

Name	Exhibit	Description
Eric Coomer	A	Declaration
	A-1	Defamation Spreadsheet
	A-2	Defamation Spreadsheet Links
Joseph Oltmann	B-1	08-11-21 Deposition Transcript and Exhibits ¹
	B-2	09-08-21 Deposition Transcript and Exhibits
		PX 103 FEC United emails
		PX 104 11-24-20 text to Jim Hoft
		PX 105 08-02-21 Oltmann Telegram post re connected to Ron Watkins
		PX 106 03-26-21 Halderman analysis of Antrim County Election Incident
		PX 107 November 2020 Michigan Oversight Committee Report
		PX 108 Oltmann research re Coomer ²
		PX 109 November 2020 emails re Lyons
		PX 110 11-06-20 Coomer Facebook post re vote
		PX 111 11-12-20 CISA Statement
		PX 131 Joseph A. Camp posting
	B-3	11-09-20 Video of Conservative Daily Podcast
	B-4	11-09-20 Transcript of Conservative Daily Podcast
B-5	09-26-20 Oltmann Google Search Results; 20CV3419-JOdisclosures-0199	
B-6	12-28-20 Conservative Daily Podcast	
B-7	10-12-20 CO Times Recorder: Conservative Group Behind Deadly “Patriot Muster” Rally Working Closely With Colorado GOP	
B-8	09-09-20 Conservative Daily Podcast	
B-9	08-05-20 Conservative Daily Podcast	
B-10	11-05-20 Conservative Daily Podcast	
B-11	11-06-20 Conservative Daily Podcast	
B-12	12-05-20 Oltmann Parler post	
FEC United (Stuart Butler)	C-1	08-11-21 Deposition Transcript and Exhibits PX 89 Deposition Notice of FEC United PX 90 Notes from FEC rep regarding deposition topics
	C-2	09-09-21 Deposition Transcript and Exhibits PX 112 Deposition notice for FEC United PX 113 DE Secretary of State information re FEC United PX 114 0265_fecunited_Donald J Trump for President email search results PX 115 Photo of broken phone

¹ Deposition exhibits include only those marked by Plaintiff.

² Deposition Exhibit 108 is duplicative of Deposition Exhibit 137 below and is filed as suppressed as it contains confidential personal information.

Name	Exhibit	Description
Shuffling Madness Media/CD Solutions (Gregory Pappas)	D-1	08-11-21 Deposition Transcript and Exhibits PX 91 Deposition Notice of Shuffling Madness Media, Inc. dba Conservative Daily PX 92 CO Secretary of State Filing; Statement of Trade Name for Reporting Entity PX 93 CO Secretary of State Filing; Statement of Trade Name Withdrawal
Shuffling Madness Media (Joseph Oltmann)	D-2	09-09-21 Deposition Transcript and Exhibits PX 116 Deposition notice for Shuffling Madness Media, Inc. PX 117 DE Secretary of State information re Shuffling Madness Media PX 118 Joe Otto LinkedIn PX 119 Conservative Daily home page PX 120 12-23-20 Conservative Daily donate PX 121 03-23-18 Conservative Daily archives PX 122 11-06-20 Conservative Daily: Democrats Just Stole Another State from Trump! PX 123 12-30-20 Conservative Daily: Breaking We Have Enough Votes to Challenge Biden's Win! PX 124 Advocacy to Action home page PX 125 datalead Max Mcquire profile PX 127 07-05-14 Conservative Daily Facebook post PX 128 Max McGuire LinkedIn PX 129 09-08-14 Conservative Daily webpage: Advocacy to Action PX 132 09-08-14 Conservative Daily webpage: Advocacy to Action PX 133 03-23-18 Conservative Daily webpage
CD Solutions (Joseph Oltmann)	D-3	09-09-21 Deposition Transcript and Exhibits PX 134 11-09-20 video clip from Conservative Daily podcast PX 135 11-09-20 video clip from Conservative Daily podcast PX 136 11-30-20 video clip from Conservative Daily podcast
	D-4	Conservative Daily Screenshots with ratings
	D-5	01-05-21 Email from theresearcher2020@yandex.com to info@conservative-daily.com
	D-6	PX 137 Oltmann research re Coomer ³

³ Deposition Exhibit 137 is filed as suppressed as it contains confidential personal information.

Name	Exhibit	Description
James Hoft/TGP Communications dba The Gateway Pundit	E-1	08-10-21 Deposition Transcript and Exhibits PX 75 06-10-20 text correspondence between Joseph Oltmann and James Hoft PX 76 11-13-20 text from Jenny Beth Martin introducing James Hoft to Randy Corporon PX 77 Text message: text you privately re Dominion PX 78 11-24-20 text from James Hoft to Joseph Oltmann PX 79 12-23-20 text from Joseph Oltmann to James Hoft PX 80 Text message btwn Hoft & Oltmann: has anyone seen Coomer? PX 81 Text message: introduction of Corporon and Hoft PX 82 11-15-20 text from Randy Corporon to James Hoft PX 83 11-16-20 text from James Hoft to Randy Corporon PX 84 11-16-20 text from Randy Corporon to James Hoft PX 85 11-24-20 text from Joseph Oltmann to James Hoft PX 86 11-13-20 article by Jim Hoft: "Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipulate the Vote" PX 87 TGP News Article: Report: Anti-Trump Dominion Voting Systems Security Chief Was Participating in Antifa Calls, Posted Antifa Manifesto Letter to Trump Online PX 88 TGP News Article: Georgia Secretary of State Brad Raffensperger's Update to Georgia's Voting Machine Software Right Before the 2020 Election Was Unlawful and Violates Any Certification of State Results
	E-2	11-15-20 TGP Article: It's Massive, Criminal Voter Fraud!
	E-3	11-16-20 TGP Article: Denver Business Owner: Dominion's Eric Coomer Is an Unhinged Sociopath — His Internet Profile Is Being Deleted and Erased
	E-3a	11-16-20 TGP Article: Denver Business Owner: Dominion's Eric Coomer Is an Unhinged Sociopath — His Internet Profile Is Being Deleted and Erased (AUDIO)
	E-4	11-23-20 TGP Article: BREAKING: SECOND VIDEO REVEALED of Dominion Voting System's Eric Coomer Explaining to Elections Officials How to Switch Votes
	E-5	11-24-20 TGP Article: NEW ERIC COOMER VIDEO UNCOVERED: Admits in 2015 Dominion Machines DO NOT Have Ability to Root Out Fraudulent Ballots
	E-6	11-24-20 TGP Article: CONFIRMED: Georgia Secretary of State Brad Raffensperger Used Dominion's Eric Coomer as Witness for the State to Defend LAST MINUTE COMPUTER CHANGES
	E-7	11-26-20 TGP Article: Not Only Was Dominion Prone to Attack from China and Iran – It Was Also Connected to Pro-Obama Entity Known as ACORN
	E-8	11-27-20 Article: BALD-FACED LIES: Dominion Says Assertions of Vote Switching Are "Completely False" —But We Have Two Videos of Dominion Executive Eric Coomer Showing How to Switch Votes
	E-9	12-17-20 TGP Article: More On Dominion Voting Machines: They Could Easily Duplicate Votes and Security Threats Were Virtually Ignored
E-10	12-27-20 TGP Article: Developing: Dominion's Anti-Trump Executive Eric Coomer Owns Patents on Adjudication Process That Investigators Found Skimmed Votes from Trump in Michigan	

Name	Exhibit	Description
	E-11	12-28-20 TGP Article: WAKE UP AMERICA! Bold Billionaire Offers \$1 Million Bounty for Dominion’s, Eric Coomer’s Comeuppance
	E-12	02-22-21 TGP Article: WE CAUGHT THEM: Matt Crane, Critic of TGP’s Article on Obvious Questions of the 2020 Election Results in Colorado, Was Not Forthright – Turns Out His Wife Worked for Dominion and Sequoia for Over a Decade
	E-13	08-02-21 TGP Article: What a Piece of Work – We Caught Him Again: Self-Described Colorado ‘Republican’ Matt Crane Caught at Dominion Party with Democrat Leaders and Eric Coomer
	E-14	08-03-21 TGP Article: The Election Group’s Jennifer Morrell Sided with Corrupt Arizona Secretary of State After the Election but Then Later Took Down He Tweet, THE GATEWAY PUNDIT
	E-15	10-24-20 New York Times Article: How the Epoch Times Created a Giant Influence Machine
	E-16	12-28-20 The Detroit News Article: Dominion tells Mellissa Carone to cease ‘defamatory claims’
	E-17	10-31-20 TGP Article: ROGER STONE EXCLUSIVE: How the Democrats Plan to Steal the 2020 Election
	E-18	10-23-20 TGP Article: 2020 Election Prediction: Despite Massive Headwinds and Democrat Attempts to Steal Election, President Trump Will Win in Larger Landslide than 2016
	E-19	10-18-20 TGP Article: 4Chan Users Claim to Have Found Way to Easily Change People’s Voter Registration and Cancel Ballots Online in Oregon and Washington
	E-20	10-17-20 TGP Article: ELECTION FRAUD: Pennsylvania Rejects 334,000 Duplicate Ballots Already; Kentucky Reports Bins of Ballots Discarded
Michelle Malkin	F-1	07-27-21 Deposition Transcript and Exhibits PX 15 11-13-20 live-stream interview of Joe Oltmann by Michelle Malkin PX 16 11-13-20 Dominion Voting Systems webpage: Setting the Record Straight: Facts & Rumors PX 17 11-28-20 Newsmax broadcast of Sovereign Nation with Michelle Malkin PX 18 11-25-20 Dominion Voting Systems webpage; Setting the Record Straight: Facts & Rumors PX 19 11-13-20 Michelle Malkin tweet re “Joe Oltmann (now banned on Twitter)” PX 20 11-13-20 Michelle Malkin tweet of full Joe Oltmann interview PX 21 11-13-20 Michelle Malkin Twitter reply “What are they trying to hide?” PX 22 11-15-20 Michelle Malkin tweet re “Dominion, Antifa & #Eric Coomer,” etc. PX 23 11-16-20 Michelle Malkin tweet re Denver Business Owner: Dominion’s Eric Coomer is an Unhinged Sociopath, etc. PX 24 11-19-20 Michelle Malkin repost of Joe Oltmann interview PX 25 Series of Signal text messages between Randy Corporon and Michelle Malkin PX 26 11-25-20 email from Michelle Malkin to Pierce Sargeant re Sovereign Nation - Wednesday pretape - guest/contact info PX 27 State of Colorado Uniform Voting Submission PX 28 Affidavit of Joseph Oltmann

Name	Exhibit	Description
		PX 30 Newsmax retraction of Coomer coverage
	F-2	PX 29 Oltmann notes re antifa call ⁴
	F-3	11-13-20 #MalkinLive Transcript
	F-4	11-13-20 Malkin tweet
	F-5	09-30-20 Rasmussen Reports: Political Commentary by Michelle Malkin: Who's Funding Shady Ballot Harvesting Schemes?
	F-6	12-18-19 Rasmussen Reports: Political Commentary by Michelle Malkin: Out of the Shadows... and Into the Voting Booth?
Eric Metaxas	G-1	08-13-21 Deposition Transcript and Exhibits PX 94 11-24-20 email chain between Albin Sadar, Susan Pausky, Eric Metaxas, Joe Oltmann PX 95 11-25-20 email between Pausky, Metaxas, Sadar (show producer), and Oltmann "Bless entire team! You are rocking it" PX96 The Eric Metaxas Radio Show: Joe Oltmann Discusses How a Security Genius at Dominion Voting Promised Antifa Members a Trump Loss PX 97 11-24-20 transcript of Eric Metaxas Show podcast G-2 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video G-3 11-24-20 Metaxas tweet G-4 01-04-21 Metaxas tweet G-5 11-07-20 Metaxas tweet G-6 11-25-20 The Eric Metaxas Show: Businessman Joe Oltmann continues revealing his inside information of how Eric Coomer, a security genius for Dominion voting systems, assured Antifa members that Trump would never win re-election G-7 12-03-20 The Eric Metaxas Show: Kevin McCullough has late-breaking news about the ownership of Dominion voting machines, plus, shares an update of where the swing states are with correcting huge ballot discrepancies G-8 12-21-20 The Eric Metaxas Show: Steve Bannon from Sunday night's "prayer call"; Steve brings us up to speed with the president's path to victory and deals directly with those two explosive words, "Martial Law." G-9 05-11-20 The Eric Metaxas Show: Attorney Jenna Ellis—On Democrats Changing Election Laws for the 2020 Election
Chanel Rion	H-1	08-09-21 Deposition Transcript and Exhibits PX 56 08-2019: DEF CON 27 Voting Machine Hacking Village Report PX 57 Screenshot of Professor Halderman from OAN's "Dominion-izing the Vote" piece PX 58 11-16-20 Scientists say no credible evidence of computer fraud in the 2020 election outcome, but policymakers must work with experts to improve confidence PX 59 Screenshot of Ron Watkins PX 60 Series of tweets by Ron@CodeMonkeyZ PX 61 11-17-20 Dominion Voting Systems webpage: Setting the Record Straight: Facts & Rumors

⁴ Deposition Exhibit 29 is filed as suppressed as it contains information protected from public disclosure pursuant to this Court's Protective Order entered July 19, 2021.

Name	Exhibit	Description
	H-2	11-17-20 Rion tweet
	H-3	11-29-21 Top Dominion Exec: Trump Is Not Going to Win. I Made F**ing Sure of That, Nov. 29, 2020, YOUTUBE
Charles Peter Herring/Herring Networks, Inc. dba One America News Network	I-1	07-30-21 Deposition Transcript and Exhibits PX 31 Declaration of Charles Herring in Support of Motion to Dismiss Pursuant to Colorado’s anti-SLAPP statute, Colo. Rev. Stat. § 13-20-110 PX 32 OAN “Dominion-izing the Vote” video PX 33 11-16-20 Chanel Rion tweet quoting Ron@CodeMonkeyZ PX 34 11-10-20 email from Joe Oltmann to contact re One America News Network Contact form PX 35 11-10-20 email from Joe Oltmann to Taylor Scott re Voter Fraud Follow Up PX 36 11-15-20 email from Charles Herring to Chanel Rion, Christina Bobb re Eric Coomer PX 37 11-15-20 email from Joe Oltmann to Chanel Rion re Responding to your LinkedInMessage PX 38 11-15-20 email from Joe Oltmann to Chanel Rion re Voter Fraud Follow Up PX 39 11-16-20 email from Charles Herring to Kara McKinney, Alexander Salvi, Da Ball, Stephanie Hamill re Who is Eric Coomer? Potentially the “smoking gun” at Dominion for 2020 Voter Rigging PX 40 11-16-20 email from Chanel Rion to Joe Oltmann re email 5 capture 1-10 please confirm receipt PX 41 12-22-20 text message from C Herring to ?? re can we counter sue Coomer PX 42 02-01-21 email chain between C Bobb, C Herring and C Rion regarding Coomer document PX 43 Text messages between Rudy Giuliani and Charles Herring PX 44 03-11-21 text between Charles Herring and Christina Bobb PX 45 05-03-21 email chain regarding Newsmax retraction and boycott of Newsmax PX 46 Joe Oltmann Parler post re Eric Coomer
	I-2	09-03-20 OAN Newsroom Article: Several States Investigating Accounts Of Mail-In Voter Fraud
	I-3	09-19-20 OAN Newsroom Article: President Trump Slams Mail-In Voting As A ‘Scam,’ Says It Will Be ‘A Disaster’
	I-4	09-27-20 OAN Newsroom Article: AG Barr: Mail-In Ballots Enable Fraud, Voter Coercion
Rudolph Giuliani	J-1	08-14-21 Deposition Transcript and Exhibits PX 98 04-29-21 declaration of Rudolph Giuliani in support of anti-SLAPP motion to dismiss PX 99 06-25-21 Giuliani Objections to Plaintiff’s Requests for Production Relating to Special Motion to Dismiss PX 100 Press conference photo PX 101 11-19-20 video clip from press conference re cheating PX 102 06-07-21 Jan Wolfe tweet: newly disclosed emails shows OAN reporter was working for Giuliani

Name	Exhibit	Description
	J-2	11-15-20 Maria Bartiromo and Giuliani interview video
	J-3	11-17-20 Tennessee Star News Article: Trump Lawyers Powell and Giuliani Claim 'Massive' Vote Rigging by Dominion, Allege Company Link to Antifa
	J-4	11-12-20 Lou Dobs and Giuliani interview video
Sidney Powell/Sidney Powell, P.C.	K-1	07-20-21 Deposition Transcript and Exhibits PX 1 McLaughlin-Malkin text message PX 2 Affidavit of Joseph Oltmann PX 3 11-19-20 transcript of news conference PX 4 11-20-20 video clip from Howie Carr show PX 5 11-20-20 video clip from Maria Bartiromo interview of Powell on Fox News PX 6 Trump tweet: legal team PX 7 11-22-20 Politico article "Trump Campaign Cuts Sidney Powell from President's Legal Team" PX 8 01-22-21 text message from Powell regarding Restore the Republic PAC PX 9 Powell tweet: adjudication PX 10 07-13-21 privilege log PX 11 04-01-20 Powell tweet: adjudication PX 12 Video "Eric Coomer Explains How to Alter Votes in the Dominion System" PX 13 06-02-21 Powell tweet: contradictions PX 14 12-23-20 video: Coomer contradictions by defendingtherepublic.org
	K-2	11-19-20 Powell video clip from press conference
	K-3	02-01-21 Above the Law Article: RNC Chair Has Regrets About Letting Rudy Giuliani and Sidney Powell Spew Legal Word Vomit at Her HQ
	K-4	11-20-20 Howie Carr Show with Sidney Powell
	K-5	11-26-20 Defending the Republic solicitation webpage
	K-6	11-07-20 FOX Business: Lou Dobbs, Sidney Powell: Trump has to fight for election integrity
	K-7	Sidney Powell, Licensed to Lie (2nd ed. 2018) (citation only)
	K-8	12-08-20 New York Times Article: What We Know About Sidney Powell, the Lawyer Behind Wild Voting Conspiracy Theories
Defending the Republic	L-1	08-04-21 Deposition Transcript and Exhibits PX 47 07-12-21 deposition notice PX 48 11-14-20 Fox News: Sidney Powell PX 49 07-09-21 Responses to Plaintiff's Limited Discovery Requests PX 50 Media posts re various lawsuits PX 51 11-14-20 Lou Dobbs: Interview with Sidney Powell; Dominion Denies Claims About Software Issues; Multiple Reports Seem to Show Otherwise PX 52 08-03-21 Texas Secretary of State information re Defending the Republic PX 53 11-25-20 Pearson vs. Kemp; GA complaint PX 54 12-02-20 Bower v Ducey; AZ complaint PX 55 Links re videos & posting on DTR website
	L-2	11-10-20 Lou Dobbs tweet

Name	Exhibit	Description
Donald J. Trump for President, Inc.	M-1	08-09-21 Deposition Transcript and Exhibits
		PX 62 07-19-20 Fox News Sunday article re Chris Wallace interview with Donald Trump
		PX 63 11-04-20 Video: Trump Frankly We Did Win This Election
		PX 64 11-04-20 Trump tweet: We are up BIG, but they are trying to STEAL the Election
		PX 65 11-07-20 Video: Giuliani Four Seasons Landscaping Press Conference
		PX 66 11-12-20 Trump tweet: Dominion deleted 2.7 million Trump votes
		PX 67 11-12-20 CISA Joint Statement
		PX 68 11-14-20 Trump campaign memo
		PX 69 11-17-20 Eric Trump tweet re Coomer
		PX 70 11-21-20 Trump tweet: Dominion-izing the Vote Part Two
		PX 71 Trump retweet: Dominion-izing the Vote
		PX 72 07-23-21 DJTFP response to Plaintiff's requests for production relating to special motion to dismiss
		PX 73 08-04-21 DJTFP privilege log
PX 74 07-09-21 DJTFP deposition notice		
M-2	08-13-21 Deposition Transcript	
M-3	11-14-20 Trump tweet	
M-4	11-18-20 Trump tweet	
M-5	11-19-20 Trump tweet	
M-6	11-21-20 Trump tweets	
M-7	01-31-21 New York Times Article: 77 Days: Trump's Campaign to Subvert the Election	
M-8	11-08-20 Trump tweet	
Frederick W. Brown, Jr.	N	Declaration
	N-1	Curriculum Vitae
J. Alex Halderman	O	Declaration
	O-1	Curriculum Vitae
	O-2	Declaration of Ronald Watkins, filed Dec. 02, 2020, Civil Action No. 2:20-cv-023221-DJH; <i>Bowyer, et al. v Ducey, et al.</i> ; In the United States District Court for the District of Arizona [Dkt. 1-6]
	O-3	Declaration of Ronald Watkins, filed Nov. 25, 202, Civil Action No. 2:20-cv-13134-LVP-RSW; <i>King, et al. v. Whitmer, et al.</i> ; In the United States District Court for the Eastern District of Michigan [Dkt. 1-16]
	O-4	Declaration of Ronald Watkins, filed Dec. 1, 2020, Case No. 2:20-cv-1771; <i>Feehan, et al. v. Wisconsin Elections Commission, et al.</i> ; In the United States District Court for the Eastern District of Wisconsin
Mike Rothschild	P	Declaration
Individual 3	Q	Declaration
		EX 1 11-13-20 Affidavit of Joseph Oltmann
		EX 2 10-19-20 Emails from Joe Oltmann to Individual 3

Name	Exhibit	Description
Marty Golingan	R	Declaration
		EX A 11-09-20 email from Lindsay Oakley to OANN Producers re Reminder!!!
		EX B 01-06-21 email from Lindsay Oakley to OANN Producers re Capitol Hill News
		EX C 01-14-21 email from Lindsay Oakley to OANN Producers re Notes from Meeting
		EX D 02-11-21 OANN Contact Form
		EX E 03-01-21 email from Lindsay Oakley to OANN Producers re "former president trump"
	S	INTENTIONALLY LEFT BLANK
Individual 4	T	Declaration ⁵
Individual 1	U	Declaration ⁶
Charles J. Cain	V	Declaration
	V-1	08-18-21 Demand for Retraction
	V-2	06-24-21 New York Bar Association Opinion re Giuliani
	V-3	08-11-21 Memorandum Opinion issued in proceedings pending before the United States District Court for the District of Columbia, styled <i>US Dominion, Inc., et al v. Sidney Powell, et al.</i> ; Civil Action No. 1:21-cv-00040; <i>US Dominion, Inc., et al v. Rudolph W. Giuliani, et al.</i> ; Civil Action No. 1:21-cv-00213; and <i>US Dominion, Inc., et al v. My Pillow, Inc., et al.</i> ; Civil Action No. 1:21-cv-00445
	V-4	08-25-21 Opinion and Order issued in a proceeding pending before the United States District Court for the Eastern District of Michigan, Southern Division, styled <i>Timothy King et al. vs. Gretchen Whitmer, et al. and City of Detroit, et al.</i> ; Civil Case No. 20 13134
	V-5	07-07-21 Hearing Transcript
Doug Bania	W	Declaration
	W-1	07-02-21 Advance Democracy, Inc. Reports: Threats Against Eric Coomer on Twitter

⁵ This Declaration is filed as suppressed as it contains information protected from public disclosure pursuant to this Court's Protective Order entered July 19, 2021.

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