

<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>
<p><b>Attorneys for Plaintiff</b>          Charles J. Cain, No. 51020  <a href="mailto:ccain@cstrial.com">ccain@cstrial.com</a>          Steve Skarnulis, No. 21PHV6401  <a href="mailto:skarnulis@cstrial.com">skarnulis@cstrial.com</a>          Bradley A. Kloewer, No. 50565  <a href="mailto:bkloewer@cstrial.com">bkloewer@cstrial.com</a>          Zachary H. Bowman, No. 21PHV6676  <a href="mailto:zbowman@cstrial.com">zbowman@cstrial.com</a>  <b>CAIN &amp; SKARNULIS PLLC</b>          P. O. Box 1064          Salida, Colorado 81201          719-530-3011/512-477-5011 (Fax)</p> <p>Thomas M. Rogers III, No. 28809  <a href="mailto:trey@rklawpc.com">trey@rklawpc.com</a>          Mark Grueskin, No. 14621  <a href="mailto:mark@rklawpc.com">mark@rklawpc.com</a>          Andrew E. Ho, No. 40381  <a href="mailto:andrew@rklawpc.com">andrew@rklawpc.com</a>          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 style="text-align: center;"><b>EXHIBIT C-1</b></p>	

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

3 ^ COURT USE ONLY ^

4 ERIC COOMER, Ph.D.,  
5 Plaintiff,

Case Number 20CV34319

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 RULE 30(b)(6) DEPOSITION OF STUART JAMES BUTLER  
designated corporate representative for  
14 FEC UNITED  
15 August 11, 2021

16 APPEARANCES:

17 FOR THE PLAINTIFF:

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25 Page 1

1 APPEARANCES (Continued):  
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Also Present:  
7 Dennis Clayton, Videographer  
Rebecca Dominguez, Veritext Case Manager (remotely)  
8 Sidney Powell (remotely)  
Mr. Gray (remotely/unidentified)  
9  
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1 PURSUANT TO WRITTEN NOTICE and the appropriate rules  
2 of civil procedure, the video-recorded deposition of  
3 STUART JAMES BUTLER, called for examination by Plaintiff,  
4 was taken at 1437 Bannock Street, Courtroom 409, Denver,  
5 Colorado, commencing at 9:24 a.m., on August 11, 2021,  
6 before Sara A. Stueve, appearing remotely, Registered  
7 Professional Reporter and Notary Public in and for the  
8 State of Colorado.  
9  
10 I N D E X  
11  
12 EXAMINATION OF STUART JAMES BUTLER: PAGE  
By Mr. Skarnulis 8  
13  
14 PLAINTIFF'S DEPOSITION EXHIBITS PAGE  
Exh 89 Plaintiff's Notice of Intention to Take 12  
15 Oral and Videotaped Deposition of the  
Authorized Representative of Defendant  
16 FEC United; Exhibit A attached  
17  
18  
19  
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1 PROCEEDINGS  
 2 \* \* \* \* \*  
 3 THE VIDEOGRAPHER: Good morning. We're going on  
 4 the record at 9:24, on August 11, 2021.  
 5 Please note that microphones are sensitive and  
 6 may pick up whispering, private conversations, and  
 7 cellular interference. Please turn off all phones and  
 8 place them away from the microphones, as they can  
 9 interfere with deposition audio. Audio and video  
 10 recording will continue to take place unless all parties  
 11 agree to go off the record.  
 12 This is Media Unit Number 1 of the  
 13 video-recorded deposition of FEC United, with designated  
 14 representative Stuart J. Butler, taken by counsel for  
 15 plaintiffs in the matter of Eric Coomer, Ph.D. v.  
 16 Donald J. Trump for President, Inc., et al., filed in the  
 17 District Court, Denver County, State of Colorado, Case  
 18 Number 2020CV034319.  
 19 This deposition is being held at the Denver  
 20 County District Court, located at 1437 Bannock Street,  
 21 Courtroom 409.  
 22 My name is Dennis Clayton from the firm Myers  
 23 Legal Video, and I'm the videographer. The court reporter  
 24 today is Sara Stueve from the firm Veritext Legal  
 25 Solutions. I am not related to any party in this action,

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1 nor am I financially interested in the outcome.  
 2 Counsel and all present -- all counsel present  
 3 in the room will now state their appearances. Those  
 4 appearing remotely will be noted on the transcript.  
 5 Please state your appearances and affiliations  
 6 for the record, beginning with the noticing attorney.  
 7 MR. SKARNULIS: Good morning. My name is  
 8 Steve Skarnulis. I'm joined with my partner [sic],  
 9 Charlie Cain and Brad Kloewer. We represent the  
 10 plaintiff, Dr. Eric Coomer.  
 11 MS. HALL: Andrea Hall on behalf of  
 12 Joseph Oltmann, FEC United, and Shuffling Media -- or  
 13 Madness Media. Andrea Hall and co-counsel, Ingrid  
 14 DeFranco.  
 15 MR. ZAKHEM: John Zakhem on behalf of  
 16 Donald J. Trump for President, Inc.  
 17 MR. PEARMAN: Shaun Pearman on behalf of Sidney  
 18 Powell.  
 19 MR. SEERVELD: Chris Seerveld on behalf of  
 20 Defending the Republic.  
 21 MR. SKARNULIS: And before we get started,  
 22 Mr. Butler, a few -- a couple things that I want to get on  
 23 the record.  
 24 First, as in our prior depositions, I think we  
 25 all agree that one objection by a defendant attorney is

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1 good for all. And so let's proceed with that.  
 2 I guess that's all I need to put on the record.  
 3 THE VIDEOGRAPHER: The court reporter has a  
 4 brief statement, then will swear in the witness.  
 5 THE REPORTER: Thank you, Dennis.  
 6 The attorneys participating in this deposition  
 7 acknowledge that I am not physically present in a  
 8 deposition room and that I will be reporting this  
 9 deposition remotely. They further acknowledge that, in  
 10 lieu of an oath administered in person, the witness will  
 11 verbally declare his testimony in this matter is given  
 12 under penalty of perjury.  
 13 The parties and their counsel consent to this  
 14 arrangement and waive any objections to this manner of  
 15 reporting. If there are any objections to this manner of  
 16 reporting, please state them at this time.  
 17 STUART JAMES BUTLER,  
 18 having been first duly sworn to state the whole truth,  
 19 testified as follows:  
 20 THE REPORTER: Thank you.  
 21 Counsel, you may proceed.  
 22 MR. SKARNULIS: Thank you.  
 23 DIRECT EXAMINATION  
 24 BY MR. SKARNULIS:  
 25 Q. Good morning, Mr. Butler. Could you state your

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1 name for the record?  
 2 A. Stuart James Butler.  
 3 Q. Have you given a deposition before?  
 4 A. No, I have not.  
 5 Q. All right. A few ground rules, then.  
 6 First of all, you understand that your testimony  
 7 here in -- actually, in the courtroom today is the same as  
 8 if you were in front of the judge and the jury?  
 9 A. I do.  
 10 Q. All right. And you're doing a good job of it so  
 11 far. But I tend to speak a little slowly to help our  
 12 court reporter. If you'll wait until the end of my  
 13 question and then provide your answer, that'd be great.  
 14 Can we agree to that?  
 15 A. Absolutely.  
 16 Q. Also, if you don't understand one of my  
 17 questions, feel free to speak up. I'm glad to rephrase.  
 18 I want to make sure that everything is -- is clear for us.  
 19 Is that okay?  
 20 A. Absolutely.  
 21 Q. And is there any reason or impairment that may  
 22 affect your ability to give testimony in this case today?  
 23 A. No.  
 24 Q. All right. And you are here today as a  
 25 representative for FEC United; is that right?

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1 A. Yes.  
2 Q. What is FEC United?  
3 A. FEC United is a nonprofit group, the three  
4 pillars of our -- of our country: faith, education, and  
5 commerce.  
6 Q. Okay.  
7 A. I could read you the purpose statement if that  
8 will help you, but that the's what we are. We're just a  
9 501(c)(4).  
10 Q. All right. And what is your role with  
11 FEC United?  
12 A. I am the temporary president of FEC United.  
13 Q. Okay. When -- when did you become the temporary  
14 president of FEC United?  
15 A. Late June of this year.  
16 Q. All right. What caused that to happen?  
17 A. They -- we needed to have a -- somebody at the  
18 helm of the ship, I guess, for lack of a better term.  
19 Q. Who was the president prior to you becoming the  
20 temporary president?  
21 A. There has not been a president since sometime  
22 last year.  
23 Q. Okay. When last year?  
24 A. I don't know the date exactly. I wasn't part of  
25 the organization then.

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1 Q. Okay. When did you become a part of the  
2 organization?  
3 A. I -- I initially started to volunteer to help in  
4 the organization in late February, early March this  
5 year --  
6 Q. Okay.  
7 A. -- working an hour or two a week.  
8 Q. Why did you decide to become involved?  
9 A. Because I believed in what the organization was  
10 doing.  
11 Q. Okay. What was it that the organization was  
12 doing at that time?  
13 A. Helping -- helping churches and businesses and  
14 parents understand what's going on in our communities  
15 right now and letting them know what their rights are.  
16 Q. All right. What did you do to prepare for  
17 today's deposition?  
18 A. I reviewed the questions in the court document  
19 and asked questions of Joseph Oltmann and did some  
20 research through some of the documentation that I had  
21 access to.  
22 Q. Okay. When you say "research," what documents  
23 did you review?  
24 A. I just looked at some of the purpose statements,  
25 mission statements, things along those lines.

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1 Q. All right. I'm going to hand you what I've  
2 marked as Exhibit 89. We're going in sequential order  
3 from the prior depositions.  
4 (Plaintiff's Exhibit Number 89 was introduced.)  
5 Q. (By Mr. Skarnulis) Do you recognize this?  
6 A. Yes. I've seen this.  
7 Q. All right. And have you reviewed that?  
8 A. Yes. I reviewed the examination -- the matters  
9 on which the examination is requested.  
10 Q. Okay. When did you review that document?  
11 A. I believe it was Thursday to Friday of last  
12 week. Not sure the exact time.  
13 Q. Okay. And what did you do to prepare to answer  
14 the topics that are listed in Exhibit A to the notice?  
15 A. I asked Joe what -- I asked Joe for input on  
16 what these items were.  
17 Q. Okay. Why has there been no president of  
18 FEC United for some time?  
19 A. I don't know the answer to that.  
20 Q. Okay. Who would?  
21 A. I would assume Joseph Oltmann would.  
22 Q. All right. Does Joseph Oltmann have a current  
23 role with FEC United?  
24 A. Joe Oltmann is the chairman of the board, and  
25 that's -- that's it.

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1 Q. Okay. And I may not be clear on this. Prior to  
2 becoming the temporary president, what was your title with  
3 FEC United?  
4 A. Did not have a title. I was a volunteer.  
5 Q. Okay.  
6 A. I still am.  
7 Q. All right. Same as -- as when you were  
8 volunteering when you started?  
9 A. Uh-huh.  
10 Q. Or have you increased your volunteer hours?  
11 A. Well, I've increased it somewhat, yes.  
12 Q. How many -- how many discussions did you have  
13 with Mr. Oltmann to prepare for your deposition today?  
14 A. One.  
15 Q. When was that?  
16 A. Friday or Monday. I don't remember the exact  
17 date.  
18 Q. Okay. Monday --  
19 A. It was just this past Monday.  
20 Q. All right.  
21 A. Just to make sure I was prepared for the  
22 questions.  
23 Q. Great.  
24 What do you understand this case to be about?  
25 A. I don't know. I'm honestly not sure.

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1 Q. Have you read the --  
2 A. I mean, I've read this, but I still don't  
3 understand it. But --  
4 Q. Okay. Have you read the complaint that was  
5 filed by the plaintiff in this matter?  
6 A. No.  
7 Q. What do you know about Dr. Coomer?  
8 A. I know of his name, but I don't know anything  
9 about him.  
10 Q. How do you know his name?  
11 A. Well, I've heard his name mentioned when it --  
12 when it comes to Dominion Voting Systems, but I don't know  
13 anything about Dr. Coomer.  
14 Q. Okay. Do you have -- do you, as a  
15 representative of FEC United, have an opinion as to  
16 whether Dr. Coomer personally influenced the outcome of  
17 the 2020 presidential --  
18 A. I don't have an opinion on that.  
19 Q. Gotta let me finish.  
20 A. Okay.  
21 Q. -- personally influenced the outcome of the 2020  
22 presidential election?  
23 A. I don't have an opinion on that.  
24 Q. Okay. Do you know where Mr. Oltmann is?  
25 A. No.

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1 Q. So what did Mr. Oltmann tell you in getting you  
2 prepared to give testimony today as a representative?  
3 A. We went through the 21 questions, and we  
4 specifically discussed those.  
5 Q. Okay. And did you -- okay. Well, let's just go  
6 to Exhibit A to this. If you go back to the fourth page,  
7 do you see the "Matters upon which examination is  
8 requested?"  
9 A. Yes.  
10 Q. I see you have typewritten answers to those  
11 questions.  
12 A. Yes.  
13 Q. Did you write those?  
14 A. Yes.  
15 Q. All right. And that was --  
16 A. I took a copy of the questions, and then I put  
17 my answers in there.  
18 Q. Okay. And again, we're kind of talking over  
19 each other a little bit.  
20 A. Okay.  
21 Q. We've got to look out for our court reporter.  
22 All right. So when you were talking with  
23 Mr. Oltmann, was this a phone call?  
24 A. Yes.  
25 Q. All right. And you took notes answering each of

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1 the questions?  
2 A. Yes.  
3 Q. Okay. And, now, there are questions there. Are  
4 those the same as Exhibit A on the fourth page of  
5 Exhibit 89 that I handed you there?  
6 A. Yes.  
7 Q. All right.  
8 So "All statements, broadcasts, and publications  
9 made, authorized, or ratified by you containing any  
10 statements regarding Dr. Coomer or  
11 Dominion Voting Systems."  
12 You see that?  
13 A. Yes.  
14 Q. What is FEC United's position as to the  
15 statements, broadcasts, and publications made?  
16 A. FEC United has no legal connection to  
17 Conservative Daily and makes no broadcasts or publications  
18 other than a newsletter to members.  
19 FEC United made no statements regarding  
20 Dr. Coomer or Dominion Voting Systems and ratified no  
21 statements, broadcasts, or publications made by  
22 Joe Oltmann or Conservative Daily.  
23 Q. Okay. And I'd ask, for our court reporter, you  
24 might want to read a little more slowly. She doesn't have  
25 the advantage of looking at the words on the paper there.

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1 A. Okay.  
2 Again, FEC United has no legal connection to  
3 Conservative Daily and makes no broadcasts or publications  
4 other than a newsletter to members.  
5 FEC United made no statements regarding  
6 Dr. Coomer or Dominion Voting Systems and ratified no  
7 statements, broadcasts, or publications made by  
8 Joseph Oltmann or Conservative Daily.  
9 Q. All right. Has FEC United's newsletter ever  
10 mentioned Dr. Coomer?  
11 A. Not to my knowledge.  
12 Q. Have you seen all the newsletters?  
13 A. I can't answer whether I've seen all of them.  
14 I've seen some recently, yes.  
15 Q. Okay. Were you getting newsletters, say, in  
16 January of --  
17 A. No.  
18 Q. -- 2021?  
19 A. No, I was not.  
20 Q. All right.  
21 Has FEC United produced its newsletters to  
22 counsel in this case for use in this litigation?  
23 A. I have no knowledge of that.  
24 Q. All right. Were you aware --  
25 THE VIDEOGRAPHER: Pardon the interruption, but

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1 I just received a message. They're asking if you could  
 2 just speak up a little bit. They're having a difficult  
 3 time hearing your questions.  
 4 MR. SKARNULIS: No problem.  
 5 Q. (By Mr. Skarnulis) Okay. Are you aware that --  
 6 do you watch Conservative Daily?  
 7 A. I have on occasion, yes. I haven't watched it  
 8 in a while, no.  
 9 Q. Are you aware that Mr. Oltmann frequently  
 10 features or discusses FEC United on Conservative Daily?  
 11 A. No, I'm not aware of that.  
 12 THE REPORTER: I apologize. The end of your  
 13 question, Mr. Skarnulis, was cut off.  
 14 MR. SKARNULIS: Oh, boy. This technology.  
 15 Sara, can -- is that better? I'm just going to,  
 16 kind of, lean in.  
 17 THE REPORTER: That is great.  
 18 MR. SKARNULIS: Okay. Good.  
 19 Q. (By Mr. Skarnulis) All right. Have you seen  
 20 any of the Conservative Daily podcasts in which  
 21 Mr. Oltmann has discussed both FEC United and Dr. Coomer?  
 22 A. No, I have not.  
 23 Q. Were you aware that on several interviews on  
 24 podcasts and other programs, such as The Eric Metaxas  
 25 Show, that Joe Oltmann, in connection with his discussion  
 Page 18

1 about his allegations against Dr. Coomer, he has featured  
 2 FEC United?  
 3 MS. DEFRANCO: Object to the form.  
 4 A. No. I don't know.  
 5 Q. (By Mr. Skarnulis) She'll object occasionally.  
 6 A. Okay. I couldn't hear what she said, so --  
 7 Q. Okay. Were you aware that Mr. Oltmann has given  
 8 interviews on other podcasts and -- and the publications  
 9 in which he mentions both FEC and his allegations against  
 10 Dr. Coomer?  
 11 A. No, I'm not aware of that.  
 12 Q. Do you know whether or not the controversy  
 13 surrounding this case with Dr. Coomer and Mr. Oltmann's  
 14 allegations have led to an increase in donations to  
 15 FEC United?  
 16 A. I'm not aware of that, no.  
 17 Q. Okay. Does -- well, let me back up a little  
 18 bit. When was FEC United formed?  
 19 A. I don't know the answer to that.  
 20 Q. Okay. Who are the officers of FEC United, in  
 21 addition to you as temporary president?  
 22 A. Joe Oltmann is the chairman of the board. I  
 23 don't know who all the board members are. I have not been  
 24 part of a board meeting yet.  
 25 Q. Okay. Who are some of the board members that  
 Page 19

1 you know of?  
 2 A. John Tiegen -- Tiegen -- is one of them.  
 3 Henry Allen is another one. I don't know the others.  
 4 Q. Have you discussed your testimony today with  
 5 either Mr. Tiegen or Mr. Allen?  
 6 A. No, sir.  
 7 Q. All right. Do you know how long Mr. Tiegan and  
 8 Mr. Allen have been with FEC United?  
 9 A. No, I do not.  
 10 Q. Do you know if it's longer than you?  
 11 A. I would imagine so, but I don't know, sir, no.  
 12 Q. Would -- would it be possible for those  
 13 individuals have more knowledge about the matters  
 14 presented in Exhibit 89, the notice, than you?  
 15 A. No.  
 16 Q. Why not?  
 17 A. Well, it's my opinion that they probably  
 18 wouldn't know more.  
 19 John Tiegan is a board -- member of the board,  
 20 is not a part of the day-to-day operations of FEC United,  
 21 and neither is Henry Allen.  
 22 Q. What are the day-to-day operations of  
 23 FEC United?  
 24 A. Communication with membership, social media  
 25 postings.  
 Page 20

1 Q. Now that you're temporary president, are you  
 2 responsible for those day-to-day operations?  
 3 A. No, sir.  
 4 Q. Who is?  
 5 A. The single paid employee.  
 6 Q. Who is the single paid employee of FEC United?  
 7 A. Stephanie Wheeler.  
 8 Q. And what's Stephanie Wheeler's title?  
 9 A. Director of communication.  
 10 Q. Okay. Are there any unpaid or volunteer  
 11 employees of FEC United?  
 12 A. No. There's volunteers but no employee -- no  
 13 volunteer employees.  
 14 Q. Okay. How many members does FEC United have?  
 15 A. I don't know that answer.  
 16 Q. Do you have any -- I don't need you just to  
 17 guess, but do you have an approximate number in mind?  
 18 A. I would just be guessing. No.  
 19 Q. All right.  
 20 Let's go to Topic Number 2 on this notice: "All  
 21 broadcasts and publications made on your behalf, if any,  
 22 by Joseph Oltmann regarding Dr. Coomer or  
 23 Dominion Voting Systems."  
 24 A. None.  
 25 Q. Okay. So is it FEC United's position that when  
 Page 21

1 Joseph Oltmann is being interviewed on, say, for example,  
2 The Eric Metaxas Show, and he gives out FEC United's  
3 website, that that -- his appearance on that show is not,  
4 at least in part, on behalf of FEC United?  
5 A. I don't know the answer to that.  
6 Q. Would Joe Oltmann be the best person to answer  
7 these questions?  
8 A. Possibly.  
9 Q. Is he the person with the most knowledge about  
10 FEC United?  
11 A. Yes.  
12 Q. Do you know why Joe Oltmann sent you to attend  
13 this deposition?  
14 A. No.  
15 Q. You didn't ask him that?  
16 A. He asked me to do this. I said yes.  
17 Q. Okay. What did you ask him about what your role  
18 would be?  
19 A. My role is to take these questions and answer  
20 them to the best of my knowledge.  
21 Q. Are the answers you're giving to the matters  
22 presented on Exhibit A here on -- on 89 -- are the answers  
23 verbatim from Mr. Oltmann?  
24 A. No.  
25 Q. Are they your paraphrasing of what he told you?  
Page 22

1 A. Yes.  
2 Q. Did you have independent knowledge yourself of  
3 any of the matters on Exhibit A?  
4 A. I would have to go through each one individually  
5 and see before I answered that question. I would say  
6 that, for the most part, no. But --  
7 Q. And you know what? That's a fair point.  
8 Let's go back to Number 1: All statements,  
9 broadcasts, and publications.  
10 I know what your answer is, but had you seen,  
11 for example, Mr. Oltmann's appearance on The Eric Metaxas  
12 Show?  
13 A. No.  
14 Q. Had you seen Mr. Oltmann's appearance on  
15 Darren Northam's show?  
16 A. No.  
17 Q. It's a little more obscure.  
18 Had you seen Conservative Daily podcasts in  
19 which Mr. Oltmann referred to Dr. Coomer?  
20 A. No.  
21 Q. And I guess that -- I know your answer to  
22 Number 2, and I guess that, kind of, covers that.  
23 Number 3 is: "Joseph Oltmann's role, if any, as  
24 your" -- and that's FEC United -- "representative or  
25 agent, including any authorization of Joseph Oltmann to  
Page 23

1 make statements on your behalf or ratification of  
2 statements made by Joseph Oltmann regarding Dr. Coomer or  
3 Dominion Voting Systems."  
4 What's -- what did Mr. Oltmann tell you about  
5 that?  
6 A. The only action that FEC United authorized was  
7 an informational advertisement on Conservative Daily that  
8 was made on the -- those podcasts. FEC United was unaware  
9 of any topics which were covered -- would be covered in  
10 those podcasts until after the fact.  
11 Q. Okay.  
12 Now, what was Mr. Oltmann's role with FEC United  
13 in November of 2020?  
14 A. I don't know the answer to that.  
15 Q. All right. Do you know whether he might have  
16 been president?  
17 A. No, he was not president.  
18 Q. Do you know who was president then?  
19 A. Kristi Burton Brown --  
20 Q. Okay.  
21 A. -- I believe was her name.  
22 Q. Is she still involved with FEC United?  
23 A. No, she is not.  
24 Excuse me. I'll let you finish your question  
25 first. Sorry.  
Page 24

1 Q. I warned you. I'm a slow talker.  
2 A. I know.  
3 Q. Back to Number 3, I take it, just judging from  
4 the answer you read to me, that you really don't have  
5 independent knowledge of Joseph Oltmann's role or his  
6 ability to make statements on behalf of FEC United  
7 regarding Dr. Coomer or Dominion; right?  
8 A. Correct.  
9 Q. Okay. Do you understand what the allegations of  
10 Mr. Oltmann are that he's made about Dr. Coomer?  
11 A. No.  
12 Q. Not at all?  
13 A. No. I mean, I've heard what's going on. I said  
14 that I want to stay out of that completely. I came into  
15 FEC United to help the organization from that standpoint  
16 and want no involvement whatsoever in anything else.  
17 Q. And here you are.  
18 A. And yet, here I am.  
19 Q. All right.  
20 Okay. Matter Number 4 is: "FEC United's  
21 structure, ownership, or control in relationship to  
22 Joseph Oltmann, Shuffling Madness Media, Inc., and/or  
23 CD Solutions, Inc., or any other entity or affiliate you  
24 contend has an interest in the ownership or control of  
25 Conservative Daily."  
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1 A. FEC United is a 501(c)(4) nonprofit, and the  
2 temporary president, Joseph Oltmann, is the chairman of  
3 the board.  
4 FEC United has no knowledge of who owns  
5 Shuffling Madness Media, CD Solutions, or  
6 Conservative Daily, and FEC United has no ownership  
7 interest in any of those entities.  
8 Q. Okay. Are you paid a salary as temporary  
9 president?  
10 A. No, sir.  
11 Q. Do you know whether Mr. Oltmann is paid a salary  
12 by FEC United?  
13 A. I have no knowledge of that.  
14 Q. Okay. You don't know whether he is or whether  
15 he isn't?  
16 A. I have no knowledge of that.  
17 Q. All right.  
18 What -- do you know approximately what  
19 FEC United's annual budget for 2021 is?  
20 A. No, I don't.  
21 Q. As temporary president, understanding finances  
22 would seem to be an important thing; right?  
23 A. Yes, it would be. But we haven't -- I haven't  
24 gotten to that point yet.  
25 Q. Okay. Who would know?

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1 A. I'm not sure, actually.  
2 Q. Mr. Oltmann, possibly?  
3 A. Possibly.  
4 Q. Okay.  
5 All right. So do you know -- I understand it's  
6 a nonprofit, but do you know the structure of it? For  
7 example, are there other entities that are part of -- of  
8 the nonprofit?  
9 A. There are individual chapters. That's -- that's  
10 the structure.  
11 Q. Okay. So individual chapters are part of  
12 FEC United, Inc.?  
13 A. I guess I don't know if that's -- "Inc." is  
14 correct, but okay.  
15 Q. What -- what is the actual entity? I'm sorry.  
16 A. I don't know the -- I don't know the exact  
17 answer to what it's registered as, other than it's a  
18 501(c)(4).  
19 Q. Okay. Do the chapters -- well, how do the  
20 chapters relate to FEC United, the headquarters?  
21 A. How do they -- I don't understand the question.  
22 Q. Well, I mean, do individual chapters collect  
23 dues or donations and then pass them on to FEC United as a  
24 whole?  
25 A. They do not collect dues. Members pay dues

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1 online on an annual basis. Donations, if they are  
2 collected, are then returned to -- returned and deposited  
3 into the FEC United account, yes.  
4 Q. All right. And then does FEC United fund any of  
5 the activities of the local chapters?  
6 A. What do you mean by "fund?" Again, these are  
7 volunteer organizations.  
8 Q. Sure.  
9 A. So the locations, the venues, are volunteer.  
10 The people who run it are volunteers.  
11 Q. All right. How many chapters are there?  
12 A. Currently, there's three.  
13 Q. Where are they located?  
14 A. Denver Metro, Colorado Springs, and  
15 Grosse Pointe, Michigan.  
16 Q. Does FEC United have a headquarters, an office?  
17 A. We have office space at -- at -- I don't know.  
18 I'd have to look up the address -- a building in  
19 Denver Tech Center, Greenwood Village area.  
20 Q. Does -- is that office space shared with any  
21 other businesses?  
22 A. It's -- yes.  
23 Q. Who is it shared with?  
24 A. PIN Business Network.  
25 Q. Okay. Do you know what he PIN Business Network

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1 is?  
2 A. No.  
3 Q. Do you know what Mr. Oltmann's role or former  
4 role was with PIN?  
5 A. No. I don't.  
6 MS. DEFRANCO: I'm going to object that this is  
7 outside the scope of the topics.  
8 THE REPORTER: I'm having a really hard time  
9 hearing the objections. I'm sorry.  
10 (Discussion off the record.)  
11 THE VIDEOGRAPHER: Yeah. Just speak up. The  
12 microphone for Zoom is on the table.  
13 MS. DEFRANCO: I see. Okay. All right. I'll  
14 holler.  
15 MR. SKARNULIS: She objected to outside the  
16 scope.  
17 Q. (By Mr. Skarnulis) Let's go on to --  
18 THE WITNESS: Do you-all mind if I have some  
19 water?  
20 MR. SKARNULIS: No. Absolutely. Let's -- let's  
21 go off the record real quick.  
22 THE VIDEOGRAPHER: Going off the record. The  
23 time is 9:55.  
24 (Recess from 9:55 a.m. until 10:02 a.m.)  
25 THE VIDEOGRAPHER: We're back on the record.

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1 The time is 10:02.  
2 Q. (By Mr. Skarnulis) All right. Mr. Butler, if I  
3 could direct your attention back to Matter Number 4 on the  
4 exhibit we were looking at.  
5 And you read me an answer that topic, which is  
6 the structure, ownership, or controlling relationship with  
7 other entities and FEC United.  
8 Of that answer you read to me, how much of that  
9 came from your independent knowledge?  
10 A. I would say the majority of it.  
11 Q. Okay.  
12 A. I mean, I don't know -- I don't know who owns  
13 Shuffling Madness Media. I don't know who owns  
14 CD Solutions. I don't know who owns Conservative Daily.  
15 Q. Okay. You independently, before reviewing this,  
16 were you aware that FEC United had no interest in other  
17 entities or had no relationship with other entities?  
18 A. Rephrase that. I'm not sure I -- what you mean  
19 by that.  
20 Q. Well, okay. Are you familiar with all of  
21 FEC United's affiliations with other entities, if any?  
22 A. I believe I am, yes.  
23 Q. Okay. Prior to reviewing Number 4, had you  
24 heard of Shuffling Madness Media?  
25 A. No.

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1 Q. Had you heard of CD Solutions?  
2 A. No.  
3 Q. You'd heard of Conservative Daily?  
4 A. Yes.  
5 Q. All right.  
6 Let's go on to Number 5. Any -- Number 5 says:  
7 "Any knowledge of Dr. Coomer or Dominion Voting Systems  
8 prior to your publication, authorization, or ratification  
9 of statements regarding Dr. Coomer and  
10 Dominion Voting Systems, including what this knowledge  
11 was, when this knowledge was acquired, how this knowledge  
12 was acquired, and the basis of this knowledge."  
13 What is FEC United's answer on that document?  
14 A. FEC United had no such knowledge. It did not  
15 publish, authorize, or ratify any statements regarding  
16 Dr. Coomer or Dominion Voting Systems.  
17 FEC authorized an informational advertisement on  
18 Conservative Daily's podcast and was not aware of the  
19 subject matter of those podcasts prior to the broadcast.  
20 Q. Okay. And if you could read back to me that  
21 part about Conservative Daily. You were going a little  
22 fast. I may have missed it.  
23 A. FEC authorized an informational advertisement on  
24 Conservative Daily's podcasts. It was not aware of the  
25 subject matter of those podcasts.

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1 Q. Okay. Who at FEC United authorized an  
2 informational advertisement on Conservative Daily?  
3 A. I don't know.  
4 Q. It wasn't you; right?  
5 A. I wasn't part of FEC United.  
6 Q. Does FEC United pay for informational  
7 advertising on Conservative Daily?  
8 A. I don't know the answer to that.  
9 Q. Okay. Do you know how long FEC United has had  
10 informational advertisements on Conservative Daily?  
11 A. No, I do not.  
12 Q. Do you know whether FEC United has, in any way,  
13 benefited, in terms of a financial benefit, from its  
14 informational advertising with Conservative Daily?  
15 A. I do not.  
16 Q. Who would know that?  
17 A. I don't know.  
18 Q. On this Topic Number 5, which deals with  
19 allegations regarding Dr. Coomer, how could FEC United not  
20 be aware of the subject matter of those statements when  
21 its chairman is the host of Conservative Daily?  
22 A. FEC United is a volunteer organization made up  
23 of people working an hour or two a week. That's --  
24 they're not privy to everything that happens in  
25 Joseph Oltmann's life.

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1 Q. Okay. But Joe Oltmann, certainly, when he has  
2 his FEC chairman hat on, knows what he said on  
3 Conservative Daily; right?  
4 A. I don't know that. I don't know what's in Joe's  
5 head.  
6 Q. Okay. How much of that answer there comes from  
7 your personal knowledge?  
8 A. All of it.  
9 Q. Okay.  
10 A. I asked the questions. Those questions were  
11 answered, and that's what I put down for my answer.  
12 Q. Okay. Well, you asked the question of  
13 Mr. Oltmann --  
14 A. Yes.  
15 Q. -- isn't that right?  
16 A. Yes.  
17 Q. And then you put down what Mr. Oltmann told you.  
18 Maybe put your own spin on it, but -- it's in your words,  
19 but it's essentially what Mr. Oltmann told you; right?  
20 A. Yes.  
21 Q. Okay. Did Mr. Oltmann give you any reason why  
22 he couldn't be here on behalf of FEC United?  
23 A. No.  
24 Q. And I -- I kind of asked you this question  
25 before, but prior to preparing for your deposition, you'd

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1 heard of Eric Coomer; right?  
 2 A. Yes.  
 3 Q. What, generally, had you heard about  
 4 Eric Coomer?  
 5 MS. DEFRANCO: I'm going to object and ask for a  
 6 clarification whether you're asking him as a private  
 7 individual.  
 8 MR. SKARNULIS: That's fair.  
 9 Q. (By Mr. Skarnulis) And I am, kind of, asking  
 10 you as a private individual, because it informs your  
 11 testimony as the representative.  
 12 A. "Kind of" asking me that, or you are asking me  
 13 that?  
 14 Q. No. I am.  
 15 A. Okay.  
 16 I had heard of Dr. Eric Coomer. I had heard of  
 17 Dominion Voting Systems. Yes.  
 18 MS. DEFRANCO: Madam Court Reporter, were you  
 19 able to hear that clearly?  
 20 THE REPORTER: Yes, I was. Thank you for  
 21 asking.  
 22 MS. DEFRANCO: Okay. Thank you.  
 23 MR. SKARNULIS: She's very good.  
 24 Q. (By Mr. Skarnulis) Okay. Moving on.  
 25 Number 6: "Any investigation you conducted or directed  
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1 into the allegations against sentence Dr. Coomer prior to  
 2 your broadcast, publication, authorization, or  
 3 ratification of statements regarding Dr. Coomer or  
 4 Dominion Voting Systems, including contacting Dr. Coomer  
 5 or Dominion Voting Systems regarding the allegations."  
 6 And what's -- what's the answer you have to  
 7 that?  
 8 A. None. To the best of my knowledge, FEC United  
 9 had no involvement in those statements.  
 10 Q. Okay.  
 11 And is it FEC United's position that when  
 12 Joseph Oltmann made statements regarding Dr. Coomer on  
 13 various podcasts, he was not doing that on behalf of the  
 14 entity?  
 15 A. Correct.  
 16 Q. Okay. Why would you contend that?  
 17 A. Joe Oltmann operates as Joe Oltmann.  
 18 Q. Mr. Oltmann founded FEC United, didn't he?  
 19 A. Yes.  
 20 Q. Do you know when that was?  
 21 A. Again, no.  
 22 Q. Okay.  
 23 Let me go back to FEC United's purpose. And  
 24 I've seen the purpose statement, but I understand -- you  
 25 mentioned the three pillars of faith, education, and  
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1 commerce.  
 2 What activities does FEC United engage in to  
 3 promote that role?  
 4 A. The chapter meetings and the -- the groups  
 5 getting together and discussing those items.  
 6 Q. Okay. Anything else?  
 7 A. No.  
 8 Q. Does FEC United hold rallies?  
 9 A. We have had prayer vigils, and we have had  
 10 groups of people that go to different courthouses when  
 11 there are certain things related to matters of education  
 12 or faith.  
 13 Q. Like what, for example?  
 14 A. Well, the school boards and -- they go to school  
 15 board meetings, and they want to make sure that the  
 16 parents are involved with their own school boards, and  
 17 that the curriculum that is being taught is the curriculum  
 18 that the parents would like.  
 19 Q. Okay. And what else? As far as commerce, what  
 20 does FEC United engage in?  
 21 A. Helping to make sure that businesses don't -- I  
 22 mean, the -- the purpose of FEC United was originally with  
 23 the shutdowns and making sure that businesses understand  
 24 their rights. That's what the purpose is.  
 25 Q. Does FEC United engage in any political  
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1 activity?  
 2 A. No.  
 3 Q. Are you sure of that?  
 4 A. No, not a hundred percent. To the best of my  
 5 knowledge, we do not.  
 6 Q. Okay.  
 7 A. We're allowed -- limited as a (c)(4) -- limited  
 8 advocacy politically.  
 9 Q. All right. Have you reviewed the rules for  
 10 501(c)(4)s?  
 11 A. Yes.  
 12 Q. Did you do that in preparation for testimony  
 13 today or in your role as temporary president?  
 14 A. Prior to that. I'm involved in other (c)(4)s.  
 15 Q. Fair enough.  
 16 I think I've covered Number 7, but if you want  
 17 to give me the answer that you have there for Number 7, I  
 18 want to, at least, get that on our record.  
 19 A. It's the same: FEC made no broadcast or  
 20 publication of any statements regarding Dr. Coomer or  
 21 Dominion Voting Systems and did not authorize or ratify  
 22 any such statements. FEC United authorized only an  
 23 informational advertisement to be run on  
 24 Conservative Daily podcasts.  
 25 Q. Okay. Number 8 -- I'm guessing the answer's  
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1 going to be the same?  
2 A. Yes, sir.  
3 Q. Go ahead and read it for our court reporter, if  
4 you would.  
5 A. Do you want to read question first?  
6 Q. Sure.  
7 A. Okay.  
8 Q. "Any knowledge of evidence refuting the  
9 allegations against Dr. Coomer held prior to your  
10 broadcast, publication, authorization, or ratification of  
11 statements regarding Dr. Coomer or  
12 Dominion Voting Systems."  
13 A. FEC United made no broadcast or publication of  
14 any statements regarding Dr. Coomer or  
15 Dominion Voting Systems and did not authorize or ratify  
16 any such statements. FEC United authorized only an  
17 informational advertisement to be run on  
18 Conservative Daily podcasts.  
19 Q. Okay. Moving on, Number 9 is: "Any knowledge  
20 of evidence you claim supports your statements about  
21 Dr. Coomer as it relates to his alleged role in rigging  
22 the 2020 Presidential election."  
23 A. FEC United made no such statements and has no  
24 knowledge or evidence concerning those statements.  
25 Q. Okay. Number 10: "Any knowledge of or

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1 connection with Joseph Oltmann held prior to your  
2 publication, authorization, or ratification of statements  
3 regarding Dr. Coomer or Dominion Voting Systems."  
4 A. FEC United made no publication or statements  
5 concerning Dr. Coomer or Dominion Voting Systems and did  
6 not authorize or ratify any such statement.  
7 Q. Okay. How about any knowledge of or connection  
8 with any other defendant held prior to your publication,  
9 authorization, or ratification of statements regarding  
10 Dr. Coomer or Dominion Voting Systems?  
11 A. None. Other than Joseph Oltmann, FEC United has  
12 no communication or connection with any other defendant.  
13 Q. Okay. So Joe Oltmann, as the chairman of  
14 FEC United, though, is also the host of  
15 Conservative Daily; right?  
16 MS. DEFRANCO: Object to the form.  
17 Q. (By Mr. Skarnulis) And you can go ahead and  
18 answer.  
19 I mean, there's some connection between  
20 Mr. Oltmann, as the host of Conservative Daily, and also  
21 as the chairman of FEC United; right?  
22 A. Joe Oltmann owns a number of businesses. I -- I  
23 don't know every business he has relationship with.  
24 Q. Okay.  
25 A. FEC United does not know all of the things that

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1 Joe Oltmann is involved in.  
2 Q. Okay.  
3 How many board members are there at FEC United?  
4 A. I'm not sure if the number is five or seven.  
5 Q. Okay. And I know -- does the board  
6 keep minutes?  
7 A. I would assume so, yes.  
8 Q. Okay. You have not attended a board meeting?  
9 A. No.  
10 Q. I know I asked about officers of FEC United  
11 before, but are there any other -- and you mentioned, I  
12 believe it was Ms. Wheeler.  
13 Are there any other directors or people who have  
14 titles as part of FEC United?  
15 A. No.  
16 Q. Okay.  
17 12 is: "Any agreement between you and any other  
18 defendant regarding the publication of statements  
19 regarding Dr. Coomer or Dominion Voting Systems."  
20 A. None. Other than Joseph Oltmann, FEC United had  
21 no communication or connection with any other defendant  
22 and had no communication with Joseph Oltmann regarding his  
23 statements about Dr. Coomer or Dominion Voting Systems.  
24 Q. Okay.  
25 Number 13 -- well, let me ask it this way before

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1 I get into the substance of Number 13. Has FEC United  
2 published any allegations of election fraud in the 2020  
3 election?  
4 A. Not to my knowledge.  
5 Q. Has FEC United held any meetings or rallies  
6 concerning claims of election fraud in the 2020 election?  
7 A. Not to my knowledge.  
8 Q. And then let me go ahead and read Number 13:  
9 "Any other broadcasts or publications of allegations of  
10 election fraud relating to the 2020 presidential election  
11 that you made, authorized, or ratified prior to the  
12 broadcasts and publications you made, authorized, or  
13 ratified regarding Dr. Coomer or Dominion Voting Systems."  
14 A. None. FEC United does not make broadcasts or  
15 publications, did not authorize or ratify any such  
16 broadcasts or publications.  
17 Q. Okay. Number 14 is: "Any financial benefit you  
18 derive from broadcasts and publications you made,  
19 authorized, or ratified regarding Dr. Coomer or  
20 Dominion Voting Systems, including solicitations for  
21 donations in support of legal challenges to the 2020  
22 presidential election results."  
23 A. None. FEC United does not make broadcasts or  
24 publications, did not authorize or ratify any such  
25 broadcasts or publications, and did not realize any

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1 financial benefit or increased membership as a result of  
2 the Conservative Daily podcast and did not solicit any  
3 donations for the purpose of making a legal challenge.  
4 Q. Okay. Do you -- and I judge from our prior  
5 discussion that you don't have personal knowledge of the  
6 amount of donations that FEC United has received since  
7 November of 2020; right?  
8 A. Correct.  
9 Q. And do you have any personal knowledge of the  
10 number of members that FEC United has maintained from  
11 November 2020 forward?  
12 A. Do not.  
13 Q. Okay. Before I read Number 15, does FEC United  
14 have an email system?  
15 A. Yes.  
16 Q. Okay. So -- and do -- for example, do you  
17 have -- as president, do you have an FEC United email  
18 account?  
19 A. Yes, I do.  
20 Q. All right. Who else has an FEC United email  
21 account?  
22 A. Joe, Stephanie. I mean, there's a -- a fair  
23 amount of volunteers do, because that makes the  
24 communication easier.  
25 Q. Okay.

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1 A. I don't know the number.  
2 Q. All right. Are you aware of any emails from an  
3 FEC United email address that is regarding Dr. Coomer or  
4 this lawsuit?  
5 A. I am aware of a -- of a few emails, yes.  
6 Q. Okay. What are those emails?  
7 A. I received copies of a few emails that Joe had  
8 sent to somebody regarding that.  
9 Q. Okay. And you don't recall who Joe sent those  
10 to?  
11 A. I'm not sure. I don't remember -- I don't  
12 remember who that was. I can't ask her. I don't -- yeah.  
13 I realize I can't ask her. I don't remember who it was,  
14 though.  
15 Q. Okay. Do you remember what the subject was?  
16 A. It had to do with election fraud.  
17 Q. Okay. From your recollection, what did it say?  
18 A. I -- I couldn't tell you. I just -- I saw the  
19 emails Monday, I believe, it was.  
20 I just said that -- I said that I could say  
21 that, yes, I saw them. But I didn't really read them and  
22 understand what they were saying.  
23 He sent it to somebody. I don't know who it  
24 was. Could have been another podcaster as far as I know.  
25 Q. In preparing to testify as a representative of

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1 FEC United, wouldn't you think it would have been  
2 important for you to carefully review such emails?  
3 A. In hindsight, yes.  
4 Q. Are -- and let's go to Number 15 so I can hear  
5 what the answer is: "All communications, including email  
6 and text messages," pause there.  
7 Are there any cell phones that FEC United has?  
8 A. No. Not to my knowledge.  
9 Q. Do you and other members of FEC United text?  
10 A. I text occasionally with some just to -- when  
11 we're -- when we're going to a meeting. "I'm on my way"  
12 or "I'll be ten minutes late."  
13 Q. Are you of any -- are you aware of any text  
14 messages, I guess, between FEC United members regarding  
15 Dr. Coomer?  
16 A. I am not aware of any.  
17 Q. Okay. Let me -- let me move on on Number 15. I  
18 stopped after "text messages."  
19 It continues "about Dr. Coomer or Dominion  
20 Voting Systems between you and:  
21 A. Any other Defendant  
22 b. Ron Watkins (including any aliases)  
23 c. Matthew DePerno  
24 d. Patrick Byrne  
25 e. Russell Ramsland

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1 f. Garrett Ziegler  
2 g. The person that assisted you in gaining  
3 access to the "Antifa call" as described by you on the  
4 David K. Clements "The Professor's Record" podcast dated  
5 April 20, 2021."  
6 A. None. FEC United had no contact with any of  
7 these individuals and has no knowledge of any such  
8 communications.  
9 FEC United is aware that Joseph Oltmann  
10 communicated with -- there's the name -- Charles Herring  
11 through an FEC United email address on one or more  
12 occasions, but those communications did not involve  
13 FEC business.  
14 Mr. Oltmann apparently used that email address  
15 as a matter of convenience, as the subject matter was not  
16 relevant to FEC United.  
17 Q. Did you review those emails?  
18 A. I perused those emails. I did not -- I did not  
19 read them and digest them. I didn't think that I needed  
20 to for this.  
21 Q. What was the subject matter?  
22 A. I believe it was election fraud.  
23 Q. Okay. Did it mention Dr. Coomer?  
24 A. I believe it did, yes.  
25 Q. Okay. Can you recall what it said about

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1 Dr. Coomer?  
 2 A. Once again, no, I do not.  
 3 Q. Okay. Do you know who the named individuals are  
 4 in Topic Number 15?  
 5 A. I know who -- I know who Matt DePerno is. I  
 6 know who Patrick Byrne is. I don't know the others.  
 7 Q. Who do you understand Matt DePerno to be?  
 8 A. I believe he's an attorney in Minnesota or  
 9 Michigan or --  
 10 Q. And who do you understand Patrick Byrne to be?  
 11 A. I know Patrick Byrne as the former CEO of  
 12 Overstock.com.  
 13 Q. Do you know anything else about Mr. Byrne?  
 14 A. No.  
 15 Q. Have you seen Mr. Byrne's movie The Deep Rig?  
 16 A. Yes.  
 17 Q. I think I know the answer to Number 16, but any  
 18 retractions you have made with respect to statements  
 19 regarding Dr. Coomer?  
 20 A. None. FEC United made no such statements.  
 21 Q. 17: "Your standards for journalistic practices,  
 22 if any, that applied to your broadcasts or publications on  
 23 the 2020 Presidential election and whether you claim to be  
 24 a journalist in the first instance (and any facts  
 25 supporting that contention)."

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1 A. FEC United is a 501(c)(4) and is not a media  
 2 organization.  
 3 UNIDENTIFIED SPEAKER: Steve, can we take a  
 4 break until those sirens pass? I can't hear a word of  
 5 what's going. I'm sorry.  
 6 THE WITNESS: They're gone.  
 7 MR. SKARNULIS: They just stopped.  
 8 UNIDENTIFIED SPEAKER: Okay. I'm sorry about  
 9 that.  
 10 MR. SKARNULIS: No problem.  
 11 Q. (By Mr. Skarnulis) Go ahead and answer.  
 12 A. My answer -- I'll start again.  
 13 FEC United is a 501(c)(4) and is not a media  
 14 organization. FEC United made no such broadcasts or  
 15 publications and makes no claim to be a media organization  
 16 or a journalist.  
 17 Q. Okay. 18: "Internal communications between  
 18 your staff members about election fraud coverage and  
 19 coverage of the January 6, 2020 insurrection."  
 20 A. FEC United is not a media organization and made  
 21 no election fraud coverage or coverage of the  
 22 January 6, 2020 -- I don't like that word, but --  
 23 insurrection.  
 24 Q. Okay.  
 25 MS. DEFRANCO: And, Mr Skarnulis, I'm going to

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1 object to -- to the next question because I believe it's  
 2 outside the parameters of the Court's order.  
 3 MR. SKARNULIS: Well, did -- let me ask the  
 4 question first.  
 5 Q. (By Mr. Skarnulis) Did FEC United publish  
 6 anything asking its members to attend the January 6, 2020,  
 7 protest?  
 8 MS. DEFRANCO: And I'm going to object again on  
 9 the same basis.  
 10 Q. (By Mr. Skarnulis) Okay. And you can answer.  
 11 A. Not to my knowledge.  
 12 Q. All right. Did you attend?  
 13 A. Absolutely not.  
 14 Q. The next topic regards any information regarding  
 15 FEC United efforts to identify, investigate, or expose  
 16 members of Antifa.  
 17 A. None. FEC United's mission: FEC United  
 18 promotes the common good and general welfare by,  
 19 1) Teaching and empowering persons and communities to  
 20 advocate for themselves.  
 21 MS. DEFRANCO: Slow down.  
 22 THE WITNESS: Too loud?  
 23 MS. DEFRANCO: Slow down.  
 24 THE WITNESS: Slow down. I want to get this  
 25 over with.

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1 MR. ZAKHEM: Can I just ask that we make that  
 2 record an exhibit?  
 3 MR. SKARNULIS: Sure. I think that's a good  
 4 idea.  
 5 THE WITNESS: My notes?  
 6 MR. SKARNULIS: Yes, sir.  
 7 THE WITNESS: Of course.  
 8 THE REPORTER: I don't know if you-all wanted  
 9 that conversation on the record -- that sidebar  
 10 conversation on the record, but I didn't hear it.  
 11 MR. SKARNULIS: Oh. John Zakhem, Sara, asked me  
 12 to make witness's document that he's referring to an  
 13 exhibit, and I told him I'd go ahead and do that.  
 14 And we can probably get you a copy of that so  
 15 you don't have to -- you know, so you didn't miss  
 16 anything.  
 17 THE REPORTER: Thank you so much. That'd be  
 18 very helpful.  
 19 MR. SKARNULIS: Sure.  
 20 A. All right. Let me do this again slowly. My  
 21 apologies.  
 22 The answer to the question, to Number 20, is:  
 23 None. FEC United's mission: FEC United promotes the  
 24 common good and general welfare by, 1) Teaching and  
 25 empowering persons and communities to advocate for

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1 themselves and providing opportunities for them to  
 2 participate in civics education and projects;  
 3 2) Promoting the value of faith, education, and commerce  
 4 in the United States by taking action to help these  
 5 societal pillars thrive.  
 6 FEC United operates under its mission statement  
 7 and does not investigate Antifa.  
 8 Q. (By Mr. Skarnulis) All right. And then, to  
 9 close to loop here: "Any statements you made regarding  
 10 Dr. Coomer or the allegations against Dr. Coomer in  
 11 connection with efforts to establish new chapters of  
 12 FEC United, expand FEC United's presence in other states,  
 13 or promote FEC United's efforts."  
 14 A. None.  
 15 MR. SKARNULIS: Okay.  
 16 Let's go off the record.  
 17 THE VIDEOGRAPHER: Going off the record. Time  
 18 is 10:30.  
 19 (Recess from 10:30 a.m. until 10:40 a.m.)  
 20 THE VIDEOGRAPHER: We're back on the record.  
 21 The time is 11:40 a.m. -- or 10:40 a.m., Mountain.  
 22 Q. (By Mr. Skarnulis) Mr. Butler, earlier I asked  
 23 you about the last president. I believe you said her name  
 24 was Kristi Burton Brown; is that right?  
 25 A. Yes.

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1 Q. And I know you told me. I hate to ask it again,  
 2 but when did you say she stopped being president?  
 3 A. I have no knowledge of that date. I believe  
 4 that's what I said before.  
 5 Q. Do you know if she was president in November of  
 6 2020?  
 7 A. I do not.  
 8 Q. All right. Do you have any idea what her tenure  
 9 was?  
 10 A. I do not. It was before my involvement.  
 11 Q. All right.  
 12 Were you aware that Mr. Oltmann was supposed to  
 13 appear individually this morning and give testimony in  
 14 this case?  
 15 A. No, I was not.  
 16 UNIDENTIFIED SPEAKER: Object to form.  
 17 Q. (By Mr. Skarnulis) And they'll do that  
 18 occasionally.  
 19 Did Mr. Oltmann, when you were asking him about  
 20 the matters on this list, did he inform you that he was  
 21 unable to attend today?  
 22 A. He did not. We did not discuss that.  
 23 Q. Were you surprised that you were being asked to  
 24 testify in this case?  
 25 A. Yes.

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1 Q. Why?  
 2 A. I don't understand what FEC United's involvement  
 3 is in this.  
 4 Q. Okay. As temporary president of FEC United,  
 5 have you familiarized yourself with the matters that are  
 6 ongoing in this litigation?  
 7 MS. DEFRANCO: Objection. Asked and answered.  
 8 A. I believe I've answered that already.  
 9 Q. (By Mr. Skarnulis) Okay. That's fine.  
 10 Have you understood all my questions this  
 11 morning?  
 12 A. Yes.  
 13 Q. Have I been respectful and courteous to you?  
 14 A. Yes.  
 15 MR. SKARNULIS: I will pass the witness.  
 16 MS. DEFRANCO: And I have nothing. Thank you.  
 17 THE VIDEOGRAPHER: So are we done?  
 18 We are going off the record. The time is  
 19 10:42 a.m. And this concludes today's testimony given by  
 20 FEC United designated representative Stuart J. Butler.  
 21 The total number of media units used is one and will be  
 22 retained by Veritext Legal Solutions.  
 23 Thank you, all.  
 24 (Whereupon, the video record was concluded.)  
 25 MR. SKARNULIS: Thank you for your time.

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1 Mr. Butler.  
 2 THE REPORTER: As per previous depositions, I  
 3 would like to get transcript orders on the record, if I  
 4 could, please.  
 5 MR. ARRINGTON: This is Barry Arrington for  
 6 Sidney Powell, P.C. We'll take an electronic transcript  
 7 of this. And I guess we'll also taken an electronic  
 8 statement of the statement made in the previous  
 9 proceeding.  
 10 MS. BOEHMER: This is Margaret Boehmer for Eric  
 11 Metaxas. We will take an e-tran of the FEC United.  
 12 THE REPORTER: Okay.  
 13 MR. JOHNSON: Brad Johnson for OAN and Rion, and  
 14 we'll take an e-transcript for both as well.  
 15 THE REPORTER: Okay.  
 16 \* \* \* \* \*  
 17 WHEREUPON, the foregoing deposition was  
 18 concluded at 10:42 a.m. Total time on the record was  
 19 1 hours, 1 minute.  
 20  
 21  
 22  
 23  
 24  
 25


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1 I, STUART JAMES BUTLER, the deponent in the above  
 2 deposition, do hereby acknowledge that I have read the  
 3 foregoing transcript of my testimony, and state under oath  
 4 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  
 11 \_\_\_\_\_  
 12 STUART JAMES BUTLER  
 13  
 14 Subscribed and sworn to before me this \_\_\_\_\_ day of  
 15 \_\_\_\_\_, 20\_\_\_\_.  
 16 My commission expires: \_\_\_\_\_.  
 17  
 18 \_\_\_\_\_  
 19 NOTARY PUBLIC  
 20  
 21  
 22  
 23  
 24  
 25

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1 Ingrid J. DeFranco  
 2 defrancoi@yahoo.com  
 3 August 16, 2021  
 4 RE: Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.  
 5 8/11/2021, Stuart James Butler (#4708874)  
 6 The above-referenced transcript is available for  
 7 review.  
 8 Within the applicable timeframe, the witness should  
 9 read the testimony to verify its accuracy. If there are  
 10 any changes, the witness should note those with the  
 11 reason, on the attached Errata Sheet.  
 12 The witness should sign the Acknowledgment of  
 13 Deponent and Errata and return to the deposing attorney.  
 14 Copies should be sent to all counsel, and to Veritext at  
 15 errata-tx@veritext.com.  
 16  
 17 Return completed errata within 30 days from  
 18 receipt of testimony.  
 19 If the witness fails to do so within the time  
 20 allotted, the transcript may be used as if signed.  
 21  
 22 Yours,  
 23 Veritext Legal Solutions  
 24  
 25

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1 REPORTER'S CERTIFICATE  
 2 STATE OF COLORADO )  
 3 CITY AND COUNTY OF DENVER )  
 4 I, Sara A. Stueve, a Registered Professional Reporter  
 5 and Notary Public within and for the State of Colorado,  
 6 commissioned to administer oaths, do hereby certify that  
 7 previous to the commencement of the examination, the  
 8 witness was duly sworn by me to testify the truth in  
 9 relation to matters in controversy between the said  
 10 parties; that the said deposition was taken in stenotype  
 11 by me at the time and place aforesaid and was thereafter  
 12 reduced to typewritten form by me; and that the foregoing  
 13 is a true and correct transcript of my stenotype notes  
 14 thereof; that I am not an attorney nor counsel nor in any  
 15 way connected with any attorney or counsel for any of the  
 16 parties to said action nor otherwise interested in the  
 17 outcome of this action.  
 18 My commission expires October 26, 2024.  
 19  
 20  
 21   
 22 SARA A. STUEVE  
 23 Registered Professional Reporter  
 24 Notary Public, State of Colorado  
 25 August 16, 2021

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1 Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.  
 2 Stuart James Butler (#4708874)  
 3 E R R A T A S H E E T  
 4 PAGE \_\_\_ LINE \_\_\_ CHANGE \_\_\_\_\_  
 5 \_\_\_\_\_  
 6 REASON \_\_\_\_\_  
 7 PAGE \_\_\_ LINE \_\_\_ CHANGE \_\_\_\_\_  
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 9 REASON \_\_\_\_\_  
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 22 \_\_\_\_\_  
 23 \_\_\_\_\_  
 24 Stuart James Butler Date  
 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.

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE STATE RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS  
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at [www.veritext.com](http://www.veritext.com).

**Exhibit  
PX 0089**

Butler

DISTRICT COURT, CITY AND COUNTY OF  
DENVER, COLORADO  
1437 Bannock Street  
Denver, CO 80202

ERIC COOMER, Ph.D.,  
Plaintiff

vs.

DONALD J. TRUMP FOR PRESIDENT, INC.,  
et al.,  
Defendants

~~SERVED ONLY: July 29, 2021 8:03 AM~~  
FILING ID: A47F58E32AD07  
CASE NUMBER: 2020CV34319

▲ COURT USE ONLY ▲

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**RECHTKORNFELD PC**

1600 Stout Street, Suite 1400

Denver, Colorado 80202

303-573-1900 Telephone

Case Number: 2020cv034319

Division Courtroom: 409

**PLAINTIFF'S NOTICE OF INTENTION TO TAKE ORAL AND  
VIDEOTAPED DEPOSITION OF THE AUTHORIZED REPRESENTATIVE  
OF DEFENDANT FEC UNITED**

PLEASE TAKE NOTICE that counsel for Eric Coomer will take the video deposition of **FEC United on August 11, 2021, immediately following the conclusion of the deposition of Joseph Oltmann** 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. The deposition will take place at **Denver County Courthouse, 1437 Bannock Street, Courtroom 409, Denver, Colorado.**<sup>1</sup>

**FEC United** is directed to designate person(s) to testify on its behalf on the matters described in **Exhibit A** attached hereto.

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

Respectfully submitted this 29th day of July 2021.

/s/ Steve Skarnulis  
Steve Skarnulis, No. 21PHV6401

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<sup>1</sup> No conference line is available for this deposition.

**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 29th day of July 2021.

/s/ Steve Skarnulis  
Steve Skarnulis, No. 21PHV6401

## **EXHIBIT A**

### **I. DEFINITIONS**

1. “Dr. Coomer” refers to Eric Coomer, Plaintiff herein.
2. “You,” “your,” or “yourself” refers to FEC United, 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.

### **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.<sup>2</sup>
2. All broadcasts and publications made on your behalf, if any, by Joseph Oltmann regarding Dr. Coomer or Dominion Voting Systems.
3. Joseph Oltmann’s role, if any, as your representative or agent, including any authorization of Joseph Oltmann to make statements on your behalf or ratification of statements made by Joseph Oltmann regarding Dr. Coomer or Dominion Voting Systems.
4. Your structure, ownership or control and relationship to Joseph Oltmann, Shuffling Madness Media, Inc. and/or CD Solutions, Inc; or any other entity or affiliate you contend has an interest in the ownership or control of Conservative Daily.

---

<sup>2</sup> All references to Dominion Voting Systems are limited to and defined by the Court’s Discovery Order.

5. Any knowledge of Dr. Coomer or Dominion Voting Systems prior to 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.
6. Any investigation you conducted or directed into the Allegations<sup>3</sup> against Dr. Coomer prior to your broadcast, publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems, including contacting Dr. Coomer or Dominion Voting Systems regarding the Allegations.
7. Any knowledge of evidence supporting the Allegations against Dr. Coomer held prior to your broadcast, publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.
8. Any knowledge of evidence refuting the Allegations against Dr. Coomer held prior to your broadcast, publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.
9. Any knowledge of evidence you claim supports your statements about Dr. Coomer as it relates to his alleged role in rigging the 2020 Presidential election.
10. Any knowledge of or connection with Joseph Oltmann held prior to your publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.
11. Any knowledge of or connection with any other Defendant held prior to your publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.
12. Any agreement between you and any other Defendant regarding the publication of statements regarding Dr. Coomer or Dominion Voting Systems.
13. Any other broadcasts or publications of Allegations of election fraud relating to the 2020 Presidential election that you made, authorized, or ratified prior to the broadcasts and publications you made, authorized, or ratified regarding Dr. Coomer or Dominion Voting Systems.
14. Any financial benefit you derived from the broadcasts and publications you made, authorized, or ratified regarding Dr. Coomer or Dominion Voting Systems,

---

<sup>3</sup> Allegations refer to the claims made the basis of this suit in Plaintiff's First Amended Complaint.

including solicitations for donations in support of legal challenges to the 2020 Presidential election results.

15. 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. Matthew DePerno
  - d. Patrick Byrne
  - e. Russell Ramsland
  - f. Garrett Ziegler
  - g. The person that assisted you in gaining access to the “Antifa call” as described by you on the David K. Clements “The Professor’s Record” podcast dated April 20, 2021<sup>4</sup>
16. Any retractions you have made with respect to statements regarding Dr. Coomer.
17. Your standards for journalistic practices, if any, that applied to your broadcasts or publications on the 2020 Presidential election and whether you claim to be a journalist in the first instance (and any facts supporting that contention).
18. Internal communications between your staff members about election fraud coverage and coverage of the January 6, 2020 insurrection.
19. Your participation, if any, the January 6, 2020 insurrection, or media coverage thereof.
20. Any information regarding your efforts to identify, investigate, or expose members of “Antifa.”
21. Any statements you made regarding Dr. Coomer or the Allegations against Dr. Coomer in connection with efforts to establish new chapters of FEC United, expand FEC United’s presence in other states, or promote FEC United’s efforts.

---

<sup>4</sup> <https://rumble.com/vfudkf-joe-oltmann-exposes-dominion-votings-eric-coomer-ties-to-antifa-skinheads-a.html>



1. All statements, broadcasts and publications made, authorized, or ratified by you containing any statements regarding Dr. Coomer or Dominion Voting Systems.

FEC United has no legal connection to Conservative Daily, and makes no broadcasts or publications other than a newsletter to members. FEC United made no statements regarding Dr. Coomer or Dominion Voting Systems, and ratified no statements, broadcasts, or publications made by Joseph Oltmann or Conservative Daily

2. All broadcasts and publications made on your behalf, if any, by Joseph Oltmann regarding Dr. Coomer or Dominion Voting Systems.

None

3. Joseph Oltmann's role, if any, as your representative or agent, including any authorization of Joseph Oltmann to make statements on your behalf or ratification of statements made by Joseph Oltmann regarding Dr. Coomer or Dominion Voting Systems.

None. The only action FEC United authorized was an informational advertisement for FEC made on Conservative Daily's podcasts, and FEC United was unaware of the topic(s) which would be covered in those podcasts until after the fact.

4. Your structure, ownership or control and relationship to Joseph Oltmann, Shuffling Madness Media, Inc. and/or CD Solutions, Inc; or any other entity or affiliate you contend has an interest in the ownership or control of Conservative Daily.

FEC United is a 501(c)(4) non-profit. I am the president (pro tem) and Joseph Oltmann is the chairman of the board. FEC United has no knowledge of who owns Shuffling Madness Media, CD Solutions, Inc., or Conservative Daily, and FEC United and has no ownership interest in any of those entities.

FEC United is organized and operated exclusively for the promotion of social welfare in accordance with Section 501(c)(4) of the Internal Revenue Code. More specifically, FEC United promotes the common good and general welfare by (1) teaching and empowering persons and communities to advocate for themselves and providing opportunities for them to participate in civics education and projects; (2) promoting the value of faith, education, and commerce in the United States by taking action to help these societal pillars thrive.

5. Any knowledge of Dr. Coomer or Dominion Voting Systems prior to 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.

FEC United had no such knowledge and did not publish authorize or ratify and statements regarding Dr. Coomer or Dominion Voting Systems. FEC authorized an informational advertisement on Conservative Daily's podcasts, and was not aware of the subject matter of those podcasts prior to broadcast.

6. Any investigation you conducted or directed into the Allegations against Dr. Coomer prior to your broadcast, publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems, including contacting Dr. Coomer or Dominion Voting Systems regarding the Allegations.

None. To the best of my knowledge, FEC United had no involvement in those statements

7. Any knowledge of evidence supporting the Allegations against Dr. Coomer held prior to your broadcast, publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.

FEC made no broadcast or publication of any statements regarding Dr. Coomer or Dominion Voting Systems, and did not authorize or ratify any such statements. FEC United authorized only an informational advertisement to be run on Conservative Daily podcasts.

8. Any knowledge of evidence refuting the Allegations against Dr. Coomer held prior to your broadcast, publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.

FEC United made no broadcast or publication of any statements regarding Dr. Coomer or Dominion Voting Systems, and did not authorize or ratify any such statements. FEC United authorized only an informational advertisement to be run on Conservative Daily podcasts.

9. Any knowledge of evidence you claim supports your statements about Dr. Coomer as it relates to his alleged role in rigging the 2020 Presidential election.

FEC United made no such statements and has no knowledge or evidence concerning those statements.

10. Any knowledge of or connection with Joseph Oltmann held prior to your publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.

FEC United made no publication or statements concerning Dr. Coomer or Dominion Voting Systems, and did not authorize or ratify any such statements.

11. Any knowledge of or connection with any other Defendant held prior to your publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.

None. Other than Joseph Oltmann, FEC United had no communication or connection with any other defendant.

12. Any agreement between you and any other Defendant regarding the publication of statements regarding Dr. Coomer or Dominion Voting Systems.

None. Other than Joseph Oltmann, FEC United had no communication or connection with any other defendant and had no communication with Joseph Oltmann regarding his statements about Dr. Coomer or Dominion Voting Systems.

13. Any other broadcasts or publications of Allegations of election fraud relating to the 2020 Presidential election that you made, authorized, or ratified prior to the broadcasts and publications you made, authorized, or ratified regarding Dr. Coomer or Dominion Voting Systems.

None. FEC United does not make broadcasts or publications, did not authorize or ratify any such broadcasts or publications.

14. Any financial benefit you derived from the 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.

None. FEC United does not make broadcasts or publications, did not authorize or ratify any such broadcasts or publications, and did not realize any financial benefit or increased membership as the result of the Conservative Daily podcasts, and did not solicit any donations for the purpose of making a legal challenge.

15. 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. Matthew DePerno
- d. Patrick Byrne
- e. Russell Ramsland
- f. Garrett Ziegler
- g. The person that assisted you in gaining access to the "Antifa call" as described by you on the David K. Clements "The Professor's Record" podcast dated April 20, 2021

None. FEC United had no contact with any of these individuals and has no knowledge of any such communications. FEC United is aware that Joseph Oltmann communicated with Charles Herring through an FEC United email address on one or more occasions, but those communications did not involve FEC business. Mr. Oltmann apparently used that email address as a matter of convenience, as the subject matter was not relevant to FEC.

16. Any retractions you have made with respect to statements regarding Dr. Coomer.

None. FEC United made no such statements.

17. Your standards for journalistic practices, if any, that applied to your broadcasts or publications on the 2020 Presidential election and whether you claim to be a journalist in the first instance (and any facts supporting that contention).

FEC United is a 501(c)(4), and is not a media organization. FEC United made no such broadcasts or publications, and makes no claim to be a media organization or "journalist"

18. Internal communications between your staff members about election fraud coverage and coverage of the January 6, 2020 insurrection.

FEC United is not a media organization and made no "election fraud coverage" or "coverage of the January 6, 2020 insurrection".

19. Your participation, if any, the January 6, 2020 insurrection, or media coverage thereof.

None.

20. Any information regarding your efforts to identify, investigate, or expose members of "Antifa."

None. FEC United's mission: "FEC United promotes the common good and general welfare by (1) teaching and empowering persons and communities to advocate for themselves and providing opportunities for them to participate in civics education and projects; (2) promoting the value of faith, education, and commerce in the United States by taking action to help these societal pillars thrive."

FEC United operates under its mission statement and does not investigate Antifa.

"FEC United is organized and operated exclusively for the promotion of social welfare in accordance with Section 501(c)(4) of the Internal Revenue Code. More specifically, FEC United promotes the common good and general welfare by (1) teaching and empowering persons and communities to advocate for themselves and providing opportunities for them to participate in civics education and projects; (2) promoting the value of faith, education, and commerce in the United States by taking action to help these societal pillars thrive."

21. Any statements you made regarding Dr. Coomer or the Allegations against Dr. Coomer in connection with efforts to establish new chapters of FEC United, expand FEC United's presence in other states or promote FEC United's efforts.

None.

I'm here to answer these 21 questions.

FEC United is organized and operated exclusively for the promotion of social welfare in accordance with Section 501(c)(4) of the Internal Revenue Code. More specifically, FEC United promotes the common good and general welfare by (1) teaching and empowering persons and communities to advocate for themselves and providing opportunities for them to participate in civics education and projects; (2) promoting the value of faith, education, and commerce in the United States by taking action to help these societal pillars thrive.