

<p>DISTRICT COURT, DENVER COUNTY, COLORADO 1437 Bannock Street Denver, CO 80202</p>	<p>DATE FILED: September 17, 2021 8:12 PM FILING ID: E9E5DD591D201 CASE NUMBER: 2020CV34319</p>
<p>ERIC COOMER, Ph.D., Plaintiff</p> <p>vs.</p> <p>DONALD J. TRUMP FOR PRESIDENT, INC., et al., Defendants</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
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<p style="text-align: center;">EXHIBIT M-1</p>	

1 DISTRICT COURT, CITY AND COUNTY OF DENVER
STATE OF COLORADO
2 1437 Bannock Street
Denver, Colorado 80202

3 ^ COURT USE ONLY ^

4
ERIC COOMER, Ph.D., Case Number 2020CV034319
5 Plaintiff,

Courtroom 409

6 vs.

7 DONALD J. TRUMP FOR PRESIDENT, INC.,
SIDNEY POWELL, SIDNEY POWELL, P.C.,
8 RUDOLPH GIULIANI, JOSEPH OLTMANN,
FEC UNITED, SHUFFLING MADNESS MEDIA, INC.,
9 dba CONSERVATIVE DAILY, JAMES HOFT,
TGP COMMUNICATIONS LLC, dba THE GATEWAY PUNDIT,
10 MICHELLE MALKIN, ERIC METAXAS, CHANEL RION,
HERRING NETWORKS, INC. dba ONE AMERICA
11 NEWS NETWORK, and NEWSMAX MEDIA, INC.,
Defendants.

12
13 VIDEO-RECORDED REMOTE 30(b)(6) DEPOSITION OF
DONALD J. TRUMP FOR PRESIDENT, INC.,
14 BY SEAN RAY DOLLMAN

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16 Ingrid DeFranco
Abbie Frye
17 Alex Cannon
Eric Coomer, Ph.D.
18
19
20
21
22
23
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1 PURSUANT TO WRITTEN NOTICE and the
2 appropriate rules of civil procedure, the video-recorded
3 remote 30(b)(6) deposition of Donald J. Trump for
4 President, Inc., by SEAN RAY DOLLMAN called for examination
5 be the Plaintiff, was taken with all parties appearing remotely,
6 commencing at 3:19 p.m., on August 9, 2021, before
7 Kimberly Smith, Registered Professional Reporter and
8 Notary Public in and for the State of Colorado.
9
10 I N D E X
11
12 EXAMINATION: PAGE
13 By Mr. Bowman 8
14 EXHIBITS: PAGE
15 Exhibit 62 Transcript: 'Fox News Sunday' Interview with President Trump 18
16 Exhibit 63 Election Night Video 22
17 Exhibit 64 Tweet from President Trump 28
18 Exhibit 65 Giuliani Four Seasons Landscaping Press Conference 29
19 Exhibit 66 President Trump Twitter 38
20 Exhibit 68 Email to Parkinson and Others from Cleary, Subject: RE: Project, 11/14/2020, with attached emails, with attachment 39
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1 Exhibit 74 Plaintiff's Notice of Intention to Take Oral and Videotaped Deposition of the Authorized Representative(s) of Defendant Donald J. Trump For President, Inc. 16
2
3
4 PREVIOUSLY MARKED EXHIBITS:
5 Exhibit 3 Press Conference, 11/19 58
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1 PROCEEDINGS
2 THE VIDEOGRAPHER: Here begins the
3 deposition of Sean Dollman, as the corporate
4 representative for Donald J. Trump For President, Inc.
5 Today's date is August 9, 2021; and the time is
6 3:19 p.m. Mountain Time.
7 Will counsel please identify themselves for
8 the record, after which the court reporter will swear
9 in the witness.
10 MR. BOWMAN: Zach Bowman here for Plaintiff
11 Dr. Eric Coomer.
12 MR. ZAKHEM: John Zakhem on behalf of the
13 Defendant Donald J. Trump For President, Inc.
14 THE REPORTER: Is that it?
15 (No response.)
16 THE REPORTER: Okay. I will have a brief
17 statement, just allowing me to swear in Mr. Dollman
18 remotely; and then I will swear him in.
19 All counsel participating in this
20 deposition acknowledge that I am not physically
21 present with counsel nor the deponent and that I will
22 be reporting this deposition and swearing in the
23 deponent remotely.
24 In lieu of an oath administered in person,
25 the witness declares that his testimony in this matter

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1 is being given under penalty of perjury. The parties
2 and their counsel consent to this arrangement and
3 waive any objections to this manner of reporting and
4 manner of providing an oath.
5 Counsel, please indicate your agreement by
6 stating your name and your agreement on the record;
7 and then I will swear in the witness.
8 MR. BOWMAN: Zach Bowman for Plaintiff.
9 Agrees.
10 MR. ZAKHEM: This is John Zakhem. We've
11 had a practice in previous -- since there's so many of
12 us, just saying, Does anyone object? No one ever
13 does. And then we can just move forward.
14 THE REPORTER: Perfect. Does anyone
15 object?
16 (No response.)
17 THE REPORTER: Thank you.
18 MR. BOWMAN: And before we get into the
19 actual deposition, let me deal with a housekeeping
20 matter. I know the last deposition went long.
21 And I've spoken with Mr. Zakhem about the
22 possibility of needing to continue this, because I
23 understand he has a 5:15 part out on this, Western --
24 or Mountain Time.
25 So we've discussed continuing this, if

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1 necessary, on Friday, after the Metaxas deposition, if
2 we need additional time within that three-hour time
3 span.
4 So I thought -- let's see if -- is that
5 working for all counsel?
6 MR. ZAKHEM: I'm going to have to talk with
7 my client about that, Zach. That was you and me
8 texting. But if it works for my client, that will
9 work for me.
10 MR. BOWMAN: Okay. Well, maybe during the
11 break, let's do that and get that on the record before
12 we end today.
13 MR. ZAKHEM: Sure. The one other thing
14 that we've done as a matter of courtesy and efficacy
15 on all these prior depositions is that any objection
16 spoken by any counsel is joined by any of the other
17 counsel not responding.
18 MR. BOWMAN: That's fine.
19 SEAN RAY DOLLMAN
20 having been first duly sworn, was examined and
21 testified as follows:
22 EXAMINATION
23 BY MR. BOWMAN:
24 Q Good afternoon, almost evening, Mr.
25 Dollman. How are you today?

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1 A I'm pretty good, sir. Yourself?
2 Q Okay. Would you please state your full
3 name for the record.
4 A My name is Sean Ray Dollman.
5 Q Say your middle name again.
6 A Ray.
7 Q Ray, R-a-y?
8 A R-a-y. Yes, sir.
9 Q My name is Zach Bowman. I'm an attorney
10 for the plaintiff, Dr. Eric Coomer, in this case.
11 You understand this case involves claims
12 brought by Mr. Coomer against the Trump campaign and
13 other defendants for defamation, intentional
14 infliction of emotional distress, and conspiracy?
15 A Yes.
16 Q And you are here as a representative of the
17 Trump campaign; is that correct?
18 A Yes, sir.
19 Q And so when I use the shorthand of "the
20 campaign," you understand I'm referring to Donald J.
21 Trump For President, Inc., correct?
22 A Yes, sir.
23 Q And have you ever given your deposition
24 before?
25 A One other time.

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1 Q What was that one other time?
2 A When, did you say, sir?
3 Q Yeah. What kind of case was it, what type
4 of matter?
5 A It was another employee with DJTFP -- or
6 the campaign. So I was representing the campaign as
7 well.
8 Q Okay. So you have testified before as a
9 representative of the campaign?
10 A Yes, sir.
11 Q And that was a case brought by an employee
12 related to what?
13 A I believe it was the same -- to be honest
14 with you, I'm not really sure. I don't really
15 remember it. I think it was not from them; it was
16 from us. And it was a breach of confidentiality, I
17 believe.
18 Q I understand.
19 Well -- so you understand that a record is
20 being made today, and we'll need verbal answers; no
21 shaking your head. Even if there's an objection made
22 by your counsel, you can answer, unless he's
23 instructing you not to answer.
24 If you need a break, just let me know. I
25 know we started a little later than we were supposed

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1 to today. So if you need a break at any point, just
2 let me know. I'd just ask that you answer whatever
3 question is on the table before we take a break.
4 And if any of my questions confuse you or
5 need to be rephrased or restated or you didn't hear
6 it, then please let me know; and I'll be happy to
7 oblige.
8 Is there any reason or impairment that may
9 prevent you from answering questions truthfully today?
10 A No, sir.
11 Q Okay. Well, let's start with your
12 background. What is your role with the Trump
13 campaign?
14 A So I'm the CFO of the campaign. There's
15 not very many left on the campaign anymore. So I was
16 the CFO from twenty -- I think it was 2018 to 2020,
17 the end of the campaign.
18 Q And in serving as that CFO role today, what
19 are your primary duties?
20 A Just winding down the campaign. So we
21 already did a big chunk of winding everything down and
22 making sure that the -- we're able to close the doors
23 on the campaign.
24 Mainly, right now is just reporting -- like
25 FEC reporting; more the controller. We do get some

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1 invoices here and there that were either delayed or we
2 never received them, and we're just answering calls
3 and making sure that people are getting paid for
4 services that they performed for the campaign.
5 Q How much longer do you anticipate serving
6 in that role as CFO?
7 A You know, I'm not really sure how long this
8 will go. This is my first presidential campaign. I
9 know that the campaign can run for a little bit just
10 because of FEC reporting. But as this role, maybe
11 another half year to a year.
12 Q And you said only a few employees of the
13 campaign are left. Do you know about how many?
14 A Three.
15 Q Only three others?
16 A Yes, sir.
17 Q And what was your experience like leading
18 up to being CFO for the Trump campaign? What were
19 your positions before that?
20 A Within the campaign or, like, in my life?
21 Q Immediately prior.
22 A So I was the deputy director of operations
23 for the campaign in 2016, and then I was a director of
24 operations in 2017 and 2018.
25 So I apologize. Mr. Bowman, I need to go

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1 back. I think it was 2019, is when they labeled me
2 the CFO. I was a director of operations until then.
3 Q Do you know when in 2019?
4 A It would have been the beginning of the
5 year, maybe January, February.
6 Q And what sort of training or education have
7 you had to be CFO?
8 A So I have three degrees: one in
9 management, one in marketing, and one in finance.
10 I've been doing --
11 Q Can you tell me -- I'm sorry. Can you tell
12 me what each of those degrees are.
13 A Marketing.
14 Q I know. But are they -- what type of
15 degree?
16 A A bachelor's degree.
17 Q Bachelor's in marketing. And what else?
18 A Management and finance. It's actually
19 management and finance, two degrees, and a certificate
20 in marketing.
21 Q So you have two bachelor's degrees?
22 A Yes, sir.
23 Q And what were you prior to being director
24 of operations for the campaign in 2016?
25 A I was a deputy treasurer of the state of

Page 13

1 Arizona.

2 Q Had you worked on any campaigns prior to

3 the Trump campaign?

4 A I worked on a statewide campaign within the

5 state of Arizona for the treasurer.

6 Q Okay. So as the CFO, are you ever involved

7 in verifying information before it's published by the

8 campaign?

9 A It depends on the type of information. FEC

10 reports and whatnot, yes, sir.

11 Q What about allegations regarding election

12 fraud?

13 A No, sir.

14 Q Were you ever involved in any research or

15 finding information about the allegations concerning

16 election fraud?

17 A No, sir.

18 Q Did you ever communicate to any

19 representatives of the campaign what messages to

20 publish as to the allegations regarding election

21 fraud?

22 A Say that -- did I have any say in it? Is

23 that what you said, sir?

24 Q Yes. That's a good way of putting it.

25 A No, no. No, sir.

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1 Q Who had a say in that?

2 A At the time, I would think our comms

3 department. It really -- actually, I would think it

4 more depends on the time frame that you're asking

5 about.

6 Is it for post-election? Is that right?

7 Q Basically the whole time span leading up to

8 the election and after the election. And if it

9 changed, let me know.

10 A Yeah. I think we had a director of

11 communications, we had our leadership team, and then a

12 legal team as well.

13 Q Who was the director of communications?

14 A At the time, Tim Murtaugh.

15 Q I'm going to show you -- let me get my

16 share screen working. Hold on one second.

17 Okay. Are you able to see on my screen the

18 Notice Of Intention To Take Oral And Videotaped

19 Deposition?

20 A Yes. I'm assuming that's what this is,

21 since it says it is. So . . .

22 Q Yes.

23 A I don't see the bottom of it. But --

24 Q No, I understand. I'm just making sure you

25 can see that first page.

Page 15

1 I'm showing you what's been marked as

2 Plaintiff's Exhibit 74, which is the notice of intent

3 to take a representative of Donald J. Trump For

4 President.

5 And scrolling down, there's a list of

6 topics that we needed the expert to be -- or the

7 representative to be knowledgeable about or up to

8 speed on.

9 What did you do in preparation for this

10 deposition?

11 A Well, I read this, sir, and then worked

12 with legal counsel a little bit.

13 Q Did you review any other kind of documents?

14 A Yes, sir. I think they were the other

15 exhibits and some affidavits or other statements from

16 individuals.

17 Q Are there any of the topics here that you

18 feel you're not prepared to testify to?

19 A I feel like -- I feel like I'm pretty well

20 versed in some of them -- most of them, I would think.

21 Q Okay.

22 A Yeah.

23 Q And this is sort of a general question:

24 But in terms of the campaign as an entity, what is the

25 campaign's purpose?

Page 16

1 A Are you -- are you saying the campaign in

2 general or -- purpose now? Because there really is no

3 purpose now.

4 Q So leading up to the election and

5 immediately after.

6 A So, yeah, the campaign's purpose is to get

7 the President elected or the candidate elected. This

8 campaign's purpose was to get the President

9 re-elected.

10 Q Does the campaign have professional

11 standards, that you're aware of?

12 A We have policies and procedures.

13 Q What do those policies and procedures

14 outline?

15 A Just how we expect people to act --

16 Q Would they outline --

17 A -- how to --

18 Q -- how to handle communicating information

19 to the public?

20 A No. It has like verbiage in it about

21 individuals within the campaign and what they can and

22 cannot say based -- as a representative of the

23 campaign.

24 Q And what did those procedures and policies

25 say regarding what you can and cannot say?

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1 A That it has to be approved prior to
2 posting.
3 Q Approved by whom?
4 A Normally the comms department.
5 Q So I'm showing you what's been marked as
6 Exhibit 62. And I just want to briefly spend a little
7 bit of time on this. I'm going to skip down to page
8 24.
9 Are you aware that there were statements by
10 President Trump even before the election that he
11 believed there would be election fraud?
12 A Well, this is my first time seeing this.
13 It sounds like it. It looks like it. I'll be honest
14 with you: I didn't really pay a whole lot of
15 attention to the news and everything and the
16 statements. I've stuck to budgets. But I could see
17 how you could say that.
18 Q So you'll see in this interview that he was
19 giving to Fox News on July 19 of 2020, where he
20 states -- when he's asked, Are you gracious, he says,
21 You don't know until you see. It depends. I think
22 mail-in voting is going to rig the election. I really
23 do.
24 Chris Wallace said, Are you suggesting you
25 might not accept the results of the election? And
Page 18

1 Trump said, No. I have to see.
2 So even before the election, you'd agree
3 there were allegations by President Trump that the
4 election could be fraudulent, correct?
5 MR. ZAKHEM: Object to form and foundation.
6 And what topic are we on now?
7 MR. BOWMAN: This is background, that goes
8 to the malice that we're getting discovery on.
9 MR. ZAKHEM: Okay. President Trump is not
10 part of Donald J. Trump For President, Inc., just for
11 the record.
12 Q (By Mr. Bowman) Well, that's a -- that
13 leads to a good question: Is -- is Donald Trump a
14 representative of the Trump campaign?
15 A Are you asking me, Mr. Bowman?
16 Q Yes. Yes.
17 A Donald Trump is the candidate of the Trump
18 campaign.
19 Q So when he represents things to the public,
20 is he representing things on behalf of the campaign?
21 A I think being the candidate of the
22 campaign, he represents the campaign's, like, backing,
23 right?
24 So I would -- I would go with there are
25 things that he would say as a representative of the
Page 19

1 campaign; and while he was POTUS, there's things that
2 he said that represents the United States, right?
3 So in this distinction of, like, the
4 mail-in voting and rigging the election, what -- what
5 background on this particular document is the
6 President of the United States -- in election
7 integrity, or is it the campaign?
8 Q Well, I don't know -- I'm asking you: When
9 Donald Trump speaks about something regarding the
10 election, isn't he a representative of the campaign?
11 MR. ZAKHEM: Object to form and --
12 A I --
13 MR. ZAKHEM: Wait, wait, wait.
14 Object to form and foundation. If you're
15 asking him about this statement, I want him to read
16 the document.
17 MR. BOWMAN: The entire document?
18 MR. ZAKHEM: Well, yeah.
19 MR. BOWMAN: Well, let's just move on. I
20 think I got agreement that this was a representation
21 before the campaign. So let's go forward.
22 A Mr. Bowman, can you say that again. I'm
23 trying to figure out that I agreed that it was a
24 representation of the campaign.
25 Q (By Mr. Bowman) I'm sorry. I'm confused
Page 20

1 by your question.
2 A You said, Let it be known -- because I
3 don't -- I don't agree that it's a representation of
4 the campaign.
5 MR. ZAKHEM: Sean, his statements -- let me
6 just interject. His statements that aren't
7 interrogatories, aren't questions, you're not
8 responsible for; they don't matter.
9 THE DEPONENT: Oh, okay.
10 MR. BOWMAN: If he doesn't know, he doesn't
11 know. That's fine. But . . .
12 THE DEPONENT: I thought we agreed with a
13 conclusion or something and -- I didn't know we
14 had . . .
15 Q (By Mr. Bowman) So does Donald J. Trump
16 ultimately have a role in deciding what the campaign
17 publishes?
18 A No.
19 Q He has no role in deciding?
20 A No. The campaign, as an entity, would have
21 that role in what's being published or not.
22 Q Does what he wants published affect what
23 the campaign publishes?
24 A I think there's a consideration, but I
25 don't think -- it's not -- ultimately, the comms
Page 21

1 department and leadership runs the campaign.
 2 Q So are there times where Donald J. Trump
 3 would want something published by the campaign and the
 4 comms department would disagree?
 5 A There's some disagreements.
 6 Q Can you think of any relating to the
 7 election fraud allegations regarding Dominion and
 8 Mr. Coomer?
 9 A Not off the top of my head, no, sir.
 10 Q Let's skip forward to the actual election
 11 day. See, I'm still screen sharing. This is
 12 Plaintiff's Exhibit 63. I'm going to show you
 13 something starting at 5:30.
 14 So you're aware the election that night
 15 went late, and President Trump went on to speak
 16 publicly early in the morning.
 17 Do you recall that taking place?
 18 A Yes, sir.
 19 Q Were you president -- were you present with
 20 the campaign -- or not with the campaign, but with
 21 Donald J. Trump at this time?
 22 A No, sir.
 23 Q Where were you while this was happening?
 24 A Within the campaign office.
 25 Q Which is where?

Page 22

1 A Arlington, Virginia.
 2 Q So I'm going to start this at 5:30 and just
 3 play it for a minute.
 4 (A video was played:)
 5 PRESIDENT TRUMP: So we won by 107,000
 6 votes, with 81 percent of the vote. That's Michigan.
 7 So when you take those three states in particular and
 8 you take all of the others -- I mean, we have -- we
 9 have so many -- we had such a big night.
 10 You just take a look at all of these states
 11 that we've won tonight, and then you take a look at
 12 the kind of margins that we've won them by.
 13 And all of a sudden -- it's not like we're
 14 up 12 votes, and we have 60 percent left. We won
 15 states. And all of a sudden, I said, What happened to
 16 the election? It's off.
 17 And we have all these announcers saying,
 18 What happened? And then they said, Oh. Because you
 19 know what happened? They knew they couldn't win; so
 20 they said, Let's go to court.
 21 And did I predict this? Did I say this?
 22 I've been saying this from the day I heard they were
 23 going to send out tens of millions of ballots. I said
 24 exactly -- because even if they were going to win or
 25 if they didn't win, they'll take us to court.

Page 23

1 So Florida was a tremendous victory:
 2 377,000. Texas, as we've said. Ohio -- look at this:
 3 Ohio, a tremendous state, a big state. I love Ohio.
 4 We won by 8.1 percent, (inaudible), almost 500,000
 5 votes.
 6 North Carolina: A big victory with North
 7 Carolina. And so we won there. We lead by 76,000
 8 votes, with almost nothing left. And all of a sudden,
 9 everything just stopped.
 10 This is a fraud on the American public.
 11 This is an embarrassment to our country. We were
 12 getting ready to win this election. Frankly, we did
 13 win this election. We did win this election. So our
 14 goal now is to --
 15 (A video was stopped.)
 16 Q (By Mr. Bowman) So I want to stop there.
 17 I wanted to focus on the statement that "This is a
 18 fraud on the American public." "Frankly, we did win
 19 this election."
 20 So as soon as the election is over, Donald
 21 J. Trump is alleging that there's been election fraud;
 22 is that correct?
 23 A It would appear so, yes, sir.
 24 Q Was that the position of the campaign at
 25 this time?

Page 24

1 MR. ZAKHEM: Object to form and foundation.
 2 Are you -- I'd just ask for a clarification: Are you
 3 asking whether or not that statement was made by the
 4 campaign or the campaign shared that view?
 5 MR. BOWMAN: Well, let me ask both.
 6 Q (By Mr. Bowman) Was this a statement by
 7 the campaign, in your opinion?
 8 A I think at this point in time, I would -- I
 9 would say that the campaign felt like there was some
 10 type of -- some type of fraud; but it depends on,
 11 like, what it is, you know.
 12 But I would say that the campaign did have
 13 a view and every- -- we just busted our backs
 14 for -- you know, I was there for a long time. A lot
 15 of people were there for a year. And you just lost an
 16 election.
 17 I mean, at this point in time, whatever
 18 time in the morning it is, yeah, I would think that a
 19 lot of people felt like -- that there was some type of
 20 fraud.
 21 Q So the campaign thought there was some type
 22 of fraud why?
 23 A Well, I think -- there was a lot of stuff
 24 going on this year, right, I mean, this last year, in
 25 2020, whether it's within states and the election in

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1 general, the different -- like he said earlier, the
2 mail-in ballots and when that was going to come in and
3 people not requesting them.
4 There's a lot of different things that
5 could roll into what one would consider fraud.
6 Q Right. And so I'm asking you, as the
7 representative of the campaign: At this time, what
8 is -- what led the campaign to believe that there was
9 fraud?
10 A I don't know the answer to that, sir.
11 Q Do you know who would know the answer to
12 that for the campaign?
13 A No, sir.
14 Q Is it still the position of the campaign
15 that it believes there was voter fraud?
16 A The campaign is over, right? So there is
17 no campaign entity that actually would have a position
18 on whether there was fraud or not.
19 Q Well, there's still an entity. I mean, I'm
20 deposing you today on behalf of the entity. And what
21 is the campaign's position regarding whether there was
22 voter fraud today?
23 MR. ZAKHEM: Object to form.
24 THE DEPONENT: Well -- I apologize. But
25 what does that mean, "Object to form"?

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1 MR. ZAKHEM: You can answer. I'm going to
2 be throwing objections around all over the place.
3 Unless I tell you, Don't answer, go ahead and answer.
4 THE DEPONENT: Okay.
5 A Mr. Bowman, I apologize. Are you saying --
6 you asked: Does the campaign still believe there was
7 some type of fraud within the election?
8 Q (By Mr. Bowman) Yes.
9 A Yes.
10 Q What type of fraud?
11 A I'm not real sure, sir. I believe that
12 part of the legal counsel at the time was -- our legal
13 counsel was, like, directing the team to look into
14 fraud, right, in anticipation for litigation. And I'm
15 not too sure on, like, what that outcome was.
16 Q Which legal counsel was directing the team
17 to look into that?
18 A For -- after the election, it was -- the
19 campaign's legal counsel at the time was Justin Clark
20 and Matt Morgan.
21 Q Were they directly employed by the
22 campaign, or were they at an outside firm?
23 A Matt Morgan was directly employed by the
24 campaign.
25 Q And what about Justin Cloud (sic)?

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1 A Clark. Justin Clark was the deputy
2 campaign manager and also worked with Elections, LLC.
3 Q And were they the main source of directing
4 the campaign to look into allegations regarding voter
5 fraud?
6 A I believe so, yes, sir.
7 Q Anyone else?
8 A No, sir. Not that I can think of.
9 Q So I'm going to show you Exhibit 64. This
10 comes out right around the same time, a tweet from
11 President Trump saying, They're trying to steal the
12 election.
13 Was there -- was there a decision within
14 the campaign to start alleging there was fraud before
15 knowing all the facts?
16 A Other -- I mean, there was -- like I said
17 before, legal counsel decided to investigate I think
18 it was Dominion in 2020, like the summer of 2020, in
19 preparation -- or in anticipation of litigation.
20 So I don't know all the facts and what came
21 of that. So I'm not too sure what facts did come of
22 that, as the campaign.
23 Q But at least on what we're looking at so
24 far, it looks like there's an allegation of fraud, but
25 it's not specific as to was exactly happened yet.

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1 Would you agree with that?
2 MR. ZAKHEM: Object to form and foundation.
3 That's not a campaign statement.
4 Q (By Mr. Bowman) Well, you said earlier
5 that the campaign did believe there was fraud at this
6 point, but wasn't sure exactly what had happened yet;
7 is that true?
8 MR. ZAKHEM: When are you talking about?
9 Object to form and foundation. At what time are you
10 talking?
11 MR. BOWMAN: We're still on November 4th.
12 MR. ZAKHEM: Are you asking about Exhibit
13 64, in particular?
14 MR. BOWMAN: Exhibit 64 and 63, that we
15 were just talking about, that there were allegations
16 regarding fraud. He said he understood that was the
17 campaign's position, but they were looking at the
18 facts.
19 Q (By Mr. Bowman) So my question is: They
20 were -- they believed there was fraud without looking
21 at all the facts yet; is that true?
22 A I believe that there were -- I believe they
23 were looking into the facts and believing there was
24 fraud.
25 Q And I'm going to play a part of Exhibit 65.

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1 Actually, before I do that: There were
2 reports around this time, a few days after the
3 election, of an official election defense fund.
4 What was that?
5 A At what time, sir?
6 Q A few days after the election.
7 A So -- I mean, this is -- I would -- I would
8 think it's pretty common in a campaign to have like a
9 recount fund, right, to make sure that things -- that
10 you raise funds in order to pay for recount expenses.
11 Q So funds were still being raised after
12 election day for what?
13 A Recount and litigation, sir.
14 Q And would all funds raised after election
15 day go toward actual litigation costs?
16 A What was that last part, sir?
17 Litigation --
18 Q Would all -- would all funds raised after
19 November 3rd go toward actual litigation costs?
20 A I mean, it -- for us, there was -- I
21 believe there was debt on the campaign and litigation.
22 So the funds that are raised to a recount fund are
23 raised for litigation.
24 And any funds that are raised to pay off
25 debt would only be paid -- to pay off debt. So a

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1 campaign can no longer raise funds for a campaign
2 after an election.
3 Q So if the campaign is raising funds for
4 challenging the election results or a recount or
5 litigation, would a portion of those be used to retire
6 debt from the campaign?
7 A You can't do that, sir. No.
8 Q So that was not done here?
9 A No, sir.
10 Q So you're saying any funds raised after the
11 election for litigation purposes -- I mean, when
12 fundraising emails go out, is it specifying that it's
13 for litigation purposes, or are people contributing
14 saying that it's specifically for litigation purposes?
15 How specific is it?
16 A So in the sense of funds being raised in
17 like a -- a -- What the heck is it called? -- a
18 disclaimer, it would say for that purpose.
19 If someone sends in a donation and with
20 that donation says they want it to go towards
21 something, they would -- we would have to allocate it
22 to what the donator or supporter would want it to go
23 to.
24 Q But if you're just getting donations
25 without that kind of restriction, you can apply it to

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1 whatever you want?
2 A Without a restriction -- I mean, we
3 can't -- we can't raise funds for the campaign
4 anymore. Like, we can't -- for the -- for the purpose
5 of campaigning, right?
6 Q So I guess that's what I'm asking: If
7 there were fundraising emails that said, you know, a
8 portion of that campaign contribution could be used to
9 retire debt from the campaign, is that something that
10 was still happening after November 3rd?
11 A A portion of a donation -- if someone
12 donated and the disclaimer said that these funds would
13 go to the campaign or DJTFFP, and it was -- no.
14 The issue -- I think it gets a little bit
15 more in the weeds on it. It's not like a blanket
16 statement of: If someone donated to a campaign, would
17 it be split between recount or the -- the debt on the
18 campaign?
19 The campaign itself, raising funds would go
20 towards recount; but you also have other people that
21 would donate to debt retirement.
22 So if you show a debt at the end of the
23 campaign but -- you can use funds raised, as long as
24 they're not allocated to recount, for debt retirement.
25 Q Okay. Thank you. That answers the

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1 question.
2 A All right.
3 Q So let me go ahead to Exhibit 65. Do you
4 recall the press conference that Rudy Giuliani held at
5 the Four Seasons Landscaping in Philadelphia?
6 A Can you -- can you play it for me? I'm not
7 sure --
8 Q Sure. So I'm going to skip ahead.
9 (A video was played.)
10 MR. GIULIANI: Wow, what a beautiful day.
11 Thank you. Thank you for coming. I'm here on behalf
12 of the Trump campaign. I'm an attorney for the
13 President.
14 I'll describe to you the first part of a
15 situation that is extremely -- extremely troubling.
16 (A video was stopped.)
17 Q (By Mr. Bowman) So I'm going to pause
18 right there. He just said, "I'm here on behalf of the
19 Trump campaign."
20 Do you agree that he was there on behalf of
21 the Trump campaign?
22 A What -- what time frame is this?
23 Q This is November 7th of 2020.
24 A I would agree that -- actually, I don't
25 know the time frame of it; but I would agree that Rudy

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1 was a surrogate and a speaker at times for the
2 campaign.
3 Q And in fact, he just said he was here on
4 behalf of the Trump campaign right there, correct?
5 A That's what he said, yes, sir.
6 Q Do you recall how there was sort of a
7 public snafu in terms of how this was supposed to be
8 at the Four Seasons, and it ended up at the Four
9 Seasons Landscaping?
10 A I did hear about it. Yes, sir.
11 Q Do you know who was responsible for making
12 the arrangement for this speech?
13 A No, sir.
14 Q So you don't know if the -- if your comms
15 department was involved in arranging this?
16 A No, sir.
17 Q We'll skip ahead a little on this video.
18 (A video was played:)
19 MR. GIULIANI: As a friend of mine says, I
20 don't believe in conspiracies, but I also don't
21 believe in coincidences. It's kind of funny that all
22 Republicans were rejected here and all Republicans
23 were rejected in Pittsburgh.
24 And it amounts to about -- gee, just about
25 the 700,000 votes that President Trump was ahead by

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1 two days ago that disappeared, shoo.
2 And we have no way of knowing, because we
3 were deprived of the right to inspect, if a single one
4 of those ballots is legitimate. That is unheard of,
5 it's illegal, it's unconstitutional, and we will be
6 bringing an action challenging that. I emphasize to
7 you it's only one of the many other infirmities of
8 this election.
9 I know this city has a sad history of voter
10 fraud. After all, Joe Frazier is still voting here.
11 It's kind of hard since he died five years ago, but
12 Joe continues to vote.
13 If I recall correctly, Joe was a
14 Republican, so maybe I shouldn't complain. But we
15 should go see if Joe is voting Republican or Democrat
16 now from the grave.
17 Also, Will Smith's father has voted here
18 twice since he died. I don't know how he votes,
19 because his vote is secret. In Philadelphia, they
20 keep the votes of dead people secret. At least that
21 is something that you can be commended for.
22 (A video was stopped.)
23 Q (By Mr. Bowman) So I'm going to stop right
24 there. It's a long 40-minute speech, and I just
25 wanted to play a segment for you.

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1 But within that minute, Rudy Giuliani was
2 representing that votes for Donald J. Trump had
3 disappeared and that there was some kind of fraud or
4 dead voters.
5 Do you know what the source of this
6 information was?
7 MR. ZAKHEM: I'm going to object to the
8 extent that it would call upon the witness to provide
9 any privileged communications or work product.
10 If he can answer without providing the
11 same, he can proceed.
12 A Mr. Bowman, would you mind -- are you
13 asking where -- say it again, please.
14 Q (By Mr. Bowman) Sure. Do you know the
15 source of the information that Rudy Giuliani just
16 spoke about regarding allegations of votes
17 disappearing and dead voters?
18 A No, sir. I know they -- like I said
19 before, legal counsel was looking into a lot of
20 different things, and then -- in anticipation of an
21 investigation or litigation; but I don't know where
22 the source is.
23 Q Did the campaign agree with these
24 statements?
25 A I don't know, sir.

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1 Q Well, who -- who would know that?
2 A I don't -- I mean, I think at this point in
3 time, what -- and I'm trying to figure out in my head
4 right now at what point in time was it that Rudy was
5 doing -- or Mr. Giuliani was doing more outside, like
6 this press conference, and what the approval chain was
7 at the time or who was approving Mr. Giuliani
8 speaking.
9 So I don't know where those facts of what
10 he's discussing came from.
11 Q So you don't know who was approving of him
12 speaking, correct?
13 A At this point in time, no, sir.
14 Q And you don't know if the campaign agreed
15 with these statements he just made?
16 A No, sir, I don't. I would say not -- not
17 to my knowledge. I don't have that info.
18 Q Did the campaign issue any kind of
19 correction or statement clarifying the things that
20 Rudy Giuliani just stated in that minute?
21 A Not to my knowledge.
22 Q Was the campaign paying attention to these
23 sort of statements?
24 A Yes, sir.
25 Q Was there any kind of internal

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1 communication at the campaign about these kind of
2 statements and whether there is a need to go on the
3 record and correct them?
4 MR. ZAKHEM: I'll object to the extent it
5 seeks privileged or work product information.
6 If you can answer without disclosing any of
7 that, please proceed.
8 A Again, Mr. Bowman, I lost track of what
9 that question was again.
10 Q (By Mr. Bowman) Was there any kind of
11 internal discussion about whether there was a need to
12 correct statements made by Giuliani at this Four
13 Seasons Landscaping press conference?
14 A I believe at this point in time, I mean,
15 right after an election, we were still investigating
16 what happened and trying to get facts together.
17 Q I'm going to show you Exhibit 66, where
18 Donald Trump tweets that Dominion deleted 2.7 million
19 Trump votes nationwide; and he cites as a source there
20 Chanel Rion and OAN.
21 Was OAN a source that the campaign
22 frequently relied on?
23 MR. ZAKHEM: Object to form and foundation.
24 This isn't a campaign statement.
25 Q (By Mr. Bowman) Do you -- is this a

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1 campaign statement by Donald J. Trump?
2 A It looks like a quote from Chanel Rion.
3 That's --
4 Q Was it the position of the campaign at this
5 time, on November 12th, 2020, that Dominion had
6 deleted 2.7 million votes?
7 A It looks like to me that President Trump is
8 just saying what Chanel Rion said. It looks like a
9 quote.
10 Q So -- okay. Let's move on from this. I'm
11 going to get to -- have you reviewed the documents
12 produced by the campaign in this litigation?
13 A I went through it. I didn't go in depth.
14 Q So I'm showing you what's been marked as
15 Exhibit 68, which is the batch of documents produced
16 by the campaign.
17 And I'm going to start at the beginning of
18 this email chain. On November 13th, Zach Parkinson
19 emails Jacki -- can you say that name for me, or not?
20 If you can't --
21 A No, sir.
22 Q -- Jacki Kotkiewicz, Dean Cleary, and Matt
23 VanHyfte, About to send you all a Dominion-related
24 project we need to look at, so don't head to the bar.
25 I'll send specific things we need to look into and

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1 substantiate or debunk.
2 Who is Zach Parkinson?
3 A He was the director of research for comms.
4 Q And then were Jacki, Dean Cleary, and Matt
5 VanHyfte each part of the research team?
6 A Yes, sir.
7 Q And so Zach sends a list of topics that he
8 wants them to look into regarding Smartmatic and
9 Dominion, allegations that they're tied to Venezuela,
10 et cetera. And this is at 6 p.m., on November 13th.
11 About three hours later, Dean Cleary
12 responds saying, We're making great progress. We've
13 got an 11-page document right now. It's slow and
14 tedious. I don't have an end prediction, but we got
15 maybe three-quarters of what you asked on paper.
16 So do you recall what the impetus -- or
17 what initiated the need for this research?
18 A I think at this point in time, it was
19 probably trying to track down any leads that we could
20 get.
21 Q Anything regarding election fraud, right?
22 A Sure.
23 Q And then Zach Parkinson says, "Let's cut
24 this off at 10:30. Have more dead voters we'll need
25 to get to in the morning."

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1 Do you know what that's in reference to?
2 A I would think he means -- it looks more
3 like a -- I wouldn't say joking around with it, but
4 there was a lot of talk about dead voters voting
5 within this election. So I would think he was just
6 referring to what we've been looking into.
7 Q So that's similar to the dead voters
8 allegation that Giuliani was making in the press
9 conference we just looked at, right?
10 MR. ZAKHEM: Object to form. Foundation.
11 A I think there was a lot of talk about
12 people who passed away that voted in this election. I
13 don't know if it ties directly to the same individuals
14 that Mr. Giuliani was talking about, but there's a --
15 there was a lot of discussion about looking into
16 people who passed away that voted in this election.
17 Q (By Mr. Bowman) So the campaign was
18 looking at multiple theories for trying to show that
19 the election was fraudulent?
20 MR. ZAKHEM: Object to form and foundation.
21 A I would -- I would say there's multiple
22 theories, and the campaign was just trying to weed
23 out -- and just -- we were looking into what possible
24 fraud there was.
25 Q (By Mr. Bowman) And you said, "weed out."

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1 Was there an attempt to weed out what were, you know,
2 completely invalid theories?
3 A I would say that it's -- we focused on
4 things that were more possible or something to prove,
5 right? So you can get -- you can quantify votes of
6 people who passed away, right?
7 So I would think that it's more of like
8 what -- a priority or other things -- you know, like
9 what things -- you have a list of priorities: which
10 ones are most important, which ones can we get done?
11 And that would probably be on that list of
12 things that they put together.
13 Q So were you a part of any of these
14 discussions at the time?
15 A No, sir.
16 MR. ZAKHEM: Object to foundation.
17 What discussions are we talking about?
18 MR. BOWMAN: Within this email.
19 A No, sir.
20 Q (By Mr. Bowman) So let me scroll down to
21 the actual memo that's attached to that email that
22 says, Dominion, Smartmatic, Sequoia, and Venezuela.
23 Just a few of the core findings here appear
24 to be Dominion and Smartmatic are independent
25 companies that split from each other. There's no

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1 apparent relationship between Smartmatic and the
2 Spanish company Indra. Dominion has not direct ties,
3 or should be no direct ties, to Venezuela.
4 And scrolling down, There's no evidence
5 that Dominion's CEO or any other leader of the group
6 has ties to Antifa.
7 And this is referring specifically to an
8 Internet rumor that Dominion's director of product
9 safety, Dr. Eric Coomer, had ties to Antifa. But
10 there it concludes: There's no evidence Coomer is a
11 member or has any ties to Antifa.
12 Did I identify some of those key points
13 correctly?
14 A Yes, sir.
15 Q So who was this memo ultimately circulated
16 to?
17 A In the time frame, in -- November 13th; was
18 it?
19 Q Thirteenth and 14th.
20 A Thirteenth and 14th. I would -- I would
21 say it went to our comms team and I would -- I would
22 think the legal team as well.
23 Q Do you know that, or are you saying that
24 should have happened?
25 A Should have happened given that it's a

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1 research department on something that we were trying
2 to track down as possible ties for it.
3 Q Do you know if this memo ever got to Rudy
4 Giuliani?
5 A No. I think this -- this is kind of where
6 things get a little different. When Rudy -- when Mr.
7 Giuliani -- I apologize. I've always called him Rudy.
8 So when Mr. Giuliani came in as legal -- or
9 as a lawyer, he -- he and his team took over a
10 conference room. And we spent, I mean, years setting
11 up an internal process of where documents would go,
12 who sees them, and then making sure that people review
13 them, and approvals.
14 But when Mr. Giuliani came in with his
15 team, the -- that whole approval chain, that whole --
16 everything pretty much went out the window.
17 And at this point in time, the campaign, as
18 an entity, as itself, was winding down; and so we had
19 a lot of people leaving the campaign.
20 The majority of individuals within the
21 campaign -- the last day was November 15th. That
22 doesn't mean that these individuals were in the
23 office. A lot of them cleaned out their desks or they
24 left. So there was a lot of moving parts.
25 And I think when -- I think when Mr.

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1 Giuliani came in, there wasn't that same approval
2 process and the documents flowing in the right
3 direction, that we set up for years.
4 So to answer your question: The likelihood
5 that Mr. Giuliani saw this is probably slim.
6 Q And can you pinpoint for me when the moment
7 in time is that things changed, where you said you had
8 a good document flow and then things weren't as good?
9 When was that switch?
10 MR. ZAKHEM: Object to form.
11 A I'm not too sure on the exact date. It was
12 obviously right after the election. We had a lot of
13 people moving.
14 Like I said before, we were on the -- the
15 campaign itself was winding down. We were liquidating
16 assets. We were just -- we were moving everything out
17 and trying to get ready to turn over an office.
18 And I'm not too sure on when that time
19 frame was when Mr. Giuliani came in with his team and
20 took over a conference room.
21 But I do know it would have been -- I don't
22 even want to -- I don't even want to guess on that
23 one, Mr. Bowman. It was right after the election. I
24 just don't know the time frame.
25 Q (By Mr. Bowman) Okay. So right after the

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1 election, sometime within a week or two after the
2 election?
3 A I'm not too sure, sir.
4 Q So before that time period, it was standard
5 practice for a memo like this to go to your comms
6 department; is that right?
7 A Yes, sir.
8 Q And then that ultimately would affect what
9 type of communications were made by the campaign,
10 right?
11 A Yes, sir.
12 Q But when Giuliani came in and other things
13 were going on, that chain wasn't necessarily going the
14 same way?
15 A Yes, sir.
16 Q And what about communications to the legal
17 department? Was that also similarly in an altered
18 state or disrupted state after the election?
19 A I think there was a -- there was a split --
20 on the legal department, I would -- in my mind, I'm
21 thinking the campaign legal department; is that
22 correct?
23 Q Right.
24 A The internal legal counsel, whatever.
25 There was a -- there was a separation between the two,

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1 with Mr. Giuliani and, like, the main campaign legal
2 team.
3 So the possibility that our legal team and
4 that structure -- let me backtrack real quick. So
5 when Mr. Giuliani came in, a lot of senior staff -- we
6 were on the 14th floor of the office in Arlington,
7 Virginia.
8 And when Mr. Giuliani came in with his
9 team, there was a number of personnel that moved up to
10 the 15th floor, a lot of leadership and some other
11 lawyers that were a part of the campaign.
12 And they all moved up to a different floor.
13 So there was a separation of communication. And the
14 likelihood that our legal team reviewed that doc is --
15 I don't know.
16 Q Do you mind --
17 THE DEPONENT: So real quick: I've got
18 like a 12-year-old dog who is just whining by the
19 door. I'm just going to let her out real quick.
20 MR. BOWMAN: Do you need to take a break
21 right now?
22 THE DEPONENT: I mean, it's up to you guys.
23 MR. BOWMAN: Or if you just want to let the
24 dog out real quick, that's fine.
25 MR. ARRINGTON: This is Barry Arrington.

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1 If he doesn't need a break, I do. So why don't we
2 take a five-minute break.
3 MR. BOWMAN: That's fine.
4 THE VIDEOGRAPHER: Going off the record.
5 The time is 4:19.
6 (Recess taken.)
7 THE VIDEOGRAPHER: Back on the record. The
8 time is 4:27.
9 Q (By Mr. Bowman) So, Mr. Dollman, I wanted
10 to revisit what we were just talking about. You said
11 it was standard practice for a memo like this to --
12 would it go to comms and then to legal, or what
13 exactly was the standard practice?
14 A With a memo like this, it would be comms --
15 so research is actually in the comms department. So
16 it would stay within its department, but it would go
17 to normally the director of comms.
18 Q And can you tell me --
19 A And --
20 Q -- tell me the director of comms again.
21 A Tim Murtaugh.
22 Q So it would go to Mr. Murtaugh. And then
23 what?
24 A And then normally -- I mean, if it was
25 something like this and it involved legal, I would

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1 think it -- normally it would go to legal, if it had
2 this type of information in it on the research side.
3 But it would be up to Tim Murtaugh within
4 comms to either delve in to make sure it gets to legal
5 or legal needs to see it or something.
6 Q And the purpose of getting it to comms and
7 legal would be to ensure that any statements made by
8 the campaign had this information available, right?
9 A Yeah, I would think with comms for sure.
10 Legal -- well, you guys know it usually takes a lot
11 longer to get something back from legal.
12 So the statements -- there's not usually a
13 whole lot from our legal department with statements.
14 So like a campaign itself would be comms, would be the
15 normal means of communicating this.
16 Q But the standard practice of getting this
17 to comms and to legal was disregarded when Rudy
18 Giuliani became part of the campaign office?
19 MR. ZAKHEM: Object to form.
20 A It meant -- it meant -- since it -- I do
21 not know if this made it to legal or any type of
22 verification. And when I say, "legal," I mean the
23 campaign legal, that we had in house.
24 Q (By Mr. Bowman) And who was the campaign
25 legal in house?

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1 A So that would be -- Matt Morgan was -- I
2 think he was chief counsel or something in 2020.
3 Q Who else?
4 A There was -- I mean, there was a decent
5 sized legal department. Normally, if it was Matt
6 Morgan -- I mean, he was more the director on it, so
7 it would probably just filter from there.
8 Q So should something like this have made it
9 to legal?
10 MR. ZAKHEM: Object to form. Foundation.
11 Calls for a legal conclusion.
12 Q (By Mr. Bowman) You can still answer.
13 Should this have made it to legal?
14 A I think everything at this point in time
15 should just be reviewed to make sure that we all have
16 everything en route, right?
17 So if it went to legal, should it have? I
18 haven't read the whole thing. Something like this,
19 what you just pointed out.
20 Q Right. And that's what I want to focus
21 on --
22 A I think it focused on -- say again?
23 Q Sorry. Go ahead.
24 A I think it depends on what legal's working
25 on or if they know about anything or if they're

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1 looking into this.
2 I mean, if it's Internet hearsay or
3 something -- the research team just wanted to review
4 it and see if there was any ties, then it may not go
5 to legal. But . . .
6 Q Are you saying this was Internet hearsay?
7 A Well, that's what you said earlier, right?
8 Q Well, I'm asking you.
9 A You said that they were researching it
10 because of the Internet, something. I believe it was
11 earlier in the emails.
12 Q So today, as you sit here as a
13 representative of the campaign, do you agree that
14 there's no evidence Coomer is a member or has any ties
15 to Antifa?
16 MR. ZAKHEM: Object to foundation and
17 privilege on attorney-client communication and work
18 product -- product.
19 To the extent the witness can answer
20 without divulging either of those, he can respond.
21 A I don't have a response.
22 Q (By Mr. Bowman) Well, let me ask again --
23 well, you don't have a response because your
24 understanding is it's been relayed to you through
25 counsel; is that correct?

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1 MR. ZAKHEM: Or that it's work product,
2 right?
3 Q (By Mr. Bowman) What about at this time:
4 on November 14th, 2020? The campaign knew that there
5 was no evidence Coomer was a member or had any ties to
6 Antifa, correct?
7 A I think with a quick research -- I wouldn't
8 say that the campaign knew that he didn't have any
9 ties to Antifa.
10 I think if, you know, you review the
11 Facebook, like, was it not elected; it must mean
12 deleted. There's a lot of evidence within the
13 Facebook; and I don't know if, like, they didn't see
14 that information.
15 But there's a lot of things where I
16 wouldn't say that Coomer is not a member of Antifa,
17 and I wouldn't say that -- is it Coomer or Coomer
18 (pronouncing)?
19 Q Coomer (pronouncing).
20 A Say again?
21 Q Coomer (pronouncing).
22 A Coomer (pronouncing).
23 I wouldn't say that -- I mean, I don't know
24 how they drew that conclusion, looking -- I mean, just
25 looking at his Facebook posts, in general.

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1 So, no, I don't think -- I don't think that
2 there is no evidence that he is absolutely not tied to
3 Antifa.
4 Q So you're disagreeing with the conclusion
5 from your research department?
6 MR. ZAKHEM: Object to form. Foundation.
7 A I think that within general of -- knowing
8 now and seeing the other documents that were given to
9 me for review, I would say that they might have jumped
10 and said that there's no evidence in -- that he's a
11 member or has ties to Antifa.
12 Q (By Mr. Bowman) What else was given to you
13 that changed your opinion?
14 MR. ZAKHEM: Object based on privilege and
15 work product.
16 To the extent you can respond without
17 divulging either of those, please proceed.
18 A Well, I think in general here were the
19 numerous Facebook posts by Coomer.
20 Q (By Mr. Bowman) But you're aware those
21 Facebook posts are part of this memo, correct?
22 A All of his Facebook posts?
23 Q Well, we have at least a couple here. So
24 you're disagreeing -- I just want to be clear: You're
25 disagreeing with your research department's conclusion

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1 that there was no evidence that Eric Coomer was a
 2 member of Antifa, and that's your position as a
 3 representative of the Trump campaign; is that correct?
 4 A Yeah, I -- that is correct.
 5 Q And what is that based on?
 6 MR. ZAKHEM: Object to privilege, both work
 7 product and attorney-client communication.
 8 MR. BOWMAN: Yeah, but this --
 9 MR. ZAKHEM: If you can answer without
 10 divulging either of those, please proceed.
 11 MR. BOWMAN: This is offensive use, John.
 12 I mean, you're using a privilege to say he disagrees
 13 with a document he's produced, but you're not telling
 14 me what evidence he's looked at.
 15 Do you have a response to that?
 16 MR. ZAKHEM: I'm just instructing the
 17 witness not to give you any privileged information.
 18 You can ask whatever questions you want.
 19 So long as he doesn't provide you with
 20 privileged information, you can ask anything and he
 21 can answer.
 22 Q (By Mr. Bowman) Okay. So all I'm asking
 23 is: What evidence have you seen that makes you
 24 disagree with the Trump campaign's research department
 25 that concluded Eric Coomer -- that there's no evidence
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1 that he's a member of Antifa?
 2 MR. ZAKHEM: Same objection. Same
 3 instruction.
 4 A And I guess my issue is: What evidence did
 5 this research department have at the time of making
 6 and drawing this conclusion and what type of time
 7 frame?
 8 I mean, we're looking at a very short
 9 window of when they turned this document around. And
 10 the -- the depth of his Facebook posts and, like, what
 11 he seems to know about Antifa -- maybe he follows them
 12 or something.
 13 But I wouldn't say there's absolutely no
 14 evidence that Coomer is -- has zero ties to Antifa.
 15 Q (By Mr. Bowman) So you're saying today
 16 that the Trump campaign research department did not
 17 have adequate time to adequately research whether
 18 Coomer had ties to Antifa?
 19 MR. ZAKHEM: Object to form.
 20 A In this time period, when the turnaround
 21 time was very quick, I don't -- I don't think they had
 22 an adequate amount of time for this document, to draw
 23 the absolute conclusion that there's no ties.
 24 Q (By Mr. Bowman) So they didn't have enough
 25 time to research the issue, but they did go on and
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1 make representations stating that Coomer was a member
 2 of Antifa; is that right?
 3 A Where is that at?
 4 Q Well, we're going to go through that next.
 5 But I'm asking you based on your memory.
 6 MR. REAGOR: Michael Reagor. Object to
 7 form.
 8 Q (By Mr. Bowman) So let's go to November
 9 17th, a couple days later. Eric Trump tweets about
 10 Eric Coomer and quotes that: Don't worry about the
 11 election. Trump's not going to win. I made F'ing
 12 sure of that.
 13 So now Eric Trump is representing that
 14 Coomer was on an Antifa conference call, and he's
 15 citing the report attached in that tweet from Gateway
 16 Pundit.
 17 Did Eric Trump get the memo that we just
 18 discussed?
 19 A Eric -- Eric Trump was not a part of the
 20 campaign.
 21 Q So you wouldn't circulate any kind of
 22 campaign memos to Eric Trump?
 23 A No, sir. He wasn't a part of the campaign.
 24 Q So when Eric Trump made representations
 25 regarding the campaign, he hadn't been provided any
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1 information from the campaign?
 2 MR. ZAKHEM: Object to form and foundation.
 3 What -- what representations are you
 4 talking about, Counsel?
 5 MR. BOWMAN: The one I have up on the
 6 screen.
 7 MR. ZAKHEM: And where does it say "Trump
 8 campaign" on there?
 9 Q (By Mr. Bowman) Is Eric Trump not trying
 10 to get Donald Trump elected?
 11 MR. ZAKHEM: Counsel, we can have a
 12 discussion or you can ask questions. If you're
 13 discussing with me whether or not an individual
 14 candidate or supporters of a candidate are part of a
 15 campaign legally under election law or under corporate
 16 law in the domestic jurisdiction, we can have that
 17 discussion online -- offline.
 18 But if you're asking the witness about a
 19 question that is intentionally trying to mislead him
 20 based on the facts of the exhibit in front of him, I'm
 21 going to continue to object and point out the
 22 misleading nature of the question.
 23 Q (By Mr. Bowman) So it's your position that
 24 Eric Trump was not a representative of the campaign;
 25 is that true?
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1 MR. ZAKHEM: It's our position that Eric
2 Trump was a surrogate speaker on behalf of his father,
3 a candidate --
4 MR. BOWMAN: Hold on. Why are you
5 answering this?
6 MR. ZAKHEM: Well, I thought you were
7 asking me.
8 MR. BOWMAN: No. I'm asking the deponent.
9 MR. ZAKHEM: Oh, my mistake. I apologize,
10 Counsel.
11 A Can you say that again, Mr. Bowman.
12 Q (By Mr. Bowman) Is it your position that
13 Eric Trump is not a representative of the campaign?
14 A I guess I'll follow the lead here. He was
15 a surrogate speaker for the campaign, as a
16 representative. He was not an actual campaign
17 employee.
18 Q What does this --
19 A So he did tweet -- it was a tweet on his
20 own personal account and not for the purpose of the
21 election, right?
22 Q Let's go back. So I've opened up Exhibit
23 3. This is a press conference on November 19th at the
24 RNC, where Rudy Giuliani says, "Good afternoon and
25 thank you very much for coming. This is

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1 representative of our legal team. We're representing
2 President Trump and we're representing the Trump
3 campaign."
4 Do you have any reason to disagree with
5 that statement?
6 MR. ZAKHEM: Object to form. Foundation.
7 Authenticity.
8 A Do I have any reason to disagree with --
9 that he was at the event -- or the press conference as
10 our lawyer? Is that --
11 Q (By Mr. Bowman) That he was -- I'll read
12 this one sentence: "We're representing President
13 Trump and we're representing the Trump campaign."
14 Do you disagree with that?
15 MR. ARRINGTON: This is Barry Arrington. I
16 object to form and foundation.
17 A The -- in this sentence here, when he says,
18 We are representing President Trump and we are
19 representing the Trump campaign, who is "We are"?
20 Q (By Mr. Bowman) Well, let's look back
21 earlier in this. He's -- Rudy Giuliani: "We're
22 representing President Trump and we're representing
23 the Trump campaign. When I finish, Sidney Powell and
24 then Jenna Ellis will follow me."
25 A Is that everybody?

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1 Q Also, Joseph and Jennifer, Victoria
2 Toensing here with me. There are a lot more lawyers
3 working on this, but I guess we're the senior lawyers.
4 And Boris Epsheyn.
5 So do you disagree that they are
6 representatives of the Trump campaign?
7 MR. ZAKHEM: Object to form. Foundation.
8 A As a whole, yes.
9 Q (By Mr. Bowman) Was Rudy Giuliani a
10 representative of the Trump campaign on November 19th,
11 2020?
12 A He was a lawyer for the Trump campaign.
13 Q When he states he's a representative, it
14 would be reasonable for a listener to assume that he's
15 a representative of the campaign, correct?
16 MR. ZAKHEM: Object to form.
17 A Reasonable.
18 Q (By Mr. Bowman) Do you recall who arranged
19 this press conference?
20 A No, sir.
21 Q Do you agree that Sidney Powell was a
22 representative of the Trump campaign?
23 A No, sir.
24 Q Why was she speaking, then, at the press
25 conference on behalf of the Trump campaign?

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1 MR. ZAKHEM: Object to form.
2 A That, I don't know, sir.
3 Q (By Mr. Bowman) Do you know who decided
4 that Sidney Powell would speak at this event?
5 A No, sir. Like I was telling you before,
6 there were no approval structures. There was no --
7 any back-end operational side on the campaign.
8 Rudy -- or Mr. Giuliani and his team kind
9 of did their own thing and -- which in this case, I
10 don't know who set up this press conference; I don't
11 know who authorized who would be in the press
12 conference.
13 I don't think there was anybody. And I
14 really think you would probably have to ask Mr.
15 Giuliani on who authorized the press conference and
16 who was standing with him.
17 Q So to your knowledge, the counsel for the
18 Trump campaign itself, that's not the Rudy Giuliani
19 team, was not part of arranging this press conference?
20 A To my knowledge, the counsel on the
21 campaign was not aware of the press conference or
22 arranging the press conference.
23 Q So when Giuliani came into the campaign and
24 started disrupting the normal flow of things, were his
25 legal team and the Trump campaign legal team not

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1 communicating about these kind of things?
 2 MR. ZAKHEM: Object to form.
 3 A Mr. Giuliani just -- he did his own thing
 4 with his team. And like I was telling you before,
 5 the -- a lot of the senior staff or -- who was
 6 remaining on the campaign still at that point in time
 7 went up to the 15th floor.
 8 And that was all before most of the team on
 9 Mr. Giuliani's team had COVID and then left the
 10 building, and we never saw them again within the
 11 building.
 12 Q (By Mr. Bowman) But he was still operating
 13 as an arm of the campaign?
 14 A Who is that, sir?
 15 Q Rudy Giuliani and his team.
 16 MR. ZAKHEM: Object to form.
 17 A He was a -- he was a lawyer for the
 18 campaign, yes.
 19 Q (By Mr. Bowman) So the normal process that
 20 we talked about earlier, where a representation would
 21 be made to the public; if you had research, it would
 22 go to comms, it would go to legal; and then somebody
 23 within that chain would release that information to
 24 the public, are you saying Rudy Giuliani and his team
 25 were operating completely independently of that chain?
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1 A Yes, sir.
 2 Q And so Rudy was not being given
 3 information, like the research we looked at in the
 4 memo, regarding Dominion and Eric Coomer?
 5 A That would -- yes, sir, that's what I
 6 believe.
 7 Q So the campaign had information regarding
 8 Dominion and Eric Coomer that it did not share with
 9 people who were acting as representatives of the Trump
 10 campaign --
 11 MR. ZAKHEM: Object to form. Foundation.
 12 Q (By Mr. Bowman) -- is that correct?
 13 A Can you say it one more time, Mr. Bowman.
 14 I apologize.
 15 MR. BOWMAN: Can the reporter read that
 16 back. I don't know if I could get that word for word.
 17 (The last question was read back as
 18 follows: "So the campaign had information regarding
 19 Dominion and Eric Coomer that it did not share with
 20 people who were acting as representatives of the Trump
 21 campaign --")
 22 A Yeah, I don't -- I don't -- I don't know if
 23 they shared it or didn't share it with them; because
 24 there was a separation and -- and I'm not sure.
 25 Q (By Mr. Bowman) Well, let's look at what
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1 else was said at this press conference. I'm going to
 2 scroll down to page 27.
 3 And Sidney Powell starts speaking on page
 4 27. This is Rudy Giuliani's production, Exhibit 3.
 5 "Thank you, Rudy. What we are really dealing with
 6 here and uncovering more day by day (sic) is the
 7 massive influence of Communist money through
 8 Venezuela, Cuba, and likely China in the interference
 9 with our elections here in the United States. The
 10 Dominion Voting Systems, the Smartmatic technology
 11 software, and the software that goes in our (sic)
 12 computerized voting systems here as well, not just
 13 Dominion, were created in Venezuela at the direction
 14 of Hugo Chavez to make sure he never lost an election
 15 after one Constitutional referendum came out the way
 16 he did not want it to come out."
 17 So does this directly conflict with the
 18 conclusions in the memo that we were looking at
 19 earlier?
 20 MR. ZAKHEM: Object to foundation.
 21 MR. REAGOR: Form. Michael Reagor.
 22 A This is Cindy -- Sidney Powell --
 23 Q (By Mr. Bowman) Yes.
 24 A -- who was not an attorney for the
 25 campaign?
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1 Q I'm not answering questions. I just asked
 2 if this conflicted with the memo that we were looking
 3 at earlier.
 4 A Your question of does it conflict with the
 5 memo from earlier, it does conflict with the memo from
 6 earlier, but Sidney Powell was not a lawyer for the
 7 campaign.
 8 MR. BOWMAN: Objection to that last part as
 9 nonresponsive.
 10 Q (By Mr. Bowman) Does it appear from
 11 reading this that Ms. Powell was given (sic) the memo
 12 from the campaign?
 13 MR. ZAKHEM: Object to form.
 14 A You asked is it clear that she was not
 15 given the memo? Is that what you said, sir?
 16 Q (By Mr. Bowman) Yes.
 17 A It does appear that she did not review an
 18 internal memo from the campaign.
 19 Q And you don't recall the campaign ever
 20 giving that memo to Ms. Powell?
 21 A No, sir.
 22 Q Skip ahead, specifically to page 32, where
 23 we start -- where Ms. Powell starts to talk about Eric
 24 Coomer: Speaking of Smartmatic's leadership, one of
 25 the Smartmatic patent holders, Eric Coomer, I believe
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1 his name is, is on the Web as being recorded in a
2 conversation with Antifa members saying that he had
3 the election rigged for Mr. Biden.
4 That statement right there, was that also
5 the position of the Trump campaign, or does that
6 conflict with the memo that we just looked at?
7 A That -- does it conflict with the memo of
8 the Trump campaign? Is that what you're asking?
9 Q Yes.
10 A In the memo from the campaign, did it
11 discuss a conversation with Antifa members?
12 Q Well --
13 A That's --
14 Q -- let's look at it. There is a conclusion
15 in the memo that there is no evidence that Coomer is a
16 member or has any ties to Antifa.
17 So when we're looking at Powell's
18 representations that he's on a conference call -- an
19 Antifa conference call -- let me get back to the
20 actual document.
21 So Ms. Powell is alleging he's on the Web
22 in a recorded conversation with Antifa members saying
23 he had the election rigged for Mr. Biden.
24 Does that appear to conflict with the
25 conclusions in the memo?

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1 A Yeah, I mean, in general, Sidney Powell
2 doesn't speak on behalf of the campaign and was not a
3 lawyer for the campaign.
4 Does it differ from the internal campaign
5 memo that was written? With -- like I said before,
6 like, I don't know how much time and effort was put
7 into it prior to for that one little statement; but,
8 yes, it does conflict.
9 MR. BOWMAN: Objection. Nonresponsive to
10 everything but "yes, it does conflict."
11 MR. ZAKHEM: How is that nonresponsive?
12 MR. BOWMAN: That's my objection.
13 MR. ZAKHEM: Object to form.
14 Q (By Mr. Bowman) Okay. Did the campaign
15 agree with this statement: that Mr. Coomer was
16 recorded on a call saying he rigged the election for
17 Joe Biden?
18 A Not to my knowledge.
19 Q And as he said earlier, the campaign was
20 looking at several theories of election fraud. If
21 this was a legitimate theory, does it seem like the
22 campaign would have included details on that in their
23 memo?
24 MR. ZAKHEM: Object to form. Speculation.
25 A Details on -- say it again, Mr. Bowman.

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1 Q (By Mr. Bowman) Well, let me ask it more
2 simply. You're here as a representative of the
3 campaign.
4 A Uh-huh.
5 Q Why did the campaign not include in its
6 memo details regarding this alleged Antifa conference
7 call where Mr. Coomer says he rigged the election?
8 A What was the beginning of that memo, that
9 first bullet point? Did it discuss the conference
10 call, where he said he rigged the election?
11 That's what I mean. I don't know how much
12 information within that memo that you're referring to
13 brought up anything and what Sidney said, right?
14 I mean, did that memo say he was not part
15 of a conference call?
16 Q Well, I was asking you that, because I
17 didn't see a specific reference to that. But if
18 the -- my question was: If the campaign is supposedly
19 pursuing alternative theories of election fraud, why
20 didn't they look at that phone call issue?
21 MR. ZAKHEM: Object to form.
22 A It's because we found about this phone call
23 that you're speaking of during the press conference.
24 Q (By Mr. Bowman) So November 19th was the
25 first time that the Trump campaign heard about this

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1 alleged phone call?
2 A That I'm aware of.
3 Q So let me -- that brings up an interesting
4 question. The first page of this memo was sent -- or
5 this email with the memo attached was sent on
6 November 14th.
7 Later in this document production, the memo
8 is sent again on December 13th of 2020. And from my
9 reading, it appears that the memo is the same.
10 Do you have any understanding that it's
11 different?
12 MR. ZAKHEM: Are you asking him to confirm
13 that?
14 MR. BOWMAN: Yes.
15 MR. ZAKHEM: Do you want to take the time
16 online to read it, or do you want to wait for him to
17 do that offline? Because we've got 15 minutes left.
18 MR. BOWMAN: Well, if we have 15 minutes,
19 then that question is on the table for Friday,
20 whenever -- or whenever we pick this up.
21 MR. ZAKHEM: Yeah, yeah.
22 THE DEPONENT: I'm not a quick reader, Mr.
23 Bowman. This would take a while.
24 Q (By Mr. Bowman) No, I understand. But you
25 said you had reviewed these documents before. I guess

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1 what I'm asking is: This document gets recirculated
 2 in December, so it's a month later.
 3 You're saying the campaign learned new
 4 information. Why isn't that kind of information
 5 discussed in this memo?
 6 A It's a very good question. I don't know
 7 the personnel that were still within the campaign at
 8 the time frame of December 14th versus November 13th
 9 or if this document was forwarded.
 10 Has anything changed on it? I would have
 11 to review it.
 12 Q So by December of 2020, some of this
 13 research team may have been gone?
 14 A It's possible. I would have to see who we
 15 had rolled off, people; because the campaign was no
 16 longer a functioning entity as a campaign.
 17 Q Well, even as of December, it was no longer
 18 a functioning entity?
 19 A Campaigning for the President of the United
 20 States? No, sir. So we didn't have -- we didn't
 21 retain everybody within the campaign. That -- that
 22 would be a poor use of donations and funds.
 23 Q So after the election, you didn't have the
 24 same personnel researching issues like this?
 25 A It would have been the same personnel; it

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1 just probably would have been less of them. And like
 2 I said, I don't have the entire, like, employee
 3 roll-off time period in front of me, so I -- I mean,
 4 I'm just speculating. I don't -- I can't confirm that
 5 all of them were still on the team.
 6 Q When did the campaign cease to be a
 7 functioning entity?
 8 A Functioning in -- I think that might
 9 have -- you might have taken my words wrong.
 10 Functioning as in the reelection of the President of
 11 the United States. That was November 15th. I believe
 12 I stated that earlier.
 13 That was the last day everybody within the
 14 campaign -- those who were no longer assisting in
 15 items such as this and other related, like,
 16 operational stuff, that's when they rolled off: was
 17 November 15th.
 18 Q But had Trump conceded the election at that
 19 point?
 20 A It's the campaign in general, right? I
 21 mean, we have -- November 4th is over. We don't
 22 keep -- we have hundreds of employees on the campaign.
 23 We have thousands of volunteers across the country.
 24 You wouldn't keep hundreds of employees all
 25 the way until you concede an election, right? I mean,

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1 you would roll off -- it would be, like I said
 2 earlier, a poor use of donations and funds that are
 3 entrusting us to do the right thing.
 4 And we had people that were no longer
 5 functioning in their normal capacity or their normal
 6 role, so there was no spot on the campaign anymore.
 7 Q The campaign was still raising funds,
 8 right?
 9 A Yeah, like we discussed, Mr. Bowman. That
 10 was for recount, right? So we have individuals who
 11 continue on the campaign to assist in recount matters.
 12 Some people, after a campaign, they leave.
 13 They find other jobs. They go back home. They have
 14 time frames. They have apartments that, you know,
 15 ended a lease. There's -- there's no guarantee that
 16 all the individuals would stay on.
 17 But in the sense of raising funds, you
 18 still had that recount account, where you were using
 19 it for litigation.
 20 Q Did it help the campaign raise funds to let
 21 people like Sidney Powell speak freely?
 22 MR. ZAKHEM: Object to form.
 23 A Yeah, I wouldn't -- I wouldn't have an
 24 answer to that. If it helped to raise funds because
 25 of a single individual?

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1 I think there was a lot of people within
 2 the United States that were -- wanted answers and
 3 wanted to entrust their funds and their money to the
 4 campaign, to look into it, right?
 5 They had nowhere -- not nowhere else to
 6 turn, but the President and the campaign was an entity
 7 that they put their donations and money behind before.
 8 Q (By Mr. Bowman) So the longer the Trump
 9 campaign was publicly advancing theories of election
 10 fraud, the longer it could justifiably raise money; is
 11 that true?
 12 MR. ZAKHEM: Object to form. Foundation.
 13 Where is -- where is this in the outline
 14 topics, by the way?
 15 MR. BOWMAN: I think fundraising is in the
 16 outline topics, and it relates to malice.
 17 Can the reporter read the question again,
 18 please.
 19 (The last question was read back as
 20 follows: "So the longer the Trump campaign was
 21 publicly advancing theories of election fraud, the
 22 longer it could justifiably raise money; is that
 23 true?")
 24 A So I mean, you would -- if you ended up
 25 ending any litigation or anything and just shut the

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1 doors, what would you be raising funds to do?
 2 I guess it's just like the end of the
 3 campaign: You're no longer raising funds because the
 4 campaign is over, right?
 5 So I don't think you continue to do
 6 anything just to raise funds. And that's what it
 7 sounded like your question was: Did we continue with
 8 litigation just to raise funds? No. We raised funds
 9 to do that.
 10 Q (By Mr. Bowman) Well, if you had stopped
 11 contesting the election, it would have been harder to
 12 continue raising funds, correct?
 13 A If there was a reason to stop contesting
 14 the election, we would no longer raise funds for it.
 15 So not harder; it just wouldn't have happened.
 16 Q And did the Trump campaign ever concede the
 17 election?
 18 A Not to my knowledge.
 19 Q Is it still the Trump campaign's position
 20 today that the election was somehow fraudulent?
 21 A Yes, sir.
 22 Q What is that opinion based on?
 23 A Just -- we have no underlying definite
 24 facts that it wasn't.
 25 Q You believe it was fraudulent because you

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1 have no underlying facts to support that it was not
 2 fraudulent. Is that your position?
 3 A Yeah.
 4 Q Did Eric Coomer influence the outcome of
 5 the election?
 6 A I don't know.
 7 Q After the November 19th press conference we
 8 were looking at, are you aware of the RNC discussing
 9 any concerns about liability if they continued to
 10 allow those kinds of press conferences to occur at the
 11 RNC?
 12 MR. ZAKHEM: Object to form.
 13 A The RNC is a separate entity. So, no, sir,
 14 I do not know what their discussions were.
 15 Q (By Mr. Bowman) Let me go back -- we got
 16 kind of pulled around. But let me go back to the
 17 transcript we were just discussing.
 18 Actually, before I do that: Have you seen
 19 before this "Joint Statement from Elections
 20 Infrastructure Government Coordinating Council & the
 21 Election Infrastructure Sector Coordinating Executive
 22 Committees" that was released on November 12th of
 23 2020?
 24 A No, sir.
 25 Q So this is from the Cybersecurity and

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1 Infrastructure Security Agency of the U.S. Government.
 2 And it states here that the November 3rd
 3 election was the most secure in American history.
 4 Right now, across the country, election officials are
 5 reviewing and double-checking the entire election
 6 process prior to finalizing the results.
 7 It goes down further to say, While we know
 8 there are many unfounded claims and opportunities for
 9 misinformation about the process of our elections, we
 10 can assure you that we have the utmost confidence in
 11 the security and integrity of our elections, and you
 12 should too. When you have questions, turn to the
 13 election -- I believe it says officials' trusted
 14 voices, as they administer elections.
 15 Was this a document that was considered by
 16 the Trump campaign around November 12th regarding its
 17 own allegations of election fraud?
 18 A Was this -- was this document circulated
 19 around November 12th in the Trump campaign? Is that
 20 what you're saying?
 21 Q I'm asking if the Trump campaign read this
 22 and considered it.
 23 A Not to my knowledge.
 24 Q Why would they not have read this if it
 25 comes from the U.S. Government?

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1 MR. ZAKHEM: Object to form and foundation.
 2 A Why would they not read this document on
 3 election integrity from the U.S. Government?
 4 Q (By Mr. Bowman) Yes.
 5 A Was it sent to them? Like, I don't know --
 6 I mean, what -- how did you find it? You know, did
 7 you have to go in and look it up or review it and -- I
 8 mean, I don't think it was mailed to them.
 9 I just don't know why the Trump campaign
 10 would go seek out -- who -- who wrote it?
 11 Q Well, all the authors are stated there.
 12 Your testimony is that you're not aware of
 13 the campaign ever receiving this document; is that
 14 correct?
 15 A To my knowledge.
 16 Q Do you agree that the Elections
 17 Infrastructure Coordinating Council would be a source
 18 worth considering if you're going to advance theories
 19 of election fraud?
 20 MR. ZAKHEM: Object to form and foundation.
 21 And, Counsel, I'm running on two minutes.
 22 A I think that all things need to be
 23 considered. When --
 24 Q (By Mr. Bowman) The campaign should have
 25 considered this, correct?

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1 MR. ZAKHEM: Object to form and foundation.
2 MR. BOWMAN: I don't know what else we can
3 get into in two minutes, but obviously I . . .
4 THE REPORTER: Did I get an answer to that
5 last question?
6 (The last question was read back as
7 follows: "The campaign should have considered this,
8 correct?")
9 MR. BOWMAN: What was the answer to that?
10 THE REPORTER: I didn't hear an answer.
11 A I mean, I don't -- would they have
12 considered it if they saw it? And I think anything
13 would have been reviewed by the campaign if it was
14 presented to them.
15 Q (By Mr. Bowman) So you're not aware that
16 Chris Krebs was an author of that document and that he
17 was fired a few days later?
18 A No, I am not, sir. No.
19 Q And you're not aware that this was a public
20 document? This is the first time you've seen it?
21 A The first time I've seen it, yes, sir.
22 Q So as a representative of the Trump
23 campaign, you're not prepared to testify as to the
24 Trump campaign's receipt and interpretation of this
25 document?

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1 A No, sir.
2 MR. ZAKHEM: Object to the form.
3 Q (By Mr. Bowman) What's the answer? I'm
4 sorry?
5 MR. ARRINGTON: I object to form and
6 foundation as well. It implies that the Trump
7 campaign has --
8 MR. BOWMAN: You can just say you object to
9 form, and then I can hear the answer. It was muffled
10 by the objections.
11 Q (By Mr. Bowman) What was the answer?
12 THE REPORTER: And who was that objecting?
13 MR. ZAKHEM: All of us.
14 MR. ARRINGTON: Barry Arrington. I think
15 that -- go ahead. Answer the question, if you can.
16 MR. BOWMAN: Did the court reporter get
17 down an answer? I just didn't hear it.
18 THE REPORTER: No -- oh, I heard, "No,
19 sir."
20 MR. BOWMAN: Okay. Thank you.
21 MR. ZAKHEM: All right. I've got to go.
22 MR. BOWMAN: All right. Do we have an
23 agreement between everybody to pick this up on Friday,
24 after the Metaxas deposition?
25 THE DEPONENT: Yeah, I've got to -- I've

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1 got to speak with my legal counsel on that one. I did
2 not prepare to reconvene at a later time.
3 MR. BOWMAN: Well, discuss that with him.
4 I understand that reconvening is somewhat agreed to;
5 it's just a matter of when.
6 So, John, will you check with your client,
7 and can you get back to us today?
8 MR. ZAKHEM: Yes.
9 MR. BOWMAN: Thank you.
10 MR. ZAKHEM: Thank you.
11 MR. BOWMAN: I'm sorry. Can you tell us
12 how much time we've used.
13 THE VIDEOGRAPHER: Should we go off the
14 record?
15 MR. BOWMAN: Yeah, that's fine.
16 THE VIDEOGRAPHER: We're adjourned for the
17 day. Going off the record. The time is 5:15.
18 (The following colloquy is off the video
19 record.)
20 THE REPORTER: And I just need to get
21 transcript orders on the record before everyone
22 leaves.
23 MR. ZAKHEM: I want one. John Zakhem.
24 THE REPORTER: Okay.
25 MR. BOWMAN: And Plaintiff wants one too,

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1 please.
2 MS. HALL: Kim, this is Andrea Hall for Joe
3 Oltmann, FEC United, and Shuffling Madness Media.
4 We'll take one.
5 MR. ARRINGTON: Barry Arrington for Sidney
6 Powell. We'll take an electronic.
7 MR. JOHNSON: Brad Johnson for OAN and
8 Chanel Rion. And we'll take an electronic as well.
9 MS. BOEHMER: Margaret Boehmer for Eric
10 Metaxas. We'll take an electronic as well.
11 * * * * *
12 WHEREUPON, the foregoing deposition was
13 concluded at 5:15 p.m. Total time on the record was
14 1 hour and 48 minutes.
15
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23
24
25

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1 I, SEAN RAY DOLLMAN, the deponent in the
 2 above deposition, do hereby acknowledge that I have read
 3 the foregoing transcript of my testimony, and state under
 4 oath that it, together with any attached Amendment to
 5 Deposition pages, constitutes my sworn testimony.
 6
 7 _____ I have made changes to my deposition
 8 _____ I have NOT made any changes to my deposition
 9
 10 _____
 SEAN RAY DOLLMAN
 11
 12
 13 Subscribed and sworn to before me this
 14 _____ day of _____, 20____.
 15 My commission expires:
 16 _____
 17
 18 _____
 NOTARY PUBLIC
 19
 20
 21
 22
 23
 24
 25

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1 CERTIFICATE OF DEPOSITION OFFICER
 2 STATE OF COLORADO)
 3 CITY AND COUNTY OF DENVER)
 4 I, Kimberly Smith, a Registered
 5 Professional Reporter and Notary Public within and for
 6 the State of Colorado, commissioned to administer oaths,
 7 do hereby certify that previous to the commencement of
 8 the examination, the witness was duly sworn by me to
 9 testify the truth in relation to matters in controversy
 10 between the said parties; that the said deposition was
 11 taken in stenotype by me at the time and place aforesaid
 12 and was thereafter reduced to typewritten form by me; and
 13 that the foregoing is a true and correct transcript of my
 14 stenotype notes thereof; that I am not an attorney nor
 15 counsel nor in any way connected with any attorney or
 16 counsel for any of the parties to said action nor
 17 _____ outcome of this action.
 18 _____ expires June 21, 2025.
 19
 20
 21 KIMBERLY SMITH
 Registered Professional Reporter
 Notary Public, State of Colorado
 22
 23
 24
 25

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1 1 Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.
 2 2 Corp Rep Sean Dollman Job No. 4752594
 3 3 E R R A T A S H E E T
 4 4 PAGE____ LINE____ CHANGE_____
 5 5 _____
 6 6 REASON_____
 7 7 PAGE____ LINE____ CHANGE_____
 8 8 _____
 9 9 REASON_____
 10 0 PAGE____ LINE____ CHANGE_____
 11 1 _____
 12 2 REASON_____
 13 3 PAGE____ LINE____ CHANGE_____
 14 4 _____
 15 5 REASON_____
 16 6 PAGE____ LINE____ CHANGE_____
 17 7 _____
 18 8 REASON_____
 19 9 PAGE____ LINE____ CHANGE_____
 20 0 _____
 21 1 REASON_____
 22 2 _____
 23 3 _____
 24 4 Corp Rep Sean Dollman , Donald J. Trump for PInc.
 Date
 25 5

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1 jszakhem@jacksonkelly.com
 2 August 12, 2021
 3 Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.
 4 DEPOSITION OF: Corp Rep Sean Dollman 4752594
 5 The above-referenced witness transcript is
 6 available for read and sign.
 7 Within the applicable timeframe, the witness
 8 should read the testimony to verify its accuracy. If
 9 there are any changes, the witness should note those
 10 on the attached Errata Sheet.
 11 The witness should sign and notarize the
 12 attached Errata pages and return to Veritext at
 13 errata-tx@veritext.com.
 14 According to applicable rules or agreements, if
 15 the witness fails to do so within the time allotted,
 16 a certified copy of the transcript may be used as if
 17 signed.
 18 Yours,
 19 Veritext Legal Solutions
 20
 21
 22
 23
 24
 25

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Colorado Rules of Civil Procedure
Chapter 4, Disclosure and Discovery
Rule 30

(e) Review by Witness; Changes; Signing. If requested by the deponent or a party before completion of the deposition, the deponent shall be notified by the officer that the transcript or recording is available. Within 35 days of receipt of such notification the deponent shall review the transcript or recording and, if the deponent makes changes in the form or substance of the deposition, shall sign a statement reciting such changes and the deponent's reasons for making them and send such statement to the officer. The officer shall indicate in the certificate prescribed by subsection (f)(1) of this rule whether any review was requested and, if so, shall append any changes made by the deponent.

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TRANSCRIPT · Published July 19, 2020

Transcript: 'Fox News Sunday' interview with President Trump

President Trump appeared on 'Fox News Sunday' with Chris Wallace on July 19, 2020

Fox News



President Trump defends response to COVID crisis in exclusive interview with Chris Wallace

Part 1 of Chris Wallace's exclusive interview with President Trump on 'Fox News Sunday.'

The following is a transcript of President Trump's July 19, 2020 interview with "Fox News Sunday."

CHRIS WALLACE, FOX ANCHOR: And hello again from Fox News in Washington. Today from the White House, we're on the president's patio just outside the Oval Office.

President Trump, you've agreed to answer all manner of questions, no subject off-limits. Thank you and welcome back to "FOX NEWS SUNDAY."

DONALD TRUMP, PRESIDENT OF THE UNITED STATES: Thank you very much.

WALLACE: Let's start with the surge of the coronavirus across the country in recent months. You still talk about it as, quote, "burning embers." But I want to put up a chart that shows where we are with the illness over the last four months. As you can see, we hit a peak here in April, 36,000 cases...

TRUMP: Cases.

WALLACE: ... a day.

TRUMP: Yes, cases.

WALLACE: Then -- then it went down and now since June, it has gone up more than double. One day this week 75,000 new cases. More than double...

TRUMP: Chris, that's because we have great testing, because we have the best testing in the world. If we didn't test, you wouldn't be able to show that chart. If we tested half as much, those numbers would be down.

WALLACE: But -- but this isn't burning embers, sir? This is a forest fire.

TRUMP: No, no. But I don't say -- I say flames, we'll put out the flames. And we'll put out in some cases just burning embers. We also have burning embers. We have embers and we do have flames. Florida became more flame like, but it's -- it's going to be under control.

And, you know, it's not just this country, it's many countries. We don't talk about it in the news. They don't talk about Mexico and Brazil and still parts of Europe, which actually got hit sooner than us, so it's a little ahead of us in that sense.

But you take a look, why don't they talk about Mexico? Which is not helping us. And all I can say is thank God I built most of the wall, because if I didn't have the wall up we would have a much bigger problem with Mexico.

WALLACE: But, sir, we have the seventh highest mortality rate in the world. Our mortality rate is higher than Brazil, it's higher than Russia and the European Union has us on a travel ban.

TRUMP: Yeah. I think what we'll do -- well, we have them under travel ban too, Chris. I closed them off. If you remember, I was the one that did the European Union very early.

But when you talk about mortality rates, I think it's the opposite. I think we have one of the lowest mortality rates in the world.

WALLACE: That's not true, sir. We, we, we have a -- we had 900 deaths on a single day...

TRUMP: We will take a look...

WALLACE: ... just this week...

TRUMP: Ready?

WALLACE: You, you can check it out.

TRUMP: Can you please get me the mortality rate?

TRUMP: Kayleigh's right here. I heard we have one of the lowest, maybe the lowest mortality rate anywhere in the world.

TRUMP: Do you have the numbers, please? Because I heard we had the best mortality rate.

TRUMP: Number, number one low mortality rate.

TRUMP: I hope you show the scenario because it shows what fake news is all about. Ok, go ahead.

WALLACE: OK, OK. I don't think I'm fake news but I will -- we'll put --

TRUMP: Yeah, you will --

WALLACE: -- put our stats on --

TRUMP: You said we had the worst mortality rate in the world --

WALLACE: I said you had --

TRUMP: -- and we have the best.

WALLACE VOICE OVER: All right. It's a little complicated. But bear with us. We went with numbers from Johns Hopkins University which charted the mortality rate for 20 countries hit by the virus. The US ranked 7th better than the United Kingdom but worse than Brazil and Russia.

WALLACE VOICE OVER: The White House went with this chart from the European CDC which shows Italy and Spain doing worse. But countries like Brazil and South Korea doing better. Other countries doing better like Russia aren't included in the White House chart.

WALLACE: California locking down again. Florida, deadliest day of the entire pandemic. Hospitals at capacity at a number of places around the country. Shortages of testing, shortages of personal protective equipment for nurses and doctors.

A lot of people say this is because we don't have a national plan. You talk about states. We don't have a national plan. Do you take responsibility for that?

TRUMP: Look, I take responsibility always for everything because it's ultimately my job, too. I have to get everybody in line.

Some governors have done well, some governors have done poorly. They're supposed to have supplies they didn't have. I supplied everybody.

Now we have somewhat of a surge in certain areas. And other areas we're doing great. But we have a surge in certain areas. But you don't hear people complaining about ventilators. We've got all the ventilators we can use. We're supplying them to other countries.

We go out into parking lots and everything, everybody gets a test. We find -- if we did half the testing -- with all of that being said, I'm glad we did it. This is the right way to do it. I'm glad we did what we're doing. But we have more tests by far than any country in the world.

WALLACE: But, sir, testing is up 37 percent.

TRUMP: Well, that's good.

WALLACE: I understand. Cases are up 194 percent. It isn't just that testing has gone up, it's that the virus has spread. The positivity rate has increased. There -- the virus is...

TRUMP: Many of those cases...

WALLACE: ... worse than it was.

TRUMP: Many of those cases are young people that would heal in a day. They have the sniffles and we put it down as a test. Many of them -- don't forget, I guess it's like 99.7 percent, people are going to get better and in many cases they're going to get better very quickly.

We go out and we look and then on the news -- look if you go back to the news, all of your -- even your wonderful competitors, you'll see cases are up. Cases are up -- many of those cases shouldn't even be cases. Cases are up because we have the best testing in the world and we have the most testing.

No country has ever done what we've done in terms of testing. We are the envy of the world. They call and they say the most incredible job anybody's done is our job on testing, because we're going to very shortly be up to 50 million tests.

You look at other countries; they don't even do tests. They do tests if somebody walks into the hospital, they're sick, they're really sick, they test them then, or they'll test them in a doctor's office. But they don't go around have massive areas of testing and we do. And I'm glad we do, but it really skews the numbers.

WALLACE: I'm, I'm going to do you a favor, because I'm sure a lot of people listening right now are going to say, "Trump, he tries to play it down, he tries to make it not being as serious as it is."

TRUMP: I don't play it – I'm not playing – no, this is very serious.

WALLACE: 75,000 cases a day.

TRUMP: Show me the death chart.

WALLACE: Well, I don't have the death chart.

TRUMP: Well, the death chart is much more important.

WALLACE: But I can tell you, the death chart is a thousand cases a day.

TRUMP: Excuse me, it's all too much, it shouldn't be one case. It came from China. They should've never let it escape. They should've never let it out. But it is what it is. Take a look at Europe, take a look at the numbers in Europe. And by the way, they're having cases.

WALLACE: I can tell you cases are 6,000 in the whole European Union.

TRUMP: They don't test. They don't test.

WALLACE: Is it possible that they don't have the virus as badly as we do?

TRUMP: It's possible that they don't test, that's what's possible. We find cases and many of those cases heal automatically. We're finding -- in a way, we're creating trouble. Certainly, we are creating trouble for the fake news to come along and say, "Oh, we have more cases."

Look, we do something that nobody's ever done. Not only the ventilators, where we're supplying them all over the world. We did a testing program the likes of which nobody's ever done before.

WALLACE: The head of the CDC, Dr. Redfield, said this on Tuesday.

TAPE: July 14, 2020

DR. ROBERT REDFIELD, CDC DIRECTOR: "I do think this fall and winter of 2020, 2021, are probably going to be one of the most difficult times that we've experienced in American public health."

WALLACE: Do you agree with Dr. Redfield?

TRUMP: I don't know and I don't think he knows. I don't think anybody knows with this. This is a very tricky deal. Everybody thought this summer it would go away and it would come back in the fall. Well, when the summer came, they used to say the heat -- the heat was good for it and it really knocks it out, remember? And then it might come back in the fall. So they got that one wrong.

They -- they got a lot wrong. They got a lot wrong. The World Health got a tremendous amount wrong. They basically did whatever China wanted them to. And we'll save now almost \$500 million a year, which is nice. But the World Health got a lot wrong.

WALLACE: But, this is one of the sharpest criticisms of you.

TRUMP: I agree.

WALLACE: People say that you talk about the world as you'd like to see it rather than follow the science.

TRUMP: No, I...

WALLACE: Well -- let me just, let me just ask the question, sir. Why on earth would your administration be involved in a campaign at this point to discredit Dr. Fauci, who is the nation's top infectious disease expert.

TRUMP: Because we're not. If one man from my administration doesn't like him because he made a few mistakes -- look, Dr. Fauci said, "Don't wear a mask." Dr. Fauci told me not to ban China, it would be a big mistake. I did it over and above his recommendation. Dr. Fauci then said, "You saved tens of thousands of lives" -- more than that. He said, "You saved tens of thousands of lives."

Dr. Fauci's made some mistakes. But I have a very good -- I spoke to him yesterday at length. I have a very good relationship with Dr. Fauci.

WALLACE: But -- but, sir, this week -- this weekend, your White House put out a series of statements, so-called mistakes that Dr. Fauci had made. One of your closest aids -- one of your right-hand men, Daniel Scavino, put out this -- you've seen this?

TRUMP: Well Dr., look, look...

WALLACE: Dr. -- Dr. -- 'Dr. Faucet,' which shows him as a leaker and an alarmist.

TRUMP: Well, I don't know that he's a leaker

WALLACE: Why, why would you do that?

TRUMP: He's a little bit of an alarmist. That's OK. A little bit of an alarmist.

WALLACE: He's a bit of an alarmist?

TRUMP: A little bit of an alarmist. Let's -- let me just say. Dr. Fauci at the beginning -- and again, I have a great relationship with him. I spoke with him at length yesterday. Dr. Fauci at the beginning said, "This will pass. Don't worry about it. This will pass." He was wrong. Dr. Fauci said, "Don't ban China. Don't ban China." I did. He then admitted that I was right.

WALLACE: But you made mistakes, too.

TRUMP: I guess everybody makes mistakes.

WALLACE: I was going to say, you said at one point...

TAPE: January 22, 2020

TRUMP: It's one person coming in from China, and we have it under control. It's going to be just fine.

TAPE: February 26, 2020

TRUMP: When you have 15 people. And the 15 within a couple of days is going to be down to close to zero, that's a pretty good job we've done.

TAPE: July 1, 2020

TRUMP: I think we're gonna be very good with the coronavirus. I think that at some point that's going to sort of just disappear. I hope.

TRUMP: I'll be right eventually. I will be right eventually. You know I said, "It's going to disappear." I'll say it again.

WALLACE: But does that – does that discredit you?

TRUMP: It's going to disappear and I'll be right. I don't think so.

WALLACE: Right.

TRUMP: I don't think so. I don't think so. You know why? Because I've been right probably more than anybody else.

WALLACE: Then there are masks. From the first day that the CDC said that people should wear masks on April 3rd, you said you weren't going to. You wore a mask for the first time in public...

TRUMP: Yes.

WALLACE: ...at Walter Reed this weekend. Question, the CDC says if everybody wore a mask for 4-6 weeks, we could get this under control. Do you regret not wearing a mask in public from the start, and would you consider – will you consider a national mandate that people need to wear masks?

TRUMP: No I want people to have a certain freedom, and I don't believe in that. No, and I don't agree with the statement that if everybody wear a mask everything disappears. Hey, Dr. Fauci said don't wear a mask. Our Surgeon General – terrific guy – said don't wear a mask.

Everybody who is saying don't wear a mask – all of sudden everybody's got to wear a mask, and as you know masks cause problems, too. With that being said, I'm a believer in masks. I think masks are good.

But I leave it up to the governors. Many of the governors are changing. They're more mask into – they like the concept of masks, but some of them don't agree. I do say this – schools have to open.

Young people have to go to school, and there's problems when you don't go to school, too. And there's going to be a funding problem because we're not going to fund – when they don't open their schools. We're not going to fund them. We're not going to give them money if they're not going to school. If they don't open.

WALLACE: Two points on that. First of all, what the Federal government gives is only – is 8 percent.

TRUMP: Ten percent and you know what – that's a lot of money.

WALLACE: And you're going to take – do you know where the money goes? It goes overwhelmingly to disadvantaged kids and children with disabilities.

TRUMP: Let the schools –

WALLACE: Why wouldn't you put -- send more money so the schools would be safer?

TRUMP: Chris, let the schools open. Do you ever see the statistics on young people below the age of 18? The state of New Jersey had thousands of deaths.

Of all of these thousands, one person below the age of 18 – in the entire state – one person and that was a person that had, I believe he said diabetes.

One person below the age of 18 died in the state of New Jersey during all of this – you know, they had a hard time. And they're doing very well now, so that's it.

WALLACE: The stimulus bill is running out at the end of this month.

TRUMP: Yes.

WALLACE: The Republicans say they want liability limits, which the Democrats don't like. You say that you want a payroll tax cut, which even some Republicans are cool to.

TRUMP: But a lot of Republicans like it, though.

WALLACE: Will you only sign a bill that has those two provisions?

TRUMP: Well, we're going to see. But we do need protections because businesses are going to get sued just because somebody walked in. You don't know where this virus comes from. They'll sit down at a restaurant. They'll sue the restaurant, the guy's out of business.

WALLACE: Right.

TRUMP: So we do need some kind of immunity. You do need it just like you need immunity for the police, OK, whether they like it or not. You need immunity for the police. But they do need a form of immunity. You don't know if they caught it. And nobody's ever going to be able to prove it one way or the other.

You can't put these – you know, the people that – look, the Democrats don't want to do that because they're total – they're totally captured by the lobby of lawyers. The lawyers' lobby is probably the most powerful in the country.

WALLACE: What about the payroll tax cut?

TRUMP: I want to see it. I want to see it.

WALLACE: And if it isn't in the bill?

TRUMP: I'll have to see but, yeah, I would consider not signing it if we don't have a payroll tax cut, yes.

WALLACE: Hot enough for you here, Mr. President?

TRUMP: It's hot. It's about, well, sort of almost record breaking stuff.

WALLACE: You know, we wanted to do it inside. This is your choice.

TRUMP: But I wanted you to sweat a little bit.

(LAUGHTER)

WALLACE: Well, we both are. There has been a spike in violent crime in America in recent weeks. We've seen deaths up in New York, deaths up in Chicago, shootings. How do you explain it and what are you going to do about it?

TRUMP: I explain it very simply by saying that they're Democrat-run cities, they are liberally run. They are stupidly run. We have forced them in Seattle to end the CHOP because, you know, we were going in that following day. You probably have heard it. We were getting ready to go in. We were all set, and when they heard that we were going they set their police force.

WALLACE: Liberal Democrats have been running cities in this country for decades.

TRUMP: Poorly.

WALLACE: Why is it so bad right now?

TRUMP: They run them poorly, it was always bad but now it's gotten totally out of control and it's really because they want to defund the police. And Biden wants to defund the police.

WALLACE: No he, sir, he does not.

TRUMP: Look. He signed a charter with Bernie Sanders; I will get that one just like I was right on the mortality rate. Did you read the charter that he agreed to with...

WALLACE: It says nothing about defunding the police.

TRUMP: Oh really? It says abolish, it says -- let's go. Get me the charter, please.

WALLACE: All right.

TRUMP: Chris, you've got to start studying for these.

WALLACE: He says defund the police?

TRUMP: He says defund the police. They talk about abolishing the police. They talk about illegal aliens pouring ...

WALLACE: I look, I look forward – I look forward to seeing that.

WALLACE: Meanwhile, the George Floyd murder has reignited the issue of racism in policing in this country. I want to give you a couple of statistics. Nationwide blacks are twice as likely, fewer in absolute numbers, but in terms of per capita, blacks are twice as likely to be shot and killed by police as whites are. In Minneapolis, over the last five years, police used force against blacks at a rate seven times that against whites.

Can you understand why blacks would be angry at that?

TRUMP: Of course I do. Of course I do. Many whites are killed also. You have to say that.

WALLACE: I understand that.

TRUMP: I mean, many, many whites are killed. I hate the sad – but this is going on for decades. This is going on for a long time, long before I got here. You know, if you look at what's gone on in Portland, those are anarchists and we've taken a very tough stand. If we didn't take a stand in Portland, you know we've arrested many of these leaders. If we didn't take that stand, right now you would have a problem like you, you – they were going to lose Portland. So let's see...

WALLACE: Ok, let's see.

TRUMP: ...what this says here: Prosecutions, sanctuary cities, incentivize illegal aliens, expand asylum, abolish immigration detention –

WALLACE: That's not –

TRUMP: No. I, I – we'll find it.

WALLACE: Ok.

TRUMP: This thing is many pages long.

TRUMP: End prosecution of illegal border crossers. Support deathly – and these are the worse things, sanctuary cities –

WALLACE: Sir, I'm not, I'm not, I'm not disagreeing with you on any of those. I'm disagreeing about defund police –

(WALLACE VOICE OVER: The White House never sent us evidence the Bernie-Biden platform calls for defunding or abolishing police—because there is none. It calls for increased funding for police departments—that meet certain standards. Biden has called for redirecting some police funding for related programs—like mental health counseling.)

WALLACE: This week you said that Black Lives Matter and the Confederate flag are both matters, issues of freedom of speech.

TRUMP: Yeah.

WALLACE: But in the case of the Confederate flag, there are a lot of people who say these were traitors who split from this country, fought this country in large part to preserve slavery. Is the Confederate flag offensive

TRUMP: It depends on who you're talking about, when you're talking about.

TRUMP: When people – when people proudly have their Confederate flags, they're not talking about racism. They love their flag, it represents the south, they like the south. People right now like the south. I'd say it's freedom of, of, of many things, but it's freedom of speech.

WALLACE: So you're not offended by it?

TRUMP: Well, I'm not offended either by Black Lives Matter. That's freedom of speech. And you know, the whole thing with cancel culture, we can't cancel our whole history. We can't forget that the north and the south fought. We have to remember that, otherwise we'll end up fighting again. You can't just cancel all...

WALLACE: But let me ask you this when it gets to be more than just cancel – well, maybe this is cancel culture. The National Defense Authorization Act, the NDAA, you have threatened to veto it because in the bill, and this was supported by Republicans as well as Democrats, it would rename army bases named for Confederate generals. Now this is a bill that funds military operations, it gives soldiers a pay raise.

TRUMP: Yeah.

WALLACE: You're going to veto that?

TRUMP: No, because they'll get their pay raise. Hey, look, don't tell me this. I got soldiers the biggest pay raises in the history of our military.

WALLACE: Understood.

TRUMP: I got soldiers brand new equipment, brand new jets, brand new rockets, brand new – \$2.5 trillion. I did more for the military than any president that's ever had this office.

WALLACE: But you're going to veto this bill?

TRUMP: Because I think that Fort Bragg, Fort Robert E. Lee, all of these forts that have been named that way for a long time, decades and decades...

WALLACE: But the military says they're for this.

TRUMP: ...excuse me, excuse me. I don't care what the military says. I do – I'm supposed to make the decision. Fort Bragg is a big deal. We won two World Wars, nobody even knows General Bragg. We won two World Wars. Go to that community where Fort Bragg is, in a great state, I love that state, go to the community, say how do you like the idea of renaming Fort Bragg, and then what are we going to name it

We're going to name it after the Reverend Al Sharpton? What are you going to name it, Chris, tell me what you're going to name it? So there's a whole thing here. We won two World Wars, two World Wars, beautiful World Wars that were vicious and horrible, and we won them out of Fort Bragg, we won out of all of these forts that now they want to throw those names away.

And, no, I'm against that, and you know what, most other people are. And I even – I don't believe in polls because I see the fakest polls I've ever seen, but that poll is a 64 percent thing, which actually surprised me. We won World Wars out of these military bases. No, I'm not going to go changing them, I'm not going to go changing them.

WALLACE: So you'll veto them?

TRUMP: I might. Yeah, I might.

WALLACE: At Mt. Rushmore on July 3rd, you said that we face a far-left fascism in this country and then you said this.

TAPE: July 3, 2020

TRUMP: Our children are taught in school to hate their own country and to believe that the men and women who built it we're not heroes, but that were villains.

WALLACE: You said our children are taught in school to hate our country. Where do you see that?

TRUMP: I just look at – I look at school. I watch, I read, look at the stuff. Now they want to change -- 1492, Columbus discovered America. You know, we grew up, you grew up, we all did, that's what we learned. Now they want to make it the 1619 project. Where did that come from? What does it represent? I don't even know, so.

WALLACE: It's slavery.

TRUMP: That's what they're saying, but they don't even know. They just want to make a change. Cancel culture – I hate the term, actually, but I use it

WALLACE: But are they teaching people to hate America?

TRUMP: Oh, I think so yeah, I think so. Look at the professors. Look at what's going on in the colleges. If a conservative goes on a college – and look, we have as many as them. Excuse me, I think to the best of my knowledge, we're sitting at the White House and the Oval Office is right behind me. We have as many as them.

WALLACE: Who's them?

TRUMP: The liberal radical left, and I'm not talking all – I think liberal, I could tell you I like a lot of liberal people. I like a lot of liberal governors and senators, but, but Chris, we have a radical left destructive ideology and it's being taught in our schools.

And don't act like you're surprised to hear this – there are books written about it, and we can't let that go on. We can't let them change the true meaning of what we're all about and that's what they're trying to do and I don't want it to happen. Not on my watch. It's not going to happen on my watch.

WALLACE: Mr. President, you'll be happy to know that Fox News has a new poll out today and you're going to be the very first person to hear about it. In the national horse race, Joe Biden leads you by 8 points, 49 percent to 41. That's 3, 4 points slimmer than it was a month ago. And on the issues, people trust Biden more to handle the coronavirus by 17 points, on race relations by 21 points, and even on the economy they trust Biden more by 1 point. I understand you still have more than a hundred days to this election, but at this point you're losing.

TRUMP: First of all, I'm not losing, because those are fake polls. They were fake in 2016 and now they're even more fake. The polls were much worse in 2016. They interviewed 22 percent Republicans. Well, how do you do 22 percent Republican? You see what's going on. I have other polls that put me leading, and we have polls where I'm leading. I have a poll where we're leading in every swing state. And I don't believe that your -- first of all, the Fox polls, whoever does your Fox polls, they're among the worst. They got it all wrong in 2016. They've been wrong on every poll I've ever seen.

WALLACE: I -- I must tell you...

TRUMP: No, I'm just telling you. And let me ask you this, so on the economy -- so I've always led on the economy by a lot.

WALLACE: I know, which is why I was surprised by this number.

TRUMP: Biden can't put two sentences together. They wheel him out. He goes up -- he repeats -- they ask him questions. He reads a teleprompter and then he goes back into his basement. You tell

me the American people want to have that in an age where we're in trouble with other nations that are looking to do numbers on us.

WALLACE: So let me ask you a direct question.

TRUMP: No, no...

WALLACE: No, I'm going to ask you a direct question about Joe Biden. Is Joe Biden senile?

TRUMP: I don't want to say that. I'd say he's not competent to be president. To be president, you have to be sharp and tough and so many other things. He doesn't even come out of his basement. They think, "Oh this is a great campaign." So he goes in, I'll then make a speech, it'll be a great speech, and some young guy, starts writing, "Vice President Biden said this, this, this, this." He didn't say it. Joe doesn't know he's alive, OK? He doesn't know he's alive. Do the American people want that, number one. Number two, I built the greatest economy ever built anywhere in the world; not only of this country, anywhere in the world. Until we got hit with the China virus. We got hit with the virus, shouldn't have happened, and we had to close up, we saved millions of lives. Now we've opened it up, got to go back to school. We're open. We've got to do things. We had the best job numbers we've ever had last month. We should have good ones coming up in two weeks. Look, I built the greatest economy in history, I'm now doing it again. You see the numbers; the numbers are through the roof. The Democrats are purposely keeping their schools closed, keeping their states closed. I called Michigan, I want to have a big rally in Michigan. Do you know we're not allowed to have a rally in Michigan? Do you know we're not allowed to have a rally in Minnesota? Do you know we're not allowed to have a rally in Nevada? We're not allowed to have rallies.

WALLACE: Well, some people would say it's a health...

TRUMP: In these Democrat-run states...

WALLACE: But, wait a minute, some people would that it's a health risk, sir.

TRUMP: Some people would say fine

WALLACE: I mean we had some issues after Tulsa.

TRUMP: But I would guarantee if everything was gone 100 percent, they still wouldn't allow it. They're not allowing me to do it. So they're not -- they're not allowing me to have rallies.

WALLACE: But I've got to tell you, if I may, sir, respectfully, in the Fox poll, they asked people, who is more competent? Who's got -- whose mind is sounder? Biden beats you in that.

TRUMP: Well, I'll tell you what, let's take a test. Let's take a test right now. Let's go down, Joe and I will take a test. Let him take the same test that I took.

WALLACE: Incidentally, I took the test too when I heard that you passed it.

TRUMP: Yeah, how did you do?

WALLACE: It's not – well it's not that hardest test. They have a picture and it says “what’s that” and it’s an elephant.

TRUMP: No no no...

TRUMP: You see, that's all misrepresentation.

WALLACE: Well, that's what it was on the web.

TRUMP: It's all misrepresentation. Because, yes, the first few questions are easy, but I'll bet you couldn't even answer the last five questions. I'll bet you couldn't, they get very hard, the last five questions.

WALLACE: Well, one of them was count back from 100 by seven.

TRUMP: Let me tell you...

WALLACE: Ninety-three.

TRUMP: ... you couldn't answer -- you couldn't answer many of the questions.

WALLACE: Ok, what's the question?

TRUMP: I'll get you the test, I'd like to give it. I'll guarantee you that Joe Biden could not answer those questions.

WALLACE: OK.

TRUMP: OK. And I answered all 35 questions correctly.

WALLACE: You -- you talk about how you're winning, campaigns going well. Why did you replace Brad Parscale?

TRUMP: Because he's a great digital guy, we all like him a lot, but I have somebody that was involved – you know they were all on the 2016 campaign. We have Corey and we have all the people. And actually, Steve Bannon's been much better not being involved. He says the greatest president ever. I mean, he's saying things that I said, "Let's keep Steve out there, he's doing a good job." But they're all being -- they're all involved. If Joe Biden got in, first of all, he won't call the shots. The people -- the radical left people that's around him will call. Religion will be gone, OK? Life, you could forget about that, the whole question of life. Supreme Court...

WALLACE: When you say life, you mean abortion?

TRUMP: Absolutely. 100 percent. That whole question, which is a very -- you know, it's always been a 50-50 thing.

WALLACE: I understand.

TRUMP: It's actually trending a little bit more towards one side now.

WALLACE: When you say religion is going to be gone, what does that mean?

TRUMP: Well, look at what they're doing to the churches. They won't let the churches even open if they want to stand in a field six feet apart. We've had churches that wanted to stand in fields six feet apart. There has never been an administration that's done so much as I have, from tax cuts to regulation cuts to rebuilding the military to getting choice for the vets. Nobody's done the things I've done. Nobody. In three and a half years no other president's been able to do what I've done.

WALLACE: You're running in large part on the economy. You've built it once. Now we had the coronavirus. You're going to build it again. And in fact you had great jobs numbers in May, you had solid jobs numbers in June. But I want you to look at some projections. The nonpartisan Congressional Budget Office says the unemployment rate at the end of the year will be 10.5 percent. JPMorgan says in the fourth quarter GDP will contract by 6.2 percent. With states now rolling back some of the reopening and...

TRUMP: On purpose.

WALLACE: Well, there are a lot of Republican...

TRUMP: On purpose.

WALLACE: Well, there are a lot of Republican states, like Texas...

TRUMP: There is no reason...

WALLACE: And here's...

TRUMP: They'll be open very soon.

WALLACE: Let me just ask my question.

TRUMP: There's no reason for California to be doing what they're doing.

WALLACE: Alright.

TRUMP: Except for November 3rd.

WALLACE: With the states shutting back their reopening, in a lot of cases new lockdowns, won't the economy still be a problem for you on Election Day?

TRUMP: I don't think so. I think the economy is expanding and growing beautifully. Now, the Democrats want to keep it closed as long as possible because they think that's good for elections. But I think the economy is doing very well. Now we're coming back and we're coming back at a level that nobody would have thought possible. And we are -- and by the way, take a look at another, I mean, a gauge, whether you like it or not, the stock market. The stock market, NASDAQ hit its all-time high two weeks ago and has beaten it 14 different times, ok? The stock market, Dow, et cetera, is a thousand points away from its all-time high, meaning very close. We're gonna have a stock market perhaps on November 3rd that's the highest in history.

WALLACE: I want to talk to you about Obamacare. Since the pandemic hit, millions of people have lost their jobs and thereby lost their health insurance, and almost a half a million have signed up for Obamacare. Your administration just announced that you're signing onto a lawsuit to overturn Obamacare.

TRUMP: And replace it.

WALLACE: Why does it make sense to overturn Obamacare which people now are relying on? Democrats are going to say, "The man who wanted to kill Obamacare is going to take away your -- the protection for pre-existing conditions."

TRUMP: First of all, we got rid of the individual mandate.

WALLACE: I understand.

TRUMP: Pre-existing conditions will always be taken care of by me and Republicans, 100 percent.

WALLACE: But you've been in office three and a half years, you don't have a plan.

TRUMP: Well, we haven't had. Excuse me. You heard me yesterday. We're signing a health care plan within two weeks, a full and complete health care plan that the Supreme Court decision on DACA gave me the right to do. So we're going to solve -- we're going to sign an immigration plan, a health care plan, and various other plans. And nobody will have done what I'm doing in the next four weeks. The Supreme Court gave the president of the United States powers that nobody thought the president had, by approving, by doing what they did -- their decision on DACA. And DACA's going to be taken care of also. But we're getting rid of it because we're going to replace it with something much better. What we got rid of already, which was most of Obamacare, the individual mandate. And that I've already won on. And we won also on the Supreme Court. But the decision by the Supreme Court on DACA allows me to do things on immigration, on health care, on other things that we've never done before. And you're going to find it to be a very exciting two weeks.

WALLACE: Your niece, Mary Trump, has written a book about you and your family. And one of her main points is that she says your dad, Fred Trump, Sr., damaged the whole family and here's what she says about what you learned from your father—

TAPE:ABC News/GMA July 16, 2020

MARY TRUMP: He learned to become the killer you mentioned. Um the man who needs to succeed at all costs, who will do anything um to get attention, financial rewards, and to win.

WALLACE: Do you see any truth in that?

TRUMP: My father liked to win. My father was a very good man. He was a strong man. It's disgraceful that she said that. She was not exactly a family favorite. We didn't have a lot of respect or like for her. I would've never said that except she writes a book that's so stupid and so vicious and it's a lie. My father was a great, wonderful man.

WALLACE: Let me just ask you this question—

TRUMP: This is not a person that I spent very much time with, very little time, and now I'm glad.

WALLACE: You've developed a pretty thick skin over the years from decades of attacks in New York tabloids, now from the press here —

TRUMP: Yes.

WALLACE: — and your political opponents here in Washington. But even for Donald Trump, does it hurt you at all to be attacked in such personal terms?

TRUMP: Yeah

WALLACE: By a member of your own family?

TRUMP: It hurts me more about attacking my father, not being kind to my mother. I have a mother who was like a saint. She was incredible. She was an incredible woman. And she was nasty even to my mother. She's a very scarred person. She was not much of a family person.

But look, let me just tell you, my father was — I think he was the most solid person I've ever met. And he was a very good person. He was a very, very good person. He was strong but he was good. For her to say the kind of things, a psychopath, that he was a psychopath, anybody that knew Fred Trump would call him a psychopath?

And you know what, if he was I would tell you. And I would say, you know Chris, I was with my father and it was imposs— my father was — he was tough, he was tough on me, he was tough on all of the

kids. But tough in a--in a solid sense, in a really good sense. For her to say – I think the word she used was psychopath – what a disgrace. She ought to be ashamed of herself. That book is a lie.

WALLACE: Some people were surprised when you agreed to this interview, to sit down with me.

TRUMP: What are you going to ask?

WALLACE: Especially because of some of the mean tweets that you've said about me. Mike Wallace wannabe. Nasty and obnoxious. I will tell you after that one my son, Peter, who you've met, called and he said nasty, no, obnoxious, maybe.

(LAUGHTER)

WALLACE: But here's the question, one of your beefs seems to be that I put Democrats on the show and I ask them questions. And I guess the question I have is, don't you understand it's my job to put Democrats on as well as Republicans? And to ask them probing questions just like I ask Republicans?

TRUMP: I'm not a big fan of "Fox," I'll be honest with you. They've changed a lot since Roger Ailes. And I watch people like Swalwell, who I don't even know, he goes on the show, he got less than 1 percent, all of a sudden he's on – being interviewed for endless hours –

WALLACE: Yes, but I –

TRUMP: Not only him—

WALLACE: I interviewed Nancy--

TRUMP: I watched the nastiest people –

WALLACE: I interviewed, you sent one tweet after I interviewed Nancy Pelosi. And in the interview I asked her specifically about the fact in February you were in Chinatown pitching tourism while the virus was spreading.

TAPE: Fox News Sunday April 19, 2020

WALLACE: If the President underplayed the threat in the early days, Speaker Pelosi, didn't you as well?

WALLACE: Isn't that legitimate to

TRUMP: I would just say that--

WALLACE: --talk to the Speaker of the House?

TRUMP: I would just say that – look, I know you very well, I respect you a lot, I respect your father a lot. I thought he was one of the most talented journalists there are. And you likewise are a very talented person. I do think this, I think you are a very – I think you are toward the Democrat side, which is OK. I mean –

WALLACE: It's not true—It— watch the James Comey interview I did in December.

TAPE: Fox News Sunday December 15, 2019

WALLACE: Seventeen significant errors in the FISA process and you say it was handled in a thoughtful and appropriate way?

COMEY: Yeah, he's right I was wrong.

WALLACE: But you make it sound like you're a bystander- an eye witness- you were the director of the FBI while a lot of this was going on, sir.

COMEY: Sure, I'm responsible for that. That's why I'm telling you I was wrong. I was over confident as director in our procedures.

WALLACE: You couldn't do as tough an interview with Comey.

TRUMP: OK.

WALLACE: I'd like to think I treat everybody the same.

TRUMP: It just seems to me that you are very prone to be nice to the Democrats and maybe I'm wrong about that, Chris, but it's an honor to be with you it's fine, I love it. I love that it's close to 100 degrees out today –

WALLACE: Your choice again.

TRUMP: Yes, I know.

WALLACE: I'm not saying you're going to lose. I am not saying that. We saw how you turned it around last time.

TRUMP: I don't think I'm going to lose at all.

WALLACE: But if you did, how crushing would it be?

TRUMP: First of all, let me just tell you something, I know everyone wants to know that because they'd love to see me lose, finally.

WALLACE: I'm not – I am not saying that –

TRUMP: You know how many times I have been written off? Do you know how many times I've been written off?

WALLACE: I've done some of it myself, Sir.

TRUMP: My whole life –

WALLACE: I'm not doing it this time.

TRUMP: Don't do it because –

WALLACE: But how crushing would it be?

TRUMP: And you know why I won't lose, because the country in the end, they're not going to have a man who – who's shot. He's shot, he's mentally shot. Let him come out of his basement, go around, I'll make four or five speeches a day, I'll be interviewed by you, I'll be interviewed by the worst killers that hate my – my guts. They hate my guts. There's nothing they can ask me that I won't give them a proper answer to. Some people will like it, some people won't like it.

WALLACE: I agree with that.

TRUMP: But look –

WALLACE: You answer the questions.

TRUMP: Let Biden sit through an interview like this, he'll be on the ground crying for mommy. He'll say mommy, mommy, please take me home.

WALLACE: Well we've asked him for an interview, sir.

TRUMP: He can't do an interview. He's incompetent.

There's a number you don't mention. It's called the enthusiasm number. The enthusiasm for Trump is through the roof even higher –

WALLACE: I have mentioned it.

TRUMP: – even higher than last time. The enthusiasm for Biden is nonexistent. Everyone knows he's shot.

WALLACE: But the enthusiasm against you is high.

TRUMP: Well that's OK. That's his only shot.

WALLACE: Right.

TRUMP: And that's his only shot. I agree. And those people know I'm doing a good job, but there's something in my personality that they don't like because look, nobody's done what I've done.

Biden wants to come in and ruin our country, triple your taxes. He wants to do things – he wants to add regulations that I've all cut. And we still have regulation – a lot of regulation, but I've cut it down to a level that nobody's – nobody ever thought possible.

He will destroy this country, but it won't be him. It will be the radical left. The same type ideology that took over Venezuela, one of the richest countries in the world. They now have no water, they have no food, and they have no medicine.

WALLACE: Two--

TRUMP: That's going to happen here--

WALLACE: Two final questions--

TRUMP: If he wins--

WALLACE: In general, not talking about November, are you a good loser?

TRUMP: I'm not a good loser. I don't like to lose. I don't lose too often. I don't like to lose.

WALLACE: But are you gracious?

TRUMP: You don't know until you see. It depends. I think mail-in voting is going to rig the election. I really do.

WALLACE: Are you suggesting that you might not accept the results of the election?

TRUMP: No. I have to see. Look, Hillary Clinton asked me the same thing.

WALLACE: No, I asked you the same thing at the debate.

TAPE: Presidential Debate, October 19, 2016

WALLACE: There is a tradition in this country -- in fact, one of the prides of this country -- is the peaceful transition of power and that no matter how hard-fought a campaign is, that at the end of the campaign that the loser concedes to the winner. Not saying that you're necessarily going to be the loser or the winner, but that the loser concedes to the winner and that the country comes

together in part for the good of the country. Are you saying you're not prepared now to commit to that principle?

TRUMP: What I'm saying is that I will tell you at the time. I'll keep you in suspense. OK?

TRUMP: And you know what? She's the one that never accepted it.

WALLACE: I agree.

TRUMP: She never accepted her loss and she looks like a fool.

WALLACE: But can you give a, can you give a direct answer you will accept the election?

TRUMP: I have to see. Look, you – I have to see. No, I'm not going to just say yes. I'm not going to say no, and I didn't last time either.

WALLACE: Whether it's in 2021 or 2025, how will you regard your years as President of the United States?

TRUMP: I think I was very unfairly treated. From before I even won I was under investigation by a bunch of thieves, crooks. It was an illegal investigation.

WALLACE: But what about the good –

TRUMP: Russia, Russia, Russia.

WALLACE: But what about the good parts, sir?

TRUMP: No, no. I want to go this. I have done more than any president in history in the first three and a half years, and I've done it suffering through investigations where people have been – General Flynn, where people have been so unfairly treated.

The Russia hoax, it was all a hoax. The Mueller scam, it was all scam. It was all false. I made a bad decision on – one bad decision. Jeff Sessions, and now I feel good because he lost overwhelmingly in the great state of Alabama.

Here's the bottom line. I've been very unfairly treated, and I don't say that as paranoid. I've been very – everybody says it. It's going to be interesting to see what happens. But there was tremendous evidence right now as to how unfairly treated I was. President Obama and Biden spied on my campaign. It's never happened in history. If it were the other way around, the people would be in jail for 50 years right now.

That would be Comey, that would be Brennan, that would be all of this – the two lovers, Strzok and Page, they would be in jail now for many, many years. They would be in jail, it would've started two

years ago and they'd be there for 50 years. The fact is, they illegally spied on my campaign. Let's see what happens. Despite that, I did more than any president in history in the first three and a half years.

WALLACE: Mr. President, thank you, thanks for talking with us.

TRUMP: Thank you, thank you very much.



Conversation 2.3K Comments

What do you think?

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timbrown86 · 20 July, 2020



I think Trump's major problem is that he cannot evaluate anything, even himself, outside of the mass media he watches. The media criticizes him a lot, so he focuses mostly on their criticisms. Therefore when someone asks him "what will your presidency be remembered for", all he can think of is his fights with the media. It's as if that's all that's really mattered to him this whole time. His whole life, actually.

Everything we were warned about in 2008 with Obama, about him being a "celebrity", came true with Trump. *(Edited)*

Reply 👍 44 🗨️ 2

IminKona · 19 July, 2020



"TRUMP: Chris, that's because we have great testing, because we have the best testing in the world. If we didn't test, you wouldn't be able to show that chart. If we tested half as

much, those numbers would be down."

Hmm, of course. It would be half the number of tested cases. At the same time, if we doubled the number of tests, we'd have double the number of cases as well. And if we don't test at all, there would be no epidemic here. But he would have a difficult time explaining the 140,000 dead Americans due to unknown causes.

Reply  18 

 1 reply

blueAbbot · 20 July, 2020 

With most people, the purpose of words coming out of your mouth is to convey information. With Trump, it's to cause a reaction or create a belief, and whether that belief is true or false is totally beside the point if it gets him what he wants. Buried in this craziness is the statement "We're signing a health care plan within two weeks, a full and complete health care plan." He said this because Wallace questioned the wisdom of killing Obamacare during the pandemic, and so Trump responded in a way that he thought a person with an actual plan would react--the fact that there is no such plan is irrelevant. Just to be clear--any type of plan of the sort that he just made up would have to start as a bill in Congress, and no such bill is being worked on or discussed. It's also worth noting that Trump has made claims about having a great plan to replace Obamacare since before he took office, and no such plan has ever appeared. *(Edited)*

Reply  31 

This comment violated our policy.

blueAbbot · 20 July, 2020 

I predict nothing at all will happen in two weeks, as always. This kind of a massive program doesn't just come from a President making an executive order to "do healthcare like no one's ever seen". This is a massive undertaking that would definitely require legislation (including signoff from the Democratically-controlled House), and they know nothing about it (or are suddenly secretly collaborating with Trump to keep silent, I guess).

Reply  6 

JANUARY6THWASTRUMPSFAULT · 20 July, 2020 

Replying to blueAbbot

This would take work and brains. Trumps is lazy and ignorant.

Reply  20 

w Wonderer101 · 20 July, 2020 

Interesting interview.

It appears the president of the US is very proud of being able to identify an elephant.


That based on Johns Hopkins reporting the US has the 3rd highest reported death rate per 100K people (we are in the middle of the pack with case fatalities , 10 countries better, about 10 worse)

That while Trump claims we are leading the world in Corona virus, its in the wrong direction. The US, India and Columbia are the only countries shown by Johns Hopkins as not flattening the curve (US and India in class by themselves). Is this what Trump means by American exceptionalism?

...See more

Reply  25  1

 1 reply

LeeTinsley24 · 19 July, 2020 

Trump: "And all I can say is thank God I built most of the wall, because if I didn't have the wall up we would have a much bigger problem with Mexico."

Wikipedia: "On December 17, 2019, acting Commissioner of U.S. Customs and Border Protection Mark Morgan stated that 93 miles of barriers has been built during the Trump administration; according to CBP figures, at least 90 miles of that replaced existing structures."

Reply  33 

w WhatisWrongwithYouPeople? · 19 July, 2020 

He's delusional if he thinks the rest of the world envies the USA. Without exception, friends and family from other countries have expressed only horror, shock, and disbelief at this president, and how he's handling everything, not just the pandemic. Anyone who thinks otherwise is sorely mistaken.

Reply  24 

κ kayleight · 19 July, 2020 

Replying to WhatisWrongwithYouPeople?

He is not delusional; he has witnessed foreign leaders laughing at him. He thinks that if he says it, voters will believe him; and many will.

Reply  10 

o ohioconservative2020 · 19 July, 2020 

I watched the interview with my uncle, who is a pretty big Trump supporter, and even he was surprised at Trump's answers. He kept saying "what does that have to do with anything."

Reply  18  1

T Tortuga6 · 19 July, 2020 

When Obama left office, unemployment was 4.7% and economic growth was 1.9%

Chris Wallace pointed out: "The nonpartisan Congressional Budget Office says the unemployment rate at the end of the year will be 10.5 percent. JPMorgan says in the fourth quarter GDP will contract by 6.2 percent."

Trump said : "I think the economy is doing very well."

Reply  9 

F **ForTheObservations** · 19 July, 2020 

Replying to Tortuga6

That is the Honer Simpson brain answer for you. Always drifting in his own world thinking it is donut raining outside.

Reply  6 

P **PurpleBottleOpener** · 19 July, 2020 

"We're signing a health care plan within two weeks, a full and complete health care plan that the Supreme Court decision on DACA gave me the right to do. So we're going to solve -- we're going to sign an immigration plan, a health care plan, and various other plans. And nobody will have done what I'm doing in the next four weeks. The Supreme Court gave the president of the United States powers that nobody thought the president had, by approving, by doing what they did -- their decision on DACA. And DACA's going to be taken care of also."

Does anyone know what the above nonsense means? Does he think he can enact laws and appropriate funds without the Congress? Or is this just even more outrageous free associating Trump diarrhea?

Reply  23 

 1 reply




L **LibertyTree** · 20 July, 2020 

Not bothering to hide his indifference and contempt for science, the President made clear on Sunday that it's more important to him to be ultimately proven right about the pandemic than to reconsider his disastrous approach that is doing little to stop its deadly spread.

Until then, America must endure crammed ICUs in virus-ravaged states, thousands more deaths and the prospect of cities slumping back into economically crippling lockdowns that crush hopes of a return to work and school with normal life as only a memory.

Trump's passive leadership becomes more neglectful the worse the crisis gets -- with more than 140,000 Americans now dead.

"I'll be right eventually. I will be right eventually. You know I said, 'It's going to disappear.' I'll say it again," Trump said

Reply  31  3
 2 replies

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- Natural Science
- Dinosaurs

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- Cars + Trucks
- Travel + Outdoors
- House + Home
- Fitness + Well-being
- Style + Beauty
- Family
- Faith

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- Video Games
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<p>DISTRICT COURT, DENVER COUNTY, COLORADO 1437 Bannock Street Denver, CO 80202</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>ERIC COOMER, Ph.D., Plaintiff</p> <p>vs.</p> <p>DONALD J. TRUMP FOR PRESIDENT, INC., et al., Defendants</p>	
<p>Attorneys for Plaintiff Charles J. Cain, No. 51020 ccain@cstrial.com Steve Skarnulis, No. 21PHV6401 skarnulis@cstrial.com Bradley A. Kloewer, No. 50565 bkloewer@cstrial.com Zachary H. Bowman, No. 21PHV6676 zbowman@cstrial.com CAIN & SKARNULIS PLLC P. O. Box 1064 Salida, Colorado 81201 719-530-3011/512-477-5011 (Fax)</p> <p>Thomas M. Rogers III, No. 28809 trey@rklawpc.com Mark Grueskin, No. 14621 mark@rklawpc.com Andrew E. Ho, No. 40381 andrew@rklawpc.com RechtKornfeld PC 1600 Stout Street, Suite 1400 Denver, Colorado 80202 303-573-1900/303-446-9400 (Fax)</p>	<p>Case Number: 2020cv034319</p> <p>Division Courtroom: 409</p>
<p>EXHIBIT 63</p>	

Link to Video:

EXHIBIT 63

Video File

PRESERVED IN NATIVE FORMAT



Donald J. Trump 

@realDonaldTrump



We are up BIG, but they are trying to STEAL the Election. We will never let them do it. Votes cannot be cast after the Polls are closed!

12:49 AM · Nov 4, 2020 · Twitter for iPhone

**Exhibit
PX 0064**

EXHIBIT 65

Video File

PRESERVED IN NATIVE FORMAT



Donald J. Trump 
@realDonaldTrump



"REPORT: DOMINION DELETED 2.7 MILLION TRUMP VOTES NATIONWIDE. DATA ANALYSIS FINDS 221,000 PENNSYLVANIA VOTES SWITCHED FROM PRESIDENT TRUMP TO BIDEN. 941,000 TRUMP VOTES DELETED. STATES USING DOMINION VOTING SYSTEMS SWITCHED 435,000 VOTES FROM TRUMP TO BIDEN."

[@ChanelRion](#) [@OANN](#)



This claim about election fraud is disputed

11:34 AM · Nov 12, 2020 · Twitter for iPhone



46K Retweets 13.4K Quote Tweets 128.2K Likes



JOINT STATEMENT FROM ELECTIONS INFRASTRUCTURE GOVERNMENT COORDINATING COUNCIL & THE ELECTION INFRASTRUCTURE SECTOR COORDINATING EXECUTIVE COMMITTEES

Original release date: November 12, 2020

WASHINGTON – The members of Election Infrastructure Government Coordinating Council (GCC) Executive Committee – Cybersecurity and Infrastructure Security Agency (CISA) Assistant Director Bob Kolasky, U.S. Election Assistance Commission Chair Benjamin Hovland, National Association of Secretaries of State (NASS) President Maggie Toulouse Oliver, National Association of State Election Directors (NASED) President Lori Augino, and Escambia County (Florida) Supervisor of Elections David Stafford – and the members of the Election Infrastructure Sector Coordinating Council (SCC) – Chair Brian Hancock (Unisyn Voting Solutions), Vice Chair Sam Derheimer (Hart InterCivic), Chris Wlaschin (Election Systems & Software), Ericka Haas (Electronic Registration Information Center), and Maria Bianchi (Democracy Works) - released the following statement:

“The November 3rd election was the most secure in American history. Right now, across the country, election officials are reviewing and double checking the entire election process prior to finalizing the result.

“When states have close elections, many will recount ballots. All of the states with close results in the 2020 presidential race have paper records of each vote, allowing the ability to go back and count each ballot if necessary. This is an added benefit for security and resilience. This process allows for the identification and correction of any mistakes or errors. **There is no evidence that any voting system deleted or lost votes, changed votes, or was in any way compromised.**

“Other security measures like pre-election testing, state certification of voting equipment, and the U.S. Election Assistance Commission’s (EAC) certification of voting equipment help to build additional confidence in the voting systems used in 2020.

“While we know there are many unfounded claims and opportunities for misinformation about the process of our elections, we can assure you we have the utmost confidence in the security and integrity of our elections, and you should too. When you have questions, turn to election officials for more information.”

trusted voices as they administer elections.”

TLP:WHITE

###

Topics: Election Security

Keywords: CISA, Election security

Last Published Date: November 12, 2020

TLP:WHITE

Message

From: Dean Cleary [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9A11C8F29A2443DAB67E187FF27C68C0-DCLEARY]
Sent: 11/14/2020 3:38:13 AM
To: Zach Parkinson [zparkinson@donaldtrump.com]; Matt VanHyfte [mvanhyfte@donaldtrump.com]; Jacki Kotkiewicz [jkotkiewicz@donaldtrump.com]
Subject: RE: Project
Attachments: Dominion, Smartmatic, Sequoia And Venezuela.docx

SERVED ONLY: July 23, 2021 5:26 PM
FILING ID: 6EBDF31F970BA
CASE NUMBER: 2020CV34319

Attached here.

Not polished but I think we answered all of the questions.

The common theme here is that Dominion and Smartmatic were only in a partnership for three years nearly a decade ago but there has been some common connections with 3rd party groups, although not at the same time.

The election technology industry seems to be constantly buying and selling the same smaller firms back and forth and continuously rebranding themselves.

From: Zach Parkinson <zparkinson@donaldtrump.com>
Sent: Friday, November 13, 2020 9:53 PM
To: Dean Cleary <dcleary@donaldtrump.com>; Matt VanHyfte <mvanhyfte@donaldtrump.com>; Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>
Subject: RE: Project

Let's cut this off at 10:30. Have more dead voters we'll need to get to in the morning.

From: Dean Cleary <dcleary@donaldtrump.com>
Sent: Friday, November 13, 2020 9:38 PM
To: Zach Parkinson <zparkinson@donaldtrump.com>; Matt VanHyfte <mvanhyfte@donaldtrump.com>; Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>
Subject: RE: Project

We are making great progress, we got an 11 page doc right now. It is very slow and tedious learning and tracing down the claims and leads. I don't have an end prediction but we got maybe three-quarters of what you asked on paper.

From: Zach Parkinson <zparkinson@donaldtrump.com>
Sent: Friday, November 13, 2020 9:36 PM
To: Matt VanHyfte <mvanhyfte@donaldtrump.com>; Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>; Dean Cleary <dcleary@donaldtrump.com>
Subject: RE: Project

How are we looking?

From: Zach Parkinson
Sent: Friday, November 13, 2020 6:06 PM
To: Matt VanHyfte <mvanhyfte@donaldtrump.com>; Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>; Dean Cleary <dcleary@donaldtrump.com>
Subject: RE: Project

**Exhibit
PX 0068**

We need to look at these questions. Obviously, this is some conspiratorial stuff, but we need to be thorough and track it down. The two attached jpgs have the background on this “theory”.

Want the same format and type of product as last night. Attached is the final version of that for reference.

- Smartmatic
 - What is the relationship between Smartmatic and Dominion?
 - Do Dominion machines or software use software from Smartmatic?
 - Smartmatic is supposedly Spanish-owned. If so, are the votes somehow sent “overseas” to Spain when they are counted or tabulated?
 - Is Dominion somehow owned by Smartmatic through a company named Indra?
 - What is Smartmatic’s relationship to Venezuela and the Venezuelan government?
- Poulos
 - Is there some type of evidence that Poulos has “contributed” to antifa?

From: Matt VanHyfte <mvanhyfte@donaldtrump.com>

Sent: Friday, November 13, 2020 5:15 PM

To: Zach Parkinson <zparkinson@donaldtrump.com>; Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>; Dean Cleary <dcleary@donaldtrump.com>

Subject: Re: Project

Just a heads up for all, I’m picking up my dog currently. But should not take long. I’ll hop on ASAP.

From: Zach Parkinson <zparkinson@donaldtrump.com>

Sent: Friday, November 13, 2020 5:13:43 PM

To: Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>; Dean Cleary <dcleary@donaldtrump.com>; Matt VanHyfte <mvanhyfte@donaldtrump.com>

Subject: Project

About to send y’all a Dominion-related project we need to look at, so don’t head to the bar. I’ll send specific things we need to look into and substantiate or debunk.

Dominion, Smartmatic, Sequoia And Venezuela

TOPLINES

Dominion And Smartmatic Are Independent Companies That Split From Each Other In 2012,

- Both Dominion and Smartmatic are companies that provide election systems consulting
- Dominion entered into a partnership with Smartmatic in 2009
 - Dominion provided Smartmatic with voter machines used in the 2010 and 2013 Philippine elections
 - There were highly publicized glitches in the machines that caused reputational harm on Dominion.
- Dominion and Smartmatic terminated their partnership in 2012 after Smartmatic began doing business in Puerto Rico which Dominion interpreted as a violation of a noncompetition agreement in the United States
 - There is no evidence Dominion used Smartmatic technology in their machines in the 2020 election

There Is No Apparent Relationship Between Smartmatic And The Spanish Company Indra,

- Smartmatic claims that it has no relationship with Indra
- Smartmatic and Indra are rivals in the Philippines
- There is no evidence that votes were being counted overseas in Spain
 - The co-founder and CEO of Smartmatic is a Spanish-Venezuelan Citizen who now lives in London.
 - Smartmatic is headquartered in London

Dominion Has Not Direct Ties To Venezuela

- While Dominion has no company ties to Venezuela, Smartmatic does through its owners
- Smartmatic was investigated by the Committee on Foreign Investment in the United States due to its ties to Venezuela
- In 2004, Smartmatic was chosen by Venezuelan authorities to be used in a contentious referendum that confirmed Chavez as President
 - This election is believed to have been tampered with, as the algorithm appeared to adjust the vote in Chavez favor
- Before this election, the Venezuelan government invested in a smaller company tied to Smartmatic through its owners
 - In return for the investment, the Venezuelan government agency was given a 28 percent stake and a seat on its board
 - The Venezuelan government placed a senior official of the Science Ministry and advisor to Chavez on elections technology, Omar Montilla, on the board

- Venezuelan officials insist the money invested was repaid, and that Venezuela never directly had a stake in Smartmatic

Sequoia Was Owned By Smartmatic From 2005 to 2007 And Not Purchased By Dominion Until 2010

- Smartmatic owned Sequoia voting machines from 2005 to 2007
- While Smartmatic owned Sequoia, Sequoia machines caused irregularities in Chicago
- Dominion bought Sequoia in 2010, three years after Smartmatic sold the company

There Is No Evidence That Dominion’s CEO Or Any Other Leader Of The Group Has Ties To Antifa

- There is no evidence that Dominion CEO John Poulos has tied to Antifa
- There is an internet rumor that Dominion’s Director Of Product Safety, Dr. Eric Coomer, had ties to Antifa
 - Coomer allegedly posted (now deleted) some songs to his Facebook Page that were anti-police.
 - Coomer also wrote a facebook post (now deleted) in which he criticized President Trump for characterizing Antifa as an organization.
 - There is no evidence Coomer is a member or has any ties to Antifa

COMPANY PROFILE

Smartmatic Has A Global Presence

Smartmatic Was Established In Florida In The Wake Of The 2000 Election. “Established in Florida in the wake of the 2000 election, Smartmatic focused on building the most secure, accessible and easy-to-use election technologies ever designed, to safeguard the election process from start to finish.” (“About Smartmatic,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)

- **In 2005, Smartmatic First Launched Its Technology In The United States.** (“Our History,” [HYPERLINK "https://www.smartmatic.com/us/about/our-history/"], Accessed 11/13/20)

Smartmatic Has Designed And Implemented Secure Voting Technologies For Election Commissions On 5 Continents In 25 Countries. “Today, Smartmatic is the world leader in election technology. From Chicago to Manila. From Utah to Belgium. And from Los Angeles to London – since 2003 Smartmatic has successfully designed and implemented secure voting technologies for election commissions on five continents in 25 countries. We’ve recorded and tabulated more than 5 billion votes with zero security breaches.” (“About Smartmatic,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)

Smartmatic Invests “Substantial Resources” Into Research And Development In Its Three Centers: The Americas, Europe, And Asia. “Committed to innovation, Smartmatic invests substantial resources in its three R&D centers in the Americas, Europe and Asia.” (“About Smartmatic,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)

Company Leadership

Smartmatic Board Of Directors:

- **Roger Piñate, Director – Smartmatic Global Board** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)
- **Peter Neffenger, Chairman – Smartmatic USA Board** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)
- **Gracia Hillman, Director – Smartmatic USA Board** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)
- **David Melville, Director And Chief Counsel – Smartmatic Global Board** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)
- **Robert Cook, Executive Director – Smartmatic USA Board** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)
- **Paul DeGregorio, Director – Smartmatic USA Board** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)

Global Management Team:

- **Antonio Mugica, Chief Executive Officer** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)
- **Roger Piñate, President** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)
- **Pedro Mugica, President – Global Sales** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)

U.S. Leadership Team:

- **Denis Bechac, Business Development** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)
- **Samira Saba, Director – Communications** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)
- **Liliana Armas, General Counsel – Americas** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)
- **Edwin Smith, Director – Certification** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)
- **Shari Little, Product Management Director** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)
- **Jeff Scott, Business Product Manager** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)

Los Angeles – VSAP Project – Management Team:

- **James Long, VSAP Project Director** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)
- **Dan Murphy, VSAP Engagement Director** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)

- **Angie McWhorter, VSAP Project Manager** (“Our Team,” [[HYPERLINK "https://www.smartmatic.com/us/about/leadership/"](https://www.smartmatic.com/us/about/leadership/)], Accessed 11/13/20)

Smartmatic Is Privately Owned

Smartmatic Is Privately Owned By SGO, Employees, And Angel Investors. “Two of the founders, Antonio Mugica and Roger Piñate, continue to run the company as CEO and President, respectively. The majority of shares (83%) are held by SGO, a company owned by the Mugica and Piñate families. The remaining shares are held by employees (10%) and angel investors (7%).” (“Smartmatic Fact-Checked,” [[HYPERLINK "https://www.smartmatic.com/us/smartmatic-fact-checked/"](https://www.smartmatic.com/us/smartmatic-fact-checked/)], Accessed 11/13/20)

Smartmatic Does Not Own Any Other Voting Machine Company Currently. “Does Smartmatic own any other voting machine company? No.” (“Smartmatic Fact-Checked,” [[HYPERLINK "https://www.smartmatic.com/us/smartmatic-fact-checked/"](https://www.smartmatic.com/us/smartmatic-fact-checked/)], Accessed 11/13/20)

Smartmatic’s Software Is Not Licensed For Use In Other Company’s Voting Machines. “Is Smartmatic’s software used in other company’s voting machines? No. Smartmatic’s software is not licensed or otherwise used by other companies.” (“Smartmatic Fact-Checked,” [[HYPERLINK "https://www.smartmatic.com/us/smartmatic-fact-checked/"](https://www.smartmatic.com/us/smartmatic-fact-checked/)], Accessed 11/13/20)

Smartmatic Has Transparency Problems

Smartmatic Is Not Transparent, As The Company Has Been “Restructured Into An Elaborate Web Of Offshore Companies And Foreign Trusts.” “But the role of the young Venezuelan engineers who founded Smartmatic has become less visible in public documents as the company has been restructured into an elaborate web of offshore companies and foreign trusts.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

Smartmatic Was Reorganized In An Array Of Holding Companies Based In Delaware, The Netherlands, And Curaçao, With The Firm’s Ownership Further Shielded In Two Curaçao Trusts. “More recent corporate documents show that before and after Smartmatic’s purchase of Sequoia from a British-owned firm, the company was reorganized in an array of holding companies based in Delaware (Smartmatic International), the Netherlands (Smartmatic International Holding, B.V.), and Curaçao (Smartmatic International Group, N.V.). The firm’s ownership was further shielded in two Curaçao trusts.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

- **Smartmatic Claims The Reorganization Was Done To Expand The Company’s International Operations, Not To Hide Its Ownership.** “Mr. Stoller, the Smartmatic spokesman, said that the reorganization was done simply to help expand the company’s international operations, and that it had not tried to hide its ownership, which he said was more than 75 percent in the hands of Mr. Mugica and his family.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

POLITICAL TIES & DONATIONS

Smartmatic Employees Have Made Nearly Than \$12,000 In Political Donations, But These Have Predominantly Gone To Democrats

Smartmatic Employees Have Donated A Total Of \$256.86 To Political Candidates Or Committees. ([[HYPERLINK "https://www.fec.gov/data/receipts/individual-contributions/?contributor_employer=smartmatic"](https://www.fec.gov/data/receipts/individual-contributions/?contributor_employer=smartmatic)], Accessed 11/13/20)

Of That Amount, \$166.86 – Or 85 Percent – Went To Democratic Candidates Or Committees. ([HYPERLINK "https://www.fec.gov/data/receipts/individual-contributions/?contributor_employer=smartmatic"], Accessed 11/13/20)

- **Two Employees Donated A Total Of \$90.00 To President Trump.** ([HYPERLINK "https://www.fec.gov/data/receipts/individual-contributions/?contributor_employer=smartmatic"], Accessed 11/13/20)

Smartmatic General Counsel, Liliana Parnas, Has Donated \$11,515.86 To ActBlue, Earmarked For People Powered Action. ([HYPERLINK "https://www.fec.gov/data/receipts/?data_type=processed&contributor_name=Liliana+Armas&two_year_transaction_period=2020&min_date=01%2F01%2F2019&max_date=12%2F31%2F2020&contributor_state=FL"], Accessed, 11/13/20)

Note: Smartmatic Employees Are Prohibited From Making Political Donations. ("Smartmatic Fact-Checked," [HYPERLINK "https://www.smartmatic.com/us/smartmatic-fact-checked/"], Accessed 11/13/20)

DOMINION VOTING SYSTEMS AND SMARTMATIC'S SHORT-LIVED PARTNERSHIP

Dominion Voting Systems And Smartmatic Are Independent Companies That Offer Election Management Systems

Dominion Voting Systems Corporation Is A Company That Provides Election Planning And Voting Systems Such As Voter List Management, Voter List Strike-Off And Poll Tabulation. "Dominion Voting Systems Corporation provides election planning processes and voting system services. The Company offers voter list management, voter list strike-off, and poll tabulation." ("Dominion Voting Systems Corp," [HYPERLINK "https://www.bloomberg.com/profile/company/3614901Z:CN"], Accessed 11/13/20)

- **Dominion Voting Systems, Inc. Is Registered In Colorado And Has An Office In Denver.** (Colorado Business Entity Search, [HYPERLINK "https://www.sos.state.co.us/biz/BusinessEntityDetail.do?quitButtonDestination=BusinessEntityResults&nameTyp=ENT&masterFileId=20101359683&entityId2=20101359683&fileId=20101359683&srchTyp=ENTITY"], Accessed 11/12/20; Dominion Voting Systems, Periodic Report, [HYPERLINK "https://www.sos.state.co.us/biz/ViewImage.do?masterFileId=20101359683&fileId=20201336566"], Filed 4/15/20; [HYPERLINK "https://www.dominionvoting.com/about/"], Accessed 11/12/20)

Smartmatic Corporation Is An Electoral Project Management And Consulting Company. "Smartmatic Corporation provides automated election systems. The Company offers electoral project management and consulting, voter education and information campaigns, consulting of electoral processes and documentation, including legal consulting. Smartmatic serves customers worldwide." ("Smartmatic Corp," [HYPERLINK "https://www.bloomberg.com/profile/company/576460Z:US"] \l":~:text=Smartmatic%20Corporation%20provides%20automated%20election,Smartmatic%20serves%20customers%20worldwide."], Accessed 11/13/20)

Dominion Voting Systems Does Not Own Smartmatic

Dominion Voting Systems Does Not Own Smartmatic. "Neither Smartmatic or Mr. Soros has any ownership interest whatsoever in Dominion, and they have had no ownership interest in the past. Dominion has no relationship whatsoever with Mr. Soros, his companies or his foundations." ("Dominion Voting Systems Ownership: Fact Check," [HYPERLINK "https://www.co.hunterdon.nj.us/pdf/ElectionBd/2016-HunterdonCountyVotingMachineFactCheck.pdf"], 10/25/16)

Snopes: Dominion Has No Company Ownership Relationships With Smartmatic. “Dominion has no company ownership relationships with any member of the Pelosi family, the Feinstein family, or the Clinton Global Initiative, Smartmatic, or any ties to Venezuela. Dominion works with all political parties; our customer base and our government outreach practices reflect this nonpartisan approach.” (Dan Evon “Rumor Alert: Dominion Voting Systems Fraud Claims,” [[HYPERLINK "https://www.snopes.com/fact-check/rumor-alert-dominion-voting-systems-fraud-claims/"](https://www.snopes.com/fact-check/rumor-alert-dominion-voting-systems-fraud-claims/)], 11/8/20)

In 2009, Dominion Entered Into A Contract Providing Optical Scanners To Smartmatic

In 2009, Dominion Entered Into A Contract With Smartmatic In Which They Provided Smartmatic Optical Scanners To Be Used In The 2010 Philippine Election. “Dominion entered into a 2009 contract with Smartmatic and provided Smartmatic with the PCOS machines (optical scanners) that were used in the 2010 Philippine election, the biggest automated election run by a private company. The automation of that first election in the Philippines was hailed by the international community and by the critics of the automation. The results transmission reached 90% of votes four hours after polls closed and Filipinos knew for the first time who would be their new president on Election Day. In keeping with local Election law requirements, Smartmatic and Dominion were required to provide the source code of the voting machines prior to elections so that it could be independently verified.” (“Voting Technology Companies in the U.S. - Their Histories and Present Contributions,” [[HYPERLINK "https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions"](https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions)], 8/10/17)

Smartmatic’s Reputation Suffered After Glitches In The Philippine Elections

Dominion And Smartmatic’s Reputations Suffered After A Series Of High Profile Glitches In The 2010 And 2013 Philippine Elections. “Both companies’ reputations suffered as a result of heavily publicized litigation relating to a software glitch that was resolved just before the 2010 election and that litigation rumbled on to partly affect the mid-term elections in 2013. However, for the 2016 elections in the Philippines, Smartmatic operated with their own technology having released a new vote counting machine which replaced the previous version, resulting in ‘the speediest canvassing proceedings in the country’s history.” (“Voting Technology Companies in the U.S. - Their Histories and Present Contributions,” [[HYPERLINK "https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions"](https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions)], 8/10/17)

Litigation Over Smartmatic “Glitches” Has Alleged An Impact On The 2010 And 2013 Mid-Term Elections In The Philippines. “Litigation over Smartmatic ‘glitches’ alleges they impacted the 2010 and 2013 mid-term elections in the Philippines, raising questions of cheating and fraud. An independent review of the source codes used in the machines found multiple problems, which concluded, ‘The software inventory provided by Smartmatic is inadequate, ... which brings into question the software credibility,’ ABS-CBN reported.” (Bethany Blankley, “Officials Raised Concerns For Years About Security Of US Voting Machines, Software Systems,” [[HYPERLINK "https://www.washingtonexaminer.com/politics/officials-raised-concerns-for-years-about-security-of-us-voting-machines-software-systems"](https://www.washingtonexaminer.com/politics/officials-raised-concerns-for-years-about-security-of-us-voting-machines-software-systems)], 11/9/20)

Note: Smartmatic’s Chairman Is Loosely Affiliated With George Soros

Smartmatic’s Chairman, Mark Malloch Brown, Is A Member Of The British House Of Lords And Was A Former Vice-Chairman Of George Soros’ Investment Funds. “Smartmatic’s chairman is a member of the British House of Lords, Mark Malloch Brown, a former vice-chairman of George Soros’ Investment Funds, former vice-president at the World Bank, lead international partner at Sawyer Miller, a political consulting firm, and former vice-chair of the World Economic Forum who “remains deeply involved in international affairs.” The company’s reported globalist ties have caused members of the media and government officials to raise questions about its involvement in the U.S. electoral process.”

(Bethany Blankley, “Officials Raised Concerns For Years About Security Of US Voting Machines, Software Systems,” [[HYPERLINK](https://www.washingtonexaminer.com/politics/officials-raised-concerns-for-years-about-security-of-us-voting-machines-software-systems)

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"<https://www.washingtonexaminer.com/politics/officials-raised-concerns-for-years-about-security-of-us-voting-machines-software-systems>"], 11/9/20)

Dominion And Smartmatic Terminated Their Contract In 2012 Over A Disagreement Regarding A Noncompetition Agreement In Puerto Rico

In 2012, Dominion Accused Smartmatic Of Breaching A Noncompetition Clause By Conducting Business In Puerto Rico – Smartmatic Claimed That Puerto Rico Was Not Part Of The United States And Therefore Was Not In Violation Of An Agreement Not To Compete In The United States. “In 2012, Smartmatic submitted a bid to sell the licensed voting systems to the government of Puerto Rico for its upcoming elections. Dominion also submitted a bid. Upon learning of Smartmatic’s bid, Dominion notified Smartmatic by letter that Smartmatic was in breach of the license agreement’s noncompetition provision, asserting that Puerto Rico is ‘in the United States.’ Dominion also purported to terminate the agreement as a result of the alleged breach. Smartmatic rejected Dominion’s termination as invalid, contending that Puerto Rico is not ‘in the United States.’ Following its purported termination of the license agreement, Dominion ceased performing its contractual obligations, leading Smartmatic to file suit in the Court of Chancery. In response, Dominion asserted counterclaims.” (“Smartmatic Int’l Corp. v. Dominion Voting Sys. Int’l Corp., C.A. No. 7844-VCP (Del. Ch. May 1, 2013) (Parsons, V.C.),” [[HYPERLINK "https://www.potteranderson.com/delawarecase-77.html"](https://www.potteranderson.com/delawarecase-77.html)] , 5/1/13)

There Is No Evidence That Dominion Used Smartmatic’s Software In The 2020 Election Cycle

The Partnership Between Dominion And Smartmatic Ended In 2012 “On Rocky Terms.” “As previously mentioned, Smartmatic and Dominion Voting have shared tumultuous interactions. Their 2009 partnership ended on rocky terms. The termination of their agreement in 2012 had the potential to deny Smartmatic access to vital material and information necessary to correct any issues with the PCOS voting devices, which created an understandable fear among the Filipino public since Smartmatic had been contracted to provide the PCOS systems for the May 2013 mid-term elections. However, for the mid-term 2013 elections, Smartmatic deployed 76,000 machines and only 258 of those had to be replaced, and in many cases, it was due to handling errors rather than machine failures.” (“Voting Technology Companies in the U.S. - Their Histories and Present Contributions,” [[HYPERLINK "https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions"](https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions)] , 8/10/17)

THERE IS NO APPARENT RELATIONSHIP BETWEEN SMARTMATIC AND INDRA

Smartmatic And Indra Do Not Appear To Have Ties

Smartmatic Claims To Not Have Any Ties To Indra Sistemas According To Its Website. “Does Smartmatic have any ties to Indra Sistemas? No.” (“Smartmatic Fact-Checked,” [[HYPERLINK "https://www.smartmatic.com/us/smartmatic-fact-checked/"](https://www.smartmatic.com/us/smartmatic-fact-checked/)] , Accessed 11/13/20)

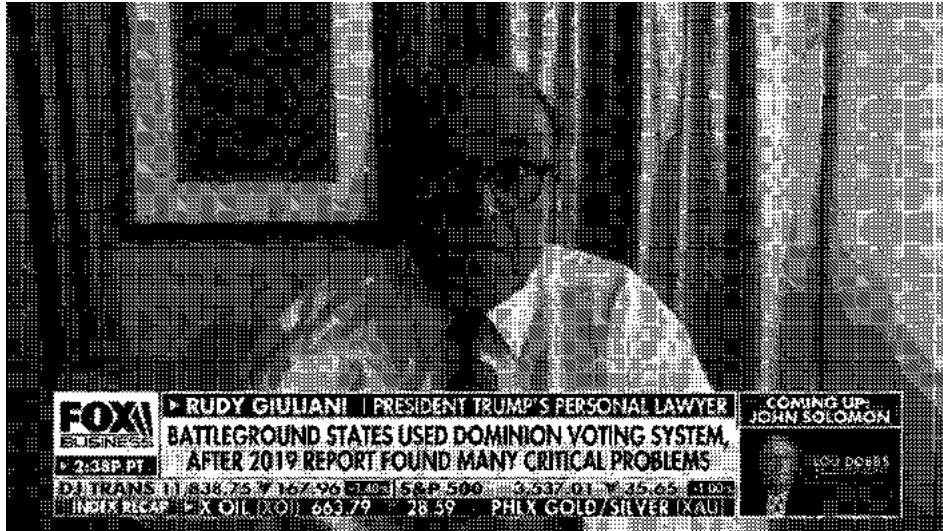
Smartmatic And Indra Are Rivals

Smartmatic And Indra Were Considered Rival Companies In The Philippines. “It looks like the war between two technology providers vying for a P2.5-billion contract at the Commission on Elections (Comelec) for the 2016 presidential polls has begun. Smartmatic-TIM Corp., which provided the technology during the last two elections in the country, has questioned the eligibility of rival Indra Sistemas S.A. to participate in the public bidding for the lease of 23,000 optical mark reader (OMR) machines for the forthcoming balloting. In a statement, Smartmatic-TIM lead counsel Ruby Yusi said the approval of Indra’s eligibility in the first stage of the bidding process was questionable since the Spanish company failed to properly designate a local representative for the bidding.” (“It’s War Between 2 Tech Firms For

Comelec Contract," [HYPERLINK "https://business.inquirer.net/184165/its-war-between-2-tech-firms-for-comelec-contract"], 12/29/14)

Rudy Giuliani Claimed That Smartmatic Sent Its Votes Overseas To Barcelona To Be Counted

On November 12, Rudy Giuliani Claimed On Fox Business That Votes From The Dominion Machines Sent The Votes To Be Counted In Barcelona, Spain. RUDY GIULIANI: "Dominion is a Canadian company but all of its software is Smartmatic Software. The votes actually go to Barcelona, Spain." (Fox Business' "Lou Dobbs Tonight," 11/12/20)



[HYPERLINK
"https://www.youtube.com/watch?v=evpejvWAh9w&feature=youtu.be&t=156&ab_channel=FrontPageIndex"]

However, The Only Apparent Evidence That Votes Were Being Counted In Spain Was That Smartmatic Is Owned By A Spanish Person

Antonio Mugica Is The CEO And Co-Founder Of Smartmatic Corp. ("Antonio Mugica," [HYPERLINK "https://www.bloomberg.com/profile/person/15135990"], Accessed 11/13/20)

Mugica Is A Spanish-Venezuelan Dual National. "The firm said it is owned primarily by three entrepreneurs: Antonio Mugica, a dual-Spanish-Venezuelan national." ("Voting Machine Company Vows No Connection to Venezuelan President Chavez," [HYPERLINK "https://www.govtech.com/security/Voting-Machine-Company-Vows-No-Connection.html"], 1/1/06)

Mugica Lives In London, United Kingdom. (Antonio Mugica, [HYPERLINK "https://www.linkedin.com/in/antoniomugica/?originalSubdomain=uk"], Accessed 11/13/20)

Smartmatic Is Headquartered In London, United Kingdom. ("Get in touch with us," [HYPERLINK "https://www.smartmatic.com/us/contact/"], Accessed 11/13/20)

VENEZUELA

Dominion Has No Company Ties To Venezuela

Snopes: Dominion Has No Company Ties To Venezuela. "Dominion has no company ownership relationships with any member of the Pelosi family, the Feinstein family, or the Clinton Global Initiative, Smartmatic, or any ties to Venezuela. Dominion works with all political parties; our customer base and

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our government outreach practices reflect this nonpartisan approach.” (Dan Evon “Rumor Alert: Dominion Voting Systems Fraud Claims,” [[HYPERLINK "https://www.snopes.com/fact-check/rumor-alert-dominion-voting-systems-fraud-claims/"](https://www.snopes.com/fact-check/rumor-alert-dominion-voting-systems-fraud-claims/)], 11/8/20)

Smartmatic’s Ties To Venezuela

Smartmatic’s Business Address Was Originally Registered To The Father Of One Of The Two Young Venezuelan Engineers Who Were Its Principal Officers, Antonio Mugica And Alfredo Anzola.

“Smartmatic was then a fledgling technology start-up. Its registered address was the Boca Raton, Fla., home of the father of one of the two young Venezuelan engineers who were its principal officers, Antonio Mugica and Alfredo Anzola, and it had a one-room office with a single secretary.” (Tim Golden, “U.S. Investigates

Voting Machines’ Venezuela Ties,” [[HYPERLINK](https://www.nytimes.com/2006/10/29/washington/29ballot.html)

"https://www.nytimes.com/2006/10/29/washington/29ballot.html"], 10/29/06)

The Concerns About Possible Ties Between The Owners Of Smartmatic And The Chávez Government Have Been Well Known To U.S. Foreign Policy Officials Since 2004.

“The concerns about possible ties between the owners of Smartmatic and the Chávez government have been well known to United States foreign-policy officials since before the 2004 recall election in which Mr. Chávez, a strong ally of President Fidel Castro of Cuba, won by an official margin of nearly 20 percent.” (Tim Golden, “U.S.

Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK](https://www.nytimes.com/2006/10/29/washington/29ballot.html)

"https://www.nytimes.com/2006/10/29/washington/29ballot.html"], 10/29/06)

In 2006, The Committee On Foreign Investment In The United States Opened An Investigation Into Smartmatic.

“The federal government is investigating the takeover last year of a leading American manufacturer of electronic voting systems by a small software company that has been linked to the leftist Venezuelan government of President Hugo Chávez. The inquiry is focusing on the Venezuelan owners of the software company, the Smartmatic Corporation, and is trying to determine whether the government in Caracas has any control or influence over the firm’s operations, government officials and others familiar with the investigation said. The inquiry on the eve of the midterm elections is being conducted by the Committee on Foreign Investment in the United States, or Cfius, the same panel of 12 government agencies that reviewed the abortive attempt by a company in Dubai to take over operations at six American ports earlier this year.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK](https://www.nytimes.com/2006/10/29/washington/29ballot.html)

"https://www.nytimes.com/2006/10/29/washington/29ballot.html"], 10/29/06)

The Venezuelan Government Invested Heavily In Smartmatic’s Owners

In 2004, Smartmatic Was Chosen By Venezuelan Authorities To Be Used In A Contentious Referendum That Confirmed Hugo Chávez As President.

“Smartmatic was a little-known firm with no experience in voting technology before it was chosen by the Venezuelan authorities to replace the country’s elections machinery ahead of a contentious referendum that confirmed Mr. Chávez as president in August 2004.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK](https://www.nytimes.com/2006/10/29/washington/29ballot.html)

"https://www.nytimes.com/2006/10/29/washington/29ballot.html"], 10/29/06)

- **This Election Involved “A Very Subtle Algorithm” That Appeared To Adjust The Vote In Chávez’s Favor.** “Turning to Venezuela, he said that Chavez controlled all of the country’s voting equipment before he won a 2004 nationwide recall vote that had threatened to end his rule. When Chavez won, Venezuelan mathematicians challenged results that showed him to be consistently strong in parts of the country where he had weak support. The mathematicians found ‘a very subtle algorithm’ that appeared to adjust the vote in Chavez’s favor, Stigall said.” (Greg Gordon, “Most Electronic Voting Isn’t Secure, CIA Expert Says,” [[HYPERLINK "https://www.mcclatchydc.com/news/politics-government/article24530650.html"](https://www.mcclatchydc.com/news/politics-government/article24530650.html)] , 3/24/09)

Months Before This Contract Was Awarded To Smartmatic, A Venezuelan Government Financing Agency Invested Over \$200,000 Into A Technology Company Owned By Some Of The Same People As Smartmatic, That Joined With Smartmatic As A Minor Partner In The Bid. “Seven months before that voting contract was awarded, a Venezuelan government financing agency invested more than \$200,000 into a smaller technology company, owned by some of the same people as Smartmatic, that joined with Smartmatic as a minor partner in the bid.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

- **This Smaller Company Was Called The Bizta Corporation.** “Opposition members of Venezuela’s electoral council had also protested that they were excluded from the bidding process in which Smartmatic and a smaller company, the Bizta Corporation, were selected to replace a \$120 million system that had been built by Election Systems and Software of Omaha.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

In Return, The Venezuelan Government Agency Was Given A 28 Percent Stake In The Smaller Company And A Seat On Its Board. “In return, the government agency was given a 28 percent stake in the smaller company and a seat on its board, which was occupied by a senior government official who had previously advised Mr. Chávez on elections technology. But Venezuelan officials later insisted that the money was merely a small-business loan and that it was repaid before the referendum.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

- **The Venezuelan Government Placed A Senior Official Of The Science Ministry, Omar Montilla, On Bizta’s Board.** “Weeks before Bizta and Smartmatic won the referendum contract, the government also placed a senior official of the Science Ministry, Omar Montilla, on Bizta’s board, alongside Mr. Mugica and Mr. Anzola.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)
- **Montilla Acted As An Adviser To Chávez On Elections Technology.** “Mr. Montilla, The Herald reported, had acted as an adviser to Mr. Chávez on elections technology.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

In 2006, A Smartmatic Spokesperson Denied That Venezuela Has Ever Held Any Stake In Smartmatic, But Acknowledged The Role The Venezuelan Government Played In The “Separate Company” Bizta. “‘No foreign government or entity, including Venezuela, has ever held any stake in Smartmatic,’ Mr. Stoller said. ‘Smartmatic has always been a privately held company, and despite that, we’ve been fully transparent about the ownership of the corporation.’ Mr. Stoller emphasized that Bizta was a separate company and said the shares the Venezuelan government received in it were ‘the guarantee for a loan.’” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

Venezuelan Officials Insisted The Money Invested In Bizta Was “Merely A Small-Business Loan And That It Was Repaid Before The Referendum.” “But Venezuelan officials later insisted that the money was merely a small-business loan and that it was repaid before the referendum.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

SMARTMATIC OWNED SEQUOIA BETWEEN 2005 AND 2007

In 2005, Smartmatic Bought Sequoia Voting Systems

In 2005, Smartmatic Bought Sequoia Voting Systems With A Windfall Of \$120 Million From Its Contracts With Venezuela. "With a windfall of some \$120 million from its first three contracts with Venezuela, Smartmatic then bought the much larger and more established Sequoia Voting Systems, which now has voting equipment installed in 17 states and the District of Columbia." (Tim Golden, "U.S. Investigates Voting Machines' Venezuela Ties," [HYPERLINK "<https://www.nytimes.com/2006/10/29/washington/29ballot.html>"], 10/29/06)

While Smartmatic Owned Sequoia, Sequoia Voting Machines Caused Irregularities In Chicago

In March 2006, A Series Of Delays And Irregularities In Chicago Were Blamed On Sequoia Voting Machines, Traceable To Smartmatic Workers And Software Issues From Venezuela. "But after a municipal primary election in Chicago in March, Sequoia voting machines were blamed for a series of delays and irregularities. Smartmatic's new president, Jack A. Blaine, acknowledged in a public hearing that Smartmatic workers had been flown up from Venezuela to help with the vote. Some problems with the election were later blamed on a software component, which transmits the voting results to a central computer, that was developed in Venezuela." (Tim Golden, "U.S. Investigates Voting Machines' Venezuela Ties," [HYPERLINK "<https://www.nytimes.com/2006/10/29/washington/29ballot.html>"], 10/29/06)

In 2007, Smartmatic Sold Sequoia Voting Machines

In 2007, Smartmatic Was Forced To Sell Sequoia Voting Systems. "On December 22, 2006, Smartmatic Corporation announced the company's intention to sell Sequoia Voting Systems. At that time, Smartmatic CEO Antonio Mugica stated, 'Sequoia's customer base has grown substantially and its revenues have increased four-fold. However, given the current climate of the United States marketplace with so much public debate over foreign ownership of firms in an area that is viewed as critical U.S. infrastructure - election technology - we feel it is in both companies' best interests to move forward as separate entities with separate ownership. As part of this process, we plan to sell our Sequoia Voting Systems ownership.' Sequoia Voting Systems worked for many months with Smartmatic to find an appropriate situation that would be a win-win for both companies. Given Sequoia's strong position in the US electoral market and significant opportunities therein, many buyers expressed interest in Sequoia. Smartmatic selected this team to purchase Sequoia as they believe in the ability of Sequoia's current management team to perform as successfully as they have in the past, which will allow Smartmatic to capitalize on the earn-out purchase plan." (Press Release, "U.S. Voting Technology Leader Sequoia Voting Systems Announces New Corporate Ownership," [HYPERLINK "<http://web.archive.org/web/20071226071517/http://www.sequoiavote.com/pressText.php?pressIn=41>"], 11/8/07)

- **Jack Blaine And Peter McManemy Led The Purchase Of Sequoia From Smartmatic, Making The Company U.S. Owned.** "The investment group, led by Sequoia President & CEO Jack Blaine and company Chief Financial Officer Peter McManemy, purchased Sequoia from former parent company Smartmatic Corporation for an undisclosed sum. As with most transactions involving two private entities, the specific terms of the sale are not being disclosed. However, this transaction does include investment by the management team, a small loan and an earn-out. This scenario provides an excellent financial structure for Sequoia to leverage and completely eliminates Smartmatic's ownership, control and operational rights of any kind in Sequoia." (Press Release, "U.S. Voting Technology Leader Sequoia Voting Systems Announces New Corporate Ownership," [HYPERLINK

"http://web.archive.org/web/20071226071517/http://www.sequoiavote.com/pressText.php?pre
ssIn=41"], 11/8/07)

In 2008, It Was Revealed Smartmatic's Intellectual Property Still Existed In Sequoia's Machines.

"In return, Smartmatic promises to grant to Hart a license to use its intellectual property currently found in Sequoia's machines." (Civil Action No. 3585-VCL, [HYPERLINK

"https://courts.delaware.gov/opinions/(q12dhpay5yxgbz55qzb5h0nb)/download.aspx?ID=105040"], 3/31/08)

Sequoia Was Acquired By Dominion In 2020

In 2010, Sequoia Was Acquired By Dominion Voting Systems. "After losing money for several years, on March 8, 2005, Sequoia was acquired by Smartmatic, a multi-national technology company which had developed advanced election systems, voting machines included. In November 2007, following a verdict by the CFIUS, Smartmatic was ordered to sell Sequoia, which it did to its Sequoia managers having U.S. citizenship. Sequoia Voting Systems was acquired by Denver-based Dominion Voting Systems on June 4, 2010." ("Manufacturer Profile," [HYPERLINK "https://verifiedvoting.org/election-system/sequoia-dominion-optech-insight/"], Accessed 11/13/20)

DOMINION'S LEADERSHIP HAS NO TIES TO ANTIFA

There Is No Evidence To The Claim That Dominion's Head Of Strategy And Security Has Ties To Antifa

Note: Similarly, there is no evidence that Dominion's CEO John Poulos has ties to antifa

There Is An Internet Rumor That A Top Level Employee At Dominion Has Ties To Antifa

Eric Coomer Is An Executive With Dominion Voting Systems. "Eric Coomer, an executive with Dominion Voting Systems, which sold the state its new election system last year for more than \$100 million, said the problem has to do with the way the voting machines communicate with the underlying Android operating system. He told Totenberg a minor software change will address the issue." (Kate Brumback, "Lawyers Spar Over Georgia Voting Machine Glitch, Planned fix," [HYPERLINK "https://apnews.com/article/election-2020-senate-elections-technology-georgia-elections-af357b7ab7145033f11ee34a1bbf4a3c"], 9/29/20)

- **Coomer Was The Director Of Product Strategy For Dominion.** ("Risk-Limiting Audit, Participation Group: Kickoff Conference: Colorado Secretary of State," [HYPERLINK "https://www.sos.state.co.us/pubs/elections/VotingSystems/riskAuditFiles/20170203RLAParticipantGroup.pdf" \l "page=7"], 2/3/17)

The Rumors Are Fueled Because Of Now-Deleted Anti-Police Facebook Posts

A Blogger Under The Pseudonym "Conservative Treehouse" Alleged That Dr. Eric Coomer, Who He Claimed Was The Head Of Strategy And Security For Dominion Voting Systems, Was A Supporter Of Antifa For Now-Deleted Facebook Posts In Which Coomer Allegedly Posted Anti-Police Songs.

"These are posts that Dr. Eric Coomer posted in May. He is the man that is responsible for the Strategy and Security of Dominion Voting Systems. Notice the anti-American sentiment. Eric Coomer is a major shareholder in Dominion Voting Systems, holder of election system patents and an Antifa supporter."

(Conservative Treehouse, [HYPERLINK

"https://www.facebook.com/ConservativeTreehouse/posts/3452364778132202"], 11/12/20)

Note: There are other similar posts directed at Dr. Eric Coomer

These are posts that Dr. Eric Coomer posted in May. He is the man that is responsible for the Strategy and Security of Dominion Voting Systems. Notice the anti-American sentiment. Eric Coomer is a major shareholder in Dominion Voting Systems, holder of election system patents and an Antifa supporter.



However, There Is No Evidence That Eric Coomer Is A Supporter Of Antifa In Any Way

In June, Eric Coomer Posted A Facebook Message In Which He Attacked President Trump's Characterization Of Antifa As An Organization But Did Not Endorse Or Indicate Membership In The Group. (Stephen Oatley, "BREAKING: Does a former Dominion Voter Systems VP and current patent holder have ties to the terrorist group (or idea) known as Antifa?" [[HYPERLINK "https://www.ptnewsnetwork.com/breaking-does-a-former-dominion-voter-systems-vp-and-current-patent-holder-have-ties-to-the-terrorist-group-or-idea-known-as-antifa/"](https://www.ptnewsnetwork.com/breaking-does-a-former-dominion-voter-systems-vp-and-current-patent-holder-have-ties-to-the-terrorist-group-or-idea-known-as-antifa/)], 11/13/20)



Eric Coomer

June 2 · 🌐

...

In case you didn't know:

"Antifa" has made a statement:

TO: ALL MEDIA

PUBLIC STATEMENT FROM: "ANTIFA," IN RESPONSE TO THE THREATS
ISSUED BY UNITED STATES PRESIDENT DONALD J. TRUMP

Dear Mr. Trump:

Let us be perfectly clear:

"Antifa" isn't an organization. There's no membership, no meetings, no dues, no rules, no leaders, no structure. It is, literally, an idea and nothing more. Even the claim of this author to represent "Antifa" is one made unilaterally for the purposes of this communication and nothing more; there is no governing body nor trademark owner to dispute the author's right to represent "AntiFa."

"Antifa" is a neologism constructed from a contraction of the phrase "anti-fascist." The truth is, there's no such thing as being "anti-Fascist." Either you are a decent human being with a conscience, or you are a fascist.

The ostensible president of the United States has, today, openly declared that he is a fascist, and that he intends to turn the military power of the United States into a fascist tool.

Now there is no question, and we can stop pretending that this man represents anything but the worst in humanity, which his supporters embody.

And that is the only effect his words will have.

It will likely be no problem for LEO to identify the author of this document, who also has maintained the "AntiFa" page on Facebook since founding it in 2017.

The author of this document is unconcerned with that inevitability because neither that author, nor this document, has been involved in a crime of any sort in any way.

But, since both the "president" and the media insist on acting as though "AntiFa" is this big, scary organization, the author supposes it's time for "AntiFa" to make a statement.

Thus:

"AntiFa supports and defends the right of all people to live free from

Message

Sent: 12/13/2020 2:43:26 PM
To: Zach Parkinson [zparkinson@donaldtrump.com]; Matt VanHyfte [mvanhyfte@donaldtrump.com]; Jacki Kotkiewicz [jkotkiewicz@donaldtrump.com]
Subject: RE: Project
Attachments: Dominion, Smartmatic , Sequoia And Venezuela.docx

Attached here.

Not polished but I think we answered all of the questions.

The common theme here is that Dominion and Smartmatic were only in a partnership for three years nearly a decade ago but there has been some common connections with 3rd party groups, although not at the same time.

The election technology industry seems to be constantly buying and selling the same companies back and forth and continuously rebranding themselves.

From: Zach Parkinson <zparkinson@donaldtrump.com>
Sent: Friday, November 13, 2020 9:53 PM
To: Dean Cleary <dcleary@donaldtrump.com>; Matt VanHyfte <mvanhyfte@donaldtrump.com>; Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>
Subject: RE: Project

Let's cut this off at 10:30. Have more dead voters we'll need to get to in the morning.

From: Dean Cleary <dcleary@donaldtrump.com>
Sent: Friday, November 13, 2020 9:38 PM
To: Zach Parkinson <zparkinson@donaldtrump.com>; Matt VanHyfte <mvanhyfte@donaldtrump.com>; Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>
Subject: RE: Project

We are making great progress, we got an 11 page doc right now. It is very slow and tedious learning and tracing down the claims and leads. I don't have an end prediction but we got maybe three-quarters of what you asked on paper.

From: Zach Parkinson <zparkinson@donaldtrump.com>
Sent: Friday, November 13, 2020 9:36 PM
To: Matt VanHyfte <mvanhyfte@donaldtrump.com>; Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>; Dean Cleary <dcleary@donaldtrump.com>
Subject: RE: Project

How are we looking?

From: Zach Parkinson
Sent: Friday, November 13, 2020 6:06 PM
To: Matt VanHyfte <mvanhyfte@donaldtrump.com>; Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>; Dean Cleary <dcleary@donaldtrump.com>
Subject: RE: Project

We need to look at these questions. Obviously, this is some conspiratorial stuff, but we need to be thorough and track it down. The two attached jpgs have the background on this "theory".

Want the same format and type of product as last night. Attached is the final version of that for reference.

- Smartmatic
 - What is the relationship between Smartmatic and Dominion?
 - Do Dominion machines or software use software from Smartmatic?
 - Smartmatic is supposedly Spanish-owned. If so, are the votes somehow sent “overseas” to Spain when they are counted or tabulated?
 - Is Dominion somehow owned by Smartmatic through a company named Indra?
 - What is Smartmatic’s relationship to Venezuela and the Venezuelan government?
- Poulos
 - Is there some type of evidence that Poulos has “contributed” to antifa?

From: Matt VanHyfte <mvanhyfte@donaldtrump.com>

Sent: Friday, November 13, 2020 5:15 PM

To: Zach Parkinson <zparkinson@donaldtrump.com>; Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>; Dean Cleary <dcleary@donaldtrump.com>

Subject: Re: Project

Just a heads up for all, I’m picking up my dog currently. But should not take long. I’ll hop on ASAP.

From: Zach Parkinson <zparkinson@donaldtrump.com>

Sent: Friday, November 13, 2020 5:13:43 PM

To: Jacki Kotkiewicz <jkotkiewicz@donaldtrump.com>; Dean Cleary <dcleary@donaldtrump.com>; Matt VanHyfte <mvanhyfte@donaldtrump.com>

Subject: Project

About to send y’all a Dominion-related project we need to look at, so don’t head to the bar. I’ll send specific things we need to look into and substantiate or debunk.

Dominion, Smartmatic, Sequoia And Venezuela

TOPLINES

Dominion And Smartmatic Are Independent Companies That Split From Each Other In 2012,

- Both Dominion and Smartmatic are companies that provide election systems consulting
- Dominion entered into a partnership with Smartmatic in 2009
 - Dominion provided Smartmatic with voter machines used in the 2010 and 2013 Philippine elections
 - There were highly publicized glitches in the machines that caused reputational harm on Dominion.
- Dominion and Smartmatic terminated their partnership in 2012 after Smartmatic began doing business in Puerto Rico which Dominion interpreted as a violation of a noncompetition agreement in the United States
 - There is no evidence Dominion used Smartmatic technology in their machines in the 2020 election

There Is No Apparent Relationship Between Smartmatic And The Spanish Company Indra,

- Smartmatic claims that it has no relationship with Indra
- Smartmatic and Indra are rivals in the Philippines
- There is no evidence that votes were being counted overseas in Spain
 - The co-founder and CEO of Smartmatic is a Spanish-Venezuelan Citizen who now lives in London.
 - Smartmatic is headquartered in London

Dominion Has Not Direct Ties To Venezuela

- While Dominion has no company ties to Venezuela, Smartmatic does through its owners
- Smartmatic was investigated by the Committee on Foreign Investment in the United States due to its ties to Venezuela
- In 2004, Smartmatic was chosen by Venezuelan authorities to be used in a contentious referendum that confirmed Chavez as President
 - This election is believed to have been tampered with, as the algorithm appeared to adjust the vote in Chavez favor
- Before this election, the Venezuelan government invested in a smaller company tied to Smartmatic through its owners
 - In return for the investment, the Venezuelan government agency was given a 28 percent stake and a seat on its board
 - The Venezuelan government placed a senior official of the Science Ministry and advisor to Chavez on elections technology, Omar Montilla, on the board

- Venezuelan officials insist the money invested was repaid, and that Venezuela never directly had a stake in Smartmatic

Sequoia Was Owned By Smartmatic From 2005 to 2007 And Not Purchased By Dominion Until 2010

- Smartmatic owned Sequoia voting machines from 2005 to 2007
- While Smartmatic owned Sequoia, Sequoia machines caused irregularities in Chicago
- Dominion bought Sequoia in 2010, three years after Smartmatic sold the company

There Is No Evidence That Dominion’s CEO Or Any Other Leader Of The Group Has Ties To Antifa

- There is no evidence that Dominion CEO John Poulos has tied to Antifa
- There is an internet rumor that Dominion’s Director Of Product Safety, Dr. Eric Coomer, had ties to Antifa
 - Coomer allegedly posted (now deleted) some songs to his Facebook Page that were anti-police.
 - Coomer also wrote a facebook post (now deleted) in which he criticized President Trump for characterizing Antifa as an organization.
 - There is no evidence Coomer is a member or has any ties to Antifa

COMPANY PROFILE

Smartmatic Has A Global Presence

Smartmatic Was Established In Florida In The Wake Of The 2000 Election. “Established in Florida in the wake of the 2000 election, Smartmatic focused on building the most secure, accessible and easy-to-use election technologies ever designed, to safeguard the election process from start to finish.” (“About Smartmatic,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)

- **In 2005, Smartmatic First Launched Its Technology In The United States.** (“Our History,” [HYPERLINK "https://www.smartmatic.com/us/about/our-history/"], Accessed 11/13/20)

Smartmatic Has Designed And Implemented Secure Voting Technologies For Election Commissions On 5 Continents In 25 Countries. “Today, Smartmatic is the world leader in election technology. From Chicago to Manila. From Utah to Belgium. And from Los Angeles to London – since 2003 Smartmatic has successfully designed and implemented secure voting technologies for election commissions on five continents in 25 countries. We’ve recorded and tabulated more than 5 billion votes with zero security breaches.” (“About Smartmatic,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)

Smartmatic Invests “Substantial Resources” Into Research And Development In Its Three Centers: The Americas, Europe, And Asia. “Committed to innovation, Smartmatic invests substantial resources in its three R&D centers in the Americas, Europe and Asia.” (“About Smartmatic,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)

Company Leadership

Smartmatic Board Of Directors:

- **Roger Piñate, Director – Smartmatic Global Board** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)
- **Peter Neffenger, Chairman – Smartmatic USA Board** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)
- **Gracia Hillman, Director – Smartmatic USA Board** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)
- **David Melville, Director And Chief Counsel – Smartmatic Global Board** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)
- **Robert Cook, Executive Director – Smartmatic USA Board** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)
- **Paul DeGregorio, Director – Smartmatic USA Board** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)

Global Management Team:

- **Antonio Mugica, Chief Executive Officer** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)
- **Roger Piñate, President** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)
- **Pedro Mugica, President – Global Sales** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/en/about/our-team/"], Accessed 11/13/20)

U.S. Leadership Team:

- **Denis Bechac, Business Development** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)
- **Samira Saba, Director – Communications** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)
- **Liliana Armas, General Counsel – Americas** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)
- **Edwin Smith, Director – Certification** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)
- **Shari Little, Product Management Director** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)
- **Jeff Scott, Business Product Manager** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)

Los Angeles – VSAP Project – Management Team:

- **James Long, VSAP Project Director** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)
- **Dan Murphy, VSAP Engagement Director** (“Our Team,” [HYPERLINK "https://www.smartmatic.com/us/about/leadership/"], Accessed 11/13/20)

- **Angie McWhorter, VSAP Project Manager** (“Our Team,” [[HYPERLINK "https://www.smartmatic.com/us/about/leadership/"](https://www.smartmatic.com/us/about/leadership/)], Accessed 11/13/20)

Smartmatic Is Privately Owned

Smartmatic Is Privately Owned By SGO, Employees, And Angel Investors. “Two of the founders, Antonio Mugica and Roger Piñate, continue to run the company as CEO and President, respectively. The majority of shares (83%) are held by SGO, a company owned by the Mugica and Piñate families. The remaining shares are held by employees (10%) and angel investors (7%).” (“Smartmatic Fact-Checked,” [[HYPERLINK "https://www.smartmatic.com/us/smartmatic-fact-checked/"](https://www.smartmatic.com/us/smartmatic-fact-checked/)], Accessed 11/13/20)

Smartmatic Does Not Own Any Other Voting Machine Company Currently. “Does Smartmatic own any other voting machine company? No.” (“Smartmatic Fact-Checked,” [[HYPERLINK "https://www.smartmatic.com/us/smartmatic-fact-checked/"](https://www.smartmatic.com/us/smartmatic-fact-checked/)], Accessed 11/13/20)

Smartmatic’s Software Is Not Licensed For Use In Other Company’s Voting Machines. “Is Smartmatic’s software used in other company’s voting machines? No. Smartmatic’s software is not licensed or otherwise used by other companies.” (“Smartmatic Fact-Checked,” [[HYPERLINK "https://www.smartmatic.com/us/smartmatic-fact-checked/"](https://www.smartmatic.com/us/smartmatic-fact-checked/)], Accessed 11/13/20)

Smartmatic Has Transparency Problems

Smartmatic Is Not Transparent, As The Company Has Been “Restructured Into An Elaborate Web Of Offshore Companies And Foreign Trusts.” “But the role of the young Venezuelan engineers who founded Smartmatic has become less visible in public documents as the company has been restructured into an elaborate web of offshore companies and foreign trusts.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

Smartmatic Was Reorganized In An Array Of Holding Companies Based In Delaware, The Netherlands, And Curaçao, With The Firm’s Ownership Further Shielded In Two Curaçao Trusts. “More recent corporate documents show that before and after Smartmatic’s purchase of Sequoia from a British-owned firm, the company was reorganized in an array of holding companies based in Delaware (Smartmatic International), the Netherlands (Smartmatic International Holding, B.V.), and Curaçao (Smartmatic International Group, N.V.). The firm’s ownership was further shielded in two Curaçao trusts.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

- **Smartmatic Claims The Reorganization Was Done To Expand The Company’s International Operations, Not To Hide Its Ownership.** “Mr. Stoller, the Smartmatic spokesman, said that the reorganization was done simply to help expand the company’s international operations, and that it had not tried to hide its ownership, which he said was more than 75 percent in the hands of Mr. Mugica and his family.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

POLITICAL TIES & DONATIONS

Smartmatic Employees Have Made Nearly Than \$12,000 In Political Donations, But These Have Predominantly Gone To Democrats

Smartmatic Employees Have Donated A Total Of \$256.86 To Political Candidates Or Committees. ([[HYPERLINK "https://www.fec.gov/data/receipts/individual-contributions/?contributor_employer=smartmatic"](https://www.fec.gov/data/receipts/individual-contributions/?contributor_employer=smartmatic)], Accessed 11/13/20)

Of That Amount, \$166.86 – Or 85 Percent – Went To Democratic Candidates Or Committees. ([HYPERLINK "https://www.fec.gov/data/receipts/individual-contributions/?contributor_employer=smartmatic"], Accessed 11/13/20)

- **Two Employees Donated A Total Of \$90.00 To President Trump.** ([HYPERLINK "https://www.fec.gov/data/receipts/individual-contributions/?contributor_employer=smartmatic"], Accessed 11/13/20)

Smartmatic General Counsel, Liliana Parnas, Has Donated \$11,515.86 To ActBlue, Earmarked For People Powered Action. ([HYPERLINK "https://www.fec.gov/data/receipts/?data_type=processed&contributor_name=Liliana+Armas&two_year_transaction_period=2020&min_date=01%2F01%2F2019&max_date=12%2F31%2F2020&contributor_state=FL"], Accessed, 11/13/20)

Note: Smartmatic Employees Are Prohibited From Making Political Donations. ("Smartmatic Fact-Checked," [HYPERLINK "https://www.smartmatic.com/us/smartmatic-fact-checked/"], Accessed 11/13/20)

DOMINION VOTING SYSTEMS AND SMARTMATIC'S SHORT-LIVED PARTNERSHIP

Dominion Voting Systems And Smartmatic Are Independent Companies That Offer Election Management Systems

Dominion Voting Systems Corporation Is A Company That Provides Election Planning And Voting Systems Such As Voter List Management, Voter List Strike-Off And Poll Tabulation. "Dominion Voting Systems Corporation provides election planning processes and voting system services. The Company offers voter list management, voter list strike-off, and poll tabulation." ("Dominion Voting Systems Corp," [HYPERLINK "https://www.bloomberg.com/profile/company/3614901Z:CN"], Accessed 11/13/20)

- **Dominion Voting Systems, Inc. Is Registered In Colorado And Has An Office In Denver.** (Colorado Business Entity Search, [HYPERLINK "https://www.sos.state.co.us/biz/BusinessEntityDetail.do?quitButtonDestination=BusinessEntityResults&nameTyp=ENT&masterFileId=20101359683&entityId2=20101359683&fileId=20101359683&srchTyp=ENTITY"], Accessed 11/12/20; Dominion Voting Systems, Periodic Report, [HYPERLINK "https://www.sos.state.co.us/biz/ViewImage.do?masterFileId=20101359683&fileId=20201336566"], Filed 4/15/20; [HYPERLINK "https://www.dominionvoting.com/about/"], Accessed 11/12/20)

Smartmatic Corporation Is An Electoral Project Management And Consulting Company. "Smartmatic Corporation provides automated election systems. The Company offers electoral project management and consulting, voter education and information campaigns, consulting of electoral processes and documentation, including legal consulting. Smartmatic serves customers worldwide." ("Smartmatic Corp," [HYPERLINK "https://www.bloomberg.com/profile/company/576460Z:US"] \l":~:text=Smartmatic%20Corporation%20provides%20automated%20election,Smartmatic%20serves%20customers%20worldwide."], Accessed 11/13/20)

Dominion Voting Systems Does Not Own Smartmatic

Dominion Voting Systems Does Not Own Smartmatic. "Neither Smartmatic or Mr. Soros has any ownership interest whatsoever in Dominion, and they have had no ownership interest in the past. Dominion has no relationship whatsoever with Mr. Soros, his companies or his foundations." ("Dominion Voting Systems Ownership: Fact Check," [HYPERLINK "https://www.co.hunterdon.nj.us/pdf/ElectionBd/2016-HunterdonCountyVotingMachineFactCheck.pdf"], 10/25/16)

Snopes: Dominion Has No Company Ownership Relationships With Smartmatic. “Dominion has no company ownership relationships with any member of the Pelosi family, the Feinstein family, or the Clinton Global Initiative, Smartmatic, or any ties to Venezuela. Dominion works with all political parties; our customer base and our government outreach practices reflect this nonpartisan approach.” (Dan Evon “Rumor Alert: Dominion Voting Systems Fraud Claims,” [[HYPERLINK "https://www.snopes.com/fact-check/rumor-alert-dominion-voting-systems-fraud-claims/"](https://www.snopes.com/fact-check/rumor-alert-dominion-voting-systems-fraud-claims/)], 11/8/20)

In 2009, Dominion Entered Into A Contract Providing Optical Scanners To Smartmatic

In 2009, Dominion Entered Into A Contract With Smartmatic In Which They Provided Smartmatic Optical Scanners To Be Used In The 2010 Philippine Election. “Dominion entered into a 2009 contract with Smartmatic and provided Smartmatic with the PCOS machines (optical scanners) that were used in the 2010 Philippine election, the biggest automated election run by a private company. The automation of that first election in the Philippines was hailed by the international community and by the critics of the automation. The results transmission reached 90% of votes four hours after polls closed and Filipinos knew for the first time who would be their new president on Election Day. In keeping with local Election law requirements, Smartmatic and Dominion were required to provide the source code of the voting machines prior to elections so that it could be independently verified.” (“Voting Technology Companies in the U.S. - Their Histories and Present Contributions,” [[HYPERLINK "https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions"](https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions)] , 8/10/17)

Smartmatic’s Reputation Suffered After Glitches In The Philippine Elections

Dominion And Smartmatic’s Reputations Suffered After A Series Of High Profile Glitches In The 2010 And 2013 Philippine Elections. “Both companies’ reputations suffered as a result of heavily publicized litigation relating to a software glitch that was resolved just before the 2010 election and that litigation rumbled on to partly affect the mid-term elections in 2013. However, for the 2016 elections in the Philippines, Smartmatic operated with their own technology having released a new vote counting machine which replaced the previous version, resulting in ‘the speediest canvassing proceedings in the country’s history.” (“Voting Technology Companies in the U.S. - Their Histories and Present Contributions,” [[HYPERLINK "https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions"](https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions)] , 8/10/17)

Litigation Over Smartmatic “Glitches” Has Alleged An Impact On The 2010 And 2013 Mid-Term Elections In The Philippines. “Litigation over Smartmatic ‘glitches’ alleges they impacted the 2010 and 2013 mid-term elections in the Philippines, raising questions of cheating and fraud. An independent review of the source codes used in the machines found multiple problems, which concluded, ‘The software inventory provided by Smartmatic is inadequate, ... which brings into question the software credibility,’ ABS-CBN reported.” (Bethany Blankley, “Officials Raised Concerns For Years About Security Of US Voting Machines, Software Systems,” [[HYPERLINK "https://www.washingtonexaminer.com/politics/officials-raised-concerns-for-years-about-security-of-us-voting-machines-software-systems"](https://www.washingtonexaminer.com/politics/officials-raised-concerns-for-years-about-security-of-us-voting-machines-software-systems)] , 11/9/20)

Note: Smartmatic’s Chairman Is Loosely Affiliated With George Soros

Smartmatic’s Chairman, Mark Malloch Brown, Is A Member Of The British House Of Lords And Was A Former Vice-Chairman Of George Soros’ Investment Funds. “Smartmatic’s chairman is a member of the British House of Lords, Mark Malloch Brown, a former vice-chairman of George Soros’ Investment Funds, former vice-president at the World Bank, lead international partner at Sawyer Miller, a political consulting firm, and former vice-chair of the World Economic Forum who “remains deeply involved in international affairs.” The company’s reported globalist ties have caused members of the media and government officials to raise questions about its involvement in the U.S. electoral process.”

(Bethany Blankley, “Officials Raised Concerns For Years About Security Of US Voting Machines, Software Systems,” [[HYPERLINK](https://www.washingtonexaminer.com/politics/officials-raised-concerns-for-years-about-security-of-us-voting-machines-software-systems)

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"<https://www.washingtonexaminer.com/politics/officials-raised-concerns-for-years-about-security-of-us-voting-machines-software-systems>"], 11/9/20)

Dominion And Smartmatic Terminated Their Contract In 2012 Over A Disagreement Regarding A Noncompetition Agreement In Puerto Rico

In 2012, Dominion Accused Smartmatic Of Breaching A Noncompetition Clause By Conducting Business In Puerto Rico – Smartmatic Claimed That Puerto Rico Was Not Part Of The United States And Therefore Was Not In Violation Of An Agreement Not To Compete In The United States. “In 2012, Smartmatic submitted a bid to sell the licensed voting systems to the government of Puerto Rico for its upcoming elections. Dominion also submitted a bid. Upon learning of Smartmatic’s bid, Dominion notified Smartmatic by letter that Smartmatic was in breach of the license agreement’s noncompetition provision, asserting that Puerto Rico is ‘in the United States.’ Dominion also purported to terminate the agreement as a result of the alleged breach. Smartmatic rejected Dominion’s termination as invalid, contending that Puerto Rico is not ‘in the United States.’ Following its purported termination of the license agreement, Dominion ceased performing its contractual obligations, leading Smartmatic to file suit in the Court of Chancery. In response, Dominion asserted counterclaims.” (“Smartmatic Int’l Corp. v. Dominion Voting Sys. Int’l Corp., C.A. No. 7844-VCP (Del. Ch. May 1, 2013) (Parsons, V.C.),” [[HYPERLINK "https://www.potteranderson.com/delawarecase-77.html"](https://www.potteranderson.com/delawarecase-77.html)] , 5/1/13)

There Is No Evidence That Dominion Used Smartmatic’s Software In The 2020 Election Cycle

The Partnership Between Dominion And Smartmatic Ended In 2012 “On Rocky Terms.” “As previously mentioned, Smartmatic and Dominion Voting have shared tumultuous interactions. Their 2009 partnership ended on rocky terms. The termination of their agreement in 2012 had the potential to deny Smartmatic access to vital material and information necessary to correct any issues with the PCOS voting devices, which created an understandable fear among the Filipino public since Smartmatic had been contracted to provide the PCOS systems for the May 2013 mid-term elections. However, for the mid-term 2013 elections, Smartmatic deployed 76,000 machines and only 258 of those had to be replaced, and in many cases, it was due to handling errors rather than machine failures.” (“Voting Technology Companies in the U.S. - Their Histories and Present Contributions,” [[HYPERLINK "https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions"](https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories-and-Present-Contributions)] , 8/10/17)

THERE IS NO APPARENT RELATIONSHIP BETWEEN SMARTMATIC AND INDRA

Smartmatic And Indra Do Not Appear To Have Ties

Smartmatic Claims To Not Have Any Ties To Indra Sistemas According To Its Website. “Does Smartmatic have any ties to Indra Sistemas? No.” (“Smartmatic Fact-Checked,” [[HYPERLINK "https://www.smartmatic.com/us/smartmatic-fact-checked/"](https://www.smartmatic.com/us/smartmatic-fact-checked/)] , Accessed 11/13/20)

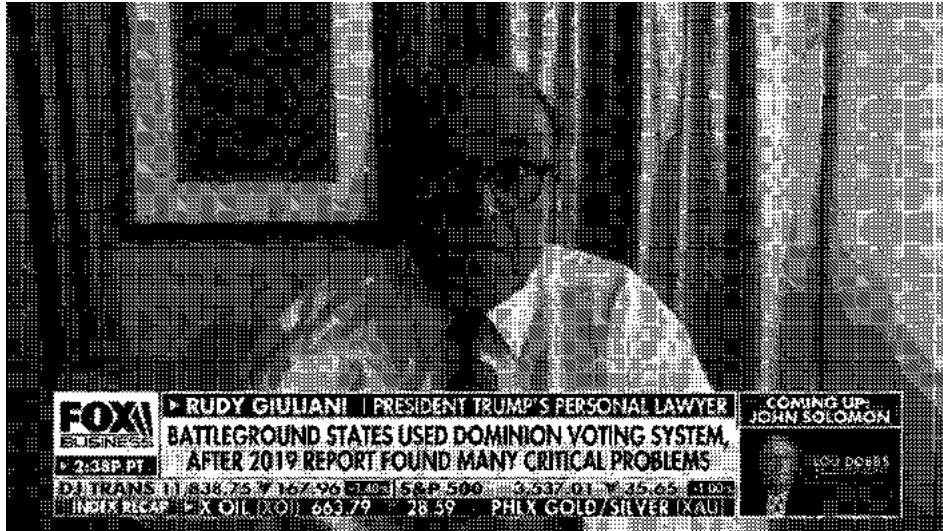
Smartmatic And Indra Are Rivals

Smartmatic And Indra Were Considered Rival Companies In The Philippines. “It looks like the war between two technology providers vying for a P2.5-billion contract at the Commission on Elections (Comelec) for the 2016 presidential polls has begun. Smartmatic-TIM Corp., which provided the technology during the last two elections in the country, has questioned the eligibility of rival Indra Sistemas S.A. to participate in the public bidding for the lease of 23,000 optical mark reader (OMR) machines for the forthcoming balloting. In a statement, Smartmatic-TIM lead counsel Ruby Yusi said the approval of Indra’s eligibility in the first stage of the bidding process was questionable since the Spanish company failed to properly designate a local representative for the bidding.” (“It’s War Between 2 Tech Firms For

Comelec Contract," [HYPERLINK "https://business.inquirer.net/184165/its-war-between-2-tech-firms-for-comelec-contract"], 12/29/14)

Rudy Giuliani Claimed That Smartmatic Sent Its Votes Overseas To Barcelona To Be Counted

On November 12, Rudy Giuliani Claimed On Fox Business That Votes From The Dominion Machines Sent The Votes To Be Counted In Barcelona, Spain. RUDY GIULIANI: "Dominion is a Canadian company but all of its software is Smartmatic Software. The votes actually go to Barcelona, Spain." (Fox Business' "Lou Dobbs Tonight," 11/12/20)



[HYPERLINK
"https://www.youtube.com/watch?v=evpejvWAh9w&feature=youtu.be&t=156&ab_channel=FrontPageIndex"]

However, The Only Apparent Evidence That Votes Were Being Counted In Spain Was That Smartmatic Is Owned By A Spanish Person

Antonio Mugica Is The CEO And Co-Founder Of Smartmatic Corp. ("Antonio Mugica," [HYPERLINK "https://www.bloomberg.com/profile/person/15135990"], Accessed 11/13/20)

Mugica Is A Spanish-Venezuelan Dual National. "The firm said it is owned primarily by three entrepreneurs: Antonio Mugica, a dual-Spanish-Venezuelan national." ("Voting Machine Company Vows No Connection to Venezuelan President Chavez," [HYPERLINK "https://www.govtech.com/security/Voting-Machine-Company-Vows-No-Connection.html"], 1/1/06)

Mugica Lives In London, United Kingdom. (Antonio Mugica, [HYPERLINK "https://www.linkedin.com/in/antoniomugica/?originalSubdomain=uk"], Accessed 11/13/20)

Smartmatic Is Headquartered In London, United Kingdom. ("Get in touch with us," [HYPERLINK "https://www.smartmatic.com/us/contact/"], Accessed 11/13/20)

VENEZUELA

Dominion Has No Company Ties To Venezuela

Snopes: Dominion Has No Company Ties To Venezuela. "Dominion has no company ownership relationships with any member of the Pelosi family, the Feinstein family, or the Clinton Global Initiative, Smartmatic, or any ties to Venezuela. Dominion works with all political parties; our customer base and

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our government outreach practices reflect this nonpartisan approach.” (Dan Evon “Rumor Alert: Dominion Voting Systems Fraud Claims,” [[HYPERLINK "https://www.snopes.com/fact-check/rumor-alert-dominion-voting-systems-fraud-claims/"](https://www.snopes.com/fact-check/rumor-alert-dominion-voting-systems-fraud-claims/)], 11/8/20)

Smartmatic’s Ties To Venezuela

Smartmatic’s Business Address Was Originally Registered To The Father Of One Of The Two Young Venezuelan Engineers Who Were Its Principal Officers, Antonio Mugica And Alfredo Anzola.

“Smartmatic was then a fledgling technology start-up. Its registered address was the Boca Raton, Fla., home of the father of one of the two young Venezuelan engineers who were its principal officers, Antonio Mugica and Alfredo Anzola, and it had a one-room office with a single secretary.” (Tim Golden, “U.S. Investigates

Voting Machines’ Venezuela Ties,” [[HYPERLINK](https://www.nytimes.com/2006/10/29/washington/29ballot.html)

"https://www.nytimes.com/2006/10/29/washington/29ballot.html"], 10/29/06)

The Concerns About Possible Ties Between The Owners Of Smartmatic And The Chávez Government Have Been Well Known To U.S. Foreign Policy Officials Since 2004.

“The concerns about possible ties between the owners of Smartmatic and the Chávez government have been well known to United States foreign-policy officials since before the 2004 recall election in which Mr. Chávez, a strong ally of President Fidel Castro of Cuba, won by an official margin of nearly 20 percent.” (Tim Golden, “U.S.

Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK](https://www.nytimes.com/2006/10/29/washington/29ballot.html)

"https://www.nytimes.com/2006/10/29/washington/29ballot.html"], 10/29/06)

In 2006, The Committee On Foreign Investment In The United States Opened An Investigation Into Smartmatic.

“The federal government is investigating the takeover last year of a leading American manufacturer of electronic voting systems by a small software company that has been linked to the leftist Venezuelan government of President Hugo Chávez. The inquiry is focusing on the Venezuelan owners of the software company, the Smartmatic Corporation, and is trying to determine whether the government in Caracas has any control or influence over the firm’s operations, government officials and others familiar with the investigation said. The inquiry on the eve of the midterm elections is being conducted by the Committee on Foreign Investment in the United States, or Cfius, the same panel of 12 government agencies that reviewed the abortive attempt by a company in Dubai to take over operations at six American ports earlier this year.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK](https://www.nytimes.com/2006/10/29/washington/29ballot.html)

"https://www.nytimes.com/2006/10/29/washington/29ballot.html"], 10/29/06)

The Venezuelan Government Invested Heavily In Smartmatic’s Owners

In 2004, Smartmatic Was Chosen By Venezuelan Authorities To Be Used In A Contentious Referendum That Confirmed Hugo Chávez As President.

“Smartmatic was a little-known firm with no experience in voting technology before it was chosen by the Venezuelan authorities to replace the country’s elections machinery ahead of a contentious referendum that confirmed Mr. Chávez as president in August 2004.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK](https://www.nytimes.com/2006/10/29/washington/29ballot.html)

"https://www.nytimes.com/2006/10/29/washington/29ballot.html"], 10/29/06)

- **This Election Involved “A Very Subtle Algorithm” That Appeared To Adjust The Vote In Chávez’s Favor.** “Turning to Venezuela, he said that Chavez controlled all of the country’s voting equipment before he won a 2004 nationwide recall vote that had threatened to end his rule. When Chavez won, Venezuelan mathematicians challenged results that showed him to be consistently strong in parts of the country where he had weak support. The mathematicians found ‘a very subtle algorithm’ that appeared to adjust the vote in Chavez’s favor, Stigall said.” (Greg Gordon, “Most Electronic Voting Isn’t Secure, CIA Expert Says,” [[HYPERLINK "https://www.mcclatchydc.com/news/politics-government/article24530650.html"](https://www.mcclatchydc.com/news/politics-government/article24530650.html)] , 3/24/09)

Months Before This Contract Was Awarded To Smartmatic, A Venezuelan Government Financing Agency Invested Over \$200,000 Into A Technology Company Owned By Some Of The Same People As Smartmatic, That Joined With Smartmatic As A Minor Partner In The Bid. “Seven months before that voting contract was awarded, a Venezuelan government financing agency invested more than \$200,000 into a smaller technology company, owned by some of the same people as Smartmatic, that joined with Smartmatic as a minor partner in the bid.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

- **This Smaller Company Was Called The Bizta Corporation.** “Opposition members of Venezuela’s electoral council had also protested that they were excluded from the bidding process in which Smartmatic and a smaller company, the Bizta Corporation, were selected to replace a \$120 million system that had been built by Election Systems and Software of Omaha.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

In Return, The Venezuelan Government Agency Was Given A 28 Percent Stake In The Smaller Company And A Seat On Its Board. “In return, the government agency was given a 28 percent stake in the smaller company and a seat on its board, which was occupied by a senior government official who had previously advised Mr. Chávez on elections technology. But Venezuelan officials later insisted that the money was merely a small-business loan and that it was repaid before the referendum.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

- **The Venezuelan Government Placed A Senior Official Of The Science Ministry, Omar Montilla, On Bizta’s Board.** “Weeks before Bizta and Smartmatic won the referendum contract, the government also placed a senior official of the Science Ministry, Omar Montilla, on Bizta’s board, alongside Mr. Mugica and Mr. Anzola.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)
- **Montilla Acted As An Adviser To Chávez On Elections Technology.** “Mr. Montilla, The Herald reported, had acted as an adviser to Mr. Chávez on elections technology.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

In 2006, A Smartmatic Spokesperson Denied That Venezuela Has Ever Held Any Stake In Smartmatic, But Acknowledged The Role The Venezuelan Government Played In The “Separate Company” Bizta. “‘No foreign government or entity, including Venezuela, has ever held any stake in Smartmatic,’ Mr. Stoller said. ‘Smartmatic has always been a privately held company, and despite that, we’ve been fully transparent about the ownership of the corporation.’ Mr. Stoller emphasized that Bizta was a separate company and said the shares the Venezuelan government received in it were ‘the guarantee for a loan.’” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

Venezuelan Officials Insisted The Money Invested In Bizta Was “Merely A Small-Business Loan And That It Was Repaid Before The Referendum.” “But Venezuelan officials later insisted that the money was merely a small-business loan and that it was repaid before the referendum.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

SMARTMATIC OWNED SEQUOIA BETWEEN 2005 AND 2007

In 2005, Smartmatic Bought Sequoia Voting Systems

In 2005, Smartmatic Bought Sequoia Voting Systems With A Windfall Of \$120 Million From Its Contracts With Venezuela. “With a windfall of some \$120 million from its first three contracts with Venezuela, Smartmatic then bought the much larger and more established Sequoia Voting Systems, which now has voting equipment installed in 17 states and the District of Columbia.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

While Smartmatic Owned Sequoia, Sequoia Voting Machines Caused Irregularities In Chicago

In March 2006, A Series Of Delays And Irregularities In Chicago Were Blamed On Sequoia Voting Machines, Traceable To Smartmatic Workers And Software Issues From Venezuela. “But after a municipal primary election in Chicago in March, Sequoia voting machines were blamed for a series of delays and irregularities. Smartmatic’s new president, Jack A. Blaine, acknowledged in a public hearing that Smartmatic workers had been flown up from Venezuela to help with the vote. Some problems with the election were later blamed on a software component, which transmits the voting results to a central computer, that was developed in Venezuela.” (Tim Golden, “U.S. Investigates Voting Machines’ Venezuela Ties,” [[HYPERLINK "https://www.nytimes.com/2006/10/29/washington/29ballot.html"](https://www.nytimes.com/2006/10/29/washington/29ballot.html)], 10/29/06)

In 2007, Smartmatic Sold Sequoia Voting Machines

In 2007, Smartmatic Was Forced To Sell Sequoia Voting Systems. “On December 22, 2006, Smartmatic Corporation announced the company's intention to sell Sequoia Voting Systems. At that time, Smartmatic CEO Antonio Mugica stated, ‘Sequoia's customer base has grown substantially and its revenues have increased four-fold. However, given the current climate of the United States marketplace with so much public debate over foreign ownership of firms in an area that is viewed as critical U.S. infrastructure - election technology - we feel it is in both companies' best interests to move forward as separate entities with separate ownership. As part of this process, we plan to sell our Sequoia Voting Systems ownership.’ Sequoia Voting Systems worked for many months with Smartmatic to find an appropriate situation that would be a win-win for both companies. Given Sequoia's strong position in the US electoral market and significant opportunities therein, many buyers expressed interest in Sequoia. Smartmatic selected this team to purchase Sequoia as they believe in the ability of Sequoia's current management team to perform as successfully as they have in the past, which will allow Smartmatic to capitalize on the earn-out purchase plan.” (Press Release, “U.S. Voting Technology Leader Sequoia Voting Systems Announces New Corporate Ownership,” [[HYPERLINK "http://web.archive.org/web/20071226071517/http://www.sequoiavote.com/pressText.php?pressIn=41"](http://web.archive.org/web/20071226071517/http://www.sequoiavote.com/pressText.php?pressIn=41)], 11/8/07)

- **Jack Blaine And Peter McManemy Led The Purchase Of Sequoia From Smartmatic, Making The Company U.S. Owned.** “The investment group, led by Sequoia President & CEO Jack Blaine and company Chief Financial Officer Peter McManemy, purchased Sequoia from former parent company Smartmatic Corporation for an undisclosed sum. As with most transactions involving two private entities, the specific terms of the sale are not being disclosed. However, this transaction does include investment by the management team, a small loan and an earn-out. This scenario provides an excellent financial structure for Sequoia to leverage and completely eliminates Smartmatic's ownership, control and operational rights of any kind in Sequoia.” (Press Release, “U.S. Voting Technology Leader Sequoia Voting Systems Announces New Corporate Ownership,” [[HYPERLINK "http://web.archive.org/web/20071226071517/http://www.sequoiavote.com/pressText.php?pressIn=41"](http://web.archive.org/web/20071226071517/http://www.sequoiavote.com/pressText.php?pressIn=41)], 11/8/07)

"http://web.archive.org/web/20071226071517/http://www.sequoiavote.com/pressText.php?pre
ssIn=41"], 11/8/07)

In 2008, It Was Revealed Smartmatic's Intellectual Property Still Existed In Sequoia's Machines.

"In return, Smartmatic promises to grant to Hart a license to use its intellectual property currently found in Sequoia's machines." (Civil Action No. 3585-VCL, [HYPERLINK

"https://courts.delaware.gov/opinions/(q12dhpay5yxgbz55qzb5h0nb)/download.aspx?ID=105040"], 3/31/08)

Sequoia Was Acquired By Dominion In 2020

In 2010, Sequoia Was Acquired By Dominion Voting Systems. "After losing money for several years, on March 8, 2005, Sequoia was acquired by Smartmatic, a multi-national technology company which had developed advanced election systems, voting machines included. In November 2007, following a verdict by the CFIUS, Smartmatic was ordered to sell Sequoia, which it did to its Sequoia managers having U.S. citizenship. Sequoia Voting Systems was acquired by Denver-based Dominion Voting Systems on June 4, 2010." ("Manufacturer Profile," [HYPERLINK "https://verifiedvoting.org/election-system/sequoia-dominion-optech-insight/"], Accessed 11/13/20)

DOMINION'S LEADERSHIP HAS NO TIES TO ANTIFA

There Is No Evidence To The Claim That Dominion's Head Of Strategy And Security Has Ties To Antifa

Note: Similarly, there is no evidence that Dominion's CEO John Poulos has ties to antifa

There Is An Internet Rumor That A Top Level Employee At Dominion Has Ties To Antifa

Eric Coomer Is An Executive With Dominion Voting Systems. "Eric Coomer, an executive with Dominion Voting Systems, which sold the state its new election system last year for more than \$100 million, said the problem has to do with the way the voting machines communicate with the underlying Android operating system. He told Totenberg a minor software change will address the issue." (Kate Brumback, "Lawyers Spar Over Georgia Voting Machine Glitch, Planned fix," [HYPERLINK "https://apnews.com/article/election-2020-senate-elections-technology-georgia-elections-af357b7ab7145033f11ee34a1bbf4a3c"], 9/29/20)

- **Coomer Was The Director Of Product Strategy For Dominion.** ("Risk-Limiting Audit, Participation Group: Kickoff Conference: Colorado Secretary of State," [HYPERLINK "https://www.sos.state.co.us/pubs/elections/VotingSystems/riskAuditFiles/20170203RLAParticipantGroup.pdf" \l "page=7"], 2/3/17)

The Rumors Are Fueled Because Of Now-Deleted Anti-Police Facebook Posts

A Blogger Under The Pseudonym "Conservative Treehouse" Alleged That Dr. Eric Coomer, Who He Claimed Was The Head Of Strategy And Security For Dominion Voting Systems, Was A Supporter Of Antifa For Now-Deleted Facebook Posts In Which Coomer Allegedly Posted Anti-Police Songs.

"These are posts that Dr. Eric Coomer posted in May. He is the man that is responsible for the Strategy and Security of Dominion Voting Systems. Notice the anti-American sentiment. Eric Coomer is a major shareholder in Dominion Voting Systems, holder of election system patents and an Antifa supporter."

(Conservative Treehouse, [HYPERLINK

"https://www.facebook.com/ConservativeTreehouse/posts/3452364778132202"], 11/12/20)

Note: There are other similar posts directed at Dr. Eric Coomer

These are posts that Dr. Eric Coomer posted in May. He is the man that is responsible for the Strategy and Security of Dominion Voting Systems. Notice the anti-American sentiment. Eric Coomer is a major shareholder in Dominion Voting Systems, holder of election system patents and an Antifa supporter.



However, There Is No Evidence That Eric Coomer Is A Supporter Of Antifa In Any Way

In June, Eric Coomer Posted A Facebook Message In Which He Attacked President Trump's Characterization Of Antifa As An Organization But Did Not Endorse Or Indicate Membership In The Group. (Stephen Oatley, "BREAKING: Does a former Dominion Voter Systems VP and current patent holder have ties to the terrorist group (or idea) known as Antifa?" [[HYPERLINK "https://www.ptnewsnetwork.com/breaking-does-a-former-dominion-voter-systems-vp-and-current-patent-holder-have-ties-to-the-terrorist-group-or-idea-known-as-antifa/"](https://www.ptnewsnetwork.com/breaking-does-a-former-dominion-voter-systems-vp-and-current-patent-holder-have-ties-to-the-terrorist-group-or-idea-known-as-antifa/)], 11/13/20)



Eric Coomer

June 2 · 🌐

...

In case you didn't know:

"Antifa" has made a statement:

TO: ALL MEDIA

PUBLIC STATEMENT FROM: "ANTIFA," IN RESPONSE TO THE THREATS
ISSUED BY UNITED STATES PRESIDENT DONALD J. TRUMP

Dear Mr. Trump:

Let us be perfectly clear:

"Antifa" isn't an organization. There's no membership, no meetings, no dues, no rules, no leaders, no structure. It is, literally, an idea and nothing more. Even the claim of this author to represent "Antifa" is one made unilaterally for the purposes of this communication and nothing more; there is no governing body nor trademark owner to dispute the author's right to represent "AntiFa."

"Antifa" is a neologism constructed from a contraction of the phrase "anti-fascist." The truth is, there's no such thing as being "anti-Fascist." Either you are a decent human being with a conscience, or you are a fascist.

The ostensible president of the United States has, today, openly declared that he is a fascist, and that he intends to turn the military power of the United States into a fascist tool.

Now there is no question, and we can stop pretending that this man represents anything but the worst in humanity, which his supporters embody.

And that is the only effect his words will have.

It will likely be no problem for LEO to identify the author of this document, who also has maintained the "AntiFa" page on Facebook since founding it in 2017.

The author of this document is unconcerned with that inevitability because neither that author, nor this document, has been involved in a crime of any sort in any way.

But, since both the "president" and the media insist on acting as though "AntiFa" is this big, scary organization, the author supposes it's time for "AntiFa" to make a statement.

Thus:

"AntiFa supports and defends the right of all people to live free from



Tweet



Eric Trump ✓ @EricTrump · Nov 17



Eric Coomer - Dominions Vice President of U.S. Engineering — "Don't worry about the election, Trump's not gonna win. I made f*cking sure of that!"



This claim about election fraud is disputed



Denver Business Owner: Dominion's Eric Coomer Is an Unhinged S...
 In 2010 Eric Coomer joined Dominion as Vice President of U.S. Engineering. According to his bio, Coomer graduated from the ...
thegatewaypundit.com

2.3K

22.5K

38.5K



Liesl Bryan
@LieslBryan



Replying to @EricTrump

We need a revote in Colorado then!

3:43 PM · Nov 17, 2020 · Twitter for iPhone

8 Retweets 2 Quote Tweets 51 Likes



**Exhibit
PX 0069**



Donald J. Trump ✓
@realDonaldTrump



Replying to @realDonaldTrump

"Dominion-izing the Vote"
Part Two via @OANN @ChanelRion



From **Team Trump (Text TRUMP to 88022)** ✓

⚠️ This claim about election fraud is disputed

10:31 PM · Nov 21, 2020 · Twitter for iPhone

21.1K Retweets **1.6K** Quote Tweets **73.1K** Likes

Exhibit
PX 0070



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Donald J. Trump @realDonaldTrump · 13h
"Dominion-izing the Vote"
Part One via @OANN @ChanelRion



From Team Trump

This claim about election fraud is disputed

8.4K 33.8K 96.4K

Donald J. Trump @realDonaldTrump · 13h
"Dominion-izing the Vote"
Part Two via @OANN @ChanelRion



From Team Trump

This claim about election fraud is disputed

Thread

Donald J. Trump @realDonaldTrump

Replying to @realDonaldTrump

"Dominion-izing the Vote"
Part Three via @OANN @ChanelRion



From Team Trump

This claim about election fraud is disputed

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- One America News @OANN Your nation. Your news. #OANN
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15.5K Retweets 1.5K Quote Tweets 33.5K Likes



President-elect Marina @xoxoPatrioticRN · 13h
Replying to @realDonaldTrump @OANN and @ChanelRion
WE KNOW YOU WON BY A LANDSLIDE, MR. PRESIDENT!!! ❤️💙❤️ Don't let these frauds get away with stealing our election! 🇺🇸 #StopTheSteal #MAGA

You are a fighter and a winner!!!
We love @realDonaldTrump!!! 🙌❤️

61 10 169

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BlueDotInRedSea @channons225 · 13h
Replying to @realDonaldTrump @OANN and @ChanelRion



4 8 100



Left Coast Golfer @GolfinBum · 13h
Replying to @realDonaldTrump @OANN and @ChanelRion



3 4 58



Joe Gillard @JoeGillard · 13h
Replying to @realDonaldTrump @OANN and @ChanelRion



9 1 66



Johnny Unite US @2_mke · 13h
Replying to @realDonaldTrump @OANN and @ChanelRion



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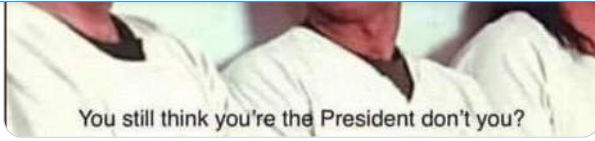
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- Misha**
21K Tweets
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- Ozil**
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DISTRICT COURT, DENVER COUNTY, COLORADO 1437 Bannock Street, Room 256 Denver, Colorado 80202	SERVED ONLY: July 23, 2021 5:26 PM FILING ID: 6EBDF31F970BA CASE NUMBER: 2020CV34319
Plaintiff: ERIC COOMER, Ph.D. v. Defendants: DONALD J. TRUMP FOR PRESIDENT, INC., ET. AL	▲ COURT USE ONLY ▲
<i>Attorneys for Donald J. Trump for President, Inc.:</i> John S. Zakhem, #30089 Eric R. Holway, #49263 Beth Chambers, #53474 Jackson Kelly PLLC 1099 18 th Street, Suite 2150 Denver, Colorado 80202 Telephone: 303.390.0003 Facsimile: 303.390.0177 jszakhem@jacksonkelly.com eric.holway@jacksonkelly.com	Case No.: 2020CV34319 Courtroom: 409
<p style="text-align: center;">DONALD J. TRUMP FOR PRESIDENT, INC.’S RESPONSES TO PLAINTIFF’S REQUESTS FOR PRODUCTION RELATING TO SPECIAL MOTION TO DISMISS</p>	

Petitioner, Donald J. Trump for President, Inc. (“The Campaign”), by and through its legal counsel, John S. Zakhem, Eric R. Holway, Beth Chambers, and the law firm of Jackson Kelly PLLC, hereby submits the following Response to Plaintiff’s Requests for Production Relating to Special Motion to Dismiss.

RESPONSES TO REQUESTS FOR PRODUCTION



1. All communications (including email and text messages) about Dr. Coomer and/or Dominion Voting Systems between you and:

- a. Any other Defendant – No responsive documents.
- b. Ron Watkins (including any aliases) – No responsive documents.
- c. Ali Alexander – No responsive documents.
- d. Fox News Network, LLC – No responsive documents.
- e. Patrick Byrne – No responsive documents.
- f. Christina Bobb – No responsive documents.
- g. Mike Lindell – No responsive documents.

The foregoing request is limited in time from January 2020 to the present with an obligation to update should additional materials be discovered.

Response to Request for Production No. 1:

The Campaign objects to this request to the extent it seeks documents which are privileged and protected from disclosure by the attorney client privilege, the work product doctrine, and the joint defense/common use privilege.

2. All broadcasts and publications of Donald J. Trump for President, Inc. containing any statements regarding Dr. Coomer.

Response to Request for Production No. 2:

No responsive documents.

3. All evidence of any retractions you have made with respect to statements regarding Dr. Coomer.

Response to Request for Production No. 3:

No responsive documents.

4. All documents reflecting any investigation you made regarding the allegations about Dr. Coomer made by Joseph Oltmann.

Response to Request for Production No. 4:

Without waiving the below objections, see the attached responsive documents which are bates numbered TC-0000001-32, which are the documents responsive to this request. The Campaign incorporates the objections raised in, “Donald J. Trump for President, Inc.’s Objections to Plaintiff’s Limited Discovery” filed on June 25, 2021. The Campaign further objects to this request to the extent it seeks documents which are privileged and protected from disclosure by the attorney client privilege, the work product doctrine, and the joint defense/common use privilege.

Respectfully submitted this 23rd day of July, 2021.

JACKSON KELLY PLLC

/s/ John S. Zakhem _____

John S. Zakhem, Esq. #30089

Eric R. Holway, Esq. #49263

Beth Chambers, Esq. #53474

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 23rd day of June, 2021, a true and correct copy of the foregoing was served via Colorado Court's E-filing System to all counsel of record.

/s/ Angela Maher _____
Angela Maher

DISTRICT COURT, DENVER COUNTY, COLORADO 1437 Bannock Street, Room 256 Denver, Colorado 80202		SERVED ONLY: August 4, 2021 4:40 PM FILING ID: D05120CD14022 CASE NUMBER: 2020CV34319
Plaintiff: ERIC COOMER, Ph.D. v. Defendants: DONALD J. TRUMP FOR PRESIDENT, INC., ET. AL		▲ COURT USE ONLY ▲
<i>Attorneys for Donald J. Trump for President, Inc.:</i> John S. Zakhem, #30089 Eric R. Holway, #49263 Beth Chambers, #53474 Jackson Kelly PLLC 1099 18 th Street, Suite 2150 Denver, Colorado 80202 Telephone: 303.390.0003 Facsimile: 303.390.0177 jszakhem@jacksonkelly.com eric.holway@jacksonkelly.com		Case No.: 2020CV34319 Courtroom: 409
DONALD J. TRUMP FOR PRESIDENT, INC.'S PRIVILEGE LOG		

Defendant, Donald J. Trump for President, Inc., by and through its legal counsel, Jackson Kelly PLLC, hereby submits its Privilege Log which is attached hereto as Exhibit A.

Respectfully submitted this 4th day of August, 2021.

JACKSON KELLY PLLC

/s/ John S. Zakhem

John S. Zakhem, Esq.

Eric R. Holway, Esq.

Beth Chambers, Esq.



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 4th day of August, 2021, a true and correct copy of the foregoing was served via Colorado Court's E-filing System to all counsel of record.

/s/ Angela Maher _____
Angela Maher

Eric Coomer, Ph.D., v. Donald J. Trump for President, Inc., et al.
Case Number 2020CV34319
Defendant Donald J. Trump for President, Inc.'s Privilege Log
August 4, 2021

Log Number	Date	From	To	CC	Document Type	Privilege Basis	Priv Log Description
Log-0001	1/11/2021	David C. Tobin [dctobin@tobinoconnor.com]	Alex Cannon [acannon@donaldtrump.com]		Email	Attorney Client	Email chain between Counsel reflecting legal advice regarding Eric Coomer litigation.
Log-0002	1/11/2021				PDF Document	Attorney Client; Work Product	Document sent between Counsel regarding Eric Coomer litigation.
Log-0003	11/13/2020	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]	Rudy Giuliani [giuliani.andrew@gmail.com]; Maria Ryan [Maria.Ryan@giulianipartners.com]; Justin Clark [jclark@donaldtrump.com]		Email	Work Product	Email between Trump Campaign representative(s) and Counsel providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0004	11/17/2020	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]	Justin Clark [jclark@donaldtrump.com]; Rudy Giuliani [giuliani.andrew@gmail.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representative(s) and Counsel providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0005	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0006	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.

Eric Coomer, Ph.D., v. Donald J. Trump for President, Inc., et al.
Case Number 2020CV34319
Defendant Donald J. Trump for President, Inc.'s Privilege Log
August 4, 2021

Log-0007	11/17/2020				Text File Document	Attorney Client; Work Product	Document providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0008	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0009	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0010	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0011	11/17/2020				Text File Document	Attorney Client; Work Product	Document providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0012	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.

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Log-0013	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0014	11/17/2020				Image File Document	Attorney Client; Work Product	Document providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0015	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0016	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0017	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0018	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.

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Log-0019	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0020	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0021	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0022	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0023	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0024	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.

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Log-0025	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0026	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0027	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0028	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0029	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0030	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.

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Log-0031	11/20/2020	bepshteyn@donaldtrump.com	Pete Marocco [pete.marocco@gmail.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0032	11/20/2020	bepshteyn@donaldtrump.com	Pete Marocco [pete.marocco@gmail.com]; Matthew Stroia [matthew.stroia@gmail.com]	Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.

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Log-0033	11/20/2020	bepshteyn@donaldtrum p.com	Pete Marocco [pete.marocco@gmail.c om]	Matthew Stroia [matthew.stroia@gma il.com];Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw. us];Jeffrey Barrack [jbarrack@barrack.co m];Mike Roman [mroman@donaldtru mp.com];Chip Borman [chipborman@yahoo.c om]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0034	11/20/2020	Boris Epshteyn [/O=EXCHANGELABS/OU =EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN =RECIPIENTS/CN=194B0 75358B644E2B336436D 72062E19-BEPSHTEYN]	Pete Marocco [pete.marocco@gmail.c om]	Matthew Stroia [matthew.stroia@gma il.com];Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw. us];Jeffrey Barrack [jbarrack@barrack.co m];Mike Roman [mroman@donaldtru mp.com];Chip Borman [chipborman@yahoo.c om]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.

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Log-0035	11/20/2020	Boris Epshteyn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=194B075358B644E2B336436D72062E19-BEPSHTEYN]	Pete Marocco [pete.marocco@gmail.com]; Matthew Stroia [matthew.stroia@gmail.com]	Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0036	11/20/2020	Boris Epshteyn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=194B075358B644E2B336436D72062E19-BEPSHTEYN]	Pete Marocco [pete.marocco@gmail.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0037	11/20/2020	Mike Roman [mroman@donaldtrump.com]	Boris Epshteyn [bepshteyn@donaldtrump.com]; Pete Marocco [pete.marocco@gmail.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Chip Borman [chipborman@yahoo.com]	Email	Attorney Client; Work Product	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.

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Log-0038	11/20/2020	Pete Marocco [pete.marocco@gmail.com]	Mike Roman [mroman@donaldtrump.com]	Boris Epshteyn [bepshteyn@donaldtrump.com]; Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Chip Borman [chipborman@yahoo.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0039	11/20/2020	Pete Marocco [pete.marocco@gmail.com]	Bruce Marks [marks@mslegal.com]	Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]; Boris Epshteyn [bepshteyn@donaldtrump.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.

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Case Number 2020CV34319

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August 4, 2021

Log-0040	11/19/2020	Pete Marocco [pete.marocco@gmail.com]	Bruce Marks [marks@mslegal.com]	Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]; Boris Epshteyn [bepshteyn@donaldtrump.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0041	11/20/2020	Pete Marocco [pete.marocco@gmail.com]	Boris Epshteyn [bepshteyn@donaldtrump.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0042	11/19/2020	Jenna Ellis [jenna.ellis.esq@gmail.com]	Jason Miller [jmiller@donaldtrump.com]; Tim Murtaugh [tmurtaugh@donaldtrump.com]		Email	Attorney Client; Work Product	Email between counsel and Trump Campaign representative(s) providing legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.

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August 4, 2021

Log-0043	11/20/2020	Boris Epshteyn [bepshteyn@donaldtrump.com]	Pete Marocco [pete.marocco@gmail.com]; Matthew Stroia [matthew.stroia@gmail.com]	Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Work Product	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0044	11/20/2020	Boris Epshteyn [bepshteyn@donaldtrump.com]	Pete Marocco [pete.marocco@gmail.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Work Product	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.

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Log-0045	11/20/2020	Boris Epshteyn [bepshteyn@donaldtrump.com]	Pete Marocco [pete.marocco@gmail.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Work Product	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0046	11/20/2020	Mike Roman [mroman@donaldtrump.com]	Boris Epshteyn [bepshteyn@donaldtrump.com]; Pete Marocco [pete.marocco@gmail.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Chip Borman [chipborman@yahoo.com]	Email	Work Product	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0047	11/20/2020	Mike Roman [mroman@donaldtrump.com]	Boris Epshteyn [bepshteyn@donaldtrump.com]; Pete Marocco [pete.marocco@gmail.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Chip Borman [chipborman@yahoo.com]	Email	Work Product	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.

DISTRICT COURT, DENVER COUNTY, COLORADO 1437 Bannock Street, Room 256 Denver, Colorado 80202		SERVED ONLY: August 4, 2021 4:40 PM FILING ID: D05120CD14022 CASE NUMBER: 2020CV34319
Plaintiff: ERIC COOMER, Ph.D. v. Defendants: DONALD J. TRUMP FOR PRESIDENT, INC., ET. AL		▲ COURT USE ONLY ▲
<i>Attorneys for Donald J. Trump for President, Inc.:</i> John S. Zakhem, #30089 Eric R. Holway, #49263 Beth Chambers, #53474 Jackson Kelly PLLC 1099 18 th Street, Suite 2150 Denver, Colorado 80202 Telephone: 303.390.0003 Facsimile: 303.390.0177 jszakhem@jacksonkelly.com eric.holway@jacksonkelly.com		Case No.: 2020CV34319 Courtroom: 409
DONALD J. TRUMP FOR PRESIDENT, INC.'S PRIVILEGE LOG		

Defendant, Donald J. Trump for President, Inc., by and through its legal counsel, Jackson Kelly PLLC, hereby submits its Privilege Log which is attached hereto as Exhibit A.

Respectfully submitted this 4th day of August, 2021.

JACKSON KELLY PLLC

/s/ John S. Zakhem

John S. Zakhem, Esq.

Eric R. Holway, Esq.

Beth Chambers, Esq.



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 4th day of August, 2021, a true and correct copy of the foregoing was served via Colorado Court's E-filing System to all counsel of record.

/s/ Angela Maher _____
Angela Maher

Eric Coomer, Ph.D., v. Donald J. Trump for President, Inc., et al.
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August 4, 2021

Log Number	Date	From	To	CC	Document Type	Privilege Basis	Priv Log Description
Log-0001	1/11/2021	David C. Tobin [dctobin@tobinoconnor.com]	Alex Cannon [acannon@donaldtrump.com]		Email	Attorney Client	Email chain between Counsel reflecting legal advice regarding Eric Coomer litigation.
Log-0002	1/11/2021				PDF Document	Attorney Client; Work Product	Document sent between Counsel regarding Eric Coomer litigation.
Log-0003	11/13/2020	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]	Rudy Giuliani [giuliani.andrew@gmail.com]; Maria Ryan [Maria.Ryan@giulianipartners.com]; Justin Clark [jclark@donaldtrump.com]		Email	Work Product	Email between Trump Campaign representative(s) and Counsel providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0004	11/17/2020	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]	Justin Clark [jclark@donaldtrump.com]; Rudy Giuliani [giuliani.andrew@gmail.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representative(s) and Counsel providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0005	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0006	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.

EXHIBIT A

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Log-0007	11/17/2020				Text File Document	Attorney Client; Work Product	Document providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0008	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0009	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0010	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0011	11/17/2020				Text File Document	Attorney Client; Work Product	Document providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0012	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.

Eric Coomer, Ph.D., v. Donald J. Trump for President, Inc., et al.
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Log-0013	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0014	11/17/2020				Image File Document	Attorney Client; Work Product	Document providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0015	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0016	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0017	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0018	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.

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Log-0019	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0020	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0021	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0022	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0023	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0024	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.

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Log-0025	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0026	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0027	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0028	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0029	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.
Log-0030	11/17/2020	Cretella, Anne Marie [AnneMarie.Cretella@giulianipartners.com]	Zafonte, Jo Ann [JoAnn.Zafonte@giulianipartners.com]		Email	Attorney Client; Work Product	Email between Trump Campaign representatives providing information to facilitate the rendering of legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.

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August 4, 2021

Log-0031	11/20/2020	bepshteyn@donaldtrump.com	Pete Marocco [pete.marocco@gmail.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0032	11/20/2020	bepshteyn@donaldtrump.com	Pete Marocco [pete.marocco@gmail.com]; Matthew Stroia [matthew.stroia@gmail.com]	Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.

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Log-0033	11/20/2020	bepshteyn@donaldtrum p.com	Pete Marocco [pete.marocco@gmail.c om]	Matthew Stroia [matthew.stroia@gma il.com];Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw. us];Jeffrey Barrack [jbarrack@barrack.co m];Mike Roman [mroman@donaldtru mp.com];Chip Borman [chipborman@yahoo.c om]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0034	11/20/2020	Boris Epshteyn [/O=EXCHANGELABS/OU =EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN =RECIPIENTS/CN=194B0 75358B644E2B336436D 72062E19-BEPSHTEYN]	Pete Marocco [pete.marocco@gmail.c om]	Matthew Stroia [matthew.stroia@gma il.com];Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw. us];Jeffrey Barrack [jbarrack@barrack.co m];Mike Roman [mroman@donaldtru mp.com];Chip Borman [chipborman@yahoo.c om]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.

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Log-0035	11/20/2020	Boris Epshteyn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=194B075358B644E2B336436D72062E19-BEPSHTEYN]	Pete Marocco [pete.marocco@gmail.com]; Matthew Stroia [matthew.stroia@gmail.com]	Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0036	11/20/2020	Boris Epshteyn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=194B075358B644E2B336436D72062E19-BEPSHTEYN]	Pete Marocco [pete.marocco@gmail.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0037	11/20/2020	Mike Roman [mroman@donaldtrump.com]	Boris Epshteyn [bepshteyn@donaldtrump.com]; Pete Marocco [pete.marocco@gmail.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Chip Borman [chipborman@yahoo.com]	Email	Attorney Client; Work Product	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.

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Log-0038	11/20/2020	Pete Marocco [pete.marocco@gmail.com]	Mike Roman [mroman@donaldtrump.com]	Boris Epshteyn [bepshteyn@donaldtrump.com]; Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Chip Borman [chipborman@yahoo.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0039	11/20/2020	Pete Marocco [pete.marocco@gmail.com]	Bruce Marks [marks@mslegal.com]	Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]; Boris Epshteyn [bepshteyn@donaldtrump.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.

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Log-0040	11/19/2020	Pete Marocco [pete.marocco@gmail.com]	Bruce Marks [marks@mslegal.com]	Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]; Boris Epshteyn [bepshteyn@donaldtrump.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0041	11/20/2020	Pete Marocco [pete.marocco@gmail.com]	Boris Epshteyn [bepshteyn@donaldtrump.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Attorney Client	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0042	11/19/2020	Jenna Ellis [jenna.ellis.esq@gmail.com]	Jason Miller [jmiller@donaldtrump.com]; Tim Murtaugh [tmurtaugh@donaldtrump.com]		Email	Attorney Client; Work Product	Email between counsel and Trump Campaign representative(s) providing legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation and prepared in anticipation of litigation.

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Log-0043	11/20/2020	Boris Epshteyn [bepshteyn@donaldtrump.com]	Pete Marocco [pete.marocco@gmail.com]; Matthew Stroia [matthew.stroia@gmail.com]	Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Work Product	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0044	11/20/2020	Boris Epshteyn [bepshteyn@donaldtrump.com]	Pete Marocco [pete.marocco@gmail.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Work Product	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.

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Log-0045	11/20/2020	Boris Epshteyn [bepshteyn@donaldtrump.com]	Pete Marocco [pete.marocco@gmail.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Mike Roman [mroman@donaldtrump.com]; Chip Borman [chipborman@yahoo.com]	Email	Work Product	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0046	11/20/2020	Mike Roman [mroman@donaldtrump.com]	Boris Epshteyn [bepshteyn@donaldtrump.com]; Pete Marocco [pete.marocco@gmail.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Chip Borman [chipborman@yahoo.com]	Email	Work Product	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.
Log-0047	11/20/2020	Mike Roman [mroman@donaldtrump.com]	Boris Epshteyn [bepshteyn@donaldtrump.com]; Pete Marocco [pete.marocco@gmail.com]	Matthew Stroia [matthew.stroia@gmail.com]; Bruce Marks [marks@mslegal.com]; Jerome Marcus [jmarcus@marcuslaw.us]; Jeffrey Barrack [jbarrack@barrack.com]; Chip Borman [chipborman@yahoo.com]	Email	Work Product	Email chain between Counsel and Trump Campaign representatives reflecting legal advice regarding Dominion Voting Systems and 2020 presidential election results litigation.



<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO 1437 Bannock Street Denver, CO 80202</p>	<p>SERVED ONLY: July 9, 2021 6:33 PM FILING ID: EF5389CE95448 CASE NUMBER: 2020CV34319</p> <p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>ERIC COOMER, Ph.D., Plaintiff</p> <p>vs.</p> <p>DONALD J. TRUMP FOR PRESIDENT, INC., et al., Defendants</p>	
<p>Attorneys for Plaintiff Charles J. Cain, No. 51020 ccain@cstrial.com Steve Skarnulis, No. 21PHV6401 skarnulis@cstrial.com CAIN & SKARNULIS PLLC P. O. Box 1064 Salida, Colorado 81201 719-530-3011 Telephone 512-477-5011 Facsimile</p> <p>Thomas M. Rogers III, No. 28809 trey@rklawpc.com Mark Grueskin, No. 14621 mark@rklawpc.com Andrew E. Ho, No. 40381 andrew@rklawpc.com RECHTKORNFELD PC 1600 Stout Street, Suite 1400 Denver, Colorado 80202 303-573-1900 Telephone</p>	<p>Case Number: 2020cv034319</p> <p>Division Courtroom: 409</p>
<p style="text-align: center;">PLAINTIFF'S NOTICE OF INTENTION TO TAKE ORAL AND VIDEOTAPED DEPOSITION OF THE AUTHORIZED REPRESENTATIVE(S) OF DEFENDANT DONALD J. TRUMP FOR PRESIDENT, INC.</p>	

PLEASE TAKE NOTICE that counsel for Eric Coomer will take the oral deposition of **Donald J. Trump for President, Inc.** beginning at **2:00 p.m. (mdt) on August 9, 2021** pursuant to C.R.C.P. 30(b)(6), as well as the Court's June 8, 2021 Order Regarding Reconsideration of Plaintiff's Motions for Expedited Discovery to Aid in Responding to Defendants' Special Motions to Dismiss. **Donald J. Trump for President, Inc.** is directed to designate person(s) to testify on its behalf on the matters described in **Exhibit A** attached hereto.

The witness and all other persons will appear remotely utilizing the secure web-based deposition option afforded by Veritext Legal Solutions, or in the alternative, video conferencing (VTC) services offered by Veritext Legal Solutions to provide remote access for those parties wishing to participate in the deposition via the internet and/or telephone.

The foregoing deposition will be conducted before the following duly authorized court reporter: Veritext Legal Solutions. In addition, notice is provided that the court reporter also may be remote via one of the options above for the purposes of reporting the proceeding and may or may not be in the presence of the deponent(s).

Access information for the deposition will be provided prior to the date and time scheduled for the deposition. In addition, Plaintiff reserves the right to utilize instant visual display technology such that the court reporter's writing of the proceeding will be displayed simultaneous to their writing of same on a laptop, iPad, tablet, or other type of display device connected to the court reporter.

You are further advised that the deposition may be videotaped in accordance with C.R.C.P. 30.

Respectfully submitted this 9th day of July 2021.

 /s/ Charles J. Cain
Charles J. Cain, No. 51020

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Deposition Notice has been served on all parties receiving notice through ICCES on this 9th day of July 2021.

 /s/ Charles J. Cain
Charles J. Cain

EXHIBIT A

I. DEFINITIONS

1. “Dr. Coomer” refers to Eric Coomer, Plaintiff herein.
2. “You,” “your,” or “yourself” refers to Donald J. Trump for President, Inc., as well as any affiliated entities, subsidiaries, or parent companies and/or any and all current or former officers, directors, agents, servants, employees, predecessors, successors, assigns, sureties, attorneys, affiliates, or representatives acting for or on its behalf.
3. “Defendants” collectively refers to Defending the Republic; Donald J. Trump for President, Inc.; FEC United; Rudolph Giuliani; Herring Networks, Inc. dba One America News Network; James Hoft; Michelle Malkin; Eric Metaxas; Joseph Oltmann; Sidney Powell; Sidney Powell, P.C.; Chanel Rion; Shuffling Madness Media, Inc. dba Conservative Daily; and TGP Communications LLC dba The Gateway Pundit, as well as any affiliated entities, subsidiaries, or parent companies and/or any and all current or former officers, directors, agents, servants, employees, predecessors, successors, assigns, sureties, attorneys, affiliates, or representatives acting for or on their behalf. Individual reference to one Defendant named in this lawsuit refers specifically to that Defendant, as well as any affiliated entities, subsidiaries, or parent companies and/or any and all current or former officers, directors, agents, servants, employees, predecessors, successors, assigns, sureties, attorneys, affiliates, or representatives acting for or on their behalf.
4. “Allegations” refer to the statements or conduct that form the basis of the claims asserted in Plaintiff’s First Amended Complaint.
5. The relevant time period for the matters upon which examination is requested is from January 1, 2020 to the present.

II. MATTERS UPON WHICH EXAMINATION IS REQUESTED

1. All statements, broadcasts and publications made, authorized, or ratified by you containing any statements regarding Dr. Coomer or Dominion Voting Systems.¹
2. All statements, broadcasts and publications made on your behalf, if any, by Eric Trump, Rudolph Giuliani, and/or Sidney Powell regarding Dr. Coomer or Dominion Voting Systems.

¹ All references to Dominion Voting Systems are limited to and defined by the Court’s Discovery Order.

3. Eric Trump's role, if any, as your representative or agent, including any authorization of Eric Trump to make statements on your behalf or ratification of statements made by Eric Trump regarding Dr. Coomer or Dominion Voting Systems.
4. Rudolph Giuliani's role, if any, as your representative or agent, including any authorization of Rudolph Giuliani to make statements on your behalf or any ratification of statements made by Rudolph Giuliani regarding Dr. Coomer or Dominion Voting Systems.
5. Sidney Powell's role, if any, as your representative and agent, including any authorization of Sidney Powell to make statements on your behalf or any ratification of statements made by Sidney Powell regarding Dr. Coomer or Dominion Voting Systems.
6. Any knowledge of Dr. Coomer or Dominion Voting Systems obtained prior to or following your publication, authorization, or ratification of statements regarding Dr. Coomer and Dominion Voting Systems, including: what this knowledge was; when this knowledge was acquired; how this knowledge was acquired; and the basis of this knowledge.
7. Any investigation you conducted or directed into the Allegations about Dr. Coomer obtained prior to or following your publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems, including contacting Dr. Coomer or Dominion Voting Systems regarding the Allegations.
8. Any evidence supporting the truth of the Allegations about Dr. Coomer obtained prior to or following your publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.
9. Any evidence refuting the truth of the Allegations about Dr. Coomer obtained prior to or following your publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.
10. Any knowledge of or connection with Joseph Oltmann obtained prior to or following your publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.
11. Any agreement or communication between you and any other Defendant regarding Dr. Coomer or Dominion Voting Systems obtained prior to or following your publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.

12. Any fundraising based on or related to the statements, broadcasts and publications you made, authorized, or ratified regarding Dr. Coomer or Dominion Voting Systems, including solicitations for donations in support of legal challenges to the 2020 Presidential election results.
13. All communications (including email and text messages) about Dr. Coomer or Dominion Voting Systems between you and:
 - a. Any other Defendant
 - b. Ron Watkins (including any aliases)
 - c. Ali Alexander
 - d. Fox News Network, LLC
 - e. Patrick Byrne
 - f. Christina Bobb
 - g. Mike Lindell
14. Any retractions you have made with respect to statements regarding Dr. Coomer.
15. Internal communications between your staff members regarding Dr. Coomer or Dominion Voting Systems.
16. Your communications with Rudy Giuliani regarding the events leading up to and including the insurrection on January 6, 2021, including financial support for his activities immediately preceding or after the insurrection.
17. Your financial support, if any, for the January 6, 2021 Stop the Steal rally, including payments to Event Strategies, Inc., American Made Media Consultants LLC, or any Defendant in connection therewith.