is somebody who works with Mr. Roger
24 Stone?

25 A I invoke.

1 Q Okay. Do you know who the other individuals are -- Jason Browning,
2 Rebecca Karabus, Catharine O'Neill?

3 A I invoke.

4 Q Did Ms. Wren actually tell you that she would be putting some friends of
5 hers on the flight?

6 A I invoke.

7 Q Do you remember having any conversations with Ms. Wren about who
8 would be allowed to travel on the flight that you were paying for?

9 A I invoke.

10 Q Okay.

11

BY [REDACTED]

12 Q We're next going to turn to -- I want to discuss the speaker lineup for the
13 rally on the Ellipse on January 6th.

14 Now, in December 2020, did you speak with Ms. Wren about possible speakers
15 about -- did you speak with Ms. Wren about the possible speakers for the rally on the
16 6th?

17 A I invoke.

18 Q And did you express to Ms. Wren your desires about who should speak at
19 the January 6th event?

20 A I invoke.

21 Q Okay. It's correct that you expressed to Ms. Wren that you wanted
22 Kimberly Guilfoyle to speak at the rally on the Ellipse, correct?

23 A I invoke.

24 Q Did you express to Ms. Wren that you wanted Donald Trump, Jr., to be a
25 speaker at the rally on the Ellipse?

1 A I invoke.

2 Q Did you express to Ms. Wren that you wanted Alex Jones to be a speaker?

3 A I invoke.

4 Q But you did express to Ms. Wren that you wanted Roger Stone to be a
5 speaker, correct?

6 A I invoke.

7 Q In the lead-up to January 6th, did Ms. Wren consult with you about potential
8 speakers at the rally?

9 A I invoke.

10 Q Did Ms. Wren update you about the speakers list and any changes to that
11 list?

12 A I invoke.

13 Q Did you ask her questions about who would be speaking leading up to the
14 6th?

15 A I invoke.

16 Q On January 6th, did you ask her whether certain individuals would be taking
17 the stage that day?

18 A I invoke.

19 [REDACTED] Real quickly.

20 Ms. Fancelli, certain witnesses have said that on January 5th there was a call that
21 Ms. Wren and Ms. Guilfoyle made to some of the other rally organizers who were
22 planning the events on January 6th, and during that call it -- let me be clear, it was not
23 alleged that you were on this call. But during that call it was alleged that Ms. Guilfoyle
24 and Ms. Wren were screaming at the rally organizers that the donor was demanding that
25 Roger Stone and Alex Jones be on the stage on January 6th, that she donated this \$3

1 million to have those speakers speak.

2 Is that consistent with your understanding of anything that happened in your
3 conversations related to January 6th?

4 The Witness. I invoke.

5

BY [REDACTED]

6 Q I want to turn to exhibit 4 again, which are the text messages that you
7 exchanged with Ms. Wren. And that's exhibit 4, and the Bates number ends in REVU
8 431.

9 I believe they're on January 6th, [REDACTED]

10 Right here.

11 Ms. Fancelli, so the date is Wednesday, January 6th, at 10:20 a.m. You text
12 Ms. Wren, "Hey! Are you in the middle of it all?", kissy face emoji, American flag. "Does
13 Rodger speak this afternoon?", another kissy face emoji and American flag.

14 That's Roger Stone you're asking about, correct?

15 A I invoke.

16 Q And you're asking whether Roger Stone is gonna speak at the rally at the
17 Ellipse that's happening that day, correct?

18 A I invoke.

19 Q And you're asking Ms. Wren because she's the one that you paid for donor
20 advisement and whatnot about the rally, correct?

21 A I invoke.

22 Q And, if you note, Ms. Wren, on the right, responds, "It's INCREDIBLE," and
23 she does not answer your question regarding Roger Stone, correct?

24 A I invoke.

25 Q And then you respond to Ms. Wren, "How many people? Where is

1 Rodger?"

2 And, again, that is Roger Stone and you're asking when he's appearing on the
3 stage, correct?

4 A I invoke.

5 Q And you were asking how many people because you were concerned about
6 the crowd size at the rally, correct?

7 A I invoke.

8 Q And did you understand Ms. Wren to be saying it's incredible because the
9 rally had brought in a very large amount of people to the Ellipse?

10 A I invoke.

11 Q Now, Ms. Wren responds, "Hundreds of thousands." "I'm Backstage potus
12 about to go up." "He is SOOO happy." It appears Ms. Wren again does not answer
13 your question about where is Roger.

14 And you respond with a thumbs up, another kiss face emoji, and an American flag,
15 and you say at 11:55 a.m., "where are the buses with all of Charlie Kirks youth? Where
16 does Rodger speak?"

17 With regard to the buses, you're inquiring about the buses that you helped fund
18 to bring people to the rally, correct?

19 A I invoke.

20 Q And you were asking again about where is Roger Stone going to speak on
21 January 6th, correct?

22 A I don't know.

23 Q Then you ask -- without a response from Ms. Wren, you ask, "What is really
24 happening?!", a kissy face and three American flags. This is at 1:50 p.m.

25 And Ms. Wren responds, "I don't know everyone and everything I've seen was

1 peaceful." "But the images are awful."

2 I will represent to you that I believe the Capitol was first encroached around 1:30
3 p.m., if I'm not mistaken, but it happened before 1:50 p.m.

4 Here, you were asking about what's really happening with regard to potential
5 violence at the Capitol, correct?

6 A I invoke.

7 Q And the reason why Ms. Wren responds that she didn't know but what she'd
8 seen was peaceful was because the images she was seeing now were not peaceful,
9 correct?

10 A I invoke.

11 Q And you respond, "What images?", and you sign it with "j." And you again
12 ask, "Where are Rodger and Alex speaking?", and you signed that with "j," a kiss face
13 emoji, and an American flag.

14 So I think, at that time, that is the fourth time that day you've asked Ms. Wren
15 about Roger Stone speaking, correct?

16 A I invoke.

17 Q And that's because you wanted Roger Stone to speak on January 6th and
18 expected him to, correct?

19 A I invoke.

20 [REDACTED] Ms. Fancelli, if I could clarify, on Wednesday, January 6th, at 1:50
21 p.m., when you asked, "What is really happening?!", presumably, with the question mark
22 and exclamation mark, it's possible that you had seen things on the news that indicated
23 that something might be going wrong at the Capitol, and you were trying to check with
24 somebody who was actually there and present.

25 When she says, "But the images are awful," you then say, "What images?", which

1 would suggest that our interpretation that you knew what was happening when you said,
2 "What is really happening?!", was actually not that you had seen the images yet. And
3 we're trying to figure out from reading the texts what you meant.

4 And so what I'm trying to figure out is: Is it fair to say that, when Ms. Wren says,
5 "The images are awful," and you say, "What images?", had you, in fact, seen images of
6 people storming the Capitol?

7 The Witness. I invoke.

8

BY [REDACTED]

9 Q Now, the Alex that you reference here when you say "and Alex speaking,"
10 you're asking where Alex Jones is going to speak on January 6th, correct?

11 A I invoke.

12 Q And that's because you expected both Roger Stone and Alex Jones to be
13 speakers on January 6th, correct?

14 A I invoke.

15 Q Now, later on, you say, "Who were the people that 'stormed' the chamber?
16 Antifa? jj," American flag.

17 At that point, you are referencing people who have stormed the Capitol, correct?

18 A I invoke.

19 Q Now, prior to the rally at the Ellipse, did Ms. Wren tell you that Alex Jones
20 would be a speaker at the rally?

21 A I invoke.

22 Q Did she tell you that Roger Stone would be a speaker at the rally?

23 A I invoke.

24 Q But, by these text messages, is it fair to say that you understood
25 them -- even during the rally and after President Trump had spoken, you still expected

1 both Alex Jones and Roger Stone to speak?

2 A I invoke.

3

BY [REDACTED]

4 Q Did Ms. Wren ever have conversations with you prior to January 5th to
5 inform you that the organizers of the January 6th event were creating an entirely
6 separate event on January 5th where, quote, "the fringe right or the crazies" could speak
7 so that they would not be on stage with the President on January 6th?

8 A I invoke.

9 Q Did she ever have conversations with you regarding the people who were
10 organizing the rally having strong objections to Roger Stone or Alex Jones being on stage
11 at any event on January 6th?

12 A I invoke.

13 Q Did she ever convey to you that the request that you made at the time that
14 you donated nearly \$3 million -- no -- \$3 million to this event that many of your requests
15 would, in fact, not be carried out on January 6th?

16 A I invoke.

17 Q And let me be clear: as it pertained to the speakers that people
18 represented that you were interested in.

19 A I invoke.

20 Q Okay.

21 Did Ms. Wren ever ask you to pick up the phone and call anybody at the White
22 House or call anybody at the Trump campaign to personally request that the speakers
23 that you wanted be present on the stage on January 6th?

24 A I invoke.

25 Q Did Ms. Wren ever mention to you that she attempted to have put in

1 speeches made on January 6th a thank you or tribute to you for your donation?

2 A I invoke.

3 BY [REDACTED]

4 Q Besides the speaker selection, were there are other requirements that you
5 gave Ms. Wren regarding your donations?

6 A I invoke.

7 Q Anything else that you expressed to Ms. Wren that you wanted but not that
8 you required?

9 A I invoke.

10 Q Did Ms. Wren tell you that, at the time you were texting her about Alex
11 Jones and Roger Stone speaking, she already knew that they would not be speaking at all
12 on the 6th?

13 A I invoke.

14 Q I want to turn to the question of speakers' fees. We can pull up
15 exhibit -- excuse me one second.

16 Do you recall -- oh, sorry, one second.

17 If you recall, there was a document I showed you that Ms. Wren provided called
18 the "Fancelli Budget & Trip Plan," where Ms. Wren had budgeted \$200,000 for speaker
19 fees and travel. Do you remember that?

20 A Airplane travel, on the plane, that one?

21 Q No. Speakers' fees and speakers' travel. Do you remember that?

22 A Slightly. I mean, I remember you showed me --

23 Q Yeah. I can show you.

24 It's exhibit 8, please, [REDACTED] On page 2 of exhibit 8. If you scroll down, if you
25 scroll down.

1 So do you see there it has -- in her proposed budget, it says: "Speakers
2 Fees/Speakers Travel." "This is money we are holding back to assist VIP speakers that
3 will need potential speakers fees, flights, lodging, etc."

4 Do you remember us discussing this document?

5 A Oh, yeah. Yes. Now I remember -- I remember the 200. I do better
6 remembering numbers than --

7 Q Okay.

8 Now I'm going to show you exhibit 7 --

9 A Oh, no.

10 Q -- which is another email we've previously looked at, and page 2 of that.
11 And this is Ms. Parsons' email where she says, at the top, "Julie and I went through the
12 budget and discussed each line item and considered what we know about each
13 organization. Attached is the revised amounts Julie would like to provide with
14 discussion below."

15 And at the last paragraph, beginning with "Also" -- this is a line we've talked about
16 before. It says, "Since you don't expect there to be any major speaker fees or travel- at
17 most maybe a hotel room or very minor cost, that should be minimal." And, here, it
18 seems like you and Ms. Parsons cut out the \$200,000 line item.

19 Do you recall our conversation regarding this?

20 Mr. Childers. You remember him asking about it before, don't you?

21 The Witness. I remember him asking me, yeah.

22 Mr. Childers. Yeah. Okay.

23 [REDACTED] Yeah. Yeah.

24 The Witness. But --

25 Mr. Childers. That's it.

1 The Witness. Okay.

2

BY [REDACTED]

3

Q Yeah. Now, was it your understanding that the money you donated to the various groups on the 6th would not be used to pay speakers' fees?

4

A I invoke.

5

Q Now, you and Ms. Fancelli -- excuse me -- you and Ms. Parsons had specifically taken out the line item to pay for speakers' fees, hadn't you?

6

A I invoke.

7

Q And, based on that, is it not fair to conclude that you did not expect your money to be going to additional speakers' fees?

8

A I invoke.

9

Q I'm going to show you what's been marked as exhibit 21, which are text messages between Caroline Wren and Kimberly Guilfoyle. So I'll tell you on the left is Kimberly Guilfoyle and on the right is Caroline Wren in blue. And these messages begin on January 4th. And the Bates number is REVU 456.

10

And then Ms. Wren texts on the 4th of January, "Don't forget to call Julie," with two prayer hand emojis.

11

And Ms. Guilfoyle responds, "Yes text me at 445." "Rushing and packing."

12

And then later on that day, Ms. Wren follows up another text that says in all caps,

13

"CALL JULIE."

14

And we're going to go, continuing this conversation, to the page ending in 459.

15

And then, here, Ms. Wren says, "Don and Eric can speak 'if they want' for 3 minutes."

16

And Ms. Guilfoyle responds, "And you will pay us that's the deal so don't even

17

think about it." "And I will see him in an hour." "You will send the funds as promised."

18

"And I'm going to deal with all of these people. What a fucking joke."

1 And then Ms. Wren responds to Ms. Guilfoyle, "That is not fair I can't pay you'll for
2 a speaking engagement you aren't speaking at and are refusing to allow me to publicize
3 and not to mention I got humiliated in the process by these assholes I am so furious."

4 Ms. Guilfoyle responds, "Bullshit done for life." "You and me."

5 Go to the next page that ends in 460.

6 And Ms. Wren responds, "Really? I am the one who set all of this up for you and
7 is constantly looking out for you and I lost to them. If you'll are speaking obviously you
8 will get paid Julie has been burned so bad in all of this so if I have her pay you \$60,000 to
9 speak at an event and then you DONT speak how does that make me look!?" "I just
10 can't do that she would never speak to me again." "She only cared about you speaking."

11 Ms. Guilfoyle responds, "Bull shit. And don is speaking and I told you wait
12 one hour."

13 Ms. Wren responds, "It wasn't up to me to wait! Katrina had a meeting with
14 POTUS at a set time." "I called her as soon as we hung up and told her I reconfirmed
15 that don and Kim wanted to speak."

16 Now, Ms. Wren discussed -- did Ms. Wren discuss paying Ms. Guilfoyle to speak at
17 the rally with you?

18 A I invoke.

19 Q And did Ms. Wren discuss paying Donald Trump, Jr., to speak at the rally with
20 you?

21 A I -- I -- I invoke.

22 Q Did Ms. Wren discuss paying anyone to speak at the rally with you after you
23 removed the speaker fees line item from the budget?

24 A I invoke.

25 Q Did you express to Ms. Wren that you cared about Kimberly Guilfoyle

1 speaking at the rally on the 6th?

2 A I invoke.

3 Q Now, in these messages, Ms. Wren --

4 [REDACTED] Real quick.

5 [REDACTED] I'm sorry.

6 [REDACTED] I want to be clear on this, Ms. Fancelli. It's very clear in Ms. Wren's
7 text that she is representing to Ms. Guilfoyle that "Julie only cared about you speaking."

8 Is there any world in which you cared whether Kimberly Guilfoyle spoke on
9 January 6th?

10 The Witness. I invoke.

11 Mr. Childers. Hey, [REDACTED]

12 [REDACTED] Yeah?

13 Mr. Childers. Just briefly, I just noticed -- sorry. Could you identify whoever
14 has joined that is displayed as a number sequence [REDACTED]-

15 [REDACTED]. Yes. It's investigator [REDACTED]. He was on
16 previously under his name, but he switched to a different device.

17 Mr. Childers. Okay. Thank you.

18 [REDACTED] Yeah. No problem.

19 The Witness. Okay. Where were we?

20 Mr. Childers. Wait for the next -- another question.

21 BY [REDACTED]

22 Q Sorry, Ms. Fancelli. Did you have something you wanted to say?

23 A Oh, no. I was just saying, where were we?

24 Q Okay.

25 So, as you recall, Ms. Wren says, quote, "Julie has been burned so bad in all of

1 this," end quote.

2 Do you know what Ms. Wren was referring to about how you were burned so
3 bad?

4 A I do not know.

5 Q Did you have desires for the rally that were disregarded by the organizers?

6 A I invoke.

7 Q Did you express to Ms. Wren that you were upset about how rally planning
8 had gone?

9 A I invoke.

10 Q Did Ms. Wren speak to you about any disagreement that she had with
11 organizers of the rally at the Ellipse?

12 A I invoke.

13 Q Okay.

14 I want to go back to that same exhibit with the Bates number -- where we just
15 were -- ending in 461.

16 Just scroll down, [REDACTED] Up, please. Right there.

17 So Ms. Wren says to Ms. Guilfoyle, "You're done for life with me because I won't
18 pay you a \$60,000 speaking fee for an event you aren't speaking at?" "That's fucking
19 insane." And then it's "Fix" with an asterisk. "But as of now, Katrina and Taylor have
20 sabotaged my entire event that I killed myself working on for two weeks." "And I can't
21 even get you to pick up the goddamn phone and thank Julie after asking you 75 times.
22 This poor woman has donated \$1 million to Dons senate PAC and \$3 million to this rally
23 and you'll can't take 5 minutes out of your day to thank her. It's so humiliating. And
24 then you have the audacity to ask me why I won't have her pay you \$60,000?"

25 Did Ms. Wren reach out to you for a potential payment to Ms. Guilfoyle of

1 \$60,000 for speaking at the rally?

2 A I invoke.

3 Q And Ms. Guilfoyle responds, "And FYI called many times and texted her and
4 called her again she's not answering where is she?" "I have called her a million times!!!"
5 "And I will tell her all of this you are way out of line."

6 Ms. Wren responds, "I cannot believe you are angry at me it literally makes no
7 sense." "But yes, please tell Julie that I booked you and don to speak at an event and
8 then dons political team advised against it and then told the president you didn't want to
9 speak and that you'd still like her to pay you \$60,000."

10 Did Ms. Guilfoyle attempt to reach out to you multiple times, as she indicates
11 here?

12 A I invoke.

13 Q Did Ms. Wren discuss her disagreements with Ms. Guilfoyle with you?

14 A I invoke.

15 Q Did you know of the disagreement between them before today?

16 A I invoke.

17 Q If you noted, these messages are occurring, I believe, on January 4th. I'm
18 going to show you exhibit 22, which we previously looked at, which are text messages
19 between you and Kimberly Guilfoyle. And I'm going to show you the page ending in KG
20 3 as a Bates number.

21 Hold on.

22 Mr. Childers. The Bates number is going to be at the bottom, but they're going
23 to zoom in to what we need to see.

24 [REDACTED] Actually, you know what? It's KG 2. Excuse me.

25 The Witness. What's the Bates number for?

1 Mr. Citro. It just means the page number.

2 [REDACTED] It's page 2 at the --

3 The Witness. He's pointing it out, what they want me to look at.

4 Mr. Citro. They will.

5

BY [REDACTED]

6 Q I will note -- if you'll scroll up, please, [REDACTED]

7 If you look at this message here on the right that begins with "Hi honey" -- I think
8 down a little bit.

9 No, down. Right there.

10 And I represent, that is a message from Kimberly Guilfoyle to your number, and it
11 is dated January 4th, which is the date, at 11:33 p.m., which is the same date we were
12 just talking. It says, "Hi honey called you many times keeps going to voicemail."

13 And then the next one below that says, "Pls call soon as your able. We are on
14 our way to DC watching the President I spoke then don now potus in Georgia flying back
15 with him. Very excited about Wednesday. Are you here? Xoxox."

16 Did you receive these messages from Kimberly Guilfoyle on or around January 4th
17 of 2021?

18 A I invoke.

19 Q Do you recall Ms. Guilfoyle trying to contact you at any time prior to the
20 Ellipse rally?

21 A I invoke.

22 Q I'm going to go to the next page of this document, which ends in KG 3. And
23 you see here, the first message from Ms. Guilfoyle to you is at -- it's on January 30th,
24 2001, so after the rally.

25 And she says, "Hi Julie, I just want to reach out and let you know that we are

1 thinking about you. I'm so sorry that they dragged your name into all of this. I hope
2 you are doing well. Xx Kimberly."

3 And the response from you says, "Hi! I'm doing sooo... very well. Maybe one
4 day we can speak in person."

5 Now, you exchanged these messages with Ms. Guilfoyle after the rally, correct?

6 A Is this on -- what day is this?

7 Q This is January 30th of 2021.

8 A Oh, okay. So -- I invoke.

9 Q Now, did at any time Ms. -- did Ms. Wren request that you pay Ms. Guilfoyle
10 and Mr. Trump to speak at the Ellipse rally?

11 A I invoke.

12 Q And did you know that at Ms. Wren's direction that Turning Point used some
13 of the money that you donated to pay Kimberly Guilfoyle and Donald Trump, Jr., \$60,000
14 to speak at the rally on the Ellipse?

15 A I invoke.

16 BY [REDACTED]

17 Q Would you have agreed to pay Kimberly Guilfoyle and Don Jr. \$60,000 in
18 speaker fees had anyone actually asked you?

19 A I don't know.

20 Q Just to be clear, "I don't know" meaning, I might have approved it? I might
21 have been okay with it? Can you clarify what you mean by "I don't know"?

22 A No. It's hard to remember where my mind would be at, you know, 2 years
23 ago. I have to think about -- I would have to think back into my thoughts 2 years ago,
24 which, you know, is pretty long. It's pretty hard for a 72-year-old to do that. You
25 know, I don't have notes, I don't have references. I mean, I've seen this, but I don't have

1 anything that's jogging my mind. Let's put it that way.

2 Q So let me make it -- let me try to make it a little bit easier. Sitting here
3 today, do you think you would have been okay with paying Don Jr. and Kimberly Guilfoyle
4 \$60,000 in speaker fees to speak on January 6th?

5 A I don't know. I really don't. I don't know if I would approve that.

6 Q I don't think we could pick up for the -- I didn't hear what you said at the
7 end.

8 A I said I don't know if I would have approved that at that time, because I can't
9 remember my state of mind at that time.

10 Q Okay. Thank you. That's helpful.

11 BY [REDACTED]

12 Q Ms. Fancelli, would it be your intention to assert your Fifth Amendment
13 privilege against any additional questions about your involvement and knowledge of the
14 speakers at the rally on the White House Ellipse on January 6th?

15 A Can you please repeat that?

16 Q Yeah. Is it your intention that you would assert the Fifth Amendment
17 privilege to all remaining questions that we would ask about your involvement in --

18 [Discussion off the record.]

19 [REDACTED] Sorry. One moment, Ms. Fancelli. We just have to clarify
20 something.

21 [REDACTED] Clarify something, yeah.

22 The Witness. That's okay.

23 BY [REDACTED]

24 Q Yeah. Is it your intention to assert the various privileges that you
25 previously noted to all questions we ask about your involvement in and knowledge of the

1 speakers at the rally on the White House Ellipse on January 6th and January 5th?

2 A Yes.

3 Q And can you tell us how these questions would implicate the various
4 privileges that you've invoked?

5 A I invoke.

6 Q Can you tell us what criminal statutes are potentially implicated by your
7 truthful answers to these questions?

8 A I invoke.

9 Q And, to be clear, you're asserting the various privileges that you previously
10 noted in response to all questions related to the fundraising efforts surrounding January
11 5th and 6th because you have a good-faith belief that the answers to these questions
12 might expose you to possible criminal prosecution?

13 A Yes.

14 [REDACTED] Do any other investigative counsel have any questions on
15 these topics?

16 All right. I don't think we have any members on, currently.

17 BY [REDACTED]

18 Q All right, Ms. Fancelli, I want to return to the topic of Alex Jones.

19 Prior to January 6th, did you have any discussions with Alex Jones about the
20 legitimacy of the 2020 Presidential election?

21 A I invoke.

22 Q Prior to January 6th, did you have any discussions with Alex Jones about any
23 plans to disrupt Congress in its attempt to certify the 2020 Presidential election?

24 A I invoke.

25 Q Prior to January 6th, did you have any discussions with Alex Jones about a

1 plan to march to the U.S. Capitol on January 6th?

2 A I invoke.

3 Q Prior to January 6th, did you have knowledge of Alex Jones planning to lead
4 a march to the U.S. Capitol?

5 A I invoke.

6 Q And prior to January 6th, did you have any discussions with Alex Jones about
7 people going inside the U.S. Capitol on January 6th?

8 A I invoke.

9 Q Is it your intention to assert the various privileges you've invoked to all
10 questions we ask about conversations with Alex Jones regarding the rally on the White
11 House Ellipse on January 6th in Washington, D.C.?

12 A Yes.

13 Q And, similarly, is it your intention to assert all the privileges you previously
14 noted to all questions we ask about your conversations with Mr. Jones regarding the rally
15 on January 5th in Washington, D.C.?

16 A Yes.

17 Q And can you tell us how these questions would implicate the various
18 privileges that you've asserted?

19 A I invoke.

20 Q Can you tell us what criminal statutes are potentially implicated by your
21 truthful answers to those questions?

22 A I invoke.

23 Q Now, to be clear, are you asserting a Fifth Amendment privilege in response
24 to all questions relating to your conversations with Alex Jones regarding the 5th and the
25 6th because you have a good-faith belief that the answers to those questions might

1 expose you to possible criminal prosecution?

2 A Yes.

3 [REDACTED] Do any other investigative counsel have any questions on
4 this topic?

5 And I see that no members are on now.

6 BY [REDACTED]

7 Q Ms. Fancelli, I want to turn briefly to the day of the rally at the Ellipse,
8 January 6th.

9 You didn't attend the rally, correct?

10 A No, I didn't attend. Did not.

11 Q Yeah. Where were you during the rally?

12 A I was here at my house.

13 Q Okay. And that's in Lakeland?

14 A Yes. In Lakeland, Florida.

15 Q Yeah. And as we saw earlier through the texts, you were in contact with
16 Caroline Wren on the day of the rally, correct?

17 A I invoke.

18 Q Okay. Did you observe the events as they unfolded at the Capitol?

19 A I invoke.

20 Q Did you have conversations with anyone else besides Caroline Wren about
21 January 6th on the day of January 6th?

22 A I invoke.

23 [REDACTED] Were you watching the television to see what occurred at the Capitol
24 on January 6th?

25 The Witness. No. No television, no.

1 [REDACTED] Did you learn about what happened on January 6th in
2 real-time?

3 The Witness. Hmm --

4 Mr. Citro. Why don't you explain what you mean by "real-time."

5 Mr. Childers. And, also, [REDACTED] you said "about what happened." A lot of things
6 happened on January 6th, so maybe be a little more specific.

7 [REDACTED] Yeah, sure. I'm happy to, Jeff.

8 BY [REDACTED]

9 Q Ms. Fancelli, when did you first learn that individuals had breached the
10 Capitol on January 6th?

11 A I invoke.

12 Q Did you learn about people being inside the Capitol on January 6th while
13 people were still in the Capitol?

14 A I don't remember. Let me think. I have to think. Repeat that question.

15 Q Did you learn about people being in the Capitol in real-time while individuals
16 were still in the U.S. Capitol?

17 Mr. Childers. He means, did you know about it when it happened or did you find
18 out about it later?

19 The Witness. Later. Like everyone.

20 BY [REDACTED]

21 Q When did you find out about it?

22 A I saw it later that evening on a device.

23 Q By "device," do you mean your cell phone?

24 A No, not my cell phone. On another device, like, an iPad or something like
25 that.

1 Q And did you see the images of the Capitol being breached at that time?

2 A Yes.

3 [REDACTED] Do you think that was during the evening?

4 The Witness. More in the evening, like, 6:00-ish, 5:00-ish, something like that.

5 [REDACTED] So the entire day of January 6th --

6 The Witness. It was before dinner. It was before dinner.

7 [REDACTED] Okay. So the entire day of January 6th, you thought the rally was
8 going on as you understood it to be going on?

9 The Witness. I invoke.

10 BY [REDACTED]

11 Q When Ms. Wren texted you at 1:50 p.m. that the images are awful, did you
12 do any further research to find out what she was talking about?

13 A I invoke.

14 Q Did you care at that point if the images were awful from the event that you
15 had paid for --

16 A I invoke.

17 Q -- at 1:50 p.m.?

18 A I invoke.

19 Q And when you responded to Ms. Wren asking her who were the people that,
20 quote, "stormed," unquote, the chamber, at that time you understood that the Capitol
21 had been breached, correct?

22 A I invoke.

23 Q And when Ms. Wren texted you a video -- when you asked her whether it
24 was Antifa and she responded with a video of gates being open and people on the Capitol
25 grounds, you understood at that time, around 4:00 p.m., that people had breached the

1 Capitol, correct?

2 A I invoke.

3 [REDACTED] Well, there's a text from you to Ms. Wren at 3:56 p.m. where you ask
4 her, "Who were the people that 'stormed' the chamber? Antifa? Jj," flag emoji.

5 So is it fair to say that by 3:56 p.m. you were aware that some people had stormed
6 the Chamber of the Capitol?

7 The Witness. I invoke.

8 BY [REDACTED]

9 Q Ms. Wren, is it your intention -- excuse me. Ms. Fancelli, is it your intention
10 to assert the various privileges that you previously noted to all questions -- to all
11 remaining questions we would ask about your actions and communications on
12 January 6th?

13 A Yes.

14 Q And how do these questions implicate the various privileges you've noted?

15 A I invoke.

16 Q And what criminal statutes are potentially implicated by your truthful
17 answers to these specific questions?

18 A I invoke.

19 Q Now, to be clear, are you asserting a Fifth Amendment privilege in response
20 to all questions related to your actions and communications on January 6th because you
21 have a good-faith belief that the answers -- that truthful answers to those questions
22 might expose you to criminal prosecution?

23 A Yes.

24 [REDACTED] And do any other investigative counsel have any questions
25 on these topics?

1 And I believe we still do not have any members who have joined.

2

BY [REDACTED]

3 Q All right. We want to turn to your support of Sidney Powell and the
4 Defending the Republic Fund.

5 Now, in November or December of 2020, did you have any communications with
6 Sidney Powell regarding the 2020 Presidential election?

7 A I invoke.

8 Q Did you have any communications with any representative of Sidney Powell
9 regarding the 2020 Presidential election?

10 A I invoke.

11 Q Did you have any conversations with Sidney Powell regarding litigation
12 related to challenging the 2020 Presidential election?

13 A I invoke.

14 Q Do you know what the Defending the Republic Fund is?

15 A I invoke.

16 Q I'm going to show you what's been marked as exhibit 14, which are
17 documents provided by LJ Management Services of your bank records. I'm going to turn
18 to the page ending LJMI 34, which shows a check.

19 And I'll let us get there. It looks like -- right there.

20 Now, this is a check that was provided by your family office from your account.

21 And, looking just at the check, does this look like a check from your checkbook?

22 Mr. Childers. Does it have your signature on it?

23 The Witness. No. No, because I can't see the --

1

2 [2:39 p.m.]

3 Mr. Childers. Pull up the signature so she can see.

4 The Witness. No, that's not my signature. But not only that, I don't see the
5 check number. So --

6 Mr. Childers. It's right at the top.

7 The Witness. No --

8 Mr. Childers. Yes.

9 Hold still for a second.

10 The Witness. I don't see the bank account number.

11 Mr. Citro. Oh, the bank account number? It's down at the bottom.

12 Mr. Childers. Scroll up the screen a little.

13 The Witness. It's canceled.

14 Mr. Citro. Oh, it's canceled.

15 The Witness. Which is good.

16 [REDACTED] No, it's redacted --

17 The Witness. If I don't see that, I can't -- I don't know. I don't know. I've
18 never seen this before, so --

19

BY [REDACTED]

20 Q Now, is that name, the second name, authorized signature, do you read that
21 as "Marianne Parsons"?

22 A Yes. Authorized --

23 Q And she's someone who's authorized to sign checks, correct?

24 A Yes. Yes.

25 Q And is that name at the top, is that Ms. Wheeler at the top?

1 A Yes.

2 Q And she is another person who's authorized to sign checks for you, correct?

3 A Yes. Yes.

4 Q Okay.

5 Now, Marianne Parsons and Ms. Wheeler, this check here, you authorized them to
6 issue this check to Ms. Sidney Powell, correct?

7 A I invoke.

8 Q What did you understand to be the goal -- and I'll point you to the bottom
9 left. On the memo line, it says, "Contribution -- Defending the Republic Election
10 Integrity Fund." Do you see that?

11 A Yes.

12 Q What did you understand to be the goal of the Defending the Republic
13 Election Integrity Fund?

14 A I invoke.

15 Q What did you understand Sidney Powell to be doing with the money that
16 you provided to her?

17 A I invoke.

18 Q Did you understand her to be funding efforts to overturn the Presidential
19 election?

20 A I invoke.

21 Q Did you contribute any other money in support of legal efforts to overturn
22 the 2020 Presidential election?

23 A I invoke.

24 [REDACTED] Have you filed any complaints, either bar complaints or have you filed
25 any civil suits against Ms. Powell in relation to these funds?

1 The Witness. No.

2 [REDACTED] Have you been contacted by anyone in terms of possible civil suits
3 against Ms. Powell for possible fraud in soliciting these funds?

4 The Witness. No.

5 Mr. Citro. For purposes of that question, we assume you don't mean the
6 conversations with her counsel.

7 [REDACTED] I'm sorry?

8 Mr. Citro. For the purposes of your question, we assume you are excluding any
9 conversations she's had with legal counsel.

10 [REDACTED] Oh, that -- I thought we said that at the beginning. That should be
11 for every question.

12 Mr. Citro. You didn't, but that's why we're making sure.

13 [REDACTED] Okay. Apologies.

14 Ms. Fancelli, if we did not clarify that at the beginning --

15 [REDACTED] We did.

16 [REDACTED] If there's something that you think we're asking that even resembles a
17 conversation with your attorneys, we are not intending to ask you about conversations
18 that you have had with counsel, which would be privileged. We are asking for other
19 conversations or other actions taken.

20 So that goes for every question. I just want to make that clear.

21 The Witness. Okay.

22 [REDACTED] Okay.

23 BY [REDACTED]

24 Q Ms. Fancelli, is it your intention to assert the various privileges you have
25 invoked to all questions we ask about your involvement with financing post-election

1 lawsuits regarding the 2020 Presidential election?

2 A Yes.

3 Q And how do these questions implicate the various privileges you've invoked?

4 A I invoke.

5 Q And what criminal statutes are potentially implicated by your truthful
6 answers to those questions?

7 A I invoke.

8 Q Now, to be clear, you're asserting a Fifth Amendment privilege in response
9 to all questions related to funding post-election lawsuits because you have a good-faith
10 belief to believe -- a good-faith belief, excuse me, that the answers to those questions
11 might expose you to possible criminal prosecution?

12 A Yes.

13 [REDACTED] And do any investigative counsel have any followup on
14 this topic?

15 I believe no members have joined.

16 BY [REDACTED]

17 Q Ms. Fancelli, since January 6th of 2021, have you been contacted by any law
18 enforcement, whether State or Federal, regarding the events in Washington, D.C.?

19 A I invoke.

20 Q Did you provide any documents, materials, or other evidence to any law
21 enforcement official since January 6th?

22 A Not that I know of.

23 Mr. Childers. Well, tell them.

24 The Witness. Not that I know of.

25 [REDACTED] Okay.

1 [REDACTED] I just -- Ms. Fancelli, when we ask you if you have been contacted by
2 law enforcement regarding the events in Washington, D.C., and you invoke, and then we
3 ask you did you provide materials, documents, and evidence to law enforcement and you
4 say not that you know of -- we're trying to figure out -- there's a rhyme-or-reason
5 problem here to these objections, in terms of when you invoke and when you don't
6 invoke.

7 So is it your position that there is some First, Fourth, Fifth, or 14th Amendment
8 privilege that allows you to invoke whether --

9 Mr. Childers. Hold on one second. We're going to --

10 Mr. Citro. Let's consult with our client real quick to see if we can answer that
11 question, all right?

12 [REDACTED] Thank you.

13 [Discussion off the record.]

14 Mr. Citro. I think the issue was -- I think what you're asking, has anybody tried to
15 interview her or question her about January 6th and the events, and the answer is no.
16 She has a number of friends in the community, including elected officials, who are law
17 enforcement officers that she speaks to regularly. I think that was the hang-up on the
18 first one. So --

19 Mr. Childers. Informally, Amanda. Not --

20 The Witness. Informally.

21 Mr. Childers. -- as part of any investigation.

22 So, if you were just more clear about -- I think what you're getting at is, has she
23 been contacted relative to any other investigation, and she can answer that.

24 [REDACTED] Okay. So I'll tell you what. Why don't we do this? Since there's a
25 clear world that you feel comfortable disclosing, like, can she just say: Has she been

1 contacted by Federal or State law enforcement in regards to an investigation of the
2 events on January 5th or 6th in Washington, D.C.?

3 Mr. Childers. Perfect.

4 The Witness. Perfect, yeah. No.

5 [REDACTED] Okay. Great. Thank you.

6 All right. Well, I told you, if you'd just let us work there, we would try to get
7 there and we'd get it clear. So we will get there.

8 BY [REDACTED]

9 Q Ms. Fancelli, after January 6th, did you have conversations with Ms. Wren
10 about the events of January 6th?

11 A I invoke.

12 Q I'm going to point you towards exhibit 19, what's been marked as exhibit 19,
13 which is Bates stamped REVU 165.

14 I'm showing you an email that is from you, from Julie Fancelli, to Caroline Wren,
15 and it's January 7th at 3:02 p.m. The subject line says, "Alex Jones Lays Out What Really
16 Happened At The US Capitol," and it has a link. And it says, "WATCH WHAT REALLY
17 HAPPENED IN DC! TRUMP AND THE PATRIOTS WERE SET UP!", both ending with
18 exclamation marks.

19 Do you recall sending this email to Ms. Wren on January 7th?

20 A I invoke.

21 Q Did you have any other conversations besides this email with Ms. Wren after
22 January 6th?

23 A I invoke.

24 Q After January 6th, did you have any communication with Kimberly Guilfoyle?

25 Mr. Childers. Did you ever talk to Kimberly after January 6th?

1 The Witness. Anytime after in a 2-year period afterwards? Is that what you're
2 saying?

3 [REDACTED] Have you spoken to her since January 6th, yes?

4 The Witness. Within a year?

5 Mr. Citro. Yeah.

6 Mr. Childers. Yeah. Since January 6th, 2021.

7 The Witness. You're asking me if I talked with her?

8 [REDACTED] Yes.

9 The Witness. She called me.

10 [REDACTED] Did you speak with her in or about October of 2021?

11 The Witness. What was the date?

12 [REDACTED] Around October 13th of 2021.

13 The Witness. I don't know the date, but I did speak with her. She called me
14 when I was in Italy.

15 [REDACTED] Okay.

16 Mr. Childers. Were you in Italy in October?

17 The Witness. Yes, I was in Italy in October. I can't remember the exact date,
18 but it's possible that could be the date, or later October. I don't know. But I did speak
19 with her. I mean, she called me, and I picked up the phone. With a --

20 [REDACTED] And --

21 The Witness. -- regular -- okay.

22 [REDACTED] I'm sorry, what was the last thing you said?

23 The Witness. Just picked up the landline phone in Italy.

24 [REDACTED] Okay. A regular phone.

25 [REDACTED] Oh.

1 [REDACTED] Okay. And what was the substance of your conversation
2 with Ms. Guilfoyle?

3 The Witness. I invoke.

4 [REDACTED] Was the conversation in part about the events of
5 January 6th or events related to January 6th?

6 The Witness. I invoke.

7 [REDACTED] Did Ms. Guilfoyle request that you put out a statement
8 noting that she had nothing to do with the funding of the rally at the White House Ellipse?

9 The Witness. Put them on hold.

10 Mr. Childers. Okay.

11 Just a sec.

12 [Discussion off the record.]

13 The Witness. Okay. I invoke.

14 [REDACTED] Okay. And, to be clear, the question you invoked to was,
15 so I remember, was whether Ms. Guilfoyle requested you put out a statement noting that
16 she had nothing to do with the funding of the rally at the White House Ellipse?

17 The Witness. I invoke.

18 Mr. Childers. Yes.

19 The Witness. Oh. Yes.

20 [REDACTED] Okay.

21 [REDACTED] Yes, she requested --

22 [REDACTED] No, no. Yes, I was confirming --

23 The Witness. I invoked that one before.

24

BY [REDACTED]

25 Q Yeah. I got you.

1 After you talked to Ms. Guilfoyle in October 2021 or around that time, did you
2 discuss those contacts with Ms. Guilfoyle with your staff at LJ Management?

3 A I don't remember.

4 Q Do you often send faxes -- when you were in Italy, do you ever send faxes
5 back to your staff at LJ Management Services?

6 A Yes.

7 Q Okay. And does that sometimes include -- well, let me ask you this: Did
8 you send a fax to your staff regarding your conversation with Ms. Guilfoyle?

9 A No.

10 Q Okay.

11 A I don't remember. But I think it's no.

12 Q All right.

13 A But I don't remember.

14 Q I'm going to show you a document provided by LJ Management Services,
15 which --

16 A Okay.

17 Q -- is exhibit 20, and Bates number begins with LJMI 93. And we're going to
18 start with the bottom of the second page, which is an email from Darlene Milton to
19 Marianne Parsons. The subject line says, "Just giving you and FYI -".

20 I'm going to jump down to the last big paragraph.

21 A What's that?

22 Q If you want to --

23 A Wait.

24 Q I'm sorry?

25 Mr. Childers. Darlene.

1 Mr. Citro. There was just a lag in what you said. We didn't hear who it was
2 from.

3 [REDACTED] Oh, I'm sorry.

4 If you could scroll up, please, [REDACTED]

5 So you can see here it's October 13th, 2021, from Darlene Milton to Marianne
6 Parsons.

7 The Witness. She's in Russia?

8 Mr. Childers. I think she's quoting you.

9 [REDACTED] Well -- yeah, we're going to get to it.

10 So, if you see, Ms. Milton says to Ms. Parsons: "Hello -- Just want to give you a
11 heads up. Julie returned her signed tax returns; I will get them out today or tomorrow.
12 She also included a note to Sharon and I, which said" -- and it has three --

13 [REDACTED] Carets.

14 [REDACTED] What do you call them?

15 [REDACTED] Carets.

16 BY [REDACTED]

17 Q We'll just call them carets.

18 It says, quote, "I approve of \$16,000 for Morningside furniture," end quote.

19 A Uh-huh.

20 Q Did you often -- before payments could be made, would you give such
21 approvals for funds to be released like the one that's there?

22 A Yes.

23 Q Okay.

24 Next one: Quote, "I hope you are having cool weather like here!", end quote.

25 And then, quote, "Newspapers and Kimberly Guilfoyle are looking for me. I am

1 in Russia you can tell them and unknown return. She did something, and they want to
2 drag me in on it. I don't have a clue what exactly she did, but when she called me at
3 11:00 PM last night out of the blue, she sounded desperate. She wants me to release a
4 statement that she didn't ask for funds for January 6, which isn't true!"

5 And then: "(at least that is what the last three words look like the say, they were
6 cut off)."

7 And then Darlene signs it off, "Just wanted to make you aware."

8 Now, here, when you say, "I am in Russia you can tell them," is that fair that you
9 actually were in Italy but you wanted your staff to tell reporters and whatnot that you
10 were in Russia?

11 A Yes.

12 Q Okay. And when you said that "she did something, and they want to drag
13 me in on it," what did you think that Kimberly Guilfoyle did?

14 A I invoke.

15 Q Now, to be clear, Ms. Fancelli, I'm not asking about anything that you did.
16 I'm asking just your thoughts on what you think Ms. Kimberly Guilfoyle did. Is that what
17 you're invoking to?

18 A Hold it. Stop it.

19 [Discussion off the record.]

20 Mr. Childers. I'm sorry, can you repeat the last question again? We took a
21 second to read it. There's a lag between when we can see it and you guys are talking.
22 So, if you could just repeat the last question one more time, we'd appreciate it.

23 [REDACTED] No problem.

24 Ms. Fancelli, you indicate about Ms. Guilfoyle, "She did something, and they want
25 to drag me in on it." What did you mean when you said that Ms. Guilfoyle did

1 something?

2 The Witness. I invoke.

3 [REDACTED] Is the basis for the invocation something other than the Fifth
4 Amendment, since the Fifth Amendment doesn't give you a privilege to invoke for things
5 that other people did wrong?

6 The Witness. I invoke.

7 [REDACTED] On which ground?

8 The Witness. I decline to answer pursuant to the rights afforded me under the
9 Constitution, including the First, Fourth, Fifth, and 14th Amendments.

10 [REDACTED] Now, you say, "She wants me to release a statement that
11 she didn't ask for funds for January 6, which isn't true!"

12 So did Ms. Guilfoyle in fact ask you for funds for January 6th?

13 The Witness. I invoke.

14 [REDACTED] Now --

15 [REDACTED] Wait just a second.

16 [REDACTED] Sorry, go ahead.

17 [REDACTED] Sorry.

18 Ms. Fancelli, do you have any reason to believe that Ms. Milton would lie or
19 misrepresent what you told her in the note that you gave to her and Sharon?

20 The Witness. I don't know.

21 [REDACTED] Does she still work for you, Ms. Milton?

22 The Witness. Yes, she still works for me.

23 [REDACTED] Okay.

24 Mr. Childers. You have to let them finish --

25 The Witness. Oh, sorry.

1 Mr. Childers. -- asking the question before you answer.

2 The Witness. Okay.

3 [REDACTED] Have you ever known her to be dishonest?

4 The Witness. I don't know.

5 [REDACTED] Would you have fired her if you did, or do you keep dishonest people
6 on your payroll?

7 The Witness. I would have fired her.

8 [REDACTED] Thank you for that.

9 Go ahead.

10 BY [REDACTED]

11 Q Now, after January 6th, did you have any communication with Alex Jones?

12 A I invoke.

13 Q After January 6th, did you have any communication with Charlie Kirk?

14 A I invoke.

15 Q After January 6th, did you have any communication with Roger Stone?

16 A I invoke.

17 Mr. Childers. Do you need to take a break?

18 The Witness. No, no, it's fine. It's just the chair is uncomfortable.

19 [REDACTED] Ms. Fancelli, if you need to take a break, we are really good. Like,
20 we don't want you to be uncomfortable.

21 The Witness. She can go on.

22 Go on.

23 Mr. Childers. Well, why don't you just --

24 The Witness. No. This one's better. This one's better. It's not perfect, but
25 let's just go.

1 We'll keep going. It's okay.

2 [REDACTED] Okay.

3 The Witness. I'll wait until I have to take a powder-my-nose break.

4 [REDACTED] Okay.

5 One second, Ms. Fancelli.

6 [Discussion off the record.]

7 [REDACTED] So, Ms. Fancelli, is it your intention to assert --

8 Mr. Citro. Hold on. Hold on one second. We're switching pillows, her
9 cushions out.

10 [REDACTED] Oh, no, no. Please take your time.

11 The Witness. Okay. Let's try this.

12 Mr. Citro. Is that better?

13 The Witness. Okay.

14 I have sciatica. Sorry.

15 [REDACTED] And, as Amanda said, any breaks you need, please, you let
16 us know.

17 Mr. Childers. All right. So go ahead. You were asking about the intention.

18 [REDACTED] Yeah. Well, we were asking about communications. And I want to
19 make clear for the record that the reason we are asking all of these questions -- and
20 we've had these communications with your counsel. I just want to make it clear for you
21 and the record that, in order to gather the facts surrounding this, we get the testimony of
22 witnesses who were involved, and we ask them questions. And, as you can see, we get
23 a lot of different information from different people. And so, when one person says this
24 is what happens or this is what Ms. Fancelli says or this is what Ms. Fancelli wanted, it's
25 only fair to then go to Ms. Fancelli and say, what happened, is that correct, and get your

1 side of the story.

2 So I just thought it might be helpful to explain why we are asking all of these
3 questions and why we're showing all of this to you. Because it would be grossly unfair if
4 you didn't find out until months later that people were saying these things and we didn't
5 give you an opportunity to weigh in and tell your side of the story.

6 So I just wanted to --

7 The Witness. Thank you.

8 [REDACTED] I just thought it might be helpful for you to understand why we ask all
9 these questions the way that we do, why we show you all of these things -- is because we
10 have to gather as many facts as we can and try to be fair about giving everybody their
11 opportunity to have their story heard.

12 So it is absolutely your constitutional right to invoke when it's legally appropriate.
13 We can debate with the lawyers whether that's what happened here. But I just thought
14 it would help if you kind of understood where we were coming from in terms of why
15 we're asking you all these questions. Okay?

16 So, when we ask you about your communications with other people, it's not just
17 simply because we actually want to know whether you had those communications; it's
18 because, if other people said you had these communications, it's not fair to not ask you to
19 confirm whether that's true or not.

20 Does that make sense?

21 The Witness. Yeah, that makes sense.

22 [REDACTED] Okay.

23 So, on that note, I think we can probably continue.

24 [REDACTED] Yeah.

25 BY [REDACTED]

1 Q Ms. Fancelli, is it your attention to assert the various privileges you've
2 invoked to all questions we ask you about your post-January 6th communications
3 regarding January 6th or the 5th?

4 A Yes. Yes.

5 Q And how would those questions implicate the various privileges that you've
6 invoked?

7 A I invoke.

8 Q And what criminal statutes are potentially implicated by your truthful
9 answers about your post-January 6th communications?

10 A I invoke.

11 Q And, to be clear, are you asserting a Fifth Amendment privilege in response
12 to all questions regarding your post-January 6th communications because you have a
13 good-faith belief that answers to those questions might expose you to possible criminal
14 exposure?

15 A Yes.

16 [REDACTED] And do any investigative counsel have a question on this
17 topic?

18 All right.

19 BY [REDACTED]

20 Q Ms. Fancelli, were you aware of the size of the previous rallies that Women
21 for America First held prior to January 6th?

22 A No.

23 Q If I said they were quite small, maybe a few thousand, would you have any
24 reason not to believe that?

25 A I don't -- what was the name of this group?

1 Q Women for America First. They're one of the groups -- I believe you paid
2 them \$300,000. That was your donation to them.

3 A And what was your question?

4 Q My question was just, were you familiar with their previous rallies that they
5 had held in Washington, D.C., prior to --

6 A No.

7 Q -- January 6th?

8 A No.

9 Q Okay. Their rallies were relatively small in comparison to what happened
10 on the 6th.

11 Were you aware of the events that Ms. Chafian had put on previously at Freedom
12 Plaza, the rallies that she had organized?

13 A No.

14 Q They were also very, very small and largely located in Freedom Plaza.
15 Were you aware of the events that Turning Point Action had put on before?

16 A No.

17 Q And the reason I ask this is because these rallies were very, very small in
18 comparison to the event that happened on the Ellipse. And my question is, did you have
19 any discussions with people about the ramifications of crowd-building or advertising or
20 trying to get as many angry people into the Ellipse on January 6th --

21 A No.

22 Q -- prior to that day?

23 A No. No.

24 Mr. Childers. You've got to let [REDACTED] finish the question.

25 The Witness. Sorry. But it's triple no.

1 [REDACTED] I accept triple noes. That is fine. We can say "emphatic no."

2 And I guess the question that I have is -- that we were hoping that you could
3 answer was: Nobody can tell us what you wanted January 6th to be when you donated
4 that \$3 million -- nobody can tell us that but you. And that's probably one of the most
5 important questions that we had for you.

6 Mr. Childers. She has a question for us. Hang on one second.

7 [Discussion off the record.]

8 Mr. Childers. All right. [REDACTED] can you please ask that question one more
9 time?

10 [REDACTED] Yes. I mean, my question -- the question is: When you donated
11 the \$3 million for this event, what did you want the event on January 6th to be?

12 The Witness. I invoke.

13 [REDACTED] Was there a way I could've phrased that that you actually would've
14 answered and I just screwed up?

15 Mr. Childers. Well, [REDACTED] if I could, if I may respectfully suggest --

16 [REDACTED] Yeah, because we will accept any help that you guys can give us. I
17 think we've had extensive conversations about this, and if there is any input that she can
18 give us in terms -- like, if there's anything that she can give us, like, tell us the way that we
19 can ask it.

20 Mr. Childers. Ask her if she had any intention for the rally besides it being a
21 peaceful First Amendment protest.

22 The Witness. Not protest.

23 Mr. Childers. Or --

24 The Witness. Rally.

25 Mr. Childers. Thank you.

1 The Witness. Never heard that word before.

2 Mr. Childers. Let me say it again. So ask her if she had any intention for the
3 rally in advance of January 6th other than a peaceful rally.

4 [REDACTED] Ms. Fancelli, did you intend the rally on January 6th to be anything
5 other than peaceful?

6 The Witness. No.

7 [REDACTED] Okay.

8 The Witness. I didn't.

9 [REDACTED] Could you give us -- could we take, like, a 5-minute comfort/bathroom
10 break just to kind of regroup and see where we're at?

11 The Witness. Sure. That's great.

12 Mr. Childers. Sure.

13 [REDACTED] Okay. Thank you.

14 [Recess.]

15 [REDACTED] Let's go back on the record.

16 BY [REDACTED]

17 Q So, Ms. Fancelli, you mentioned that it was your goal for the January 6th
18 event to be peaceful, correct?

19 A Yes.

20 Q Yeah. But prior to January 6th, you were a fan of Alex Jones, correct?

21 A I invoke.

22 Q And you watched Alex Jones's programs repeatedly, correct?

23 A I invoke.

24 Q And you had long conversations with Alex Jones in the lead-up to
25 January 6th. Isn't that correct?

1 A I invoke.

2 Q And you donated hundreds of thousands of dollars to Alex Jones --

3 [REDACTED] Two hundred.

4 BY [REDACTED]

5 Q -- \$200,000 to Alex Jones, correct?

6 A I invoke.

7 Q And, Ms. Fancelli, I want to -- as you may know, Alex Jones spoke on
8 January 5th at another rally that was connected, that he used the money that he got from
9 you, in part, to pay for. And I want to read you some of the words that he stated on
10 January 5th.

11 He said, quote, "We have only begun to resist the globalists. We have only
12 begun our fight against their tyranny. They have tried to steal this election in front of
13 everyone," end quote.

14 And he also says on January 5th, quote, "I don't know how this is all going to end,
15 but if they want a fight, they better believe they've got one," end quote.

16 Now, you would agree that those aren't peaceful words, correct?

17 The Witness. Stop it.

18 Mr. Childers. Hang on one second.

19 [Discussion off the record.]

20 Mr. Childers. All right. Could you -- I know that was a lot, but would you mind
21 repeating that?

22 BY [REDACTED]

23 Q So I said, on January 5th, at an event that Mr. Jones used your money to
24 fund as a lead-up to January 6th, he says, quote, "We have only begun to resist the
25 globalists. We have only begun our fight against their tyranny. They have tried to

1 steal this election in front of everyone," end quote.

2 And he also says, quote, "I don't know how this is all going to end. But if they
3 want a fight, they better believe they've got one," end quote.

4 Would you agree with me that those aren't peaceful words?

5 A I invoke.

6 Q And the next day, InfoWars posts a video -- so that'd be January 6th -- of him
7 with the crowd and says, quote, "We declare 1776 against a new world order. We need
8 to understand we're under attack, and we need to understand this is 21st-century
9 warfare and get on a war footing."

10 Would you agree again that, leading up to January 6th, those are not peaceful
11 words?

12 A I invoke.

13 Q And I'll note, Ms. Fancelli, you noted you wanted a peaceful rally, but in the
14 text messages between you and Ms. Wren, as you can recall, Ms. Wren tells you, quote, "I
15 don't know everyone and everything I've seen was peaceful. But the images are awful."
16 And in response to "the images are awful," you say, "What images?", and respond,
17 "Where are Rodger and Alex speaking?"

18 So is it fair to say that, after at least -- not saying you had the knowledge -- but
19 after Mr. Jones -- well, let me rephrase that: that it was so important to you that
20 Mr. Jones and Mr. Stone speak at the rally, that even after hearing the event you paid for
21 had awful images coming from it, your number-one concern was whether they would be
22 on the stage. Isn't that fair?

23 A I invoke.

24 Q And you noted you wanted the rally to be peaceful, but the individual -- if we
25 turn -- well, we don't have to get the document, but I will refer back to exhibit 19. And

1 the email that sent Caroline Wren after the attack on the U.S. Capitol is yet again an Alex
2 Jones video where you looked at him to lay out what really happened at the U.S. Capitol.
3 Isn't that correct?

4 A I invoke.

5 [REDACTED] Ms. Fancelli, did you call Mr. Jones and say, this isn't what I wanted,
6 this invasion of the Capitol, thousands of people marching and kicking in the doors? Did
7 you say to a single person, this isn't the peaceful event that I donated \$3 million for?

8 The Witness. I invoke.

9 [REDACTED] At this time, that concludes the deposition, and we can go
10 off the record.

11 [Discussion off the record.]

12 [REDACTED] If we have the court reporters, can we go back on the
13 record for just one quick housekeeping matter?

14 Ms. Fancelli, just a housekeeping matter that I discovered. Because you do
15 have -- there are pending objections to our questions, that you have invoked various
16 privileges, technically the deposition remains open, because those implications of
17 privileges will have to be ruled on at a future date by the chairman of this committee.

18 So we're done for today's questioning. As a broader matter, the deposition
19 remains open as we resolve the various objections that you put forward towards the
20 committee.

21 Does that make sense?

22 The Witness. Yes.

23 Mr. Childers. It's fine. We'll make sure there's no questions afterwards.

24 [REDACTED] Okay. Thank you so much.

25 Okay. We can go back off the record.

1 [Whereupon, at 3:22 p.m., the deposition was recessed, subject to the call of the
2 chair.]

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Certificate of Deponent/Interviewee

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

Witness Name

Date