

1

2

3

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

8

9

10

11 INTERVIEW OF: RONNA MCDANIEL

12

13

14

15 Wednesday, June 1, 2022

16

17 Washington, D.C.

18

19

20 The interview in the above matter was held via Zoom, commencing at 11:09 a.m.

21 Present: Representative Lofgren.

1

2     Appearances:

3

4

5     For the SELECT COMMITTEE TO INVESTIGATE

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

7

8     [REDACTED] STAFF ASSOCIATE

9     [REDACTED] INVESTIGATIVE COUNSEL

10    [REDACTED] PROFESSIONAL STAFF MEMBER

11    [REDACTED] SENIOR INVESTIGATIVE COUNSEL

12    [REDACTED] OF COUNSEL TO THE VICE CHAIR

13

14

15     For RONNA MCDANIEL

16

17     TODD STEGGERDA

18     EMILY KELLEY

1

2 [REDACTED] We'll go on the record now.

3 Good morning. This is a transcribed interview of Ronna McDaniel by the House  
4 Select Committee to Investigate the January 6th Attack on the United States Capitol  
5 pursuant to House Resolution 503.

6 Ms. McDaniel, can you please state your name and spell your last name for the  
7 record.

8 Ms. McDaniel. Sure. My name is Ronna McDaniel, M-c-D-a-n-i-e-l.

9 [REDACTED] And I'm [REDACTED] I'm a senior investigative counsel for the  
10 House Select Committee, and, also of counsel to the vice chair of the select committee,  
11 Representative Liz Cheney.

12 [REDACTED] [REDACTED] I'm an investigative counsel  
13 with the committee. Good to see you again, Ms. McDaniel. Good to see you, Todd.

14 [REDACTED] And [REDACTED] do you want to introduce yourself?

15 [REDACTED] Hi. I'm off screen. I'm [REDACTED] I'm just running  
16 operations for this.

17 [REDACTED] And Mr. Steggerda, you want to introduce yourself and your  
18 colleague.

19 Mr. Steggerda. Sure. So my name is Todd Steggerda. I'm a partner with  
20 McGuireWoods in Washington representing Chairwoman McDaniel. I am joined by  
21 Emily Kelley, an associate in McGuireWoods, my colleague, who's joining remotely via  
22 Zoom audio only from our Washington, D.C. office. We are here in Michigan today.

23 [REDACTED] Great. And thank you very much for taking the time to do this.

24 So this will be a staff-led interview, but members of the committee have the  
25 option to join. Right now it looks like we do not have any members of the committee.

1 If they do join, I anticipate that their name will show up. I don't think you can see the  
2 list of participants, but either way we will try to keep an eye on it and if a member or  
3 more joins, we'll try to announce it for the record.

4 So as I said, it'll be a staff-led interview, but if members join, obviously they're  
5 welcomed to ask questions at any time. Because this is a transcribed interview, there's  
6 an official reporter transcribing the record. As you know, please wait until each  
7 question is completed before you begin your response and we'll try to wait until your  
8 response is complete before we ask our next question. That's obviously because the  
9 court reporter can only transcribe what one person is saying at a time. Also, the  
10 stenographer cannot record nonverbal responses such as shaking your head. So it's  
11 important that you answer each question with an audible verbal response.

12 We also ask that you provide complete answers based on your best recollection.  
13 If the question is not clear, or if you don't understand, please ask for clarification. If you  
14 don't know the answer, obviously, you can say so, but if you do know the answer, you  
15 need to answer it, and can't say you don't know.

16 You're not being sworn in, so this is not under oath, but I do want to make sure  
17 that you understand, obviously, that it's unlawful to intentionally provide false  
18 information to Congress. Do you understand that?

19 Ms. McDaniel. Yes.

20 [REDACTED] Now I know some of my colleagues on the select committee staff  
21 met with you in March. This is not intended to repeat everything from that  
22 conversation in March, but just to go over some specific topics that we want to have on  
23 the record. But before we get into that, is there anything about your informal testimony  
24 from March that you want to correct, if there's anything that occurred to you later that  
25 you realize after more thought was incorrect, anything you want to change or correct



1 from that?

2 Ms. McDaniel. Not that I recall.

3 [REDACTED] Okay. We'll try to keep this short, but please let us know at any  
4 time if you need a break, or if you need to speak privately with your counsel, we can  
5 accommodate that. If you want to speak with your counsel, we can take a break, go off  
6 the record, and you can just turn off both the audio and video so we can't hear or see  
7 anything you're doing.

8 So with that, do you have any questions before we get going?

9 Mr. Steggerda. John, just one question on administrative process. What's the  
10 current committee policy with respect to sharing a copy of the transcribed interview and  
11 including the video at some point in the near to midterm with counsel for the witnesses?

12 [REDACTED] Yes. So you will be given an opportunity to review. Both you and  
13 your client have an opportunity to review the transcript to make any corrections. It  
14 takes several days to get the transcript ready, but then you'll be notified and then you  
15 have a time period in which you can come in and review it.

16 Unfortunately, at least right now, the process is a bit cumbersome where we ask  
17 that you come in and review it in person. I don't know the answer to your question  
18 about reviewing the video, but I assume if you wanted to review the video so you can  
19 compare it to the written transcript, we can make arrangements to do that.

20 Mr. Steggerda. Okay. Thank you.

21 EXAMINATION

22 BY [REDACTED]

23 Q Ms. McDaniel, how long have you been with the Republican National  
24 Committee?

25 A Close to 5 years now. Over 5 years now.

1 Q And what is your position at the RNC?

2 A I am the chairperson of the Republican National Committee.

3 Q And you've had that same position for the 5 years you're referring to. Is  
4 that correct?

5 A Correct. So I guess I was with the RNC before that as the State chairman,  
6 and then as national committeewoman, but as chair it's been 5 years.

7 Q Thank you. As you know, President Trump and some of his outside counsel  
8 and other supporters talked extensively about Dominion voting machines and allegations  
9 that Dominion voting machines changed votes from Trump to Biden.

10 Did the RNC ever make any allegations about Dominion voting machines changing  
11 votes?

12 A Not that I recall. We did have the issue with Antrim County early on. I  
13 don't think it was a machine issue; it was -- from my understanding, it was a user issue  
14 and I think it was found pretty early on on election night with the 6,000 votes that were  
15 incorrectly put in for Biden and then later corrected for Trump.

16 Q To your knowledge, did the RNC make a deliberate decision not to talk about  
17 problems, alleged problems, with the Dominion voting machines?

18 A Our -- my counsel did advise me on some of those issues, yes.

19 Q Okay.

20 Mr. Steggerda. John, to be clear in terms of -- I think -- I think it's -- you know, I'll  
21 allow my client to talk about the content, the general subject matter what she talked to  
22 her counsel about, but obviously, she's not -- she's not going to share privileged  
23 communications with the legal team at the RNC.

24 BY [REDACTED]:

25 Q Right. So -- and I'm obviously not interested in legal advice, but Ms.

1       McDaniel, if you can answer this: Did the RNC reach any conclusion about whether or  
2       not the allegations about Dominion voting machines switching votes from Trump to Biden  
3       were substantiated?

4             A     So we didn't conduct any type of investigation on that. We didn't have  
5       purview on that, so that was left to the proper authorities. However, based on what my  
6       counsel said, we were very careful not to engage in anything without substantiation.

7             Q     And so, did you reach the conclusion that there was not sufficient  
8       substantiation regarding the allegation of Dominion voting machines switching votes to  
9       be able to make those allegations?

10            A     We didn't see anything through any internal discussions that showed that,  
11       so --

12            Q     I'd now like to ask some questions about so-called alternate electors, and I  
13       just want to make sure we all have sort of the same understanding of what that means.  
14       And if you use a different term, please let me know. So when I'm going to refer to  
15       alternate electors, these are going to be in States where the State authority declared that  
16       Joe Biden was the winner in that State, but the Trump electors nonetheless met and  
17       signed certifications that they were electors.

18            So do you understand what I mean by alternate electors?

19            A     Yeah. My understanding of them were as contingent electors in case any  
20       legal challenges changed the result of any State. So then, they would've met as a  
21       necessary step in case to meet the requirement by the Supreme Court, but they were  
22       contingent in case legal challenges changed something in any particular State.

23            Q     So when was the first time that you can recall learning about the concept  
24       that these alternate electors were going to meet and cast electoral votes?

25            A     So to the best of my recollection, the first -- I don't have the exact date.

1 My memory is that it was after kind of the White House Christmas party season and prior  
2 to December 14th. So somewhere maybe within a few days before December 14th that  
3 I received a call for the RNC to help bring the electors together for this contingent  
4 purpose based on potential legal challenges that hadn't been finished yet.

5 Q And I know it's hard to recall specific dates from something that happened a  
6 long time ago, but the Supreme Court rejected the petition in Texas versus Pennsylvania  
7 on December 11th of 2020. Do you recall whether that call you received was before or  
8 after the Supreme Court's action?

9 A I don't recall -- I really don't recall when it would be. It would've come  
10 through the White House switchboard. So my gut would be that it was before that.

11 Q Okay. But do you recall there being any express conversation about  
12 whether or not there was still a case pending with the Supreme Court at the time?

13 A My understanding is that there was that case, but there were other cases as  
14 well. So there were many cases going on.

15 Q Okay. And who was the call from?

16 A When I received the call, again, I don't remember the exact date, it was -- it  
17 was from the White House switchboard, and it was President Trump who had contacted  
18 me.

19 Q And did President Trump have anyone else on the line with him?

20 A He introduced me to a gentleman named John Eastman.

21 Q And was it just the three of you on the call, meaning President Trump, John  
22 Eastman, and you?

23 A I don't know.

24 Q Okay. As far as you know, though, you were the only three?

25 A As far as I know, those were the only people who I spoke to on the call.

1 Q Okay.

2 A Whether or not I don't know if he was patched in, those things I don't know.

3 Q Understand. And I'll just note for the record that Representative Zoe  
4 Lofgren has joined us.

5 A Okay.

6 Q So what did the President say when he called you?

7 A So to the best of my recollection, and again it's a long time ago, he  
8 introduced me to John Eastman, I was not familiar with him at the time. So I vaguely  
9 remember him mentioning that he was a professor, and then essentially he turned the  
10 call over to Mr. Eastman, who then proceeded to talk about the importance of the RNC  
11 helping the campaign gather these contingent electors in case any of the legal challenges  
12 that were ongoing changed the result of any of the States. And so, that would fulfill the  
13 requirement for the electors meeting if it went to the Supreme Court.

14 Q And do you remember President Trump saying anything other than  
15 introducing John Eastman?

16 A I don't remember that. I remember he may have said -- I really just don't  
17 remember. I remember the John Eastman portion, and that's -- that's the thing I  
18 remember the most about the call.

19 Q Okay. And did Professor Eastman when he was proposing that the RNC try  
20 to have these so-called alternate electors or Trump electors meet, did he expressly refer  
21 to the possibility that there could be an outcome in one of the cases that would make  
22 them necessary?

23 A Yeah. That was my understanding. I took it as there was pending  
24 litigation that could change the outcome of a State. So please help these contingent  
25 electors meet in case something happened where the outcome of a State election

1 changed, based on these legal actions.

2 Q And did Professor Eastman give any other reason why those alternate  
3 electors might be necessary?

4 A Not that I recall.

5 Q Did Professor Eastman make any reference to the possibility of State  
6 legislatures adopting those electors?

7 A Not that I recall.

8 Q And did Professor Eastman say anything about those electors potentially  
9 being useful at a joint session of Congress on January 6th?

10 A Not that I recall.

11 Q Okay. And then similarly, did Professor Eastman say anything about the  
12 alternate electors providing a possible basis for the Vice President to reject the Biden  
13 electors for those States?

14 A Not that I recall. I don't remember him saying that at all.

15 Q Okay. So what was your reaction to their requests?

16 A So it was two-fold: First, I called the campaign, because that's typically role  
17 of the campaign to gather the electors because they are actually representing the  
18 candidate. So I called Justin Clark who was from the campaign. He's also counsel. I  
19 don't know if that's privilege, but my impression from the conversation was that they  
20 were already aware of it and that they were working on it. And then I subsequently  
21 hung up the phone and I believe -- this is, again, a long time ago. This is my memory.  
22 It may be not exact, but I believe I called back the White House to say that the campaign  
23 was working on this already and let President Trump know. And at that time, I believe I  
24 only spoke to him and it was a quick call.

25 Q But you spoke directly to the President and as far as you recall nobody else

1 was on the call?

2 A That's my recollection. I don't remember John Eastman on that call.

3 Q Okay. And did the President say anything that you can recall on that call?

4 A Just great. It was a very short call.

5 Q Okay. And so when you called Mr. Clark, Justin Clark, he indicated that the  
6 campaign was already working on having the alternate electors meet?

7 A He seemed to be aware of bringing the electors together, yeah. He said  
8 we're on top of it.

9 Q Okay. Did he give you any indication of what had prompted the campaign  
10 to have those alternate electors meet?

11 A No. It was a very short discussion.

12 Q So what happened next?

13 A What?

14 Q I'm sorry. What was that?

15 A To the best of my recollection, it was just a short call because I called right  
16 back and they were kind of already on task on that.

17 Q Right. And we obviously understand this was a long time ago and that all of  
18 your answers are just to the best of your recollection at this time. We totally  
19 understand that.

20 So what happened next? Did you have further conversations with anybody  
21 about this issue?

22 A I did. Yeah, I spoke to my counsel.

23 Q And who was that?

24 A Matt Raymer at the time. And just to share the conversation, I wasn't  
25 familiar with Professor Eastman so I just wanted to make sure that we knew who he was,

1 and my impression, because I don't want to share my conversation with my counsel, but  
2 my impression was that there has been precedent for this and that we could go forward.  
3 And then I spoke to my chief and our political director through our chief kind of took the  
4 lead on that, Chris Carr.

5 Q So Mr. Carr was the political director?

6 A Correct.

7 Q And when you say your chief, that's the chief of staff?

8 A Correct.

9 Q And who is that?

10 A Richard Walters.

11 Mr. Steggerda. Do you remember -- can I just intrude, [REDACTED], just to clarify. Do  
12 you remember a specific discussion with Richard Walters or just you --

13 Ms. McDaniel. I don't remember specifically talking to Richard, but I know, you  
14 know, that would have been my standard operation of how I do things when I've called  
15 counsel and I would call my chief.

16 BY [REDACTED]:

17 Q And so when you talked to -- it sounds like multiple, people from within the  
18 RNC about this -- did you give them any instruction to do or not do anything?

19 A Just to help make sure the electors gathered in a contingent way in the  
20 contested States to help the campaign with that, and then also to make sure that the  
21 electors in the States that President Trump won also gathered.

22 Q And when you say, "helped make sure the electors gather," what exactly was  
23 the RNC's role in that, given that it sounds like the campaign sort of had the lead for that?

24 A I think more just helping them reach out and assemble them, but my  
25 understanding is the campaign did take the lead and we just were helping them in that



1       role.

2               Q     Okay.   So I'm going to go through a list of names and you can just tell me  
3       whether you had any conversations with these people that you can recall about the issue  
4       of alternate electors.   Brian Barrett?

5               A     I don't recall talking to Brian, but Brian does work for the RNC and would've  
6       reported to Chris Carr.

7               Q     What about Mandy Abbott?

8               A     No, I don't recall talking to Mandy about it.

9               Q     Jeremy Hughes?

10              A     I don't recall talking to Jeremy.

11              Q     John Black?

12              A     I do recall talking to John Black.

13              Q     And what was John Black's role at the time?

14              A     So I think my recollection is that Chris kind of had John help, and take a little  
15     bit more of a lead on that as well.   JB is what we call him.

16              Q     Okay.   And what was Mr. Black's position within the RNC?

17              A     John is what would be called the regional political director.   So most of the  
18     people you just mentioned would be regional political directors.   And you have to  
19     remember, these teams with the campaign had been working side by side through the  
20     whole election for close to 2 years.   So they knew each other very well and worked in  
21     the field together pretty much every day.

22              Q     And which region did John Black have?

23              A     John Black had -- I know he had Pennsylvania and he had Michigan.   Those  
24     are the two States I recall.

25              Q     Okay.   And those are States where there were alternate electors, but it

1 sounds like from what you're saying in addition to that he may have been involved in  
2 making sure that the electors in States where it was undisputed that President Trump  
3 won that they also met. Is that right?

4 A Correct.

5 Q Okay. Do you remember anything about your conversation with Mr. Black  
6 as it pertains to alternate electors?

7 A I know we had conversations. I don't recall anything specifically, though.  
8 I mean I know at the time we definitely had some conversations, but I don't remember  
9 them all.

10 Q Okay. Did you have any conversations with Clayton Henson about  
11 alternate electors?

12 A Not that I recall.

13 Q Did you have any conversations with Brian Seitchik?

14 A Not that I recall.

15 Q Seitchik. Did you have any conversations with Michael Roman about  
16 alternate electors?

17 A No. Not that I recall.

18 Q Okay. At any point, did anyone either at the RNC or the campaign express  
19 any concerns about the plan to have the alternate electors gather and cast votes?

20 A Not that I recall, because we had cleared it with our counsel who had let us  
21 know that there had been precedent for this, and so, we moved forward.

22 Q It's my understanding from other testimony that at some point, the lawyers  
23 and others from the campaign decided they were not going to work on the issue of  
24 alternate electors anymore, and that it was going to, instead, be run by Rudy Giuliani and  
25 his team.

1 Do you have any familiarity with that?

2 A I do not. I don't know about those conversations.

3 Q Okay. And did you talk to Laura Cox, who we understand at the time was  
4 the GOP chair in Michigan. Did you talk to her about alternate electors?

5 A I did talk to Laura about the contingent electors, yes.

6 Q And what did you discuss with her?

7 A I think Laura -- I don't know what conversations Laura was having with the  
8 campaign, but Laura reached out to me and similar to what I said my understanding was  
9 that it was based on potential legal actions going through. I didn't view it as something  
10 that was necessarily official, just more of a kind of a ceremonial, but that we'd been asked  
11 to bring the electors together by the campaign.

12 Q Okay. And did Ms. Cox, at some point, suggest that instead of having the  
13 electors in Michigan meet and sign certificates and cast their electoral votes, that they,  
14 instead, have some sort of more ceremonial type activity?

15 A Yeah. I wasn't -- the best of my recollection, I wasn't familiar with the  
16 paperwork or things that people were signing or that part of it, but I know Laura raised  
17 some concerns with me -- I don't know if it was via phone -- where some were going over  
18 to the Capitol to meet and asked if that was something that they should do. And I  
19 said -- you know, I don't think you should do that. Just have them gather and whatever  
20 you feel comfortable with.

21 Q What was the nature of Ms. Cox's concerns?

22 A You'd have to ask her. I think she just -- I think she had concerns about  
23 going over to the Capitol and if they weren't welcome there or weren't invited there, so --

24 Q Our understanding is that in at least one State, the electors actually changed  
25 the language in the certificate to make clear that they were meeting and certifying

1 themselves only contingently; meaning, contingent upon winning a case that would  
2 change the outcome of the election in that State. Do you have any familiarity with that?

3 A I do through news reports. I didn't know about that at the time.

4 Q Okay. And leaving aside news reports, did anybody discuss it with you  
5 afterwards?

6 A Afterwards, no. I do know in the State of Pennsylvania one of our RNC  
7 members, Christine Torette had concerns that she raised with me through this process  
8 and, again, I expressed to her my belief based on my conversations that this was a  
9 contingent process based on potential legal challenges. So I don't know what  
10 paperwork they changed. I wasn't privy to that.

11 Q Okay. And did you say her name was Christine Torette?

12 A Correct. T-o-r-r-e-t-t-i, I believe (sic).

13 Q And what can you recall about the concerns that Ms. Torette raised?

14 A She just seemed concerned about stating that they were electors if they  
15 weren't. She didn't want any confusion on that. So I was very clear this is a contingent  
16 process; that this is only if legal challenges changed the outcome of States, which was my  
17 belief.

18 Q And was your belief based on what Professor Eastman had told you?

19 A Yes.

20 Q Was it based on anything else?

21 A That was my belief based on that conversation, yes. It wasn't based on  
22 anything else.

23 Q Sorry. You cut out. What was the last thing you said?

24 A That's where my -- my understanding of that came, yes.

25 Q At some point, did you learn that these alternate electors could be used for a

1 different purpose, meaning, other than in the event that President Trump succeeded in  
2 litigation?

3 A I was not familiar with that. I was -- my understanding was that it was  
4 essentially for in case this litigation changed the outcome.

5 Mr. Steggerda. Let me clarify and give her a chance to clarify. He's asking you a  
6 very broad question. At some point did you have some awareness down the road that  
7 these electors may be used a different way? You can give him a sense of your  
8 December --

9 Ms. McDaniel. I may have heard things about it, but I didn't understand the  
10 whole process. Not my understanding for why they were gathering.

11 Mr. Steggerda. John, I was just intruding just to clear it up. You know, when  
12 this, as you mentioned before, the January 6th, or the Vice President Pence, which you  
13 mentioned, when that, you know, started to bubble up publicly, she has awareness of  
14 that as you get into December. So I want to make sure that her testimony's clear for the  
15 record. You can talk to her about that and she'll tell you what she remembers about it.

16 Ms. McDaniel. As the January 6th got closer, I started to see some of that in the  
17 news, but at the time that was not my understanding.

18 BY [REDACTED]:

19 Q And did you learn anything about possible uses of the alternate electors for  
20 purposes other than contingency in the litigation through any source other than the  
21 news; meaning, did you have any conversations with anybody about other ways that the  
22 alternate electors could be used?

23 A I could have at some point, but not that I recall.

24 Q Were you surprised when it turned out that the President and some of his  
25 supporters were pressuring the Vice President to reject the Biden electors based on the

1 existence of these so-called alternate electors?

2 A So just so you have a framework of where I was when all of this started  
3 coming out, and when I started to learn about it mainly through the news was in  
4 December. So I had -- you know, we were in the middle of the Georgia runoff and other  
5 things, my campaign for RNC chair again, other things that were going on, but in  
6 December 28th, [REDACTED]  
7 [REDACTED]  
8 [REDACTED] So I was just kind of out  
9 of the loop. [REDACTED]

10 So as this started to percolate in the news, yes, I had a vague awareness of some  
11 of these things, but I was not in the intimate conversations or knowing these things.  
12 Most of what I was seeing was through the news.

13 Q So you, I believe, said earlier you got a call from President Trump and  
14 Professor Eastman about the alternate electors, and then you called President Trump  
15 back to let him know that the campaign was working on it. Did you have any other  
16 conversations with President Trump about alternate electors other than those two?

17 A So I'm the [inaudible] contingent electors, because that was my  
18 understanding and that was our intention. I know that after, you know, we were in  
19 Georgia, we were focusing on that, but when December 14th came, we -- I know that I  
20 sent a note to I think Molly at the White House to let them know the list. I think Chris  
21 Carr sent me something saying, These are all the electors that met. So I sent that.

22 I may have spoken to the President just to let him know. I don't recall, but  
23 beyond that, I don't recall having any other conversations beyond -- beyond that about  
24 those contingent electors.

25 Q Okay. And even as of December 14th, when the electors met and cast their

1 vote, it was still your understanding that they were just contingent in the event of a  
2 successful lawsuit. Is that correct?

3 A Correct.

4 Q Did you speak with the President on January 6th?

5 A I did not speak with the President on January 6th.

6 Q Did you ever speak with the President about January 6th, meaning, either  
7 the joint session of Congress or the attack on the Capitol?

8 A So, again, I have this crazy injury that happens where I'm a little out of the  
9 loop. I recall --

10 Mr. Steggerda. Just to clarify, where were you between December 28th and  
11 January 6th when you flew down to Amelia Island?

12 Ms. McDaniel. So I was in Michigan. I was in Georgia December 28th. [REDACTED]  
13 [REDACTED] Flew to Michigan, had surgery the 29th. Then  
14 was in Michigan up until January 6th where I flew to Amelia Island where we had our RNC  
15 meeting. So I was preparing for that.

16 Mr. Steggerda. [REDACTED]

17 Ms. McDaniel. [REDACTED]

18 [REDACTED] I do vaguely recall calling the  
19 President, I believe, on January 1st, to [REDACTED] wish  
20 him happy New Year, because I had not spoken to him [REDACTED]  
21 [REDACTED] So we had not been in communications.

22 So that's -- the one call I had, and then January 7th, he called in to -- I was in the  
23 middle of an RNC meeting. It was called a "members only" meeting, and he called, and  
24 we did not speak about January 6th. He called to say that the reports that he wasn't  
25 coming to the meeting were false, and I put him on speaker and he said something like

1       that to the members of that effect.   But during that time frame we did not -- I didn't  
2       discuss January 6th with him that day, or January 7th.

3                       BY [REDACTED]:

4               Q     Okay.   And on the call on January 1st, do you recall whether you and the  
5       President discussed the upcoming joint session of Congress that was to take place on  
6       January 6th?

7               A     So I -- I don't recall very much of that conversation.   I do have a recollection  
8       of him asking me what my relationship was with the Vice President, and I said I didn't  
9       know him very well.   And that is the main thing I remember from that call on top of me  
10      telling him that I had broken my ankle and that I had surgery.   But I will say [REDACTED]  
11      [REDACTED] I just don't remember much about that call.

12              Q     When the President asked you about your relationship with Vice President  
13      Pence, did the President make any reference to the possibility of Vice President Pence  
14      affecting the outcome of the election?

15              A     He could've.   It was certainly in the news.   I was aware of it because it was  
16      percolating in the news.   I remember him asking me how well I knew him and that was  
17      the extent of pretty much that conversation that I recall.

18              Q     Okay.   And so at that time, was it your understanding that he was asking  
19      about your relationship with Vice President Pence because the President, at that time,  
20      was engaged in an effort to convince Vice President Pence to affect the outcome of the  
21      election?

22              A     I can't say if that's what it was about.   I just recall him being, like, How well  
23      do you know Mike Pence?   And I was, like, Not that well.   That's my -- that's my  
24      memory of that, aside from letting him know that I had had this surgery and wishing him  
25      a happy New Year.



1           Q    And then you said on January 7th you talked to him, but he did not say  
2 anything about the events of the day before, correct?

3           A    Correct.

4           Q    What about later? Did he ever say anything to you about what happened  
5 on January 6th?

6           A    Yeah. Everything that you've seen in the public, I believe he said privately  
7 in one way or another that, you know, the Vice President had the authority to -- I don't  
8 know the correct legal term, but he had the authority to not accept the electors, but  
9 everything he said publicly, I think he may have said privately at some point or another in  
10 the past year.

11          Q    What else can you recall about what he said to you about January 6th?

12          A    Just things that you've seen in the public. I mean, it's not like anything you  
13 see him say in the public he may have said privately as well. I don't recall specifically.

14          Q    Okay. Is there anything else you can recall that he said about January 6th  
15 besides what you've already told us? Just to the extent you can recall anything he said,  
16 can you just walk us through that?

17          A    I mean, he very much believes that the Vice President had the authority to  
18 not accept the electors and he has said that to me.

19          Q    Did he say anything about whether he thought the violence was justified?

20          A    We have never -- my recollection is we've never talked about that.

21          Q    Okay. Did you have any conversations with the President about Members  
22 of Congress who either did or did not object to certification?

23          A    I don't recall those -- having conversations about Members of Congress,  
24 about who objected or did other things, but it could've. I mean, he's -- it's not like the  
25 things -- he says things pretty publicly, so --

1 Q Have you talked to President Trump at all about your appearance before this  
2 committee?

3 A He's -- I've not talked to him about it today, but I did tell him before I  
4 appeared the first time in the informal setting that I was doing that, yes.

5 Q Did he say anything to you about what you should or should not say to the  
6 committee?

7 A No, he did not -- he did not tell me to say anything. He did not give me any  
8 instruction.

9 [REDACTED] Okay. I see Ms. Lofgren's on. Do you have any questions at this  
10 time, Ms. Lofgren?

11 Okay. I'll turn it over to my colleague, [REDACTED].

12 BY [REDACTED]:

13 Q Good morning, Ms. McDaniel. Good to see you again.

14 A Hi, [REDACTED].

15 Q So we're going to switch gears a bit and talk a bit about your -- the informal  
16 interview we had and cover some of those topics, not in the same detail, but just very  
17 generally and try to move at a pretty quick pace here.

18 A Okay.

19 Q So I'm going to talk to you a bit about the RNC digital fundraising efforts  
20 post-election?

21 A Okay.

22 Q With regard to TMAGAC, and TMAGAC is the joint fundraising committee  
23 between the RNC and the Trump campaign, correct?

24 A Correct.

25 Q And when I say -- if I say the - refer to the committee or refer to that, I'm

1 talking about that and not Trump Victory?

2 A Correct. Okay.

3 Q Sorry. Give me one second.

4 Now, you told us last time that you were -- you were aware that Austin  
5 Boedigheimer served as the deputy digital director -- does that sound correct -- for the  
6 RNC?

7 A That sounds correct. I didn't interact with him very much, but that sounds  
8 correct.

9 Q And did you understand Mr. Boedigheimer to be the head of the fundraising  
10 team that covered emails and texts for TMAGAC?

11 A I probably didn't know that, but I -- that makes sense. I don't know.

12 Q What was your understanding as to who led the digital fundraising efforts  
13 for TMAGAC for the 2020-cycle?

14 A So my primary interaction was with Kevin Zambrano who ran our digital  
15 operations. So that's -- I didn't know as many people who worked under him in the  
16 digital department. I knew Kevin. The way I view it and TMAGAC, the Trump Make  
17 America Great Again Committee, so we call it TMAGAC, was in existence before I became  
18 RNC chair. So it was something that we kind of inherited from the 2016 campaign.  
19 And the way it functioned was the way it functioned during the 2016 campaign where the  
20 campaign -- where the Trump campaign kind of led the messaging, but there were certain  
21 RNC staff that helped produce or create the emails.

22 Q I thank you for the explanation. Our investigation thus far indicates that  
23 the RNC employees served as the copywriters for the emails and then Austin -- I'll give  
24 you the framework as I understand it. You tell me whether that fits with your  
25 understanding -- that there were RNC copywriters who drafted the copy for TMAGAC.

1 That was under the supervision of Austin Boedigheimer, who was deputy director for the  
2 RNC who reported to Kevin Zambrano and also, at times, who reported to Gary Coby who  
3 was the digital director for the Trump campaign. Does that all sound accurate to you?

4 A It could be. I wasn't familiar with the day-to-day operations. I dealt  
5 primarily with Kevin.

6 Q And when you dealt with Kevin, in what capacity? Can you tell us what  
7 were your dealings with 2020?

8 A So the way it works for the RNC is my primary function is out on the road  
9 raising money, doing media, and then my chief of staff would run the day-to-day with the  
10 staffing operations, and then we had our department heads, Kevin was one of them.

11 So I knew Kevin ran digital. He would maybe run copy by me if I was a signer on  
12 an email, but the day-to-day operations I just didn't have a lot of oversight of or purview  
13 of.

14 Q Now, when you say that the -- I think you made a comment just a second  
15 ago that the Trump campaign led the messaging. Can you explain to us what you  
16 understood how they led the messaging in relation to the RNC copywriters drafting the  
17 actual copy? What was your understanding of how that process works?

18 A Sure. When you have a joint fundraising agreement with any  
19 campaign -- we have joint fundraising agreements right now with some other candidates  
20 as well, they kind of take the lead. It's about their campaign, their candidate's, this was  
21 a process that had been in place during the 2016 campaign.

22 So we kind of kept the same process, we didn't change anything, and they really  
23 led the messaging. They were the drivers of that as they should be, because it was their  
24 campaign that was being messaged about. And so our team would help facilitate  
25 writing those emails. That's my understanding to the best of my ability to understand

1 the process, because I will not say that I have full knowledge of it, but that they looked to  
2 the campaign or the candidate to determine how to message.

3 Mr. Steggerda. How much time during the general election and the  
4 post-election period, how much time comparatively did you devote to the digital  
5 fundraising of TMAGAC versus your major donor programs and the other RNC initiatives,  
6 like Georgia and all the other things you were working on? Put it in perspective for us.

7 Ms. McDaniel. Most of my time is the Trump Victory portion of it, [REDACTED]. I  
8 mean, I focused on the major donors. So that's where I'm primarily focused. And then  
9 our digital operation, you know, worked with the Trump campaign to create messaging  
10 for TMAGAC and that was really, I think, led the messaging was led by Gary or Bill Stepien  
11 or Brad Parscale the people who ran the Trump campaign. 90 percent of my time was  
12 major donor fundraising.

13

BY [REDACTED]

14 Q Okay. That's helpful. So let's talk a bit about the messaging. As with  
15 any campaign, as I've come to learn in this job, there's an effort to capture the candidate  
16 in the messaging so that when recipients receive the messaging, they have an  
17 understanding or a feeling that it's coming from the candidate supporting. Is that a fair  
18 estimation?

19 A Yeah. I think most -- most candidates are -- the ones who message for their  
20 campaigns, yeah, that makes sense.

21 Q So here -- and this is going to be my characterization, so if you disagree,  
22 please let me know. We've heard testimony from RNC employees who said that they  
23 tried to only capture the messaging from President Trump, but also the tone, meaning,  
24 President Trump speaks a certain way, he might speak in a way that's hyperbolic, that's  
25 aggressive, that's more kind of fire-breathing, and they wanted to capture that in the

1 fundraising emails because that's what people expect from President Trump.

2 Does that fit with your understanding of what the fundraising emails were doing?

3 A Yeah, that makes sense that that would be what the fundraising emails  
4 would do.

5 Q Now, I want to move forward to Election Day. Were you aware of any  
6 preparations for fundraising post-election through TMAGAC? Can you tell us a bit about  
7 what your understanding of what TMAGAC would do post-election was?

8 A So I do know that -- so there was a split with TMAGAC, right, where the  
9 campaign would have a certain amount and the RNC would have a certain amount. My  
10 recollection's not perfect on this. I recall in the summer at some point when the  
11 campaign manager shifted to Bill Stepien, that I was called to shift the split to a  
12 pretty -- heavily weighted towards the campaign. I think 95 percent of the fundraising  
13 goes to the campaign and 5 percent to the RNC. I think we landed on 90/10. I don't  
14 know exactly. And then at the same time, I think we discussed what would happen  
15 post-election in case we want to do a recount or other types of things, and then it would  
16 revert back to -- I don't know what exactly the split was, but it would change from that  
17 90/10 split.

18 Q Let's focus a bit on the messaging. Were you aware of any preparations for  
19 post-election messaging that would come out of TMAGAC?

20 A I was not aware of any messaging.

21 Q Were you aware going into Election Day more broadly as to whether there  
22 would be -- that there would be a focus on claims of fraud or of Democrats trying to steal  
23 the election, coming out generally from the communications apparatus of either the  
24 campaign or the RNC?

25 A So I wasn't part of any planning or strategy on that, so I'm not -- I'm not

1 familiar with the planning on that. I will say this, [REDACTED] is, this was something we were  
2 worried about the entire cycle. I mean, if you look at the election in a whole, we were  
3 seeing that double the amount of voters voted by mail, we were seeing safeguards  
4 stripped through the courts, and we raised these concerns early on through a lot of our  
5 court cases with voter ID being stripped away or signature match being downgraded in  
6 States like Nevada or live ballots being thrown out.

7 So this -- I don't think this was a new thing. This was something we were very  
8 concerned about throughout the cycle, and a cycle where pretty much every election law  
9 was changed in the name of COVID, and we were very, very concerned about States that  
10 were being inundated with mail-in voting that didn't have the capacity and concerns on  
11 the safeguard of the election.

12 So that is -- that, as a whole, I know I talked about on TV, and certainly we had  
13 court cases leading up to Election Day with real concerns. So I believe that messaging  
14 probably was part of what we were talking about throughout the cycle so we could have  
15 these election cases.

16 Q Did you have any discussions about the messaging -- about a messaging  
17 strategy to say the election was stolen for using that strategy after the election?

18 A I don't recall having a strategy session on that.

19 Q Did you become aware -- well, let me provide you some context.

20 Let's go to Election Day. So put aside anything that was uncovered after Election  
21 Day. On Election Day, were you aware of any findings by the RNC that would support a  
22 coordinated fraud effort by Democrats to try to steal the election?

23 And Ms. McDaniel, what I'm trying to parse out here just to save time, is that I  
24 want to parse out concerns that the RNC had with process that was publicly litigated or  
25 discussions regarding how to interpret State statute so whether State officials had legal

1 authority to make changes pre-election, and I want to talk about something separate,  
2 which is about Democrats trying to steal the election, something that goes more to the  
3 core of fraud.

4 Does that distinction I'm trying to draw make sense?

5 A Yeah, I see what you're saying. I guess, [REDACTED], in my view, I was very  
6 concerned and I maintain this concern. I know you probably have a different viewpoint  
7 that when you change to an almost all mail-in election that there's room for fraud.  
8 When I say there's a conspiracy, I don't know about that; I just think when you have, for  
9 example, a State like Pennsylvania go from, what, 260,000 absentee ballots in 2016 to  
10 2.6 million in 2020, that's a concern. It's a 900 percent increase in mail-in voting with a  
11 system that wasn't prepared for it.

12 So when you have voter ID removed, when you have States sending out live  
13 ballots without any verification to unvetted voter rolls, I have a lot of -- I still maintain a  
14 lot of concerns about those types of systems and safeguards that were eliminated in the  
15 name of COVID, like showing up in person to show your voter ID because we were  
16 limiting public interaction, which I understand. Those are things that I had up until the  
17 election. They were real, valid concerns that I had. I continue to have those concerns.

18 Q And I appreciate that explanation, but I'm trying to draw a finer distinction,  
19 not about your concerns, but about your conclusions. So what I'm trying to uncover  
20 from you: On Election Day, had you drawn any conclusions about election fraud --

21 A [Inaudible.]

22 Q So and I know it would be hard, but I'm asking on Election Day, had the RNC  
23 drawn any conclusions that election fraud had occurred, or that the Democrats were  
24 trying to steal the election? So, again, I'm talking about conclusions, not concerns that  
25 you may have, that you may still have to this present day.



1           A    I don't think you could've drawn any conclusions on Election Day. I think  
2 we knew there were concerns that we wanted to look at, based on the massive change in  
3 overhaul of the election, but remember, Election Day, you're only getting the AB/EB voter  
4 file, right? You don't have any of the Election Day information on who voted actually on  
5 Election Day. That takes months, that takes up until, in some States, until February of  
6 2021 where we actually get the voter file of who voted on Election Day.

7           So I guess I had enough concerns that I wanted to investigate, or have an audit or  
8 look at things. It's very hard to do after the fact once the ballot's gone from the  
9 envelope, it's really hard to put those pieces of the puzzle back together, but I certainly  
10 had those concerns before the election. I raised them. I continue to have those  
11 concerns. But no, we wouldn't have enough evidence to say for sure that those things  
12 happened, but we certainly wanted to look at it.

13          Q    I appreciate that explanation, Ms. McDaniel. I -- what we see when we  
14 look at the fundraising emails is immediately from Election Day forward, RNC copywriters  
15 are drafting emails saying that Democrats are trying to steal the election, and that's  
16 almost a verbatim quote. And we see that language -- our investigations revealed day of  
17 election that language is approved, that language starts going out through TMAGAC on  
18 November 4th, saying again and again, the Democrats are trying to steal the election.

19          So I think that, you know, to my inexperienced ears sounds very different than  
20 the more nuanced explanation you're offering here about, you know, questions regarding  
21 process.

22          So what would be helpful to have you explain is that, is that the kind of messaging  
23 that you were referencing earlier that the campaign was driving and that was coming  
24 from the campaign, that kind of tone or messaging, or was that something that was  
25 shared that you saw as in line with the RNC's position on November 3rd and 4th?

1           A     So, again, I would refer to the way TMAGAC ran that the messaging came  
2     from the campaign and the candidate, but I think there were lots of concerns about the  
3     election that we had, and we were raising money here or to engage in legal action to  
4     pursue those irregularities and concerns that we had.

5           Q     Well, I'm asking, again, something a little more specific is that, specifically,  
6     that the Democrats are trying to steal the election.    So the emails I'm referencing  
7     around this time period are making what I would frame as conclusory statements, right?  
8     They're not saying merely the process provides concerns regarding fraud and not knowing  
9     who could be engaged in fraud; they're saying the Democratic Party is trying to steal the  
10    election.   That kind of messaging, is that the kind of thing that you understood to be in  
11    line with the RNC's position around November 3rd and 4th, or was that something that  
12    you understood when you referenced how it worked with TMAGAC that it was coming  
13    from the campaign because that's how TMAGAC worked?

14          A     I think that primary messaging was coming from TMAGAC, but it's in line  
15    with some of the concerns -- again, it wasn't just a one-day cutoff.   I think a lot of those  
16    concerns began before when we saw Mark Elias going into court and saying, Let's get rid  
17    of voter ID and expand out harvesting.   And the amount of cases that we were in, we  
18    had really valid concerns.   And I will say this again, [REDACTED] and I believe this, if one person  
19    votes illegally they are stealing the vote of a legal vote.   I believe that, and we have to  
20    limit any ability for somebody to vote illegally.

21          Mr. Steggerda.   What was your impression in the immediate aftermath of the  
22    election, because you move into November when you're starting to digest what had  
23    happened, what was your experience with that?

24          Ms. McDaniel.   We were getting massive incoming.   I mean, people saying they  
25    weren't able to poll watch to people saying computers were connected to the internet.

1 I mean, imagine the incoming I was receiving from people across the country. So we  
2 have an obligation at the RNC to take that seriously when we have our voters -- we took  
3 that very seriously. I spoke about it publicly. I had a lot of concerns that we were  
4 going to pursue, which is our right. As the canvassing process is happening, as we're  
5 looking at things, as we're certifying, so those concerns existed, especially with the  
6 amount of -- I think we had 2,800 incident reports within the first week. We had people  
7 signing affidavits saying they weren't able to observe. These were just -- that's just a  
8 snippet of the type of incoming we had from voters across the country.

9 BY [REDACTED]:

10 Q So I want to turn back to something you said when I asked you parsing out  
11 the language between the RNC versus the campaign, I think you pointed to it being  
12 TMAGAC, but as TMAGAC is a joint fundraising committee, did you mean when you said  
13 TMAGAC, were you trying to say it was coming from the campaign or it was coming from  
14 TMAGAC, which as we both agreed is RNC copywriters drafting that copy? So I'm trying  
15 to parse out our conversation --

16 A The way TMAGAC worked is majority shareholder, think of it that way, was  
17 the campaign. They're 90 percent and they -- they were the overriding messaging and  
18 they led the messaging for the emails. And then, RNC staff worked on that, they did, but  
19 they were not the driver of the messaging. That was coming from the campaign.

20 In the joint fundraising agreement when the campaign, any campaign has the  
21 majority position, they are going to be the ones driving the messaging and determining  
22 the messaging and the staff may be helping facilitate that messaging, but they're not the  
23 ones creating it.

24 Q So is it fair to say that the messaging I referenced earlier, the Democrats are  
25 trying to steal the election, things of that nature, that's the kind of messaging that you

1 saw the campaign as driving, not the RNC?

2 A If it was coming from TMAGAC, I would say the leader of the messaging  
3 would have been coming from the campaign.

4 Q Okay.

5 A That's the way the structure had been in place from the 2016 cycle all the  
6 way through 2017, 2018 and into, you know, 2020.

7 Q Now Ms. McDaniel, in our informal interview, we talked about whether  
8 anyone had raised broad concerns about the content of TMAGAC messages, and you  
9 noted that Mr. Raymer, the RNC counsel occasionally vetoed certain messages that he  
10 believes were inaccurate. Do you remember that discussion?

11 A I don't -- I'm sorry, [REDACTED], I don't recall that. So I was not on the -- my  
12 understanding -- I wasn't on the approval chains for TMAGAC, but we did have legal on  
13 there. So Justin or an attorney could've said vetoed, or said we don't feel comfortable  
14 with this, but I wouldn't have always seen that. So that wouldn't have been elevated to  
15 me.

16 Q What was your understanding as to the role that RNC legal was serving on  
17 these approval chains?

18 A So the understanding I had was that we had a legal set of eyes on these  
19 emails just to -- which we do on a lot of our emails, even some of our tweets, just to make  
20 sure that, you know, in part, it's due diligence to have some legal eyes on anything that's  
21 messaging.

22 Q So our understanding has been there was representatives from the comms  
23 department, from research to the extent that -- understanding that research and  
24 communications overlap and then there was representation from legal and between  
25 those three groups, legal handled, obviously, the legal elements making sure things that

1        were said were legal and accurate and not, kind of, pushing up on legal concerns, comms  
2        was there for messaging consistency, and then research was there to ensure accuracy, for  
3        example, if a fundraising email had a statistic regarding a number of votes, research  
4        would check that number and make sure it was accurate.    Does that --

5                A        That makes sense, yeah.    That sounds right to me.

1

2 [12:10 p.m.]

3 BY [REDACTED]:

4 Q Is it fair to say that was consistent with your understanding?

5 A Yeah, I won't say I didn't know how I wasn't in the weeds on that, but that  
6 makes sense that that's the process that would have been in place.7 Q In the post-election period, did you have any discussions -- let's talk about  
8 the first 2 weeks after the election, and I don't want to get into the substance of  
9 something counsel told you in giving you advice -- but did you have any broader  
10 discussions about concerns about what should or should not be said about the election in  
11 fundraising emails?12 A I don't recall having discussions with our counsel about language for  
13 fundraising emails. I don't recall. It could have, but I don't recall having discussions on  
14 that.

15 Q How about discussions with anyone?

16 Mr. Steggerda. As it pertains to fundraising, emails from TMAGAC, or what?

17 BY [REDACTED]:

18 Q Yeah, as to the substance of claims made in fundraising emails in the  
19 post-election period about what should or should not be said, did you have those  
20 discussions with anyone at the RNC or the campaign or anywhere else?

21 A I don't recall having any discussions about that.

22 Q Do you recall any discussions about not asserting that President Trump had  
23 won the election in fundraising emails?

24 A I don't recall having any discussions about that.

25 Q Did you have any discussion, more generally, regarding with RNC employees

1 about not asserting openly that President Trump had affirmatively won the election?

2 A I don't, I don't remember having any conversations about that.

3 Q So we've reviewed a variety of approval chains which -- now I am not going  
4 to show them to you, but we can if, you know, if need be. But what we have seen  
5 about, about a week after the election, so from -- you know, I think on  
6 November -- election is November 7th -- excuse me, November 3rd. November 7th, the  
7 media calls the election for President Biden. And then from November -- by  
8 November 11th, 12th on, what we have seen in approval chains is that the RNC is revising  
9 copy to -- in my esti -- in our characterization, which I will tell you what the revisions are  
10 so that you can see --

11 A Okay.

12 Q -- that makes softer claims regarding the status of the race. So I will  
13 actually just show you because we are making pretty good time. There is -- I am going  
14 to show you what's been marked as exhibit 1. If we can pull that up.

15 Ms. McDaniel, have you ever seen one of these approval chains? I guess you  
16 were on them when you were surrogate. Is that when it gets afforded to you?

17 A So when I'm the signer, I -- I sign -- I -- you know, approve the -- the email  
18 messages or the text messages, whatever.

19 Mr. Steggerda. Do you mean if you are the surrogate --

20 Ms. McDaniel. If I am the surrogate signing it, if it is coming from me, then that's  
21 when they send it to me. I don't see them otherwise.

22 Mr. Steggerda. And [REDACTED], do you see the chairwoman on the document that you  
23 have in front of you? Is she on that email chain?

24 [REDACTED] We have seen her on what she is -- what she is saying now  
25 is my understanding, but she would not be on these chains. That's why -- I don't want to

1 one through them like one by one. Well, I am just trying to -- and I am happy to proffer  
2 to you, Ms. McDaniel, what's here so we can save time.

3 Mr. Steggerda. Yeah, [REDACTED] just to be clear, I am completely comfortable with  
4 the line of questioning. I don't -- I'm not aware that she received or certainly saw these  
5 edits, but she is happy to give you her perspective on these.

6 Ms. McDaniel. I don't recall being on these chains or seeing the edits. So I was  
7 the signer.

8 BY [REDACTED]

9 Q Yeah, and that's my understanding, too. So I'll tell you some of the edits,  
10 and then we can -- I don't think we have it. Maybe it is not logged up right now. But  
11 we see edits, for example, starting in November 11th, where edits -- where copywriters  
12 are saying, you know, they're trying to, quote, "secure four more years," and instead it is  
13 removed -- here you can see. And if I am moving too quickly, Ms. McDaniel --

14 A So I can't see it anyway, so I am just going to listen to you.

15 Q Okay. So here -- is this is an example here of edits, and it's a little tough to  
16 see on the screen when it is not on paper. But you can see that in the lighter-colored  
17 gray, those are the track changes for new language --

18 A Okay.

19 Q -- and on the right is the old language. So here what happened here is we  
20 have an edit from the RNC that says -- it says -- it said -- it used to say, you know, they're  
21 trying to say, you know, they're trying to -- if a patriot chips in money, we can secure four  
22 more years, and instead it is defend the election.

23 A Okay.

24 Q In reading that, just as someone who's experienced in politics, would you see  
25 that as two different claims asking for money to secure four more years, and then edits



1 saying, Don't say secure four more years, say defend the election?

2 A I would say it is a difference. I don't know the thought process behind it or  
3 who made the edits, but --

4 Mr. Steggerda. Do you remember ever seeing that email?

5 Ms. McDaniel. Yeah, I haven't seen this email before.

6 BY [REDACTED]

7 Q And just in your experience, when you say it's different, would you say that it  
8 makes a language softer, or how would you describe the difference?

9 A I would just say it is -- it is different, defend the election. Yeah, it is two  
10 different concepts. I would say it is two different concepts.

11 Q And is it fair to say that "secure four more years," that concept suggests that  
12 there would be another potential term for President Trump versus defend the election  
13 doesn't really get to that level of assertion?

14 A Yeah, I mean, I can say it is different. I don't know the rationale, so I don't  
15 know if our legal counsel did this or why. So I'm just having a hard time just looking at  
16 the edits and knowing what the rationale was behind it from our -- from the later edits.  
17 Did it come from our legal team? Is that what you're seeing on the chain?

18 Q That's correct, Ms. McDaniel. All the edits I am going to show you come  
19 from RNC legal. And understanding the --

20 A I would just defer -- I mean, I would from my standpoint, I would defer to  
21 our legal team to have reasons for why they would do that, and I would -- that's why they  
22 were on the chains, so.

23 Mr. Steggerda. And to the extent that he's asking you what your impression is,  
24 recognizing that you didn't see them back in the day contemporaneously --

25 Ms. McDaniel. Yeah.

1           Mr. Steggerda. -- other than you seeing a difference, does anything else jump out  
2 at you in terms of your view today?

3           Ms. McDaniel. Yeah, I just think it says different things, I mean.

4           BY [REDACTED]:

5           Q     And I appreciate that, Ms. McDaniel. I want to empath what that  
6 difference is without getting too obvious. Is it fair to say that the initial language  
7 suggests that, here, that a donation might lead to an additional term for President Trump  
8 versus the new language of defend the election perhaps is more focused on an election  
9 integrity argument and does not make a claim regarding four more years for President  
10 Trump? Is that a fair reading of these changes?

11          A     I would say that's a fair difference, yeah.

12          Q     Now, Ms. McDaniel, I won't show you these emails again and again, but we  
13 see a variety of these edits from four more years to steal to defend the election.

14          Mr. Steggerda. [REDACTED] can you get back to the live screen with you on there?  
15 We are still looking at the email.

16          BY [REDACTED]:

17          Q     Yeah, if you could drop -- yeah.

18                 So, Ms. McDaniel, we see a lot of these changes around this time period. So at  
19 that point President Biden has been declared President-elect. We are more than a week  
20 out from the election. Did you have any conversations with anyone at the RNC?  
21 Again, if we -- legal advice comes up, you can let me know, but with anyone at the RNC  
22 that suggested that any messaging through any medium should be softening the claims  
23 made regarding the state of the election?

24          A     I don't recall that language. I just know I recall my counsel. I don't know  
25 what I can say. But like you mentioned with the Dominion and with other things, my

1 counsel advising us to be careful with claims, and just making sure that, that we were  
2 running things through our legal team, which is what we did. I believe the emails -- I  
3 don't remember discussing the emails. I do remember discussing it with some tweets  
4 and some messaging and other things as well, just making sure that we were following  
5 our counsel's advice on anything that we were saying.

6 Q So is it fair to say that your counsel was trying to ensure that messaging that  
7 went out from the RNC regarding the election was legally accurate?

8 A I think our counsel was always in the position of just protecting the RNC and  
9 making sure that we were following the law. I don't -- I don't know. You would have  
10 to ask him.

11 Q I appreciate it.

12 A Right.

13 Q So I am going to skip these emails and just for time purposes, but as I noted,  
14 we see a lot of these changes of changing "four more years" to "defend the election."  
15 We see changes from "four more years" to "finish the fight." So we see a lot of stripping  
16 out --

17 A Okay.

18 Q -- four more years. And I am just providing you background. But,  
19 normally, I would show you the emails, but I am going to skip that for purposes of time.  
20 So I'm going to show you what's been marked as exhibit, excuse me, exhibit 6 --

21 A Okay.

22 Q -- which is a November 20th approval chain. Again, not one I expect that  
23 you received or were on, but the typical individuals from the Trump campaign and the  
24 RNC are on this. I will scroll -- I would show you to the -- on the second page, there are  
25 edits Jenna Kirsch, as you can see. On November 19th, Jenna Kirsch from legal at the

1 RNC offered some edits. And I am going to just walk through a couple of those edits  
2 with you quickly and get your thoughts on those.

3 So on page 4, Ms. Kirsch changes the language in the emails from voter fraud to  
4 voting irregularities. Is it fair to say that calling something a voting irregularity versus  
5 saying it is voter fraud, that's softer language voting irregularities?

6 Mr. Steggerda. [REDACTED], before you ask that question -- do you remember ever  
7 receiving this email?

8 Ms. McDaniel. I do not.

9 Mr. Steggerda. Do you remember talking to any of your staff about the content  
10 of this email?

11 Ms. McDaniel. I do not.

12 Mr. Steggerda. Have you talked in the successive months since this email was  
13 created with any of the people that edited that about why they made the edits?

14 Ms. McDaniel. I have not.

15 Mr. Steggerda. Do you know why they made the edits based on discussions that  
16 you have had with people editing that?

17 Ms. McDaniel. I have not had those discussions.

18 Yeah, I would say those are different concepts.

19 BY [REDACTED]:

20 Q Well, if we can go back to that. Can you tell us what's your understanding  
21 of why voter fraud is different than voting irregularities?

22 Mr. Steggerda. And [REDACTED] just to be clear, like I -- I would -- she is here  
23 cooperating. If her opinion 18 months later is helpful and relevant to your inquiry, I'm  
24 going on let her answer. But I just want to be very clear from a foundation perspective,  
25 that it's -- as to these particular edits or this particular, you know, she doesn't have a

1 concurrent involvement that makes the testimony, at least in my view, overly helpful.

2 But I'll let her answer.

3 BY [REDACTED]:

4 Q And just, Ms. McDaniel, what I'm asking you about here, I'm not inquiring as  
5 to, for you to tell us why RNC legal made these edits, but what I'm asking is for you  
6 obviously have -- you have been with the RNC a long time. You have a deep working  
7 knowledge from when it comes to RNC from both messaging to its position at this time  
8 period. This is November 19th, 2020. So I would appreciate your insight into the  
9 differences you would read these between saying voter fraud and versus now saying  
10 voting irregularities and how you understand that distinction?

11 A So, I would say fraud would imply, you know, somebody intentionally  
12 committing a crime or trying to commit fraud, right? And then an irregularity would  
13 mean there were problems or concerns. There could be fraud, but it is not the same as  
14 intentionally committing a crime.

15 Q So is it fair to say for voting irregularities that may encompass things like  
16 issues with the process regarding voting?

17 A Yeah, I think voting irregularities could create issues with the process, but  
18 could also create the potential for fraud.

19 Q Okay. And then versus saying here saying overwhelming evidence of voter  
20 fraud would be speaking to evidence of the intent and the actual presence of voter fraud.  
21 Is that fair?

22 A Yeah, I think that's fair.

23 Q Okay. I want to scroll down a little further down on page 4 of this exhibit.  
24 And here, you see it is the edit again regarding voter fraud to voting irregularities. And  
25 then in the next line we have this edit where the original line says, One thing has become

1 very clear, Joe Biden did not win this election, and the fake news media is continuing to  
2 ignore the biggest political scam of all time. And RNC legal removes the line, Joe Biden  
3 did not win this election. Do you see that, Ms. McDaniel?

4 A I do.

5 Q Now, is it fair to say that that edit is substantive in nature and changes the  
6 meaning of the sentence?

7 A Yeah, it seems like something a legal team would do. They're going to be  
8 more careful, and I think that's something that they would probably do in a lot of emails.  
9 They're more -- they're going to be conservative.

10 Q Now, when you say -- are you drawing a distinction between the legal team  
11 here and the RNC more generally? Or is it fair to say this was consistent with the RNC's  
12 position at that time?

13 A I think at any legal team, including the RNC is just being more conservative  
14 on all types of things like this. I know the RNC team was always looking out for the best  
15 interest of the RNC and also the candidate as well. So I can't speak to why they made  
16 that edit or what reason they did. So --

17 Q Did you have any discussions about -- again, we are now in  
18 November 19th -- so several weeks out from the election, did you have any discussions  
19 regarding broader RNC messaging about not making claims such as this one that Joe  
20 Biden did not win the election?

21 A So, again, I didn't talk about the emails, but I know that the legal team, you  
22 know, raised, you know, concerns, and we want to make sure that we were following  
23 their guidance when it came to messaging on various fronts which we did.

24 Mr. Steggerda. [REDACTED], can you go back to full screen, please?

25 [REDACTED] Yes, please.

1           Mr. Steggerda. Thank you.

2           BY [REDACTED]:

3           Q     Did anyone else raise -- you said the legal team raised concerns -- did anyone  
4 else raise concerns beside the legal team?

5           A     Not that I recall. I mean, you know, we took we took advice from our  
6 counsel. That's where everybody kind of went to. Our comms team, everybody  
7 looked to our counsel.

8           Q     Did you have -- and, again, I am trying -- I don't want to get into what your  
9 counsel told you, specifically, besides what we already have discussed, but did you ever  
10 put back or have any concerns that this was too conservative or that there was nothing  
11 factually wrong with these kind of statements?

12          Mr. Steggerda. Just to be clear, did you ever see the email that [REDACTED] was asking  
13 about?

14          Ms. McDaniel. I had never seen that email. So I wasn't on the approval chain  
15 of these emails, so this process that you're showing me, it's the first time I am seeing that.  
16 So I -- but I will say I did have discussions with my counsel at certain times and wanted us  
17 to follow his guidance.

18          BY [REDACTED]:

19          Q     Well, what I was asking was broader than email because would you agree  
20 that President Trump regarding this time was saying that Joe Biden did not win the  
21 election?

22          A     Yeah, President Trump, I believe, was saying that. I just was deferring to  
23 our counsel. Listen, I have a fiduciary responsibility to the RNC. I don't know -- if I am  
24 going to be chair, I want to make sure I am following the legal guidance of my counsel.  
25 Because it is not just me, it is potentially the RNC. So counsel actually isn't my counsel.

1 He is the RNC's counsel. So if he is giving us guidance or saying, Hey guys, pull back  
2 here, then that is what I instructed our team to do. I didn't see those emails, but if it  
3 was tweets or other communication or language we used, to the best of our ability, I'm  
4 not saying we were perfect at that probably, but we really try to follow his counsel.

5 Q And I appreciate that explanation. What I am trying to understand is that  
6 from your vantage point, was there a period where the RNC and President Trump  
7 diverged in the review of the 2020 election? Because when I see -- the messaging I see  
8 here from the RNC copywriters, understanding you didn't see this at its time, is consistent  
9 with what President Trump is saying at that time, and it is still consistent. And it seems  
10 to me that you were saying that the RNC's institution by November 19th had decided that  
11 that was no longer the RNC's position. Is that a fair characterization, or was it  
12 something else?

13 A Yeah, I don't know if I would agree with that. I think we were still at that  
14 time pursuing legal challenges. We were still concerned about their regularities we had.  
15 I still have those concerns, to be candid. So I don't think there was a shift. What I do  
16 think, Tem, is there was a shift in, you know, the RNC's having to focus now on the  
17 Georgia runoff. The Trump campaign's legal team kind of shifted. When we initially  
18 started, I would say we were very together. When it was Justin Clark or Eric Kirschman  
19 or others that initially started out coming in the first couple weeks out of the campaign.

20 And then there was a shift where, I think, Justin was no longer kind of the lead on  
21 the Trump legal, and it became Rudy. And that's where we just worked less with Rudy's  
22 team where he was doing his own thing, and the RNC was doing the things that we have  
23 to do, focused on how are we going to deploy hundreds of staff down to Georgia? How  
24 are we going to raise money to do that? We also had an election coming up for our  
25 officers. So I think more than anything, you know, we are not just one -- we are not just



1 one candidate, we are the whole party. We had to start focusing on Georgia, and the  
2 Trump campaign was focusing on the things that their legal team was pursuing.

3 Q So would it be fair to say that when Mr. Giuliani took over the President's  
4 legal efforts, that the RNC at that time took a shift to focus perhaps on the party -- on the  
5 broader party goal as opposed to -- and then allow Mr. Giuliani to focus on the  
6 President's legal efforts? Is that a split in your --

7 A It actually happened where their team started doing their things, and we  
8 became less part of -- initially, I would say we were very, very integrated, right? There  
9 were meetings with counsel at the White House. There were hotlines we were setting  
10 up. We were working with the Trump legal team at that time. It was just Justin Clark  
11 and others. And then there was -- and I don't know the catalyst for that shift, but there  
12 was definitely a shift, and then I feel like Rudy had kind of his own team and was doing his  
13 own thing and didn't really reach out to the RNC.

14 Mr. Steggerda. In the December 2020 timeframe, what was the level of effort of  
15 the RNC in the Georgia Senate runoff case?

16 Ms. McDaniel. Yeah, we were all Georgia. I mean, we deployed not just  
17 political staff, we deployed our accounting staff, everybody had to go to Georgia. I  
18 mean, all hands on deck were in Georgia. Remember the balance of the Senate was at  
19 stake. We all know this. But this was just overriding for us. Plus, you know, you have  
20 Thanksgiving coming and Christmas, so it is hard. Staff is burned out. So we were  
21 really heavily shifting to our Georgia focus, which we actually -- the Trump campaign  
22 didn't have that same issue. And then the legal team was run by Rudy and others. But  
23 we were not as integrated with them as they were -- initial legal team coming out of  
24 November or --

25 BY [REDACTED]:

1           Q    Now, was the lower level of integration because there were disagreements  
2   with Mr. Giuliani's approach to the legal efforts?

3           A    Yeah, you know, there was -- I know there was tension with Rudy and the  
4   Trump legal team. I think that's pretty well documented. We would give them the  
5   affidavits we had already assembled. I mean, we -- our field team was on the ground  
6   doing a lot of the leg work, initially, with the incoming of concerns that we were hearing.  
7   So we turned that over. I wouldn't say there was tension, I would just say they were the  
8   ones running with it, and our legal team was less and less engaged. It was -- Matt  
9   Mason -- Matt Morgan was a big part of it initially with Justin Clark. So that's an internal  
10  thing with the campaign as to why things shifted, but there was a shift.

11          Q    Now, Ms. McDaniel, what was your awareness as to how you kept apprised  
12  of the various fraud claims that were made. We talked about dominion, for example.  
13  There is a lot of fraud claims that are asserted in the post-election period. Sitting here  
14  today, you have talked about you still have concerns. Sitting here today, are you aware  
15  of any dispositive fraud that existed that you think impacted the election results?

16          A    No -- look, at a time I said this to you before, I think you can never  
17  retrace -- it is hard to retrace steps once the ballots are removed from the envelope. I  
18  think a lot of the issues early on were putting a porous election with massive absentee  
19  request forms or live ballots going out to unvetted voter rolls that created just massive  
20  opportunity for error in systems that were not capable of influx. I mean, I have talked  
21  about Pennsylvania. They had a 900 percent increase in mail-in voting. Georgia had a  
22  500 percent increase. Michigan had 100 percent increase. Wisconsin had an  
23  800 percent increase in mail-in voting. I mean, I just think the system was not ready for  
24  that on top of voter ID laws being stripped away.

25          So I do have concerns. You're never going to uncover that unless you can go

1 back and see who voted it and when. And once that ballot's removed, there's no  
2 identifying marker. Those concerns exist for me. When you see things like in  
3 Wisconsin, prosecutions or criminal charges being brought against people who were  
4 going into nursing homes and collecting ballots from voters who clearly were not aware,  
5 those are things that are concerning. I still have concerns about the way the 2020  
6 election was administered. I hope we don't go back to an election like that. We need  
7 to keep those safeguards in place.

8 Q And I appreciate that explanation. I want to compare what you said,  
9 though, to what we see in fundraising emails coming from RNC written by RNC  
10 employees, but then sent out through TMAGAC. So in late December -- so we have -- by  
11 that point, I think that most of the lawsuits, I think, have been resolved by late December.  
12 On December 14, the States have certified the election. Understanding that we don't  
13 know what we don't know, in any election, but by December 22nd, RNC, through its  
14 copywriters, through TMAGAC, are still sending out emails. And I can show you one of  
15 these messages. Todd has seen this multiple times. But there are emails still  
16 indicating that Joe Biden -- if Joe Biden is to become President that he would be an  
17 illegitimate President. And what we are trying to understand is that where the  
18 RNC -- again, like I asked you before, when that consistent with RNC messaging versus is  
19 this messaging that's being driven by the campaign? And I'm happy to show you the  
20 email -- well, one of these emails -- but they come out multiple times, Ms. McDaniel.  
21 And it asks, folks -- it asks recipients, you know, whether they want their country to be  
22 run by Joe Biden, who would be an illegitimate President. And that goes out at least one  
23 time in December 22nd. It goes out again in December 27th.

24 A Okay.

25 Q Are you generally aware, more broadly, about messaging regarding the lack

1 of legitimacy to Joe Biden being President coming from either the RNC or the Trump  
2 campaign?

3 A I didn't see those messages as they were, you know -- as we have  
4 established. I didn't -- I wasn't part of the approval chain on that. But broadly aware,  
5 yes, that there were concerns about the election that persisted after and still persist.

6 Q Well, again, I don't want to use the term "concerned," I want to be specific  
7 with the language that's coming from RNC copywriters, which is not saying concerns  
8 about the election, it is saying Joe Biden, quote, "would be an illegitimate President," end  
9 quote. So sitting here today, is that -- from your recollection, would you say that  
10 messaging, that was the RNC's position at that time and still is, or is that messaging that  
11 you would ascribe to the Trump campaign?

12 A Well, like I said, the TMAGAC messaging came from the campaign. But I  
13 would say overall, there were lots of concerns with the election and the process. So I  
14 think that that was consistent up until, you know, Joe Biden was sworn in that we were  
15 going to continue to say these were very real concerns. I still wish that people looked at  
16 the problems that we had in the 2020 election.

17 Q But, Ms. McDaniel, again, that's not what the email says. The email says  
18 that Joe Biden would be an illegitimate President. The email could say the very  
19 thoughtful, nuanced things you're saying now. They don't say that. They go out to  
20 millions of people, and they say Joe Biden and would be, which as I read it, it is talking  
21 about at the point he becomes President, he would be illegitimate. So is that statement  
22 something that you would say is accurate or inaccurate?

23 A I'm not going to speak to -- I haven't seen the whole email, but I would say  
24 this is a concern that people have when an election is upended. And these were  
25 concerns that were very real at the time. Especially, remember when December, when

1 everybody is worried, and we are getting all these irregularities, and people who weren't  
2 available to poll-watch. And I think a lot of Republicans feel like the election was  
3 completely upended by these changes. So those were concerns that were real. Just  
4 like Democrats said President Trump was illegitimate. We heard that for 3 years. I  
5 mean, we heard a lot of that. A lot of Democrats refused to accept Trump as the  
6 President. They said it openly. So there were messaging like that on both sides of the  
7 aisle after both elections.

8 Q Ms. McDaniel, I can't speak for the Democrats, but I believe you can speak  
9 for the RNC, which is what I would like for to you do.

10 A And I would say those are real concerns that this election was not run fairly,  
11 was not run correctly, when you have over a 50 percent increase in mail-in voting.  
12 When you look at things like The New York Times, which very clearly stated that there are  
13 huge opportunities for problems in fraud and mail-in voting. When you look at a  
14 Secretary of State like Kim Wyman, who the Biden administration relies on very clearly as  
15 an expert in the field of mail-in voting. This says it took 10 years to put a process in  
16 place in Washington State where they felt comfortable with mail-in voting. And then  
17 you see States on fly have a 900 percent increase and 800 -- even the margin of error of  
18 1 percent is too much on top of poll watchers being disenfranchised. Lawyers going into  
19 court asking to downgrade the voting machines on the signature match. Live ballots  
20 being sent out. Absentee ballot requests being sent to every voter without vetting the  
21 voter rolls. I mean, these are huge concerns in an election like none other.

22 We have never had anything like this before. So, yes, those concerns were real.  
23 If we feel like it was an unfair election, then, yes, we are going to question the results.  
24 And that is how I felt. I think that's how a lot of our voters felt. And I don't think those  
25 concerns had been alleviated. Hopefully, with some of the laws being changed now, it

1 would be better for 2022.

2 Mr. Steggerda. And [REDACTED] just in terms of process where I just -- I know we've  
3 talked a little bit about the schedule, but it looks like it is 12:42, and I were -- we can  
4 power through. I don't think we need a break. But I just wanted to kind of remind the  
5 group of our time. It would be very, very helpful for Madam Chair to end no later than  
6 1:00, if we can.

7 Mr. [REDACTED] Yeah, I think we're making good time, so let's just keep  
8 pushing through.

9 Mr. Steggerda. Okay.

10 BY [REDACTED]:

11 Q Okay. I want to switch gears a bit, Ms. McDaniel, talk about Save America.  
12 Are you familiar with the Save America PAC, the President's leadership PAC?

13 A Yeah.

14 Q And you're aware that on or about September 9th when it was formed, it  
15 joined the joint fundraising agreement with the RNC and the Trump campaign?

16 A Ah, yes, I guess so.

17 Q And I don't know what -- I said November 9th, right?

18 A Yeah, I, I --

19 Mr. Steggerda. Do you remember the specific date that Save America --

20 Ms. McDaniel. I don't remember everything. I don't remember the exact date.

21 Mr. Steggerda. Okay.

22 Ms. McDaniel. That sounds about right.

23 Mr. Steggerda. But do you remember and believe that at some point after  
24 November 3rd, Save America was added to the JFC?

25 Ms. McDaniel. Correct.

1 BY [REDACTED]:

2 Q And, Ms. McDaniel, there's been a lot public reporting as to -- well, let me  
3 reframe that. A lot of the TMAGAC emails talk about raising money for an Election  
4 Defense Fund, and the need for the funds raised to help fight for election litigation, and  
5 that being kind a lot of the messaging that went out. Does that comfort with what you  
6 recall? Understanding you didn't look at each email, but generally there was money  
7 raised --

8 A Yes, in the broad messaging. On top of Georgia and other things, yes, I  
9 believe that that would be true for the messaging.

10 Q Did you have any discussions with anyone as to how -- this is just -- prior to  
11 January 6th, as to whether Save America would be contributing any funds for  
12 post-election litigation efforts?

13 A So I wasn't familiar with the structures of Save America, so I don't know  
14 what it legally could or couldn't do. So I remember asking that question, like what were  
15 the legal abilities of Save America. I don't recall the answer on that. But my  
16 understanding is that we were all going to be focused on litigating the issues that we  
17 were seeing coming out of the election in 2020.

18 Q And, Ms. McDaniel, isn't it accurate that the RNC undertook the heft of the  
19 legal litigation costs that came out post-election? Is that fair?

20 A Well, I can only speak to the RNC. I know we absolutely spent a significant  
21 amount of our legal costs. We are still spending a lot on legal costs. But I don't know  
22 what -- I don't know the exact numbers for Save America.

23 Q Did you ever inquire, though, that the RNC spending a lot of costs related to  
24 the President -- the President's election, did you ever have discussions about how much  
25 the campaign or Save America PAC would be contributing if the RNC was, as you said,

1 spending a whole lot of money on that?

2 A I know that I had one meeting about that early on with, excuse me, with  
3 Jared, and I believe it was Justin Clark about how that would happen. I don't even think  
4 Save America was in effect yet, maybe it was. And they had agreed that they would pay  
5 for some of the bills. That was my understanding. But the RNC, obviously, paid a lot of  
6 bills as well.

7 Q Now, would it surprise you then that according to FEC filings that SAVE  
8 American spent, I think in 2020, basically nothing on election-related expenses?

9 A I was not aware of that.

10 Mr. Steggerda. Do you know right or not?

11 Ms. McDaniel. I don't know if that's right or not. I'm not aware of their filings.

12 BY [REDACTED]

13 Q Assuming that's correct, would that surprising to you, or would that have  
14 been what you expected?

15 A Assuming that that's correct, I would have thought that there would have  
16 been some -- based on the conversations I had earlier that there was going to be some  
17 expenditures.

18 Q This conversation you had was with, you said Jared Kushner and Justin Clark?

19 A Correct.

20 Q And, effectively, is it fair to say that they represented to you that they would  
21 be taking on some of the legal expenses as well?

22 A That was my understanding, yes.

23 Q All right. I want to switch gears. We talked a lot about the fundraising  
24 emails that came out of TMAGAC. And the attack on the Capitol happened on the 6th.  
25 And I think as you are aware, Salesforce was the TMAGAC email service provider for the



1 RNC, but also helped send out TMAGAC emails. And after the election, Salesforce  
2 releases a statement. Are you familiar with the statement that Salesforce released  
3 concerning the RNC's use of its service after January 6th?

4 A Vaguely, but I don't recall it with specificity. I don't know how to say it.  
5 You might jog my memory. I vaguely remember it.

6 Q Okay. I am going to read it to you. And I am happy to put it up on the  
7 screen if my reading is difficult to understand. But I'll read it to you first. So they say  
8 this is on January 11th, and Salesforce says that "We are deeply" -- "We are all deeply  
9 troubled by the terrible events of January 6th. And while we all hope that they are  
10 never repeated, sadly there remains a risk of politically incited violence across the  
11 country. The Republican National Committee has been a longstanding customer,  
12 predating the current administration, and we have taken action to prevent its use of our  
13 services in any way that could lead to violence."

14 So that's a statement that Salesforce releases around several days after  
15 January 6th. Do you recall at that time being aware that Salesforce had made that  
16 public statement?

17 A So I hate to keep going back to my ankle, Tem. But as I mentioned, so I  
18 flew to Florida, probably shouldn't have, so soon after my surgery, was in excruciating  
19 pain, and then came back and had some serious blood clot issues -- which I know is  
20 personal information, but just to give you some perspective. And I was out of it. I  
21 mean, I was in excruciating pain, going to my vascular surgeon, and dealing with that.

22 So when I came back after the RNC meeting, which I believe was January 7th, I  
23 was still in a recovery mode, probably from pushing myself too hard after surgery. So I  
24 don't recall -- I do not have a really good recollection of things that were happening  
25 during that timeframe.

1 Q Would Richard Walters then have been the one that would have taken the  
2 lead in handling that?

3 A Probably Richard. I know we sent emails to the members and let them  
4 know I was out of pocket. I know that -- you know, we let people know that I was  
5 having these medical issues, unfortunately. And it probably wasn't smart traveling so  
6 soon after surgery, which I'm -- and so, I was really focused on my health at that point,  
7 and not really delved into it. I know it sounds crazy, but I just, you know, when you have  
8 four blood clots in your body, you take that seriously.

9 Q It sounds very serious. So would it be fair to say that -- so you would have  
10 expected that Mr. Walters would have taken the lead on this then, or is there someone  
11 else?

12 A If it's Salesforce, it would probably be Richard and then Kevin, who would  
13 deal with Salesforce on the digital front, Kevin Zambrano, and probably our legal team as  
14 well. I could not speak knowledgeably about that because I really just don't recall.

15 Q As you became better, did you then become aware of what the RNC, if  
16 anything, did in response to Salesforce's public statement?

17 A I don't remember what we did. I do remember there was a point where  
18 Salesforce started sending our emails again. So I believe the issue was resolved.

19 Q Is it fair to say that the statement that I just read that Salesforce is drawing  
20 some connection between the use of its service and the potential of violence? Is that a  
21 fair reading of what -- not what's true, but of what Salesforce is suggesting?

22 Mr. Steggerda. Respectfully, [REDACTED] I think there is a foundation. I'm not sure  
23 she has got the foundation to know what Salesforce was thinking or why they said it  
24 based on what she just testified.

25 BY [REDACTED]:

1           Q    And that's not what I am asking. I am asking in understanding -- in the  
2 statement coming to the RNC, for the public of purpose consumption to reflect  
3 Salesforce's position, is it fair to say that what Salesforce -- not intending, but what -- just  
4 reading it, they're drawing the connection between the fundraising emails and politically  
5 incited violence?

6           A    I can't speak for Salesforce. I would say if anyone is drawing that  
7 conclusion, I think it is flawed to stay that creating concerns about an election that was  
8 completely changed equates with encouraging people to commit violence at the Capitol.  
9 It is just not -- I don't see the connection. There is no way that the RNC, which we have  
10 made publicly clear, would ever encourage anyone to attack our Capitol or commit  
11 violence. But raising concerns about the election, I think is fair.

12          Q    Were you aware that Salesforce said publicly that it had taken action -- here  
13 it said that it has taken action and what that action was against the RNC?

14          A    Again, Tem, I was just -- you know, I can get doctor's notes. I can get you  
15 all my doctors -- I am fine. One of my doctors was actually a poll worker in Detroit. He  
16 can tell you all the problems he saw. But, yeah, I can -- and the vascular surgeon and  
17 the surgeon who dealt with my leg -- I just was not -- I really was not -- I was not as aware  
18 of some of these things because I had some serious medical issues going on.

19          Q    And, Ms. McDaniel, to be clear, I am not doubting the seriousness of your  
20 medical situation then, but I am asking -- again, if it has privilege, let us know -- but  
21 between that period of January 11th, even to the present day, are you at all aware of  
22 what action Salesforce took against the RNC at that time period?

23          A    So I remember there was a period that they said they weren't going to send  
24 our emails, and then very quickly that was restored. So I don't know what thought  
25 process they gave to restoring them. They continue to work with us. So clearly -- I

1 mean, not clearly, I am not going to speak for them. But my impression is that at some  
2 point, they came to the conclusion that the RNC was not involved in violence or  
3 perpetrating the violence or encouraging it. So they, obviously, felt comfortable enough  
4 to resume a working relationship with us.

5 Q Were you aware that Salesforce started reviewing some RNC emails before  
6 they would be sent to the public?

7 A I was not aware of that.

8 Q Did you ever order any kind of review of the RNC copywriting process or any  
9 analysis to see whether there was truth to there being any potential problems with the  
10 copy that was sent out post-election but pre-January 6th?

11 A Again, I wasn't on those approvals, and so I wouldn't have even known. In  
12 many cases, [REDACTED] this was the hardest [inaudible]. So, no, I haven't ordered them.

13 Q Yeah, and I wasn't asking so much a review based on the approval chains,  
14 but just post attack on the Capitol, Salesforce's statements, pausing the RNC's ability to  
15 send fundraising emails, in light of that, are you aware of the RNC engaging in any kind of  
16 review as to its copywriting process, or otherwise the messages it sends to its fundraising  
17 appeals?

18 A I don't recall having anything to review, but again I did not, in any way,  
19 believe that any of our emails had anything to do with inciting violence at the Capitol.  
20 We vehemently condemned that. The RNC was not part of that. I was not there at the  
21 Capitol that day. The RNC meeting was in Florida. We did not have any part in any of  
22 the rally or any of the events that certainly condemned the violence that happened at the  
23 Capitol that day.

24 Q And we are almost done, Ms. McDaniel. Have you heard of a company  
25 named DataPier?

1 A No, not that I recall. Data what?

2 Mr. Steggerda. DataPier?

3 Ms. McDaniel. Peer? P-e-e-r?

4 BY [REDACTED]:

5 Q P-i-e-r.

6 A No, I don't recall hearing about that company.

7 Q Are you familiar with any use of RNC written TMAGAC emails that were sent  
8 through a different service that wasn't Salesforce?

9 A I am not familiar with that.

10 Q Okay. If you can just give us one second, Ms. McDaniel.

11 Mr. [REDACTED] Well, Ms. McDaniel, thank you for -- I stopped two  
12 minutes early.

13 Ms. McDaniel. [REDACTED] yay.

14 Mr. [REDACTED] You have two minutes to go and enjoy your day, you  
15 know. But, Todd, thank you for the time. Ms. McDaniel, thank you for taking out the  
16 time today. Anything from you, John?

17 [REDACTED] No, thank you very much for your time. We appreciate it.

18 Ms. McDaniel. I just want to answer, because I said this to Todd, I am not  
19 familiar with anything, but I believe the campaign or Salesforce is now using a company  
20 called Nucleus. So the RNC is not using that, so they may be now. So I would just like  
21 to add that to that answer.

22 [REDACTED] Great. We appreciate the clarity. So with that said, we  
23 will adjourn subject to the call of the chair. Thank you both, and thank you to our court  
24 reporters as well.

1

2 [Whereupon, at 1:00 p.m., the interview was concluded.]

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15

Certificate of Deponent/Interviewee

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

\_\_\_\_\_  
Witness Name

\_\_\_\_\_  
Date