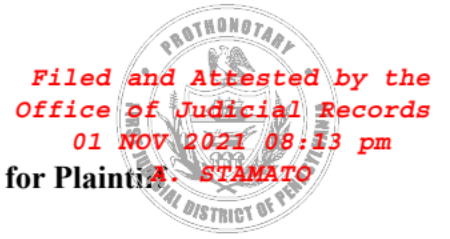


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Attorney for Plaintiff **A. STAMATO**

JAMES SAVAGE



Plaintiff

v.

DONALD J. TRUMP



and

RUDOLPH W. GIULIANI



and

DONALD J. TRUMP FOR PRESIDENT, INC.



and

RUDOLPH W. GIULIANI, PLLC



and

JENNA ELLIS



and

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL DIVISION

October 2021

No. 2495

JURY TRIAL DEMANDED

To All Defendants:

You have twenty (20) days to respond to the Complaint against you enclosed within, or a judgment may be entered against you.

Attorney for Plaintiff

GREGORY STENSTROM

[REDACTED]

and

LEAH HOOPES

[REDACTED]

and

PHILLIP KLINE

[REDACTED]

and

THE THOMAS MORE SOCIETY

[REDACTED]

Defendants.

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney, and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE, IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Philadelphia Bar Assoc.
1101 Market Street
Philadelphia, PA 19107
Tel.: (215) 238-6300

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plaza al partir de la fecha de la demanda y la notification. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demands en contra suya sin previo aviso o notification. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACION DE LICENCIADOS DE PHILADELPHIA COUNTY SERVICIO DE REFERENCIA E INFORMACION LEGAL

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Attorney for Plaintiff

JAMES SAVAGE

[REDACTED]

Plaintiff

v.

DONALD J. TRUMP

[REDACTED]

and

RUDOLPH W. GIULIANI

[REDACTED]

and

DONALD J. TRUMP FOR PRESIDENT, INC.

[REDACTED]

and

RUDOLPH W. GIULIANI, PLLC

[REDACTED]

and

JENNA ELLIS

[REDACTED]

and

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL DIVISION

October 2021

No. 2495

JURY TRIAL DEMANDED

To All Defendants:

You have twenty (20) days to respond to the Complaint against you enclosed within, or a judgment may be entered against you.



Attorney for Plaintiff

At any and all times relevant concerning the November 3rd presidential election, the Plaintiff was employed as the Delaware County Voting Machine Warehouse Supervisor/Chief Custodian. The Plaintiff managed the storage, security, programming, testing, and delivery of all voting equipment in Delaware County. As is well known by poll watchers and election officials, this position did not vest the Plaintiff with any ability to conduct vote tabulation whatsoever.

As the Plaintiff's employment as the Voting Machine Warehouse Supervisor required, the Plaintiff was present at the Delaware County vote counting center during the presidential vote tabulation. While Mr. Savage was performing his duties, two GOP poll watchers accused the Plaintiff of tampering with the presidential election vote tabulation by fraudulently uploading 50,000 votes for Joseph Biden, when the Plaintiff did nothing of the sort.

Defendants Gregory Stenstrom and Leah Hoopes, *infra*, the aforementioned two GOP poll watchers, baselessly claimed that they saw the Plaintiff use tampered versions of USB v-cards (mechanisms used in Delaware County's voting machines) to alter the vote tabulation of the 2020 Presidential election in Delaware County, and therefore the Commonwealth of Pennsylvania, with 50,000 votes for President Biden. Although the Defendants mostly referred to Mr. Savage by his job title, the Voting Machine Warehouse Supervisor, anyone who heard or saw these defamatory statements or insinuations would have known that they were referring to Mr. Savage, because he was the only Chief Custodian/Voting Machine Warehouse Supervisor position in Delaware County, so it was obvious there was only one person who was being accused of election fraud by all of the Defendants herein.

All Defendants herein knew that such fraud was impossible. Indeed, Defendant Hoopes stated unequivocally that Mr. Savage had "no experience" with USB v-cards in an effort to denigrate him, as further set forth *infra*; however, such an admission demonstrated her

knowledge that the Plaintiff, in fact, could not have interfered with vote tabulations in the 2020 Presidential election in Delaware County. Despite knowing the impossibility of such claims and/or insinuations, Defendant Donald J. Trump, his surrogates – including Defendant Rudolph W. Giuliani herein – and their followers spread, reposted, and disseminated these outrageously defamatory claims and/or insinuations against Mr. Savage, subjecting him to threats of physical violence, and causing Plaintiff to suffer *inter alia* two (2) heart attacks. Simply put, Mr. Savage's physical safety, and his reputation, were acceptable collateral damage for the wicked intentions of the Defendants herein, executed during their lubricious attempt to question the legitimacy of President Joseph Biden's win in Pennsylvania – an effort utterly bereft of any evidence in support thereof, as stated by a number of state and federal courts in Philadelphia and Pennsylvania.

Mr. Savage has been harmed by these false statements and insinuations in that they have depicted Mr. Savage as a dishonest criminal, lowered his standing in the estimation of his community and with his peers, and devastated him personally. The Defendants' media campaign on television, on social media, and in press conferences, as further set forth herein at length, has disparaged Mr. Savage on a local and national level. Further, the Defendants' actions have permanently damaged Mr. Savage's reputation and his ability to succeed in his chosen profession. Moreover, due to the nature of the accusation being mounted by Defendant Trump and his supporters, and the threats to other election officials that are targeted by Defendant Trump, Mr. Savage now has an eminently reasonable fear for his life and for that of his family, given the Defendants' documented proclivities for fostering violence, and the threats that were actually received by the Plaintiff himself in the aftermath of the Defendants false statements and/or insinuations about the Plaintiff, as further set forth herein at length *infra*.

PARTIES

1. Plaintiff James Savage (hereinafter “Plaintiff” or “Mr. Savage”) is an adult individual regularly conducting business at 403 E. 24th Street, Chester, PA 19013.
2. Defendant Donald J. Trump (hereinafter “Trump”) is an adult individual who at any and all times relevant herein was regularly conducting business at and/or carrying on a continuous and systematic part of his general electioneering and/or political campaign business within this Commonwealth at 2100 Byberry Road, Philadelphia, PA 19116, and/or during his testimony before a special subcommittee of the Pennsylvania legislature in Gettysburg, PA on November 25, 2020, and/or otherwise generally conducts business at 725 Fifth Avenue, New York, New York 10022, and/or is currently residing at 1100 South Ocean Boulevard, Palm Beach, Florida 33480.
3. Defendant Rudolph W. Giuliani (hereinafter “Giuliani”) is an adult individual who at any and all times relevant herein was regularly conducting business and/or carrying on a continuous and systematic part of his practice of law and/or general legal advocacy business and/or electioneering and/or political campaign business within this Commonwealth at 2100 Byberry Road, Philadelphia, PA 19116, and/or resided at and/or is currently residing at 45 East 66th Street, Apt. 10W, New York, NY 10065. At any and all times relevant, as further set forth herein at length, Defendant Giuliani was an agent, workman, servant and/or employee of Defendants Trump *supra* and/or Donald J. Trump for President, Inc. *infra*, and/or Defendant Rudolph Giuliani, PLLC *infra*, particularly during his testimony before a special committee of the Pennsylvania legislature in Gettysburg, PA on November 25, 2020.
4. Defendant Donald J. Trump for President, Inc. (hereinafter “DJTFP”) is a New York non-profit corporation which at any and all times relevant herein was regularly conducting business

and/or carrying on a continuous and systematic part of its general electioneering and/or political campaign business within this Commonwealth at 2100 Byberry Road, Philadelphia, PA 19116 and/or 1420 Locust Street, Suite 200, Philadelphia, PA 19102, and/or is currently conducting business at 725 Fifth Avenue, New York, New York 10022, and also conducted such business in this Commonwealth on November 25, 2020, with its presentation of the testimony of Defendants Trump and Giuliani, *supra*, and/or Defendants Jenna Ellis, Leah Hoopes, and Gregory Stenstrom, *infra*, before a special committee of the Pennsylvania legislature in Gettysburg, PA on November 25, 2020.

5. Defendant Rudolph W. Giuliani, PLLC (hereinafter “Giuliani PLLC”) is an a New York domestic professional service limited liability company, which at any and all times relevant herein was regularly conducting business and/or carrying on a continuous and systematic part of the practice of law and/or general legal advocacy business and/or electioneering and/or political campaign business and/or the provision of Defendant Giuliani for all of the aforementioned, on behalf of Defendants Trump and/or DJTFP within this Commonwealth, at 2100 Byberry Road, Philadelphia, PA 19116, and/or 45 East 66th Street, Apt. 10W, New York, NY 10065 and/or 445 Park Avenue, Suite 18A, New York, NY 10022. At any and all times relevant, as further set forth herein at length, Defendant Giuliani PLLC was an agent, workman, servant and/or employee of Defendants Trump, DJTFP, and Giuliani, particularly during Defendant Giuliani’s testimony before a special subcommittee of the Pennsylvania legislature in Gettysburg, PA on November 25, 2020.

6. Defendant Jenna Ellis (hereinafter “Ellis”) is an adult individual regularly conducting business at 309 W. Washington Street, Suite 1250, Chicago, Illinois, 60606. At any and all times relevant, as further set forth herein at length, Defendant Ellis was an agent, workman, servant

and/or employee of Defendants Trump, Giuliani, DJTFP, Giuliani PLLC, *supra*, and/or Defendants Phillip Kline and/or The Thomas More Society, *infra*, particularly during her testimony before a special subcommittee of the Pennsylvania legislature in Gettysburg, PA on November 25, 2020.

7. Defendant Gregory Stenstrom (hereinafter “Stenstrom”) is an adult individual residing at 1541 Farmers Lane, Glen Mills, PA 19342. At any and all times relevant and as further set forth at length *infra*, Defendant Stenstrom was an agent, workman, servant and/or employee of Defendants Trump, Giuliani, DJTFP, and/or Giuliani PLLC *supra*, particularly during his testimony before a special subcommittee of the Pennsylvania legislature in Gettysburg, PA on November 25, 2020, and/or was an agent, workman, servant and/or employee of Defendants Phillip Kline, and/or the Thomas More Society *infra*, particularly during his presentation in a press conference held by Defendants Phillip Kline and/or the Thomas More Society in Arlington, VA on December 1, 2020, as further set forth herein at length.

8. Defendant Leah Hoopes (hereinafter “Hoopes”) is an adult individual residing at 241 Sulky Way, Chadds Ford, PA 19317. At any and all times relevant and as further set forth at length *infra*, Defendant Hoopes was an agent, workman, servant and/or employee of Defendants Trump, Giuliani, DJTFP, Giuliani PLLC and/or the Thomas More Society, particularly during her testimony before a special committee of the Pennsylvania legislature in Gettysburg, PA on November 25, 2020.

9. Defendant Phillip Kline (hereinafter “Kline”) is an adult individual regularly conducting business at 1971 University Boulevard, Lynchburg, VA 24515 and/or 309 W. Washington Street, Suite 1250, Chicago, Illinois, 60606. At any and all times relevant herein, Defendant Kline was an agent, servant, workman, and/or employee of Defendants Trump, Giuliani, DJTFP, and/or

Giuliani PLLC *supra*, and/or Defendant The Thomas More Society *infra*, in his role as director of the Amistad Project of Defendant The Thomas More Society, and particularly during his presentation in a press conference which he conducted in Arlington, VA on December 1, 2020, as further set forth herein at length.

10. Defendant The Thomas Moore Society (hereinafter “TMS”) is an Illinois non-profit corporation, operating as non-profit “public interest” law firm with an address of 309 W. Washington Street, Suite 1250, Chicago, Illinois, 60606. At any and all times relevant herein, Defendant TMS was an agent, servant, workman, and/or employee of Defendants Trump, Giuliani, DJTFP, and/or Giuliani PLLC, particularly with the assistance it provided to Defendants Hoopes and/or Stenstrom and/or Giuliani in their testimony before a special committee of the Pennsylvania legislature in Gettysburg, PA on November 25, 2020, and/or its presentation of Defendants Kline and Stenstrom in a press conference which Defendant TMS conducted in Arlington, VA on December 1, 2020, as further set forth herein at length.

11. All parties other than Plaintiff are collectively referred to as the “Defendants.”

JURISDICTION AND VENUE

12. This Court has subject matter jurisdiction over this matter pursuant to 42 Pa.C.S.A. § 931(a) and has personal jurisdiction pursuant to 42 Pa.C.S.A § 5301, as some of the Defendants are domiciled in Pennsylvania. The Court has personal jurisdiction over the Defendants that are not domiciled in Pennsylvania pursuant to 42 Pa.C.S.A § 5322, as Defendants caused harm and tortious injury in this Commonwealth by an act or omission inside this Commonwealth, and/or an act or omission made outside of this Commonwealth while conducting business and/or consenting to the jurisdiction of this Commonwealth, as further set forth herein at length.

13. Venue is proper in Philadelphia County pursuant to Pa.R.C.P. §2156(a) as the defamatory statements at issue, as further set forth *infra* at length, were published by Defendant(s) from their regular places of business in Philadelphia, and/or were issued by the Defendants in their business pursuit of falsely publishing allegations of voter fraud in and around Philadelphia, and were published, read, and understood in Philadelphia County and by a resident and/or residents of Philadelphia County.

14. Jurisdiction and venue are particularly suitable in Philadelphia for the following reasons, to wit:

A) Defendants Trump and/or DJTFP knowingly and intentionally subjected themselves to the jurisdiction and venue of the Philadelphia Court of Common Pleas by virtue of the operation of their Philadelphia headquarters for their 2020 Presidential campaign at 2100 Byberry Road, Philadelphia, PA 19116;

B) Defendants Trump and/or DJTFP knowingly and intentionally availed themselves of the jurisdiction and venue of the Philadelphia Court of Common Pleas with the filing of at least six (6) lawsuits¹ within the approximate course of the past year; and,

C) Defendants Trump, DJTFP, Giuliani and/or Giuliani PLLC conducted a press conference at Four Seasons Total Landscaping, at 7347 State Road, Philadelphia, PA 19136 on November 7, 2020, in pursuit of their general electioneering and/or political campaign business and/or legal advocacy during the 2020 Presidential campaign, which was the public genesis of their concerted, intentional and wicked pattern of deceitful and

¹ See In re: Canvass of Absentee & Main-In Ballots 2020, Phila. C.C.P., Nos. 201100874, 201100875, 201100876, 201100877, and 201100878, all of which were filed on November 10, 2020, with the Prothonotary of the Philadelphia Court of Common Pleas, by Defendants Trump and/or DJTFP and/or other Defendants herein, with their address therein c/o Linda A. Kerns, Esq., 1420 Locust Street, Suite 200, Philadelphia, PA 19102. See also Donald J. Trump For President, Inc. v. Philadelphia County Board of Elections, et. al., Phila. C.C.P., Sept. 2020, No. 2035.

meritless lies concerning allegations of ballot tampering and interference with vote tabulations, ultimately culminating in their liability to the Plaintiff, as further set forth herein at length.

FACTS

15. Plaintiff hereby incorporates averments 1 through 14 as though fully set forth herein at length.

16. At any and all times relevant herein, including during the election of November 3, 2020 (hereinafter “the election”), Plaintiff was employed as the Supervisor/Chief Custodian of the Delaware County Voting Machine Warehouse, located at 403 E. 24th Street, Chester, PA 19013, in Delaware County, Pennsylvania.

17. The Delaware County Voting Machine Department manages the storage, security, programming, testing, and delivery of all voting equipment in Delaware County, for which the Plaintiff was solely responsible as the Supervisor/Chief Custodian.

18. As is well known by poll watchers and election officials, the Plaintiff’s employment does **not** endow the Plaintiff with the ability to count ballots or conduct vote tabulation in any election, whatsoever; instead, Plaintiff is only responsible for the storage, security, programming, testing and delivery of all the voting equipment in Delaware County.

19. Among the political races at issue during the election was the contest between President Joseph R. Biden and Defendant Trump, for the office of President of the United States.

20. According to the most recent tally from the Pennsylvania Department of State, on November 3, 2020, President Biden defeated Defendant Trump by 80,555 votes, a true and correct copy of which is attached hereto and incorporated herein as Exhibit A.²

21. In the weeks and months leading up to the election, and/or beginning immediately thereafter and as further set forth herein at length *infra*, Defendants Trump, Giuliani, DJTFP, Giuliani PLLC, Ellis, Kline and/or TMS engaged in a perfidiously concerted and wicked plan to knowingly and intentionally publish hollow and/or false and/or baseless and/or vacuous claims of voter fraud, election fraud, and/or vote tampering, with the express purpose of creating mass political confusion and social unrest in the City of Philadelphia and/or the Commonwealth of Pennsylvania, in particular (hereinafter “fabricated fraud allegations”), and throughout the United States in general.

22. Defendants Trump, Giuliani, DJTFP, Giuliani PLLC, Ellis, Kline and/or TMS’s fabricated fraud allegations were centered on the conduct of the election and election officials in Pennsylvania in general, and in Philadelphia specifically, and about the Plaintiff herein, in particular, as further set forth *infra* at length.

23. To those end(s) and in support of their fabricated fraud allegations, upon information and belief, Defendants Trump, Giuliani, DJTFP, and/or Giuliani PLLC filed a number of lawsuits and/or entered their appearances and advocated in the same, in both state and federal courts throughout Pennsylvania (including in Philadelphia), and each and every instance thereof was bereft of any merit whatsoever.

² In Pennsylvania, President Biden received 3,458,229 votes, and Defendant Trump received 3,377,674 votes, a difference of 80,555 votes.

24. Defendants Trump, Giuliani, DJTFP, and/or Giuliani PLLC published their fabricated fraud allegations, and/or availed themselves of pursuing meritless litigation in the state and federal courts of Pennsylvania, while conducting business at 2100 Byberry Road, Philadelphia, PA 19116 (which was the headquarters for said Defendants' political activities and electioneering in the City of Philadelphia and/or the Commonwealth of Pennsylvania, during the election at issue) and/or simultaneously availed themselves of the jurisdiction of the Philadelphia Court of Common Pleas, as set forth in the lawsuit filed by Defendant DJTFP at Donald J. Trump For President, Inc. v. Philadelphia County Board of Elections, et. al., Phila. C.C.P., Sept. 2020, No. 2035.³

25. As aforementioned, Defendants Trump, Giuliani, and Giuliani PLLC (in general) and Defendant DJTFP (in particular) availed themselves of the jurisdiction of the Philadelphia Court of Common Pleas with at least six (6) lawsuits which they filed in pursuit of their fabricated fraud allegations in the City and County of Philadelphia.⁴

26. Defendants Trump, Giuliani, and/or Giuliani PLLC (in general) and/or Defendant DJTFP (in particular) availed themselves of at least one (1) federal lawsuit filed in the City of Philadelphia, as well, at Donald J. Trump for President, Inc. v. Philadelphia County Board of Elections, E.D.Pa., No. 20-cv-5533, filed November 5, 2020, and at least one (1) federal lawsuit filed in the M.D.Pa., at Donald J. Trump For President, Inc., et. al. v. Kathy Boockvar, et. al., No. 4:20-cv-02078.

³ A true and correct copy of the October 9, 2020 order and opinion from Judge Glazer, denying the relief sought by Defendant DJTFP therein, is attached hereto and incorporated herein as Exhibit B, which was affirmed by the Commonwealth Court of Pennsylvania on or about October 23, 2020, at 983 CD 2020.

⁴ See Footnote 1, *supra*.

27. At the risk of belaboring the point, Defendants Trump, Giuliani and Giuliani PLLC (in general) and Defendant DJTFP (in particular) have extensively conducted their electioneering and/or political activity and/or campaign activity and/or legal advocacy and/or their fabricated fraud allegations in Philadelphia⁵, and/or pursued multiple lawsuits (filed in state and federal courts within Philadelphia and/or Pennsylvania) in support of the same.

The Gettysburg Hearing

28. While all of these lawsuits, in pursuit of fabricated fraud allegations, were pending in Philadelphia and Pennsylvania, and/or in concerted furtherance of the pestilential and/or false allegations made therein, Defendants Trump, Giuliani, DJTFP, Giuliani PLLC, Ellis, Hoopes, Stenstrom, Kline, and TMS individually and/or collectively orchestrated and/or participated in an intentional endeavor of slander and/or libel that was specifically directed against the Plaintiff herein, during a Pennsylvania Senate Republicans Conference, that was held in Gettysburg, Pennsylvania, on November 25, 2020 (hereinafter “the Gettysburg hearing”)^{6,7} as further set forth at length *infra*.

⁵ These activities include, but are not limited to, Defendants Giuliani and Giuliani PLLC’s infamous press conference on behalf of Defendants Trump and DJTFP, which was conducted at Four Seasons Total Landscaping, located at 7347 State Road, Philadelphia, PA 19136, on November 7, 2020. Defendant Giuliani began his remarks that day in the City of Philadelphia, with Defendant DJTFP campaign manager Corey Lewandowski at his side, by saying, “Thank you for coming. So I’m here on behalf of the, on behalf of the Trump campaign, as an attorney for the President, to describe to you, the first part of a situation that is extremely, extremely troubling, first of all for the state of, Commonwealth of Pennsylvania, and then for a number of other states, and these lawsuits will be brought, starting on Monday, but the first time it was discovered was here in Pennsylvania just a couple of days ago.” Defendant Giuliani’s remarks can be seen at <https://www.youtube.com/watch?v=LWigM3lfYsI>, and this press conference in Philadelphia was also advertised by Defendant Trump on his Twitter account.

⁶ See <https://www.c-span.org/video/?478422-1/president-trump-tells-pennsylvania-gop-lawmakers-election-rigged-overturnd>, a true and correct copy of which shall be provided to the Court and/or all counsel, and incorporated herein, as Exhibit C, and presents a rear view of the testimony provided at the Gettysburg hearing.

⁷ See <https://thehill.com/video/campaign/527599-watch-live-pennsylvania-gop-holds-hearing-on-voter-fraud-with-giuliani-trump>, a true and correct copy of which shall be provided to the Court and/or all counsel, and incorporated herein, as Exhibit D, and presents a front view of the testimony provided at the Gettysburg hearing.

29. The Gettysburg hearing was chaired by State Senators David G. Argall and/or Doug Mastriano, and Defendants Trump, Giuliani, DJTFP, Giuliani PLLC, Ellis, Hoopes, and Stenstrom were present as panelists to testify at the same, either in person and/or via telephone. See Exhibits C and D.

30. After opening statements by Argall and Mastriano, Argall then advised Defendants Trump, Giuliani, DJTFP, Giuliani PLLC, Ellis, Hoopes, and Stenstrom as follows, at Exhibit C beginning at 14:42:

“Also my job as chairman is to remind our panelists to keep their microphones muted until it is your turn to speak...one other reminder to our senators and witnesses at the request of our Senate attorneys: this IS a legislative hearing. Our purpose is to listen to the complaints of our constituents, the oversight of government agencies, and the need for possible legislation. We all need to conduct ourselves accordingly.”

See Exhibit C, 14:42. See also Exhibit D.

31. Defendants Trump, Giuliani, DJTFP, Giuliani PLLC, Ellis, Hoopes and Stenstrom did not conduct themselves accordingly, nor heed the warning provided by State Senator Argall and/or the attorneys for the Pennsylvania Senate, as further set forth *infra*.

32. Defendant Giuliani began his opening remarks at the Gettysburg hearing as set forth in Exhibit C at 15:53, whereupon shortly thereafter he said as follows, beginning at 18:02:

“This voter fraud that took place, which as you will see from the witnesses that we call, had several dimensions to it, several different ways in which it was done. The most dangerous thing is it is very, very similar in at least six states that we’ve been able to study. In other words, what we’re going to describe to you with these witnesses happened in roughly the same way in Michigan, Wisconsin, Nevada, Arizona, and Georgia. Primary device were the mail in ballots...

(19:44) This was a terrible mistake, and it allowed the leadership of a party that had become pretty expert at voter fraud to really go wild. So, the witnesses we present are going to first show you that in the case of Philadelphia and in the case

of Allegheny County **and one or two other counties**, the mail in ballots that were received were not inspected at all by any Republican. They were hidden from Republicans. In the case of Philadelphia and Allegheny County, I can't be absolutely certain, but I do believe the witnesses will show that a Republican never got to see a single ballot. Now you know how important that is to determining whether it is a valid ballot or not...

(21:38) Think about this. In your state, Republicans were uniformly not allowed, kept out, put in chutes, like they were cows, to keep them away from seeing these ballots. Never happened before....what's the chance that on the morning of November 3rd or 4th when they started the count, **that in each one of those places**, the Democrat leadership of these highly controlled Democrat cities, that have some history for corruption, and in the case of Philadelphia a long history of voter fraud, I could show you the convictions, I don't think I have to, uh, what are the odds that they're all gonna wake up with the same idea? After years and years of always examining together absentee ballots, all of sudden, in a year in which we have a couple million of them per state, we're not gonna allow any Republicans to see them. The person in Philly figures that out, Pittsburgh, Detroit, Milwaukee, Las Vegas Nevada. **Or is it more likely that this was a common plan? That maybe started with the whole idea of having mail ballots because it gives you a much wider range to cheat.** When you had just a small number of absentee ballots, like 400,000, you have a certain range that you can cheat. When you have 250, or 2.5 million, you have a much bigger range to do that. So when you that testimony about not being allowed to see the ballot, you have to understand it's much more important than just that individual, just that individual ballot.

(23:31) On election night, when I went to sleep, maybe when you did, President Trump was leading in your state by somewhere around 700 to 800,000 votes, depending on when you went to sleep. That's a huge number of votes. 65% of the vote had been cast. Under normal circumstances, like if this were a fair media, your state would have been called for Trump. I mean, Virginia was called with 10% of the vote...

(24:14) **What are the odds that they all switched? Overnight? They just switched, by the next day. I think you're gonna see how that, I think you're gonna see how that happened,** and I think there are a couple of statistics that you have to really closely, you have to really closely look at. I'll just mention them, and then we'll move on to the witnesses. We have calculated and the evidence will show, that there were 682,770 mail in ballots that were entered into your votes in just Allegheny County and in Philadelphia that were not observed by any single Republican. Those ballots could have all been for Joe Biden, they could have all been for someone else, they could have had no identifying data, they could have been from the same person. There could have been multiples of them, there could have been no name on them. We have no idea if that's true, and it will be very hard now to kinda put em together. We could ask and you could

subpoena all of the outer envelopes. It would be very interesting to take a look at the 682,770 outer envelopes, it'd be very interesting if they were kept, and it'd be very interesting to see how many of them weren't filled out. But in any event, under the law of your state, which is set by you, those ballots are illegal. The judge mistakenly in his opinion said that we want to disenfranchise 6,000,000 people. We don't want to disenfranchise anyone. We want to disqualify 682,000 votes so that 74 million people are not disenfranchised. **Because that's what happened by the cheating that went on here.**

(26:03) I'll give you one other enormously puzzling statistic. You sent out in the state of, Commonwealth of Pennsylvania, 1 thousand 823 148 absentee or mail in ballots. You received back 1.4 million approximately. However, in the count for president, you counted 2.5 million. I don't know what accounts for that 700,000 difference between the number of ballots you sent out and the number of ballots that ended up in the count. That number, 2,589,242, was on your government website until yesterday. And yesterday it was removed without explanation. I'm gonna be very interested in hearing what the explanation is, and I can't imagine you could possibly certify it without knowing the explanation to that, as well as the explanation to the 22,686 mail in ballots that were returned on the day they were mailed. That's a trick. How about they were returned, how about 32,591 were returned the day after they were mailed? Another 20,000 were returned (chuckle) before they were mailed. Of course, this is only, this is only, I think this is a kind of a low count, and I guess the crooks in Philadelphia are disappointed in this, they only submitted 8,021 ballots from dead people. Mail in ballots for dead people. It's probably easier for dead people to submit mail in ballots than it is to vote in person. You had about 30,000 of those. We're checking the records of the cemeteries around Philadelphia. You have 4,984 mail in ballots that were never requested, and on and on and on and on.

Your election, because of these two counties **and maybe one other, is a sham. It's a disgrace, to your state.** And finally, I don't need to remind you of this, I think I need to remind America of this. The election for president of the United States is not run by the governor of your state. It's not run by your election commissioner. The United States Constitution makes it clear who has the responsibility for running this election. Article 2, Section 1, clause 2 of our Constitution doesn't say that ABC gets to call the winner, or CNN. It says...each state shall appoint in such manner as the legislature thereof may direct a number of electors. It's the state legislature that controls this process. It's your power. It's your responsibility. And uh, I think you know, and you have to convince the rest of your members, Republican and Democrat, they owe that to the people of your state, and they owe that to the people of the United States, because if this happens without consequence, if they can just enter 600,000 some odd mail in ballots without allowing a single Republican to view it, what's to say that next time they won't do a million, or two million? I know crooks really well. You give em an inch and they take a mile, and you give em a mile, and they take your whole country. **So now we'll proceed with the witnesses.** (29:56)"

See Exhibit C, 18:02 to 29:56 (**emphasis added**). See also Exhibit D.

33. Defendant Ellis began her remarks at the Gettysburg hearing as set forth in Exhibit C at 30:53, whereupon she said as follows:

“Thank you very much. And, em, I’ll reserve my comments for the end, **and I would just echo, uh, everything that the Mayor so eloquently stated.**”

See Exhibit C, 30:53 (**emphasis added**). See also Exhibit D.

34. Defendant Hoopes began her remarks at the Gettysburg hearing as set forth in Exhibit C at 41:57, whereupon she said as follows:

“First and foremost, excuse me, my name is Leah Hoopes, I’m from Delaware County, Pennsylvania. I was a poll watcher on the day of election and I was also present at the counting center in Chester, Pennsylvania....To our fearless and brave president, thank you for being our shield and putting us first and I am forever grateful. **It is an absolute honor to be a part of this hearing and to finally have an opportunity to speak about what took place in Delaware County, Pennsylvania.** I feel as an American that it is my duty to protect the integrity of our elections not just for me but for every American. There are many who have lost life and limb for my right to vote...

(42:45) Four years ago, Donald Trump came down an escalator and I knew that he was here to take back our country...I was born and raised in Delaware County...I was taught from an early age...by all means, always speak the truth. I took those values throughout my life and applied them in every avenue possible. Which brings me up to the present...

(43:20) I also started volunteering for the Trump campaign...During this time, I started a watchdog group, and reached out to the Thomas Moore Society. Now associates we have been focusing our efforts in election integrity. Our greatest efforts have been in following closely...the Democrat majority election board. **This also includes any and all contractors, support staff, and any key players involved. What we found was actually concerning...**

(44:19) **Let’s also make note that the voting machine warehouse supervisor is a Bernie Sanders delegate who was also solely responsible for every scanner, machine, v-card, and all machines with absolutely zero experience in this area...**

(45:22) Let me explain to you the layout of the counting center. It is in the middle of a huge parking lot...The counting center was on the first floor...I was there for three straight days. What became of concern was the back room which had no observers, no line of sight or transparency into the process. There was no cooperation, complete resistance from election night and every day after. It took until our lawyer got an injunction to get into that back room in which pre-c canvassing was transpiring. Even with an injunction, which was a joke, we were granted five minutes every two hours, and the set up was sitting in a chair, twenty feet from any physical ballot...We have stuck our necks out, have been intimidated, threatened, bullied, have spent countless hours away from our families, friends and jobs. **We have signed affidavits under penalty of perjury which should be consideration enough to know that this is a very serious issue.** I'm here for one thing only, and that is to speak the truth...I hope this committee takes action if needed **and justice will be swift to anyone involved in fraudulent activity...**

(47:28) Thank you. Without election integrity, we are just another banana republic. (47:32)”

See Exhibit C, 41:57 through 47:32 (**emphasis added**). See also Exhibit D.

35. As aforementioned, Defendant Hoopes described the Plaintiff as having “absolutely zero experience” despite being in charge of the USB v-cards.

36. While Defendant Hoopes’ intent was clearly to disparage the Plaintiff, she was factually accurate that the Plaintiff would not have been trained or experienced in uploading votes for influencing tabulation purposes, improperly or otherwise.

37. Accordingly, Defendant Hoopes – and every Defendant herein at the Gettysburg public meeting on November 25, 2020 – was aware that any suggestion that the Plaintiff could upload votes for influencing tabulation purposes was impossible.

38. Defendant Hoopes’ aforementioned specific statements in averment 34, particularly at 44:19 that **“Let’s also make note that the voting machine warehouse supervisor is a Bernie Sanders delegate who was also solely responsible for every scanner, machine, v-card, and all machines with absolutely zero experience in this area”** were specifically about Plaintiff

herein, who was the only voting machine warehouse supervisor in Delaware County at the time of Defendant Hoopes' statements in those aforementioned regards.

39. Defendant Stenstrom began his remarks at the Gettysburg hearing as set forth in Exhibit C at 47:47, whereupon he said as follows:

“Tough group to follow. My name is Gregory Stenstrom, I’m from Delaware County. I’m a father, a family man, I was a former commanding officer, an executive officer in the Navy. I’m a veteran of foreign wars. I’m the CEO of my own private company. I’m a data scientist. I’m a forensic computer scientist, and I’m an expert in security and fraud. Leah had recruited me uh for this election, um and uh I was glad I uh...thank you for that. So, for the first part of the day, I was a poll watcher in the city of Chester, and uh I was with just another former U.S. Marine officer, and uh the two of us were the only GOP poll watchers uh in the city of Chester, which is about 40,000 people. Uh, because of the consolidation for Covid, uh there were seven polls we were allowed to, you know, that we were able to make it to in 22 precincts. What we saw out there was pretty orderly, um and uh exciting. People were excited to vote. One of the things we saw out in the field was that people, uh quite a few people had done mail in ballots. So they came in and they hadn’t uh been updated in the Delaware County database yet. So they would come in and say, “I, you know, the database is not showing me on the database, I’d like to vote.” So the process, uh one of the processes was, to uh give them a uh a provisional ballot, and uh then they would vote provisionally, and then later on their vote would be sorted out. Um, that didn’t happen. Uh, I observed and the gentlemen that was with me observed uh seven different polls where the people were given a regular ballot. So they cast a vote and put it in. You know, we let it happen a few times, you know, we didn’t jump all over them, you know, happened a couple of times, we went up, uh in all cases the election judges were very forthcoming, um very polite, they apologized and they said they couldn’t do it. But that uh somewhat spurred me to go down to the counting center which Leah described...and I wanted to take a look. All day long I had been told that um there were ten to twenty GOP poll watchers down there and that everything was well in hand. And out of curiosity, I decided to go down. I arrived at six o’clock, um with four other gentlemen, again former military and some good citizens from Delaware County, and uh we weren’t allowed to get in until uh 11 o’clock at night. And we had to get some um legal help to get us in. So it took us five hours to get upstairs.

Um, after that, um, you know, what we saw here is, uh what I saw is I really think the crux of this in Delaware County is, uh, as an expert in this, I think it’s impossible to verify the validity of about 100,000 to 120,000 votes. Now, Delaware County’s got 425,000 registered voters. Approximately 300,000 of them voted...But of that number, over 100,000 are in question in my mind. **What I saw as a forensics expert was an election process that was forensically**

destructive in the manner it was conducted, with the envelopes being separated from the ballots and gone to the other side of the room. And the problem with that from being forensically destructive, is that when you go to do a recount, okay, the machines did a pretty good job of recounting, so if I have 120,000 ballots, mail in ballots at one side of the room, and envelopes at the other side of the room, it's still gonna come out 102,000 votes for President, uh Vice President Biden, and 18,000 votes for President Trump. I don't care how many times you recount those votes, you know, the ballot's gonna come out the same every time. So the notion of a recount in a forensically destructive process is, uh, doesn't work very well.

Um, what we saw there, what I saw there was a chain of custody in all cases it was broken. It was broken for the mail in ballots, the drop box ballots, the election day USB v-card flash drives, in all cases the chain of custody and the procedures that were defined by the Delaware County Board of Elections and election process review, were all they didn't follow one...

(52:30) **So I personally observed uh USB v-cards being uploaded to the voting machines by the uh, the uh voting machine warehouse supervisor on multiple occasions. I saw this personally.** I brought it to the attention of the deputy sheriff who was there stationed who was a senior law enforcement officer, and I brought it to the attention of the clerk of elections. Um I brought it to their attention I objected, and I said, uh, **"This person is not being observed, he's not part of the process that I can see, and he's walking in with baggies which we have pictures of, and that were submitted in our affidavits, and he was sticking these USBs into the machines. So I personally witnessed over that happen twenty four times, over twenty four times. Um we have multiple other witnesses who saw it including Democrat poll watchers.** And we were told, uh I was told the next day uh by uh the uh solicitors, actually not the solicitor but the attorney that we had secured, that they said every election they leave a couple of USBs in the voting machines and they're brought back and generally the warehouse manager comes over and puts them in. So in talking to US Attorney General McSwain and other uh law enforcement officers uh I found out that was not the case. That generally uh, you know, more than more than two is unusual. **So they denied they did it, but um as of today 47 USB v-cards are missing, and they're nowhere to be found. So I was told personally that these 32 these 24 to 30 cards that were uploaded um weren't there, those cards I demanded that they, they didn't update the vote live time, they only updated it about once every two or three hours, I demanded they updated the vote so I could see what the, the uh, what the what the result was, and it was uh 50,000 votes. And I think as a computer scientist, an American, and a patriot, it doesn't matter who those 50,000 votes were. I'll tell you they were for Vice President Biden, but what was shocking to me, as an American, as someone who has uh gone to sea, gone to war, that um that could even happen.** So several other things that uh came up was on Thursday it took us three days for them to obey the court order that I secured with Leah's help **and the help**

of the Thomas Moore Society uh who we thank, incredibly uh good patriots, they got us in there, they got the order for us to get in and watch uh look at the back offices which were locked uh for five minutes every two hours. I went in I was the first one allowed to go in at 1:30 on Thursday and then again at 3:30 for five minutes. The uh county solicitor had a stop watch, on the first time I was not allowed to touch anything, the second time I did. What I observed in the locked room in the back office was 70,000 unopened mail in ballots. They were in boxes of 500, stacked in neatly. The gentlemen that came in with me is a, was a uh Democrat poll watcher, is a forensic pathologist, a very detailed, very dedicated man and he took meticulous notes as well. And I verified with him, "Are you seeing what I'm seeing?" We both agreed as GOP poll watchers and a Democrat poll watcher that we had uh witnessed 70, 60 to 70,000, we had a little bit of a disagreement there. The problem with that was by that time, the mail in ballots had already been counted. So 120,000 mail in ballots had already been counted, posted, and done, so my question is where did the 70,000 ballots go? And nobody knows. We have a picture in here of a large number of boxes that I took that were filled with what appeared to be ballots, sitting by the Bluecrest machine, they were there for about three hours, and then they disappeared. I found it notable when I watched it the first when they were taking the ballots up and down, I said "I am an expert in fraud." I saw the ballots going up multiple elevators and racks, and I think a lot of well meaning people and a lot of honest people were there doing that. **They were trying to participate in the process, and I would say that uh 99% of the people there uh the way the process was designed, I believe, that people thought it was a non-fraudulent process.** I heard that said many times. I was uh you know, I said, "there's no fraud going on here" I said "well, I'm not, you know I didn't even bring that up," **but I think people saw what they wanted to see, and they saw what was intended for them to see.** I called it at one point kabuki theater. I said it was all designed for us to see it, it was entertaining, there were cameras on it. When we finally got into the back room where the votes were being ingested, as a data scientist I want to see where the data's coming in, and I wanted to know the universe of the votes, well the universe of the votes was only supposed to be 120,000 mail in ballots, we were told there were 6,000 ballots remaining, so I said okay we have a universe of 126,000 votes, and then when I get back there the universe wasn't 126,000 votes, the universe was 200,000 votes. So that's a problem.

I think the last thing I wanted, a couple of other things is the Bluecrest sorter machine was only manned by one person. **You know, people ask me all the time, "how do people commit crimes," um I know there's a lot of theories here and I always look for the simplest thing. People that stuff, you know, sticking USB sticks in, putting ballots in, very simple thing.** Only takes a couple of people. Doesn't take a big conspiracy. I think people look at things and they use inflammatory words and uh you know like fraud and so forth. As a forensic computer scientist, my interest is in the data, where did it go, where did the spoilage go, how did the data come in and go out of the system. So I think as a scientist we need to look at that, we need to audit that. What was really

upsetting to me, the most upsetting, was I had um spoke to multiple law enforcement agencies, and literally begged uh multiple law enforcement agencies to say “Go in” and I said in order to prove, you know, prove that nothing’s happening, you either exonerate yourselves from the process or refute what I’m saying, please, it’s very simple process. Just go get the forensic evidence from the computers. It’s a simple process. You take the, you turn the computer off, it’s non-destructive. It takes moments, maybe half an hour, twenty minutes, to do it properly and collect the evidence. You open the computer up, you take a a device called a bitblocker. You put it in the hard drive, it’s done under the observation of law enforcement officers. They take a forensic image of the drive, put it all back together. It wouldn’t have taken more than an hour to image all five machines. That was never done. Despite my objections and that was three weeks ago. Lastly, when they said, they said well we’ve got all the forensic records and so forth. We just learned two days ago that virtually all chain of custody logs, records, yellow sheets, everything was gone. All forensic evidence, all custody sheets in Delaware County are gone. They had a signing party where they sat down, and and poll workers were invited back to recreate those logs, and our understanding as of today was that they were unsuccessful in getting them all. **So we have a situation where we have 100,000 ballots to 120,000 ballots, both mail in and USB, that are in question.** Now there’s no cure for this. There’s no remedy for this. As a home charter, we can we could have a re-election in Delaware County for our own representatives within our own town, but there’s no cure for that for the president of the United States. And I don’t believe as a citizen and an observer to this that anybody could certify that vote in any good conscience. And if the Democrats that have a part of this process, you know, were so, had done things, followed their own procedure which they created almost unilaterally, we would be in a situation where they could exonerate themselves, and they could say, “Mr. Stenstrom, you’ve been misinformed. We have evidence here that refutes what you say.” But that’s not the case, they can’t do that. So I say if you can’t certify that vote, and you can’t certify 100,000 votes out of 300,000, then you can’t certify Delaware County. And I’m done and thank you for your time and impatient.”

See Exhibit C, 47:47 through 1:02:04 (**emphasis added**). See also Exhibit D.

40. Defendant Stenstrom’s aforementioned specific statements in averment 39, particularly beginning at 52:30 that:

“So I personally observed uh USB v-cards being uploaded to the voting machines by the uh, the uh voting machine warehouse supervisor on multiple occasions. I saw this personally...This person is not being observed, he’s not part of the process that I can see, and he’s walking in with baggies which we have pictures of, and that were submitted in our affidavits, and he was sticking these USBs into the machines. So I personally witnessed over that happen twenty four times, over twenty four times. Um we have multiple other witnesses who saw it including Democrat poll watchers...So they

denied they did it, but um as of today 47 USB v-cards are missing, and they're nowhere to be found. So I was told personally that these 32 these 24 to 30 cards that were uploaded um weren't there, those cards I demanded that they, they didn't update the vote live time, they only updated it about once every two or three hours, I demanded they updated the vote so I could see what the, the uh, what the what the result was, and it was uh 50,000 votes. And I think as a computer scientist, an American, and a patriot, it doesn't matter who those 50,000 votes were. I'll tell you they were for Vice President Biden...You know, people ask me all the time, "how do people commit crimes," um I know there's a lot of theories here and I always look for the simplest thing. People that stuff, you know, sticking USB sticks in, putting ballots in, very simple thing. So we have a situation where we have 100,000 ballots to 120,000 ballots, both mail in and USB, that are in question."

were specifically about Plaintiff herein, who was the only voting machine warehouse supervisor in Delaware County at the time of Defendant Stenstrom's statements in those aforementioned regards.

41. With the assistance of Defendant Ellis (via her cell phone), Defendant Trump began his remarks at the Gettysburg hearing as set forth in Exhibit C at 2:06:16, whereupon he said as follows:

"I really appreciate being asked to speak. I'm in the oval office right now.,,This was an election that we won easily, we won it by a lot...So this was a uh, very sad to say it: this election was rigged and we can't let that happen. We can't let it happen for our country. And this election has to be turned around because we won Pennsylvania by a lot...I want to thank all of the people that signed affidavits and all of the speakers. You're fantastic people, you're great patriots...

(2:10:22) **And then very weird things happened. But they're not weird to professionals, and they're not weird to Dominion, and other people that operate machines and they're not weird to the people that handle the ballots where they were flooding the market...**

(2:13:23) And they have to turn over the results. It would be easy for me to say, oh let's worry about four years from now. No. This election was lost by the Democrats. **They cheated, it was a fraudulent election, they flooded the market. They defrauded everybody in ballots.** And I just want to thank everybody for being there. You're doing a tremendous service...**they're bad people. They're horrible people. And they're people that don't love our country...**And by the way, after November 3rd, **when people put votes in, and they put em in illegally, they put em in after the polls closed...**

(2:15:06) **And if something was done wrong, if this election was won fraudulently, and that's what happened, it was a fraud,** and we're talking about, very importantly, many more ballots, many more votes than the number we need. **In other words, if we needed 50,000 votes, we're not talking about we found nine dead people that voted...no we're talking about numbers that are far in excess of the 50,000...and they got caught... We have to turn the election over. Because there's no doubt, we have all the evidence, we have all the affidavits, we have everything...**(addressing Giuliani) this is going to be your crowning achievement, because you're saving our country. Thank you all very much. (2:17:02)”

See Exhibit C, 2:06:16 through 2:17:02 (**emphasis added**). See also Exhibit D.

42. Defendant Trump's aforementioned specific statements in averment 41, particularly as follows:

“(2:10:22) **And then very weird things happened... But they're not weird to other people that operate machines and they're not weird to the people that handle the ballots where they were flooding the market...**(2:13:23) **They cheated, it was a fraudulent election, they flooded the market. They defrauded everybody in ballots...when people put votes in, and they put em in illegally, they put em in after the polls closed...**(2:15:06) **And if something was done wrong, if this election was won fraudulently, and that's what happened, it was a fraud...In other words, if we needed 50,000 votes, we're not talking about we found nine dead people that voted...no we're talking about numbers that are far in excess of the 50,000...and they got caught...We have to turn the election over. Because there's no doubt, we have all the evidence, we have all the affidavits, we have everything**”

were specifically about Plaintiff herein, who was the only voting machine warehouse supervisor in Delaware County at the time of Defendant Trump's statements in those aforementioned regards, and in particular, Defendant Trump's statement regarding “the people that handle the ballots where they were flooding the market” and his two specific statements regarding “50,000 votes” were directly based upon and/or said in concert with the misrepresentations set forth by Defendant Stenstrom in those regards moments before, as set forth in averment 39, *supra*, and/or with the misrepresentations set forth by Defendant Hoopes, as set forth in averment 34, *supra*.

43. Defendant Giuliani continued his remarks at the Gettysburg hearing as set forth in Exhibit C at 2:21:14, whereupon he suggested the following solutions to rectify the fabricated fraud allegations set forth in all of the foregoing testimony:

“You could ask to see the ballots. You’re probably gonna see ballots that are official, and ballots that are unofficial. You have two major gaps. You have the 672,770 votes that were not inspected by anyone, secretly put into the ballot box. And then you have this gap, that I don’t understand, between the mail in ballots you sent out, 1.8 million, and the number you counted, 2.5 million. **That’s totally impossible to explain, other than what some of the witnesses were suggesting, that they were, that they were basically uh stuffing the ballot box.** I believe what happened is they never expected to be behind by 7 or 800,000 votes on election night. They expected to be behind by a couple of 100,000...Now you had a real big problem. So you had to create mail in ballots, you had to stretch it out for a while. We didn’t go into detail on the Dominion system, but we have two other experts who can show you how they injected votes into the Dominion system. And also, so I think I would settle, settle this election, **but I would definitely appoint a special prosecutor to prosecute the people who conducted this election.**

(2:27:19) Unfortunately, we don’t have the time to really analyze the votes. **Although, if you want to go into greater detail, we have other forensic experts that can show you votes that were specifically put into the machine, because these machines have a back door that allows you to do that.**

(2:39:45, in response to whether a forensic audit can be done): All of the material that we have, forensic material that we have, is archived, and we can easily make it available to you online, and you can look it over...But yes, you could do a forensic audit of the machines. You can do that. And I think it would, it would be very, very helpful. I understand that even one machine would give you a great deal of information about how the whole system operates, **and how they slipped votes in at various times.**”

See Exhibit C, 2:21:14 through 2:40:30 (**emphasis added**). See also Exhibit D.

44. Defendant Giuliani’s aforementioned specific statements in averments 32 and 43, particularly as follows:

“This voter fraud that took place, which as you will see from the witnesses that we call, had several dimensions to it, several different ways in which it was done...What are the odds that they all switched? Overnight? They just switched, by the next day. I think you’re gonna see how that, I think you’re

gonna see how that happened...Because that's what happened by the cheating that went on here...Your election, because of these two counties and maybe one other, is a sham. It's a disgrace, to your state...So now we'll proceed with the witnesses...

...That's totally impossible to explain, other than what some of the witnesses were suggesting, that they were, that they were basically uh stuffing the ballot box...but I would definitely appoint a special prosecutor to prosecute the people who conducted this election...Although, if you want to go into greater detail, we have other forensic experts that can show you votes that were specifically put into the machine, because these machines have a back door that allows you to do that...and how they slipped votes in at various times"

were specifically about Plaintiff herein, who was the only voting machine warehouse supervisor in Delaware County at the time of Defendant Giuliani's statements in those aforementioned regards, and in particular, Defendant Giuliani's two specific statements regarding "stuffing the ballot box," "the people who conducted this election," "votes that were specifically put into the machine," and "how they slipped votes in at various times" were directly based upon and/or said in concert with the misrepresentations set forth by Defendant Stenstrom in those regards moments before, as set forth in averment 39, and/or Defendant Hoopes, as set forth in averment 34, and Defendant Trump, as set forth in averment 41.

45. Defendant Ellis continued her remarks at the Gettysburg hearing as set forth in Exhibit C at 3:08:06, whereupon she said:

"So we would ask that you deal with that today and then, for the future, look at all of these things that you've raised, **look at all of the voting machines, look at all of these people who are interfering really.** You have an executive office and branch that is runaway. You have from your governor to your secretary of state **to these each of these individual election officers. This is election official fraud, and that's what's going on here.**"

See Exhibit C, 3:08:06 through 3:08:34 (**emphasis added**). See also Exhibit D.

46. Defendant Ellis' aforementioned specific statements in averment 45, particularly as follows:

“look at all of the voting machines, look at all of these people who are interfering really to these each of these individual election officers...This is election official fraud, and that’s what’s going on here”

were specifically about Plaintiff herein, who was the only voting machine warehouse supervisor in Delaware County at the time of Defendant Ellis' statements in those aforesaid regards, and in particular, were directly based upon and/or said in concert with the misrepresentations set forth by Defendants Giuliani, Hoopes, Stenstrom and/or Trump in those regards moments before, as set forth in averments 32-34, and 38-45, *supra*.

47. Defendant Giuliani's statements in averments 32, and 43-44, *supra*, were untrue, false, spiteful, contemptuous, wicked and false declarations of fraud and/or vote tampering and/or ballot tampering that he made with actual malice and/or knowledge that said statements were false and/or recklessly disregarding their falsity and/or with an evil motive and/or in reckless indifference to the rights of the Plaintiff, serving as they did as an independently planned and/or intentionally planned primer and/or contribution and/or addendum for the specific allegations of voter tampering and voter fraud about the Plaintiff that were subsequently levied against the Plaintiff by co-Defendants Hoopes, Stenstrom, and Trump in averments 34, and 39-42, *supra*.

48. Defendant Hoopes' statements in averment 34 and 38, *supra*, were untrue, false, spiteful, contemptuous, wicked and false declarations of fraud and/or vote tampering and/or ballot tampering that she made with actual malice and/or knowledge that said statements were false and/or recklessly disregarding their falsity and/or with an evil motive and/or in reckless indifference to the rights of the Plaintiff, serving as they did as an independently planned and/or

intentionally planned contribution and/or addendum for the specific allegations of voter tampering and voter fraud about the Plaintiff that were levied against him by co-Defendants Giuliani, Stenstrom and Trump in averments 32, and 39-44, *supra*.

49. Defendant Stenstrom's statements in averments 39-40, *supra*, were untrue, false, spiteful, contemptuous, wicked and false declarations of fraud and/or vote tampering and/or ballot tampering that he made with actual malice and/or knowledge that said statements were false and/or recklessly disregarding their falsity and/or with an evil motive and/or in reckless indifference to the rights of the Plaintiff, serving as they did as an intentionally planned contribution and/or addendum for the specific allegations of voter tampering and voter fraud about the Plaintiff that were levied against him by co-Defendants Giuliani, Hoopes and Trump in averments 32, 34, 41-44, *supra*.

50. Defendant Trump's statements in averments 41 and 42, *supra*, were untrue, false, spiteful, contemptuous, wicked and intentionally false declarations of fraud and/or vote tampering and/or ballot tampering that he made with actual malice and/or knowledge that said statements were false and/or recklessly disregarding their falsity and/or with an evil motive and/or in reckless indifference to the rights of the Plaintiff, serving as they did as an independently planned and/or intentionally planned contribution and/or addendum for the specific allegations of voter tampering and voter fraud about the Plaintiff that were levied against him by co-Defendants Giuliani, Hoopes and Stenstrom in averments 32, 34, 39-40, 43-45, *supra*.

51. Defendant Trump also published Defendant Stenstrom's erroneous testimony, as aforementioned, on Defendant Trump's own Instagram account, whereupon information and belief it was viewed over three million (3,000,000) times, and tweeted Defendant Stenstrom's erroneous testimony to his 88 million followers on Twitter.

52. Accordingly, as set forth in averments 32-34, and 38-45, *supra*, Defendants Trump, Giuliani, DJTFP, Giuliani PLLC, Ellis, Hoopes, and Stenstrom individually and/or collectively slandered and/or libeled the Plaintiff herein.

53. Ed Harkins, a resident of Philadelphia and while in his Philadelphia home, heard and/or watched the slanderous statements made against Plaintiff by Defendants in Exhibits C and D on or about November 25, 2020, and/or read the libelous statements made about Plaintiff by Defendants in Exhibits C and D on or about November 25, 2020, whereupon Mr. Harkins then called the Plaintiff from his Philadelphia home to inform Plaintiff about these statements approximately 4 or 5 days after the Gettysburg hearing, and said to the Plaintiff, “What did you do?” and continued to ask the Plaintiff about the representations made by Defendants herein, whereupon Plaintiff denied that said statements were true.

54. The Plaintiff never “stuffed” or padded or fixed or interfered with any ballot totals or vote tabulation (unlawfully, fraudulently, or otherwise) to actually increase or otherwise “fix” any vote tally for President Biden, by 50,000 votes or otherwise, with any USB v-cards or by any other method, as alleged by Defendants Trump, Giuliani, DJTFP, Giuliani PLLC, Ellis, Hoopes and/or Stenstrom, as aforementioned, and any such assertions to the contrary by said Defendants were and are not true.

55. Despite the falsity of all claim(s), from all Defendant herein, that Plaintiff interfered with the vote tabulation in Delaware County, Defendant Trump tweeted on November 27, 2020 as follows:



Donald J. Trump  @realDonaldTrump · 27 Nov 

BIG NEWS: Pennsylvania Poll Watcher: USB Drives uploaded to machines, gave Biden thousands of votes. Says 47 USB Drives are now missing. EVERY UPLOAD GAVE BIDEN 50,000 VOTES. @OANN

 **This claim about election fraud is disputed**

 24.7K  83.7K  255K 

The Arlington Press Conference

56. While all of the aforementioned lawsuits, in pursuit of fabricated fraud allegations, were pending in Philadelphia and/or Pennsylvania, and/or in concerted furtherance of the pestilential and/or false allegations made therein, Defendants Kline, Stenstrom and/or TMS individually and/or collectively orchestrated and/or participated in an intentional endeavor of slander and/or libel that was specifically directed against the Plaintiff herein, during a press conference that was held in Arlington, VA, on December 1, 2020 (hereinafter “the Arlington Press Conference”⁸ as further set forth at length *infra*.

⁸ See <https://www.youtube.com/watch?v=av-yC4mR5xo&list=PLvq9sTcSG0sWNij4jM1YT66bN-6vXs2rw>, a true and correct copy of which shall be provided to the Court and/or all counsel, and incorporated herein, as Exhibit E, and presents a front view of the testimony provided at the Arlington Press Conference.

57. Defendant Kline began his remarks at the Arlington Press Conference as set forth in Exhibit E at 1:53, whereupon he said as follows:

“Today, the Amistad Project of the Thomas More Society, in cooperation with several whistleblowers, is releasing **evidence of intentional fraudulent conduct** to improperly influence the 2020 election. **This evidence includes eyewitness accounts, eyewitness corroboration**, and the review and assessment of tangible evidence, which supports and corroborates the statements of witnesses.”

See Exhibit E, 1:53 through 2:21 (**emphasis added**).

58. Defendant Kline then continued his remarks at the Arlington Press Conference by introducing Defendant Stenstrom as a computer expert and poll watcher in Delaware County, as set forth in Exhibit E at 7:41 as follows:

“(Defendant Stenstrom is a) computer expert, he also was a poll watcher in Delaware County...he will describe to you how he was denied access...”

(8:45) America was kicked out of the counting room. And you must ask why? Why? **Gregory Stenstrom will share something with you that might indicate the why. Because the conduct of the officials that he witnessed, and of a private party, violated all of the rules to maintaining an integrity, the election, and cast serious doubt upon the management of the election in Delaware County**, and his observations have been mirrored else, mirrored elsewhere as well.”

(21:23) We have election experts that have been working with us who say that **that conduct in breaking the chain of custody** prevents the certification of the election process as applied under federal law, the Help America Vote Act. And we will have their testimony moving forward, in numerous cases, **that the way that they did this election was not consistent with federal law in every one of these urban areas in every swing state, and the question is why? Why not follow the law?**

(23:35) But let me move on a little bit further as it relates to the machines. **Gregory Stenstrom saw behavior in Delaware County, and there are affidavits elsewhere, that show intentional conduct that are a breach in election procedures, and actually collectively** – I’m not saying they did, it is a good question for them – **actually would allow the alteration of the count, but most certainly breaks the chain of custody, from critical jump drives or v-chips to the machines to the precinct to the ballot that makes auditing extraordinarily difficult, intentional conduct that makes auditing, the performance of those machines to the integrity of the count, extraordinarily difficult**. So right now I’d like to have Mr. Stenstrom come up and share with you what he experienced in Delaware County.”

See Exhibit E, 7:41 through 24:56 (**emphasis added**).

59. Defendant Stenstrom began his remarks at the Arlington Press Conference as set forth in Exhibit E at 25:08, whereupon he said as follows:

“Thank you, Phil. I was a Republican poll watcher and observer in Delaware County, Pennsylvania. As I previously testified before a special committee of the Pennsylvania legislature in Gettysburg, Pennsylvania last Wednesday, I’m a citizen, a former commanding and executive officer in the Navy, a veteran of foreign wars, a data scientist, and an expert in security and fraud. I witnessed irregularities at 7 polls in 22 precincts on election day, primarily poll workers providing voters regular ballots instead of provisional ballots when records indicated that those voters had requested mail in ballots. But what I observed at the centralized Delaware County vote counting center when I arrived there at 6 p.m., and then over the next three days, was a forensically destructive process that involved mail in ballots, drop box ballots, and electronic USB v-card vote uploads...

(27:15) There were disturbing breaches of protocol taking place in plain sight. At one point, I saw unsecured USB v-card drives from voting machines being separated from their accompanying cartridges and paper tapes, and comingled together by election workers. These actions destroyed any forensic auditability and corrupted the chain of custody. Formal objections to election officials and law enforcement officers that were present went unanswered. **Later, I saw the voting machine warehouse supervisor for Delaware County carrying in in, in unsealed, in unsealed bags of unsecured USB v-card drives, which he inexplicably proceeded to plug into computers, the vote counting computers, and upload into the official vote tally.** Despite formal objections to senior law enforcement that was present, and election board officials, **he was allowed to continue. When he was finished, the vote count shot up by 50,000 votes for Vice President Biden.** 47 USB cards were missing at the end of last week. As of today that number has reportedly grown to 64. When I finally gained access to the sequestered room, this is the three days later, where mail in ballots were ingested, I witnessed 60 to 70,000 unopened mail in ballots, unopened mail in ballots, in sequestered back offices. That was on Thursday, at 3:30, after the vote was supposedly counted. They remain unaccounted for, we don’t know where they are. All signed paper chain of custody documents are missing, despite attempts by Democrat election officials to recreate them. My questions then and now remain, where did the ballots come from, where did these mail in ballots come from, and where did they go? Thank you for your time. Phil, appreciate being here.”

See Exhibit E, 25:08 through 29:39 (**emphasis added**).

60. Defendant Kline continued his remarks at the Arlington Press Conference as set forth in Exhibit E at 29:43, whereupon he said:

“And there’s another question. Why? **Why engage in conduct that you know destroys the chain of custody of this important material, in a vital election, unless there is an objective. People don’t violate the law intentionally unless they have a reason.** What could be the reason? And so, we started to explore...how would you use that destruction of evidence and why would it be necessary to destroy this evidence to engage in this conduct? You have to understand what evidence is within the machine. What evidence is trying to be separated from us so that we do not know what happened....

(31:42) So now we got drop boxes, **we got a break in the chain of custody**, we got all this alteration of election procedures...

(32:25) **So how do you inject fraudulent ballots into the stream to be counted?** Well there are a couple of things, and I’m not saying this is the path, **but this reality, this truth**, demands questions and demands hard answers and hard evidence...

(38:50) Now they will tell you, “I assure you that everything’s fine. There’s no fraud going on.” That is an actual quote of an election official in Delaware County to get Gregory Stenstrom when he was trying to get into the room that he had the right to get into and he saw people moving around, it was mail crates of ballots, mail crates and they said, (hands up) “Ah. I assure you. Everything’s fine. There’s no fraud going on.” At some point, that answer does not hold. At some point, it doesn’t hold.”

See Exhibit E, 29:43 through 39:22 (**emphasis added**).

61. Defendant Kline’s aforementioned specific statements in averments 57-58, and 60, *supra*, particularly as follows:

“evidence of intentional fraudulent conduct...This evidence includes eyewitness accounts, eyewitness corroboration...Gregory Stenstrom will share something with you that might indicate the why. Because the conduct of the officials that he witnessed, and of a private party, violated all of the rules to maintaining an integrity, the election, and cast serious doubt upon the management of the election in Delaware County...that conduct in breaking the chain of custody...that the way that they did this election was not consistent with federal law in every one of these urban areas in every swing state, and the question is why? Why not follow the law?...Gregory Stenstrom saw behavior in Delaware County, and there are affidavits elsewhere, that show intentional conduct that are a breach in election

procedures, and actually collectively... actually would allow the alteration of the count, but most certainly breaks the chain of custody, from critical jump drives or v-chips to the machines to the precinct to the ballot that makes auditing extraordinarily difficult, intentional conduct that makes auditing, the performance of those machines to the integrity of the count, extraordinarily difficult... Why engage in conduct that you know destroys the chain of custody of this important material, in a vital election, unless there is an objective. People don't violate the law intentionally unless they have a reason... we got a break in the chain of custody... So how do you inject fraudulent ballots into the stream to be counted... but this reality, this truth"

were specifically about Plaintiff herein, who was the only voting machine warehouse supervisor in Delaware County at the time of Defendant Kline's statements in those aforementioned regards, and in particular, were directly based upon and/or said in concert with the misrepresentations set forth by Defendants Stenstrom, as set forth in averments 59 *supra*.

62. Defendant Kline's statements in averments 57-58, and 60, *supra*, were untrue, spiteful, contemptuous, wicked and false declarations of fraud and/or vote tampering and/or ballot tampering that he made with actual malice and/or knowledge that said statements were false and/or recklessly disregarding their falsity and/or with an evil motive and/or in reckless indifference to the rights of the Plaintiff, serving as they did as an independently planned and/or intentionally planned primer and/or contribution and/or addendum for the specific allegations of voter tampering and voter fraud about the Plaintiff that were previously and/or subsequently levied against the Plaintiff by co-Defendant Stenstrom, in averments 59, and/or the other Defendants as set forth in averments 32-34, 38-45, *supra*.

63. Defendant Stenstrom's aforementioned specific statements in averment 59, *supra*, particularly as follows:

"Later, I saw the voting machine warehouse supervisor for Delaware County carrying in in, in unsealed, in unsealed bags of unsecured USB v-card drives, which he inexplicably proceeded to plug into computers, the vote counting

computers, and upload into the official vote tally...he was allowed to continue. When he was finished, the vote count shot up by 50,000 votes for Vice President Biden”

were specifically about Plaintiff herein, who was the only voting machine warehouse supervisor in Delaware County at the time of Defendant Stenstrom’s statements in those aforementioned regards, and in particular, were directly based upon and/or said in concert with the misrepresentations set forth by Defendants Kline, as set forth in averments 57-58, and 60 *supra*.

64. Defendant Stenstrom’s statements in averments 39, 40, and 59, *supra*, were untrue, spiteful, contemptuous, wicked and false declarations of fraud and/or vote tampering and/or ballot tampering that he made with actual malice and/or knowledge that said statements were false and/or recklessly disregarding their falsity and/or with an evil motive and/or in reckless indifference to the rights of the Plaintiff, serving as they did as an independently planned and/or intentionally planned primer and/or contribution and/or addendum for the specific allegations of voter tampering and voter fraud about the Plaintiff that were previously and/or subsequently levied against the Plaintiff by co-Defendant Kline, in averments 57-58 and 60, and/or the other Defendants as set forth in averments 32-34, and 38-45, *supra*.

65. Any and all statements made by Defendant Kline and/or Defendant Stenstrom during the Arlington Press Conference were made under the auspices of and/or with the tacit approval and sponsorship of Defendant TMS.

Stenstrom Affidavit

66. In support of yet another lawsuit seeking to overturn the results of the 2020 Presidential election in Pennsylvania, filed in the Commonwealth Court of Pennsylvania at 636 MD 2020, and/or otherwise cast aspersions upon the otherwise proper and appropriate conduct of Plaintiff herein, and as aforementioned during the testimony at the Gettysburg hearing and/or the

Arlington Press Conference, Defendant Stenstrom signed a sworn Affidavit on November 9, 2020, a true and correct copy of which is attached hereto and incorporated herein as Exhibit F, in which Defendant Stenstrom made the following statement about the Plaintiff, to wit:

“28. It was during this time that Leah Hoopes, who had remained behind in the counting room (see her Affidavit) observed Jim Savage, the Delaware County voting machine warehouse supervisor, walk in with about a dozen USB drives in a clear unsealed bag, and she showed me two photos she had been able to surreptitiously take (no photos or camera use was permitted anywhere in the counting rooms despite live streaming cameras throughout the room).

29. ...and upon my return to the counting room at approximately 11 am, **I observed Mr. Savage plugging USB drives into the vote tallying computers.** The bag containing those drives was not sealed or secured, and the voting machine cartridges were not present with the drives, and he had no ballots at that time.

30. I immediately objected and challenged the uploading of votes from the unsecured drives...but I could not make any comments or ask any questions while Mr. Savage was directly in front of us loading USB sticks, and the display monitors about the computers reflected that they were being updated. **I responded that I was indeed observing a person plug USB sticks into the computer without any apparent chain of custody and without any oversight.** No one stopped the upload, and Mr. Savage was permitted to continue this process and he was then allowed to walk out without any interference or examination by anyone...

31. **Approximately one hour after Savage had departed, at 1:06 pm, the center published an update on the vote. The numbers moved dramatically as follows: from approximately 140,000 Biden and 85,000 Trump in the morning; to now approximately 180,000 Biden and 105,000 Trump after the 1:06 PM update. (At that 1:06 PM update, ALL Republican candidates who had previous leads were reversed and flipped),...**

47. In the presence of Ms. Biancaniello and Attorney Henry, I asked the now present Mr. McBlain to explain how the USB drives had made their way to the center carried by Mr. Savage. He informed me that in his experience, some USB drives were typically left in voting machines by judges of elections overnight in previous elections, and that Mr. Savage had simply found them in the machines that had been returned from polling locations back to the warehouse, including machines that still had all components in them (USB. Cartridge, and Paper Tape) and that the next day he had transported approximately 24 USB sticks and an assortment of cartridges and tapes from the warehouse to the counting center. I pressed him to find out why there had been so many, and why there was no chain

of custody, and why Mr. Savage would be involved in entering the USB drives into the computers without any other election officials present, particularly Ms. Hagan, who had overseen the process previously. Mr. McBlain informed me that it had been explained to him that some judges of elections had left entire scanners – with cartridges, USB drives and tapes – and that the moving company had returned them to the warehouse, where Mr. Savage collected everything and put them in bags. This explanation, in part, accounted for the 5 large election judge bags that I witnessed had been carried in by a Sheriff earlier, and I was able to take photos of them being removed from the building later.

48. I informed Mr. McBlain in the presence of Ms. Biancaniello **that I had seen the 30,000 vote jump for Biden after Mr. Savage had plugged in the USB drives earlier, as described above, and asked them both if that was ‘normal’ for previous elections, and they did not respond.**

49. Despite my multiple, strong and forceful objections, to the lack of transparency, and what I perceived to be a significant break down in any chain of custody, I was routinely ignored by election officials, and was met by mostly blank stares and shoulder shrugs by Mr. McBlain.”

See Exhibit F. See also Exhibits C, D and E (wherein references to this Affidavit from Defendant Stenstrom were made by other Defendants herein as proof of vote manipulation by *inter alia* Plaintiff herein).

67. Defendant Stenstrom’s representations in Exhibit F, in and of themselves, unquestionably cast malignantly false aspersions and/or false insinuations and/or false statements of fact upon and/or about Plaintiff herein, namely that Plaintiff fraudulently and/or unlawfully “fixed” or added votes for President Biden to the total vote count. *See Exhibit F.*

68. Defendant Stenstrom’s representations in Exhibit F, in conjunction with and as referenced in his statements in Exhibits C through E, unquestionably cast malignantly false aspersions and/or false insinuations and/or false statements of fact upon and/or about Plaintiff herein, namely that Plaintiff fraudulently and/or unlawfully “fixed” or added votes for President Biden to the total vote count. *See Exhibit F. See also Exhibits C through E.*

69. Defendant Stenstrom’s statements in averments 66, *supra*, were untrue, spiteful, contemptuous, wicked and false declarations of fraud and/or vote tampering and/or ballot

tampering on the part of the Plaintiff, that he made with actual malice and/or knowledge that said statements were false and/or recklessly disregarding their falsity and/or with an evil motive and/or in reckless indifference to the rights of the Plaintiff, serving as they did as an independently planned and/or intentionally planned primer and/or contribution and/or addendum for the specific allegations of voter tampering and voter fraud about the Plaintiff that were previously and/or subsequently levied against the Plaintiff by co-Defendants Kline and TMS, in averments 57-58 and 60, and/or the other Defendants as set forth in averments 32-34, and 38-45, *supra*.

Defendant Stenstrom’s statements on Fox News’ “Hannity” program on December 3, 2020

70. While all of the aforementioned lawsuits, in pursuit of fabricated fraud allegations, were pending in Philadelphia and Pennsylvania, and/or in concerted furtherance of the pestilential and/or false allegations made therein, Defendant Stenstrom individually and/or collectively orchestrated and/or participated in an intentional endeavor of slander that was specifically directed against the Plaintiff herein, during an interview with Sean Hannity of Fox News on December 3, 2020 (hereinafter “the Hannity interview”)⁹ as further set forth at length *infra*.

71. As set forth in the Hannity interview in Exhibit G, Defendant Stenstrom stated as follows beginning at 3:01:

“Sure. It was a couple of different components. The uh USB sticks are used in the voting machines. They come out of the scanners and they’re used to upload into computers at the counting center. That’s how the precincts report in and the counts go up. So those USB sticks are all supposed to come back with the ballots, with the cartridge, with paper tapes uh by the election judges, they’re all supposed to come into the voting center. Um what we found was a bunch of baggies that came in, USB sticks and the paper tapes and the cartridges were all taken apart, comingled, um there was a forensically destructive process. But 396 precincts

⁹ See <https://www.foxnews.com/politics/pennsylvania-whistleblower-speaks-out-hannity>, a true and correct copy of which shall be provided to the Court and/or all counsel, and incorporated herein, as Exhibit G.

reported supposedly that night, uh and the next morning and the day after **and the day after, uh the voting machine um warehouse supervisor, uh I witnessed him 24 plus times, um with 24 sticks actually, uploading uh votes from USB sticks. Uh I objected, I brought senior law enforcement over, we brought the clerk of elections over, and they said “you’re an observer, there’s nothing you can do” and I said, “he’s not part of the process.” After he finished uploading them, um, the sticks, um, made him update, I made them update the vote, uh and the difference was 50,000 votes for President uh Vice President Biden. Uh that was 50,000** (4:20) ...

(5:12)...**so in a nutshell, we had 50,000 USB votes**, 70,000 mail in ballots, **and then we had in addition to having a forensically destructive process, the uh all all custody sheets are gone now as well**. And as of today there’s uh over excuse me as of the today uh there were 47 USB sticks missing, and now we understand there’s 64 USB sticks missing, which comprises thousands of votes which are now in question. That’s it. Thank you.

Hannity: Well, thank, no, thank you Greg. Thank you for telling a story and you also signed a legal affidavit, correct, under the...

Defendant Stenstrom: ...Absolutely yeah...

Hannity: ...penalty of perjury...

Defendant Stenstrom: ...yes...

Hannity:and you know that if you lie in that affidavit, that’s perjury, right?

Defendant Stenstrom: That is true. (5:56)”

See Exhibit G, 3:01 to 5:56.

72. Defendant Stenstrom’s representations in Exhibit G, in conjunction with and as referenced in his statements in Exhibits C through F, unquestionably cast malignantly false aspersions and/or false insinuations and/or false statements of fact upon and/or about Plaintiff herein, namely that Plaintiff fraudulently and/or unlawfully “fixed” or added votes for President Biden to the total vote count. See Exhibit G. See also Exhibits C through F.

73. Defendant Stenstrom’s statements in averments 71, *supra*, were untrue, spiteful, contemptuous, wicked and false declarations of fraud and/or vote tampering and/or ballot

tampering on the part of the Plaintiff, that he made with actual malice and/or knowledge that said statements were false and/or recklessly disregarding their falsity and/or with an evil motive and/or in reckless indifference to the rights of the Plaintiff, serving as they did as an independently planned and/or intentionally planned primer and/or contribution and/or addendum for the specific allegations of voter tampering and voter fraud about the Plaintiff that were previously and/or subsequently levied against the Plaintiff by co-Defendants Trump, Giuliani, DJTFFP, Giuliani PLLC, Hoopes, Kline, and TMS, in averments 32-34, and 38-45, 57-58 and 60, *supra*.

Aftermath and Consequences

74. As a consequence of all of the actions and/or inactions of the Defendants as further set forth at length *supra*, the Plaintiff requested Superintendent Scott D. Mahoney of Delaware County's Department of Public Safety, Bureau of Park Police and Fire Safety, to provide protection to the Plaintiff and the members of his office staff, given the number of death threats and/or abusive communications that Plaintiff experienced in the aftermath of these baseless and defamatory accusations from the Defendants.

75. Any and/all omission(s) by the Defendants of directly referencing the Plaintiff by his name, and instead using the phrase "Voting Machine Warehouse Supervisor," provided no anonymity for the Plaintiff, and had the same effect as if they had actually used his name, as opposed to his title and/or job position.

76. As set forth at length *supra*, the claims made by the Defendants at or during the Gettysburg hearing, the Arlington Press Conference, the Hannity program and/or Fox News, and in any Affidavit(s) attached hereto, were knowingly false.

77. Despite this, Defendants refused to stop maliciously disparaging Plaintiff, through the aforementioned avenues as well as other publications and/or television programs remaining to be discovered.

78. Upon information and belief, Defendants Trump and DJTFP used Defendant Stenstrom's affidavit, in Exhibit F, in their recent appeal to the Supreme Court of the United States, which the Supreme Court swiftly dismissed.

79. As a result of the Defendants' conduct, Mr. Savage has sustained irreparable harm to his reputation.

80. Indeed, Mr. Savage's character has been assassinated on a national level.

81. Mr. Savage's community members in the Philadelphia region have seen and heard and/or read the defamatory statements said and published about Mr. Savage's alleged fraudulent tampering with the vote tabulation in Delaware County.

82. As a result of the Defendants' knowingly false statements, Mr. Savage and his family have been the target of threats and intimidation, including at his place of work and/or his home.

83. Indeed, less than a week before Trump supporters stormed the Capitol building in Washington D.C. on January 6, 2021, the Plaintiff was accosted at his work by two men without credentials asserting that they wanted to search his work and were there on behalf of "the voters."

84. Given Defendant Trump and DJTFP's increasingly volatile rhetoric and the tendency of their supporters to engage in violence, as best exemplified by the extent that the Capitol building

was overrun on January 6, 2021, Plaintiff rightfully feared and continues to fear for the safety of himself and his family.

85. As set forth *supra*, the defamatory claims and/or insinuations made by the Defendants were clearly false as the Plaintiff lacked the training needed to operate the software for the purposes of vote tabulation, and in full view of the Defendants herein, Defendant Hoopes conceded as much at the Gettysburg hearing.

86. As set forth *supra*, the defamatory claims and/or insinuations made by the Defendants directly and/or by implication conveyed the false communication that the Plaintiff was a corrupt individual trying to sway the outcome of the vote tabulation in the 2020 Presidential election by providing 50,000 votes for President Biden himself.

87. As a direct result of these false and defamatory statements about the Plaintiff, he suffered substantial harm, including but not limited to:

- a. damage to his ability to earn a living because the Defendants promoted the ideas that Mr. Savage is a criminal who should not be trusted;
- b. the destruction of his reputation among his co-workers, friends, clients, and community at large; and
- c. living in constant fear of violence for himself and his family from Trump supporters who believe that the Plaintiff altered the outcome of the election, due to the outrageous false statements, by the Defendants, as set forth *supra*.

88. Indeed, on the basis of Plaintiff's alleged actions and/or other alleged "schemes" to "steal the election," Defendants filed the multiple, aforementioned lawsuits in State and Federal Courts in Philadelphia and elsewhere in Pennsylvania, and all of these lawsuits were dismissed due to

inter alia the absence of any evidence to support any claims of fraudulent interference with vote tabulation, by the Plaintiff or otherwise.

89. In the quest to overturn the election, the Defendants and/or their supporters targeted individuals like the Plaintiff, and actively and maliciously disseminated the facially absurd claim that Plaintiff individually somehow changed the vote tabulation by uploading 50,000 votes for Joe Biden from suspiciously collected USB v-cards, as set forth by the Defendants *supra*.

90. At the time they made their claims in these regards, the Defendants knew that what they were describing was an absolute impossibility, namely because Mr. Savage was not trained to use the software that uploads data from the USB v-cards, as confessed by Defendant Hoopes.

91. Therefore, the claims from Trump and his supporters were baseless and impossible.

92. Despite these facts being known to them, the Defendants nonetheless repeated the allegations as aforementioned in order to portray the Plaintiff as a criminal and a fraud and deliberately place his reputation and/or his liberty and/or life in mortal danger, particularly with Defendants Giuliani and Giuliani PLLC's suggestion that the Plaintiff, among others, be prosecuted, as aforementioned.

93. Indeed, Plaintiff continues to receive death threats as a result of Defendants' actions and/or inactions in these aforementioned regards, amplifying baseless conspiracy theories in pursuit of their fabricated fraud allegations, such that Plaintiff suffered two (2) heart attacks in the aftermath of all of the aforementioned, wrought by the Defendants' wicked, malicious behavior, as aforementioned.

94. On or about June 24, 2021, Defendant Giuliani's license to practice law was suspended by the Supreme Court of the State of New York (per Petition of the Attorney Grievance

Committee thereof, a true and correct copy of which is attached hereto and incorporated herein as Exhibit H), upon the grounds that Defendant Giuliani had actively endeavored to mislead judges, lawmakers and the public, and made false statements in support thereof, as he helped to shepherd Defendant Trump’s legal challenges to the 2020 election results, including “statements that the respondent made following the 2020 election at press conferences, state legislative hearings” such as the Gettysburg hearing herein “radio broadcasts (as both a guest and host), podcasts, television appearances and one court appearance. (Giuliani) concedes that the statements attributed to him in this motion were all made in the context of his representation of Donald J. Trump and/or the Trump campaign.” *See* Exhibit H, p. 5-6.

95. Most importantly, Defendant Giuliani’s law license was suspended upon the following grounds by the Supreme Court of the State of New York:

“Notwithstanding the true facts, (Giuliani) repeatedly advanced false statements that there were 600,000 to 700,000 fabricated mail-in ballots, which were never sent to voters in advance of the election. (Giuliani) made these false claims...during a November 25, 2020 meeting of the Republican State Senate Majority Policy Committee in Gettysburg, Pennsylvania...(Giuliani also repeatedly made false statements about dead people voting in Philadelphia)...at least twice before the AGC brought this motion; first at a November 7, 2020 press conference at Four Seasons Total Landscaping and again during the November 25, 2020 meeting of the Republican State Senate Majority Policy Committee in Gettysburg, Pennsylvania.”

See Exhibit H, p. 10, 15.

96. As set forth in Exhibit H, Defendant Giuliani’s “defense is that he did not make this misstatement knowingly...There is simply no proof to support this explanation.” *See* Exhibit H, p. 10.

97. On Saturday, August 14, 2021, Defendants Giuliani admitted in a sworn deposition, in the matter of Eric Coomer, Ph.D. v. Donald J. Trump for President, et. al., in the District Court

of Denver County, Colorado, Case No. 2020-cv-34319 (a true and correct copy of which is attached hereto and incorporated herein as Exhibit I), that as a matter of regular policy, pattern, practice and/or habit, particularly during the 2020 presidential election, he did not conduct any full factual investigation before press conferences (such as the Four Seasons Landscaping press conference, or the Gettysburg hearing), and particularly not for exculpatory material that would refute the “facts” he’d like to present at such events, to wit:

“Q. You said the story was credible and then you gave your reasons. Do you have any knowledge about this source...that led you to believe he was credible?”

A. No, I didn’t have any information that he wasn’t. I mean the way it works in a fast-moving case, **I used to do liable cases, right**, it’s not my job in a fast-moving case to go out and investigate every piece of evidence that’s given to me, otherwise you’re never going to write a story, you never come to a conclusion...I would have to have been a terrible lawyer that would like to exercise – rather than giving my client the benefit of the doubt, I’d like to exercise every single thing I could against my client, gee, let’s go find out it’s untrue. I didn’t have the time to do that, and there was nothing that said to me I should do it...I’m constrained by time. Constrained by time, I don’t mean the press conference time, I mean the realistic time...

Q. And ultimately you would agree that the judge...is to decide those types of issues, not you or frankly not me?...

A. ...She gets to decide whether or not **I knew that I was lying when I said that or I was just about totally irresponsible in saying it when there wasn’t a single thing that pointed me in the direction that there wasn’t anything wrong with it, anything contrary to it.**”

See Exhibit I, p. 120, li 10 to li. 20; p. 121, li. 12 to li. 20; p. 121, li. 23 to p. 122, li. 2; p. 131, li. 12 to p. 132, li. 3.

98. In contrast to his representations in Coomer case, Defendants Giuliani and Giuliani PLLC knew or had reason to know that allegations against the Plaintiff of vote tabulation interference, by all Defendants in general and/or Hoopes and/or Stenstrom and/or Giuliani in particular, were false and/or wrong because Defendant Hoopes herself testified that she believed the Plaintiff was not experienced in such activities, to wit:

the voting machine warehouse supervisor is a Bernie Sanders delegate who was also solely responsible for every scanner, machine, v-card, and all machines with absolutely zero experience in this area...

See averments 34 and 38, *supra*. *See also* Exhibit C, at 44:19. *See also* Exhibit D.

99. Defendant Giuliani also further testified in Exhibit I that:

“A...the campaign was doing everything it could to keep things from me, including undermining the litigation in Pennsylvania which is a totally different matter.

Q. Explain what you mean by that, the campaign was trying to keep things from you?

A. I think the campaign had a different view of what should be done. The campaign in my opinion had checked out about three, four weeks before the election. They were pretty much convinced he was going to lose, they were looking for jobs, they were worried about their standing in the Washington community. When I walked in there and asked for all of the preparation for the draft complaints and the – because I had been told they were ready for everything, I got nothing. They had done nothing...In any event, when I showed up there with my team, they took about 45 minutes to show up themselves and I said I’m going to really need all the draft complaints. They didn’t have any so we had to start from the beginning. They did have a complaint in – they were going about filing a complaint in Pennsylvania. Before I could spend any more time on that, Pennsylvania became a major issue because our people were being shut out in Pennsylvania and I sent Corey and the former Attorney General there. And when they came back, I said where’s our Pennsylvania lawsuit? We don’t have one so I started writing one myself with the lawyer who was in charge, Hicks, and it alleged fraud. And it had in it all of the – much like the Michigan complaint which we submitted to you which outlines 100 affidavits, specific ones demonstrating fraud, we put together one for Pennsylvania like that and we submitted it. And the lawyer in charge, Mr. Hicks, had to resign because his law firm was pressuring him. He had refused to resign and then his wife received death threats...And without telling me, the campaign, although I was supposedly in charge, submitted its own complaint without fraud alleged in it...I found out the night before the argument, even though I was going to argue the case, that I was going to argue the second complaint, not the one that I had drafted, so I made a quick motion before the judge for yet another amended complaint to restore our fraud. And the reason why this statement is used against me so often that I said there was no fraud is I didn’t say there was no fraud in the case, I said there was no fraud in the complaint that had been substituted for my complaint because they didn’t – they didn’t agree that we should go about the lawyer’s task of trying to prove fraud in all of the different states.

Q. And you disagreed with that?

A. I knew that if that's what we did, **even if were to get it in court we wouldn't have proved anything that would overturn the election. The fact is that there was fraud and they never saw it. Not only did they never see it, they didn't have the energy to go investigate it. They were basically looking for jobs.**

Q. I think your –

A. I mean I've been involved in many, many presidential campaigns. This campaign had checked out three weeks earlier and they undermined – I even have memos –

MR. SIBLEY: Let's not talk about memos.

A. – from Republican National Committee people and from other people on the campaign telling people not to cooperate with us, Jenna and me, because the republican party will do better if Trump loses, they'll collect more money. There was no question there was a major effort to undercut what we were doing.

Q. So turmoil within the campaign because of –

MR. ZAKHEM: Object to form.

THE WITNESS: Well, it put us in a position where they were undercutting him, they wanted to defeat him. So when you give me this and it's done by the campaign, I don't know who they are working for. The complaint that was substituted for the complaint that I had worked out with Hicks completely subverted our theory of the case, was done in order to tank the case and was done without ever telling me, and there were more than a few acts like this...

...

Q. Okay. So did you have access to the research done by the communications department if you wanted it?

A. I don't know why I'd want it. Why would I want the communications department research? I'm a lawyer. They are politicians. Yes, I mean I might want specific things but I'm not going to use the communications department of the campaign to do legal research. Plus I didn't know what side the Trump campaign was working for.

Q. So –

A. I thought the majority of them were working for him to concede as soon as possible so they could move on to another job and so they wouldn't be criticized too heavily in the Washington Post because there was a tyranny of fear going on at the time pushed by the Post and anybody doing this is some kind of a maniac, right wing and it affected my people. It affected Hicks dropping out. It affected most of the people in the campaign acting based on their true loyalty, which is Washington politicians wanting to hold onto jobs in Washington and not wanting to go against the establishment, there was no fraud, there was no fraud...

...

Q. Well, I'm just asking you a question.

A. I'm going to finish my answer, sir. You asked a question and I'm going to finish it. **And I'm hardly going to tell someone to make an allegation and just say it without having substantial amount of proof of it.**"

See Exhibit I (emphasis added), p. 139, li. 18 to p. 140, li. 14; p. 141, li 8 to p. 142, li. 11; p. 142, li. 19 to li. 22; p. 143, li. 3 to p. 145, li. 12; p. 145, li. 21 to p. 146 li. 25; p. 171, li. 3 to p. 171, li. 10.

100. Therefore, upon the basis of Defendant Giuliani's deposition in Exhibit I and his confessions therein about the lack of trustworthy information that he was (or wasn't) receiving from Defendant DJFTP, and his belief that employees of Defendant DJFTP had given up on the election, Plaintiff believes and therefore avers that Defendants Giuliani, Giuliani PLLC, Trump, and/or DJFTP had an obligation to verify the accuracy of the representations, that they were then later facilitating by Defendants Hoopes and Stenstrom at the Gettysburg hearing, that it was by contrast the Plaintiff *inter alia* who had snatched the election from Defendant Trump's grasp.

101. Therefore, in the alternative and/or perhaps more accurately, neither Defendant Giuliani, nor Giuliani PLLC, nor Defendant Trump, nor Defendant DJFTP believed that the statements they were later then presenting from Defendants Giuliani, Hoopes, Stenstrom and/or Ellis were true, and/or at the very least presented the same with reckless disregard as to whether or not they were true as to the Plaintiff herein.

102. In any event, as set forth in Exhibit H and as a matter of judicial notice, the Supreme Court of New York has already decided for itself that Defendant Giuliani made a series of misrepresentations and/or lies at the Gettysburg hearing.

COUNT I
PLAINTIFF v. ALL DEFENDANTS
DEFAMATION – LIBEL AND/OR SLANDER

103. Plaintiff hereby incorporates averments 1 through 102, *supra*, as though fully set forth herein at length.

104. The aforementioned defamatory statements and/or insinuations about the Plaintiff, individually and/or collectively, as set forth in averments 32-34, 38-46, 55, 57-61, 63, 66, and 71, *supra*, are false.

105. The aforementioned defamatory statements and/or insinuations about the Plaintiff, in averments 32-34, 38-46, 55, 57-61, 63, 66, and 71 were made by and/or read by and/or presented by specific Defendant and/or Defendants mentioned therein, as further set forth therein at length *supra*.

106. These defamatory statements and/or insinuations, individually and/or collectively, have defamatory character and are *per se* defamatory for the following reasons, among others:

- a. they ascribe to Plaintiff conduct, character, or a condition that adversely reflects upon, and have and will adversely reflect upon, his fitness and/or perceived fitness to be in any position of trust, including as a Voting Machine Warehouse Supervisor;
- b. they ascribe to Plaintiff acts and failures to act that are improper and unlawful and impugn his integrity and denigrate his personal and professional reputation;

- c. they expose Plaintiff to hatred, contempt, ridicule, and/or threats of physical harm and/or myocardial infarctions, and otherwise injure him in his business and/or profession and/or impair his reputation and standing in the community and/or cause him personal humiliation and/or mental anguish and suffering; and,
- d. they lower Plaintiff in the estimation of the recipients of the statements and deter third persons, including potential employers, clients and co-workers from associating with and/or engaging with him or employing him in any capacity.

107. Any and all persons who have read or heard, or will read or hear, the above defamatory statements and/or insinuations understood, and/or will understand, the same as having a defamatory meaning as applied to the Plaintiff.

108. Any and all persons who have learned, or will learn, about the above defamatory statements and/or insinuations from other third parties understood, and/or will understand, the same as having defamatory meaning as applied to the Plaintiff.

109. The aforementioned defamatory statements and/or insinuations are false.

110. Defendants knew and/or should have known, when they published the aforementioned defamatory statements and/or insinuations, that they were false and/or were unreliable at a bare minimum and/or were of questionable veracity.

111. Despite knowing the falsity of the statements and/or insinuations, and/or the likelihood thereof, Defendants promoted them anyway, on a national level, to support their vapid claims of widespread election fraud, which were bereft of any evidence whatsoever, particularly as concerns the Plaintiff herein.

112. Defendants delivered and published the aforementioned defamatory statements and/or insinuations with actual malice and/or a reckless disregard for the truth of the statements expressed therein about the Plaintiff.

113. As a direct and proximate result of the delivery and publication of the aforementioned defamatory statements and/or insinuations, Plaintiff has suffered injury, including, but not limited to two (2) heart attacks, the denigration of his integrity, and his personal and professional reputation; the exposure to hatred, contempt, ridicule, and/or threats of physical harm and/or myocardial infarctions, and otherwise in his business and/or professional and/or personal life; and lowered the Plaintiff in the estimation of the recipients of the statements and/or deterred third persons including potential employers, clients and co-workers from associating with and/or engaging with him or employing him in any capacity.

114. Defendants Giuliani and/or Giuliani PLLC, in particular, imputed to the Plaintiff a criminal offense warranting criminal prosecution, thereby constituting defamation *per se*.

WHEREFORE, Plaintiff requests judgment in his favor against Defendants, jointly and severally, in an amount in excess of \$50,000 sufficient to fully compensate him, together with punitive damages, interest, costs of suit, and such further relief deemed equitable and just.

COUNT II
PLAINTIFF v. ALL DEFENDANTS
FALSE LIGHT INVASION OF PRIVACY
RESTATEMENT OF TORTS (SECOND) § 652(e)

115. Plaintiff hereby incorporates averments 1 through 114, *supra*, as though set forth fully herein at length.

116. All of these statements and insinuations, as aforementioned, were false, and Defendants maliciously disregarded the falsity of the same.

117. Defendants made these statements and insinuations with the intent of harming Plaintiff's reputation in the eyes of his peers and members of his community so that Mr. Savage would be deemed dishonest and regarded as a criminal.

118. As a direct and proximate cause of said false statements, Mr. Savage's reputation has been damaged, his earning capacity has been greatly diminished, and he suffered two (2) heart attacks.

119. Defendants intentionally cast Mr. Savage in a false light by falsely and adamantly accusing him of criminal activity and tampering with the election.

120. Defendants' false statements and insinuations described above, casting Mr. Savage in such a false light, would be and certainly are highly offensive to any reasonable person.

121. As a direct and proximate result of Defendants so casting Mr. Savage in a false light, Mr. Savage has suffered severe and permanent damage as set forth above.

WHEREFORE, Plaintiff requests judgment in his favor against Defendants, jointly and severally, in an amount in excess of \$50,000 sufficient to fully compensate him, together with punitive damages, interest, costs of suit, and such further relief deemed equitable and just.

COUNT III
PLAINTIFF v. ALL DEFENDANTS
CIVIL CONSPIRACY

122. Plaintiff hereby incorporates averments 1 through 121, *supra*, as though set forth fully herein at length.

123. All Defendants had a common purpose of unlawfully authoring, publishing, promoting, and distributing false and defamatory statements and/or insinuations of and concerning Plaintiff.

124. As set forth fully above, all Defendants knew or should have known that the statements and/or insinuations about Plaintiff and the characteristics attributed to Plaintiff were false, and nonetheless took overt acts in furtherance of their common goals and purposes.

125. However, in an effort to author, publish, promote, and distribute such false defamatory statements and/or insinuations, Defendants ignored the truth, failed to investigate the truth, and/or purposely made false statements and/or insinuations about Plaintiff with malice and without legal justification.

126. All Defendants each benefitted from the publication of the false defamatory statements and/or insinuations.

127. As a direct and proximate result of Defendants' unlawful acts and conspiracy to defame Plaintiff, he has suffered substantial harm and damage to his reputation, including but not limited to two (2) heart attacks, and the denigration of his reputation for honesty and trustworthiness.

128. As a further direct and proximate cause of Defendants' actions, Plaintiff has suffered and will continue to suffer severe emotional, physical and/or psychological harm, as well as lost earning capacity in his future professional endeavors.

129. Defendants' conduct as described herein was clearly outrageous, shocking, intentional, and done with actual malice, justifying punitive damages.

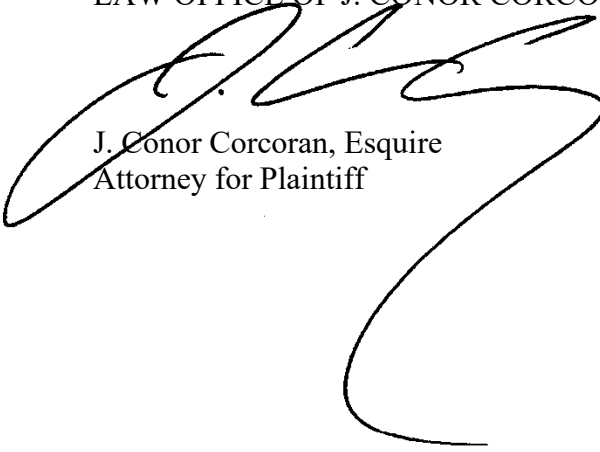
WHEREFORE, Plaintiff requests judgment in his favor against Defendants, jointly and severally, in an amount in excess of \$50,000 sufficient to fully compensate him, together with punitive damages, interest, costs of suit, and such further relief deemed equitable and just.

A JURY TRIAL OF EIGHT (8) JURORS IS HEREBY DEMANDED

Respectfully Submitted,

LAW OFFICE OF J. CONOR CORCORAN, P.C.

Date: November 1, 2021



J. Conor Corcoran, Esquire
Attorney for Plaintiff

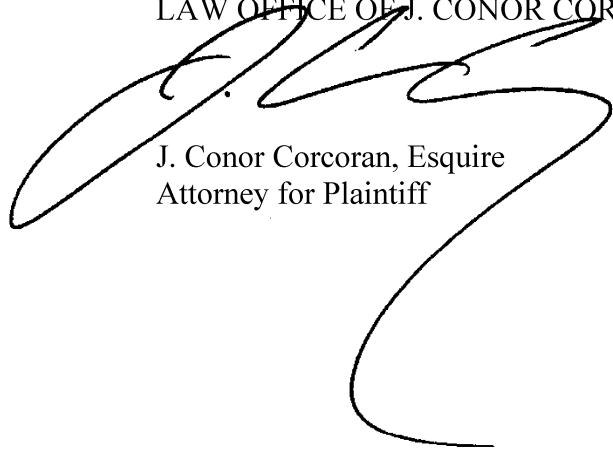
VERIFICATION

I, J. Conor Corcoran, hereby verify that I am the attorney for the Plaintiff; that I have read the averments in the foregoing document, and they are true and correct to the best of my knowledge, information, and belief; and that I make this Verification subject to 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

Respectfully Submitted,

LAW OFFICE OF J. CONOR CORCORAN, P.C.

Date: November 1, 2021



J. Conor Corcoran, Esquire
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I, J. Conor Corcoran, hereby certify that a true and correct copy of the foregoing document was sent to the following people via First Class Mail:

DONALD J. TRUMP

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and

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and

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Respectfully Submitted,

LAW OFFICE OF J. CONOR CORCORAN, P.C.

Date: November 1, 2021



J. Conor Corcoran, Esquire
Attorney for Plaintiff