

<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>Attorneys for Plaintiff Charles J. Cain, No. 51020 ccain@cstrial.com Steve Skarnulis, No. 21PHV6401 skarnulis@cstrial.com Bradley A. Kloewer, No. 50565 bkloewer@cstrial.com Zachary H. Bowman, No. 21PHV6676 zbowman@cstrial.com CAIN & SKARNULIS PLLC P. O. Box 1064 Salida, Colorado 81201 719-530-3011/512-477-5011 (Fax)</p> <p>Thomas M. Rogers III, No. 28809 trey@rklawpc.com Mark Grueskin, No. 14621 mark@rklawpc.com Andrew E. Ho, No. 40381 andrew@rklawpc.com RechtKornfeld PC 1600 Stout Street, Suite 1400 Denver, Colorado 80202 303-573-1900/303-446-9400 (Fax)</p>	<p>Case Number: 2020cv034319</p> <p>Division Courtroom: 409</p>
<p style="text-align: center;">EXHIBIT D-3</p>	

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

DISTRICT COURT, COUNTY OF DENVER,
STATE OF COLORADO

Court Address:
1437 Bannock Street
Denver, CO 80202

^ COURT USE ONLY ^

ERIC COOMER, Ph.D., Case No. 20CV34319
Plaintiff, Courtroom 409

vs.

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

VIDEO VIDEOCONFERENCED DEPOSITION OF THE AUTHORIZED
REPRESENTATIVE OF CD SOLUTIONS, INC. BY JOE OLTMANN
September 9, 2021

1 VIDEOCONFERENCED APPEARANCES:
2 ON BEHALF OF THE PLAINTIFF:
3 BRAD KLOEWER, ESQ.
4 STEVE SKARNULIS, ESQ.
5 ZACH BOWMAN, ESQ.
6 Cain & Skarnulis PLLC
7 P.O. Box 1064
8 Salida, California 81201
9 Phone: 719-530-3011
10 Email: bkloewer@cstrial.com
11 Email: skarnulis@cstrial.com
12 Email: zbowman@cstrial.com
13 ON BEHALF OF THE PLAINTIFF:
14 THOMAS M. ROGERS III (TREY), ESQ.
15 Recht Kornfeld PC
16 1600 Stout Street, Suite 1400
17 Denver, Colorado 80202
18 Phone: 303-573-1900
19 Email: trey@rklawpc.com
20 ON BEHALF OF THE DEFENDANT DONALD J. TRUMP
21 FOR PRESIDENT, INC.:
22 ERIC R. HOLWAY, ESQ.
23 Jackson Kelly PLLC
24 1099 18th Street, Suite 2150
25 Denver, Colorado 80202
Phone: 303-390-0016
Email: eric.holway@jacksonkelly.com

16 ON BEHALF OF THE DEFENDANT DEFENDING THE REPUBLIC:
17 CHRISTOPHER SEERVELD, ESQ.
18 Dymond • Reagor, PLLC
19 8400 East Prentice Avenue, Suite 1040
20 Greenwood Village, Colorado 80111
21 Phone: 303-734-3400
22 Email: cseerveld@drc-law.com

1 VIDEOCONFERENCED APPEARANCES (Cont'd):
2 ON BEHALF OF THE DEFENDANT CHANEL RION And ONE AMERICA
3 NEWS NETWORK:
4 BLAINE KIMREY, ESQ.
5 BRYAN CLARK, ESQ.
6 Vedder Price
7 222 North LaSalle Street
8 Chicago, Illinois 60601
9 Phone: 312-609-7865
10 Email: bkimrey@vedderprice.com
11 Email: bclark@vedderprice.com
12 ON BEHALF OF THE DEFENDANTS CHANEL RION and ONE AMERICA
13 NEWS NETWORK:
14 STEPHEN DEXTER, ESQ.
15 Lathrop GPM LLP
16 1515 Wynkoop Street, Suite 600
17 Denver, Colorado 80202
18 Phone: 720-931-3200
19 Email: stephen.dexter@lathroppgm.com
20 ALSO PRESENT: Shane Ramirez, Videographer
21 Rebecca Dominguez, Veritext

1 VIDEOCONFERENCED APPEARANCES (Cont'd):
2 ON BEHALF OF THE DEFENDANT SIDNEY POWELL AND
3 SIDNEY POWELL PC:
4 BARRY ARRINGTON, ESQ.
5 Arrington Law Firm
6 3801 East Florida Avenue, Suite 830
7 Denver, Colorado 80210
8 Phone: 303-205-7870
9 Email: barry@arringtonpc.com
10 ON BEHALF OF THE DEFENDANTS JOSEPH OLTMANN, FEC UNITED,
11 and SHUFFLING MADNESS MEDIA, INC., d/b/a CONSERVATIVE DAILY:
12 ANDREA M. HALL, ESQ.
13 The Hall Law Office, LLC
14 P.O. Box 2251
15 Loveland, Colorado 80539
16 Phone: 970-419-8234
17 Email: andrea@thehalllawoffice.com
18 ON BEHALF OF THE DEFENDANTS JOSEPH OLTMANN, FEC UNITED,
19 and SHUFFLING MADNESS MEDIA, INC., d/b/a CONSERVATIVE DAILY:
20 INGRID J. DEFRANCO, ESQ.
21 The Law Office of Ingrid J. DeFranco
22 P.O. Box 128
23 Brighton, Colorado 80601
24 Phone: 303-443-1749
25 Email: defrancoi@yahoo.com

16 ON BEHALF OF THE DEFENDANT MICHELLE MALKIN:
17 GORDON QUEENAN, ESQ.
18 Patterson & Ripplinger, PC
19 5613 DTC Parkway, Suite 400
20 Greenwood Village, Colorado 80111
21 Phone: 303-741-4539
22 Email: gqueenan@prpcclegal.com

20 ON BEHALF OF THE DEFENDANT ERIC METAXAS:
21 MARGARET BOEHMER, ESQ.
22 Gordon & Rees
23 555 17th Street, Suite 3400
24 Denver, Colorado 80202
25 Phone: 303-534-5160
Email: mboehmer@grsm.com

1 PURSUANT TO WRITTEN NOTICE and the
2 appropriate rules of civil procedure, the video
3 videoconferenced deposition of the authorized corporate
4 representative of CD Solutions, Inc. by JOE OLTMANN,
5 called for examination by the Plaintiff, was taken
6 remotely, commencing at 12:12 p.m. on September 9, 2021,
7 before Laurel S. Tubbs, a Registered Professional
8 Reporter, Certified Realtime Reporter and Notary Public
9 in and for the State of Colorado.

10 INDEX

11 EXAMINATION:	PAGE
12 By Mr. Skarnulis	8, 66
13 By Ms. Defranco	64

1	EXHIBITS:	PAGE
2	Exhibit 119 Screenshot of Conservative Daily Website	15
3		
4	Exhibit 122 Document from Conservative-Daily	22
5	Exhibit 124 Document Entitled Advocacy to Action	22
6	Exhibit 129 Wayback Machine, Document Entitled Welcome to Advocacy to Action!	20
7	Exhibit 134 Video	34
8	Exhibit 135 Video	36
9	Exhibit 136 Video	40
10	Exhibit 137 Document Entitled Eric Coomer: Pawn, Plant or Perp?	51
11		
12	PREVIOUSLY MARKED EXHIBITS:	PAGE
13	Exhibit 133 Wayback Machine Document	10
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

Page 6

1 JOE OLTSMANN,
2 having been first duly sworn or affirmed, was examined and
3 testified as follows:
4 EXAMINATION
5 BY MR. SKARNULIS:
6 Q. Okay. Please state your full name for the
7 record.
8 A. My name is Joe Oltmann.
9 Q. All right. Mr. Oltmann, you're appearing
10 as a corporate representative for CD Solutions Daily,
11 Incorporated; is that right?
12 A. Yes, I am.
13 Q. What is CD Solutions, Inc.?
14 A. It's a media company.
15 Q. All right. And it was formed in Delaware,
16 right?
17 A. Yes, it was.
18 MS. DOMINGUEZ: And I'm a little -- just
19 go on there. He's like -- and I talked to her, like,
20 before this deposition even started. I told him there
21 were no --
22 THE REPORTER: I'm sorry. I hear a voice
23 speaking.
24 THE DEPONENT: I believe it's Rebecca.
25 MS. DOMINGUEZ: I apologize. It was me.

Page 8

1 PROCEEDINGS
2 THE VIDEOGRAPHER: Here begins the
3 deposition of Joe Oltmann, corporate rep for CD
4 Solutions. Today's date is September 9th, 2021. The
5 time is 1:13 p.m. Central Standard Time. This deposition
6 is being recorded live via Zoom.
7 Will the court reporter please do her read
8 on and swear in the witness.
9 THE REPORTER: One moment.
10 The attorneys participating in this
11 deposition acknowledge that I am not physically present
12 in the deposition room and that I will be reporting this
13 deposition remotely. They further acknowledge that in
14 lieu of an oath administered in person, the witness will
15 verbally declare his testimony in this matter is under
16 penalty of perjury. The parties and their counsel
17 consent to this arrangement and waive any objections to
18 this manner of reporting. Please indicate your agreement
19 by stating your name and your agreement on the record,
20 beginning with the taking attorney.
21 MR. SKARNULIS: Steve Skarnulis for the
22 plaintiff. I agree.
23 MS. DEFRANCO: Ingrid DeFranco for CD
24 Solutions. We agree.
25 ////

Page 7

1 I'm muting myself now.
2 THE DEPONENT: Okay.
3 Q. (By Mr. Skarnulis) Okay. CD Solutions was
4 incorporated in Delaware in 2018; is that correct?
5 A. Yes, it was.
6 Q. And was it formed for the purpose of
7 assuming control of the Conservative Daily brand?
8 A. Anything that had to do with politics
9 specifically or anything that had to do with -- anything
10 that would be controversial. It was basically taking it
11 and moving it away from other business interests
12 completely. Making it separate.
13 Q. Did CD Solutions acquire the Conservative
14 Daily brand from Politizoom, LLC?
15 A. I don't think so.
16 Q. What entity do you think had the
17 Conservative Daily brand prior to CD Solutions?
18 A. I don't remember actually. I can look.
19 Q. No, that's okay.
20 Other than the Shuffling Madness Media, is
21 there another entity that you can think of that had
22 control of the Conservative Daily brand?
23 A. We had PolitiZoom at one point. But I
24 think that was closed in 2017/2018.
25 Q. Okay.

Page 9

1 THE REPORTER: I'm sorry. I didn't hear.
 2 Mr. Oltmann, I didn't hear.
 3 A. I said I'm just looking it up. I'm
 4 looking it up. I'm trying to just go through documents
 5 to make sure I'm completely accurate in what I say.
 6 Q. (By Mr. Skarnulis) What documents are you
 7 looking at, Mr. Oltmann?
 8 A. Dropbox files for anything related to
 9 PolitiZoom.
 10 Q. Well, if you're not able to find it right
 11 away, let's just go by what your recollection is.
 12 Do you recall in the Shuffling Madness
 13 Media deposition right before this, I showed you what I
 14 believe was Exhibit 133, a page from March 2018 from the
 15 Wayback Machine, right?
 16 A. From what day? I'm sorry.
 17 Q. March 2018.
 18 A. Yeah. Yes.
 19 Q. And it had PolitiZoom, LLC. Do you recall
 20 that?
 21 A. Yes.
 22 Q. Okay. Do you recall, did CD Solutions
 23 acquire the Conservative Daily brand and website from
 24 PolitiZoom?
 25 A. I don't show -- I don't have any

Page 10

1 documentation that I can tell you where it was acquired
 2 from.
 3 Q. When CD Solutions took over the
 4 Conservative Daily website, was there any financial
 5 transaction? In other words, did CD Solutions pay to
 6 acquire the brand?
 7 A. I believe so, yes.
 8 Q. Okay. Do you know what entity CD Solutions
 9 paid compensation to?
 10 A. I'm actually looking for that document
 11 right now. So hold that thought.
 12 It looks like they started by setting up
 13 PolitiZoom, and that PolitiZoom then basically just was
 14 swallowed up by CD Solutions. With PolitiZoom, they
 15 started off as an LLC, and that was in mid-2017. And in
 16 2018, in -- I don't know an exact date -- was on
 17 6/12/2018 CD Solutions was formed.
 18 Q. Okay. And was --
 19 A. So there was -- there was a transfer of an
 20 IP in 2017, it appears, to PolitiZoom as an LLC and then
 21 transferred -- it looks like by a suggestion of both our
 22 accountants and our CFO at the time that it should go
 23 into a corporation. And that was in -- on June 12th of
 24 2018.
 25 Q. Okay. And who or what entity controlled

Page 11

1 PolitiZoom?
 2 A. It was a separate entity. It was not
 3 controlled by -- best as I can tell, it was not
 4 controlled by any organization. It was associated with
 5 another organization underneath it called Truth Gear.
 6 THE REPORTER: I'm sorry. One more time.
 7 THE DEPONENT: Truth Gear.
 8 Q. (By Mr. Skarnulis) Okay. And who or what
 9 entity controlled Truth Gear?
 10 A. It was a joint venture between -- I
 11 don't -- I don't show -- I don't have enough information
 12 to go back -- I don't have enough information to go back
 13 that far to figure out who -- who it was between, but it
 14 was between another company and myself.
 15 Q. Okay. Let's -- let's talk specifically
 16 about CD Solutions. It's formed in June of 2018, and it
 17 takes over the Conservative Daily brand.
 18 Does it take any other media businesses
 19 over?
 20 A. Well, it took products. So Advocacy to
 21 Action was a product of CD Solutions. Conservative Daily
 22 is a product of CD Solutions. And then finally,
 23 Conservative Daily podcast is a product of CD Solutions.
 24 Q. And Conservative Daily podcast, as I
 25 appreciate it, started in March of 2020, right?

Page 12

1 A. I believe so, yes.
 2 Q. All right. Who owns CD Solutions?
 3 A. There are multiple partners in CD
 4 Solutions. I'm the largest shareholder.
 5 Q. Okay. What percentage of the shares do you
 6 hold?
 7 A. About 40 percent.
 8 Q. Okay. We've established that Max McGuire
 9 is also a shareholder, right?
 10 A. He is.
 11 Q. And he's your cohost on the podcast, right?
 12 A. Yes.
 13 Q. Does Max have another role with CD
 14 Solutions?
 15 A. He's the advocacy director for
 16 Conservative Daily.
 17 Q. What does the advocacy director for
 18 Conservative Daily do?
 19 A. He advocates for people around the
 20 country. Keeps them informed on what is happening on the
 21 federal level.
 22 MR. KIMREY: Mr. Skarnulis, can I have the
 23 same standing objection -- this is Blaine Kimrey --
 24 speaking related to beyond the scope that we agreed I
 25 could have in the prior two depositions today?

Page 13

<p>1 MR. SKARNULIS: Yeah, Blaine. 2 MR. KIMREY: Thank you. 3 Q. (By Mr. Skarnulis) Okay. Is Max an 4 employee of CD Solutions? 5 A. He's a partner in CD Solutions. 6 Q. Okay. But is he also an employee? 7 A. He's a partner in CD Solutions. 8 Q. Well, does CD Solutions have a payroll? 9 A. It does not have a -- it has an FTE, 10 full-time equivalent, yes. But when you're a partner, 11 you don't get paid as an employee. You get paid as a 12 partner, distributions as a contractor. 13 Q. What I'm asking about is, does Mr. McGuire 14 get compensated outside of his ownership? 15 A. How does this have anything to do with any 16 of this? 17 Q. Well, one of the big issues that has been 18 raised, again recently, is whether CD Solutions -- 19 A. Let's lie, Steve. Let's tell the truth. 20 Let's tell the truth. It wasn't just raised recently. 21 It was raised from the beginning. So let's at least 22 start with the truth. I want to start with the truth. 23 Because your side has a habit of lying, so let's just 24 make sure that we get right to the truth. Okay? 25 Q. Mr. Oltmann, I'd appreciate it if you</p> <p style="text-align: right;">Page 14</p>	<p>1 that sort of thing. 2 A. Yes. 3 Q. CD Solutions would receive that revenue? 4 A. Yes. 5 Q. What about revenue for Advocacy to Action? 6 Would CD Solutions receive that? 7 A. Yes. 8 Q. What about Fax Blasts, does CD Solutions 9 receive revenue from that? 10 A. Yes. 11 THE REPORTER: What was the name again? 12 MR. SKARNULIS: Fax Blasts. 13 THE REPORTER: Thank you. 14 MR. SKARNULIS: Sure. 15 Q. (By Mr. Skarnulis) What about sponsorships 16 like AirMedCare? Does CD Solutions receive the revenue 17 streams from its sponsorships? 18 A. Yes. 19 Q. Same with My Pillow. Does CD Solutions 20 receive revenue for those sponsorships? 21 A. Yes. 22 Q. On 119, scrolling to the bottom here, do 23 you see the copyright at the bottom, Copyright 2021, 24 Conservative Daily? 25 A. Yes.</p> <p style="text-align: right;">Page 16</p>
<p>1 didn't accuse me of lying. 2 A. Well, that would be lying, so I'm going to 3 tell you exactly -- call a lie a lie. Kind of like the 4 post inside of this Facebook that didn't -- that did not 5 exist that was fabricated. That would be a lie too. 6 Q. Okay. Does CD Solutions conduct business 7 in Colorado? 8 A. CD Solutions conducts business all over 9 the country. 10 Q. Does CD Solutions conduct business in 11 Colorado? 12 A. As a part of the 50 states that CD 13 Solutions does business, yes. 14 Q. Okay. I'm sharing my screen. This is 15 marked as Exhibit 119. Does this appear to be a 16 screenshot of the Conservative Daily website? 17 A. Yes. 18 Q. All right. I think I know this, but let me 19 ask. If one were to click on the donate button here. 20 A. Yeah, I see that. Yes. 21 Q. And if someone was to donate, where would 22 those funds flow? 23 A. To CD Solutions. 24 Q. Okay. And same with -- I know the website. 25 There's also a place where you can buy T-shirts, hoodies,</p> <p style="text-align: right;">Page 15</p>	<p>1 Q. Who owns that copyright? 2 A. CD Solutions. 3 Q. When did CD Solutions register for the 4 Conservative Daily copyright? 5 A. It's not actually a requirement to 6 register it when the asset is transferred. And this is 7 Business 101. 8 Q. Okay. I'm going to ask questions. If you 9 can answer them, you can answer them. All right? 10 THE REPORTER: I'm sorry. But, 11 Mr. Skarnulis, you're cutting out and I can't clearly 12 hear you. 13 Q. (By Mr. Skarnulis) Okay. Is there a 14 copyright registered for Conservative Daily? 15 A. I think so, yes. 16 Q. Okay. Who registered the copyright? 17 A. I don't -- I don't recall. 18 Q. When was the copyright registered? 19 A. Some years ago. 20 Q. Do you have any approximation of when the 21 copyright was registered? 22 A. No. There's several ways you can do a 23 copyright. You can, but you also don't have to. You 24 don't have to. You own it by -- 25 THE REPORTER: I'm sorry. You own it by?</p> <p style="text-align: right;">Page 17</p>

1 THE DEPONENT: Use.
2 Q. (By Mr. Skarnulis) Okay.
3 A. I think we have a copyright of some sort.
4 But I think we ran into a copyright issue where other
5 people had used it dating back to 2013 or '14. I'm
6 trying to figure out the company that did that. But --
7 Q. On November 9th, 2021, was CD Solutions,
8 the entity that would have received revenue from the
9 Conservative Daily website?
10 A. Yes.
11 Q. And was that the same entity that would
12 have received revenue from the other revenue streams we
13 just discussed?
14 A. Yeah. Some of those revenue streams did
15 not exist back then.
16 Q. Okay. That's right.
17 At the time, did -- in November of 2020,
18 did the podcast have AirMediCare as a sponsor?
19 A. It had different sponsors. No, it did
20 not.
21 Q. Did the podcast have My Pillow as a
22 sponsor?
23 A. No.
24 Q. Did the podcast have --
25 THE REPORTER: I'm sorry -

Page 18

1 Q. (By Mr. Skarnulis) -- and I
2 believe -- I've seen the number of -- perhaps in Michelle
3 Malkin's interview -- 800 to 1,000 members of Conservative
4 Daily.
5 A. Yeah.
6 Q. I'm sorry. What was that?
7 A. That is accurate.
8 Q. All right. In November of 2020, how many
9 members did Conservative Daily have?
10 A. 800,000.
11 Q. So it has not changed?
12 A. It's actually gone down. So the way we do
13 members is people sign up, they get information from
14 Conservative Daily. And that number has been around
15 800,000 for years.
16 Q. Why do you think the membership has gone
17 down?
18 A. Well, it goes down because you have
19 attrition, and then it goes back up. So it's static.
20 Q. Did you -- did you notice any change in
21 membership with Conservative Daily from November 9th,
22 2020, through the present?
23 A. As far as increases or decreases?
24 Q. Either.
25 A. It stays pretty steady. There's

Page 19

1 no -- again, there's no noticeable change or big increase
2 in memberships. People saw the --
3 (Telephone ringing.)
4 THE REPORTER: I'm sorry. I didn't hear
5 the last portion of your answer.
6 A. There's no noticeable increase as far as
7 people wanting to get information or signing up to be a
8 part of Conservative Daily.
9 Q. (By Mr. Skarnulis) Okay. I'm showing you
10 what's been marked as Exhibit 129. And I'll represent
11 that this was taken from the Colorado Secretary of State's
12 website. You can see that in the upper left-hand corner.
13 And it shows that CD Solutions registered its name as a
14 foreign entity in November of 2018.
15 Do you see that?
16 A. Yes.
17 Q. And then do you see that that name
18 registration expired in January of 2019, right?
19 A. Yes.
20 Q. And at the time -- on November 9th, 2020,
21 CD Solutions did not fix the expiration of its name
22 registration in Colorado, right?
23 A. That's not true. The main place that we
24 operated from was not Colorado. So it would not
25 change -- we would not change this to show registration

Page 20

1 of doing business as a foreign entity because the
2 majority of the business was not done in Colorado.
3 Q. Okay. November 9th, 2020, CD Solutions'
4 name registration would have still expired in Colorado,
5 right?
6 A. The organization is not expired. The
7 registered as a foreign entity is expired.
8 Q. But CD Solutions was doing business in
9 Colorado on November --
10 A. CD Solutions was doing business across the
11 entire country.
12 Q. CD Solutions was doing business in Colorado
13 on November 9th, 2020, right?
14 A. CD Solutions was doing business in all 50
15 states. So the answer to that question would be yes.
16 Q. Okay. Does -- is CD Solutions responsible
17 for the social media of Conservative Daily?
18 A. Max runs social media for Conservative
19 Daily.
20 Q. But does -- is CD Solutions -- is it
21 ultimately responsible for the content of Conservative
22 Daily's social media?
23 A. Yes.
24 Q. Is CD Solutions ultimately responsible for
25 the content on the podcast?

Page 21

1 A. Yes.
2 Q. Just to make sure I'm clear, I know I'm
3 still sharing my screen. This is -- well, what is this?
4 A. I have no idea what that is.
5 Q. You don't recognize this?
6 A. What Exhibit is this?
7 Q. It's Exhibit 124.
8 A. It says it's Advocacy to Action at the
9 bottom page.
10 Q. Copyright 2019, CD Solutions.
11 A. Yes.
12 Q. And what -- what is this Advocacy to Action
13 business on or product --
14 THE REPORTER: I'm sorry, Mr. Skarnulis,
15 could we go off the record a minute?
16 MR. SKARNULIS: Sure.
17 THE VIDEOGRAPHER: Off the record. 1:40
18 p.m.
19 (Discussion off the record.)
20 (Recess from 12:40 p.m. to 12:42 p.m.)
21 THE VIDEOGRAPHER: We're back on the
22 record at 1:42 p.m. Central Standard Time.
23 Q. (By Mr. Skarnulis) Okay. Mr. Oltmann, I'm
24 sharing my screen again. I'm showing you what's been
25 marked. It's Exhibit 122. Can you see that?

Page 22

1 A. I can.
2 Q. All right. And do you recognize
3 Exhibit 122?
4 A. Yeah. It's a fax blast landing page.
5 Q. All right. And is this the method that
6 someone would sign up to send a fax blast to
7 representatives?
8 A. Yes.
9 Q. And looking at the top of Exhibit 122, it
10 says, There are massive discrepancies in the election.
11 Can you see that?
12 A. I do.
13 Q. Did CD Solutions have more than just this
14 one fax blast related to claims of election fraud?
15 A. I don't know.
16 Q. Are you not responsible for the creation of
17 fax blasts?
18 MS. DEFRANCO: Excuse me. Mr. Skarnulis,
19 I have to object at this point. This is not general
20 discovery. And Dominion Voting Systems is not part of
21 the limited discovery. It's not a party in this action.
22 And I don't believe that the Court's parameter discovery
23 order permits this line of inquiry.
24 MR. SKARNULIS: Well, this goes to the
25 financial benefit from allegations against Dr. Coomer,

Page 23

1 which are inherently related to the claims.
2 If you want to instruct him not to answer,
3 that's fine.
4 MS. DEFRANCO: Well, I -- yes, I do
5 instruct him not to answer.
6 THE REPORTER: Ms. DeFranco, I can't
7 understand you.
8 MS. DEFRANCO: I'm sorry.
9 Yes, I'm instructing my client not to
10 answer that line of inquiry. The Court limited this
11 strictly to Dominion Voting Systems as mentioning Eric
12 Coomer.
13 Q. (By Mr. Skarnulis) Has CD Solutions,
14 Mr. Oltmann, produced any fax blasts that mentioned
15 Dr. Coomer?
16 A. I don't think so.
17 Q. Who's responsible for the creation of the
18 fax blasts?
19 A. Everyone on the team at Conservative
20 Daily. I think this was on -- this would have been done
21 by Max McGuire.
22 Q. Who was on the team at Conservative Daily?
23 A. We had several people on the team.
24 Q. Who are they?
25 A. None of your business. I'm not going to

Page 24

1 give you any information that would allow you to dox
2 anyone.
3 Q. Okay. So I can't know who's responsible
4 for what at CD Solutions?
5 A. I just told you who's responsible for
6 that. You asked a question related to that, I gave you
7 an answer.
8 Q. All right. What does Josh do at CD
9 Solutions?
10 A. He doesn't do anything for CD Solutions.
11 Q. What does Mr. Pappas [phonetic] do at CD
12 Solutions?
13 A. He is -- he helps me get people on the
14 show.
15 Q. Does he do anything else?
16 A. He keeps me alive.
17 Q. Anything else?
18 A. That's pretty much it.
19 Q. Okay. As part of -- I'm going to stop my
20 screen share.
21 As part of the allegations that were made
22 on Dr. Coomer, on November 9th, 2020, and beyond, had CD
23 Solutions investigated the claims against Dr. Coomer?
24 A. I'm not sure I understand the question.
25 Q. Okay. We know -- we know your testimony

Page 25

<p>1 individually. But did anyone on the team at CD Solutions</p> <p>2 conduct additional investigation into the allegations</p> <p>3 against Dr. Coomer?</p> <p>4 A. Well, I am the one that runs CD Solutions.</p> <p>5 It's -- I'm the CEO of the organization and, you know,</p> <p>6 it's not a huge organization at all. So I'm the one</p> <p>7 that did all of the examination, you know, looking into</p> <p>8 Eric Coomer specifically.</p> <p>9 Q. Okay.</p> <p>10 A. I'm the one that authorized all the</p> <p>11 podcasts. I'm the one that authorized getting out there</p> <p>12 on Monday. I made that authorization.</p> <p>13 Q. All right. Is there anybody on the team at</p> <p>14 CD Solutions who has experience working in elections or</p> <p>15 election security?</p> <p>16 A. I have extensive experience dealing in</p> <p>17 data and system architecture. So I'm more than capable</p> <p>18 and more than -- I have more than enough experience to</p> <p>19 look into a system -- especially one as -- like the one</p> <p>20 that's used by Dominion, or others.</p> <p>21 Q. Prior to asserting the allegations against</p> <p>22 Dr. Coomer, had you ever worked on data or infrastructure</p> <p>23 related to elections or election security?</p> <p>24 A. No.</p> <p>25 Q. Have you since?</p> <p style="text-align: right;">Page 26</p>	<p>1 performed in your personal capacity, was that important to</p> <p>2 the allegations you made on the Conservative Daily podcast</p> <p>3 and on the website regarding Dr. Coomer?</p> <p>4 A. Conservative Daily podcast was only a</p> <p>5 conduit by which to tell the truth about what happened at</p> <p>6 Dominion Voting Systems and therefore with Eric Coomer.</p> <p>7 Q. Since the --</p> <p>8 THE REPORTER: I'm sorry. Overlapping.</p> <p>9 Repeat please.</p> <p>10 A. It's a platform. A media platform.</p> <p>11 Q. (By Mr. Skarnulis) Okay. Media platform</p> <p>12 ultimately that CD Solutions is responsible for, according</p> <p>13 to you, right?</p> <p>14 A. Yes.</p> <p>15 Q. Has anyone involved with CD Solutions</p> <p>16 considered or evaluated the -- the reports prepared by</p> <p>17 CISA and others finding that the election was free and</p> <p>18 fair?</p> <p>19 A. As in the capacity of Conservative</p> <p>20 Daily -- or say that again. You're going to have to</p> <p>21 repeat that question.</p> <p>22 Q. Yes.</p> <p>23 Has Conservative Daily considered the fact</p> <p>24 that -- well, let me just go down the list -- that Chris</p> <p>25 Krebs with CISA came out and said that the election had no</p> <p style="text-align: right;">Page 28</p>
<p>1 A. Oh, yes.</p> <p>2 Q. Okay. Does anyone with the team at CD</p> <p>3 Solutions have any formal training in mathematics?</p> <p>4 A. Is that a serious question?</p> <p>5 Q. Yes.</p> <p>6 A. Yes.</p> <p>7 Q. Who?</p> <p>8 A. Formal training, meaning -- please --</p> <p>9 please give a little more detail on formal training.</p> <p>10 Q. Formal training, education, experience.</p> <p>11 A. I would say that I have very deep</p> <p>12 knowledge of mathematics. I would say Max McGuire has</p> <p>13 very deep knowledge of mathematics.</p> <p>14 Q. How do you have that knowledge in</p> <p>15 mathematics?</p> <p>16 A. I studied it.</p> <p>17 Q. Where?</p> <p>18 A. Oh, my gosh. What math are you talking</p> <p>19 about?</p> <p>20 Q. Who at CD -- did someone with CD Solutions</p> <p>21 team perform the ARIMA analysis mentioned in your</p> <p>22 affidavit?</p> <p>23 A. No. CD in no capacity did math. I, in my</p> <p>24 personal capacity, did the math.</p> <p>25 Q. Okay. All right. Was the math that you</p> <p style="text-align: right;">Page 27</p>	<p>1 signs of computer fraud?</p> <p>2 A. Chris Krebs also invited Eric Coomer to</p> <p>3 speak at a conference directly a couple years ago. Chris</p> <p>4 Krebs is a lawyer who knows nothing about data, knows</p> <p>5 nothing about code, knows nothing about the election</p> <p>6 systems that he's representing were the safest in</p> <p>7 American history.</p> <p>8 And rather than looking into those</p> <p>9 allegations, Chris Krebs came out less than a week later</p> <p>10 after the election and said there's nothing to see here</p> <p>11 without -- without doing any sort of investigation on the</p> <p>12 credibility of all the witnesses. And I think there was</p> <p>13 probably, what, 10 or 20,000 across the country that</p> <p>14 filed affidavits under penalty of perjury?</p> <p>15 Eric Coomer didn't even sign the original</p> <p>16 complaint. It's not even a verified complaint. So Chris</p> <p>17 Krebs, telling me that there's nothing to see here, holds</p> <p>18 no weight, zero weight on what happened on the election.</p> <p>19 As we're seeing come out of Mesa County,</p> <p>20 where they went in and changed the bios; as we're seeing</p> <p>21 in Antrim County where log file were deleted; as we're</p> <p>22 seeing in Maricopa County where they've been able to do a</p> <p>23 canvass and match up to the information in the report,</p> <p>24 which shows there are massive vulnerabilities inside of</p> <p>25 Dominion Voting Systems and massive issues as it relates</p> <p style="text-align: right;">Page 29</p>

1 to those systems being hooked even to the internet.
 2 So, no, Chris Krebs has no credibility.
 3 He has no credibility, as does many of the people that
 4 are tied to an organization or a company where we don't
 5 even know who owns it.
 6 That should have answered your question.
 7 MR. SKARNULIS: Objection. Nonresponsive.
 8 Q. (By Mr. Skarnulis) I take it that CD
 9 Solutions has -- does not consider CISA -- C-I-S-A -- to
 10 be authoritative when it comes to evaluating the
 11 elections?
 12 A. Well, you do know that CISA did not
 13 actually issue any sort of statement. It was a group, a
 14 board, that is made up and contains both Smartic,
 15 Dominion Voting System, and ES&S, and that that board is
 16 the one -- oh, then you obviously don't -- I mean, based
 17 on your facial expressions, you didn't do your research.
 18 But that board is the one that came back
 19 and said this was the safest election in U.S. history.
 20 True story. I can find it for you if you want me to it
 21 and I can put it up on the screen.
 22 Q. You're aware that that was a joint
 23 statement, right?
 24 A. It was a statement created and crafted by
 25 that board independent of CISA.

Page 30

1 Q. Does CD Solutions not consider attorney
 2 gen- -- then-Attorney General Bill Barr's Department of
 3 Justice evaluation of the election to be authoritative?
 4 A. Please tell me when that -- that statement
 5 was issued by the Department of Justice? And also -- I
 6 don't know if you're aware of this, but Bill Barr himself
 7 actually precluded other attorneys underneath the
 8 Department of Justice from looking into the voter fraud.
 9 As a matter of fact, stood in the way of that, and that
 10 is out there in the internet as well. You can actually
 11 Google it. I think it even still shows up on Google.
 12 Q. Okay. It was December 1st that Attorney
 13 General Barr made the statement that there was no evidence
 14 of election -- of widespread election fraud.
 15 Do you consider that statement to be not
 16 authoritative?
 17 A. I consider that statement to be not
 18 credible based on the mounting evidence around the entire
 19 country of the election fraud that was perpetrated on the
 20 American people and the voice of the American people
 21 being stolen by companies like Dominion Voting Systems
 22 and others.
 23 There's a lack of transparency. We can
 24 talk about -- if you want specifics, I'll get into the
 25 specifics. You want specifics? I'd love to. I mean,

Page 31

1 this would be really good for people to actually hear,
 2 which eventually they will hear.
 3 Q. Do you consider yourself an expert in
 4 election security?
 5 A. No.
 6 Q. Do you consider yourself an expert in the
 7 operation of voting machines?
 8 A. Is this a -- is this a deposition of CD
 9 Solutions? Or is this a deposition of Joe Oltmann?
 10 Because that question would have been relevant yesterday.
 11 It was not relevant today.
 12 Q. Okay. Did your knowledge of voting
 13 machines in any way affect the allegations made on the
 14 Conservative Daily podcast?
 15 A. Conservative Daily podcast is a platform
 16 by which I was a host on a Conservative Daily podcast. I
 17 used that platform in order to get the message out about
 18 the election fraud that existed across your country.
 19 Q. Does CD Solutions contend or believe that
 20 Dr. Coomer had any impact on voting in any particular
 21 county in the US?
 22 A. You're breaking up. You're breaking up.
 23 I'm sorry. I didn't hear any part of that. I don't know
 24 if the court reporter did either.
 25 Q. Does CD Solutions contend that Dr. Coomer

Page 32

1 personally affected the outcome in any particular county
 2 in the US?
 3 A. CD Solutions didn't -- did not, but me, as
 4 the CEO of the company, directed to use the platform to
 5 get the truth out about what happened in the election and
 6 Eric Coomer's probable involvement in that fraud against
 7 the American people.
 8 Q. Give me just a second here. Okay. I'm
 9 going to share my screen with you.
 10 A. I'm -- I'm looking at your billing
 11 statement again.
 12 Q. Oh, geez.
 13 A. Sorry.
 14 Q. I'm sorry. I think I'm clicking on the
 15 right thing.
 16 A. I was going to take another screenshot,
 17 but you didn't have it up there long enough.
 18 Q. There aren't any hours, so...
 19 Can you see the video there?
 20 A. Yes.
 21 Q. Okay.
 22 (Video played.)
 23 Q. And that's a clip from the November 9th,
 24 2020, Conservative Daily podcast, right?
 25 THE REPORTER: I'm sorry. Just a moment.

Page 33

1 Just a moment. I didn't hear what Ms. DeFranco just
2 said.
3 MS. DEFRANCO: Was that exhibit uploaded
4 into the Dropbox or -- or from your cloud?
5 THE DEPONENT: It looks like it, yeah.
6 MR. SKARNULIS: I believe so, yeah.
7 MS. DEFRANCO: Okay. For some reason we
8 didn't get that. I apologize.
9 MR. KIMREY: What exhibit number is this?
10 MR. SKARNULIS: It doesn't have a number
11 on it because it's a video. Let me -- but it is
12 uploaded.
13 MR. KIMREY: Yeah. It should have a
14 number. You can designate it now. I think we're
15 on -- what are we on?
16 MS. DOMINGUEZ: We're on 134.
17 MR. KIMREY: Yeah. So, Mr. Skarnulis, why
18 don't you designate this as 134.
19 MR. SKARNULIS: Okay.
20 Q. (By Mr. Skarnulis) Let me go back to --
21 MR. KIMREY: Would you give us the
22 courtesy of replaying the section you just played?
23 MR. SKARNULIS: Yeah.
24 Rebecca, I'm going to need your help on
25 marking these and putting them into -- I'm going to play
Page 34

1 a few short clips. But I'll --
2 A. It doesn't matter. It's the context. I
3 was walking through how I came to the conclusion, so it
4 doesn't --
5 MR. SKARNULIS: Okay. So this would
6 be -- or will be Exhibit 134.
7 And, Rebecca, it's in -- in our files. I
8 just need it moved to the marked exhibits.
9 And then for Mr. Kimrey, about halfway
10 through; is that right?
11 MR. KIMREY: I don't know where you were
12 in the video, but I'd like for everyone to be able to see
13 the section that you played again.
14 MR. SKARNULIS: Okay. This is
15 Exhibit 134.
16 (Video played.)
17 Q. (By Mr. Skarnulis) Okay. Was -- were you
18 able to hear that, Mr. Oltmann?
19 A. I heard it.
20 Q. Does CD Solutions approve of this content?
21 A. Yes.
22 Q. Did CD Solutions give any consideration to
23 the issue you raised, which is that that might not be
24 Dr. Coomer?
25 A. That's not the context of the entire show.
Page 35

1 The context of the entire show was to build on this, you
2 know, Hey, what if they say this isn't true? So you have
3 to listen to the context of all this. If you'd like to,
4 we can go through the whole thing. We have the time. I
5 think we can watch the whole podcast, right?
6 Q. We're not going to go through the whole
7 thing. I'm going to play just a couple clips.
8 MR. SKARNULIS: This will be marked as
9 Exhibit 135, Rebecca.
10 (Video played.)
11 Q. (By Mr. Skarnulis) Did CD Solutions
12 perform any investigation to determine whether Dr. Coomer
13 actually owned shares in Dominion Voting Systems?
14 A. Did -- Conservative Daily as a company did
15 not.
16 Q. Did you?
17 A. I did.
18 Q. And you determined that Dr. Coomer was a
19 large shareholder of Dominion Voting Systems?
20 A. I was told by someone that was credible
21 that sent me a thing -- I think I provided that in the
22 information that I sent to you. I believe it was
23 researcher, that he is a shareholder in Dominion Voting
24 Systems.
25 Q. Does CD Solutions have any evidence that
Page 36

1 Dr. Coomer was a large shareholder in Dominion Voting
2 Systems?
3 A. Conservative Daily wouldn't have had that,
4 or CD Solutions.
5 Q. Are you being coached by your attorneys to
6 answer some of these questions?
7 A. I'm not.
8 Q. Okay.
9 A. I'm looking at a screen. I can turn it
10 around if you'd like.
11 Q. Sure. What are you looking at?
12 A. I'm looking at a screen.
13 Q. Is there someone on the screen that's
14 assisting you in answering questions?
15 A. No.
16 Q. Okay. Going back to that issue, does
17 conservative -- CD Solutions possess any evidence showing
18 that Eric Coomer is a major shareholder of Dominion Voting
19 Systems?
20 A. That's not what I said. I did not say he
21 was a major shareholder. I said he had lots of shares.
22 THE REPORTER: I'm sorry. One at a time.
23 Q. (By Mr. Skarnulis) Let's watch it again.
24 (Video played.)
25 Q. Okay. Does CD Solutions possess any
Page 37

1 evidence indicating that Eric Coomer has very large
2 amounts of shares in Dominion Voting Systems?
3 A. CD Solutions does not have that
4 information.
5 Q. Do you?
6 A. This deposition is for CD Solutions, not
7 for me.
8 Q. But if you have a personal knowledge of
9 that, that would be something that CD Solutions would
10 have, right?
11 A. No. I am not CD Solutions, nor am I an
12 alter ego of CD Solutions. I run CD Solutions.
13 Q. Well, when it came to making the
14 allegations against Dr. Coomer, who, other than you at CD
15 Solutions, was responsible for investigating the claims?
16 A. I was responsible personally for
17 investigating the claims, and I used CD Solutions for
18 what it is, which is a platform to get the message out
19 about the fraud perpetrated on the American people by
20 Eric Coomer and Dominion Voting Systems.
21 Q. So no one at CD Solutions investigated the
22 claims?
23 A. CD Solutions is a platform. I use that
24 media platform in order to get the truth out about what I
25 personally experienced as it relates to that phone call

Page 38

1 and as it relates to the information I was able to
2 uncover about Mr. Coomer.
3 Q. Okay. But CD Solutions stands by whatever
4 allegations you made regarding Dr. Coomer, right?
5 A. I am the CEO of CD Solutions. I made a
6 decision to use that platform to get the message out
7 there.
8 Q. CD Solutions stands by the allegations made
9 by you and Mr. McGuire regarding Dr. Coomer, right?
10 A. As a CEO of CD Solutions, I stand by the
11 truth that I told about Eric Coomer and Dominion Voting
12 Solutions back in November of 2020, which is
13 collaborated -- or is -- is -- has been bol- -- bolstered
14 by all the evidence that's currently coming out. More
15 evidence that will continue to come out.
16 Q. Is that a Yes?
17 A. I, in the capacity CEO of CD Solutions,
18 100 percent believe that Eric Coomer was involved in the
19 election fraud against the American people.
20 Q. Okay. And you as the CEO, putting on your
21 CEO hat, ratified and approved of whatever allegations
22 have been made on the podcast, right?
23 MS. DEFRANCO: Objection. Calls for a
24 legal conclusion.
25 Q. (By Mr. Skarnulis) You can answer.

Page 39

1 A. Did you get that? Can you repeat the
2 question?
3 Q. Sure. You, as the CEO of CD Solutions,
4 stand by all of the allegations made by you or Mr. McGuire
5 on the Conservative Daily podcast?
6 A. I'm the CEO of Conservative Daily podcast.
7 As a CEO of Conservative Daily podcast, I authorized the
8 information that I had, to put it out there about the
9 truth of Eric Coomer and who he is, and how -- and how it
10 relates to the election fraud against the American people
11 in November of 2020.
12 MR. SKARNULIS: This will be Exhibit 136,
13 Rebecca.
14 (Video played.)
15 Q. Is CD Solutions in possession of any
16 evidence that Dr. Coomer holds shell corporations or
17 offshore corporations?
18 A. CD Solutions does not know.
19 Q. Did CD Solutions perform any type of
20 investigation prior to these allegations being made on the
21 podcast into whether or not Dr. Coomer actually held shell
22 corporations or offshore corporations?
23 A. CD Solutions in its capacity did not, no.
24 Me, in my personal capacity, I did --
25 THE REPORTER: I'm sorry. There was

Page 40

1 overlap. Can you say that again, please.
2 A. So CD Solutions did not. Myself in my
3 personal capacity did, yes. CD is a platform -- CD
4 Solutions is a platform. That platform by which I can
5 get a message out there to many people. So I use that
6 platform to get the truth out about the election fraud
7 that happened on the 3rd of November of 2020.
8 Q. (By Mr. Skarnulis) Does CD Solutions
9 contend that it is a journalism platform?
10 A. It's a news media platform.
11 Q. Okay. Does CD Solutions have standards for
12 the -- the content that is on its podcast?
13 A. Yes.
14 Q. What standards are those?
15 A. To tell the truth.
16 Q. Is there a written guideline?
17 A. To tell the truth?
18 Q. Okay. Is that written anywhere in CD
19 Solutions' records?
20 A. I'm sure it's written somewhere. I mean,
21 it's an -- it's an ethical standard that's kind of novel
22 these days in the media atmosphere. Except for if you're
23 listening to OANN or Newsmax, they tend to tell the truth
24 quite often.
25 Q. Does anyone on the team at CD Solutions

Page 41

1 have any training in journalism?
 2 A. You mean going out there and doing
 3 research on truth and then reporting the truth?
 4 Q. No. I mean, does anybody have any
 5 education as a journalist?
 6 A. I don't -- I don't know what the education
 7 would look like for a journalist. I mean, being able to
 8 write and talk and -- there are plenty of citizen
 9 journalists that are around this country that have done
 10 great things to uncover really bad people and the things
 11 that they have done to everyday Americans.
 12 Q. Is that a No?
 13 A. I'm sorry?
 14 Q. Is that a No?
 15 A. I would say yes. Everyone has experience
 16 in reporting on things that are -- we've been doing this
 17 at Conservative Daily for 11 years, I think, right?
 18 11 years. 12 -- yeah, 10 years, 9 years. A long time.
 19 Q. Does anyone at CD Solutions hold a degree
 20 in journalism?
 21 A. I don't know, actually.
 22 Q. Does anyone at CD Solutions have any
 23 training in journalism ethics that you're aware of?
 24 A. You said journalism or ethics?
 25 Q. Journalism ethics.

Page 42

1 A. Wow. Well, I think we've all read on it.
 2 We watch CNN and we decide what to -- what we should not
 3 do. And then we decide that we don't want to lie so we
 4 move to the other side where we tell the truth. It's
 5 kind of a novel idea. I mean, I don't know how much of
 6 an education you have to have in order to tell the truth.
 7 But we're really good at it.
 8 Q. Has anyone at CD Solutions taken any
 9 courses on journalism ethics?
 10 A. I don't know.
 11 Q. I'm going to share my screen. Well, before
 12 I share my screen.
 13 Can you name any foreign corporations that
 14 Dr. Coomer owns?
 15 A. This is a deposition for CD Solutions. So
 16 I'll answer your questions related to CD Solutions.
 17 Q. Can the CEO of CD Solutions name a single
 18 foreign corporation that Dr. Coomer owns?
 19 A. This is a deposition for CD Solutions. I
 20 will answer any question related to CD Solutions, and
 21 I've answered every question related to CD Solutions.
 22 Q. Are you going to refuse to answer the
 23 question?
 24 A. That's not a question for CD Solutions.
 25 That's a question for me personally. And you had your

Page 43

1 bite at the apple yesterday. So you can have that bite
 2 at the apple again, I guess, if you have extended time
 3 for a deposition, because I think that's what you're
 4 looking for. But under CD Solutions, I've
 5 answered -- I've answered all the questions related to CD
 6 Solutions. And that's what this deposition is about.
 7 Q. You know your attorney has not instructed
 8 you not to answer that question. And I don't believe
 9 under the Rules you get to object to relevance.
 10 THE REPORTER: I'm sorry. But there was
 11 overlap between Ms. DeFranco and you, Mr. Skarnulis, and
 12 I did not get either one.
 13 MS. DEFRANCO: No, there wasn't. I didn't
 14 say anything.
 15 Q. (By Mr. Skarnulis) All right. CD
 16 Solutions published claims that Dr. Coomer owns foreign
 17 companies.
 18 What was the basis for that?
 19 A. The information that they got from an
 20 investigation of people that sent information about Eric
 21 Coomer.
 22 Q. Who did they get the information from?
 23 A. From a gentleman that goes by the
 24 researcher.
 25 Q. No name?

Page 44

1 A. He was pretty anonymous when he started
 2 sending over information. But he was able to provide
 3 information related to Mongolia, related to massive
 4 amounts of travel by Eric Coomer to multiple places. He
 5 was -- he was pretty -- pretty thorough.
 6 Q. Okay. Does the researcher have a name?
 7 A. He did not sign the email, and I did
 8 provide that inside of the discovery.
 9 Q. CD Solutions has published claims that
 10 Dr. Coomer has shell companies.
 11 What is the basis for that?
 12 A. The same information that came from the
 13 researcher, who also provided the information based on a
 14 dossier of Eric Coomer and his illicit activities going
 15 back decades.
 16 Q. Does CD Solutions have evidence of shares
 17 or governmental filings or registrations for any shell
 18 company or foreign company?
 19 A. CD Solutions does not hold any information
 20 related to --
 21 THE REPORTER: Related to? Related to?
 22 THE DEPONENT: Related to this -- related
 23 to this, Eric Coomer.
 24 Q. (By Mr. Skarnulis) CD Solutions has made
 25 claims that Dr. Coomer has shell companies. Can CD

Page 45

1 Solutions name one shell company?
 2 A. CD Solutions is not the one who made the
 3 allegations. It was me in my personal capacity as a
 4 researcher and journalist.
 5 Q. And you're the CEO of CD Solutions, right?
 6 A. I am.
 7 Q. Has anyone at CD Solutions done any
 8 investigation of ?
 9 A. CD Solutions is a platform. I use that
 10 platform as the CEO of that platform in order to put out
 11 a message about what will happen on the 3rd of November
 12 2020.
 13 Q. If we go back to the researcher, is it your
 14 testimony as a representative of CD Solutions that it
 15 published allegations about Dr. Coomer based off the
 16 anonymous claims of a nameless person who sent an
 17 unsolicited email?
 18 A. That's not what happened.
 19 Q. What happened?
 20 A. Well, what you said did not happen. That
 21 was not what happened.
 22 Q. So what happened?
 23 A. Well, CD Solutions is not the one that did
 24 the research. I did. That information came to me from a
 25 researcher outside -- I do believe outside of

Page 46

1 Conservative Daily.
 2 Q. Do you have a Conservative Daily email?
 3 A. I don't. I have -- well, I do under Joe
 4 Otto, but it's not a -- it's a catchall for
 5 info@conservative-daily.com.
 6 Q. Did any email from the researcher come to
 7 that email?
 8 A. I don't recall. I don't think so, but I
 9 don't recall.
 10 Q. CD Solutions has made allegations regarding
 11 Dr. Coomer that are related to statistical or mathematical
 12 analysis --
 13 A. That's not true.
 14 Q. -- is that true?
 15 A. That's not true.
 16 Q. Okay. Have you -- has CD Solutions
 17 disclosed any of the emails from the researcher?
 18 A. I'm sorry. Say that question again.
 19 Q. Has CD Solutions disclosed any emails or
 20 communications from the researcher?
 21 A. The researcher emails were disclosed. I
 22 don't know if they came from FEC United emails or from
 23 Conservative Daily emails.
 24 Q. Have emails indicating or signed by the
 25 researcher been disclosed?

Page 47

1 A. Yes.
 2 Q. Going back to mathematical or statistical
 3 analysis, CD Solutions has -- is not in possession of any
 4 datasets, spreadsheets, or other mathematical analysis of
 5 election results?
 6 A. All right. Say that question again. That
 7 was a mouthful.
 8 Q. Sure.
 9 Is CD Solutions in possession of any
 10 datasets that have been analyzed regarding allegations
 11 made about Dr. Coomer?
 12 A. CD Solutions is not in possession of that
 13 information, no.
 14 Q. How about any spreadsheets or -- or
 15 analysis --
 16 A. No.
 17 Q. -- is it in possession of anything like
 18 that related to Dr. Coomer?
 19 A. CD Solutions is not in possession as a
 20 company of those -- that information, I don't believe.
 21 Q. Regarding the email that you mentioned with
 22 Joe Otto -- first of all, why did you go by the name Joe
 23 Otto for a number of years?
 24 A. Because I don't -- I didn't want any
 25 recognition, and it was about just getting truth out

Page 48

1 there about what was happening across our country.
 2 Q. Have you disclosed any of the -- any of the
 3 emails on that Otto email address?
 4 A. I have.
 5 MR. SKARNULIS: Let's go off the record.
 6 THE VIDEOGRAPHER: Off the record. 2:24
 7 p.m.
 8 (Recess from 1:24 p.m. to 2:10 p.m.)
 9 THE VIDEOGRAPHER: One second. We're back
 10 on the record at 3:11 p.m.
 11 MR. SKARNULIS: Okay. Thank you, Shane.
 12 Before we get started here, I want the record to reflect
 13 that we have discovered that there are no emails from the
 14 researcher Mr. Oltmann has testified about. There are no
 15 emails that we find from Joe Otto account. There are no
 16 emails referring to shell companies or foreign bank
 17 accounts or foreign companies, and these are critical to
 18 understanding the basis for the publications by
 19 Conservative Daily and CD Solutions.
 20 We insist on these documents. We intend
 21 to go back to the Court for a request for further relief
 22 and --
 23 THE DEPONENT: Relief for what? You're
 24 creating a record on something that's not the record.
 25 That's not true. I turned over all the information that

Page 49

1 I was told to turn over and more.
2 MS. DEFRANCO: This is a legal argument.
3 So just --
4 MR. SKARNULIS: I yet to be pointed to a
5 single Bates number that satisfies those areas. I was
6 shown this document -- let me share my screen -- Eric
7 Coomer: Pawn, plant or perp?
8 It reports to be -- well, let me ask the
9 question.
10 Q. (By Mr. Skarnulis) Mr. Oltmann, did you
11 receive this from your researcher?
12 A. I did.
13 Q. Okay. When?
14 A. I don't remember.
15 Q. Was there a transmittal email from the
16 researcher?
17 A. There was.
18 Q. What email address did it go to?
19 A. Joe Otto -- no, it didn't. It went to
20 Joe@FECUnited.com.
21 Q. Okay. I'm in this document under
22 fine -- under -- well, PDF. And if I search for -- if I
23 can spell it correctly -- if I search for researcher, I
24 get mentions of researchers that we all can see, but no
25 signature of that researcher or anything of that kind. I

Page 50

1 take it there is an email that would allow me to
2 understand that there is this anonymous person that email
3 out -- or the researcher out there, right?
4 A. Yes. It's 1001_conservative-daily. That
5 email is inside the discovery.
6 Q. Okay. And that's part of whose production?
7 THE REPORTER: I'm sorry. But I just
8 cannot clearly hear the witness.
9 Q. (By Mr. Skarnulis) Whose production is
10 that part of, Mr. Oltmann?
11 A. It's right there.
12 MS. DEFRANCO: Well, I know. But that
13 doesn't help me.
14 A. It was -- I can show this to you. This
15 was provided as 1001 -- it's in the discovery. It's in
16 the discovery file that I have. That's a mimic to the
17 discovery that you have. It was sent over. It is 1001
18 conservative daily -- dash, daily, underscore. It has an
19 email, and this was -- the chain going back on -- this
20 particular one was sent January 5th, 2021.
21 MR. SKARNULIS: For the record, this Eric
22 Coomer: Pawn, Plant or Perp document that I'm reading
23 from will have -- we'll send to Rebecca for introduction,
24 I believe it's Exhibit 137. It references JODisclosures
25 0081 as the Bates stamp.

Page 51

1 Q. (By Mr. Skarnulis) Mr. Oltmann, if you'll
2 look at my search here for shell in this document, it
3 doesn't turn up anything.
4 Are you testifying that you have a document
5 from the researcher that indicates that Eric Coomer owned
6 shell companies?
7 A. I know that the email -- I need to go back
8 and make sure it's the researcher that gave me that
9 particular information via email. But I do know that
10 that information came from -- I believe the researcher.
11 Let me make sure.
12 Q. That's okay. I don't want to take more
13 time on this if I can't ask -- if I can't take a thorough
14 deposition. I searched in this document, 0081,
15 JODisclosures for foreign --
16 MS. DEFRANCO: It's exactly what you gave
17 there. It's a Bates number, Barry. They're in a file
18 format.
19 THE REPORTER: I'm sorry. But I cannot
20 hear with two people talking.
21 MS. DEFRANCO: It's in the second
22 supplemental disclosures. And I -- they're not
23 Bates numbered because they're all BMG files, and we had
24 no way to Bates number them, but it's there because he
25 just pulled it up for me.

Page 52

1 Yeah. And -- I don't know how to explain
2 what it is, but it's there. I can see it.
3 A. I don't think there's any -- I mean, I
4 don't have any -- I don't have any objection -- excuse
5 me, I'm going to go off -- I'm going to mute for a
6 minute.
7 (Pause.)
8 A. Okay. So that email is in there. I'm
9 actually staring at it. I don't know what you're asking
10 me for as far as the shell company and all that stuff.
11 Q. (By Mr. Skarnulis) You attend -- you
12 attended the hearing on the motion for sanctions, correct?
13 MS. HALL: Steve, what does this have to
14 do with the deposition here with CD Solutions?
15 MR. SKARNULIS: It has to do with document
16 production, Request for Production Number 4 granted
17 discovery into all documents reflecting any investigation
18 you made regarding the allegations about Dr. Coomer.
19 CD Solutions claims to have investigated
20 by receiving emails from the researcher.
21 THE REPORTER: Just a moment, I need this
22 one at a time. I need this one at a time.
23 MR. SKARNULIS: Let me finish.
24 The second supplemental production as was
25 discussed with the Court was illegible and not

Page 53

<p>1 retrievable by our firm's third-party discovery vendor, 2 and the Court ordered that that be rectified. We then 3 received the third supplemental production, which should 4 have disclosed emails from the researcher, emails 5 regarding shell companies and foreign accounts. I don't 6 have them. And I'm -- I'm -- at this time -- well, let 7 me ask one question. 8 (By Mr. Skarnulis) Other than the emails 9 you've identified, Mr. Oltmann, do you have other alias 10 emails that flow to the Conservative Daily email system? 11 A. No. Conservative Daily, CD Solutions, no. 12 Q. I'm prepared to continue with this 13 deposition if I receive the documents that are responsive 14 and have been described. Is it possible to produce those 15 quickly? 16 A. The emails, they're just not ones for CD 17 Solutions. They're FEC United. This is a different 18 deposition. I know I've created chaos inside of this, 19 and that chaos is not related to Conservative Daily or CD 20 Solutions. 21 MR. SKARNULIS: Let's go off the record. 22 THE VIDEOGRAPHER: Did you say go off the 23 record? 24 MR. SKARNULIS: Yes, please. 25 THE VIDEOGRAPHER: Off the record at 3:21 Page 54</p>	<p>1 be published? 2 A. Information we got from credible sources. 3 Q. Including the researcher, right? 4 A. I'm the one that did the research. 5 Conservative Daily, CD Solutions, was the platform by 6 which we got that information -- or pushed that 7 information out to the public. 8 Q. Did CD Solutions have any evidence that 9 Dr. Coomer owned shell corporations? 10 A. CD Solutions was a platform, and I 11 used -- I made a decision and got information from 12 people, and used that information, disseminated, using 13 the platform for Conservative Daily/CD Solutions. 14 Q. You understand that CD Solutions is liable 15 for publications made on its platform if it has not 16 properly vetted them? 17 MS. DEFRANCO: Object. 18 THE REPORTER: I'm sorry. But I cannot 19 hear you. 20 MS. DEFRANCO: I said objection to the 21 legal conclusion. 22 Q. (By Mr. Skarnulis) Have you produced 23 emails from the researcher? 24 A. Yes. 25 Q. Can you provide a Bates number? Page 56</p>
<p>1 p.m. 2 (Recess from 2:21 p.m. to 2:23 p.m.) 3 THE VIDEOGRAPHER: Back on the record at 4 3:23 p.m. 5 Q. (By Mr. Skarnulis) Mr. Oltmann, were you 6 aware that you made allegations regarding Eric Coomer and 7 shell corporations long before you received any emails 8 from the researcher? 9 A. This is a -- this is a deposition on CD 10 Solutions, not of me personally. So you're welcome to 11 ask me any questions about CD Solutions, and I'll answer 12 those questions. 13 Q. As a representative of CD Solutions, did 14 you not testify prior that you relied on what you 15 considered a credible source from the researcher for 16 information about shell companies owned by Eric Coomer? 17 A. You'll have to repeat that question. I'll 18 try to break it down. 19 Q. Allegations were made -- we watched some 20 video just a little while ago -- 21 A. Yes. 22 Q. -- that Eric Coomer owned shell 23 corporations, right? 24 What investigation did CD -- or what was 25 the basis for CD Solutions allowing for that statement to Page 55</p>	<p>1 A. No, no. It's not -- no. I don't even 2 have access to those -- my apologies. 3 THE REPORTER: I'm sorry. I didn't hear 4 you. 5 THE DEPONENT: I do not have access to 6 those Bates numbers. 7 Q. (By Mr. Skarnulis) Have you provided 8 emails or the documents related to Dr. Coomer owning shell 9 corporations? 10 A. I provided all the information under the 11 discovery order that was required under CD Solutions. 12 Q. Did you understand my question? Have you 13 provided documents that evidence that Dr. Coomer owned 14 shell corporations? 15 A. You're asking me a question in my personal 16 capacity. This -- this -- the deposition is for CD 17 Solutions. 18 Q. So you refuse to answer that question? 19 A. The question is a question asked directly 20 at me. It is not directed towards CD Solutions. So if 21 you want to restate the question in a form of whether or 22 not CD Solutions -- because I'm the representative of CD 23 Solutions -- CD Solutions has -- I will definitely answer 24 that question. 25 Q. Earlier you testified that emails came in Page 57</p>

1 through Conservative Daily controlled by CD Solutions that
 2 were relied on as the basis for allegations regarding
 3 shell corporations and Dr. Coomer.
 4 Has CD Solutions produced any such
 5 documents?
 6 A. I don't believe that's what I said.
 7 THE DEPONENT: Court reporter, can you go
 8 back and check that question for me? Can you do that or
 9 not?
 10 MS. DEFRANCO: Don't worry about it.
 11 Q. (By Mr. Skarnulis) She can't go back that
 12 far.
 13 Did CD Solutions, through the Conservative
 14 Daily email system, receive documents and emails from a
 15 person identified as the researcher?
 16 A. Yes. I do believe through -- sorry.
 17 Maybe through Conservative Daily or maybe through FEC
 18 United.
 19 MR. KIMREY: Sorry. What is our running
 20 time? Ms. Tubbs?
 21 THE REPORTER: I have an hour and
 22 27 minutes.
 23 MR. KIMREY: Okay.
 24 THE VIDEOGRAPHER: Give me one second.
 25 I'll look at mine.

Page 58

1 THE REPORTER: I hear people talking, but
 2 I cannot hear what they're saying and we're on the
 3 record.
 4 MR. SKARNULIS: Shane, were you getting us
 5 a time?
 6 THE VIDEOGRAPHER: I have an hour 24.
 7 Roughly the same.
 8 Q. (By Mr. Skarnulis) Did CD Solutions,
 9 through the Conservative Daily email system, receive
 10 emails related to Dr. Coomer having foreign bank accounts?
 11 A. I don't know.
 12 Q. Did CD Solutions, through its email system,
 13 receive documents or emails related to Dr. Coomer owning
 14 shell corporations?
 15 A. I don't know where that information came
 16 in to.
 17 Q. Are you able to produce the emails that
 18 were received on the Joe Otto email address for CD
 19 Solutions?
 20 A. All of those emails have been provided to
 21 you.
 22 Q. How do we determine that they come from
 23 that email address?
 24 A. All emails that came into Conservative
 25 Daily, whether be info@conservative-daily,

Page 59

1 Joeotto@conservative-daily were all funneled into an
 2 account where I can search all emails that came in from
 3 every angle that would have or be pertaining to Eric
 4 Coomer.
 5 Q. I will represent to you that the email
 6 production -- or the document production we have does not
 7 contain anything from that account.
 8 Is it your testimony that the emails as
 9 produced would not reflect the Joe Otto account?
 10 A. The emails that you have that show up
 11 currently at the very top say Joe@conservative-daily.com
 12 as the root account. If you look at the emails that are
 13 provided in there related to Eric Coomer, they come from
 14 Joeotto@conservative-daily.com.
 15 Q. Do you have the Bates numbers of any such
 16 emails that reflect that they're from the Joe Otto
 17 account?
 18 A. I don't have any access to that. You were
 19 supposed to provide me --
 20 THE REPORTER: I'm sorry. I can't hear
 21 you.
 22 A. So you provided me with information that I
 23 will be reviewing today for CD Solutions.
 24 Q. (By Mr. Skarnulis) Okay. My question is:
 25 Have you provided documents in this litigation that would

Page 60

1 evidence coming into the Joe Otto account?
 2 A. I produced every email coming to the Joe
 3 Otto account. That is pertaining to Eric Coomer.
 4 Q. That's not my question. How -- have you
 5 produced documents that would show that; that would say
 6 Joe Otto?
 7 A. Yes, I have.
 8 Q. In the email address?
 9 A. I provided you with screenshots because
 10 the raw files, you could not read. You asked for native
 11 files broken out, so I provided that. Those files could
 12 not be put back together or in their native format
 13 because that's what you asked for, so I took screenshots
 14 as was directed by the Court, where it said to take
 15 screenshots of those emails. I took screenshots of those
 16 email.
 17 Every single one of the emails related to
 18 Eric Coomer from Conservative
 19 Daily -- info@conservative-daily.com or
 20 Joeotto@conservative-daily.com.
 21 And the only difference -- differentiator
 22 was the email I used to get into to look at all of those
 23 root accounts. So your IT people could even tell you
 24 what I'm telling you is accurate.
 25 Q. My question is: Do we have versions that

Page 61

<p>1 we are able to ascertain came to the Joe Otto account? 2 A. All of the emails that came in I provided, 3 came in either from info@conservative-daily.com or 4 through Joeotto@conservative-daily.com. There was never 5 an email of Joeotto@conservative-daily.com. 6 Q. What email address did the researcher use? 7 A. From the email that I'm looking at right 8 now, it shows that it came into contact@FECUnited.com. 9 That was then forwarded to Joe@FECUnited.com. 10 Q. Did the researcher ever email a 11 Conservative Daily address? 12 A. Yes. 13 Q. When? 14 A. The email that we have in discovery 15 dated -- or excuse me, that shows and you've received 16 it -- is 1001_conservative-daily -- -daily_01052021.eml. 17 It was dated and it came into 18 info@conservative-daily.com, and this says on 19 January 5th, 2021, at 5:20 p.m. 20 It was provided in the discovery. The 21 document that I sent over that shows on this document is 22 what I just stated clearly. 23 THE REPORTER: I'm sorry? 24 THE DEPONENT: I'm sorry. 25 Q. (By Mr. Skarnulis) Was that in the second Page 62</p>	<p>1 THE DEPONENT: Can you hold on one second, 2 please. 3 MR. SKARNULIS: Sure. 4 (Pause.) 5 MS. DEFRANCO: Oh, back on the record. 6 THE DEPONENT: We were never off the 7 record. 8 MS. DEFRANCO: So are you -- so, 9 Mr. Skarnulis, what you're telling us is that you're 10 recessing at this time because you think there's 11 something that you don't have that you want to inquire 12 into? 13 MR. SKARNULIS: Yes. 14 MS. DEFRANCO: Okay. So based on that, I 15 have a couple of questions that I'd like a couple 16 clarifications from my client. 17 I want to make sure the court reporter can 18 hear me. 19 THE REPORTER: If you could get closer, 20 please, that would help. 21 MS. DEFRANCO: All right. 22 EXAMINATION 23 BY MS. DEFRANCO: 24 Q. So, Mr. Oltmann, you had email 25 communications with this individual you're calling the Page 64</p>
<p>1 supplemental disclosures? 2 A. Honestly, Steve, I don't know because I 3 don't know what -- there was stuff that was sent in the 4 supplemental discovery that replaced other discovery. I 5 sent over an entire file that gave a full box of all 6 discovery items as requested under the discovery request. 7 Q. Okay. 8 THE REPORTER: I'm sorry. I'm sorry. I'm 9 sorry. I just did not understand. Please start again. 10 A. The email -- the folder that came over, 11 Steve, to you, will be emails, plus attachments. I 12 apologize. That's how I sent it. I don't know if that's 13 how they sent it over to you. 14 MR. SKARNULIS: Okay. At this point I'm 15 going to suspend this deposition and reserve the right to 16 seek additional relief from the Court and potential 17 additional deposition testimony if necessary. 18 The issues at hand concerning the 19 investigation of CD Solutions or Conservative Daily and 20 the veracity of the allegations made about Dr. Coomer is 21 critical to the analysis of liability, including the 22 element of actual analysis, which of course we do not 23 concede is required. So at this time, with that on the 24 record, I'll pass the witness. 25 MS. DEFRANCO: I have nothing. Page 63</p>	<p>1 researcher, correct? 2 A. Not directly, but yes. 3 Q. Okay. Did you have any other sort of 4 communication with the researcher? 5 A. Yes. 6 Q. What sort of communications did you have 7 with the researcher? 8 A. I believe I had a phone call with the 9 researcher. 10 Q. And in what capacity were you acting when 11 you spoke with the researcher on the phone? 12 THE REPORTER: I'm sorry. I can't hear 13 you. 14 THE DEPONENT: Me, as an individual. 15 Q. (By Ms. Defranco) As you sit here today, 16 do you know -- can you tell us for sure where the 17 information that you have regarding the shell companies 18 and offshore accounts came from? 19 A. Not directly. But I turned over all the 20 information that was required underneath the discovery 21 order, and then some. We sifted through that in order to 22 get the information to counsel. 23 Q. So would it necessarily have been an email 24 from the researcher? 25 A. It might have been. Page 65</p>

1 Q. What else might it have been?
2 A. It could have been any number of things.
3 I was given access to different research cites. I was
4 given access to -- which is in the discovery.
5 I was given access to people that -- that
6 had worked for either Dominion or had direct knowledge of
7 Eric Coomer. I was given access to quite a bit of
8 information.
9 MS. DEFRANCO: I think that's all I have.
10 Thank you.
11 EXAMINATION
12 BY MR. SKARNULIS:
13 Q. Who have you talked to at Dominion?
14 MS. DEFRANCO: I thought you were
15 recessed? Do you want to take --
16 MR. SKARNULIS: I want to ask about what
17 you brought up. I don't want a partial disclosure.
18 THE REPORTER: I'm sorry. Can you repeat
19 that, Mr. Skarnulis?
20 MR. SKARNULIS: I do not want a partial
21 disclosure. I want to know who at Dominion have you
22 talked to.
23 MS. DEFRANCO: Where is that in the
24 request for production, please?
25 MR. SKARNULIS: He just testified that he
Page 66

1 talked to somebody from Dominion or more than one. I
2 don't want a partial disclosure for a self-serving
3 deposition follow-up. It's covered by Request for
4 Production Number 4, which involves investigation into
5 the claims.
6 THE REPORTER: I can't hear you. I still
7 can't hear you.
8 MS. HALL: We're not talking to you.
9 We're talking amongst ourselves.
10 MS. DEFRANCO: Just a moment, please.
11 (Sotto voce discussion.)
12 MS. DEFRANCO: Mr. Skarnulis, I'm reading
13 your Request for Production Number 4 which references
14 documents -- all documents reflecting any investigation
15 you made regarding the allegations about Dr. Coomer.
16 MR. SKARNULIS: That's right.
17 Q. (By Mr. Skarnulis) Has CD Solutions
18 provided all the documents relating to any investigation
19 of Dr. Coomer?
20 A. CD Solutions didn't do the investigation.
21 I did the investigation and used CD Solutions as a --
22 THE REPORTER: I'm sorry, but it's just
23 cutting out. I cannot hear you.
24 A. CD Solutions did not do the investigation,
25 I did the investigation related to Eric Coomer and used
Page 67

1 CD Solutions and Conservative Daily as a platform to get
2 that message out.
3 Q. (By Mr. Skarnulis) Subject to my -- well,
4 CD Solutions published it then, didn't they?
5 A. CD Solutions did publish it on the
6 platform, yes.
7 MR. SKARNULIS: Subject to my prior record
8 objection, I pass the witness.
9 MS. DEFRANCO: I have nothing further.
10 Thank you.
11 THE REPORTER: Counsel, any other
12 questions?
13 MR. HOLWAY: This is Eric on behalf of the
14 Trump campaign. I don't have any questions. Thank you.
15 THE REPORTER: Mr. Skarnulis, your order
16 please again?
17 MR. SKARNULIS: I think we've got Etran
18 and video. Whatever it has been standing.
19 THE REPORTER: Mr. Kimrey?
20 MR. CLARK: Mr. Kimrey had to step away,
21 but this is Brian Clark at Vedder Price. And we do not
22 need video for this and regular delivery on the
23 transcript would be fine. Thank you.
24 THE REPORTER: Ms. Boehmer?
25 MS. BOEHMER: I'll take an Etran, regular
Page 68


1 delivery. No video, please.
2 THE REPORTER: Ms. Hall or Ms. DeFranco?
3 MS. DEFRANCO: Yes. We'll do reading and
4 standing, and then standard electronic delivery, please.
5 THE REPORTER: Any other counsel ordering?
6 MR. HOLWAY: This is Eric Holway. I'll
7 just like an Etran, please, no video. Regular delivery
8 is fine. Thank you.
9 THE REPORTER: Hearing none, I will go off
10 the record.
11 THE VIDEOGRAPHER: Really quick, any more
12 orders for videos?
13 Okay. This concludes the deposition of
14 Joe Oltmann, corporate rep for CD Solutions. Off the
15 record 3:49 p.m. Central Standard Time.
16 (Recess from 2:49 p.m. to.
17 * * * * *
18 WHEREUPON, the foregoing deposition was
19 concluded at the hour of 2:49 p.m. Total time on the
20 record was 1 hour and 46 minutes.
21
22
23
24
25
Page 69

1 I, JOE OLTMANN, 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 JOE OLTMANN
 13 Subscribed and sworn to before me this _____
 14 day of _____, 20____.
 15
 16 My commission expires: _____
 17
 18 _____
 19 Notary Public
 20
 21 _____
 22 Address
 23
 24
 25

Page 70

1 Ms. Andrea Hall, Esq.
 2 andrea@thehalllawoffice.com
 3 September 10, 2021
 4 RE: Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.
 5 9/9/2021, CD Solutions, Inc. - Joe Oltmann (#4792308)
 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

Page 72

1 REPORTER'S CERTIFICATE
 2
 3
 4 I, Laurel S. Tubbs, a Registered
 5 Professional Reporter and Notary Public within the State
 6 of Colorado, do hereby certify that previous to the
 7 commencement of the examination, the deponent was duly
 8 sworn by me to testify to the truth.
 9 I further certify that this deposition was
 10 taken in shorthand by me remotely and thereafter reduced
 11 to a typewritten form; that the foregoing constitutes a
 12 true and correct transcript.
 13 I further certify that I am not related
 14 to, employed by, nor of counsel for any of the parties or
 15 attorneys herein, nor otherwise interested in the result
 16 of the within action.
 17 My commission expires September 1, 2023.
 18
 19 
 20 LAUREL S. TUBBS
 21 Registered Professional Reporter,
 22 Certified Realtime Reporter,
 23 and Notary Public
 24 Dated: September 10, 2021
 25

Page 71

1 Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.
 2 CD Solutions, Inc. - Joe Oltmann (#4792308)
 3 E R R A T A S H E E T
 4 PAGE ___ LINE ___ CHANGE _____
 5 _____
 6 REASON _____
 7 PAGE ___ LINE ___ CHANGE _____
 8 _____
 9 REASON _____
 10 PAGE ___ LINE ___ CHANGE _____
 11 _____
 12 REASON _____
 13 PAGE ___ LINE ___ CHANGE _____
 14 _____
 15 REASON _____
 16 PAGE ___ LINE ___ CHANGE _____
 17 _____
 18 REASON _____
 19 PAGE ___ LINE ___ CHANGE _____
 20 _____
 21 REASON _____
 22 _____
 23 _____
 24 CD Solutions, Inc. - Joe Oltmann Date
 25

Page 73

1 Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.

2 CD Solutions, Inc. - Joe Oltmann (#4792308)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, CD Solutions, Inc. - Joe Oltmann, do hereby declare that I

5 have read the foregoing transcript, I have made any

6 corrections, additions, or changes I deemed necessary as

7 noted above to be appended hereto, and that the same is

8 a true, correct and complete transcript of the testimony

9 given by me.

10

11 _____

12 CD Solutions, Inc. - Joe Oltmann Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 _____ DAY OF _____, 20__.

16

17

18

19 _____

NOTARY PUBLIC

20

21

22

23

24

25

Page 74

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.

EXHIBIT 134

Video File

PRESERVED IN NATIVE FORMAT

EXHIBIT 135

Video File

PRESERVED IN NATIVE FORMAT

EXHIBIT 136

Video File

PRESERVED IN NATIVE FORMAT