

STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT

STATE OF NEW MEXICO, ex rel,
MARCO WHITE, MARK MITCHELL,
and LESLIE LAKIND,

Plaintiff,

v

No. D-101-CV-2022-00473

COUY GRIFFIN,

Respondent.

Deposition of Couy Griffin
July 20, 2022, 11:00 a.m.
500 4th St. NW, STE. 105
Albuquerque, NM 87102

PURSUANT TO THE NEW MEXICO RULE OF CIVIL PROCEDURE, this
Deposition was:

TAKEN BY: JOSEPH GOLDBERG
ATTORNEY FOR THE PLAINTIFF

REPORTED BY: KRISTINE KACZOR, RPR
NEW MEXICO CCR #545
PAUL BACA COURT REPORTING
500 4TH ST. NW STE. 105
Albuquerque, NM 87102

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APPEARANCES

For the plaintiff:

Joseph Goldberg
20 First Plaza NW, Suite 700
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jg@fbdlaw.com
[via Zoom teleconference]

For the defendant:

Pro se

Also present:

Christopher Dodd, ESQ.
Harrison McBride
Donald Sherman, ESQ.
Nikhel Sus
Stuart McPhail
Daniel Small

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1 Wednesday, July 20, 2022 11:00 a.m.

2 Albuquerque, New Mexico

3 -o0o-

4 THE REPORTER: To our witness, please raise
5 your right hand, Ms. Griffin.

6 COUY GRIFFIN,

7 having been first duly sworn was examined and
8 testified as follows:

9 THE WITNESS: Yes, I do.

10 EXAMINATION

11 BY MR. GOLDBERG:

12 Q Good morning, Mr. Griffin. My name is Joe
13 Goldberg, I'm a lawyer in Albuquerque New Mexico.
14 I'll be asking you questions today in this
15 deposition. With me assisting with the exhibits, is
16 Chris Dodd. You can see him, he's the younger
17 handsome looking guy over there, and he's a lawyer
18 also in Albuquerque, New Mexico.

19 As you heard before we went on the record,
20 there are other lawyers, who are observing this
21 deposition but are not participating in it. Will
22 you state your full name for the record,
23 Mr. Griffin?

24 A Couy Dale Griffin.

25 Q Can you spell out the first name and the

1 last name?

2 A C-O-U-Y is the first name. G-R-I-F-F-I-N
3 is the second name -- is the last name.

4 Q Where do you presently live, Mr. Griffin.

5 A In Tularosa, New Mexico.

6 Q Can you give me your address, that address?

7 A Yes, Sir. [REDACTED]
[REDACTED]

9 Q Thank you. Have you ever been deposed
10 before, Mr. Griffin?

11 A No, sir.

12 Q Have you ever been involved in any other
13 litigation before, other than this case, or the
14 criminal proceedings in the District of Columbia,
15 arising from the gee ore activities on January 6?

16 A Well, I went through a divorce in 2019, I
17 believe. So, yeah --

18 Q That counts --

19 A -- outside of those proceedings, not that I
20 can recall.

21 Q So we'll talk about your divorce a little
22 bit later on in the deposition. I'm going to go
23 over some commonly understood ground rules about
24 depositions, since this is a new experience for.
25 You understand that you've just taken an oath to

1 tell the truth, and that that means that you are
2 required to answer all the questions here fully and
3 truthfully. You understand that?

4 A Absolutely.

5 Q Because this is a remote deposition, in
6 these modern times, you have to have your camera on
7 at all times during the deposition, and you must
8 remain unmuted at all times during the deposition,
9 unless we are taking a break. And if we take a
10 break, it will be announced and the court reporter
11 will say we're on break and then resuming. Do you
12 understand that?

13 A I understand.

14 Q In every day conversation, it is often
15 common for people to interrupt each other and talk
16 all over each other. That's just the way we are.
17 That makes it very hard for the court reporter. So
18 we will try, you and I, not to talk over each other.
19 That meaning you will wait until I finish asking the
20 question, and I will wait to finish -- for you to
21 finish answering the questions, or at least we both
22 will try to do that. Do you understand that?

23 A I understand.

24 Q The court reporter will thank you for that.
25 If you don't understand any of my questions, please

1 tell me. Because otherwise I am going to assume
2 that you do understand my questions. And if you
3 don't understand my question, tell me and I will try
4 to identify what the problem is, and ask the
5 question differently. After this deposition is
6 over, you will be provided an opportunity to review
7 the transcript. The court reporter is going to be
8 taking down every question that I ask; all the
9 answers that you give; any other statements or
10 comments that anybody makes during this deposition.
11 And that's going to be fully transcribed. You're
12 going to have the opportunity to review that
13 transcript and make any corrections. Those
14 corrections mean that you don't get a chance to
15 change your testimony, but if the -- you're looking
16 to see if the court reporter misspelled something or
17 didn't get it right, then you can make those
18 changes. Do you understand that?

19 A I understand.

20 Q If you make any changes to your transcript,
21 I'll have the opportunity, Mr. Griffin, to make a
22 comment on those changes if I think that those
23 changes are -- raise an issue. While this is a
24 formal proceeding, I don't get dressed up in a tie
25 and collared shirt that much any more. I notice

1 that you're wearing a jacket and tie. Mr. Dodd is.
2 This formal proceeding, you're under oath.

3 This is a court proceeding in sorts, of
4 sorts, but it's also we're not in Court, so we will
5 take breaks. My practice is generally to take a
6 break about every hour and a half. But any time you
7 want a break, please let me know, and we'll take a
8 break whenever you want to take a break, okay?

9 A I understand.

10 Q So sometime around halfway into this
11 deposition, that will probably be early to
12 midafternoon, we'll take a longer break for lunch
13 and to give the court reporter a break from her job
14 of transcribing our words. Do you have any
15 questions about these proceedings so far?

16 A No, sir.

17 Q If anything arises, if anything arise,
18 please ask the question and we'll try and deal with
19 it. I see that a Harrison McBride has logged on to
20 these proceedings. Will you identify yourself?

21 MR. McBRIDE: I am a paralegal for Dan
22 Small.

23 MR. GOLDBERG: Thank you.

24 Q (BY MR. GOLDBERG) You're here today in
25 response to a deposition notice that you received in

1 this case. Is that correct?

2 A That's correct.

3 Q I'm showing you what we've marked as
4 Exhibit 1 to your deposition. Chris, if you'll put
5 that up on the screen. While this is going on, I'll
6 tell you that, what we're going to do is we're going
7 to show you these exhibits. These exhibits are
8 going to be copies of, paper copies, hard copies of
9 paper or whatever. There's going to be a bunch of
10 videos also. You'll get a chance to review them,
11 and I'll ask you. They'll go up on the screen.
12 Exhibit 1 is three pages. Please take whatever time
13 you want to review it. My question to you is, is
14 this the notice to take the deposition that you
15 received from Mr. Dodd on or around July 1?

16 (Deposition Exhibit No. 1 marked.)

17 A Yeah.

18 Q Subsequently received one or more e-mails
19 from Mr. Dodd, did you not, reminding you of the
20 deposition and offering instructions on how to
21 attend a deposition remotely, correct?

22 A That's correct.

23 Q Do you have any physical or mental
24 conditions that would interfere with your ability to
25 testify fully and truthfully today?

1 A Not that I'm aware of.

2 Q Have you taken any medication, whether it's
3 prescription medication or over-the-counter drugs,
4 in the last 24 hours that you believe would affect
5 your ability to testify fully and truthfully?

6 A No, sir.

7 Q Is there any other reason why you feel you
8 cannot testify fully or truthfully today?

9 A No.

10 Q You understand that this deposition is
11 being taken in the case of Marco White and others
12 against you, Couy Griffin, filed in a New Mexico
13 First Judicial Court in Santa Fe? You understand
14 that?

15 A Yes, sir.

16 Q Do you presently have a lawyer representing
17 you in this case?

18 A No.

19 Q Do you know the Barnett Law Firm in
20 Albuquerque, New Mexico?

21 A I do.

22 Q Do you know Mickey Barnett, who is one of
23 the owners of the Barnett Law Firm?

24 A No, not personally.

25 Q Do you know Diego Esquibel, another lawyer

1 **at the Barnett Law Firm?**

2 A I do know Diego.

3 **Q How did you come to know Diego Esquibel?**

4 A Through Barnett Law. I had another
5 attorney from Barnett Law named Colin Hunter, who's
6 representing me on a case against Secretary of
7 State, Maggie Toulouse Oliver. So I got shifted to
8 Diego through the firm.

9 **Q Are you aware that at one point in this**
10 **lawsuit against you in the First Judicial District,**
11 **Mr. Esquibel filed an entry of appearance in the**
12 **case, indicating that he was representing you?**

13 A I believe so, yes.

14 **Q Do you know how that came about?**

15 A I think it was -- I think it was through
16 Nicholas Smith, another -- my attorney from
17 January 6. I think that was something that they
18 worked out between them.

19 **Q You were aware, are you not Mr. Griffin,**
20 **that Mr. Esquibel subsequently filed papers to quit**
21 **representing you in this case?**

22 A That's correct.

23 **Q And you opposed Mr. Esquibel's request,**
24 **correct?**

25 A No.

1 Q You did not?

2 A No.

3 Q You mentioned Nick Smith. You know
4 Mr. Smith, a lawyer in both New York and Virginia?

5 A That's correct.

6 Q Mr. Smith represented you in the criminal
7 proceedings arising from your participation in the
8 events at the United States Capitol on January 6,
9 2021, correct?

10 A That's correct.

11 Q How did Mr. Smith come to represent you in
12 those criminal proceedings, Mr. Griffin?

13 A Just through the Public Defender's Office,
14 yeah.

15 Q Did you request the Federal Court in D.C.
16 to appoint Mr. Smith to represent you in those
17 criminal proceedings, because you did not have the
18 financial resources to hire a lawyer yourself?

19 A I didn't request Nicholas Smith. I didn't
20 request him particularly. I just didn't have
21 counsel and, yeah, didn't have an attorney and one
22 was provided for me. It happened to be Nicholas.

23 Q Do you recollect that the judge asked you
24 whether you had the reoccurs to hire your own
25 attorney?

1 A Probably. I don't recollect a particular
2 conversation but, you know, I was in solitary
3 confinement and the conditions were very harsh and
4 severe in solitary confinement. So, yeah,
5 everything was, kind of, kind of a blur at that
6 time.

7 **Q Do you represent telling the judge in D.C.**
8 **when you asked you if you had the financial**
9 **resources to hire a lawyer that you told him that**
10 **you did not have financial resources to hire a**
11 **lawyer?**

12 A I don't remember the exact conversation,
13 but I would say that, yeah, probably because I
14 don't.

15 **Q When you told the judge that you did not**
16 **have the financial resources to hire a lawyer, was**
17 **that a truthful statement?**

18 A Yeah, unless, you know, you can hire one
19 for a couple hundred bucks, which I don't think you
20 can. You know, I mean, that leaves a little bit of
21 -- yeah, I don't know how much attorneys cost. So
22 if I have, you know, the money in my account at the
23 time, I highly doubt because, yeah, I'm not a rich
24 man, or I'd have an attorney today.

25 **Q Did you ever -- did you ever pay Mr. Smith**

1 or his law firm any money to represent you in those
2 criminal proceedings?

3 A Not in the January 6 criminal proceedings,
4 no.

5 Q And Mr. Smith also represented you in this
6 case while the proceedings were in Federal Court in
7 the Federal District Court in New Mexico. Isn't
8 that correct?

9 A Say again. What was it?

10 Q Let me say it again. Mr. Smith and his law
11 firm represented you in this case. Marco White
12 versus Couy Griffin.

13 A Sure.

14 Q In the Federal Court proceedings in Federal
15 Court in New Mexico. Is that correct?

16 A I'm not sure of the timelines. I don't
17 remember when those things ended and I'm not -- I
18 don't know well enough to respond.

19 Q All right. Let me ask it a different way.
20 Do you recollect Mr. Smith and his law firm
21 representing you in this case at any time?

22 A Yes. Yeah, yeah he was -- as far as
23 officially, I don't think that I signed any
24 paperworks, or I don't think I registered with
25 Nicholas in this. I felt like he was doing it out

1 of his good will because he knows who I am and he
2 knows the maliciousness of what's going on right now
3 legally. So I never remember signing any, kind of,
4 an official agreement with Nicholas to represent me
5 in this case right here.

6 **Q Did you ever pay Mr. Smith or his law firm**
7 **to represent you in this case?**

8 A I sent Nicholas Smith a \$5,000 retainer
9 check. How he spent it, how he used it, what he did
10 with it, I don't know. But I did send him a \$5,000
11 retainer. He may still have it in an account. I
12 don't know.

13 **Q And when you sent him that \$5,000 retainer,**
14 **what was your understanding as to what that money**
15 **was going to be used for?**

16 A For representation.

17 **Q In this case?**

18 A I didn't know. I guess, yeah. Yeah, or in
19 any future proceedings.

20 **Q In the criminal case at all?**

21 A No. I don't guess. I don't know if the
22 criminal case. Again, I don't know of the timeline
23 I don't know if the criminal case was already
24 finished. I think it was.

25 **Q When were you sentenced in this case?**

1 A On March. I was sentenced on June 17.

2 Q **Okay. Chris, can we put up Exhibit 2.**

3 THE REPORTER: I'm sorry. You are marking
4 these, correct?

5 MR. GOLDBERG: Yeah, these are all marked.

6 Q **(BY MR. GOLDBERG) Mr. Griffin, I'm showing**
7 **you Exhibit 2. This is a tweet of some time in May**
8 **or so of 2022. You've seen this tweet before, have**
9 **you not?**

10 **(Deposition Exhibit No. 2 marked.)**

11 A I'm sure if I posted it, I'm sure I have.

12 Q **Up at the top left-hand corner, it says**
13 **couygriffin@cowboycouy. That's one of your tweet**
14 **posts, right?**

15 A I would imagine so. Yes, sir.

16 Q **Would you read what's stated on that tweet**
17 **at the top?**

18 A I can't. The text is too small, and I
19 don't have my glasses on, and I left them at the
20 house, I'm sorry. Yeah, it says, Thank you to so
21 many who have given to support me in this fight. It
22 is only by your generous support can I stay in it.

23 Q **And then it says, it gives your handle,**
24 **Couy Griffin, right, you see that?**

25 A That's correct.

1 Q And then it says --

2 A Where we go one, we go all. That's what
3 the WWG1WGA stands for.

4 Q You say that you post that somewhat
5 frequently in your tweets and posts, don't you?

6 A Yeah, absolutely.

7 Q And you see the photograph? Is that a
8 photograph that you took?

9 A Yes, sir.

10 Q And that's on your desk?

11 A It's at my house, yeah.

12 Q Your house on your desk. And you see who
13 the payee of the check is?

14 A I can't see. If you can zoom it in a
15 little more. Yeah, it says David Smith PLLC.

16 Q That's Nick Smith's law firm, correct?

17 A Yes it's the one he works through, yes,
18 sir.

19 Q And if you zoom it back out, Chris. There
20 we go.

21 And that's the \$5,000 retainer that you
22 previously testified to?

23 A That's correct.

24 MR. GOLDBERG: Thank you. I'm done with
25 this now, Chris, thank you.

1 Q (BY MR. GOLDBERG) Are you aware of any
2 other lawyers who provided any help to Mr. Smith in
3 his representation of you in the criminal
4 proceedings?

5 A Am I aware of any other attorneys that did
6 what? I'm sorry.

7 Q That helped Mr. Smith?

8 A In his criminal proceedings?

9 Q In the criminal proceedings.

10 A No, sir.

11 Q Are you aware of any other lawyers who
12 helped Mr. Smith in the representation of you in
13 these proceedings, other than Mr. Esquibel?

14 A No.

15 Q Are you aware of any organizations that
16 provided any help to Mr. Smith in his representation
17 of you in the criminal proceedings?

18 A No, not that I'm aware of.

19 Q Are you aware of any organizations that
20 provided Mr. Smith with help in representing you in
21 these proceedings?

22 A No.

23 Q Did you pay Mr. Smith any money, other than
24 the \$5,000 that is reflected by the check
25 photographed in Exhibit 2?

1 A No, sir.

2 Q You are aware that when these proceedings
3 were remanded from federal court back to state court
4 in this case, Mr. Smith refused -- or did not
5 continue to represent you in the proceedings in
6 Santa Fe. You're aware of that, aren't you?

7 A That's correct, yes.

8 Q Okay. I'm going to ask this carefully. I
9 don't want to you tell me anything that Mr. Smith
10 told you. But do you have an understanding of why
11 Mr. Smith didn't -- not continue to represent you in
12 these proceedings in state court?

13 A I believe because he's not licensed in
14 New Mexico. My understanding.

15 Q Were aware that private individuals sought
16 to raise funds for your legal defense?

17 A No. You know, I know that there's a lot of
18 people that would like to help. And, yeah, but on
19 what platforms, where they do it, I'm not aware.

20 MR. GOLDBERG: Would you put up Exhibit 3
21 please, Chris?

22 (Deposition Exhibit No. 3 marked.)

23 Q (BY MR. GOLDBERG) Have you seen this post
24 on the givesendgo platform. The free Christian
25 fundraising site?

1 A Free Christian fundraising? What is it,
2 no.

3 **Q Givesendgo?**

4 A Oh, yeah, on givesendgo, yeah. I have a
5 givesendgo account that was started for me by -- two
6 of them, as a matter of fact. One was started by
7 Dan -- a friend of mine, who started the fund, not
8 only for legal defenses but also to just help me out
9 financially to get through this season that I'm in,
10 because it's very difficult financially.

11 **Q And so would you read -- can you read**
12 **what's stated under the photograph there?**

13 A No, I can't. I can't see it.

14 **Q Mr. Dodd is going to enlarge that for you.**
15 **Can you read that?**

16 A Yeah, but, yeah, let's see. If you stop it
17 right there, I think I can.

18 (As read) It says, Couy Griffin Cowboys for
19 Trump is American patriot who is being attacked by
20 the D.C. injustice system simply for praying at the
21 US Capitol on January the 6th. As the left ignored
22 BLM and Antifa burning down our country for four
23 years, and committed treason with their failed coup
24 attempts against President Trump. They are going
25 after Patriots like Couy for simply loving God,

1 family, and country, and wanting to get to the
2 bottom of election fraud. We must stand with our
3 fellow Patriots. Stand with Couy and help him bear
4 the injustice! The cost to fight his legal battles
5 will be large, but --

6 **Q You can stop now. This is fine. That's**
7 **fine. If you go back, it says there that \$49,989**
8 **was raised by Mr. Bergquam in this fundraising. Did**
9 **you get that \$49,989?**

10 A No. As I mentioned, the fund wasn't only
11 set for legal fund. It was also to help me get
12 through this time that I'm in right now, because
13 financially I'm destitute. If I wasn't destitute
14 financially, I would have an attorney represent me
15 right now. I mean, every dime of that money was
16 spent electronically, digitally, and I could give an
17 account for every dollar that was spent.

18 Because not only is the cost that is
19 considered here for actual attorney fees, but you
20 also have to remember that I have to travel to
21 Washington D.C. I have lodging. I have meals. I
22 have travel expenses, and that's all part of this
23 legal fight. So to narrow it all down just for
24 checks given to attorneys, is not why this money was
25 given. It was given to me to help me through the

1 legal process which is more broad in scope.

2 Q On Exhibit 2, Mr. Griffin, we saw a check
3 to the Smith Law Firm for \$5,000. And here on
4 Exhibit 3, we see a check to the Barnett Law Firm,
5 and it says also for \$5,000. Do you see that?

6 A Yes, sir.

7 Q And that's your handwriting. Isn't it,
8 Mr. Griffin?

9 A That's correct. Uh-huh.

10 Q So you paid the Barnett Law Firm \$5,000
11 also, correct?

12 A That's correct.

13 Q For what purpose?

14 A For representation.

15 Q Representation in which case?

16 A I'm not sure right now.

17 Q The Barnett Law Firm didn't represented you
18 in your criminal proceedings, did it?

19 A No, sir. Oh, well, yeah, sure did. And,
20 you know, I am criminally charged by the State of
21 New Mexico right now as well. So, yes, you can say
22 that the Barnett Law Firm has represented me in
23 criminal proceedings.

24 Q The Barnett Law Firm didn't represent you
25 in the criminal proceedings arising from your

1 activities -- the criminal proceedings in the
2 District of Columbia arising from your activities on
3 January 6, 2021. That's correct, isn't it?

4 A That's right.

5 Q All right. And the Barnett Law Firm -- is
6 the \$5,000 to represent -- to pay the Barnett Law
7 Firm for representing you in this case?

8 A What was it?

9 Q I'll ask the question, again. Is the
10 \$5,000 that's reflected by this check that we see on
11 Exhibit 3, made out to the Barnett Law Firm, is it
12 to pay them to represent you in this case, in these
13 proceedings, which this deposition is being held?

14 A No. But it was paid to represent me in
15 criminal proceedings from the Secretary of State,
16 the State of New Mexico.

17 Q Which proceedings are those, Mr. Griffin?

18 A A lawsuit that the Secretary of State has
19 pressed against me; trying to force me to register
20 as a political action committee whenever I don't --
21 first off, don't meet any of those legal
22 requirements of the political action committee. So
23 I have legally challenged that because, again, I
24 don't meet the legal constitutional requirements of
25 a political action committee. I'm simply a support

1 group for President Trump, and his America First
2 Agenda.

3 Q Have you paid the Barnett Law Firm any
4 additional money besides that \$5,000 to represent in
5 that proceeding or any other?

6 A Yes, I have.

7 Q How much more have you paid them?

8 A I can't recall, but it's significant.

9 Q Did any of that money come from the \$49,000
10 or so, that was raised by Mr. Bergquam in the
11 gofundme -- givesendgo?

12 A I'm not fully aware. Possibly.

13 Q Did you get all -- is all of that \$49,989
14 been expended?

15 A Yeah, all but about probably six or \$700.

16 Q Can you tell me today how much of that was
17 expended on lawyers?

18 A No, I don't know.

19 Q Was there any amount of that money expended
20 on lawyers besides the \$5,000 to the Smith Law Firm
21 and the \$5,000 to the Barnett Law Firm?

22 A It was more than \$5,000 to the Barnett Law
23 Firm. I'm not -- not that I can recall. I'm not
24 sure.

25 Q Did you use any of the \$49,989 for your own

1 living expenses?

2 A I'm not sure. Possibly.

3 Q But the givesendgo money raising effort by
4 Mr. Bergquam, am I pronouncing his name correctly?

5 A I believe so.

6 Q Is not the only fundraising effort on this
7 platform, that is the givesendgo platform, on your
8 behalf, is it?

9 A That's correct. I already -- I told you
10 that just a second ago. I said there was two
11 different accounts.

12 MR. GOLDBERG: Let's put up Exhibit 4,
13 Chris.

14 Q (BY MR. GOLDBERG) I'm showing you what
15 we've marked as Exhibit 4 to your deposition.

16 Again, you've seen this before?

17 (Deposition Exhibit No. 4 marked.)

18 A Yes, sir, I have. I believe.

19 Q And this is another fundraising effort on
20 your behalf on the givesendgo platform. This time
21 created by Ms. Carissa Keshel. I don't know how to
22 pronounce it right.

23 A That's correct.

24 Q It says about 12,000, at least as of the
25 time of this posting. \$12,761 was raised. Is that

1 **about right to your recollection?**

2 A Probably so.

3 **Q Do you know whether anymore money was**
4 **raised?**

5 A No. Not that I'm aware of.

6 **Q Has all that money been spent?**

7 A Yeah.

8 **Q What was it spent on?**

9 A I'm not entirely sure. But as I had
10 mention, it's all -- all of the money that's been
11 raised and spent, has been so -- been only through
12 two different accounts, personal accounts. And all
13 that money is, you know, can be accounted for. It's
14 digitally -- can digitally be tracked. And, again,
15 I can give an account for all of it, the way it was
16 spent.

17 **Q To your knowledge, were there any other**
18 **fundraising campaigns created on the givesendgo**
19 **platform besides the one by Mr. Bergquam, and**
20 **Ms. Keshel?**

21 A Not that I'm aware of.

22 **Q Are you aware of any other fundraising**
23 **efforts on your behalf to help you defray your legal**
24 **expenses or otherwise, your expenses?**

25 A There was a fund that was started for me

1 whenever I was in detention in Washington D.C. And
2 as soon as I got out of detention, I asked for that
3 platform to be removed and taken down. I didn't
4 have anything to do with setting it up. And I
5 didn't handle any of the money that was transferred
6 if there was any. I don't even know.

7 **Q So at least as to that third fundraising**
8 **effort, you never saw any money from that third**
9 **fundraiser?**

10 A No.

11 **Q Do you know what platform it was on?**

12 A No.

13 **Q You stated at the beginning of your**
14 **deposition the address where you live. Are you**
15 **there now?**

16 A No. I'm at my county office right now.

17 **Q Where you live, is that your residence?**

18 A Yes, sir.

19 **Q Do you own that residence?**

20 A That's correct -- well, I'm buying it. I
21 don't own it.

22 **Q Okay. But you're not renting it from**
23 **somebody?**

24 A No.

25 **Q You're buying it?**

1 A Yeah.

2 **Q Are you presently employed, other than at**
3 **the Otero County Commission?**

4 A No. I try to work if I can. My family has
5 the stone masonry business. And when I can, I try
6 to help them, but it's been a long time since I've
7 been able to work.

8 **Q Was your family also involved in lumber and**
9 **sawmilling?**

10 A That's what I was raised doing. My family
11 -- I was raised in sawmilling business until our
12 business was shut down by the Endangered Species Act
13 and the Mexican Spotted Owl and Big Federal
14 Government. It's a struggle from -- it's a struggle
15 from where I'm now.

16 **Q Where was that sawmill?**

17 A In Reserve, New Mexico.

18 **Q And who owned the sawmill?**

19 A My dad, Dwayne Griffin.

20 **Q Your dad did. And when was that sawmill**
21 **closed down, or left the ownership of your dad?**

22 A No, it hadn't left ownership of my dad. We
23 still have the sawmill, we just can't get access to
24 timber, because the federal government has refused
25 us access to timber.

1 Q So the sawmill is still owned by your dad
2 but it's not -- is it operating at all?

3 A No.

4 Q Do you currently have any other sources of
5 income, besides whatever income you make Otero
6 County Commissioner and the fund raising efforts
7 that we just talked about?

8 A No, I make 22 -- about twenty -- roughly
9 \$22,000 a year from Otero county. And that's all
10 the income that I have. And the money that's given,
11 through these fund raising efforts all goes back
12 into the areas in which it's given. I travel a lot,
13 I haul my horse, I have -- I don't even -- my
14 truck's in the shop right now, I can't even get my
15 pick up out of the shop. I owe \$2,200 bill on it.
16 So you know, in regards to that, I mean, I had a
17 lady give me \$4,000 to help with mechanical expenses
18 and she gave it through the givesendgo account
19 because that was just away to transfer the money.
20 So, but it was specifically given to fix my pick up,
21 so you know, if you want to get tangled up in, you
22 know, the money, like I'm mishandling money that was
23 given through givesendgo. There was a lot of people
24 that gave money to me, to help support me through
25 this time that I'm in, like mechanical problems with

1 my truck and such, and they simply used givesendgo a
2 platform to transfer money through.

3 Q Okay. I understand. You were raised in
4 New Mexico is that correct?

5 A That's correct.

6 Q And is my memory correct, that you attended
7 New Mexico State University for a while?

8 A For a short time.

9 Q But you did not graduate from New Mexico?

10 A That's correct.

11 Q Have you graduated from any institution of
12 higher education?

13 A No, sir.

14 Q Can you -- going backwards from now, and
15 you've testified that your work is -- your sources
16 of income is primarily the Otero county commission.
17 Going backwards to the point of time when you left
18 New Mexico state university can you just tell me
19 what you you recollect as the employed positions
20 that you have held?

21 A Yeah, I -- I've worked after New Mexico --
22 after college, I lived in Paris, France. I worked
23 for about five and a half years for Euro Disney, in
24 Paris. After that, I spent a number of years of my
25 life in evangelism, street evangelism, where I road

1 horseback from San Francisco, California to
2 Jerusalem, Israel in an effort to share the gospel
3 and tell others about the saving grace of knowledge
4 of the Lord, Jesus Christ. And after I completed
5 the horseback trip through the old city of
6 Jerusalem, I returned back to the states. I think I
7 sold cars for a short amount of time at Don Chalmers
8 Ford in Albuquerque and then -- or maybe that was
9 before I took the -- maybe that was before I made
10 the horseback ride, anyways I worked for for Don
11 Chalmers Ford for a while as a sales associate. And
12 then I guess after the horseback ride, I came back,
13 I helped my dad a little bit, I did day work, side
14 jobs, worked for where I could. And then I answered
15 a call to pastor a church, I pastored New Heart
16 Cowboy Church in Alamogordo, New Mexico for -- I
17 was the lead pastor for about five years or so, five
18 and a half years. During that time, I started a
19 business. I opened a business, it's called Hitch
20 and Post BBQ. I that business about five years I
21 believe I grew the business into three different
22 locations, it was a successful business, but it was
23 very difficult to function with all the heavy
24 taxation and regulations and such, that the
25 government, through bar certified attorneys, placed

1 on top of us. And so I wanted to get involved in
2 representation, in trying to provide relief for so
3 many that were in conditions like I was in. So I
4 ran for political office and was elected as county
5 commissioner, and since that time, I tried to live
6 sacrificially. I try not to spend any money at all
7 on myself. I drive a 2006 Toyota Yaris with 260,000
8 miles on it. It looks like it should be sitting in
9 a junk yard. I have another old pick up, a 2000
10 model Dodge that has about a hundred sixty-seventy
11 thousand miles on it, and I have another 2006 Dodge
12 Cummins that I try to pull my horse trailer with
13 when we do the Cowboys for Trump stuff and it's a --
14 as I mentioned it's currently broke down right now
15 and I don't have the money to get it out of the
16 mechanic shop. I live in a 1976 double wide, in
17 Tularosa, that I paid \$100,000 for. And I still owe
18 about \$80,000 left on the mortgage, and as I
19 mentioned, I --the only real luxuries, you may call
20 it, that I have, is I have a horse that I ride, and
21 I have a horse that I was able to trade a cow for,
22 and that's my sons horse. And those horses are
23 somewhat of an expense, they cost me probably \$150
24 -- \$200 a month in feed and that's about everything
25 that I have. The horse trailer that I pull for

1 Cowboys for Trump, does not belong to me, it belongs
2 to a friend. The horse trailer that I own is an old
3 wore out stock trailer, and you know I don't have
4 much worldly possessions, I try not to live off the
5 world. I try to serve the gospel, I try to tell
6 others about the Lord Jesus Christ, and the power of
7 forgiveness, and salvation in him, and I try to
8 stand for the things that he stands for, and that's
9 freedom and liberty.

10 Q Thank you, Mr. Griffin. You stated in your
11 testimony previously that you were previously
12 married and then went through a divorce proceedings
13 with your then wife. Are you married now?

14 A No.

15 Q Do you recollect when those proceeding
16 were?

17 A Can I what?

18 Q Can you recollect approximately when your
19 divorce proceedings were? When did you get
20 divorced?

21 A When the divorce proceeding started after I
22 was served with divorce papers, after I returned
23 from Washington D.C., and the end of February 2019
24 after my first horseback ride into Washington D.C.
25 only a couple of days after I spoke to the president

1 the first time on the phone. Whenever I returned
2 from that trip to Washington D.C., as all the other
3 guys that I traveled with as they came back to
4 families that were waiting for them in the airport
5 with signs, telling them how proud they were of
6 them. I got in that little Toyota that I drive, and
7 I drove to my house and walked into an empty house
8 with divorce papers laying on my kitchen table, to
9 answer your question.

10 **Q And you testified that you're not presently**
11 **married?**

12 A No. I'm not -- no. I've been married one
13 time.

14 **Q And you testified you have a son?**

15 A That's correct.

16 **Q Is that the only child you have, the one?**

17 A Yes, sir.

18 **Q And what is his name?**

19 A His name is Gunner Griffin.

20 **Q And how old is he now?**

21 A He's 7 years old. He'll be eight in
22 September.

23 **Q And are you presently under court order**
24 **with respect to the visitation and custody rights of**
25 **your son?**

1 A There's currently a court order in place
2 but my relationship with my ex-wife is probably as
3 good if not better right now than it's ever been.
4 And we're very gracious and courteous with one
5 another. And I can have my son whenever I want
6 pretty much. And my son is with me a lot of time.

7 MR. GOLDBERG: Would you put up Exhibit 5
8 please, Chris.

9 Q (BY MR. GOLDBERG) I'm showing you,
10 Mr. Griffin, an order in the case in the 12th
11 Judicial District, that's Otero County by Kourtnie
12 Griffin, the petitioner against you, Couy Griffin,
13 the respondent. And this is an order from Judge
14 Rosner. Again, take what time you want to review
15 this, but you've seen this order before, have you
16 not?

17 (Deposition Exhibit No. 5 marked.)

18 A I'm sure I have.

19 Q And in this order, Judge Rosner makes
20 certain findings about your activities with respect
21 to your visitation and custody of your son, correct?

22 A That's correct.

23 Q Would you turn to page two, Chris, of
24 the -- would you read into the record, Mr. Griffin,
25 if you enlarge it somewhat, Chris.

1 Would you read paragraphs one through five
2 of what Judge Rosner ordered of you?

3 A I still can't read. You're going to have
4 to make it bigger.

5 Q I'll read it. Make this more quick. I'll
6 read it.

7 A That's fine.

8 Q Judge Rosner said -- you don't have to
9 enlarge that for me, Chris, you can pull back a
10 little.

11 Judge Rosner said, it is therefore ordered
12 adjudicated and decreed. One, Mr. Griffin, that's
13 you, shall remove photos of the minor child from all
14 his, that is you, your social media. Two, there
15 shall be no further manipulation of the phone or
16 face-time calls or the Court shall designate a
17 third-party monitor for all communications between
18 Mr. Griffin and the minor. Three, phone or
19 face-time calls shall be modified to two 30-minutes
20 calls daily with the minor child to occur at 7:00 to
21 7:30 a.m. and 7:00 to 7:30 p.m., So as long as as
22 there is no manipulation by Mr. Griffin of the minor
23 child. Four, this order shall be temporary until
24 there is some type of break in the COVID 19
25 regulations. Five, all 11-706 expert shall

1 appointed to perform a custody evaluation.

2 Do you remember receiving that order from
3 Judge Rosner, correct?

4 A Yeah, I'm sure. If it was a Court order,
5 I'm sure I did.

6 Q And are you still abiding by that Court
7 order?

8 A As I mentioned, my ex-wife and I, thank
9 God, we get along better now than we probably ever
10 have, and we have been able to stay outside of the
11 court system, and we've been very gracious with one
12 another as far as the handling of our son, and we've
13 done everything in his best interest. And his best
14 interest is for his mom and his dad to get along and
15 be civil with one another; and to love him; and to
16 love one another; and that's what we've been able to
17 do.

18 Q You testified previously that you ran for
19 the Otero County Commission. That was in 2018,
20 correct?

21 A That's right.

22 Q And you were sworn in as a Commissioner for
23 Otero County New Mexico on December 28, 2018,
24 correct?

25 A That's correct.

1 **Q And you still hold that Office, don't you**
2 **Mr. Griffin?**

3 A After failed recall attempts and demands
4 for me to resign from attorney general and everybody
5 who doesn't like my politics, by God's grace, I'm
6 currently still the District Two County Commissioner
7 of Otero County.

8 **Q When does your term of office expire?**

9 A At the end of this year.

10 **Q And you've indicated, have you not, that**
11 **you do not plan on running to retain that office,**
12 **correct?**

13 A Not to retain this office. Absolutely.

14 **Q Why did you decide not to run again?**

15 A Probably because of the attacks like I'm
16 going through right now. All the political
17 vindictiveness and all of the scum bag attorneys
18 that use their places or positions to try to attack
19 me and try to make me out to look like a horrible
20 person. I suffer whenever I go out into the
21 community whenever I go to places like Wal-Mart and
22 departs store, I receive verbal attacks from people
23 slandering me and saying that I'm things that I'm
24 not.

25 And so that's one of the reasons why I've

1 chosen not to run again because this has been the
2 hardest season I've ever been in in my life, and I
3 don't know if I have the mental capacity or the
4 stamina to go through another four years of the,
5 kind of, vicious and malicious attacks that I've
6 been going through. It's very traumatic.

7 **Q Am I one of these attorneys that you're**
8 **talking about that are slandering you?**

9 A I didn't say you were. I'm just saying
10 there's a lot of them out there.

11 **Q But that's why I'm asking.**

12 A I didn't think you were.

13 **Q Okay. Great. On December 28, 2018, you**
14 **swore an oath to support the United States**
15 **constitution among others, is that not correct?**

16 A 100 percent.

17 MR. GOLDBERG: Would you put up Exhibit 6
18 please, Chris?

19 **Q (BY MR. GOLDBERG) You've seen Exhibit 6**
20 **before?**

21 **(Deposition Exhibit No. 6 marked.)**

22 A I'm not sure. I can't see. It's too
23 small.

24 **Q You see that? Can you read it?**

25 A Yeah, I think. Zoom it a little bit more.

1 **Q Would you read it?**

2 A Yeah, now I can.

3 **Q Would you read it into the record, please?**

4 A (As read) I, Couy Griffin, having been
5 elected to serve Otero County Commissioner for the
6 County of Otero State of New Mexico do solemnly
7 swear and affirm that I will support and uphold the
8 constitution and laws of the State of New Mexico and
9 the constitution of the United States. And I will
10 faithfully and impartially discharge the duties of
11 the office to which I have been elected to the best
12 of my ability. So help me God.

13 **Q Is that your signature over the line?**

14 A That's correct.

15 **Q Okay. And it was sworn statement by you
16 and notarized by Judge Schneider, correct?**

17 A That's right.

18 **Q At the time that you took this oath of
19 office in December 2018, Mr. Griffin, what did it
20 mean to you when you swore to defend the
21 constitution of the United States?**

22 A It means the same thing that it does to me
23 today. And that's just to stand up and do all I can
24 to defend liberty, and freedom, and the pursuit of
25 happiness. I feel that I have done that. And those

1 that don't like liberty and freedom and happiness
2 and want people to be oppressed through
3 unconstitutional mandate such as the COVID mandates,
4 which are unconstitutional. I stood in the gap, and
5 I defended those freedoms and defended those
6 liberties and those tyrants that want to oppress
7 people. They hate me for it. That's why one of the
8 reasons I believe I come under such attack.

9 **Q Those tyrants that you just referred to,**
10 **who are you talking about?**

11 A I'm talking about upper level leader that
12 want to enforce unconstitutional laws.

13 **Q Can you identify some of them for me right**
14 **now?**

15 A No. No.

16 **Q How about the Governor of the State of**
17 **New Mexico, is she a tyrant?**

18 A Well, I guess that's all to be debated.

19 **Q Well, you used the term. That's all I'm**
20 **asking you --**

21 A And I didn't call her one.

22 **Q I'll ask the question, and then I'm going**
23 **to ask you to answer the question. When you used**
24 **the word tyrant in your previous answer, did you**
25 **intend to include the governor of the State of**

1 **New Mexico?**

2 A No, I don't. I didn't intend to include
3 her.

4 Q **How about the President of the United
5 States. President Joseph Biden. Do you consider
6 him a tyrant?**

7 A No. I didn't say that I consider him one.
8 That's all to be debated.

9 Q **But I'm asking you now under oath.**

10 A I know.

11 Q **You swore to tell the truth here. I'm
12 asking, do you consider the President of the United
13 States, Joseph Biden, to be a tyrant?**

14 A No. I didn't consider him one. I didn't
15 specifically name him, I should say.

16 Q **But I'm asking you a different question.
17 As you're sitting here today, testifying under oath
18 to tell the truth, do you consider Joseph Biden as
19 the President of the United States to be a tyrant?**

20 A I don't think -- I don't know him well
21 enough to be able to affirm that or not.

22 Q **As you sit here today, testifying under
23 oath, Mr. Griffin, do you consider Joseph Biden to
24 be the President of the United States?**

25 A And as I mentioned, I can't say yes or no

1 because I don't know him well enough.

2 Q I'm asking you a different question.

3 A Okay.

4 Q Do you consider Joseph Biden, sitting here
5 today testifying under oath, do you consider Joseph
6 Biden to be the President of the United States?

7 A And as I responded in my previous question,
8 I can't fairly answer that question because I don't
9 know him well enough.

10 Q So let me ask the question in a different
11 way. Sitting here today under oath, you refuse to
12 confirm that you accept Joseph Biden as the
13 President of the United States?

14 A There's a lot of speculation in regards to
15 the elections and the fraud that took place in the
16 elections, so until there's a thorough investigation
17 into our electorate including the Dominion Voting
18 machines and the dropped off, the mail-in ballots,
19 and the drop-off boxes. Until there's a thorough
20 investigation that takes place, I fall short to be
21 able to answer that question.

22 Q When you say you fall short to be able to
23 answer that question, are you testifying that you
24 refuse to confirm that you believe that Joseph Biden
25 is the legitimate President of the United States

1 **today?**

2 A No. I'm saying that I'm undecided in that
3 position because the investigations haven't been
4 done into our elections and audits haven't been
5 performed on the county level and Dominion won't let
6 us inspect the machines that they have given us to
7 use. And there's a lot of fraud that's been proven
8 in the election including our last election in Otero
9 County where there was a recount in one particular
10 race and there was three errors that came back.
11 Three.

12 So that means, that the vote wasn't a legit
13 legal vote because there was three questionable
14 ballots. You can look that up right here in Otero
15 County. So whenever you look at those mistakes that
16 were made in the last election, I believe there was
17 previous mistakes made in previous elections. So
18 that's why I can't answer that question until
19 there's thorough investigations made in our
20 electorate.

21 **Q This your opportunity to answer my**
22 **questions, so I'll ask you the question. Sitting**
23 **here today answering under oath, do you accept**
24 **Joseph Biden as legitimately elected President of**
25 **the United States?**

1 A Until there's very thorough audits done in
2 our electorate and in our elections, I have to say
3 that I can't say yes or no. I'm undecided.

4 **Q Otero County in 2020 voted overwhelmingly**
5 **for Donald Trump in the presidential election.**
6 **Isn't that correct?**

7 A Supposedly. I don't even know because,
8 again, I questioned our elector, and I questioned
9 the legality of the elector, so Donald Trump very
10 well could have stolen the vote here in Otero
11 County, because without a thorough investigation and
12 thorough audits done in our electorate, I can't say
13 that. I don't know. I don't know. I don't know if
14 he did or not. I'm undecided.

15 **Q So I have to tell you, Mr. Griffin, that**
16 **I've read now an enormous one, or at least to me an**
17 **enormous quantity of your postings and your tweets**
18 **and social media. A lot of them, and I'm going to**
19 **show you a bunch of them later on in this**
20 **deposition. And I don't recollect seeing one tweet**
21 **or one post where you accused Donald Trump of**
22 **stealing a single vote. Did you ever -- to your**
23 **knowledge, did you ever post a tweet or a social**
24 **media posting where you accused Donald Trump of**
25 **stealing a single vote?**

1 A I'm not sure if I did express that through
2 any tweets or not but just because I didn't express
3 it on social media doesn't mean that I may not have
4 questioned it.

5 **Q So, again, this is your opportunity,**
6 **Mr. Griffin, so I'll ask you, you're testifying**
7 **under oath.**

8 A Sure.

9 **Q Do you believe that Donald Trump stole any**
10 **votes in the 2020 election?**

11 A By what we found out through our audit and
12 our canvas here, it makes me question all of the
13 elections that have been taking place for a long
14 time now, because, again, I believe that our
15 electorate could have some major discrepancies in
16 it. So now, where we're at in history, or in the
17 currently in the present, looking back, who's to
18 say. I don't know.

19 Because, again, it goes back to being able
20 to trust our electorate and it's proven. There's
21 evidence that there are discrepancies in our
22 electorate. That was proven through the latest
23 recount where there were three votes that were
24 miscounted or mistallied, or if you want to get
25 right down to it, possibly on fraud -- that were in

1 our last recount. That's not the count -- that's
2 not to take into consideration the door-to-door
3 canvas where we have a lot more questions.

4 So, yeah, I don't know. I can't say, you
5 know, I mean, I wish I could. I wish I could say,
6 absolutely I know for a fact. But until there's
7 thorough audits and through investigations, I think
8 you would be a fool to sit back and say, oh yeah,
9 this person didn't steal any votes and that person
10 did steal votes. Because right now I don't know,
11 because I don't trust our electorate --

12 **Q I'm sorry -- go ahead.**

13 A And may I add, that falls directly under my
14 oath, because my oath to my office is to make sure
15 that our elections are secure and to make sure that
16 our electorate is secure. And the actions of Maggie
17 Toulouse Oliver and the State of New Mexico through
18 their Supreme Court ordered, which forced the Otero
19 County Board of Commissioners to certify the
20 election, or they were going to be charged with
21 felonies or removed from office just leaves me more
22 skeptical of the electorate and its processes.

23 **Q That election was actually not the 2020**
24 **election, that was the 2022 primary election where**
25 **the Supreme Court entered an order requiring you and**

1 **the other two Otero County Commissioners to certify**
2 **the county election results, correct?**

3 A That's correct. But I say that just so I
4 can voice my concern, because I don't know how long
5 this has been going on. I don't know how long these
6 irregularities have been taken place. So by what we
7 found out currently, it puts everything in
8 speculation. I mean, even Donald Trump's election
9 in 2016. Was that truly the will of the American
10 people, or was Hillary Clinton the will of the
11 people. Until we have a secure electorate that is
12 transparent where we can examine the Dominion
13 machines on the county level, where we can
14 hand-count the ballots in a world of computer
15 hackers, proven computer hackers, how can I, as a
16 city commissioner, say that I honored my oath when
17 deep down I question the legality of the election.
18 So I'm honoring my oath by taking the position that
19 I'm taking.

20 **Q How about your election in 2018?**

21 A Who --

22 **Q Let me ask the question. Why didn't you**
23 **just refuse to take the office because you don't**
24 **believe that these elections are fair and correct?**

25 A Because at that time, I was under the

1 assumption just like you probably are right now that
2 everything was up to snuff and on par. But, again,
3 as I mentioned a minute go through our recent
4 findings. Recent, like, current. That puts
5 everything in a place where, you know, I'm not just
6 going to accept. I'm not going to accept the
7 results that are given to me if I have questions.
8 That's my duty. That's my constitutional oath to
9 make sure that things are legal and in order. And
10 right now, I have great question.

11 Q Okay. Great. The Otero County Commission
12 that is the body that is ultimately responsible, is
13 it not, for the administration of county government
14 in Otero County?

15 A We're one of the bodies.

16 Q You're one of the bodies. I'm going to
17 show you what is a composite exhibit to the
18 deposition. By a composite exhibit, Mr. Griffin,
19 I'm referring to an exhibit that's made up of more
20 than one document. A bunch of similar documents.
21 This is a compilation of several resolutions and
22 several agendas of the Otero County Commission taken
23 from its official website.

24 I'm going to ask you. I'm going to put the
25 exhibit up and take whatever time you want to go

1 through the exhibit. I'm going to ask you some
2 general questions about this exhibit.

3 Would you put it up please, Chris.

4 I suggest here on this 30 pages to this
5 exhibit -- Chris, will turn the pages over, if you
6 enlarge it a little bit, Chris.

7 Turn the pages over so you can get a sense
8 of what's in there. And then if you want to see
9 anything specifically, stop them. Just go ahead and
10 scroll through it, Chris.

11 (Deposition Exhibit No. 7 marked.)

12 A Yeah. I remember that one.

13 MR. GOLDBERG: All right. Go ahead to the
14 next one, please, Chris.

15 Q (BY MR. GOLDBERG) So let me ask you some
16 general questions about these documents,
17 Mr. Griffin. You're aware, are you not, that Otero
18 County hosts an official website that the public can
19 access, correct?

20 A Correct.

21 Q And part of that website are pages devoted
22 to the county commission on which you serve?

23 A Sure.

24 Q One of the purposes of the website is to
25 make available to the public accurate copies of

1 official county documents, like, the resolutions and
2 agendas that make up this composite Exhibit 7.

3 Isn't that correct?

4 A Yeah.

5 Q Sure. So the people can go to the website
6 and see what the county commissioner is doing?

7 A Sure.

8 Q And the purpose is to make sure that those
9 documents that are from the website are true and
10 accurate documents?

11 A Yes.

12 Q You have no reason to doubt that, do you?

13 A No.

14 Q I'll tell you that the resolutions and
15 agendas in Exhibit 7 came from the county's website.
16 You recollect some or all of these agendas and
17 resolutions, correct?

18 (Deposition Exhibit 7 marked.)

19 A As -- yeah, I remember some of them, yeah.

20 Q Did you see any of them that did not appear
21 to you to be complete or accurate?

22 A I didn't see them when you were -- no, I
23 can hardly see anything on my phone. So, no, I
24 didn't see anything.

25 MR. GOLDBERG: Let's turn to page ten of

1 the exhibit, Chris. Can you enlarge that somewhat
2 so that Mr. Griffin can see them?

3 **Q (BY MR. GOLDBERG) These types of consent**
4 **agendas are common, are they not, for the county**
5 **commission?**

6 A When we vote on the consent agenda, it's
7 just usually just, kind of, housekeeping stuff that
8 we have on the consent agenda. We don't go over
9 each item individually nor discuss each item
10 individually. It's just -- we vote on an approval
11 and lump some of them. And a lot of them aren't
12 really -- they're not paid as close of attention to
13 as if it's on our new business agenda items. So,
14 you know, a lot of this stuff, it's on the consent
15 agenda. Again, we don't pay that close of attention
16 to.

17 **Q But they're on the consent agenda because,**
18 **in fact, it's required that you have -- you, the**
19 **county commission, and you, individually as a county**
20 **commissioner, must review them and approve them,**
21 **right, that's why they're on there?**

22 A As I mentioned, most of them are
23 housekeeping agenda items, like, minutes and stuff,
24 such like that or, you know, budget stuff where the
25 finance manager wants to, you know, move some stuff

1 around, or if she needs funding moved here and
2 there. And that's typically stuck on the consent
3 agenda. The consent agenda, again, they're items
4 that we don't pay as close of attention to.

5 Q Sure. And I'm not asking you nor am I
6 criticizing you for --

7 A I know, and I'm just telling you the way we
8 handle it.

9 Q I'm just trying to -- so let's just take
10 the first item on the consent agenda. CA for
11 Consent Agenda. One, approval of accounts payable
12 bills. It lists several of them and just says that
13 it's submitted by the finance directly, Ms. Hall?

14 A That's her.

15 Q That's the type of stuff that goes one way,
16 consent agenda.

17 A Typically.

18 Q That has to be on there because, in fact,
19 the county commission as the ultimate executive of
20 Otero County in this respect must approve it, right?

21 A Correct.

22 MR. GOLDBERG: Okay. Great. Thank you.
23 I'm done with Exhibit 7. Would you put up Exhibit 8
24 please, Chris.

25 MR. DODD: I'm sorry, Joe, you cut out for

1 a second. Was that Exhibit 8?

2 MR. GOLDBERG: Yes, please.

3 (Deposition Exhibit No. 8 marked.)

4 Q (BY MR. GOLDBERG) Again, Exhibit 8 is a
5 five-page resolution. It's Resolution No.
6 7-14-22/111-08. Authorizing hazard pay, starting
7 bonuses, referral bonuses for Otero County Detention
8 Center employees due to the unrepresented staffing
9 situation. Take whatever time you want.

10 Chris, if you'll scroll through this.
11 That's fine, Chris. Can you go back to page one, if
12 you will, Chris?

13 Q So this resolution deals with the
14 commission approving the spending of certain amount
15 of money that Otero County received. You understand
16 that, correct?

17 A Yeah.

18 Q The second whereas on page one of the
19 exhibit says, Whereas of that amount of 61.5
20 billion in direct federal aid was designated to
21 Americas counties and Otero County will receive just
22 over \$13.1 million. You remember that?

23 A Yeah.

24 Q The -- and this resolution is the
25 commission authorizing the use of that money for

1 particular purposes in this case, in the county
2 detention center as part of, again, its executive
3 functions as the ultimate authority for the
4 detention center, correct?

5 A Yes.

6 MR. GOLDBERG: So if you turn to page three
7 of the exhibit, Chris.

8 Q (BY MR. GOLDBERG) It says, now, therefore,
9 be it resolved that the Otero County Board of County
10 Commissioners. That's the board that you sat on,
11 right?

12 A That's correct.

13 Q As follows: One, effective August 1, 2022
14 all full-time OCDC employees, that's the detention
15 center, correct?

16 A Yeah.

17 Q Shall receive a hazardous pay in the amount
18 of \$1.20 an hour work, correct?

19 A Yeah.

20 Q And hazard pay, two, shall be available for
21 the time period commencing on August 1 an going
22 forward. In each of these numbered paragraphs of
23 the resolution, it's talking about how this money is
24 going to be expended, correct?

25 A Yeah.

1 Q And that (distortion) coming up to the
2 board of county commissioners.

3 A Do what?

4 THE REPORTER: Please repeat your question.

5 Q (BY MR. GOLDBERG) You recollect that issue
6 coming up to the Board of County Commissioners?

7 A I do.

8 Q And that, again, this is the board of
9 county commissioners carrying out its executive
10 functions as the ultimate authority of -- in this
11 case, the detention center?

12 A Yes. And I might add that this resolution
13 was composed by our county attorney who should be
14 fully well aware -- well aware of the law. And it
15 was also submitted by our finance director, Julian
16 Hall, who too should be fully aware of the law and
17 how the money is spent. So we go off of the advice
18 of our legal counsel and his expertise because we're
19 not attorneys. We're not, you know, so we have
20 confidence in them.

21 Q Thank you. I want to turn to social media.
22 You participate in social media, don't you,
23 Mr. Griffin?

24 A No.

25 Q You don't?

1 A No.

2 Q Do you --

3 A Not that I've been censored and
4 deplatformed. I don't have any social media right
5 now.

6 Q In the past, you have participated --

7 A Yeah, sure.

8 Q -- in social media. During the 2020
9 through 2022 timeframe, did you create any social
10 media accounts that you use?

11 A I don't recall.

12 Q Well, I'll remove --

13 A Did I create any? Is that what the
14 question is?

15 Q Yeah, have you ever created any social
16 media accounts?

17 A Yeah, sure. I've participated in social
18 media, absolutely.

19 Q As you sit here today, can you identify any
20 of the accounts that you created?

21 A Yeah, if I see them, yeah.

22 Q I'm going to give you another composite
23 exhibit with a lot of posts and tweets. But before
24 that, can you identify any right now?

25 A No.

1 **Q Are any of those accounts to your knowledge**
2 **still active?**

3 A No.

4 **Q Why not?**

5 A Because the big tech tries to silence the
6 voice of any opposition. That's the same thing that
7 happens in communist countries whenever the
8 citizenery speaks up in a way that the government
9 doesn't like or big tech doesn't like, they silence
10 your voice and they take away your right to speak,
11 which is what happened to me.

12 **Q So were all the accounts that you created**
13 **or used suspended by these big tech companies?**

14 A I don't know who suspended them, but
15 they're not up any more.

16 **Q All of them. Okay. As an Otero County**
17 **Commissioner, did you create or use any social media**
18 **accounts?**

19 A No. And I might add, my social media were
20 my own private social media platforms in which I
21 felt like I was protected under the First Amendment
22 as a free American to be able to speak freely on.

23 **Q Did you ever post -- to your knowledge,**
24 **post anything on social media as a post or a tweet**
25 **for an account that you did not create, or that you**

1 **were not the administrator of?**

2 A Not that I'm aware of. Huh-uh.

3 MR. GOLDBERG: All right. I've got another
4 composite exhibit. And this one is twice as large
5 as the last one. It's 69 pages. This is a whole
6 bunch, not all at once, but a whole bunch of the
7 posts and tweets on various social media accounts.
8 And I think one of the ways to do this is to put it
9 up there, and we can take a break.

10 But I'm going to ask Chris not to take a
11 break and unfortunately I'm going to ask you not to
12 take a break. But take about 10 or 15 minutes and
13 scroll through these, and then I'm going to ask you
14 some general questions about it. Is that all right
15 with you?

16 THE WITNESS: Are you talking to me?

17 MR. GOLDBERG: Yes.

18 THE WITNESS: Yeah, whatever you need me to
19 do.

20 MR. GOLDBERG: Okay. Great. Thank you.
21 So madam court reporter, we can take a break now and
22 come back. It is now 12:23. Let's come back around
23 12:40.

24 (Deposition in recess from 12:23 to 12:40.)

25 **Q (BY MR. GOLDBERG) Mr. Griffin, we're back**

1 on the record. You're still under oath. You've had
2 a chance to scroll through composite Exhibit 9,
3 which is a compilation of a number of social media
4 posts through the 2020 through 2022 timeframe that
5 appear to be yours. As you looked through them,
6 were all of these posts and tweets, posts or tweets
7 that you posted or tweet or retweeted?

8 (Deposition Exhibit No. 9 marked.)

9 A They were. I'd like to say on the record
10 and with emphasis that all these tweets and posts
11 and stuff were made out of my own personal, private
12 social media accounts. None of them were done as a
13 -- none of them were done as a county commissioner.
14 And I never, not one time spoke officially as a
15 county commissioner on any of the statements that
16 were made.

17 Q Okay. Great. I'm glad that you had the
18 opportunity to make that clear.

19 Chris, will you turn to page three of the
20 exhibit?

21 A I can't hear you, you're breaking up.

22 Q I'm sorry. Rarely do people say that they
23 can't hear me. I'll say it again. I asked Mr. Dodd
24 to turn to page 3.

25 Can you hear me now okay, Mr. Griffin?

1 A Yeah, I can hear you all right.

2 Q Okay. You see in the middle -- if you can
3 enlarge that somewhat, Chris.

4 You see in the middle it says Cowboys for
5 Trump@RideWithC4T. And then there's the date 28 of
6 December. Do you see that?

7 A Yeah, I do.

8 Q That, I'm going to call it -- that handle
9 the Cowboys for Trump@RideWithC42 [sic], that's a
10 tweet handle that you use, a personal one for you?

11 A No. The Cowboys for Trump account wasn't
12 -- I had another guy that managed the media and
13 handled that account. So a lot of the tweets and a
14 lot of the posts and stuff that you put up, I'm not
15 even sure it was me, because I wasn't the only
16 administrator on the private account, not a county
17 commission account, but a private account. And I
18 wasn't the only administrator on the account.

19 Q Who was the other administrator on the
20 Cowboys for Trump@RideWithC42 -- T?

21 A A man by the name of Mat Struck.

22 Q Matt Struck, okay. So either you or
23 Mr. Struck put up these Cowboys for Trump Ride With
24 C4T. Is that correct?

25 A Yes, yeah, that would be correct.

1 Q So if I saw a tweet for Cowboys for
2 Trump@RideWithC4T, I would be correct in the
3 conclusion that either you put that up, or
4 Mr. Struck put it up?

5 A Yeah, and you'd be right and would be able
6 to conclude as well that that's a private social
7 media account. It doesn't have anything to do with
8 my county commission seat, and it should be
9 protected under the First Amendment. You'd be right
10 to conclude that as well.

11 Q Okay. Great. And did you see any -- at
12 any time, did you see any tweets that Mr. Struck put
13 up that you didn't agree with?

14 A I couldn't care to answer that. I can't
15 necessarily say.

16 Q So as we're looking at this tweet here,
17 Cowboys for Trump@RideWithC4T on the 28th, it says
18 get read for new doors to open, new opportunities to
19 emerge, make every single day count, make your lives
20 matter. Do not take your loved ones for granted not
21 a single day ever. Do you see that?

22 A I see it.

23 Q Do you agree with that tweet?

24 A Sure.

25 MR. GOLDBERG: Would you turn to page one

1 please, Chris?

2 Q (BY MR. GOLDBERG) This is another tweet.
3 Cowboys for Trump Ride With C4T. Take a look. Is
4 this one that you put up, or is it one that
5 Mr. Struck put up?

6 A I can't recall.

7 Q It says -- is this one that you agree with,
8 or do you disagree with it?

9 A I can't read it. It's too small.

10 Q I'll read it for you. Violence needs to be
11 our very last option not when we still have a
12 democracy, not when we still have elections, and not
13 what we can still vote them out of office in
14 November.

15 A Sure.

16 Q Do you agree with that?

17 A Yeah.

18 MR. GOLDBERG: Would you turn, Chris, to
19 page nine of composite exhibit? I'm sorry. Page 15
20 of composite Exhibit 9.

21 Q (BY MR. GOLDBERG) Can you see this one?

22 A Yeah.

23 Q This one says, CouyGriffin@cowboycouy. Is
24 that your personal account?

25 A Is it Twitter? Oh, yeah.

1 Q **This is Twitter for iPhone. This is yours,**
2 **is it not?**

3 A Sure.

4 Q **No one else?**

5 A Yeah.

6 Q **No one else put those up?**

7 A Yeah, yup.

8 Q **So this is November 11, 2021. Can you read**
9 **it, or do you want me to read it?**

10 A No. I can read it.

11 Q **All right. Will you read it into record?**

12 A Sure. It says history will not reflect
13 back on Joe Biden as president. History will
14 reflect back on Joe Biden as a fraud. Much will be
15 learned as we move forward.

16 And, yeah, I agree with it, but the thing
17 is, we don't know what history. We don't know what
18 history will tell us, because history hasn't been
19 told yet. And that was a private tweet off of my
20 private platform. And it was emotionally driven at
21 a time when I don't know what I'd just seen. I
22 don't know what I had just heard.

23 But, you know, you can dig through the
24 dumpster, as dumpster divers do, and pick out little
25 sound bites here and there, and try to build a

1 narrative out of them. But the fact of the matter
2 is, is that everything you're looking at should be
3 protected under the First Amendment.

4 MR. GOLDBERG: Would you turn to page 35,
5 Chris?

6 Q (BY MR. GOLDBERG) You see this tweet?

7 A Uh-huh.

8 Q Is that one that you put up, or is this one
9 that Mr. Struck put up?

10 A I'm not sure.

11 Q Can you read it? Will you read it into the
12 record?

13 A Yeah, I can read it.

14 Q Will you read it? Go ahead and read it
15 into the record.

16 A Yeah, it says, you want a fight? Well, now
17 you got it. January the 20th.

18 Q Do you agree with that tweet?

19 A Sure. Every day is a fight, you know,
20 we're in a political fight all the time. I didn't
21 mean anything violent in nature in any way whenever
22 I wrote that, you know, I believe that we should
23 fight for political beliefs. We should fight for
24 our country. We should fight for our freedom. But
25 never any way, shape, or form would I ever want to

1 translate that over into any type of physical
2 violence or anything. And, again, it should be
3 protected under the First Amendment as a right to
4 express ourselves.

5 **Q Let's talk a little bit about Cowboys for**
6 **Trump. We're done with this exhibit, Chris.**

7 **Did you establish the organization called**
8 **Cowboys for Trump?**

9 A Yeah, I'm the one -- I'm under direction.

10 **Q Under whose direction?**

11 A Under direction of the Holy Spirit.

12 **Q Is C4T shorthand for Cowboys for Trump?**

13 A Correct.

14 **Q When did you establish Cowboys for Trump?**

15 A You know, it wasn't really necessarily
16 really established. It was more just very
17 organically grown. As I said, I have an idea that I
18 believe that was God-given. And so, you know, you
19 could say it was established, I guess the first
20 thing we did calling ourselves Cowboys for Trump was
21 a right in February 2019 into Washington D.C.

22 **Q I --**

23 A But Cowboys for Trump has never been
24 officially organized or officially established.

25 **Q Why did you establish Cowboys for Trump?**

1 A Because I support the president in his
2 America First agenda particularly boarded
3 security. And so whenever the president was making
4 a big effort to secure our southern border in turn
5 to secure the communities that we live in, I wanted
6 to be a very visible outward sign of support for the
7 president.

8 **Q Are you aware that Cowboys for Trump is**
9 **registered with the State of New Mexico as a**
10 **business LLC?**

11 A Yeah, well, whenever I organize that, the
12 only reason why I did is because I have little old
13 ladies that would write a check to help me out with
14 gas or fuel or expenses. And they would write the
15 check out and name it Cowboys for Trump. And I
16 never -- I couldn't cash those checks. I had no way
17 to cash the check. It had Cowboys for Trump on it,
18 and they kept bugging me to cash your check, cash
19 your check, cash your check.

20 So I just went down to the bank, and I
21 opened the most simple bank account that I could
22 possibly open as of means in a way to cash those
23 checks that were written out to Cowboys for Trump.

24 MR. GOLDBERG: Would you put up Exhibit 10
25 please, Chris.

1 Q (BY MR. GOLDBERG) Exhibit 10, Mr. Griffin,
2 is documents that's taken from the Secretary the
3 State's website. It's a registration for Cowboys
4 for Trump LLC. It names you as the manager of the
5 LLC, and it's identified as a for-profit business.
6 Did you cause this registration to be made? Did you
7 ask somebody to make this registration for you?

8 (Deposition Exhibit No. 10 marked.)

9 A No. I imagine I made it.

10 Q You made it. The address that is given
11 your name. Turn to the second page of the exhibit.
12 Under manager it says, Couy Griffin. And it has an
13 address 530-B Harkle Road Santa Fe, New Mexico. You
14 see that?

15 A Yeah, I can't see the documents on my side.

16 Q Okay. Again, you're doing this on an
17 iPhone?

18 A Yeah.

19 Q I got it. So it says 530-B Harkle Road
20 station [sic] 100 Santa Fe, New Mexico. Do you know
21 whose address that is?

22 A No, I don't. You know, I have my sister
23 because I'm not very good at organizing things, and
24 I'm not, you know, I had a lot going on at the time.
25 So I had my sister help with trying to get some of

1 the financial end of it organized. So that was
2 probably an address that she used.

3 Q Okay. And is your sister Kay Griffin?

4 A That's correct.

5 Q K-A-Y?

6 A That's correct.

7 Q So if you turn to page three of the exhibit
8 under organizers, the name Kay Griffin. That's your
9 sister?

10 A That's correct.

11 Q Okay. Great. Why did you organize this as
12 a for-profit organization, as opposed to a
13 not-for-profit organization?

14 A One, because it was the easiest way. I
15 felt like, to just have any, kind of, an
16 organization at all and again the only reason why I
17 even organized it financially, was so I could
18 deposit checks of very small amounts, into an
19 account where I could access the funds.

20 Q So there are people who made contributions
21 to Cowboys for Trump?

22 A Yeah, small.

23 Q Do you --

24 A And they're all recorded. That's why I set
25 an account up. That's why I tried to do things

1 where I could keep records of everything. And
2 everything should have records.

3 **Q So you have records of the amounts that**
4 **were contributed to Cowboy for Trump?**

5 A The bank -- the bank does, through deposits
6 and bank records.

7 **Q And you -- okay. And can you --**

8 A I ran everything through the bank.

9 **Q Can you give me an estimate of how much**
10 **money was raised by contributions to Cowboys for**
11 **Trump?**

12 A No, I don't have any idea. It wasn't much.
13 I mean it -- I shouldn't say it wasn't much, every
14 dollar is accounted for, and I'm grateful for, but
15 yeah. I wouldn't say it was much, much significant.

16 **Q More than a thousand dollars?**

17 A I don't know, I can't say. I can't say.

18 **Q You have no estimate whatsoever?**

19 A Can't say, huh-uh.

20 **Q You cannot. What was the money used for?**

21 A For travel expenses.

22 **Q For whom?**

23 A Totally -- total travel expenses, and I put
24 everything on a credit card and all those
25 transactions, I'm sure. You know, Hector Balderas

1 and the DHE already issued a warrant for all of my
2 bank records. And I'd like to say that he became
3 very quiet after he issued that warrant, and after
4 they looked at my bank records, because they didn't
5 find what I would imagine they were hoping to find,
6 and that's a lot of money in big transactions
7 because I don't do things -- you know, my
8 accomplishments don't hang on the ends of finances.
9 My success is hanging on the ends of God, and God's
10 grace and Him providing these platforms to be able
11 to do these things so. . .

12 **Q So when you would travel, as an example to**
13 **Washington D.C., would your expenses for traveling**
14 **to Washington D.C. be paid for, sometimes by Cowboys**
15 **for Trump?**

16 A It would -- typically -- I mean, because I
17 don't have any money. I make \$22,000 a year so
18 whenever I have to load my horse up behind my truck
19 and trailer and make trips across the United States
20 to go advocate for the America First agenda, that
21 was typically all done through support that people
22 would give me through small donations. I never, you
23 know.

24 **Q So when you travelled to Washington D.C.**
25 **for the events of January 6, 2021, you went in a**

1 **vehicle, an SUV that had Cowboy -- C4T?**

2 A That's correct.

3 **Q Identified --**

4 A It was a Cadillac, it was a Cadillac
5 Escalade.

6 **Q Right, it had a C4T. Did Cowboys for Trump**
7 **pay for those expenses to go to Washington D.C.?**

8 A Yes. Yeah, well, it was money that was
9 raised and given to go out and speak for the America
10 First agenda and to support our president.

11 **Q And did Cowboys for Trump raise any money**
12 **other than through donations by individuals?**

13 A No. That was it.

14 **Q At the beginning there was a group -- some**
15 **friends that tried printing T-shirts and tried -- we**
16 **tried to get a merchandise stuff going, but that**
17 **never really amounted to anything. It was mostly**
18 **all through personal donations that people gave?**

19 **Q Other than you and your sister, was anybody**
20 **else involved in organizing Cowboys for Trump?**

21 A No.

22 **Q Does Cowboy for Trump have any members as**
23 **such?**

24 A No. Not per se. There's, you know, I have
25 a few friends that will usually always come out and

1 help me, but, no, we don't have any official
2 organization or official membership.

3 **Q Is Cowboys for Trump still active as an**
4 **organization?**

5 A No, I don't even -- I let the LLC lapse.
6 No.

7 **Q Have you ever drawn a salary from Cowboys**
8 **for Trump?**

9 A No, never. I never did it for the money.
10 I did it to help our country and protect freedom.

11 **Q Did Cowboys for Trump have any social media**
12 **accounts, other than the one that we've discussed in**
13 **your previous testimony that you and Mr. Struck were**
14 **authorized to use?**

15 A No.

16 **Q And other than you, did anybody else have**
17 **their expenses paid for by Cowboys for Trump?**

18 A Yeah. I tried to take care of as many as
19 expenses as I could, of other people that would,
20 that came along. The first ride that we made to
21 Washington D.C., I paid for the expenses to fly
22 tickets and rooms and food for about seven or eight
23 men that went with me from New Mexico and whenever
24 we would go to different events, I would try to help
25 as many as I could with fuel expenses, with food

1 expenses. I always kept the money in Cowboys for
2 Trump next to nothing. I tried to spend everything
3 that came in, because that's why it was being given.

4 **Q Are you an authorized user of the Twitter**
5 **account with the name that is the handle @Ride with**
6 **C4T?**

7 A No.

8 **Q Who's the authorized user?**

9 A That's Matt Struck.

10 **Q Are you the authorized user for the Twitter**
11 **account handle Cowboys for Trump?**

12 A Yeah, on Facebook or Twitter?

13 **Q Twitter.**

14 A I'm not sure, I might be on the -- I might
15 be one of the -- I might have access to it. I don't
16 know, I'm not sure.

17 **Q Are you an authorized user of the Twitter**
18 **account with the handle CowboyCouy?**

19 A That's only me, and that's my personal
20 Twitter account. And I believe that we're still
21 protected under the First Amendment, and I believe
22 that all those posts that I made, should be
23 protected by the First Amendment. Even though, you
24 know, many might dig through the archives looking
25 for little statements here and there like you guys

1 had done trying to pick little statements here and
2 there and sensationalize them, and make me look like
3 I'm violent, or make me look like I'm unhinged.

4 But you know, I mean, it's pretty bold to
5 say it in a place of judgment like that whenever at
6 -- what about your own personal Twitter page, or,
7 you know, these other people's personal Twitter
8 pages, you know. Do you make some statements
9 sometimes that are driven off of emotion or some set
10 of circumstances? And then you know, to have all
11 those rubbed back in your face, I don't know I feel
12 like it's pretty vindictive and slanderous.

13 **Q Going back to the Twitter accounts, are you**
14 **an authorized user of the Twitter account with a**
15 **handle CouyGriffinC4T?**

16 A I don't know. I don't even know -- I'm not
17 even familiar with it. We -- you know, I've been
18 shut down on Twitter and Facebook and deplatformed,
19 and I've made attempts to be able to speak again,
20 just like we should have a right to in America
21 without being censored the way we're being censored,
22 so I'm not sure. I don't remember making it, but I
23 possibly could have, I don't know.

24 **Q So Mr. Struck and you could post on Ride**
25 **with C4T or Cowboys for Trump, but only you were**

1 **authorized to be posting Twitters on CowboyCouy?**

2 A Yeah. @CowboyCouy that's -- those are all
3 statements, again, that I made, off of my own
4 personal Twitter page. Protected under my First
5 Amendment right. They had nothing to do -- they had
6 nothing -- I might add, they had nothing to do with
7 my county commission seat. I never posted on there
8 as a county commissioner. I never used it in a way
9 to be an official statement for my county commission
10 state seat.

11 So I don't feel like, you know, I mean, as
12 far as trying to find a hole in there where it's
13 unconstitutional or a violation of my oath, you
14 know, again, I was operating on my own personal
15 Twitter page. It was personal statements that I
16 take responsibility for personally, and they all
17 should be protected under the First Amendment.

18 **Q Did Matt Struck help you organize and**
19 **establish Cowboys for Trump?**

20 A No. I wouldn't -- no.

21 **Q How did you come to know Mr. Struck?**

22 A I met Matt in Washington D.C. in maybe 2019
23 on the -- it was the 4th of July, it was the 4th of
24 July -- yeah, it was in 2019 in Washington D.C.

25 **Q What were you doing in Washington D.C.**

1 **when you met Mr. Struck?**

2 A I went to ride -- I had a 22 -- 22 people
3 horseback in the 4th of July parade in -- down
4 Constitution Avenue. So, you know, you talk about
5 the money end of it. Do you know how expensive it
6 is to have 22 horses on the streets of Washington
7 D.C. and paying for everybody's travel and meals and
8 lodging and, you know, I mean, but that's all
9 recorded in bank statements. And I'm sure Hector
10 Balderas has already dug through it all so.

11 **Q And all those experiences were paid for by**
12 **Cowboys for Trump?**

13 A They were paid for by supporters of Cowboys
14 for Trump. They were paid for through small
15 donations that people gave to support those who
16 came.

17 **Q But those donations you made went into the**
18 **Cowboys for Trump bank account --**

19 A They were all -- they were all given to
20 support those that showed up to come and ride
21 throughout -- since I organized Cowboys for Trump,
22 all of the donations that had been given, have gone
23 back out to pay for people's travel expenses,
24 because that's why they were given.

25 I don't have a big boat at the house. I

1 don't have a big fancy motor home. I don't have
2 property that I'm buying. You can look all you
3 want, and all you're going to find at my house is a
4 bunch of old broke-down, junked-out vehicles and an
5 old double-wide that I live in. I live very
6 sacrificially.

7 **Q But I want to make sure I understand. So**
8 **correct me if my understanding is wrong. What I**
9 **have heard from you in your testimony today is that**
10 **people gave donations to Cowboys for Trump to**
11 **support its activities. You took all of those**
12 **donations and put them in a bank account for Cowboy**
13 **for Trump, and then you would use that money to**
14 **support Cowboys for Trump activities, including the**
15 **activities of people like going on this 4th of July**
16 **horseback ride out of the Cowboys for Trump account.**
17 **Is that correct?**

18 **A** Sure. It would be safe to say that Cowboys
19 for Trump, the bank accounts, were mere portals for
20 that money to come into and go back out of, to pay
21 for the expenses of those who supported the America
22 First agenda, which in turn supported Cowboys for
23 Trump.

24 **Q Remind me, how many horses were there on**
25 **that July 14 -- 4th of July parade?**

1 A I believe we had 22 people horseback.

2 **Q 22 people. And that was a Cowboys for**
3 **Trump event, right?**

4 A Yeah, I guess you could call it that. I
5 mean, it was a -- just a group of people that
6 gathered together and, yeah, rode horses in the
7 parade. Nothing was official, or nothing was you
8 know yeah.

9 **Q Did all of the money to pay for that come**
10 **out of the Cowboy for Trump account?**

11 A Sure. Well, yeah, as I said Cowboys for
12 Trump, those bank accounts were a mere portal for
13 the -- because how else do you handle money? You
14 know, I mean how else do you handle a check when
15 somebody writes a check to support the travel
16 expense and the expenses of those that are coming
17 to ride. You have to have a portal to handle the
18 money, so yeah.

19 **Q So you met Mr. Struck at that trip to**
20 **Washington that we've just been talking about, that**
21 **involved the July 4th parade, correct?**

22 A That's correct.

23 **Q And Mr. Struck went with you to Washington**
24 **D.C. in January of 2021, correct?**

25 A That's correct.

1 **Q Did he do any work for Cowboys for Trump**
2 **between 2019 and 2021?**

3 A Matt Struck never worked for Cowboys for
4 Trump. Matt Struck supported Cowboys for Trump.
5 But Matt Struck was never under any contract. He
6 was never under any verbal agreement. He was never
7 financially compensated any ways for any of the work
8 that he did. But whenever we would travel, I would
9 furnish a hotel room, you know, through the
10 donations that we received through Cowboys for
11 Trump. I would try to get our meals when I could, if
12 there was money in there to pay for meals. But Matt
13 never, he never worked for Cowboys for Trump. He
14 was -- Matt was just sacrificially given to this
15 movement as I have been.

16 **Q So when he travelled with you to Washington**
17 **D.C. and took all those videos. He was not paid for**
18 **that?**

19 A No.

20 **Q And you knew he was -- did you invite him**
21 **to go with you to Washington D.C. in that**
22 **January 2021?**

23 A I'm not sure how that all came together. I
24 think Matt was the first contact. I think he was
25 the one that was first in touch with Amy Kremer and

1 the Women for America First platform. I think Matt
2 told me about it, so, no, I didn't invite him to go.

3 Q Okay but at some point, the two of you
4 determined that you would travel together to
5 Washington D.C. in January 2021?

6 A Sure.

7 Q And I take it, is it correct, that before
8 you went, you made a determination that he was going
9 to video tape, make video tapes of you and the
10 travels to Washington D.C. and the events in
11 Washington D.C. on January 6th, and videos of your
12 return after the events of January 6th?

13 A No. I would say that we never made a
14 determination. We never, like, said this is what
15 we're going to do. We just, Matt is a man of faith
16 as well. And Matt goes where the Lord leads and
17 where God calls. And Matt felt like the Lord was
18 calling him. And Matt is very gifted with his phone
19 and capturing events and capturing images. And he
20 worked one hundred percent solely by himself on all
21 of that. He never worked under my direction, and
22 there never was an agreement.

23 Q So all those videos are made from
24 Mr. Struck's smart phone?

25 A I don't know what devices he used. I don't

1 know. Possibly. I don't know.

2 Q Did you see him use anything other than his
3 smart phone?

4 A I don't remember him using anything other
5 than his phone.

6 Q Did you have an understanding as to why
7 those videos were being made?

8 A I'm sorry. What was it?

9 Q Did you have an understanding of why those
10 videos were being made?

11 A No. No. Other than just to capture the
12 events and what was going on and to share with
13 others, you know, the events and yeah. The journey.

14 Q So when you said in your last answer that
15 your understanding was you wanted to capture those
16 events and share them with others, did you in part
17 would that be through Twitters and postings on other
18 social media accounts?

19 A Yeah, I don't know. I don't know where he
20 was sharing them, or how he was sharing them, I
21 don't know. That's -- he was operating inside of
22 his own capacity outside of any direction of mine
23 so. . .

24 Q Well, you shared some of those videos,
25 didn't you, on your social media account?

1 A Possibly. I share a lot of stuff on my
2 social -- on my private social media account. I
3 share a lot of stuff on my private social media
4 account.

5 **Q When you were looking into that cell phone**
6 **camera and speaking directly into the video?**

7 A Uh-huh.

8 **Q You were doing that for the purpose of**
9 **sharing information to other people, weren't you?**

10 A No. I was doing it more just as an
11 expression of my own feelings and my own opinion. I
12 wasn't sharing the information, I was just, it was a
13 freedom of expression and that's all I was doing
14 whenever we made those videos is just expressing
15 myself. And, might I remind you, underneath full
16 constitutional right to do so.

17 **Q You looked at a number of those videos,**
18 **didn't you?**

19 A Which videos?

20 **Q The ones that Mr. Struck took?**

21 A Yeah, I've seen videos that he's taken.

22 **Q Of the trip to Washington D.C. in**
23 **January 2021?**

24 A I don't -- I'm not -- I've seen some of
25 them I guess, but I don't recall which ones and

1 when. I don't really tend to really look at a lot
2 of the videos that I make. It's, kind of, hard for
3 me to watch myself, I would say. You know, I don't
4 sit around looking at videos that I've made, you
5 know, I'm not -- I'm a progressive. I move forward.
6 I don't sit in the back and reflect on things that
7 I've done, you know, so yeah.

8 **Q When was the last time you spoke to**
9 **Mr. Struck?**

10 A I'm not sure.

11 **Q When was the last time you remember**
12 **speaking to him?**

13 A Huh?

14 **Q When was the last time you remember**
15 **speaking to him?**

16 A Probably maybe a couple weeks ago.

17 **Q What did you talk about?**

18 A To be honest with you, I don't even really
19 remember. I just know that we visited on the phone
20 probably about politics. That's usually what, kind
21 of, our conversation revolves around.

22 **Q Did you call him, or did he call you?**

23 A I'm not sure. I might have called him.
24 Sometimes if I see someone -- sometimes if I'm
25 watching the news or something, and I see something

1 that's of interest, and I want to visit with a
2 friend -- Matt's a friend. Matt's a close friend of
3 mine. He's somebody that I have a lot in common
4 with; somebody that I like to speak to.

5 **Q Do you have a recollection -- as you sit**
6 **here today, do you have a recollection as to why you**
7 **picked up the phone and called Mr. Struck a couple**
8 **weeks ago?**

9 A No, I don't.

10 **Q Did you talk to --**

11 A I don't know. I think I was sitting on my
12 porch, and I think I was just thinking about
13 politics, you know, and politically what's going on.

14 **Q Did you talk about --**

15 A But he's a friend, he's just, like, I hope
16 you have friends, and I hope you occasionally pick
17 up the phone and call a friend and talk to him about
18 things going on in your life, you know. I think I
19 called him and talked to him about my little boy, as
20 a matter of fact, and we had just been out riding,
21 and my son started to get a good feel for his horse,
22 and he's riding really good. And I think I wanted
23 to call and brag about my son a little bit. I think
24 that's why I called him.

25 **Q When you called him last time, did you talk**

1 **to about this lawsuit?**

2 A Huh-uh. I talked about -- I did tell him
3 that I had a deposition coming up and told him that
4 I didn't have an attorney, and I didn't have any
5 counsel or anything. But I was just going to tell
6 you the truth and be honest with you and continue to
7 stand on good ground, because I stand on good
8 ground. I'm not a criminal. I'm not hiding money.
9 I'm not swindling money. I'm not manipulating
10 things.

11 You know, I try to do everything right. I
12 try to do everything under conviction that I get
13 from God. And so, yeah, I might have told him. I
14 might have told him that I had gotten another
15 lawsuit, you know, I mean, yeah, but --

16 **Q But you do remember saying that you were**
17 **going to be deposed in this lawsuit?**

18 A That what?

19 **Q You testified you -- what your previous**
20 **answer. You said you talked to him about being**
21 **deposed in this lawsuit that you were going to be**
22 **deposed in this lawsuit?**

23 A Yeah, and that might have carried over.
24 That might have been what the conversation carried
25 into. I remember telling him that I was going to --

1 I told him I was going to go -- I was going to talk
2 to you guys. But, you know, I mean, just in casual
3 conversation. And, you know, and I could lie to
4 you. I could say, oh, no. I didn't say anything
5 about it. I didn't do this.

6 But I'm being totally honest with you, you
7 know, yeah, I told him that I was going to be doing
8 this and that I was concerned because I don't have
9 an attorney. I don't have any legal counsel. I
10 can't afford any legal counsel, but I'm going to try
11 to comply is the best as I possibly can, which is
12 what I'm trying to do with you all today.

13 **Q What did he say to you when you told him**
14 **about this lawsuit and that you were going to be**
15 **deposed?**

16 A I don't know. I don't remember exactly.
17 I'm under oath right now, and I don't want to make a
18 mistake. I don't remember.

19 **Q You don't have a lawyer unfortunately. But**
20 **I will tell you what the rules are. You don't have**
21 **to -- you can't -- you cannot refuse to testify**
22 **because you don't remember specific words or**
23 **specific details --**

24 A I do remember --

25 **Q Let me finish.**

1 A Okay. I'm sorry.

2 Q Tell me what you do remember, and you can
3 tell me generally --

4 A Okay.

5 Q Let me finish. And you can tell me
6 generally. You can tell me generally what you
7 recall and make it clear that you don't recall
8 specific words or whatever. But you can't use the
9 lack of specificity as a reason to say that you're
10 not going to testify. So you testified that you
11 talked to Mr. Struck in the last couple of weeks,
12 and you talked about this lawsuit and that you were
13 going to be deposed.

14 I asked you, what did he say in return?
15 With those instructions on my part, tell me what you
16 recollect that he said to you.

17 A I recollect telling him that I'm just going
18 to be honest, and I'm going to answer your
19 questions, and I'm going to do, you know, be an open
20 book. I said, I'm going to be honest because I
21 stand on good ground. I know the ground that I
22 stand on. I know the actions that I take. And I'm
23 going to be truthful and upfront and honest. I
24 remember telling him that.

25 Q That's not what I asked you. I asked you

1 **what did he say to you? Did you recollect what he**
2 **said to you?**

3 A I don't even remember. I don't even -- you
4 know, but I do remember telling him too that -- I
5 remember telling him that we're probably going to be
6 asked about this, having this conversation and that
7 we probably shouldn't even be talking anything about
8 it. I think I remember telling him that too, or
9 something to that effect.

10 Q **Anything else that you recollect -- you can**
11 **recollect what you said to him? But I'm asking you**
12 **right now, what you recollect he said to you?**

13 A I don't remember. I don't remember. I
14 don't remember what his thoughts was.

15 Q **I rarely do this in depositions, but I'm**
16 **going to do it now.**

17 A Okay.

18 Q **You told me in great detail what you said**
19 **to him, but you're telling me under oath as you sit**
20 **here today that it's the honest truth that you don't**
21 **have any recollection whatsoever from what he said**
22 **to you in return?**

23 A I don't. I think he just agreed with me.
24 I think he just responded and said, yeah, that's the
25 way it should be.

1 **Q And he agreed with you that you probably**
2 **shouldn't be talking about this?**

3 A No. I think more I related it that he
4 agreed with me just to tell you the honest truth and
5 try to be upfront and honest. I think he said
6 something, like, yeah, that's -- I agree, or that's
7 right, or he said something to that effect.

8 **Q Did Mr. Struck tell you that he had been**
9 **subpoenaed to produce his videos to us in this case?**

10 A He did. He did. But I don't know if that
11 was in our last conversation that we had, because
12 I've spoken to him a few times, and he had -- I had
13 told him about the enormous amount of discovery that
14 you guys are requesting because I don't have all of
15 the Facebook posts and stuff that you guys are
16 wanting. I don't have all of the Twitter posts. I
17 don't have access to it all.

18 I've been trying my hardest to try to get
19 all of you guys the discovery that you've been
20 asking for, and it's about to drive me insane. And
21 so, I think that I said something in my
22 conversations that it's extremely overwhelming, and
23 it's beginning to take -- bring me to the point
24 where I don't even know what to do. And he said
25 that he had -- he felt like he had about

1 14,000 hours or something of video footage that
2 we've accumulated over the years. And it was an
3 extreme burden, this discovery, what you guys are
4 doing to us through the discovery process because
5 it's not like you're being specific and saying,
6 okay. We want this from this date or this from this
7 date.

8 You want everything that we've done, and
9 we've been working our butts off for two years,
10 three years. And we have lots of social media. We
11 have lots of videos and stuff. And it's such an
12 overwhelming request.

13 **Q What else did he tell you --**

14 A I don't --

15 **Q No. Let me ask the questions, and then**
16 **you'll give the answer. What else did he tell you**
17 **at any time about his being subpoenaed by us to**
18 **produce videos and other information in this case?**

19 A I don't know, because we really didn't talk
20 about it. Like I said, it was a subject that I
21 didn't want to talk about because I knew that you
22 were going to be -- that you guys were going to be
23 digging in so deep on all of this stuff. And so it
24 was a subject that I didn't want to talk about
25 because I didn't want to go through what you're

1 trying to put me through right now.

2 **Q What is it that you think we're trying to**
3 **put you through right now?**

4 A This type of questioning where I'm trying
5 to remember, and I'm trying to -- it's difficult
6 because I want to tell you the truth, and I want to
7 tell you the truth in its entirety. But it's hard
8 to remember casual conversations that you have, have
9 had three weeks, a month ago. You know, I didn't
10 even want to talk about any of this lawsuit, any of
11 this stuff with him because he is under a subpoena
12 to do the same thing and, yeah.

13 **Q Did Mr. Struck tell you anything about what**
14 **he was doing to respond to the subpoena?**

15 A Yeah, he said he was going to -- going to
16 speak to an attorney. And I'll tell you something.
17 Matt and I, we usually talk, not every day, but
18 we'll talk every couple of days or so, but we
19 haven't even spoken to each other on the phone.

20 And like I said, probably, maybe a couple
21 of weeks, you know. And it's hard because Matt's a
22 friend of mine. That's somebody that I like to talk
23 to, and it's just -- it's one more thing that's
24 difficult about this because I lose a friend too
25 that I can't even communicate with. And I don't

1 have a whole lot of them. Matt's one of them that
2 is a good friend, and I'm having that taken away
3 from me too.

4 **Q Did you stop talking to him because of this**
5 **lawsuit?**

6 A No. It wasn't because of this lawsuit.
7 Like I said, I think I called him up. I don't know.
8 I think we had just got done riding or something,
9 you know. It wasn't like I called him up to talk
10 about -- like I said, I didn't want to talk about
11 the lawsuit with him because I just don't. I don't
12 want to complicate things. Because I stand on good
13 ground. I stand on firm ground.

14 And I don't want to -- why would I want to
15 talk about anything whenever I know the ground I
16 stand on. If I was a criminal, and I was trying to
17 cover my tracks up, then, yeah, I would have
18 probably been reaching out to him and saying, hey
19 don't say this and do say that. Maybe you should
20 say this. That didn't transpire between us. Why?
21 Because we stand on good ground.

22 **Q When Mr. Struck told you that he was going**
23 **to get a lawyer or talk to a lawyer about this, how**
24 **long ago was that?**

25 A I don't even know. I don't recall.

1 Q Was it a call that you had with him --

2 A Can I take the -- I'll just take the Fifth
3 on it. How about that?

4 Q No. I don't -- you can take -- I can't
5 tell you -- I'm not your lawyer. I'm the lawyer for
6 the other side.

7 A That's fine. The only reason why I do is
8 because I feel like I've already tried to be as
9 honest and open with you as I can. And I feel like
10 you're continuing to badger me. I've already told
11 you that I didn't, you know, if I'd mentioned
12 anything about this lawsuit, it was what I've
13 already told you, so I'll just take the Fifth on the
14 rest of it.

15 Q All right. Then I have to ask you, then, a
16 series of questions.

17 A Okay.

18 Q How many conversations about this
19 lawsuit --

20 A How many what?

21 Q Listen to me. Listen to me. I'll try to
22 speak up.

23 A I'm trying to.

24 Q Okay. Listen. Without telling me anything
25 about what went on in the conversations, just tell

1 me how many conversations you had with Mr. Struck
2 about this lawsuit --

3 A Again, I plead the Fifth.

4 Q Let me finish. Let me finish.

5 A You can finish, but I'm still going to
6 plead the Fifth if you're trying to go back to where
7 I just told you I'm done.

8 Q We're going to do our jobs here. I'll ask
9 the questions, you'll give me the answers whatever
10 the answers are that you're going to give me.

11 A Okay.

12 Q Without telling me anything about the
13 substance of the lawsuit of the conversations other
14 than to answer my question, how many conversations
15 did you have with Mr. Struck about this lawsuit?

16 A Fifth.

17 Q Was anybody else on the calls with you on
18 these conversations that you take --

19 A Fifth.

20 THE REPORTER: I did not get the end of
21 that question.

22 Q (BY MR. GOLDBERG) I'll ask the question,
23 again. Was anybody else on the calls with
24 Mr. Struck that you're take the Fifth Amendment on?

25 A No.

1 Q Can you give me the dates?

2 A The what?

3 Q The dates of these conversations or a
4 date --

5 A No, I don't know when they were.

6 Q Okay. Great. Thank you. I'll get off of
7 Mr. Struck now. Let's see if we can get back to
8 questions and answers?

9 A Yeah, and I tried to be as, you know, I
10 don't appreciate this. I could have just completely
11 denied this whole thing today and just denied doing
12 a deposition, and then I would have made you compel
13 and compel the courts and forced me to do it, but I
14 would rather just be open before you and just to try
15 to answer everything as honestly as I can, but I
16 don't appreciate being badgered either, okay.

17 Q I don't accept your characterization that
18 I'm badgering you, but I will state for the record
19 that you're telling me that you want to be really
20 open with me after taking the Fifth Amendment
21 exclusively for the purpose of saying that you
22 didn't want to answer anymore?

23 A You can state it for the record all you
24 want.

25 MR. GOLDBERG: Let's go on, Mr. Griffin,

1 let's go it. Maybe this is a good time to take a
2 ten-minute break.

3 (Deposition recessed from 1:36 to 1:48.)

4 Q (BY MR. GOLDBERG) Before we took the
5 break, we were talking about your conversations with
6 Mr. Struck, and you also talked about how you felt
7 that the discovery requests in this lawsuit were
8 oppressive to you.

9 I want to ask you some questions about
10 that. It's correct, is it not, Mr. Struck [sic],
11 that you and Mr. Dodd --

12 A What's that?

13 Q It is correct, is it not, Mr. Griffin, that
14 you and Mr. Dodd have had a number of e-mail
15 communications where Mr. Dodd has asked you about
16 when are we going to get the discovery responses
17 from you?

18 A Yeah, that's correct. And as I've
19 responded to Mr. Dodd that, you know, I have a lot
20 going on with my commission, with my family, and
21 with just trying to survive. So as I've mentioned
22 before, these discovery requests are massive, and
23 it's extremely overwhelming to try to go through all
24 of the e-mails and try to look for any statements
25 that pertain to January 6 or to stop the steal, and

1 it's a lot of work. And as you can see I'm a
2 one-man-show, and I don't have any help to help me
3 with this, sort of, stuff, so I've asked Mr. Dodd
4 for an extension on the days, which he beyond
5 graciously has allowed me to have.

6 And, you know, and I've expressed Mr. Dodd
7 the heavy burden that this is to me and the mental
8 anguish that I have been put through by trying to
9 decipher what you guys want and what's not relevant.
10 And as I mentioned, it's a massive discovery
11 request. Massive.

12 **Q Well, to my knowledge, so far you haven't**
13 **produced a single document, a single tweet, a single**
14 **video, a single item, answered a single question.**
15 **Is that correct so far you haven't produced a single**
16 **thing yet, correct?**

17 A Would it be correct, though, to, yes, I'll
18 answer your question. Yes, I haven't produced it.

19 **Q That was my only question.**

20 A Would it be correct to say that a lot of
21 the tweets and a lot of the stuff that you have
22 already put up on record is the same stuff that
23 you're requesting for me to send you? Would that be
24 correct?

25 **Q I'll give you another instruction. Again,**

1 you're under oath here, and you haven't been in a
2 deposition. And I'll give you another instruction
3 about depositions. Fortunately, I get to ask the
4 questions. You don't get to ask the question. I
5 get to ask you --

6 A But a lot of --

7 Q Let me finish. We're going to do this.
8 We're going to do this the way depositions must be
9 taken. We're doing this as a courtesy to the court
10 reporter, who has to take this down. All right.

11 So Mr. Dodd has told you more than once
12 that you can't -- you shouldn't be -- and recently
13 told you that you should be providing us with
14 information that you do have now. Why haven't you
15 provided us with any information that you do have
16 now?

17 A And I would like to add that a lot of the
18 information that you're requesting, you already
19 have. You already posted it up. You've already --
20 you've already been through my dumpster. You
21 already dug through all the dumpster and tried to
22 grab all the stuff that you need to try to build
23 this narrative that you're trying to build.

24 I'm still working on it. I'm still trying
25 to compose and trying to accumulate the requests

1 that you've made, but you've already got all of the
2 stuff. You've already got all the tweets. It's
3 already on record.

4 Q Did Mr. Dodd -- did Mr. Dodd tell you that
5 you should be providing the information that you
6 presently have and not wait until you got all of it?
7 Did he not tell you that? Yes or no?

8 A No. I'm still working on it.

9 Q No. That's not an answer to my question.

10 A Okay.

11 Q Did Mr. Dodd tell you to upload --

12 A To start uploading, okay, I'll try to get
13 on that this afternoon.

14 Q Did you talk to Mr. Struck in your
15 conversations with him about what you were doing to
16 respond to the discovery request?

17 A No. I'll plead the Fifth on it.

18 Q Did you talk -- did Mr. Struck tell you
19 what he was doing to respond to the discovery
20 request?

21 A Fifth. (Indicating.)

22 Q Did you tell Mr. Struck that you were not
23 going to produce anything at all?

24 A Fifth. (Indicating.)

25 Q Did he tell you that he wasn't going to

1 produce anything at all?

2 A Fifth. (Indicating.)

3 Q You have to speak. She can only take down
4 what you say. So if you're going to invoke your
5 Fifth Amendment privilege, you have to do it,
6 Mr. Griffin.

7 Did you and Mr. Struck agree that you would
8 slow-walk the responses to discovery in this case?

9 A I've already told you in as much depth as I
10 can possibly tell you the conversations that Matt
11 and I had. So this digging in the way you're
12 digging in, I already told you I don't recall.
13 Fifth (Indicating.)

14 Q Are you aware of an organization called the
15 Proud Boys?

16 A I am aware of them.

17 Q What do you understand that organization to
18 be?

19 A You know, my perception of them is they're,
20 kind of, militant. I don't agree with a lot of the
21 rhetoric and the approach that they have. I've
22 witnessed them myself marching militantly, chanting
23 F Antiva, F Antiva, which just because I don't agree
24 with it, though, I don't sit in a place of judgment
25 because I appreciate men that will go out and defend

1 those that are defenseless.

2 And I know that on many occasions, the
3 Proud Boys have gone out in the street at night in
4 fairly dangerous places and protected citizens from
5 being attacked by Antifa. This is documented.
6 They've gone out and defended people because people
7 in our world will get physically attacked just for
8 wearing a Make-America-Great-Again cap down the
9 street.

10 And many instances, the Proud Boys go out
11 and they defend these people from being physically
12 assaulted by Antifa. So for that I appreciate. But
13 I don't have any contact with the Proud Boys. I
14 can't say that I could even really even name any
15 other than the ones that you see in the headlines,
16 like, Enrique Tarrío or Antario, whatever his name
17 is.

18 To him and some of the others, you know,
19 I'm a little bit knowledgeable of them. I've met
20 some of the Proud Boys at different rallies that
21 I've attended. And on every instance, I felt like,
22 you know, they're patriots. They're concerned as I
23 am about what's going on in our country.

24 **Q In your last answer when you described them**
25 **as being militant, I want to make sure the record is**

1 **clear. Is that something that you don't approve of?**

2 A No. No, I don't approve of anything that,
3 you know, is militant like that, you know, I mean,
4 but at the same time, I'm going to stop short of a
5 place of judgment, because each man, each
6 organization there, they should be responsible for
7 their own actions and the way they do business, so
8 who am I to judge.

9 Q Okay. I have to admit, I find your -- I
10 find your answers slightly confusing, because you
11 started out by saying you agreed with my
12 characterization, that you disapproved of them. And
13 you ended your answer by saying, who am I to judge.
14 But I'll let it stand there.

15 A No. Let me clear it up then. If you don't
16 understand it, let me clear it up.

17 Q Clear it up.

18 A I would just say because they do things a
19 certain way that I necessarily wouldn't do them, or
20 that I necessarily wouldn't approve of. That's --
21 but who am I -- just because I don't -- just because
22 they don't do things the way I do things, and my
23 opinion is that I don't agree with it. I don't
24 agree with that approach. But that's my own
25 personal opinion. And, you know, I mean, who am I

1 to judge another person or another organization, you
2 know, who am I?

3 **Q Okay. Why don't you approve of them as**
4 **militants?**

5 A Because --

6 **Q I'm going to withdraw the question. That**
7 **was a C-minus question. I'll ask the question a**
8 **different way. What is it about militancy that you**
9 **don't approve of?**

10 A Well, I just -- as I said, you know, like
11 the marching -- the marching through the streets
12 with the chants F Antifa, F Antifa, I just, you
13 know, it just doesn't resonate well with me. I
14 believe we should approach people with love. I
15 think that if Antifa is a bunch of lost kids that
16 are being indoctrinated, and have a skewed reality on
17 things, I think that they should be reached with
18 love, I think you should try to engage them in
19 conversation and try to share with them your
20 opinion, instead of coming out in an aggressive way,
21 I should say.

22 **Q By aggressive, are you also saying that you**
23 **disapprove of the potential for violence that that**
24 **reflects?**

25 A I would never -- I would never condone

1 violence or violent acts, ever. I believe in the
2 show of force, but I believe that that should be
3 done through our county sheriff's and through the
4 legal laws, the conditional laws that are already on
5 the books. We have avenues in which we could stand
6 up and fight for our rights, but that should be done
7 legally, and it should be done through the channels
8 the county sheriff.

9 **Q Is your disapproval, to use the word you**
10 **used, of Antifa because you conclude that the Proud**
11 **Boys may not have the same views about using**
12 **violence as you have expressed?**

13 A I wouldn't use violence. I wouldn't use
14 violence. If you talk about fighting for our
15 liberties and freedoms from an oppressive or a
16 tyrannical government, I believe that that movement,
17 or that fight, should be conducted through the
18 office of county sheriff and local county elected
19 officials.

20 **Q That wasn't my -- but listen to my question**
21 **and answer my question. Is part of your disapproval**
22 **of the Proud Boys, and their militancy, is because**
23 **you believe that they are more open to violent**
24 **action than you approve of?**

25 A Yeah, you could say that I guess yeah. I

1 don't think that you should ever go into the streets
2 and single out a particular group with an aggressive
3 nature.

4 Q That's what I'm asking. You stated in one
5 of your -- and you also said that you disapprove of
6 them because they march militantly down the street,
7 and they say things, the words you used is, the
8 example you gave was F Antifa they don't say F
9 Antifa, they actually use the word, right?

10 A Correct.

11 Q Okay. Great. And so you said that you
12 don't approve of violence. Have you ever, to your
13 recollection, stated publicly or tweeted or posted
14 that violence is acceptable under certain
15 conditions?

16 A I don't know if -- I can't recollect if --
17 I can't say that I haven't ever said anything driven
18 by emotion or under a certain set of circumstances
19 late at night on social media when I would just --
20 but my position before you today, in my nature is
21 peace. I don't believe in violence. I don't
22 believe in, I don't believe in taking up arms. I
23 don't believe, unless, unless it's done through the
24 county sheriff and legally.

25 Q You indicated that you knew -- you've

1 actually been around the Proud Boys at times. How
2 about -- did you see the Proud Boys on January 6th,
3 when you were at the Capitol in Washington D.C.?

4 A I don't know. I possibly -- in the crowd.
5 I mean there was millions of people there that were
6 all milling around. But I didn't have any, I didn't
7 have any direct conversations with anybody that
8 identified themselves as a Proud Boy, that I can
9 recall.

10 Q I'm asking a different question, which is
11 do you recall seeing anybody there that you
12 identified as people that were in or associated with
13 the Proud Boys?

14 A No, I don't recall.

15 Q Do you know individuals that, you know, are
16 or were, members of the Proud Boys or associated
17 with Proud Boys?

18 A I wouldn't say that I know any. I've met
19 some before casually in passing.

20 Q Who?

21 A And, you know, I've visited with them, I've
22 visited with them about you know, probably just
23 concerns that everybody has, you know, but I've met
24 Enrique before. I've met Enrique Tarrío. I know
25 that I met him one time while in Washington D.C.

1 just casually in passing. But I don't know him and
2 he doesn't -- I mean, it's not like I have a
3 friendship with him or a personal any kind of a
4 personal connection. I know that I met him once, I
5 know, the Trump Tower in Washington D.C. but that
6 was like probably it was probably three years ago
7 probably.

8 **Q When you said, just now that you met him at**
9 **the Trump Tower in Washington D.C., do you mean the**
10 **Trump Hotel in Washington D.C.?**

11 A Yeah, whatever. Yeah.

12 **Q I just wanted to make -- so that we have a**
13 **clear record here. You said that you've spoken to**
14 **some members of the Proud Boys. Who did speak to?**
15 **Who did you have conversations with that were**
16 **members of the Proud Boys?**

17 A I don't know. I don't know their names. I
18 couldn't tell you one name of any Proud Boy right
19 now, that I know personally, that I know. And the
20 only reason why I know that I've seen them before,
21 is because I've been out so much at different events
22 and stuff, and I've seen the guys with the orange
23 and black insignia on it that I've shaken hands with
24 and I've spoken to before but just casually in
25 passing saying you know, but I don't know it. I

1 don't know any Proud Boys.

2 **Q But you did testify that you've had several**
3 **conversations with, you said more than one**
4 **conversation, with people that you knew were Proud**
5 **Boys. You can't identify them. When did you have**
6 **those conversations?**

7 A I don't -- you know, I know that there was
8 a small group of them in -- at a rally that I went
9 to in Phoenix, at the Capitol, at the State Capitol.
10 I forget -- I don't even know when it was. It was
11 probably last summer, I think. And there was a
12 group of them that were there, and but they were
13 just there in the crowd. They just came to, you
14 know, support the event I guess, and I know that I
15 visited with a few of them there. And but you know,
16 I say that I've talked to them in D.C. but I can't
17 -- I'm sure I have.

18 But I don't recall exactly where and what
19 place. You know, there's a lot of guys that
20 associate themselves with Proud Boys, it's a huge
21 organization and yeah.

22 **Q Tell me what you do recollect about any of**
23 **those conversations. What you recollect in terms of**
24 **what you said to them and what they say to you?**

25 A I don't know. I don't know. I'm under

1 oath, I don't want to lie. I don't know what was
2 said.

3 Q I'm going to instruct you --

4 A It was casual, you know. It's not like, I
5 sure would never instigate them. I sure would never
6 encourage them to be violent, or to do anything
7 disorderly or disruptive. I know that.

8 Q Again, I just want to tell you, that your
9 oath means, when you have sworn to tell the truth
10 your oath means --

11 A --

12 Q Let me finish. You can't hide behind the
13 fact that you can't remember every specific detail,
14 when I ask you to tell me what you do remember your
15 oath requires you to tell me what you do remember.
16 Even if it is not specific, and it's general. So
17 I'm going to ask it again.

18 Tell me what you do remember about your
19 conversations with any of the Proud Boys,
20 irrespective that you can't identify who they are or
21 when you had the conversation.

22 A I don't remember. I can't make something
23 up. I know you would love for me to have a big
24 story and but I'm not going to make up something
25 that I don't remember. I do not remember.

1 Q Okay.

2 A Okay.

3 Q Okay. You said that. That rally in
4 Phoenix last year, where you remember having some
5 conversations with some of the Proud Boys, that
6 rally, what was the purpose of that rally?

7 A I believe it was to bring attention to the
8 January 6 prisoners that are still being held in
9 solitary confinement right now. I think that's what
10 it was about.

11 Q You were in solitary?

12 A And there was -- there was state
13 representatives there that spoke. Walt Blackman I
14 know, he's a friend of mine and I know Walt was
15 there at that rally and you know, I don't even know
16 who all else was there. But I remember Walt.

17 Q How about Ben Bergquam, the person who
18 raised the \$50,000 for you on givesendgo?

19 A Yeah, he's a good friend, a good guy

20 Q He was a former member of the Proud Boys
21 wasn't he?

22 A I don't know. I didn't know that.

23 Q You didn't know that. He's a good friend
24 of yours. You've actually -- all right. Go ahead.

25 A Yeah but he's never disclosed, he never

1 disclosed -- that's the first that I've ever heard
2 that Ben was a part of the Proud Boys. But Ben is
3 one of the most peaceful guys and gentle guys that I
4 been around. So, yeah, I didn't know that he was a
5 part of the Proud Boys. But that should just be
6 for the organization of the Proud Boys, there's
7 probably a lot of guys involved in the Proud Boys
8 just like Ben, that really are good guys, that are
9 really gentle, peaceful patriots that love our
10 country. You can't lump everybody together because
11 of the actions of a few.

12 **Q Aside from the meeting with one or more of**
13 **the Proud Boys including Enrique Tarrío in D.C. at**
14 **the Trump Hotel --**

15 A I didn't meet with him. I didn't meet with
16 him, I met him. I met him in passing, I remember
17 shaking his hand and saying hi with him. So I
18 didn't meet with him.

19 **Q That's fine. You made that clear. Aside**
20 **from that and aside from the rally last year in**
21 **Phoenix where the Proud Boys were, have you, or**
22 **Cowboys for Trump, been into any other rallies,**
23 **events or activities with the Proud Boys?**

24 A Not that I can remember, no.

25 **Q Let's talk about the Oath Keepers are you**

1 **aware of an organization called the Oath Keepers?**

2 A Just one second. What was your question
3 again?

4 Q **Are you aware of an organization called the**
5 **Oath Keepers?**

6 A Absolutely.

7 Q **What do you understand that organization,**
8 **the Oath Keepers, to be?**

9 A I understand them to be exactly what
10 they're name states. They want people to honor
11 their oaths of office.

12 Q **Are you a member of the organization?**

13 A No, I'm not a member of the organization.

14 Q **Do you know any persons who are members of**
15 **the Oath Keepers?**

16 A Yeah I know Stewart Rhodes, the founder.

17 Q **Who's the -- that's Stewart who?**

18 A Stewart Rhodes, the founder of the Oath
19 Keepers.

20 Q **How do you know Mr. Rhodes?**

21 A Just from being around events and stuff
22 that he -- where we were -- I saw him at the -- the
23 last time I saw Stewart was at CPAC in Dallas, maybe
24 a year ago. A year and a half ago.

25 Q **Who else do you know who are members of the**

1 **Oath Keepers?**

2 A Stewart would be the only one that I know.
3 That I can say that I know that he's -- that I know
4 his name and know who he is, and actually say that I
5 know him.

6 **Q Is there anything about the Oath Keepers**
7 **activities that you disapprove of?**

8 A I don't think that I know their activities
9 well enough to be a judge of that.

10 **Q Have you --**

11 A I'm not going to make judgment off what the
12 media tells me, or what the government says about
13 them. I form and develop my opinions off of
14 personal knowledge, personal first-hand experience.
15 And I don't know enough about the organization to
16 really say -- really have judgment on.

17 **Q On the basis of your own personal**
18 **experiences, is there anything about the Oath**
19 **Keepers that you disapprove of?**

20 A Not necessarily because I -- I mean, I
21 really haven't been around them enough, and I don't
22 know enough about them to really approve or
23 disapprove of anything. My understanding of the
24 organization is they just want officials,
25 politicians to honor their oath of office.

1 **Q Have you, or the Cowboys for Trump, been**
2 **involved in any rallies, events, or other activities**
3 **with the Oath Keepers?**

4 A Yeah, I went to an event out in Washington
5 D.C. that -- it was back behind the White House in
6 the little grassy area and Stuart was there, and he
7 spoke at the event. I don't know, I think I was
8 already -- I don't know if I had my horse out there.
9 I can't remember, but I know that I spoke at the
10 same event -- at an event that Stuart spoke at.

11 **Q When was this event?**

12 A Probably two years ago. Three years ago,
13 maybe three years ago. It was probably two or three
14 years ago or something like that.

15 **Q Was it outside the White House grounds or**
16 **was it on the White House grounds?**

17 A Well, it was behind the White House.

18 **Q Was it within the fence behind the White**
19 **House or was it outside of the fence?**

20 A No, it was outside of the fence. It wasn't
21 at the White House.

22 **Q It wasn't on the White House grounds**
23 **itself?**

24 A No, no.

25 **Q All right --**

1 A I just don't know what you consider the
2 White House grounds. But, no, it wasn't inside the
3 fence.

4 **Q What was the purpose of that event?**

5 A You know, I think it was just kind of the
6 same as every event that I go to, just speaking out
7 about personal freedoms and personal liberties and
8 yeah, the future of our country.

9 **Q What did you say at that event?**

10 A That's a great question. I don't know.
11 Probably what I say at most events. Just a concern
12 for our country and for freedom and for liberty. And
13 mostly the importance of locally elected officials
14 honoring their oath of office.

15 **Q At that event, did you say anything about**
16 **the election being stolen?**

17 A No. No, it was before. It was long before
18 the election. It was, like, probably, like, three
19 years ago.

20 **Q Do you know an organization called the**
21 **Three Percenters?**

22 A I know about them. I don't know any
23 individuals that belong to that organization. That
24 I know do, I mean, you just told me that Ben was a
25 Proud Boy at one time. I don't know anybody

1 directly or individually or personally that's a
2 Three Percenter.

3 **Q What do you understand the Three Percenters**
4 **are, as an organization?**

5 A I don't really have much understanding. I
6 know that, I guess there was three percent. It was
7 three percent of the population that led the
8 American Revolution of 1776, I guess. I don't know.
9 If that's correct or not. Something about three
10 percent of the population that did something. I
11 don't know if it was during the American Revolution
12 or what exactly it was. I'm not familiar with the
13 organization.

14 **Q Do you understand that the Three Percenter**
15 **organization approves of violence at times in order**
16 **to accomplish the purposes that it considers**
17 **legitimate?**

18 A No, I didn't know that about them.

19 **Q You understood that the American Revolution**
20 **was a violent event didn't you?**

21 A I know that the American Revolution of 1776
22 is what founded our country today.

23 **Q That's not what I asked.**

24 A I think that's why we celebrate the 4th of
25 July, isn't it?

1 Q I asked a different question. So let me
2 ask the question again and I'll see if I can get you
3 to answer my question. You understood -- you
4 understand that the American Revolution was a
5 violent event?

6 A I believe that it was organized, wasn't it?
7 Wasn't it an organized, yeah.

8 Q I didn't ask that question I asked you a
9 different question listen to my question, and answer
10 my question.

11 A Okay.

12 Q You understand that the American Revolution
13 was a violent event, don't you?

14 A I mean, I don't know. I don't really know
15 my history all that well to be honest with you, and
16 you know, I know that -- I guess it's called the
17 American Revolution, so if it was a revolution then
18 I guess, you know it was -- a, yeah, maybe it did
19 contain violence. I don't know.

20 Q Was that violence that was justified?

21 A I don't know. I don't know enough about it
22 to say yes or no or anything in between. I don't
23 know.

24 Q So can you identify any people who are
25 members of the Three Percent organization?

1 A No I don't know any. I don't know any
2 Three Percenters.

3 **Q Have you or the Cowboys for Trump**
4 **organization been in any events where you knew that**
5 **there were Three Percenters there?**

6 A No. Not that I knew. Now on January
7 the 6th, I saw flags that had the three lines in
8 them, and I guess those are maybe that's their
9 markings for their group like the Proud Boys wear
10 this stuff or whatever, you know I can't say that I
11 haven't been to an event where there wasn't Three
12 Percenters. But I didn't have association with
13 them.

14 **Q You remember the Cowboys for Trump being at**
15 **a rally on September 12, 2020, don't you?**

16 A That's correct.

17 **Q Where was that really?**

18 A In Washington D.C.

19 **Q What was that a rally about?**

20 A It was to Stop the Steal rally. It was a
21 rally where people gathered because they were
22 concerned about the integrity of our elections and
23 they gathered to peacefully protest, and I was
24 there.

25 **Q Wasn't that -- maybe we're talking about**

1 different rallies. Wasn't there a rally in
2 New Mexico where the Cowboys for Trump participated
3 in on September 12, 2020?

4 A Oh, I thought you were talking about the
5 12/12 rally in Washington D.C.

6 Q No. September 12, 2020, didn't Cowboys for
7 Trump participate in a rally in New Mexico?

8 A Possibly. I've been to a lot of rallies in
9 New Mexico and I very well could have been at one in
10 New Mexico on that day.

11 Q That would be a rally -- do you remember
12 being -- this is Cowboys for Trump being in a rally
13 in New Mexico with the New Mexico civil guard?

14 A You know the civil guard, they were around
15 a lot of the different rallies and stuff I mean,
16 they would show up, but I don't have, you know, I
17 don't have any contact with anybody from that
18 organization or -- there was -- if that was the same
19 rally that I'm thinking of I was there with my
20 horse, and I spoke.

21 Q That'd be the rally in Rio Rancho,
22 New Mexico?

23 A Well no, I'm talking about the one at the
24 state capitol. Are you talking about the one at Rio
25 Rancho?

1 **Q Yes?**

2 A Oh yeah, the Black Lives Matters rally.

3 **Q Yes. You were there?**

4 A Yeah, I went -- we took our horses to the
5 Back Lives Matter protest, and I'll tell you
6 something about that protest. There was a lot of
7 people there was a lot different political opinions,
8 but we were -- I was able to start having dialogue
9 with these people and we were able to start, kind
10 of, talking out some of our differences, and the end
11 march was the Rio Rancho Police Department in single
12 file line and lined up as soon as the police showed
13 up and all their battle gear and everything. That's
14 when everything started getting chaotic. I think if
15 the police would have stayed away, I think that a
16 lot of the people there, including us, could have
17 actually communicated with these people and maybe
18 even worked out some of our differences.

19 **Q The New Mexico civil guard was at that**
20 **rally in Rio Rancho, correct?**

21 A I don't know if they were or not.

22 **Q You don't know that?**

23 A No, I don't know.

24 **Q And the Three Percenters were there also at**
25 **the Rio Rancho rally, were they not?**

1 A I don't know if they were or not. I don't
2 know. I don't remember talking to anybody at that
3 rally that identified themselves as a Three
4 Percenter or a --

5 **Q And there was violence at that rally,**
6 **wasn't there?**

7 A I didn't witness any violence myself. I
8 saw a lot of -- or I saw some, I should say, yelling
9 back and forth. But who knows, that might have been
10 FBI informants. That may have been paid agitators
11 that were in the crowd. But I didn't see any
12 physical violence.

13 **Q You saw no physical violence at a rally?**

14 A Not that I recall, no.

15 **Q You do recall hearing or seeing people**
16 **yelling at each other?**

17 A Yeah, I do.

18 **Q Do you know anybody that's in the**
19 **New Mexico civil guard?**

20 A No, not personally. I believe I -- I think
21 I know one guy. I went -- it's funny that you say
22 that, because last night or yesterday afternoon, I
23 went to a pro-life rally in Las Cruces, and whenever
24 I was walking back to my car, there was a man that
25 was sitting in the truck, and I got in my car, and I

1 left and then he sent me a text, he must have my
2 number from some where, but I think that he's in the
3 civil guard, and he just said he was sitting in his
4 truck keeping an eye on things, making sure
5 everything was peaceful.

6 **Q Do you know who that was?**

7 A No, not off the top of my head. No, I
8 don't know his name.

9 **Q But it was somebody who knew you well
10 enough to know a telephone number to text you?**

11 A He had my phone number, and whenever he
12 texted me it just came up as his number on there.
13 It didn't come up as his name or anything, that's
14 why I don't know who the man's name was.

15 **Q And why did you testify that you thought he
16 was a member of the New Mexico civil guard?**

17 A Because I scrolled back up through my
18 messages, trying to find out who he was, and I saw a
19 picture of him with a helmet on and a vest and
20 stuff, and I think that he was part of a New Mexico
21 civil guard, but that's the only way I -- I just
22 tried to identify who he was.

23 **Q So in the scrolling up on the text string
24 that you just testified to, is it correct then that
25 you've had other communications with this person?**

1 A Yeah, there was a few text messages in
2 there so maybe he texted me at a different time. I
3 don't know. But I don't know him personally. I
4 don't know anything about him, but again as I said,
5 to what -- if I recall his text last night, he said
6 that he was just sitting in his truck, making sure
7 everything remained peaceful. And I appreciate that
8 I'm glad there's men out there, especially in this
9 dangerous world that we live in.

10 I'm glad that there's men that are willing
11 to stand on the outskirts, and armed as well. I'm
12 glad that they're willing to carry firearms with
13 them in their lawful right inside of their vehicle.
14 I'm glad that there's men out there that are willing
15 to do this, because we live in a very dangerous
16 world right now and we may need a quick response.

17 **Q In this -- I want to go back to your texts**
18 **string and the scrolling activity from last night.**
19 **When you scrolled up and looked at the text frame,**
20 **did you see that you also had texted this fellow,**
21 **that you've identified as a member of the civil**
22 **guard?**

23 A I'm not sure.

24 **Q You're not sure. Okay so you're aware are**
25 **you not, Mr. Griffin that New Mexico civil guard has**

1 **been accused of being engaged in violent activities**
2 **is that not correct?**

3 A I'm aware of an incident in Albuquerque
4 where a New Mexico civil guard man was attacked, and
5 his life was threatened, and he had to use his right
6 to self defense, and unfortunately takes a life of
7 another man. And it's very sad to have seen that
8 happen, but maybe if that other man wouldn't have
9 threatened his life, maybe that incident wouldn't
10 have occurred because he is wasn't the agitator of
11 it. From what I now know about the case.

12 Q **That's a specific example. Is that the**
13 **only thing you know about the New Mexico civil**
14 **guard? So I'll ask the question again. You're**
15 **aware, are you not, Mr. Griffin that there is --**
16 **there are people who have accused the New Mexico**
17 **civil guard of being a violent organization?**

18 A No, I'm not aware of that.

19 Q **You're not aware of that?**

20 A Huh-uh.

21 Q **Okay. Do you remember speaking at a rally**
22 **in August of 2020 where this civil guard, New Mexico**
23 **civil guard was?**

24 A No.

25 Q **You remember being in a rally in November 9**

1 **where, in Albuquerque, where the civil guard was?**

2 A No. I remember going to a rally in Clovis,
3 and it was originally organized by the Republican
4 Party and we were asked to participate, and so we
5 were going to go, and then the Republican Party
6 withdrew because, I don't know, they didn't want to
7 be associated with the rally I guess, and then all
8 of a sudden it was just, the headline was that it
9 was just us and the New Mexico civil guard whatever
10 their organization looks like, it was just going to
11 be us that was going to be there.

12 And I had made a statement that I was going
13 to go any ways. Because I wasn't going because of
14 any organization, I would -- just wanted to go to be
15 able to speak and then it's kind of ironic because
16 then the next time I saw a headline it said the
17 New Mexico civil guard was going to withdraw because
18 I was going to go to it. So whatever, that's really
19 all I know about the New Mexico civil -- I mean I
20 don't really know anything about their organization,
21 or any allegations that had been made against them.

22 **Q How about QAnon, have you heard -- let me**
23 **ask the question. Have you heard of an organization**
24 **called QAnon?**

25 A Yes, sir.

1 **Q What's your understanding of QAnon?**

2 A What I've been explained is, there's two
3 different organizations. There's the Q, the Q
4 movement, and then the QAnon movement. And I've
5 heard that the QAnon is -- more tries to undermine
6 and makes false predictions, if you will, that this
7 is going to happen, and this is going to happen, and
8 then it never does. Only in an effort to try and
9 undermine the Q organization.

10 But you know, I've talked to people about
11 it. They say that it's an inside intelligence
12 organization that has inside information and you
13 heard about the Q drops, or whatever, where they
14 dropped the information and you know everybody tries
15 to decipher it or figure it out or whatever, but I
16 haven't followed it, you know, I don't. I follow
17 Jesus I don't follow all the other stuff that people
18 are putting their faith in. My faith is only in the
19 Lord Jesus Christ.

20 **Q So I take it then, that you're not a member**
21 **of the QAnon organization?**

22 A I didn't know they had a membership, but
23 no.

24 **Q Do you support QAnon?**

25 A I don't -- the QAnon, do I support it?

1 Q Yes.

2 A I don't know, I wouldn't say that I don't
3 support it because they come under attack so much by
4 the media, and the left is and it's always the Q, Q,
5 Q. They're the bad people. And honestly whenever
6 that sort of stuff starts happening I wonder if
7 they're really good, you know, they might be an
8 actually really legit, good organization. But yeah
9 I don't know enough about them, I don't follow the
10 QAnon stuff. I'm not -- I know people that do.
11 That -- all they can talk about, is the Q, QAnon or
12 the recent latest Q drop, but I've got too many
13 other things to think about and worry about than
14 following the Q movement.

15 Q You're aware are you not, that QAnon has
16 been associated with violence?

17 A No. I didn't know that. I didn't know
18 that they have an organization that's violent. I
19 know Antifa is, I know Antifa is a very violent
20 organization. I know that Black Lives Matters burned
21 down all of our cities across America, not that long
22 ago. I didn't see the QAnon out there doing that.
23 I didn't see QAnon doing what Black Lives Matters
24 did or Antifa did.

25 Q So it's your testimony, under oath, that

1 **you're not aware that people have associated QAnon**
2 **with violence?**

3 A Under oath.

4 **Q Okay. Great. But you do, in fact, support**
5 **QAnon?**

6 A I wouldn't say that I support QAnon, no. I
7 didn't say that I support QAnon. I don't know
8 enough about them to say that I do support them, or
9 I don't support them. Anything that is making
10 predictions that don't happen, I don't support. And
11 the QAnon has made a lot of predictions that didn't
12 happen. So I would stop short -- or I could
13 probably honestly say that I don't support QAnon.
14 But the Q the Q movement, without the anonymous.
15 The Q I don't know enough about -- if they're a good
16 intelligence agency, then by God, I'd support them.

17 MR. GOLDBERG: Would you put up Exhibit 11
18 please, Chris.

19 (Deposition Exhibit No. 11 marked.)

20 **Q (BY MR. GOLDBERG) You see we're showing**
21 **you what we marked as Exhibit 11 to your deposition**
22 **Mr. Griffin you see that. You seen that before**
23 **haven't you?**

24 A I have. And I'd like to say that when did
25 I post that. February 13, I've learned a lot since

1 February the 13th, 2022, your opinions can change as
2 you learn more information so just because I tweeted
3 something, maybe driven off of emotion, maybe after
4 I had just read something and I tweeted that,
5 doesn't mean that I still stand on and have the same
6 opinion today, and I did that once again, off of my
7 own personal media platform in which I should be
8 protected under the First Amendment to tweet, so.

9 **Q Let me ask a few questions about it. You**
10 **posted this tweet, correct?**

11 A Sure.

12 **Q That's your handle.**
13 **CouyGriffin@CowboyCouy?**

14 A That's correct.

15 **Q And that in February of 2022?**

16 A Uh-huh.

17 **Q Read into the record what your tweet is**
18 **above the four flags that you put down there?**

19 A Yeah.

20 **Q Go ahead and read what you tweeted?**

21 A Trust the plan. But what is that, what's
22 the plan you know, I might have saw something that I
23 agreed with. That was -- that had something to do
24 with the plan, and I said trust the plan, where we
25 go one, we go all.

1 Q WW it doesn't say, Where we go one, we go
2 all --

3 A That's right.

4 Q Hold on. Let me ask the question. We're
5 going to help the court reporter here?

6 A Okay.

7 Q Doesn't say where we go one we go all, it
8 says WWG1WGA?

9 A That's true.

10 Q You understand, don't you Mr. Griffin, that
11 that cryptic phrase or signal WWG1WGA is a signal
12 used by QAnon to mean where we go one we go all,
13 correct?

14 A That's correct. And I think it's beautiful
15 you know, that's what patriots should do, we should
16 all go together and you know I'm sitting before you
17 in this deposition today, but there's a lot of
18 people that feel the same way that I do, and they
19 support me. They go with me through this monkey
20 process I'm in.

21 Q When you posted this tweet on February 13,
22 2022, you were supporting QAnon, you meant it then
23 didn't you?

24 A I might have meant it at that certain time,
25 but that doesn't mean that I'm a supporter of QAnon.

1 Q All I'm doing is getting your testimony
2 out.

3 A Sure.

4 Q Are you saying that you've changed your
5 mind since February 13, 2022?

6 A No. I'm saying what I just told you a
7 minute ago about QAnon, I think that they make a lot
8 of false predictions, that never pan out you know,
9 and I don't -- but you know, in my defense, I might
10 have seen a video or I might have got through -- I
11 might have, you know, read something that sparked me
12 at that time to believe in the statement that I made
13 at that time.

14 But that doesn't mean that I'm -- by me
15 making one tweet, months ago doesn't mean that I'm
16 part of the organization or I support the
17 organization. I think you're grabbing at straws.

18 Q Okay. Well you've challenged me so I'm
19 going to tell you something. Are you testifying
20 that this is the only time you have used the phrase
21 WWG1WGA? Isn't it true, Mr. Griffin, that when I
22 look at your tweets I see that phrase being used
23 over and over and over again?

24 A I wouldn't say over and over and over, but
25 I would definitely say that I've absolutely used it

1 before. And I love it. I think it's a great -- I
2 think it's very catchy. I think it's a great catch
3 phrase, where we go one, we go all. I think it's --
4 there's a great ring to it, and I like the phrase
5 and I've used it a lot. I've said it in speeches
6 too.

7 I said it at the end whenever I stopped --
8 when out in Vegas, I've said it at a speech where I
9 gave, where we go one we go all and I think it's --
10 I think unifies the patriot movement and I think it
11 makes everybody feel like they're included in
12 standing up for freedom.

13 **Q When did you first decide that you were**
14 **going to go to Washington D.C. for the Stop the**
15 **Steal rally on January 6th, 2021?**

16 A When I first decided I was going to go. I
17 don't a -- I'm not sure the exact date. It was
18 probably about, maybe 11 or 12 days before I --
19 before January the 6th, whatever that was, I don't
20 know. You know, it was kind of spur of the moment.
21 The Women for America First, the bus with Amy Kremer
22 and the whole platform they were coming through El
23 Paso and I think, as I stated before, I think Matt
24 was the first one that got wind of it coming
25 through, and maybe he made contact with him to begin

1 with, I'm not sure.

2 But, yeah, I just you know, anybody that's
3 willing to stand up and you know stand up for
4 election integrity and what I believe was you know,
5 a compromised election.

6 **Q Why did you want to go -- strike that.**
7 **I'll ask the question differently. Why did you want**
8 **to go to Washington D.C. to Stop the Steal rally on**
9 **January 6th?**

10 A Because I was concerned. Because I'm still
11 concerned as I've already explained to you about the
12 integrity of our elections. And I feel like God's
13 given me a voice to speak. I feel like God's called
14 me to speak, and so being obedient to that call and
15 being concerned about the integrity of the elections
16 I wanted to go speak and do so peacefully, and well
17 inside of the law.

18 **Q And how -- what did you understand was**
19 **going to happen in Washington D.C. on the 6th of**
20 **January that you wanted to go and participate?**

21 A I didn't know what was going to happen. I
22 didn't know what the rally was going to look like.
23 I didn't know the size the crowd that was going to
24 show up. But I knew that Donald Trump had made the
25 call, and he called all patriots to D.C. to stand

1 alongside each other and peacefully protest, what is
2 going to one day go down, I believe as a fraudulent
3 election in American history. So that's why I went.

4 Q And you understood that January 6th was
5 selected because that was when Congress was going to
6 meet in order --

7 A No, I didn't even --

8 Q Let me finish asking the question before
9 you -- you understood, didn't you Mr. Griffin, that
10 January 6th was the day that they were going to have
11 the rally, because that was the day that Congress
12 was going to meet in order to count votes. That was
13 the election that was being stolen, correct?

14 A No. I didn't know the dynamics of that
15 day. I didn't know that you know, I knew -- well I
16 can't say that. I knew that from the lead up and
17 what I would gather, I knew that it was going to be
18 certified, but I didn't know the processes on the
19 certification.

20 I didn't know, you know, I didn't know the
21 dynamics of how it was certified. I didn't know
22 that Mike Pence was going to be inside of the
23 capitol and that at that would make that a
24 restricted and an unauthorized zone. If I would
25 have known that, I would have never crossed over on

1 to the grounds that were deemed unauthorized or
2 restricted. There was no signage there there was no
3 indicators, that it was unauthorized.

4 I thought I was well within my
5 constitutional right to be there. And, but I had no
6 intention of walking down to the Capitol on that
7 day. I had no -- whenever we went I thought it was
8 just, I thought it was just going to be a rally at
9 the Ellipse. And I thought I was going to -- to be
10 honest with you because I had been a part of the
11 America First -- Women for America First platform at
12 every stop. You know, we went on south we went
13 Tennessee, Georgia, Alabama, and I had an
14 opportunity to speak at each one of those rally
15 stops. We didn't travel with the group per se. We
16 weren't really -- we weren't even really engaged
17 with the main group that were putting on the
18 rallies. We travelled independently. We travelled
19 on our own dime.

20 And uh -- and all we would -- all Matt and
21 I knew is just where the bus was going to be and the
22 time it was going to be there. And so we just
23 showed up. I had an opportunity to speak. We got
24 to, I believe it was Birmingham, Alabama, and none
25 of the speakers were there. Greg Lock, Brian Evans

1 I think, none of the speakers -- Dustin Stockton and
2 his wife, Jennifer Lawrence, none of those people
3 were -- I think it was Birmingham and -- or they
4 weren't there to speak. Jennifer came out. Jennifer
5 came out, she was just wearing sweatpants and a
6 sweatshirt and she was like sorry everybody, all the
7 speakers have already gone on to Washington D.C.
8 we're just going to roll on through.

9 And I told her I was dressed up, I was
10 ready to go, I said I'd like to speak, I'm here and
11 so I have the opportunity to speak in Birmingham.
12 And then the next stop was going to be Atlanta,
13 Georgia and we have to the stop where the bus was
14 supposed to be, well Matt and I pulled into the
15 parking lot where the bus was supposed to be and the
16 bus never showed up. It was like -- it was almost
17 like we got shoved, and I thought, well, that's,
18 kind of, odd. They should have let us know. But we
19 went ahead and went on to Washington D.C.

20 And then on the morning of January the 6th,
21 I thought that I was going to be included again in
22 the rally. I thought I was -- I mean I've been
23 speaking right alongside those people the whole
24 time. Well, when we got to the Ellipse we walked
25 back where the gate was, where the kind of I guess

1 the VIP's if you will, or whatever were going
2 through. And we tried to go through and we weren't
3 on the list or anything. We weren't, we weren't one
4 of the guests, and so we were trying to get ahold of
5 Amy Kremer, we were calling her, we were texting,
6 we were going what's up, are we going to be allowed
7 to to be a part? And she never would respond to any
8 of our text messages or anything.

9 And then we saw her, and she was on the
10 other side of the fence and we yelled out and we got
11 her attention, and we said Amy Amy, I said, is this
12 where we're supposed to go in at, and she goes no,
13 there's another gate at the front. Just go around,
14 you guys are on the list at the front. Just go
15 around to the front gate. Well we walked around
16 there and there wasn't any other gate, you know, and
17 there was tons of people so Matt and I just drifted
18 back up by the Washington Monument and we listened
19 -- we find Trump, finally came out, the wind was
20 blowing freezing cold and he spoke, and he just kind
21 of said the same old rigmarole, and that morning I
22 had gotten a text from Gary Chapman, he used to be
23 married to Amy Grant, a christian recording artist,
24 and Gary had texted me and said that there was a
25 brother from their church that had had a vision of a

1 million men praying -- million people all taking a
2 knee, to declare that Jesus Christ is Lord.

3 And he said, Couy, you might have an
4 opportunity to lead these people in prayer, and I
5 thought, man if I get on stage that's the first
6 thing I'm going to do, is ask everybody to
7 peacefully kneel to declare Jesus is Lord. Well,
8 long story short I wasn't included so I didn't have
9 the opportunity and I texted Gary back -- and I've
10 got these text messages recorded. I text Gary back
11 and I said, Gary I didn't have an opportunity to
12 speak and he said, Couy, you don't have to do it
13 from the main stage, just find a group of people and
14 a bullhorn. And get them started, and everybody
15 will start taking a knee to declare Jesus is Lord.
16 And I though, well, it was, like, that got laid back
17 on me. So when Trump was done speaking, Matt wanted
18 to go back to the truck, he was freezing cold and
19 he's shivering and he's wanting to go get go warm
20 up. And I'm, like, Matt look at all these people out
21 -- these old people that are out here freezing to
22 death, and let's just hang out let's find a bullhorn
23 and a group of people, and I'll pray with people.

24 And so we started walking down towards the
25 Capitol and the whole crowd was kind of walking that

1 way. And I saw different men and women that had
2 bullhorns that had groups of people captivated, but
3 it was like I never had -- I never felt the
4 opportunity that that was the place to do it at. We
5 finally get down in front of the Capitol, and
6 there's a black man and he's standing up on the
7 block retaining wall that's about four, or five feet
8 high. And he's preaching. And he's preaching the
9 gospel. He's preaching the truth in its purest
10 form. And I thought, this was going to be the
11 opportunity that I'm going to have to be able to
12 pray with people. And so I'm looking at the man,
13 and the man looks -- and there's a bicycle that's
14 leaned up against that blocked wall. And there's
15 people that are stepping at the seat of the bicycle
16 and stepping up on the blocked wall. And mind you,
17 it's five feet high, and there's people sitting all
18 around it. All over it. There's no signage.
19 There's nothing that says unauthorized zone or
20 restricted area, nothing of the sorts.

21 And this black man looks right at me and he
22 says, "Step up on the bike." And when he said that,
23 Matt thought that he said step up to the mike. And
24 Matt told me go, go. And I was, like, all right.
25 So I pulled my pants up. I stepped up on the

1 bicycle seat and I stepped up on the wall. And I
2 tried to get the man's attention again. And I never
3 could get his attention again.

4 I never could engage him again, and I'm,
5 like, this must not be the spot. And so I kept
6 walking up we mingled up in the crowd up towards the
7 front the Capitol. Again, there was no signs.
8 There was nobody telling us we couldn't be there.
9 It was just a crowd of peaceful people. We've got
10 it all on video. And we get up to the west side,
11 and there's people that are crawling up the steps
12 and clammering up the side of the building. And
13 I'm, like, there's no way I'm going to go be a part
14 of that. I told Matt, I says this is as far as I'm
15 going to go. And right about that time there was a
16 door that opened, and it opened to an outside
17 staircase that went up to the west side of the
18 terrace.

19 And so I walked over there, and I looked up
20 the stairs and it came out right above. It was
21 outside. It wasn't going into the building or
22 anything. There was nobody that was there telling
23 us that we couldn't go up some steps. So I walked
24 up an outside staircase, and I sat down and I look
25 down. And there was millions of people that was all

1 gathered around the Capitol all around. And as I
2 sat there taking it in, a man was walking up the
3 staircase and he had a bullhorn tied on the top of
4 his backpack. And I promise you, that bullhorn hung
5 on the back of my leg, and it was, like, tugging at
6 me.

7 And I looked down and he had a bullhorn,
8 and there was a million -- there was tons of people
9 down below. And I asked him, sir, can I borrow your
10 bullhorn? He goes, yeah. And I borrowed it, and I
11 turned. And I turned away from the Capitol. And I
12 told those people, we've been fighting too much. We
13 need to pray. Let's pray. Let's pray 2 Chronicle
14 7:14 over our Nation's Capitol. And I led thousands
15 of people in prayer. And when I was done praying
16 with them, we hung out a little bit longer, and then
17 we went back down the steps. We left on our own
18 accord. We were never told we couldn't be there.
19 We were never told to leave. I left on my own
20 accord, and then on January 17, I got arrested for
21 crossing into an unauthorized zone. And, you know,
22 here I sit today.

23 But I appreciate you letting me tell that
24 story. If you have any questions about it please
25 ask because I can clear anything up.

1 Q So when you decided to go to Washington
2 D.C. for the Stop the Steal rally, at some point you
3 thought you were actually going to be able to talk
4 at the rally, correct?

5 A That's right.

6 Q And you weren't able to talk at the rally?

7 A That's correct.

8 Q And when you decided to go to Washington
9 D.C., you knew that that was the day that the
10 election was going to be certified and that's why
11 the rally was there. You didn't know what the
12 mechanics were, what the details of the
13 certification were, correct?

14 A That's correct. I knew that Mike Pence
15 would be the final certification on the election but
16 yeah, I didn't know the dynamics of it.

17 Q And if I understood your testimony
18 correctly, when you decided to go, you weren't
19 thinking about going to the Capitol, you were
20 thinking about going to the rally at the election,
21 right?

22 A I'm sorry. One more time.

23 Q I'll say it again. When you decided to go,
24 before you went you were thinking you were going to
25 the rally at the Ellipse, you weren't thinking of

1 going to the Capitol?

2 A That's correct.

3 Q But you actually ended up going to the
4 Capitol. That's what you testified to, correct?

5 A That's correct.

6 Q And if I understood correctly, you ended up
7 going to the Capitol because you saw the crowd
8 moving towards the Capitol. And you went with the
9 crowd, correct?

10 A No. I went with the -- to pray with
11 people. That's why I walked down to the Capitol. I
12 didn't follow the crowd down there. There was a
13 crowd moving that way, but I went with the only
14 intent -- my only intent to go to the Capitol on
15 that day was to pray with people.

16 Q Why did you want to go to the Capitol to
17 pray with people? Was it just your ego, or did you
18 have a reason?

19 A No. It was because I felt like the Lord
20 was calling me to go. It was, you know, sometimes
21 God will speak through other people and whenever
22 Gary said that there was a brother from their church
23 that had a vision of a million people all taking a
24 knee to declare that Jesus is Lord, I felt like that
25 was a call that God was going to allow me to have.

1 Q What was your understanding as to why God
2 was calling you to talk to a million people to take
3 a knee?

4 A Because it was -- it could have been a
5 beautiful thing. It would have been beautiful to
6 have everybody that was gathered there all taking a
7 knee to honor the Lord Jesus Christ.

8 Q Did you have any understanding as to why --
9 well, let me stop. It ended up -- it wasn't a
10 million people, right?

11 A There was probably 2 million.

12 Q Oh, you think there was a couple million
13 people there?

14 A I'm telling you. Were you there?

15 Q No, I wasn't there.

16 A I was.

17 Q No. I'm learning something. So your
18 understanding is there was a million or 2 million
19 people there?

20 A I'm telling you from where I was at the
21 Capitol -- you've been to the Capitol I'm sure.

22 Q I have.

23 A Both of the side streets as far as the eye
24 could see was nothing but solid people. It was -- I
25 mean, I don't know what a million people look like

1 in a crowd. I've never seen a million people. But
2 I will say that it was unbelievable how many people
3 were in Washington D.C.

4 Q And you wanted to be part of that. And you
5 wanted to have those people pray?

6 A I wanted to -- well, I can't say that I
7 wanted to, but I will say that I felt like I was
8 being obedient to a call. And I wanted to serve the
9 Lord.

10 Q You also wanted to go to participate in the
11 Stop the Steal rally, correct?

12 A I wanted to go -- I mean, yeah, I wanted to
13 be in D.C. for a peaceful protest, which it was.

14 Q You also -- I want to make sure I
15 understand. You went -- in part you went because
16 the president called you to go, correct?

17 A In part, yes.

18 Q And you also went because you thought that
19 the November election was fraudulent, correct?

20 A I believe there was irregularities that
21 have been proven.

22 Q You actually called it fraudulent, didn't
23 you?

24 A Sir?

25 Q You actually called it fraudulent, didn't

1 **you?**

2 A Yeah, well, irregularities are fraud. I
3 mean, yeah.

4 **Q Okay. Well, that's all I'm trying to do.**
5 **You also went to stop the Biden presidency, didn't**
6 **you?**

7 A No.

8 **Q You did not? You didn't tell anybody that**
9 **you went to Washington D.C. on January 6 in order to**
10 **stop the Biden presidency? You never said that?**

11 A No. I don't recall ever saying that I was
12 going to D.C. to stop the Biden presidency. I
13 wanted to go to stand up for election integrity, and
14 I don't believe that Biden is the -- I believe that
15 there's irregularities, and I don't believe that the
16 vote, the 2020 vote, was a secure vote. And I know
17 it was, and I believe that there was irregularities
18 that have already been proven. I mean, I don't
19 understand how I could stop the Biden presidency.
20 How could I stop the Biden presidency? I can't --
21 me?

22 **Q You couldn't do that. You couldn't do it**
23 **yourself. You needed to have a million people in**
24 **order to stop the Biden presidency, right?**

25 A No. I don't know. Did it stop the Biden

1 presidency?

2 Q Did it stop? I don't know. Did it stop
3 the Biden presidency?

4 A Apparently not. I think he's the president
5 today, isn't he, or he's in Office?

6 Q Before you went to Washington D.C. -- well,
7 if I understood that long description you gave about
8 going there and what you did there?

9 A Yes, sir.

10 Q You and Mr. Struck essentially followed the
11 bus from city to city. And when you got to a city,
12 you went to where you understood the bus was going
13 to be, and you spoke at various cities along the
14 way, correct?

15 A That's correct.

16 Q And when you spoke at those various cities
17 along the way, Mr. Struck videoed you at those
18 times, correct?

19 A Yes, sir.

20 Q And when you were speaking at those various
21 cities, you were telling the people that were you
22 speaking to, among other things, why you were going
23 to Washington D.C., correct?

24 A I can't recall. I don't know. I don't
25 know. I don't recall. A lot of the times whenever

1 I speak, I just speak. I don't make speeches. I
2 don't read speeches. I don't have -- I don't
3 preplan speeches. Whenever I speak, I get up and I
4 just speak what comes to my mouth.

5 Q Well, let me ask about that. When you
6 speak about what comes to your mouth, are you
7 speaking the truth, or are you telling them lies?

8 A Oh, I pray that I'm speaking the truth. I
9 never want to tell a lie. I pray that I'm speaking
10 the truth.

11 Q So that's your intent. Your intent when
12 you spoke to them, you say you don't recollect
13 whether you told them why you were going to
14 Washington D.C. But if we look at those video
15 tapes, and you are telling them why you're going to
16 Washington D.C., you weren't telling them a lie at
17 the time, were you? You were telling them the
18 truth?

19 A Well, I hope so. You know, I don't want to
20 be a liar. I don't want to mislead people. I don't
21 want to be deceptive.

22 Q So at any time from the time you started
23 going to Washington to getting to Washington, did
24 you change your mind, or your opinion as to why you
25 were going to Washington D.C.?

1 A I may have.

2 **Q Well, tell me about that. What do you**
3 **remember about --**

4 A How can I tell you something that I may
5 have. I don't recall. I don't remember. Again,
6 whenever I speak -- it's just like when I tweet.
7 When I tweet, I do it at the time under the emotions
8 that I'm under and opinions can change, positions
9 can change, you know, I don't know. But if you want
10 to go back and dig through the dumpster -- sorry
11 about that. If people want to -- are you there?

12 **Q I am.**

13 A If people want to go back. If people want
14 to be dumpster divers and go grab little sound bites
15 and little clip and little this and little that and
16 try to build this narrative, then you could do that
17 off of the most peaceful God-fearing man in the
18 world, because we're all driven by emotion at times.
19 We all say things at times that maybe we don't
20 necessarily carry out or react -- or act on.

21 But they all should be protected under the
22 First Amendment. We should have a right to freely
23 express ourselves without being prosecuted on
24 something that we said out of emotion or on a tweet.
25 You know, you all have done a real good job going

1 through all the trash; digging out little sound
2 bites here and there, you know, and trying to make
3 me look like I'm an insurrectionist, which it's such
4 a heresy because it wasn't an insurrection on that
5 day. The media says that, the government says that.
6 It wasn't an -- insurrection.

7 There was no firearms that were confiscated
8 on that day, you know, it was peaceful. There was
9 lies, like, the lie about Officer Brian Sicknick
10 being beaten to death with the fire extinguisher
11 whenever the truth was. But whenever the truth was,
12 that never happened. Whatever the media and the
13 government was saying and everybody was gathering in
14 state and Joe Biden and Kamala Harris was saying
15 that Officer Sicknick had ben beaten to death with
16 the fire extinguisher, that was a lie.

17 **Q You were there?**

18 A It's never called -- and the fact of the
19 matter is and what are the odds that the very man
20 they say was murdered just so happened to die of
21 natural causes the next day. And in the case of
22 Rosanne Boyland, the media shamefully that she died
23 of a drug overdose. Whenever the truth was that she
24 was beaten to death in the west tunnel. That's
25 documented. That was filmed by a Capitol police

1 officer named Lila Morris, for the record. So
2 there's a lot of lies and deception about January
3 the 6th.

4 Q That I can agree with. But we may disagree
5 as to what are the lies and what are the deceptions.
6 So let me ask you. You weren't there when Officer
7 Sicknick was assaulted, were you?

8 A No. No.

9 Q You didn't see any of those things,
10 correct?

11 A As God as any witness, I didn't see one
12 officer be assaulted on that day. I didn't see one
13 officer be physically assaulted on January the 6th.

14 Q And you didn't see any guns there at all?

15 A No. Absolutely not.

16 Q And did you ever ask anybody whether they
17 had guns?

18 A No. I didn't go walk around asking people
19 if they had guns, but I didn't see any firearms.

20 Q You didn't? So when you were there on
21 January 6th, when you talked to people, you didn't
22 say to anybody, where's your gun?

23 A No, not that I recall.

24 Q Okay. So let's go back to, again, your
25 speeches that you gave in Washington D.C. And you

1 said you may have changed your mind during that trip
2 as to what your purposes were. Did you change your
3 mind, or did you not change your mind?

4 A I don't think -- my purpose was never
5 violent, or disorderly, or disruptive conduct. That
6 was proved through my acquittal. I was acquitted on
7 disruptive and disorderly charges. I didn't do
8 anything disruptive or disorderly on that day.

9 Q That's not what I asked you. I asked you,
10 on -- I was asking you whether you were telling the
11 truth when you told people on your way to Washington
12 why you were going. And you said you always wanted
13 to tell --

14 A Well --

15 Q Let me finish my question. You said you
16 always wanted to tell the truth. And then I said,
17 "Well, did you change your mind at all?" And then
18 interestingly you said, "Well, I may have changed my
19 mind." So did you change your mind or didn't you
20 change your mind?

21 A I don't know.

22 Q You don't know. Are you just saying that
23 you might have changed your mind because you were
24 worried about what you said to somebody on the way
25 to Washington? Is that what's going on?

1 A No.

2 Q Okay. Did you ever tell anybody that was
3 going on in Washington would be a war?

4 A It is a war. There is a war going on right
5 now, and it's a spiritual war. It's a war of good
6 and evil.

7 Q Did you ever tell anybody that violence was
8 an option that was not off the table?

9 A I didn't say that violence was an option.
10 I said that there was no -- I did say that there was
11 no option off of the table.

12 Q Including violence?

13 A Options? Are you -- how are you -- why are
14 you, all of a sudden, you're putting violence as an
15 option? I said there was no option --

16 Q I'm asking the questions?

17 A Okay.

18 Q Let's put up Exhibit 12. This is a tweet
19 that we talked about before in your deposition,
20 Mr. Griffin. And you said you couldn't remember
21 whether it was you or Mr. Struck who put up the
22 tweet, but you said that you agreed with it. Read
23 the first line --

24 (Deposition Exhibit No. 12 marked.)

25 A I can't read it. You're going to have to

1 zoom in.

2 Q It says violence needs to be our very last
3 option. Remember when that tweet was tweeted?

4 A No. But I don't think that was me. I
5 think that was Matt that put that up.

6 Q But you testified that you agreed with it.
7 So that's what I want to ask you?

8 A Violence needs to be our very last option.

9 Q You agree with that, right?

10 A Violence should never be -- yeah, well, no,
11 I don't. I would retract that. Because I don't
12 believe that violence shall ever be an option.

13 Q Violence should never be an option. So
14 what happens after there was a fraudulent election
15 and you can't change it?

16 A What happens what? I'm sorry.

17 Q So what happens? How do you change an
18 election when the election is a fraud?

19 A By trying to do what we've been trying to
20 do in Otero County and that's by auditing our
21 elections, but as you may well know, Otero County a
22 congressional oversight committee was formed with
23 its direct focus on Otero County which completely
24 shut the forensic side of our audit down.

25 And, you know, that's how you protect from

1 fraud is by auditing your counties and not by the
2 secretary of state, who I don't trust by saying
3 that, oh, no, there's no problem. I think we have
4 should have outside independent audits done. And
5 that's how we stop the fraud by transparency, by
6 just showing us the machines to make sure they don't
7 have the technology in them that can be accessed
8 through the internet, or through -- you don't even
9 have to connection to the internet in order to
10 manipulate the data on it. But Dominion won't even
11 let us do that or the State of New Mexico.

12 **Q Would you put up Exhibit 13 please, Chris.**
13 **You've seen this tweet before, Mr. Griffin?**

14 **(Deposition Exhibit No. 13 marked.)**

15 A No, I don't recall it.

16 **Q You don't recall ever seeing this before?**
17 **Do you know --**

18 A No, I saw that earlier when you all were
19 scrolling down through the deal, and I don't
20 remember, no, I don't remember seeing that tweet.
21 Can you blow it up a little bit.

22 **Q The tweet is, I hope Trump can win without**
23 **war.**

24 **You see that?**

25 A Yeah.

1 Q Do you know whether you tweeted that, or
2 **Mr. Struck** tweeted it?

3 A No. I've never seen that tweet before.

4 Q So you you know that it was not you?

5 A Yeah, unless --

6 Q And you remember that because you would
7 **never say anything about a war being involved?**

8 A I've already told you there is a war going
9 on right now. It's a spiritual war. So I do
10 believe there's a war going on right now. But I
11 don't recall this tweet.

12 Q But you do recall that it wasn't you that
13 **put this tweet on?**

14 A I don't recall this tweet. I don't
15 recollect this tweet.

16 Q **One way or the other?**

17 A No. Yeah, one way or the other. However
18 you want to interpret that. I don't remember tweet
19 -- I didn't tweet this.

20 Q **Great. Let's put up number 14, please.**

21 **(Deposition Exhibit No. 14 marked.)**

22 A Did you find that in my dumpster or Matt's
23 as you're dumpster diving?

24 Q **You don't get to ask the questions, I've**
25 **told you that. I ask the questions, you give the**

1 **answers. Okay. Do you remember this tweet?**

2 A Yeah, I'd rather stand on the patriot aisle
3 than the toilet paper aisle. Yeah, I probably did
4 but you know --

5 **Q That's your tweet, isn't it?**

6 A Yeah, and I will say that we're having the
7 civil war right now. But it's spiritual war. It's
8 not a physical war. It's a spiritual war.

9 **Q So that's what you meant when you posted**
10 **this tweet, that we're having a spiritual war?**

11 A I'd imagine.

12 MR. GOLDBERG: All right. Let's take a
13 break.

14 THE WITNESS: Maybe it was an April fool's
15 joke. It's on April 1st.

16 **Q (BY MR. GOLDBERG) It is on April fools,**
17 **maybe it's an April fool's joke. Is that what it is?**

18 A No. I'm just kidding.

19 **Q So you're kidding now. You weren't kidding**
20 **then, right? You were telling the truth then,**
21 **right?**

22 A Yeah, that we're having a spiritual war.
23 Absolutely.

24 **Q No. You said you may wind up having a**
25 **civil war, which --**

1 A I believe we're having a civil war right
2 now. But it's exactly that, it's civil. Civil war.
3 Exactly what this post says. It's civil. It's not
4 violent. It's not aggressive. It's civil. It's a
5 civil war. And notice the parenthesis around it.

6 MR. GOLDBERG: Let's take a break.

7 (Deposition recessed from 3:17 to 3:30.)

8 **Q (BY MR. GOLDBERG) In any of the speeches**
9 **that you gave on the way to Washington D.C. for the**
10 **January 6 Stop the Steal rally, did you ever talk to**
11 **any of the people that you were giving speeches to?**
12 **Did you ever mention the use of violence at the**
13 **rally or violence to help Stop the Steal?**

14 A No, sir. No, sir.

15 **Q Chris, would you put Exhibit 9 back up and**
16 **go to page 35, please.**

17 **Can you see this tweet?**

18 A I do.

19 **Q Did you put this tweet up?**

20 A I'm sure I probably did. And, again, I
21 just want to state that we're in a fight. It's a
22 political fight. That's not to promote violence.
23 That's not a violent statement. I mean, we fight
24 every day for a political position and, you know,
25 for our platform.

1 Q Did you put this tweet up after you came
2 back from the January 6th Stop the Steal rally?

3 A I'm not sure. It doesn't say. I can't see
4 when it was posted.

5 Q It doesn't say, that's why I'm asking.

6 A Yeah, I don't know.

7 Q You mentioned in your previous testimony
8 that you disagreed with the tweets that you said you
9 didn't put up that talked about war. Did you ever
10 instruct Mr. Struck to take any tweets down from the
11 tweets that had been tweeted on the Cowboy for Trump
12 tweet account?

13 A Not that I recall.

14 Q So if you saw a tweet that you didn't
15 approve of, would you have told Mr. Struck to take
16 the tweet down?

17 A No. I don't believe so, because I can
18 usually stand behind and give an account for every
19 statement and every tweet that I post. I feel like
20 I've done that with you today. I mean, I'm not,
21 yeah. I'm an open book. I don't try to hide
22 things. I don't try to delete things. I don't try
23 to cover things up. I'll give you an answer for for
24 any answer you ask -- or for any question you ask.

25 Q Well, let's go back then to the events

1 **January 6th. You're in Washington D.C. early in the**
2 **morning on January 6th, correct?**

3 A Correct.

4 Q **And you are out where the rally was going**
5 **to be with Mr. Struck, correct?**

6 A Correct.

7 Q **And he took videos of you then, correct?**

8 A Correct.

9 MR. GOLDBERG: Would you bring up
10 Exhibit 15, which is a video-recording. Go ahead
11 and play it please, Chris. Do you have the sound on
12 it, Chris?

13 (Deposition Exhibit No. 15 marked.)

14 MR. DODD: From the beginning?

15 MR. GOLDBERG: Yeah, start at the beginning
16 again, please. Okay. Well, we're having trouble
17 with the sound, but go ahead.

18 (Video being played.)

19 MR. GOLDBERG: Stop it. Thank you. If you
20 back it up just a little bit, Chris. Okay.

21 Q **(BY MR. GOLDBERG) That's you, is it not?**

22 A That's correct.

23 Q **Okay. Great. And that was your voice that**
24 **we heard saying good morning to you, correct?**

25 A I believe so.

1 MR. GOLDBERG: Okay. Great. Please
2 continue, Chris.

3 (Video continued being played.)

4 Stop it.

5 Q (BY MR. GOLDBERG) Did you hear that
6 statement by you, Mr. Griffin, where you asked that
7 fellow in the drum major outfit, where's your gun
8 at?

9 A Yes, sir, I did. It's because he's dressed
10 up like a toy soldier and the only thing that he's
11 missing as a toy soldier is his gun.

12 Q Is that why he should have a gun?

13 A That's why I asked him that, because he
14 looks like a toy soldier and every toy soldier has
15 guns.

16 MR. GOLDBERG: Would you go back to about
17 one minute and 15 seconds, please Chris. Go ahead
18 and play it and turn the sound up.

19 (Video was played.)

20 Q (BY MR. GOLDBERG) Did you hear that?

21 Stop it.

22 Did you hear that person say, "Storm the
23 Capitol?"

24 A No, I didn't.

25 Q When you were in Washington on January 6th,

1 **did you ever hear anybody talk talking about**
2 **storming the Capitol?**

3 A No, sir. Not that I recall.

4 MR. GOLDBERG: Would you put up Exhibit 16,
5 please, Chris. No. Before we do that, I'm sorry.
6 Would you put 15 up, again.

7 Q **(BY MR. GOLDBERG) Okay. This video that**
8 **we've just been reviewing that's Exhibit 15, is a**
9 **video that Mr. Struck took, correct?**

10 A I'm not sure. Possibly.

11 Q **What doubt do you have about whether this**
12 **is a video that Mr. Struck took?**

13 A Because I don't know who's holding the
14 camera right here. How do I know if this is Struck
15 holding the video camera?

16 Q **Are you testifying here under oath --**

17 A Absolutely.

18 Q **Let me finish my question. Are you**
19 **testifying here under oath that you don't recollect**
20 **that Mr. Struck videoed you at this time in the**
21 **early morning? Is that your testimony?**

22 A I don't know who's taking the video because
23 how am I supposed to -- I am under oath, and I don't
24 want to lie to you. And I can't see Matt holding
25 the video camera. I don't know who's taking this

1 video.

2 Q Well, you testified already that Matt was
3 videoing you consistently during this. So --

4 A Does that mean that he's holding the camera
5 at this instant?

6 Q Is there anything about this video that is
7 in error that you can see?

8 A Yeah, I don't know. I don't know how to
9 answer that question. If there's anything in error?

10 Q Yeah, do you see anything in there that
11 disagrees with your memory?

12 A Other than the sound quality is extremely
13 poor, and I can't hardly hear it. Other than that,
14 no.

15 Q Okay. Thank you. Now put up 16 please,
16 Chris.

17 All right. Before we play it, do you
18 remember this video?

19 (Deposition Exhibit No. 16 marked.)

20 A I remember this scene, yeah.

21 Q When was this video taken?

22 A I'm not sure. Probably on January the 5th,
23 I would imagine.

24 Q Is that the Cadillac Escalade?

25 A That's correct.

1 **Q That's what you and Mr. Struck travel**
2 **through?**

3 A That's correct.

4 **Q Traveled in when you went to Washington?**

5 A That's correct.

6 **Q Whose Escalade is that?**

7 A It's Enterprise Rental Car. That's the
8 only car that we could rent at the Enterprise
9 dealership without having a put a mask on.

10 **Q And did you paint it?**

11 A No. That's vinyl.

12 MR. GOLDBERG: Okay. Great. Go ahead and
13 play Exhibit 16.

14 (Video being played.)

15 MR. GOLDBERG: Stop it, please, Chris.

16 **Q (BY MR. GOLDBERG) Why did you believe this**
17 **was going to be the most historic day in your**
18 **lifetime?**

19 A Because I felt like it was going to be one
20 of the largest, peaceful protests we have already
21 seen in our country. Which it was.

22 **Q Why did you think that?**

23 A Just because I knew that there was a lot of
24 people like myself that are concerned about election
25 integrity as we should have been and still should

1 be.

2 Q So a lot of people were going to come to
3 Washington to express their views about the stealing
4 of the election?

5 A Peacefully protest.

6 MR. GOLDBERG: All right. Go ahead.

7 Please.

8 (Video continued being played.)

9 MR. GOLDBERG: Stop it, please.

10 Q (BY MR. GOLDBERG) What did you mean by the
11 right choice?

12 A I guess, to stand up for election integrity
13 and peacefully protest.

14 Q So we're going to make the right choice by
15 -- what you meant was to protest peacefully?

16 A Well, yeah, and possibly the certification
17 of the elections too. I still think there was
18 enough fraud that was evident that it shouldn't have
19 been certified. It should have gone back to the
20 states legally. Everything legally.

21 Q Is that the choice that you were
22 identifying as the right choice --

23 A The choice was to look closer at our
24 elector.

25 Q Let me finish the question. Was the choice

1 that you were referring to in the video, the choice
2 of stopping the certification of the fraudulent
3 election and sending it back to the states?

4 A By legal recourse.

5 Q Okay. I take that as an affirmative answer
6 to my question.

7 A To legally question the elector, yes.

8 MR. GOLDBERG: Go ahead, Chris.

9 (Video continued being played.)

10 Stop it again.

11 Q (BY MR. GOLDBERG) You stated there, you
12 have Mike Pence in your prayers. We're praying for
13 you, Mike. You remember saying that?

14 A Absolutely. And I still pray for him.

15 Q Okay. Great. Who are you speaking to when
16 you're speaking to this video?

17 A Matt.

18 Q Oh, he was taking this video?

19 A I was just exercising my freedom of
20 expression.

21 Q I asked a different question.

22 A What was it?

23 Q Mr. Struck was taking this video?

24 A That's correct.

25 Q Because you remember him taking this video?

1 A Yeah.

2 Q You remember this video being taken on
3 January 5th, but you don't remember Mr. Struck
4 taking the video the day later, which was
5 Exhibit 15?

6 A I particular remember this instant. I
7 don't remember the other instant that where we were
8 walking down the line so. . .

9 Q Okay. All I want is your testimony, your
10 truthful testimony.

11 A Yeah, and that's what I'm giving you.

12 Q Great. So you said you were praying for
13 Vice President Pence. Who is we when you say we are
14 praying for you?

15 A Probably many others like me.

16 Q And why were you praying for him Vice
17 President Pence?

18 A For him to have the strength and the
19 boldness and the courage to do do the right thing.
20 And I believe at that time, the right thing was to
21 not certify the election and role it back to the
22 states, so we could look at it closer.

23 MR. GOLDBERG: Okay. Great. Thank you.
24 Go ahead and play it to the end, Chris.

25 (Video continued being played.)

1 Q (BY MR. GOLDBERG) Okay. So is this video
2 an accurate portrayal of what you were saying at
3 this time in January 5th in Washington D.C.?

4 A Sure.

5 Q Would you put up Exhibit 17, please? I'm
6 showing you Exhibit 17. Do you recollect this video
7 being taken by Mr. Struck?

8 (Deposition Exhibit No. 17 marked.)

9 A No, I don't recall.

10 MR. GOLDBERG: Let's play the video, Chris.

11 (Video being played.)

12 Stop it, please.

13 Q (BY MR. GOLDBERG) Do you recognize your
14 voice as saying, I'm Couy Griffin?

15 A I do.

16 Q And do you recognize that's Mr. Struck's
17 voice?

18 A No. I didn't hear.

19 MR. GOLDBERG: You didn't hear. Play it
20 back, Chris. Start it now.

21 (Video continued being played.)

22 Stop it.

23 Q (BY MR. GOLDBERG) Did you hear that?

24 A Yeah, I did.

25 Q Is that Mr. Struck's voice?

1 A It sounded like it.

2 Q **Does it refresh your recollection that**
3 **Mr. Struck is holding the camera, and he's making**
4 **this video?**

5 A Yeah, I would say that he is.

6 MR. GOLDBERG: All right. Great. Go
7 ahead. Please continue to play the video.

8 (Video continued being played.)

9 Stop the video.

10 Q **(BY MR. GOLDBERG) That's you, is it not,**
11 **in the video?**

12 A It is. Yes, sir.

13 MR. GOLDBERG: Go ahead, Chris.

14 (Video continued being played.)

15 Okay. You can stop it.

16 Q **(BY MR. GOLDBERG) So, Mr. Griffin, this**
17 **video is taken on January 6th. You see that, don't**
18 **you, up in the upper right-hand?**

19 A I did.

20 Q **From your memory, that's approximately when**
21 **this video was taken, correct?**

22 A Sure.

23 Q **And it's at 1:45 p.m. in the afternoon.**
24 **And this is after you had left the Ellipse and were**
25 **going with the crowd towards the Capitol, correct?**

1 A Correct.

2 MR. GOLDBERG: Would you put up Exhibit 18
3 please, Chris.

4 MR. DODD: I'm going to try something here
5 to hopefully make the audio better.

6 MR. GOLDBERG: That will make Mr. Griffin
7 and me happy.

8 MR. DODD: Just bear with me for a moment.

9 MR. GOLDBERG: We're bearing with you.
10 We're at your mercy.

11 **Q (BY MR. GOLDBERG) So before we start the**
12 **video, do you remember this video being taken by**
13 **Mr. Struck?**

14 MR. DODD: Would you like me to play it?

15 MR. GOLDBERG: Not yet.

16 THE WITNESS: No, I don't remember it being
17 taken by --

18 **Q (BY MR. GOLDBERG) Do you notice in the**
19 **upper right-hand corner it has the exact same type**
20 **of legend as this video was taken by Mr. Struck? Do**
21 **you remember that, do you see that?**

22 A Yeah, I don't know if he's the one taking
23 the video of it.

24 MR. GOLDBERG: Okay. Great. Go ahead.
25 We'll play the video.

1 (Deposition Exhibit No. 18 marked.)

2 MR. DODD: It gets weird when I do that for
3 some reason. I can't hear you guys when I try to
4 share the video, so we'll have to just do it the old
5 way. I apologize.

6 MR. GOLDBERG: Okay. Great.

7 MR. DODD: Would you like me to play it,
8 Joe?

9 MR. GOLDBERG: Yes, I would like you to
10 play it.

11 (Video being played.)

12 So we got no sounds that time.

13 MR. DODD: Okay. Let me replay it.

14 (Video continued being played.)

15 MR. DODD: Can you hear it?

16 MR. GOLDBERG: No.

17 MR. DODD: Okay. Give me a moment.

18 (Video continued being played.)

19 MR. GOLDBERG: Okay. Stop it.

20 MR. DODD: Did you hear it that time?

21 MR. GOLDBERG: No, we did not, but that's
22 okay.

23 Q (BY MR. GOLDBERG) You saw the video,
24 Mr. Griffin, that was you in the video, was it not?
25 Mr. Griffin, are you there?

1 A Yeah.

2 Q There you go. Mr. Griffin, that's you in
3 the video, correct? Mr. Griffin, can you hear me?
4 That's you in the video, is it not?

5 A Yeah, I can hear you.

6 Q Is it you that's in the video right there?

7 MR. DODD: Chris, take the exhibit down.

8 Q (BY MR. GOLDBERG) Can you hear me,
9 Mr. Griffin? This is definitely a bandwidth problem
10 now. There you go. Are you there, Mr. Griffin?

11 A Yeah.

12 Q All right. You're actually orienting
13 incorrect. Can you turn your phone?

14 A Your voice is real muffled. I can't hardly
15 hear you.

16 Q Well we have a problem then, don't we? So
17 let me ask you. Do you want to try to continue this
18 deposition or should we -- are you there, Mr.
19 Griffin?

20 A Yeah, I can hear you.

21 Q You can hear me now. I'll tell you that
22 you're oriented now, so that it look like you're
23 standing on your sideways. You're horizontal rather
24 than vertical. I don't know whether you want to --

25 A I can't see you at all on my side.

1 Q You can't see me at all?

2 A No. Now I can. There you are.

3 Q Can you hear me all right?

4 A I can hear you okay.

5 Q Okay. Great. I don't have to go through
6 the alternatives. So you saw that video. That was
7 you in the video, wasn't it?

8 A Yes, sir.

9 Q And that video was taken on January 6th in
10 the afternoon in front of -- with the Capitol in the
11 background, correct?

12 A It looked like it. Yes, sir.

13 Q And that video was an accurate depiction of
14 what it was showing, correct?

15 A From the little bitty clip that I saw,
16 yeah.

17 Q Yeah, but the little bitty clip was
18 accurate. That's all I'm asking you. I'm not
19 asking if it was anything else was accurate, just
20 the little bitty clip that you saw was accurate?

21 A Sure. Sure. Sure.

22 MR. GOLDBERG: Great. Would you put up
23 Exhibit 19, Chris?

24 (Deposition Exhibit No. 19 marked.)

25 Q (BY MR. GOLDBERG) Okay. Before we start

1 it, do you remember this video, Mr. Griffin?

2 A No, I don't remember it.

3 Q Do you know whether this is a video --
4 before we watch it. Do you know whether this is a
5 video that Mr. Struck took?

6 A No, I don't know that.

7 Q And the fact that it has the same legend at
8 the top, this one, again, saying January 6,
9 2:38 p.m., that doesn't refresh your recollection
10 that Mr. Struck was taking this video?

11 A No. How would that tell me if Matt's
12 holding the camera because there's some letters at
13 the top of the screen.

14 Q All I'm doing is asking the questions --

15 A I know. And all I'm telling you is I don't
16 know.

17 MR. GOLDBERG: Your answer is, no, it
18 doesn't refresh your recollection.

19 Let's play the video and see if that helps,
20 thanks Chris.

21 (Video continued being played.)

22 Stop it for a second.

23 Q (BY MR. GOLDBERG) Is that you in the video
24 right here?

25 A It is.

1 Q Did you hear them chanting?

2 A I heard them chanting USA.

3 Q Okay. Great.

4 A Looks like a very peaceful crowd.

5 Q I didn't ask that. That's okay. That's
6 your editorial. Let's go on.

7 (Video continued being played.)

8 So as you saw that video, Mr. Griffin, was
9 that video an accurate depiction of what was going
10 on, what it was representing in the video?

11 A Yes. It looks very peaceful to me. It
12 look like a very peaceful patriotic protest, so
13 yeah.

14 Q Do you remember in that video talking about
15 that people better worry about whether the people in
16 the crowd were carrying guns?

17 A No. There was never any concern at any
18 point during that day of anybody carrying a firearm.

19 Q You never said anything like that, did you?

20 A Not that I recall, no, but I say a lot of
21 things out of jest. I talk a lot. Who knows. But
22 I don't remember saying anything of the sorts.

23 Q All right. When you went to Washington
24 D.C. starting two or three days or four days ahead
25 of time and got there on January 5th or January 6th,

1 did you bring any guns with you?

2 A Did I bring any guns with me?

3 Q Yes, sir. Did you bring any guns --

4 A Is it legal to travel with firearms in the
5 United States?

6 Q One, I'm not your lawyer. And, two, as I
7 said to you many times --

8 A Well, then I'll just plead the Fifth.

9 Q Let me finish.

10 A Okay.

11 Q I get to ask the questions. Let me finish.
12 I get to ask the questions, you answer the
13 questions. So I'll ask the question again. When
14 you went to Washington D.C. for the January 6th
15 rally, did you bring any gun was you?

16 A I'll plead the Fifth.

17 Q You'll plead the Fifth?

18 A Uh-huh.

19 Q Did Mr. Struck bring any guns with him?

20 A I'll plead the Fifth.

21 Q Did you have guns in your Cadillac
22 Escalade?

23 A I believe that we still have the right to
24 protect ourselves and the right to our Second
25 Amendment and the right to bear arms. So in saying

1 all of that, I will plead the Fifth.

2 Q Did you intend to use the guns?

3 A Absolutely not.

4 Q You're not taking the Fifth on that?

5 A No. I didn't have any intention of using
6 any guns. I'm not saying that I had guns with me.
7 I'm just saying that I didn't have any intention of
8 using any firearms.

9 MR. GOLDBERG: Would you put up Exhibit 19
10 please. Was that 19, Chris?

11 MR. DODD: Yes.

12 MR. GOLDBERG: Okay. Would you put up
13 Exhibit 20 please, Chris.

14 (Deposition Exhibit No. 20 marked and
15 played.)

16 Okay. Stop it again, Chris.

17 Q (BY MR. GOLDBERG) Again, that's you,
18 Mr. Griffin, is it not, in the cowboy hat?

19 A It looks like me. Yes, sir.

20 Q There may have been other people -- is that
21 a Stetson by the way?

22 A No. It's a custom-built hat.

23 Q So there may have been other people wearing
24 black cowboy hats there, but there probably weren't
25 all that many.

1 So continue to play it and see if we can
2 **help Mr. Griffin out.**

3 **That's you isn't it, Mr. Griffin?**

4 A It is.

5 Q **And is this a video that Mr. Struck took?**

6 A I don't know. I would imagine so.

7 MR. GOLDBERG: Okay. Go ahead. Continue
8 please.

9 (Video continued being played.)

10 Will you go back about 15 seconds. All
11 right. Go ahead. Start it again.

12 (Video continued being played.)

13 Okay. Stop.

14 Q **(BY MR. GOLDBERG) That's you, is it not,**
15 **Mr. Griffin?**

16 A Yeah, that's correct.

17 Q **Going up. You're going past the barricade**
18 **that was erected there to stop people, correct?**

19 A No. You're wrong.

20 Q **I'm wrong. Okay.**

21 A Those weren't put there to stop people.
22 Those were steps.

23 Q **Those are steps?**

24 A They were being used as steps.

25 Q **Those are steps. So this is your defense**

1 here is that you understood that those were put
2 there so that you could get over that wall and get
3 into the Capitol? Is that your defense?

4 A No, I never went into the Capitol. Those
5 are being used for steps on Capitol grounds.

6 MR. GOLDBERG: Okay. Go ahead, Chris, go
7 ahead.

8 (Video continued being played.)

9 Stop it for a second.

10 Q (BY MR. GOLDBERG) Do you remember the
11 crowd chanting here stop the steal?

12 A I don't know if I remember them chanting,
13 stop the steal. Possibly.

14 Q Do you remember the crowd chanting, storm
15 the Capitol here?

16 A I don't remember, no, but I know that I
17 wasn't chanting stop the steal. I know that I
18 wasn't chanting storm the Capitol.

19 Q That's not what I asked --

20 A I know, but that's what I'm -- I don't
21 know. I know that I wasn't chanting it.

22 MR. GOLDBERG: Okay. Please go ahead.

23 (Video continued being played.)

24 Stop it please, Chris.

25 Q (BY MR. GOLDBERG) What did you mean --

1 **that was you saying this is our House, correct?**

2 A That's right.

3 **Q What were you seeking to convey when you**
4 **said that?**

5 A Just exactly what I said. It is our House.
6 It's the peoples' House. And if you notice, I have
7 a smile on my face and it's all peaceful.

8 **Q So what you're seeing here, this vision**
9 **that you and I are both looking at here.**

10 A Uh-huh.

11 **Q You're saying you see this as a peaceful**
12 **event?**

13 A Absolutely, it was. You can see by me
14 smiling and laughing and it was peaceful all around
15 me. And whenever I said this is our House, I felt
16 like I was totally well within my rights to be there
17 because I thought that those grounds did belong to
18 the people.

19 **Q So does that -- in saying that this is our**
20 **House and you have a right to be there, were you**
21 **also encouraging the people around you that they had**
22 **a right to be there?**

23 A No. I would just stating my own opinion
24 and my own position. And I do feel like we have the
25 right to be on those grounds. That is our House.

1 That is the peoples' House.

2 Q Why did you say that at all if you weren't
3 seeking to encourage people to be there and to
4 continue on? Why did you say it --

5 A I don't know. Maybe I was just freely
6 expressing myself at the time like we should be able
7 to have the right to do.

8 Q Isn't it true, Mr. Griffin, that you were
9 saying that because you were encouraging people to
10 be where they shouldn't be, and you were encouraging
11 them to storm the Capitol and go into the house?

12 A No. Absolutely not, because again I didn't
13 feel like I was breaking the law at that time. I
14 didn't feel like -- I didn't feel like I was
15 trespassing or doing anything illegal at that time.
16 If I felt like I was breaking the law, I wouldn't
17 have been there, and I sure wouldn't have had a
18 video camera on me.

19 MR. GOLDBERG: Go ahead.

20 (Video continued being played.)

21 Will you stop it please, Chris. Chris, go
22 back about 10, 15 seconds.

23 Q (BY MR. GOLDBERG) Do you see that pink
24 smoke coming up in the background there?

25 A I do.

1 **Q What did you understand that to be?**

2 A I didn't know what -- I didn't know what it
3 was. I thought make a smoke bomb or something, I
4 guess. I didn't know what it was.

5 **Q Did you smell anything?**

6 A No, not at all. I didn't smell -- I didn't
7 smell tear gas or anything of the sort.

8 MR. GOLDBERG: Go ahead.

9 (Video continued being played.)

10 Stop it please, Chris. Would you go back
11 about 15 seconds. Right there, just leave it.

12 **Q (BY MR. GOLDBERG) You see that barricade**
13 **there, that white barricade?**

14 A No. I see something. It doesn't look like
15 a barricade.

16 **Q What does that look like to you?**

17 A I don't know.

18 **Q Do you think that was an invitation to go**
19 **further?**

20 A I don't know what it is. If that's what
21 the Capitol police called the handicap ground during
22 my trial, maybe that's what you're referring to.
23 But I'll have you know, on record, during my trial
24 in Washington D.C., the D.C. Capitol police called
25 about a handicap ground.

1 **Q You crossed over that, did you not?**

2 A I believe I went up a handicapped ground.

3 **Q You went over, whatever that white wall is**
4 **there, you went over that, correct?**

5 A Yeah, it's what the D.C. Capitol police
6 called the handicap ramp in my trial.

7 MR. GOLDBERG: Go ahead.

8 (Video continued being played.)

9 So is that video that seven-minute,
10 several-second video an accurate representation of
11 what it is depicting?

12 A Well, it very much looks very peaceful. As
13 I can see I'm smiling the whole time and interacting
14 the people and everybody is peaceful all around, so
15 I think it would be a very accurate depiction of a
16 peaceful protest.

17 **Q Do you remember during this time when you**
18 **were approaching the Capitol outside of the Capitol**
19 **here, saying to one of the people next to you, that**
20 **they can be glad that we all aren't armed?**

21 A I don't remember that. Huh-uh.

22 **Q Would you have said something like that?**

23 A Well, we weren't all armed, so I don't
24 know. Maybe, yeah, I could have possibly said that
25 because they should be glad that everybody there

1 wasn't armed. And they should be very happy that it
2 wasn't an armed insurrection.

3 Q Would you put up Exhibit 21, please.

4 Before we start it, you remember this
5 video being taken, don't you, Mr. Griffin?

6 (Deposition Exhibit No. 21 marked.)

7 A I do.

8 Q This is a video where you are -- you took a
9 bullhorn, correct?

10 A Where I pray with people. That's right.

11 Q And Mr. Struck took this video?

12 A Yes, sir.

13 Q And you remember this one, but you don't
14 remember Mr. Struck taking the other ones. Why?

15 A Because I can recollect at the time Matt
16 holding the camera, and I can recollect this event.
17 I can't recollect the other one, that's why.

18 Q What is all that smoke that is going over
19 the crowd? Do you have any understanding of what
20 that is?

21 A No, I didn't. I thought it just was -- I
22 mean, there's flags -- there's -- I just thought it
23 was -- I mean, it was red. There's red and blue and
24 I thought it was just all part of the celebration.

25 MR. GOLDBERG: This is part of the

1 celebration. Okay. Go ahead. Let's play the
2 video, Chris.

3 (Video continued being played.)

4 Stop it.

5 Q (BY MR. GOLDBERG) You can actually hear
6 something there. You said, "We aren't going
7 anywhere." Why did you say that?

8 A Because we were peacefully protesting.

9 Q Did you understand that somebody wanted you
10 to go somewhere else?

11 A No, not at all. We were making a stand.
12 That's what you do when you peacefully protest, you
13 stand and protest and you say, we're not going
14 anywhere.

15 Q Why was there a need to tell people that
16 you weren't going anywhere then?

17 A I guess because I freely expressing myself.

18 Q Any other reason?

19 A No.

20 MR. GOLDBERG: Okay. Go ahead.

21 (Video continued being played.)

22 Stop it for a second, Chris.

23 Q (BY MR. GOLDBERG) Do you remember saying
24 during this video anything to get our country back?

25 A Possibly. I could have said that. You

1 know, I mean, peacefully.

2 **Q What did you mean when you said, anything**
3 **to get our country back?**

4 A Anything to peacefully protest, anything
5 peaceful. That's not a violent statement. And as
6 you can see in the video is me smiling the whole
7 time and laughing and smiling. There wasn't
8 anything aggressive going on. There was nothing
9 disruptive going on. It was -- in my area it was
10 always peaceful. I mean, you've dug through
11 everything. You can see it's always peaceful in my
12 area. If there would have been anything violent or
13 aggressive, I would have left.

14 **Q As you look out -- right at this very scene**
15 **right here, what you see is a peaceful protest?**

16 A Absolutely.

17 MR. GOLDBERG: Go ahead. Continue please,
18 Chris.

19 (Video continued being played.)

20 Stop here, please. Can you go back about
21 40 seconds?

22 MR. DODD: Joe, just to make it easier, I
23 just have to be able to see your mouth when you say
24 to stop it. Because that's how I know.

25 MR. GOLDBERG: I'm sorry.

1 MR. DODD: It's okay. Play it?

2 MR. GOLDBERG: Yes, please. I think you
3 had it on slow motion.

4 MR. DODD: It must be coming through that
5 way.

6 MR. GOLDBERG: Okay. Go ahead.

7 (Video continued being played.)

8 Q (BY MR. GOLDBERG) So is this Exhibit 20 an
9 accurate depiction of the events that it was
10 showing?

11 A It looks very peaceful to me. So, yeah, it
12 looks like a peaceful protest where there wasn't any
13 violence or aggression. So, yeah, I would say.

14 MR. GOLDBERG: Great.

15 Would you put up Exhibit 22, please, Chris.

16 (Deposition Exhibit No. 22 marked.)

17 Q (BY MR. GOLDBERG) So is this another video
18 taken by Mr. Struck that afternoon on January 6th?

19 A I don't know. I can't tell.

20 MR. GOLDBERG: This one you can't tell.
21 Okay.

22 Go ahead. Let's play it.

23 (Video being played.)

24 Q (BY MR. GOLDBERG) So is Exhibit 22 an
25 accurate depiction of the 48 seconds or so that is

1 **shown on this video?**

2 A I don't know. It's just skipping.

3 **Q You're just guessing. Is there anything in**
4 **there that you see that is inconsistent with your**
5 **recollections we mentioned?**

6 A No. It looks consistently peaceful.
7 There's no -- I don't see anything violent. I don't
8 see anything aggressive.

9 MR. GOLDBERG: Okay. Great. Let's turn to
10 23, please Chris.

11 (Deposition Exhibit No. 23 marked.)

12 **Q (BY MR. GOLDBERG) That's you, is it not?**

13 A That's correct.

14 **Q Did Mr. Struck take this video?**

15 A I would assume. I don't know. I don't see
16 him holding the camera.

17 **Q Why do you assume that this is one that he**
18 **took as opposed to not knowing with respect to the**
19 **others?**

20 A Because there's cameras everywhere, and
21 there's people filming all directions. And I'm
22 under oath right now, and I don't want to speak on
23 something that I'm not absolutely 100 percent sure
24 of.

25 MR. GOLDBERG: Let's play the video,

1 Exhibit 23.

2 (Video being played.)

3 Stop it, please.

4 **Q (BY MR. GOLDBERG) That was you saying that**
5 **you watched the ruckus up there. Do you remember**
6 **saying that?**

7 A Yeah, I don't know what I exactly I was
8 referring to. But now, if I said it I said it.

9 **Q What does ruckus mean to you?**

10 A Ruckus could be a lot of things. A ruckus
11 could be what we're having right here whenever we
12 disagree. I mean, a ruckus is a disagreement.

13 **Q Is a ruckus is a peaceful protest?**

14 A Yeah, sure. A ruckus is a disagreement. A
15 ruckus is something you don't agree with but just
16 because it's a ruckus doesn't mean that it's violent
17 or disorderly or disruptive. I mean, if my actions
18 were disorderly or disruptive, then Judge Trevor
19 McFadden would have found me guilty for disruptive
20 and disorderly behavior. But the government
21 couldn't prove that I did anything on that day that
22 was disruptive or disorderly.

23 **Q Do you remember this video being taken by**
24 **Mr. Struck?**

25 A I don't necessarily remember it, no.

1 MR. GOLDBERG: Okay. Go ahead. Please
2 continue to play, Chris.

3 (Video continued being played.)

4 Stop it, please.

5 Q (BY MR. GOLDBERG) When you say, "We hope
6 we got their attention." Who's the they that you're
7 talking about?

8 A The, you know, the powers that I believe
9 that are manipulating things, and, you know, we hope
10 we got their attention through a peaceful protest.
11 That's what you do whenever you gather for a
12 peaceful protest. You want to get peoples'
13 attention.

14 Q Who's the we?

15 A Everybody that was there that was gathered
16 peacefully.

17 Q And did you include yourself in the we?

18 A I was gathered there peacefully, so
19 absolutely.

20 Q So you viewed -- you were telling the
21 camera that you were part of this group that was
22 doing what you characterized just now as --

23 A As a peaceful protect.

24 Q Let me finish. As capturing their
25 attention, correct?

1 A Yeah, or maybe I was just referring to
2 Matt. He's who I was talking to.

3 MR. GOLDBERG: All right. Go ahead.

4 (Video continued being played.)

5 **Q (BY MR. GOLDBERG) So is this video an**
6 **accurate depiction of what's being represented?**

7 A A peaceful protest, yes.

8 MR. GOLDBERG: Let's go to Exhibit 24
9 please, Chris.

10 (Deposition Exhibit No. 24 marked.)

11 THE WITNESS: I mean, I don't see anything
12 violent going on around me, unless you see something
13 something I don't see.

14 MR. GOLDBERG: Right now I'm not under
15 oath. All I'm asking you what --

16 THE WITNESS: I don't see any police
17 officers telling me to leave.

18 MR. GOLDBERG: Go ahead.

19 (Video being played.)

20 Will you stop it, please.

21 **Q (BY MR. GOLDBERG) That's you in the video?**

22 A That's correct.

23 **Q And that's Mr. Struck taking the video?**

24 A That's correct.

25 MR. GOLDBERG: Go ahead.

1 (Video continued being played.)

2 Stop it, again.

3 Q (BY MR. GOLDBERG) This is the day after
4 the January 6th Stop the Steal event?

5 A Correct.

6 MR. GOLDBERG: Go ahead.

7 (Video continued being played.)

8 Q (BY MR. GOLDBERG) This video accurately
9 depicts what you were saying in Roanoke, correct?

10 A It accurately depicts the day after we
11 found out that Ashli Babbitt, an unarmed veteran was
12 shot and killed inside the Capitol, so it was
13 emotionally driven but not violent in any way.

14 Q Okay. Great.

15 Would you put you will Exhibit 25. Please.

16 (Deposition Exhibit No. 25 marked.)

17 This is a video -- the county commission
18 meetings are streamed, are they not? The Otero
19 County Commissions are streamed?

20 A That's correct.

21 Q And this is a video of the county
22 commission meeting on January 14, 2021, correct?

23 A That's correct.

24 Q You've seen this video before?

25 A I remember it, uh-huh.

1 **Q This video is an accurate depiction of this**
2 **part of the meeting, correct?**

3 A That's correct.

4 MR. GOLDBERG: Okay. Thank you. Would you
5 put up Exhibit 26 please, Chris.

6 (Deposition Exhibit No. 26 marked.)

7 You remember this video, don't you
8 Mr. Griffin.

9 A Just one second, please. Okay.

10 **Q You remember this video don't you,**
11 **Mr. Griffin?**

12 A No. I can't say that you do.

13 MR. GOLDBERG: Okay. Start playing it
14 please, Chris.

15 (Exhibit 26 being played.)

16 Okay. Stop it.

17 **Q (BY MR. GOLDBERG) Does this refresh your**
18 **recollection?**

19 A It looks like it, uh-huh.

20 **Q Is this a video of Mr. Struck took of you**
21 **all leaving Washington and going back to New Mexico**
22 **through California, correct?**

23 A Yeah, it was on our trip to San Diego where
24 we went out to try and pay our condolences to Ashli
25 Babbitt's family.

1 **Q And this video, again, is taken by**
2 **Mr. Struck of you driving the vehicle and talking is**
3 **an accurate depiction of what is represented?**

4 A Yeah.

5 MR. GOLDBERG: Thank you. Put up
6 Exhibit 28, please.

7 (Deposition Exhibit No. 28 marked.)

8 Go ahead and play it.

9 (Exhibit 28 being played.)

10 **Q (BY MR. GOLDBERG) That's you talking, is**
11 **it not?**

12 A Speaking about a spiritual war that we're
13 under right now, yes.

14 **Q And this is an accurate depiction of you in**
15 **Bowling Green and what you said during this brief**
16 **period of time?**

17 A It's an accurate depiction of me speaking
18 about the spiritual war that's going on in our
19 nation right now.

20 MR. GOLDBERG: Would you put up Exhibit 29
21 please, Chris.

22 (Deposition Exhibit No. 29 marked.)

23 MR. DODD: Would you like me to play it,
24 Joe?

25 MR. GOLDBERG: Yes, please.

1 (Exhibit 29 being played.)

2 Stop for a second.

3 Q (BY MR. GOLDBERG) You've seen this video
4 before over and over again, haven't you Mr. Griffin?

5 A Yes, sir.

6 Q And there's to reason for me to play it.

7 A If I remember right, it's the one where I
8 said, the only good democrat is a dead democrat.
9 And I said specifically that I don't mean that in a
10 physical sense. I only mean that politically, but I
11 can already tell how people are going to make it
12 look like I want to go out and murder all the
13 democrats. If that's the right video where I said
14 that. But you have to play the whole video to get
15 the full scope and to understand what I'm saying.

16 Q If you want, I'll play the whole video. We
17 didn't edit your explanation out.

18 A That's okay. Just as long as that it's
19 clear I didn't mean it in a violent way.

20 Q Again, you've made your record on that, and
21 I'm telling you, we didn't edit it. I'll play it
22 for you if you want.

23 A No. That's fine.

24 Q All I want is that -- this, as you have
25 described it, that is an accurate depiction of what

1 **you said at this time?**

2 A Sure. And the only reason why I say that
3 is for anyone that reviews these videos, so they
4 could know the context in which I said that. And
5 that I didn't mean it in a physical sense. And I
6 can already tell how it's going to be tried to use
7 against me to make me look like I want to go out and
8 murder all the democrats. It's very clear whenever
9 I said it.

10 MR. GOLDBERG: Great. Would you put up
11 Exhibit 30 please, Chris.

12 (Deposition Exhibit No. 30 marked.)

13 Go ahead and play it, Chris.

14 (Exhibit 30 being played.)

15 **Q (BY MR. GOLDBERG) Was that you saying,**
16 **good seeing you?**

17 A I'm not sure. I couldn't tell.

18 **Q Is that you -- keep on playing it.**

19 A That's my hat it looks like.

20 **Q That's your hat, right. Go ahead, Chris,**
21 **please play it.**

22 (Video continued being played.)

23 **That's you saying unbelievable, is it not,**
24 **Mr. Griffin?**

25 A Possibly, but I don't know what I was

1 talking about.

2 MR. GOLDBERG: Go ahead.

3 (Video continued being played.)

4 This was taken on the 6th of January in
5 Washington on the way to the Capitol, correct?

6 A It looks like, I guess. I don't know. It
7 looks like it from the numbers at the top.

8 Q **And it's an accurate depiction of what is**
9 **showing, is it not?**

10 A Apparently.

11 MR. GOLDBERG: Thank you. Would you put up
12 Exhibit 31 please, Chris.

13 (Deposition Exhibit No. 31 marked.)

14 Q **(BY MR. GOLDBERG) Go ahead and play it --**
15 **do you remember this video Mr. Griffin?**

16 A I don't remember it, no.

17 MR. GOLDBERG: Go ahead. Let's play it.

18 (Exhibit 31 being played.)

19 Q **(BY MR. GOLDBERG) Is that you going up the**
20 **stairs there, Mr. Griffin?**

21 A I don't see myself anywhere, but I know
22 those are the stairs.

23 Q **Look at the third person down the**
24 **stairwell. The person with the black coat the tie,**
25 **the shirt that says C4T?**

1 A Oh, yeah, I see myself there. I couldn't
2 see myself before.

3 Q Okay. Great. That's you?

4 A But those are the stairs that I went up
5 that's the outside staircase.

6 Q That's the staircase that you mentioned in
7 your previous testimony, correct?

8 A That's the outside staircase. Yes, sir.

9 Q Is this a video that Mr. Struck took?

10 A It looks, yeah, I believe it is.

11 Q And this is an accurate depiction of what
12 is represented, correct?

13 A Sure.

14 Q And then this is the last video coming up,
15 Mr. Griffin.

16 Would you put up 32, please.

17 (Deposition Exhibit No. 32 marked.)

18 Do you remember this video? Mr. Griffin,
19 do you remember this video?

20 A No.

21 Q Do you remember seeing this scene when you
22 were up there on the terrace?

23 A No.

24 Q Do you have any idea what that woman is
25 doing by the window?

1 A No.

2 MR. GOLDBERG: Okay. Play the video,
3 please.

4 (Exhibit 32 video being played.)

5 Q **(BY MR. GOLDBERG) Do you know whether this**
6 **is a video that was taken by Mr. Struck?**

7 A No. It might have been taken by Ray, I
8 don't know.

9 Q **Is it an accurate depiction of what's being**
10 **represented?**

11 A I don't know what's going on.

12 Q **Is there anything about it that you -- as**
13 **you look at it that looks inaccurate to you?**

14 A It depends on what you're asking me is
15 accurate.

16 Q **Just your memory of what went on that day?**

17 A No. I don't remember it.

18 Q **Okay. Prior to going to Washington D.C.**
19 **on January 6th, did you have any communications with**
20 **the Whitehouse Political Director, Brian Jack?**

21 A No. Not prior to my trip to Washington
22 D.C. I had communications with Brian Jack years,
23 probably two years ago maybe. Brian Jack called me
24 up -- the last time I heard anything from him,
25 President Trump had made a statement on the

1 importance of supporting American farmers and
2 ranchers. And the importance of American B. And
3 Brian Jack called me up and told me, encouraged me
4 to continue doing what I was doing. And that he was
5 calling me under the direction of the United States.

6 **Q Did you have -- so I want to make sure I**
7 **understand correctly. Did you have any discussions**
8 **with Brian Jack about the January 6th?**

9 A Absolutely none.

10 **Q None. Did you have any communications with**
11 **Congresswoman Marjorie Taylor Greene in the days**
12 **preceding January 6th?**

13 A Absolutely none.

14 **Q Did you have any communications with**
15 **Congresswoman Marjorie Taylor Greene about the**
16 **events on January 6th?**

17 A Absolutely none.

18 **Q Do you know who Jake Long is -- Lang is?**

19 A I met Jake Lang on the west side of the
20 Capitol on the day of.

21 **Q He was standing next to you on the west**
22 **terrace of the Capitol for some time, wasn't he?**

23 A That's correct. Jake had been involved in
24 an effort to save people's lives, and he saved two
25 lives on that day and both of these people have

1 signed sworn affidavits and the only reason why
2 they're alive is because Jake Lang pulled them out
3 from underneath piles from being crushed.

4 **Q Did you observe Mr. Lang saving anybody's**
5 **lives?**

6 A I didn't observe them, no, but I know
7 there's sworn affidavits saying that he did.

8 **Q Did you observe Mr. Lange assaulting a**
9 **police officer?**

10 A Absolutely none.

11 MR. GOLDBERG: Great. Let's take a break.

12 (Deposition recessed from 4:54 to 5:04.)

13 **Q (BY MR. GOLDBERG) Mr. Griffin, do you know**
14 **Stewart Rhodes?**

15 A I do know Stewart Rhodes.

16 **Q Who is Stewart Rhodes?**

17 A He's the founder and leader of the Oath
18 Keepers.

19 **Q Did you have any communications with**
20 **Steward Rhodes about January 6th?**

21 A None.

22 **Q Did you have ever have any communications**
23 **with Mr. Rhodes about stopping the steal?**

24 A None.

25 **Q Did you ever have any communications with**

1 **Mr. Rhodes about doing anything about stopping Joe**
2 **Biden from being president?**

3 A None. Not any.

4 MR. GOLDBERG: Thank you. I don't have any
5 more questions. You have the opportunity to review
6 the transcript here and make any corrections if
7 there are any.

8 THE WITNESS: Okay. Well, I guess that's
9 it then. I mean, our world is full the witch hunts,
10 not to say that this is one of them, but I guess we
11 can all have our own opinion. But, you know, it's
12 yeah, what you all are looking, you're not going to
13 find. I just hate to break it to you. And, you
14 know, we should have freedom of expression. We have
15 have a First Amendment Right, and that should be
16 respected in our country. We live in a world today
17 where people don't want people to be able to speak
18 freely to be able to freely express themselves and
19 peacefully assemble, which all the videos you showed
20 proved that so good luck to you.

21 MR. GOLDBERG: You don't want to encourage
22 me to ask you any more questions.

23 THE WITNESS: No, I don't.

24 MR. GOLDBERG: You might want to stop.
25 Thank you. We want the transcript expedited

1 transcript two-day turn around. And we've dealt
2 with Paul before.

3 (Deposition concluded at 5:06 p.m.)

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1 WITNESS SIGNATURE/CORRECTION PAGE.

2 If there are any typographical errors
3 to your deposition, indicate them below:

4

5 PAGE/LINE

6 Change to

7 Change to

8 Change to

9 Change to

10 Any other changes to your deposition
11 are to be listed below with a statement as to the
12 reason for such change.

13 PAGE/LINE	CORRECTION	REASON FOR CHANGE
14		
15		
16		
17		
18		

19 I, COUY GRIFFIN, do hereby certify
20 that I have read the foregoing pages of my testimony
21 as transcribed and that the same is a true and
22 correct transcript of the testimony given by me in
23 this deposition except for the changes made.

24

25 Couy Griffin

1 STATE OF NEW MEXICO
COUNTY OF SANTA FE
2 FIRST JUDICIAL DISTRICT
3

STATE OF NEW MEXICO, ex rel,
4 MARCO WHITE, MARK MITCHELL,
and LESLIE LAKIND,

5
Plaintiff,

6 v No. D-101-CV-2022-00473

7
COUY GRIFFIN,
8
Respondent.

9
REPORTER'S CERTIFICATE

10
I, Kristine Kaczor, RPR, CCR # 545, DO
11 HEREBY CERTIFY that on July 20, 2022, the Deposition
of COUY GRIFFIN was taken before me at the request
12 of Joseph Goldberg and the sealed expedited original
thereof was retained by:

13
Joseph Goldberg
14 20 First Plaza NW, Suite 700
Albuquerque, NM 87102
15 505-842-9960
jg@fbdlaw.com

16
I FURTHER CERTIFY that copies of this
17 certificate have been mailed or delivered to the
18 following counsel and parties not represented by
counsel appearing at the taking of the
19 deposition:

20
I FURTHER CERTIFY that the cost of the
21 original and one copy of the deposition to
JOSEPH GOLDBERG is \$.

22
I FURTHER CERTIFY that I did administer the
23 oath to the witness herein prior to the taking of
the deposition; that I did thereafter report in
24 stenographic shorthand the questions and answers set
forth herein, and the foregoing is a true and
25 correct transcript of the proceedings had upon the

1 ability.

2 I FURTHER CERTIFY that I am neither
3 employed by nor related to any of the parties or
4 attorneys in this case and that I have no interest
5 in the final disposition of this case in any court.

6

7

8

Kristine Kaczor, RPR, CCR
Certified Court Reporter #545
License Expires: 09-30-22

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