

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

^ COURT USE ONLY ^

ERIC COOMER, Ph.D.,
Plaintiff,

Case Number 20CV34319

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.,
dba CONSERVATIVE DAILY, JAMES HOFT,
TGP COMMUNICATIONS LLC, dba THE GATEWAY PUNDIT,
MICHELLE MALKIN, ERIC METAXAS, CHANEL RION,
HERRING NETWORKS, INC. dba ONE AMERICA
NEWS NETWORK, and NEWSMAX MEDIA, INC.,
Defendants.

VIDEO-RECORDED REMOTE DEPOSITION OF
JAMES HOFT, individually
and as authorized representative of
TGP COMMUNICATIONS, LLC, dba THE GATEWAY PUNDIT

August 10, 2021

REMOTE APPEARANCES:

FOR THE PLAINTIFF:

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<p>1 REMOTE APPEARANCES (Continued):</p> <p>2 FOR DEFENDANT JAMES HOFT AND TGP COMMUNICATIONS, LLC, dba THE GATEWAY PUNDIT:</p> <p>3 RANDY B. CORPORON, ESQ. Law Offices of Randy B. Corporon, P.C. 4 2821 South Parker Road, Suite 555 Aurora, Colorado 80114 5 Telephone: 303-749-0062 Email: rbc@corporonlaw.com</p> <p>6 JONATHAN C. BURNS, ESQ. 7 P.O. Box 191250 St. Louis, Missouri 63119 8 Telephone: 314-329-5040 Email: tblf@pm.me</p> <p>9 FOR DEFENDANT DONALD J. TRUMP FOR PRESIDENT, INC.:</p> <p>10 JOHN ZAKHEM, ESQ. Jackson Kelly, PLLC 11 1099 Eighteenth Street, Suite 2150 Denver, Colorado 80202 12 Telephone: 303-390-0016 Email: jszakhem@jacksonkelly.com</p> <p>13 FOR DEFENDANTS CHANEL RION and HERRING NETWORKS, INC., 14 dba ONE AMERICA NEWS NETWORK:</p> <p>15 BERNARD J. RHODES, ESQ. BRAD JOHNSON, ESQ. Lathrop GRM LLP 16 1515 Wynkoop Street, Suite 600 Denver, Colorado 80202 17 Telephone: 720-931-3200 Email: bernie.rhodes@lathroppgm.com</p> <p>18 THOMAS M. ROGERS III (TREY), ESQ. 19 Recht Kornfeld, PC 1600 Stout Street, Suite 100 20 Denver, Colorado 80202 Telephone: 303-573-1900 21 Email: trey@rklawpc.com</p> <p>22 FOR DEFENDANT SIDNEY POWELL & SIDNEY POWELL, P.C.:</p> <p>23 BARRY ARRINGTON, ESQ. Arrington Law Firm 3801 East Florida Avenue, Suite 830 24 Denver, Colorado 80210 Telephone: 303-205-7870 25 Email: barry@arringtonpc.com</p>	<p>1 PURSUANT TO WRITTEN NOTICE and the appropriate rules</p> <p>2 of civil procedure, the video-recorded remote deposition</p> <p>3 of JAMES HOFT and TGP COMMUNICATIONS, LLC, dba THE GATEWAY</p> <p>4 PUNDIT, called for examination by Plaintiff, was taken via</p> <p>5 videoconference, commencing at 10:35 a.m. CST, on</p> <p>6 August 10, 2021, before Sara A. Stueve, Registered</p> <p>7 Professional Reporter and Notary Public in and for the</p> <p>8 State of Colorado.</p> <p>9</p> <p>10 I N D E X</p> <p>11 EXAMINATION OF JAMES HOFT: PAGE</p> <p>12 By Mr. Skarnulis 7</p> <p>13 By Mr. Corporon 110</p> <p>14 PLAINTIFF'S DEPOSITION EXHIBITS PAGE</p> <p>15 Exhibit 75 Text correspondence between Joseph Oltmann 74 and James Hoft; June 10, 2020</p> <p>16 Exhibit 76 Text from Jenny Beth Martin introducing 87 James Hoft to Randy Corporon; November 13, 2020</p> <p>18 Exhibit 78 Text from James Hoft to Joseph Oltmann; 89 November 24, 2020</p> <p>19 Exhibit 79 Text from Joseph Oltmann to James Hoft; 90 December 23, 2020</p> <p>21 Exhibit 82 Text from Randy Corporon to James Hoft; 91 November 15, 2020</p> <p>22 Exhibit 83 Text from James Hoft to Randy Corporon; 92 November 16, 2020</p> <p>24 Exhibit 84 Text from Randy Corporon to James Hoft; 92 November 16, 2020</p>
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<p>1 REMOTE APPEARANCES (Continued):</p> <p>2 FOR DEFENDANT ERIC METAXAS:</p> <p>3 MARGARET BOEHMER, ESQ. THOMAS B. QUINN, ESQ. Gordon Rees Scully Mansukhani, LLP 4 555 Seventeenth Street, Suite 3400 Denver, Colorado 80202 5 Telephone: 303-534-5160 Email: mboehmer@grsm.com tquinn@grsm.com</p> <p>6 ERIC P. EARLY, ESQ. Early Sullivan Wright Gizer & McRae, LLP 7 6420 Wilshire Boulevard, Seventeenth Floor Los Angeles, California 90048 8 Telephone: 323-301-4670 Email: eearly@earlysullivan.com</p> <p>9 FOR DEFENDANTS JOSEPH OLTSMANN, FEC UNITED, and 10 SHUFFLING MADNESS MEDIA, INC. dba CONSERVATIVE DAILY:</p> <p>11 ANDREA M. HALL, ESQ. The Hall Law Office, LLC 12 P.O. Box 2251 Loveland, Colorado 80539 13 Telephone: 970-419-8234 Email: andrea@thehalllawoffice.com</p> <p>14 FOR DEFENDANT MICHELLE MALKIN:</p> <p>15 GORDON A. QUEENAN, ESQ. Patterson Ripplinger, P.C. 16 5613 DTC Parkway, Suite 400 Greenwood Village, Colorado 80111 17 Telephone: 303-741-4539 Email: gqueenan@prpclegal.com</p> <p>18 FOR DEFENDANT DEFENDING THE REPUBLIC:</p> <p>19 MICHAEL W. REAGOR, ESQ. Dymond • Reagor, PLLC 20 8400 East Prentice Avenue, Suite 1040 Greenwood Village, Colorado 80111 21 Telephone: 303-734-3400 Email: mreagor@drc-law.com</p> <p>22 Also Present (via videoconference): Rebecca Dominguez, Veritext Case Manager 23 Peter Zierlein, Videographer</p>	<p>1 I N D E X (Continued)</p> <p>2 PLAINTIFF'S DEPOSITION EXHIBITS PAGE</p> <p>3 Exhibit 85 Text from Joseph Oltmann to James Hoft; 94 November 24, 2020</p> <p>4 Exhibit 86 November 13, 2020, article by Jim Hoft: 95 "Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 6 Vendors and Election Officials Have Access to Manipulate the Vote"</p> <p>7 DEFENDANT'S DEPOSITION EXHIBITS PAGE</p> <p>8 Exhibit D Screenshot of "About" page from 113 TheGatewayPundit.com</p> <p>9 Exhibit A Collection of TGP articles mentioned 116 in complaint</p> <p>11 Exhibit E Publication by The Gateway Pundit: 136 12 "Election Fraud and Irregularities in the 2020 US Election"</p>
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<p>1 P R O C E E D I N G S</p> <p>2 * * * * *</p> <p>3 THE VIDEOGRAPHER: Here begins the deposition of</p> <p>4 James Hoft, individually and as a corporate representative</p> <p>5 of TGP Communications. Today's date is August 10, 2021.</p> <p>6 The time is 10:35 a.m.</p> <p>7 Will counsel please identify themselves for the</p> <p>8 record, after which the court reporter will swear in the</p> <p>9 witness.</p> <p>10 MR. SKARNULIS: Steve Skarnulis for the</p> <p>11 plaintiff, Dr. Eric Coomer.</p> <p>12 MR. CORPORON: This is Randy Corporon on behalf</p> <p>13 of Defendants James Hoft and TGP Communications. John</p> <p>14 Burns is on the line as well.</p> <p>15 MR. SKARNULIS: Thank you.</p> <p>16 Before I get started, I wanted to note for the</p> <p>17 record a couple agreements between counsel.</p> <p>18 First of all, yesterday's deposition of the</p> <p>19 Donald J. Trump for President Inc. representative was cut</p> <p>20 short due to some obligations.</p> <p>21 We've reached an agreement to continue that</p> <p>22 after Friday's deposition of Eric Metaxas, which I believe</p> <p>23 starts at 8:30 Eastern Time.</p> <p>24 Secondly, as with our prior depositions, counsel</p> <p>25 have agreed that one objection for defendants counts for</p> <p style="text-align: right;">Page 6</p>	<p>1 to blend my questions. In other words, I'll ask you a</p> <p>2 question individually. If it also needs to apply to the</p> <p>3 entity, I'll clarify that. Does that make sense?</p> <p>4 A. Yes.</p> <p>5 Q. And I think that'll make for a more efficient</p> <p>6 deposition, and we can conclude a little sooner than we</p> <p>7 would in a two-part deposition.</p> <p>8 So have you given a deposition before?</p> <p>9 A. No.</p> <p>10 Q. All right. Just a few basics, then, since this</p> <p>11 is your first time.</p> <p>12 You understand that this is the same as if you</p> <p>13 were giving testimony in the courthouse with the judge and</p> <p>14 the jury?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And you're doing a great job of it. But</p> <p>17 I will need verbal answers from you, so uh-huh, you know,</p> <p>18 head nods, don't work. But -- so if you could continue</p> <p>19 that, that'd be great.</p> <p>20 A. Okay.</p> <p>21 Q. Our deposition with you individually is</p> <p>22 scheduled for three hours. As I said, it may extend a</p> <p>23 little longer to cover some of the entity questions. But</p> <p>24 if you need a break, please just let me know.</p> <p>25 A. Okay.</p> <p style="text-align: right;">Page 8</p>
<p>1 all defendants. And I don't hear any objection to that.</p> <p>2 So with that, I'll proceed.</p> <p>3 JAMES HOFT,</p> <p>4 having been first duly sworn to state the whole truth,</p> <p>5 testified as follows:</p> <p>6 DIRECT EXAMINATION</p> <p>7 BY MR. SKARNULIS:</p> <p>8 Q. Good morning, Mr. Hoft.</p> <p>9 A. Morning.</p> <p>10 Q. My name is Steve Skarnulis. I represent</p> <p>11 Dr. Coomer. Could you start by stating your name for the</p> <p>12 record?</p> <p>13 A. My name is James Hoft.</p> <p>14 Q. And, Mr. Hoft, I understand that today you will</p> <p>15 be appearing both individually and as a corporate</p> <p>16 representative for your company, The Gateway Pundit; is</p> <p>17 that correct?</p> <p>18 A. Yes.</p> <p>19 Q. All right. And were you able to review the</p> <p>20 deposition notice for the corporate representative</p> <p>21 deposition with the categories of topics that we may cover</p> <p>22 today?</p> <p>23 A. Yes.</p> <p>24 Q. All right. Now, with your permission, because I</p> <p>25 understand you're a principal in your business, I will try</p> <p style="text-align: right;">Page 7</p>	<p>1 Q. And if you have any questions about a question</p> <p>2 I've asked, you need a clarification, if you'll let me</p> <p>3 know, I'm always happy to rephrase the question.</p> <p>4 A. Great.</p> <p>5 Q. Is there any reason or impairment that would</p> <p>6 prevent you from properly answering questions today?</p> <p>7 A. No.</p> <p>8 Q. All right. What is your current job?</p> <p>9 A. I am the founder and owner of Gateway Pundit.</p> <p>10 My current position is editor-in-chief, and I also</p> <p>11 contribute as a writer at Gateway Pundit.</p> <p>12 Q. All right. And when did you found The</p> <p>13 Gateway Pundit?</p> <p>14 A. 2004.</p> <p>15 Q. Why did you start Gateway Pundit in 2004?</p> <p>16 A. I felt there was a need for an alternative</p> <p>17 conservative voice online.</p> <p>18 Q. And explain for the jury, if you will, what</p> <p>19 Gateway Pundit is.</p> <p>20 A. Gateway Pundit is currently one of the top</p> <p>21 conservative websites in the country. We started as a</p> <p>22 blog, an opinion blog. And we have grown from two to</p> <p>23 three readers a day to 2.5 million readers a day</p> <p>24 currently.</p> <p>25 Q. Okay. And is The Gateway Pundit still</p> <p style="text-align: right;">Page 9</p>

<p>1 considered a blog, or would you call it something else at 2 this point?</p> <p>3 A. Many people consider it a blog today. We use 4 the same type of format. We get a lot of tips from 5 readers and -- as a blog would. We use opinion as a blog 6 would. And we also report news as a blog would.</p> <p>7 Q. How does The Gateway Pundit distinguish between 8 its opinion pieces and its news pieces?</p> <p>9 A. I may need a clarification on this. As far as 10 what do you mean by "news"?</p> <p>11 Q. Well, you mentioned that there are both opinion 12 pieces; right?</p> <p>13 A. Yes.</p> <p>14 Q. And then you also cover stories; correct?</p> <p>15 A. Yep.</p> <p>16 Q. Is that a yes?</p> <p>17 A. Yes.</p> <p>18 Q. And those stories -- would you consider those 19 news articles?</p> <p>20 A. News with opinion.</p> <p>21 THE REPORTER: Can I interject and ask somebody 22 to please mute? I don't know who that is.</p> <p>23 MS. DOMINGUEZ: Mr. Thorn, could you please 24 mute? Thank you.</p> <p>25 Q. (By Mr. Skarnulis) So you said that it is news Page 10</p>	<p>1 Q. Okay. And prior to The Gateway Pundit, did you 2 work in a science-related field?</p> <p>3 A. Yes, for a period of years.</p> <p>4 Q. And how long did you work in a science-related 5 field?</p> <p>6 A. Probably 13 years.</p> <p>7 Q. And what'd you do -- and what'd you do after 8 that?</p> <p>9 A. Then I worked in human resources.</p> <p>10 Q. Where'd you work in human resources?</p> <p>11 A. At a major corporation based in St. Louis.</p> <p>12 Q. And after that employment, what was your next 13 job?</p> <p>14 A. And then I -- I quit that job and went to -- 15 full-time at The Gateway Pundit.</p> <p>16 Q. Okay. Had you started The Gateway Pundit 17 part-time prior to leaving that human resources job?</p> <p>18 A. Yes.</p> <p>19 Q. All right. Did you have any training in 20 journalism prior to starting The Gateway Pundit?</p> <p>21 A. No.</p> <p>22 Q. Do you have -- did you take any courses, or do 23 you have any educational background in journalism?</p> <p>24 A. I took some -- I went to some seminars on 25 journalism throughout the years. I've attended breakout Page 12</p>
<p>1 with opinion; right?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. Do you -- within your articles that 4 contain both news and opinion, do you attempt to clarify 5 what part is news and what part is opinion?</p> <p>6 A. We leave that up to our readers. But, yes, many 7 times we do.</p> <p>8 Q. And you're an author of some of the pieces; 9 right?</p> <p>10 A. Correct.</p> <p>11 Q. Who are the other authors of pieces at The 12 Gateway Pundit?</p> <p>13 A. We currently have several contributors. The 14 main writers today include my twin brother, Joe Hoft. 15 Our -- one of our editors is Cristina Laila.</p> <p>16 Cassandra Fairbanks is another contributor.</p> <p>17 Jordan Conradson is a contributor from Arizona. Alicia 18 Powe contributes articles.</p> <p>19 We have different organizations that send us 20 articles. We have people who contribute articles 21 through -- through -- through our email, if we choose to 22 use them. So we have guest -- guest articles also.</p> <p>23 Q. What's your educational background?</p> <p>24 A. My background is in science. I have a BS in 25 science, biology. Page 11</p>	<p>1 sessions on journalism, different topics of journalism. 2 I've been to symposiums before in different countries.</p> <p>3 And so I've had some experience since I started 4 the website in 2004.</p> <p>5 Q. Okay. What -- can you name any of the seminars 6 or symposiums you -- you attended related to journalism?</p> <p>7 A. The first -- the first conference where they 8 spoke about journalism would have been in Nashville, 9 Tennessee. I believe that was in 2006. And it was -- I 10 think it was called -- it was a blog -- blogger 11 conference.</p> <p>12 I went to a event in 2007 in Prague, Czech 13 Republic, on dissidence, international dissidence, where 14 I -- I interviewed several dissidents and learned quite a 15 bit about human rights, the different struggles people 16 have.</p> <p>17 Q. Any other seminars or symposiums on journalism 18 that you can recall?</p> <p>19 A. You know, I've gone to several conferences over 20 the years where they talk about what it takes to become 21 successful, what -- what you need to do, how to -- how to 22 interview.</p> <p>23 And that would be like at -- there were some 24 conferences that were named -- they don't have them 25 currently. They were sponsored by -- I believe it was the Page 13</p>

<p>1 Koch brothers, and it was -- I can't recall the name of 2 the conference, but they had them annually.</p> <p>3 Q. Have you attended any conferences, seminars, or 4 symposiums that have dealt with journalism ethics?</p> <p>5 A. I believe there -- over the years, I would say, 6 yes, they talked about journalism ethics.</p> <p>7 Q. Have you personally undertaken any study of 8 journalism ethics?</p> <p>9 A. No, I wouldn't say that.</p> <p>10 Q. Are you or is TGP a member of the Radio 11 Television Digital News Association?</p> <p>12 A. Not currently.</p> <p>13 Q. Were you at one point?</p> <p>14 A. We belonged to different media groups over the 15 past several years. I would have to look that up, which 16 groups we belong to.</p> <p>17 Q. When you say "we," do you mean TGP?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Is it okay if I shorthand it with TGP?</p> <p>20 A. That's fine.</p> <p>21 Q. All right. What -- what groups has TGP been a 22 member of in the past several years?</p> <p>23 A. Yeah, we belong -- I know we were with -- 24 membership with Poynter. We've been in membership with 25 PEN, P-E-N. We've had membership with a couple other</p> <p style="text-align: right;">Page 14</p>	<p>1 that's through Poynter.</p> <p>2 Q. What are some examples of those certified fact 3 check sites?</p> <p>4 A. Obviously, there's several out there. I know of 5 a couple. I guess lead stories would be one. And there 6 are some science websites that are part of this fact check 7 association.</p> <p>8 Q. Why does TGP want to become a fact check site?</p> <p>9 A. We believe that we need more conservative voices 10 out there, not just liberal voices in this community.</p> <p>11 Q. Have you or TGP been a member of the Society of 12 Professional Journalists?</p> <p>13 A. I don't believe so. Don't know.</p> <p>14 Q. How about the National Conference of Editorial 15 Writers?</p> <p>16 A. No.</p> <p>17 Q. The American Society of News Editors?</p> <p>18 A. No.</p> <p>19 Q. Now, with Poynter, I would assume that to be a 20 certified fact checking site, there's some standards that 21 Poynter has that are written that must be satisfied; 22 right?</p> <p>23 A. Correct.</p> <p>24 Q. What, generally, do you understand those 25 standards to be?</p> <p style="text-align: right;">Page 16</p>
<p>1 organizations. I'd have to look that up.</p> <p>2 Q. What is Poynter?</p> <p>3 A. Poynter is a -- I -- I -- I'm not the one -- I'm 4 not an expert on what Poynter is. It's a large 5 corporation, and I know they do fact checks and different 6 things.</p> <p>7 Q. What about PEN? What is that?</p> <p>8 A. We were a member of that for at least a year. 9 And it's an international organization of journalism -- 10 journalists.</p> <p>11 Q. Did PEN have a written set of journalism 12 standards?</p> <p>13 A. I don't know that.</p> <p>14 Q. How about Poynter? Did Poynter have a written 15 set of journalism standards?</p> <p>16 A. We're currently investigating Poynter. We'd 17 also like to become a fact check site. So we -- we know 18 that they have different standards to be a fact check 19 site. And that is something that we -- we're looking at 20 right now.</p> <p>21 Q. When you say "a fact check site," what do you 22 mean by that?</p> <p>23 A. There are some credentialed fact check sites 24 that are out there on the internet that get a 25 certification to become a certified fact check site. And</p> <p style="text-align: right;">Page 15</p>	<p>1 A. Well, I do understand that you need to have a 2 track record, and you need to be doing fact checks for a 3 certain period of time, and that they -- they need to be 4 somehow approved by the Poynter organization. So that's 5 what we're looking at.</p> <p>6 Q. And even without being certified by Poynter, 7 would you say that TGP has tried to build a track record 8 of fact checking?</p> <p>9 MR. BURNS: Steve, this is John Burns. I just 10 wanted to interject here for a moment because -- just so 11 that Mr. Hoft isn't confused and that you're not confused, 12 because I think you guys are talking past each other.</p> <p>13 TGP Communications has set up a separate website 14 called tgpfactcheck.com, which is -- which is a fact -- 15 which is what they're building as a fact check site, not 16 TGP proper, if that makes sense.</p> <p>17 MR. SKARNULIS: That does. Thanks, John.</p> <p>18 That -- that clarified it.</p> <p>19 MR. BURNS: Yes, sir. Thank you.</p> <p>20 Q. (By Mr. Skarnulis) And, Mr. Hoft, with that 21 clarification, are you intending to have two separate 22 sites, one for fact checking and one for the TGP as it's 23 existed presently?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. Have you started the fact checking site?</p> <p style="text-align: right;">Page 17</p>

<p>1 A. Yes.</p> <p>2 Q. Okay. What's your role with fact checking site?</p> <p>3 A. I'm hands off with the fact checking site. I</p> <p>4 may send tips. I may offer suggestions. More of an</p> <p>5 editorial role.</p> <p>6 Q. Okay. Has the fact checking site done any</p> <p>7 investigation or -- or pieces on Eric Coomer?</p> <p>8 A. I don't believe so.</p> <p>9 Q. All right. Let's set the fact checking site</p> <p>10 aside and go back to TGP, Gateway Pundit; okay?</p> <p>11 A. Okay.</p> <p>12 Q. Does The Gateway Pundit have written</p> <p>13 professional standards that it expects its authors to</p> <p>14 comply with?</p> <p>15 A. Yes, we have an About page that discusses who we</p> <p>16 are and what we're about.</p> <p>17 Q. Okay. And that contains also the professional</p> <p>18 standards that you hold your writers to?</p> <p>19 A. I believe so, yes.</p> <p>20 Q. Okay. What, generally, are they, as you</p> <p>21 understand it?</p> <p>22 A. We want to be truthful. We want to be honest.</p> <p>23 We want to be timely. And we want to be trusted.</p> <p>24 Q. Okay. When you say "truthful," in preparing a</p> <p>25 story, what do you expect of a writer for The</p> <p style="text-align: right;">Page 18</p>	<p>1 Q. Does The Gateway Pundit expect its writers to</p> <p>2 consider potential conflicts of interest prior to</p> <p>3 publishing a story?</p> <p>4 A. Sure.</p> <p>5 Q. Is it important for an author for The</p> <p>6 Gateway Pundit to consider opposing facts that may exist?</p> <p>7 A. We've done that. Oh, no, no, no. You're going</p> <p>8 to have to repeat that.</p> <p>9 Q. Well, is it important for a writer, who is going</p> <p>10 to be published in The Gateway Pundit, to consider not</p> <p>11 only one source that -- that they're investigating, but</p> <p>12 other potential sources with opposing facts?</p> <p>13 A. We do that frequently.</p> <p>14 Q. Does The Gateway Pundit have a standard for</p> <p>15 publishing stories that come from anonymous sources?</p> <p>16 A. No, we don't.</p> <p>17 Q. Why not?</p> <p>18 A. We have seen that at other news organizations,</p> <p>19 and we just, you know, don't believe that that's -- it's</p> <p>20 not helpful. We try not to do that.</p> <p>21 We've done it before. But we try to at least --</p> <p>22 we will check out our sources. Some people want to remain</p> <p>23 mon marks, but certainly we check out the source before we</p> <p>24 put anything up.</p> <p>25 Q. Does The Gateway Pundit typically attempt to get</p> <p style="text-align: right;">Page 20</p>
<p>1 Gateway Pundit to do?</p> <p>2 A. For any story?</p> <p>3 Q. Sure. I mean, is there -- is there a basic</p> <p>4 level of investigation that's expected for an author for</p> <p>5 The Gateway Pundit?</p> <p>6 A. Yes.</p> <p>7 Q. What -- what, generally, do you expect for a</p> <p>8 writer of The Gateway Pundit to do by way of investigation</p> <p>9 of a story?</p> <p>10 A. They must confirm that the story is authentic,</p> <p>11 that the source is legitimate, and that the story, of</p> <p>12 course, is something that is -- our audience -- that, you</p> <p>13 know, pertains to our audience.</p> <p>14 Q. And your audience, would it be fair to say, is</p> <p>15 conservative politically?</p> <p>16 A. Yes.</p> <p>17 Q. All right. Now, do you expect your writers,</p> <p>18 when investigating a story, to approach the subject matter</p> <p>19 with impartiality?</p> <p>20 A. Yes, a certain degree, yes.</p> <p>21 Q. When you say "a certain degree," what do you</p> <p>22 mean?</p> <p>23 A. Well, our writers, like any writer on the</p> <p>24 internet today, or on a news organization, has their own</p> <p>25 opinions. But, yes, we -- we would like it to be factual.</p> <p style="text-align: right;">Page 19</p>	<p>1 a response from a person who is the subject of a story it</p> <p>2 publishes?</p> <p>3 A. Yes.</p> <p>4 Q. Did The Gateway Pundit do that with Dr. Coomer?</p> <p>5 A. We reached out to the originator of the piece,</p> <p>6 and that was Joe Oltmann at the time.</p> <p>7 Q. Did you reach out to Dr. Coomer to hear from</p> <p>8 him?</p> <p>9 A. We'd reached out to Dr. Coomer -- well, we've</p> <p>10 reached out to Dominion. I don't believe we've heard back</p> <p>11 from them except in a -- their attorneys at times.</p> <p>12 Q. When did -- and -- and I'm blurring the lines a</p> <p>13 little bit here between you and TGP. When did TGP reach</p> <p>14 out to Dominion for comment?</p> <p>15 A. I'd have to look back. I know we did as</p> <p>16 recently as this past week.</p> <p>17 Q. Did TGP reach out to Dominion for comment prior</p> <p>18 to publishing its first story related to Dominion Voting?</p> <p>19 A. Prior to that, no.</p> <p>20 Q. Did TGP reach out to Dominion for comment prior</p> <p>21 to publishing its first story on Dr. Eric Coomer?</p> <p>22 A. No.</p> <p>23 Q. Why not?</p> <p>24 A. I don't have the access to Eric Coomer. We did</p> <p>25 reach out to the person who wrote the story. Again, I</p> <p style="text-align: right;">Page 21</p>

<p>1 spoke extensively with Joe Oltmann.</p> <p>2 Q. Okay. Why did TGP not reach out to Dr. Coomer</p> <p>3 for his comment?</p> <p>4 A. We were reporting on Joe Oltmann's report.</p> <p>5 That's what we were reporting on. And so we reached out</p> <p>6 to Joe to get his -- what -- what -- the information that</p> <p>7 he had.</p> <p>8 Q. Okay. What was it -- well, I guess, let's --</p> <p>9 let's start at the beginning.</p> <p>10 When did you first learn of Joe Oltmann and his</p> <p>11 story regarding Eric Coomer?</p> <p>12 A. The first time I was aware of Joe was the week</p> <p>13 of -- before our first report, which was November 13th.</p> <p>14 And his story -- his social media was going viral.</p> <p>15 Q. And what was on his social media that drew your</p> <p>16 attention?</p> <p>17 A. He had written extensively on his Twitter</p> <p>18 page about Eric Coomer working with Dominion and different</p> <p>19 things about Dominion Voting Systems.</p> <p>20 Q. And was that the first time you'd heard about</p> <p>21 Eric Coomer?</p> <p>22 A. When I read it at his Twitter page, I believe.</p> <p>23 Q. Had you heard anything about Dominion Voting</p> <p>24 Systems prior to seeing Mr. Oltmann's social media?</p> <p>25 A. Yes.</p> <p style="text-align: right;">Page 22</p>	<p>1 Q. What video did you find?</p> <p>2 A. We found a video from 2016, from Chicago, of</p> <p>3 Eric Coomer speaking to, I believe, perspective buyers of</p> <p>4 the Dominion system, discussing its features of the</p> <p>5 system.</p> <p>6 Q. And what -- what did you learn from that video?</p> <p>7 A. From that video, I believe we found that the --</p> <p>8 the money quote for us was them saying that they can</p> <p>9 bypass -- that the systems could bypass -- and I'd have to</p> <p>10 get the exact quote. But it was something about bypassing</p> <p>11 the -- the users, I believe, who are -- who are -- I -- I</p> <p>12 really need to get the exact quote. I would hate to</p> <p>13 misquote that.</p> <p>14 Q. That's fine. And I'm not here to test your</p> <p>15 memory on that.</p> <p>16 And did -- whatever you saw on that video, did</p> <p>17 that give you concerns about Dominion Voting?</p> <p>18 A. Absolutely.</p> <p>19 Q. Did whatever you saw on that video indicate</p> <p>20 something about Dr. Coomer that gave you concerns?</p> <p>21 A. Yes.</p> <p>22 Q. Why?</p> <p>23 A. I'm sorry. Is it breaking up a little?</p> <p>24 Q. Yeah. You froze up on us there for a second.</p> <p>25 Why did the video give you Dr. --</p> <p style="text-align: right;">Page 24</p>
<p>1 Q. What had you heard?</p> <p>2 A. I believe the first story on Dominion was the</p> <p>3 Antrim County results in Michigan.</p> <p>4 Q. Do you recall approximately when that first came</p> <p>5 to your attention?</p> <p>6 A. That would have been the 4th or 5th.</p> <p>7 Q. And did The Gateway Pundit then publish articles</p> <p>8 about Dominion Voting prior to publishing its first</p> <p>9 article about Eric Coomer?</p> <p>10 A. Yes.</p> <p>11 Q. But, if I understand your previous testimony,</p> <p>12 Gateway Pundit did not reach out to Dominion at that time</p> <p>13 for comment; right?</p> <p>14 A. I'm not sure.</p> <p>15 Q. Okay. After seeing social media posts of</p> <p>16 Joe Oltmann, what did you do next?</p> <p>17 A. I researched Eric Coomer online.</p> <p>18 Q. Did you assign anyone else to help with the</p> <p>19 investigation of Dr. Coomer?</p> <p>20 A. I believe I wrote the first piece on</p> <p>21 Eric Coomer.</p> <p>22 Q. What research did you do online about</p> <p>23 Dr. Coomer?</p> <p>24 A. I looked up Eric Coomer at Dominion and found</p> <p>25 video.</p> <p style="text-align: right;">Page 23</p>	<p>1 A. Uh-oh. Okay.</p> <p>2 Q. Are you with us?</p> <p>3 A. I hear you. Yeah.</p> <p>4 Q. Why did the video you saw give you concerns</p> <p>5 about Dr. Coomer?</p> <p>6 A. It gave me concerns about the Dominion systems,</p> <p>7 the fact that they had said that they were able to bypass</p> <p>8 the -- again, I need to get the exact quote -- but that it</p> <p>9 appeared that they were doing -- they -- they had the</p> <p>10 capability of bypassing the users on the systems and</p> <p>11 inserting, possibly -- I -- you know -- it just -- it</p> <p>12 sounded -- it sounded -- it -- it -- it perked our -- it</p> <p>13 piqued our interest in the fact that the systems were able</p> <p>14 to do things that we did not know they were able to do.</p> <p>15 Q. Okay. Did you do anything to research what it</p> <p>16 was the Dominion Voting machines were able to do?</p> <p>17 A. Yes.</p> <p>18 Q. What'd you do?</p> <p>19 A. Well, we found the actual video. We found the</p> <p>20 transcript. And so we were able to use that as a source</p> <p>21 of the capabilities with the Dominion systems.</p> <p>22 Q. When you say "the transcript," what do you mean?</p> <p>23 A. Talking about -- we were -- it was a transcript</p> <p>24 of what Eric Coomer was saying to the officials in</p> <p>25 Chicago, Illinois.</p> <p style="text-align: right;">Page 25</p>

<p>1 Q. And you understood that to be a sales 2 presentation?</p> <p>3 A. Yes. At the time, yes. Or a training, sales or 4 training, or both.</p> <p>5 Q. Would it make sense to you that if Dominion had 6 a feature that allowed them to somehow change votes, they 7 would publically admit that?</p> <p>8 A. Depends what their motive is.</p> <p>9 Q. What do you think Dominion's motive was?</p> <p>10 MR. BURNS: Objection. Calls for speculation.</p> <p>11 A. I'd hate to speculate.</p> <p>12 Q. (By Mr. Skarnulis) Okay. That's fine.</p> <p>13 All right. So other than the video, what'd you 14 do to -- online to investigate Eric Coomer?</p> <p>15 A. He also had posted his Facebook page items about 16 the Antifa manifesto and his comments -- anti-Trump 17 comments.</p> <p>18 Q. How did you come into possession of those?</p> <p>19 A. So that was posted at Joe Oltmann's Twitter 20 page at the time.</p> <p>21 Q. Did you contact Mr. Oltmann to discuss how he 22 came into possession of those posts?</p> <p>23 A. I contacted Mr. Oltmann on the 14th or 15th and 24 spoke with him.</p> <p>25 Q. Okay. Had you -- well, did you do that prior to</p> <p style="text-align: right;">Page 26</p>	<p>1 Q. (By Mr. Skarnulis) Okay. Prior -- now, let 2 me -- let me confine this -- these questions to prior to 3 publishing your first story about Dr. Eric Coomer, what 4 did you do to investigate him?</p> <p>5 A. That was where we did the search online, and 6 that's where we found video of Dr. Coomer. And that's 7 where we found his training or sales pitch to the Chicago 8 officials.</p> <p>9 Q. And other than the social media post of 10 Mr. Oltmann and the videos you found regarding Dr. Coomer, 11 and also noticing that Dominion had his name at one point 12 on their website and then removed it, what else did you do 13 to investigate Eric Coomer?</p> <p>14 A. Well, we also had done several reports at this 15 time on the Dominion system, I believe.</p> <p>16 Q. Okay. And, of course, those didn't deal 17 specifically with Dr. Coomer, though; right?</p> <p>18 A. Correct.</p> <p>19 Q. Okay. Then other than those stories 20 about Dominion and the prior investigation that we 21 covered, was there anything else you did to learn more 22 about Eric Coomer?</p> <p>23 A. On the 13th, I think that was -- that was about 24 it -- a search online, finding information on him, and 25 then the material that Mr. Oltmann had posted.</p> <p style="text-align: right;">Page 28</p>
<p>1 publishing your first story about Dr. Coomer?</p> <p>2 A. We used his information as a source.</p> <p>3 Q. Well, my question --</p> <p>4 A. So -- so -- so, no, I had not reached out to 5 him. I do know that he had reached out to me, I believe. 6 But I did not know that at the time.</p> <p>7 Q. So you were relying on Joe Oltmann as a source 8 through his social media publications; right?</p> <p>9 A. At the time. And also relying on -- it was -- 10 it was a newsworthy story that was going viral online. 11 And several people were reporting on it, and we -- we 12 posted that this was out there.</p> <p>13 Q. Okay. And we'll look at some of the stories 14 later. I'm just, kind of, getting general background.</p> <p>15 So what -- what else did you do to research 16 Dr. Coomer?</p> <p>17 A. Well, I noticed that his name was on the 18 Dominion website, and that it had been removed from the 19 Dominion website.</p> <p>20 Q. Okay. And what else did you do to investigate 21 Dr. Coomer?</p> <p>22 MR. BURNS: Objection -- one objection, Steve. 23 Could you provide clarification on time, like at what 24 time?</p> <p>25 MR. SKARNULIS: Sure. That's fair.</p> <p style="text-align: right;">Page 27</p>	<p>1 Q. Okay. Now, at what point did you actually first 2 contact Joe Oltmann?</p> <p>3 A. I spoke with him on the 15th, which would have 4 been Sunday night. And we put up that article on the 5 13th, I believe.</p> <p>6 And so I'm not sure when we first spoke, if it 7 was the 14th or the 15th. But then we -- I interviewed 8 Mr. Oltmann on the 15th.</p> <p>9 Q. Okay. Did you speak to him prior to actually 10 formally interviewing him?</p> <p>11 A. I believe we exchanged either text messages -- I 12 believe that's what we did. Could have been on Twitter, 13 direct message.</p> <p>14 As I said, he had tried to contact me before 15 then, but I -- I had not seen that he had reached out to 16 me.</p> <p>17 Q. Okay. In your first conversation with 18 Joe Oltmann, what did the two of you talk about?</p> <p>19 A. So I -- I did an interview -- held an interview 20 with Joe. And it was on Sunday night. I believe it was 21 at least a half hour. I believe it's still posted online.</p> <p>22 And we spoke about his experience in Denver, his 23 experience investigating Antifa, and his experience with 24 what he discovered on Mr. Coomer.</p> <p>25 Q. All right. And in having this interview with</p> <p style="text-align: right;">Page 29</p>

<p>1 Mr. Oltmann, were you assessing his credibility?</p> <p>2 A. Yes.</p> <p>3 Q. What about this conversation with Mr. Oltmann</p> <p>4 made you believe he was a credible source?</p> <p>5 A. Several things. Several things.</p> <p>6 Well, I knew he had spoken with Michelle Malkin,</p> <p>7 a conservative journalist who has an impeccable</p> <p>8 reputation, who is a columnist. And so I knew that had</p> <p>9 happened.</p> <p>10 And I searched a little bit on -- on his -- who</p> <p>11 he was online. And I had looked, like I said, at his</p> <p>12 social media.</p> <p>13 Q. Okay. Did you investigate Mr. Oltmann's</p> <p>14 background at all?</p> <p>15 A. Not extensively.</p> <p>16 Q. During this interview with Mr. Oltmann, did he,</p> <p>17 at that point, relay to you the entire story of his</p> <p>18 alleged infiltration of an Antifa call?</p> <p>19 A. Yes.</p> <p>20 Q. All right. And as you recall it, what,</p> <p>21 generally, did he tell you?</p> <p>22 A. He spoke about the man who was shot dead at the</p> <p>23 protest in Denver by an assailant linked to Antifa who was</p> <p>24 with a local reporter. He said that's what piqued his</p> <p>25 interest.</p> <p style="text-align: right;">Page 30</p>	<p>1 September, but I'm thinking it was October.</p> <p>2 Q. Okay. Now, I'll represent to you that the</p> <p>3 alleged call that Mr. Oltmann infiltrated, where he heard</p> <p>4 Eric from Dominion -- you're familiar with that; right?</p> <p>5 A. Yes.</p> <p>6 Q. And Mr. Oltmann told you all about that;</p> <p>7 correct?</p> <p>8 A. Yes.</p> <p>9 Q. So as I understand it, Mr. Oltmann says that</p> <p>10 that call happened sometime in late September. Were you</p> <p>11 aware of that?</p> <p>12 A. I -- I knew it was sometime in the fall.</p> <p>13 Q. What did Mr. Oltmann tell you about that call?</p> <p>14 A. He said he sat in and was listening, and he</p> <p>15 heard some horrific things, and that he actually had said</p> <p>16 that he took some notes.</p> <p>17 Q. Did you ask to see Mr. Oltmann's notes?</p> <p>18 A. No.</p> <p>19 Q. Why not?</p> <p>20 A. He was telling me everything -- as far as I was</p> <p>21 concerned, he was telling me what he knew at that time.</p> <p>22 Q. As -- were you acting as a journalist in</p> <p>23 interviewing Mr. Oltmann?</p> <p>24 A. Yes.</p> <p>25 Q. As a journalist, wouldn't it be important to</p> <p style="text-align: right;">Page 32</p>
<p>1 And, again, this is all -- this is still</p> <p>2 online -- and -- which I understood because we followed</p> <p>3 that story at The Gateway Pundit. Horrific story that</p> <p>4 didn't get much national play but was a horrific story.</p> <p>5 And we spoke about his infiltration of the</p> <p>6 Antifa group and his sitting in on the call with</p> <p>7 Eric Coomer.</p> <p>8 Q. Okay. When you said "his infiltration of the</p> <p>9 Antifa group," what did Mr. Oltmann tell you about his</p> <p>10 infiltration of the Antifa group?</p> <p>11 A. Mr. Oltmann told me that after this murder, or</p> <p>12 killing, in Denver of the pro-Trump protester, who was</p> <p>13 shot dead blank on the street, that he wanted to find out</p> <p>14 more about what was happening in the community in Denver.</p> <p>15 And he, again, relayed that he was doing a</p> <p>16 research on the Antifa and the media connections. And --</p> <p>17 and -- and he also said that there were several people who</p> <p>18 were involved with this with him, and he said that they</p> <p>19 were researching the groups -- the local Antifa groups.</p> <p>20 Q. Okay. And what -- what time period did you</p> <p>21 understand it that Mr. Oltmann was researching Antifa</p> <p>22 groups?</p> <p>23 A. Well, this -- this killing of this man was, I</p> <p>24 believe, in October, I believe. And so it would have been</p> <p>25 since that time through the election. Might have been</p> <p style="text-align: right;">Page 31</p>	<p>1 corroborate Mr. Oltmann's story?</p> <p>2 A. Yes.</p> <p>3 Q. And wouldn't his notes have provided some</p> <p>4 corroboration?</p> <p>5 A. Among other things.</p> <p>6 Q. What did you do to corroborate Mr. Oltmann's</p> <p>7 story about the Antifa conference call?</p> <p>8 A. Again, I spoke with him directly. I knew that</p> <p>9 he had spoken with -- he had been speaking about this</p> <p>10 incident for several days at that time. And I knew that</p> <p>11 he had already had an interview with, as I said,</p> <p>12 Michelle Malkin, who was very credible.</p> <p>13 Q. Did you ask Mr. Oltmann -- well, hold on. Let</p> <p>14 me back up.</p> <p>15 You've said that twice now, that Ms. Malkin is</p> <p>16 very credible. Why is it you find Ms. Malkin to be very</p> <p>17 credible?</p> <p>18 A. She's very honest. She's extremely intelligent.</p> <p>19 She's been a columnist for 20 or 30 years. She's</p> <p>20 certainly been outspoken in her opinions, and yet she's</p> <p>21 also been very popular with the conservative set.</p> <p>22 Q. Okay. Ms. malkin has a very conservative</p> <p>23 approach to her stories; right?</p> <p>24 A. She's conservative.</p> <p>25 Q. Would you consider Ms. Malkin to be a journalist</p> <p style="text-align: right;">Page 33</p>

<p>1 or an opinion writer?</p> <p>2 MR. BURNS: Object to the form.</p> <p>3 A. She's a journalist and opinion.</p> <p>4 Q. (By Mr. Skarnulis) Okay. A little of both?</p> <p>5 A. She -- she's very well respected, yes.</p> <p>6 Q. Prior to interviewing Mr. Oltmann, did you speak</p> <p>7 with Ms. Malkin to ask her about her interactions with</p> <p>8 him?</p> <p>9 A. I don't recall.</p> <p>10 Q. Did you ever talk to Ms. Malkin about</p> <p>11 Joe Oltmann or the Eric Coomer story?</p> <p>12 A. I don't recall.</p> <p>13 Q. Okay. Do you know -- do you have any idea what</p> <p>14 investigation Ms. Malkin performed before first publishing</p> <p>15 the story about Joe Oltmann and the Antifa conference</p> <p>16 call?</p> <p>17 A. I don't know what research she did.</p> <p>18 Q. Okay. Going back to your interview with</p> <p>19 Mr. Oltmann, did you ask him how it was that he came to</p> <p>20 join this Antifa conference call?</p> <p>21 A. No. He explained that to me.</p> <p>22 Q. What did he tell you?</p> <p>23 A. Again, the transcript or the -- the recording is</p> <p>24 out there. I believe he said it was because he was upset</p> <p>25 about this shooting, and that's why several people had</p> <p style="text-align: right;">Page 34</p>	<p>1 A. I believe he said that some of them -- again, I</p> <p>2 believe he said some of them are anonymous, but I'll --</p> <p>3 I'd have to check back at his exact words on that.</p> <p>4 Q. For any of the names Mr. Oltmann may have</p> <p>5 mentioned, did you attempt to contact those people?</p> <p>6 A. No.</p> <p>7 Q. Why not?</p> <p>8 A. My story was about the -- it was about Oltmann's</p> <p>9 accusations, and I wanted to hear his story. And so I did</p> <p>10 not reach out to any Antifa activists at that time.</p> <p>11 Q. Did you ask Mr. Oltmann for the name of the</p> <p>12 person who gave him access to this call?</p> <p>13 A. No.</p> <p>14 Q. Why not?</p> <p>15 A. I trusted him. He -- he appeared to be a -- a</p> <p>16 credible witness.</p> <p>17 Q. You'd never met Mr. Oltmann prior to speaking</p> <p>18 with him about this; right?</p> <p>19 A. Correct.</p> <p>20 Q. And this story was the first conversation you'd</p> <p>21 ever had with Mr. Oltmann; right?</p> <p>22 A. As far as I know, yeah. I mean, we set it up,</p> <p>23 and I'm not sure exactly -- I don't recall how exactly we</p> <p>24 set it up. I think it was through text message. But as</p> <p>25 far as a conversation, I believe that was our first</p> <p style="text-align: right;">Page 36</p>
<p>1 noticed the, again, coordination between the media and the</p> <p>2 Antifa activists, and that's why he wanted to learn more.</p> <p>3 I believe that's what he told me.</p> <p>4 Q. Now I'm kind of asking you mechanics. Did you</p> <p>5 ask Mr. Oltmann how it was that he got the number or got</p> <p>6 the dial-in for the call?</p> <p>7 A. No. No. And he may have told me that.</p> <p>8 Q. When you say he may have told you, do you have</p> <p>9 any recollection of him telling you that?</p> <p>10 A. Well, he described a bit of his research, so I'd</p> <p>11 have to look back and look exactly at what he said.</p> <p>12 Q. As you sit here today, what is your recollection</p> <p>13 of Mr. Oltmann's research that he described to you?</p> <p>14 A. I felt it was thorough. I felt it was,</p> <p>15 obviously, an explosive story. It was his -- it was his</p> <p>16 story we were reporting on. It was his accusations we</p> <p>17 were reporting on. And it was going viral online. I</p> <p>18 wanted to hear more about it.</p> <p>19 Q. Did you ask Mr. Oltmann the names of any of the</p> <p>20 attendees on this call?</p> <p>21 A. No. No.</p> <p>22 Q. Why not?</p> <p>23 A. He may -- he may have mentioned a couple names,</p> <p>24 but I didn't ask him about the names on the call.</p> <p>25 Q. Why would you --</p> <p style="text-align: right;">Page 35</p>	<p>1 conversation.</p> <p>2 Q. And this first conversation was a phone call?</p> <p>3 A. It was a phone call interview.</p> <p>4 Q. So you were not able to observe Mr. Oltmann's</p> <p>5 demeanor or expressions?</p> <p>6 A. I had seen his -- you know, I've seen, since</p> <p>7 then, his demeanor and expressions. And I don't think we</p> <p>8 did a -- no, we didn't do a video interview. We do</p> <p>9 several of those at Gateway Pundit. I think it was a</p> <p>10 phone conversation.</p> <p>11 Q. Okay. But you were not able to observe</p> <p>12 Mr. Oltmann's demeanor or expressions on the phone; right?</p> <p>13 A. I don't -- I don't recall.</p> <p>14 Q. And you were not able to be shown any documents</p> <p>15 or any supporting evidence that Mr. Oltmann may have been</p> <p>16 in possession of; right?</p> <p>17 A. I included the documents in our initial report</p> <p>18 of Mr. Coomer's Facebook page.</p> <p>19 Q. Okay. And I wasn't referring to those</p> <p>20 documents. I was talking about on this phone call,</p> <p>21 Mr. Oltmann had notes or an email from somebody who got</p> <p>22 him on the Antifa call. Those would have been important</p> <p>23 to see; right?</p> <p>24 A. Well, sure.</p> <p>25 And he had already interviewed with Ms. Malkin,</p> <p style="text-align: right;">Page 37</p>

<p>1 so I -- I had seen how he performed with her, and -- but 2 as far as his notes, I did not see his notes.</p> <p>3 Q. Did you ask Mr. Oltmann whether there was a 4 recording of the call?</p> <p>5 A. I don't recall.</p> <p>6 Q. Did Mr. Oltmann ever tell you that he had a 7 recording of the call?</p> <p>8 A. I don't recall.</p> <p>9 Q. Would it -- would it be important if there had 10 been a recording of the call for you to listen to it to 11 corroborate Mr. Oltmann's story?</p> <p>12 A. Yes.</p> <p>13 Q. Is so, wouldn't that be something that you'd ask 14 Mr. Oltmann to hear?</p> <p>15 A. That makes sense.</p> <p>16 Q. Wouldn't it make sense, if Mr. Oltmann had been 17 able to infiltrate an Antifa conference call, for him to 18 record it?</p> <p>19 A. I don't know what the law is in Colorado.</p> <p>20 Q. Okay. But assuming the law is only one party to 21 a recording needs to be aware of it, you'd agree that it 22 would have made -- it would have been good for Mr. Oltmann 23 to have recorded the call to corroborate his story; right?</p> <p>24 MR. SEERVELD: Object to form. Chris Seerveld. 25 Object to form.</p> <p style="text-align: right;">Page 38</p>	<p>1 have first-person evidence. It -- it's -- it's better to 2 have photos. Adds a lot of credence to your story.</p> <p>3 But if you have a video, it's really -- it's -- 4 it really helps your report when you have, actually, the 5 video of the person doing what you're saying they're 6 doing.</p> <p>7 So, of course, that made for a -- a pretty big 8 story to hear the Dominion top executive talk about how 9 you can access the machines through the internet.</p> <p>10 Q. Did you attempt to reach out to Georgia 11 officials to learn about what you saw on the video about 12 accessing the machines?</p> <p>13 A. I don't recall. I don't believe so.</p> <p>14 Q. Why not?</p> <p>15 A. Well, we've reached out to Georgia officials on 16 numerous reports. I don't know if we did on this report. 17 I don't believe we did.</p> <p>18 This was something that they -- that was 19 previous, and it was something that was recorded. I 20 believe, again, it was either a sales pitch or a training 21 video with Mr. Coomer.</p> <p>22 And I believe -- again, I believe it was 23 Georgia. I really have to look back and see where he was 24 at that point. He had given several trainings around the 25 country -- trainings, sales pitches. And so I -- I'm</p> <p style="text-align: right;">Page 40</p>
<p>1 Q. (By Mr. Skarnulis) And you can go ahead and 2 answer. They'll do that occasionally.</p> <p>3 A. Oh. Okay.</p> <p>4 It would have made the explosive story even more 5 explosive, I think, if there was a recording.</p> <p>6 Q. Okay. And about how long was the interview with 7 Mr. Oltmann? About how long did you talk?</p> <p>8 A. I believe around 30 minutes.</p> <p>9 Q. And after this interview with Mr. Oltmann, did 10 you do anything further to investigate the story?</p> <p>11 A. Well, I did continue to do research on 12 Mr. Coomer.</p> <p>13 Q. Okay. What other research did you do on 14 Dr. Coomer?</p> <p>15 A. I found more video of Dr. Coomer, could have 16 been in Georgia, where he had told individuals that you 17 can access the machines online. And we put up video of 18 that.</p> <p>19 And -- and we've written a few other stories 20 on -- that included Mr. Coomer since then.</p> <p>21 Q. Sure. We'll -- we'll look specifically at the 22 stories a little later. Again, kind of going through 23 background.</p> <p>24 What about the Georgia video got your attention?</p> <p>25 A. Well, again, in reporting, it's -- it's great to</p> <p style="text-align: right;">Page 39</p>	<p>1 thinking it was Georgia, but I can't be exact sure at this 2 point.</p> <p>3 Q. Did you find the video that you saw regarding 4 Georgia -- did you believe that to be incriminating in 5 some way?</p> <p>6 A. Yes.</p> <p>7 Q. Why?</p> <p>8 A. The -- the Dominion executives and on the 9 Dominion web page, they had said that they -- they're not 10 connected to the internet. So when I heard him say that 11 you can have access from the internet to these machines, I 12 felt that that was very -- again, very explosive 13 development.</p> <p>14 Q. Do you know whether it was that the machines are 15 not connected to the internet during the election or ever?</p> <p>16 A. I -- that's not something for me to answer.</p> <p>17 That's -- isn't -- you're asking me to -- if they had the 18 capability; that's what I was reporting on. If they had 19 the -- I'm not going to speculate on that.</p> <p>20 Q. Do you contend that Dominion Voting Systems 21 influenced the outcome of the 2020 presidential election?</p> <p>22 A. We're currently undergoing an investigation, and 23 that's what we want to find out.</p> <p>24 Q. Okay. So you -- you currently do not contend 25 that Dominion Voting Systems influenced the outcome of the</p> <p style="text-align: right;">Page 41</p>

<p>1 election?</p> <p>2 A. Again, we're -- we're investigating currently.</p> <p>3 There's obviously a major symposium going on in</p> <p>4 Sioux Falls, South Dakota, today where -- I don't know</p> <p>5 what's happening. We're on this call. But, possibly,</p> <p>6 information could happen there.</p> <p>7 We -- we are speaking with several witnesses</p> <p>8 still who have access to the Dominion systems. And we --</p> <p>9 so we're waiting to see and to really try to piece this</p> <p>10 all together.</p> <p>11 Q. Who are you speaking to about the Dominion</p> <p>12 systems?</p> <p>13 A. Well, we've written about it, and -- at the</p> <p>14 Gateway Pundit. We have for months. And -- but I'd</p> <p>15 rather not talk about -- I don't know if I -- I'd rather</p> <p>16 not talk about my sources right now, since we're still</p> <p>17 investigating.</p> <p>18 Q. Are you continuing to investigate Dr. Coomer?</p> <p>19 A. If something came up, it -- well, we actually</p> <p>20 reported something on Dr. Coomer a week or two ago. So if</p> <p>21 something comes up, we would report on it, certainly, that</p> <p>22 was newsworthy.</p> <p>23 Q. My question is, are you currently investigating</p> <p>24 Dr. Coomer? And when I say "you," I mean TGP.</p> <p>25 A. Again, if -- "currently investigating" -- I</p> <p style="text-align: right;">Page 42</p>	<p>1 MR. SKARNULIS: We've been going a little over</p> <p>2 an hour. Why don't we take a short break, Mr. Hoft.</p> <p>3 THE WITNESS: Okay. Thank you.</p> <p>4 MR. SKARNULIS: Sure.</p> <p>5 THE VIDEOGRAPHER: Going off the record. The</p> <p>6 time is 11:41.</p> <p>7 (Recess from 11:41 a.m. until 12:11 p.m.)</p> <p>8 THE VIDEOGRAPHER: Back on the record. The time</p> <p>9 is 12:11.</p> <p>10 MR. SKARNULIS: Over -- we just took a break,</p> <p>11 and I want to get on the record, over the break, a number</p> <p>12 of supplemental text messages were produced by counsel for</p> <p>13 Mr. Hoft and TGP.</p> <p>14 I've attempted to get through them as best I</p> <p>15 can, and I anticipate that I will be able to cover all</p> <p>16 these within today's time. And I'll do my best to do</p> <p>17 that. But I need to reserve, in case something comes up</p> <p>18 that -- regarding those exhibits that I may need</p> <p>19 additional time. But, again, I don't anticipate that.</p> <p>20 All right --</p> <p>21 MR. CORPORON: And, Steve, I'd like to address</p> <p>22 those very briefly myself.</p> <p>23 MR. SKARNULIS: Sure.</p> <p>24 MR. CORPORON: I just want to make clear,</p> <p>25 there's 31 texts, I believe. There's a couple from May or</p> <p style="text-align: right;">Page 44</p>
<p>1 mean, we'll continue to follow the story, new</p> <p>2 developments. But do we have a staff who are just</p> <p>3 assigned to the Eric Coomer story? No.</p> <p>4 Q. Do you contend that Dr. Coomer influenced the</p> <p>5 outcome of the 2020 presidential election?</p> <p>6 A. We've never said that.</p> <p>7 Q. And that's not my question.</p> <p>8 My question is, do you believe that Dr. Coomer</p> <p>9 influenced the outcome?</p> <p>10 A. We believe that's possible.</p> <p>11 Q. How do you believe that Dr. Coomer possibly</p> <p>12 influenced the outcome of the election?</p> <p>13 A. Again, we're still in investigation. It's been</p> <p>14 several months, but there's still information that's being</p> <p>15 released and released this week.</p> <p>16 And so once we have more information, I believe</p> <p>17 we could continue to follow this story and see where it</p> <p>18 leads us.</p> <p>19 Q. Is it typically The Gateway Pundit's practice to</p> <p>20 publish a story with pretty shocking allegations prior to</p> <p>21 confirming whether those allegations are true?</p> <p>22 A. I'd say no. I think we're -- we do a very</p> <p>23 effective job with our reporting.</p> <p>24 MR. ZAKHEM: This is John Zakhem. I object to</p> <p>25 form on the last question.</p> <p style="text-align: right;">Page 43</p>	<p>1 June that do not specifically reference Eric Coomer, so</p> <p>2 they didn't come up in the search that was done by --</p> <p>3 excuse me -- the organization that was hired by John Burns</p> <p>4 to perform the search.</p> <p>5 And then the recent ones that refer to Saturday</p> <p>6 or Thursday are new texts that we became aware of, and</p> <p>7 that occurred after Mr. Hoft published a couple of news</p> <p>8 stories regarding Eric Coomer. So we became aware of</p> <p>9 those last night.</p> <p>10 We talked about getting them to you this</p> <p>11 morning, and then we just plain forgot. So apologies on</p> <p>12 that.</p> <p>13 Except for those May and June that didn't refer</p> <p>14 to Coomer, all of the others would be supplemental, just</p> <p>15 newly acquired.</p> <p>16 MR. SKARNULIS: Okay. Thanks for that.</p> <p>17 Q. (By Mr. Skarnulis) All right. Mr. Hoft, are</p> <p>18 you ready to proceed?</p> <p>19 A. Yes.</p> <p>20 Q. You have never met Eric Coomer, have you?</p> <p>21 A. Correct.</p> <p>22 Q. You've never talked to him, have you?</p> <p>23 A. Correct.</p> <p>24 Q. You did not participate in the alleged Antifa</p> <p>25 call; right?</p> <p style="text-align: right;">Page 45</p>

<p>1 A. Correct.</p> <p>2 Q. You don't know the identity of any of the</p> <p>3 participants on the call; right?</p> <p>4 A. Just Joe Oltmann.</p> <p>5 Q. Fair enough.</p> <p>6 And did you ask Mr. Oltmann whether he</p> <p>7 recognized Eric Coomer's voice when he later saw a video</p> <p>8 of Dr. Coomer?</p> <p>9 A. No. But -- but I believe he has said that on --</p> <p>10 on the record somewhere, that he felt it was the same</p> <p>11 voice.</p> <p>12 Q. Okay. Did you know that prior to publishing</p> <p>13 your first story about Dr. Coomer?</p> <p>14 A. No.</p> <p>15 Q. You have no evidence that Dr. Coomer interfered</p> <p>16 with the 2020 presidential election; right?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. And you ultimately relied on Joe Oltmann</p> <p>19 as TGP's source for your reporting on Dr. Coomer; right?</p> <p>20 A. Correct.</p> <p>21 Q. And at the time you published articles about</p> <p>22 Dr. Coomer involving Joe Oltmann, were you aware that</p> <p>23 Oltmann was a conservative podcast host?</p> <p>24 A. He told me that at some point in our first</p> <p>25 interview.</p> <p style="text-align: right;">Page 46</p>	<p>1 A. No.</p> <p>2 Q. Prior to publishing your first story about</p> <p>3 Dr. Coomer, were you aware that Mr. Oltmann had made</p> <p>4 allegations of election fraud about the 2020 election?</p> <p>5 A. No.</p> <p>6 Q. Prior to publishing your story about -- your</p> <p>7 first story about Dr. Coomer, were you aware that</p> <p>8 Joe Oltmann, on his podcast, had discussed the possibility</p> <p>9 of election fraud prior to November 3rd?</p> <p>10 A. No.</p> <p>11 Q. Wouldn't that have been important to know?</p> <p>12 A. It was more information.</p> <p>13 Q. Well, isn't it possible that Mr. Oltmann, on his</p> <p>14 podcast, had alleged election fraud and then created a</p> <p>15 story about Dr. Coomer to support that?</p> <p>16 MR. CORPORON: Objection as to form. Anything's</p> <p>17 possible.</p> <p>18 A. I don't -- I don't want to speculate on that. I</p> <p>19 don't know what was going through his head.</p> <p>20 Q. (By Mr. Skarnulis) Prior to hearing</p> <p>21 Joe Oltmann's story about the alleged Antifa conference</p> <p>22 call, had you ever heard of Antifa members participating</p> <p>23 in a conference call?</p> <p>24 A. Yes.</p> <p>25 Q. When?</p> <p style="text-align: right;">Page 48</p>
<p>1 Q. Okay. Did he tell you that he had an ownership</p> <p>2 interest in the conservative podcast?</p> <p>3 A. No.</p> <p>4 Q. Were you aware that he could have financially</p> <p>5 benefited from statements made on his podcast?</p> <p>6 A. No.</p> <p>7 Q. Were you aware prior to publishing stories about</p> <p>8 Dr. Coomer that Joe Oltmann was a vocal supporter of</p> <p>9 former President Trump?</p> <p>10 A. Not specifically, no.</p> <p>11 Q. Prior to publishing stories about Dr. Coomer,</p> <p>12 were you aware that Joe Oltmann, through his organization</p> <p>13 FEC United, held rallies in support of former</p> <p>14 President Trump?</p> <p>15 A. No.</p> <p>16 Q. Were you aware that Joe Oltmann had raised funds</p> <p>17 in support of former President Trump?</p> <p>18 A. No.</p> <p>19 Q. Prior to publishing your first stories about</p> <p>20 Dr. Coomer, did you know anything about Joe Oltmann's</p> <p>21 organization, FEC United?</p> <p>22 MR. BURNS: Object to form. John Burns.</p> <p>23 MR. SKARNULIS: That's fine.</p> <p>24 Q. (By Mr. Skarnulis) And you can go ahead and</p> <p>25 answer.</p> <p style="text-align: right;">Page 47</p>	<p>1 A. We've reported on Antifa activities for years,</p> <p>2 and we've reported on -- their activities include planning</p> <p>3 and carrying out different activities.</p> <p>4 I know we have one reporter who was also</p> <p>5 harassed at her home by Antifa, and she had access to</p> <p>6 some -- some information that wasn't public that they had</p> <p>7 been planning -- you know, when they were planning. And</p> <p>8 she -- she ended up moving from her house because the</p> <p>9 violent threats she was receiving.</p> <p>10 Q. Okay. But have you -- had you previously</p> <p>11 reported about Antifa conference calls?</p> <p>12 A. A conference call? Maybe not a conference call.</p> <p>13 Q. Any Antifa meetings? Have you reported on</p> <p>14 those?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. When?</p> <p>17 A. We've reported hundreds of articles on Antifa.</p> <p>18 We've reported, maybe, a hundred thousand articles at</p> <p>19 Gateway Pundit over the years. So we've reported on</p> <p>20 Antifa activities.</p> <p>21 Q. Were you aware of any instance in which</p> <p>22 Joe Oltmann mentioned the alleged Antifa conference call</p> <p>23 prior to the election?</p> <p>24 A. No.</p> <p>25 Q. Are you aware of any instance in which</p> <p style="text-align: right;">Page 49</p>

<p>1 Joe Oltmann mentioned the alleged Antifa conference call 2 prior to November 9, 2020? 3 A. No. 4 Q. Did you ask Mr. Oltmann, in reporting on his 5 story, whether or not he knew any of the other 6 participants on the conference call? 7 A. No. 8 Q. Do you know whether Joe Oltmann alleges that 9 Dr. Coomer influenced the outcome of the 2020 presidential 10 election? 11 MS. HALL: Andrea Hall. Object to form. 12 A. I'm not aware of that. 13 Q. (By Mr. Skarnulis) Do you know of any theory 14 Mr. Oltmann had on how Eric Coomer could have influenced 15 the 2020 presidential election? 16 MS. HALL: Andrea Hall. Object to form. 17 A. No. 18 Q. (By Mr. Skarnulis) Do you have a working theory 19 as to how Dr. Eric Coomer could have influenced the 20 outcome of the 2020 presidential election? 21 MR. BURNS: John Burns. Object. Calls for 22 speculation. 23 Q. (By Mr. Skarnulis) And you can go ahead and 24 answer. Do you have a working theory of how that might 25 have happened?</p> <p style="text-align: right;">Page 50</p>	<p>1 presidential election were fraudulent? 2 A. Prior to Coomer? 3 Q. Yes, sir. 4 A. The president had said it was -- the executive 5 branch had said it was a fraudulent election, something he 6 still considers. 7 Q. Okay. Other than the president, were you aware 8 of a federal governmental body that had determined the 9 results of the 2020 presidential election were fraudulent? 10 A. We -- no, not a government body. 11 Q. Were you aware before you published your first 12 story about Dr. Coomer that the Cybersecurity and 13 Infrastructure Security Agency reported on 14 November 12, 2020, there was no evidence that the 2020 15 presidential election was fraudulent? 16 A. We reported on that. 17 Q. Did you disagree with that conclusion of CISA? 18 A. Yes. 19 Q. Why? 20 A. We did not believe it was a thorough 21 investigation. 22 Q. You were aware that Chris Krebs was the one who 23 was the head of CISA; right? 24 A. Absolutely. 25 Q. And you were aware that he had been appointed by</p> <p style="text-align: right;">Page 52</p>
<p>1 A. We're still investigating, as I said. And we're 2 open to all of the evidence. 3 And, obviously, some evidence we see we -- we 4 turn away. And -- but we're still investigating what 5 happened at the 2020 election. 6 Q. Okay. Do you have currently a working theory as 7 to how Eric Coomer could have affected the outcome of the 8 2020 election? 9 MR. BURNS: John Burns. Same objection. 10 A. I'd say no. 11 Q. (By Mr. Skarnulis) Okay. What -- you said you 12 turned away some evidence regarding your investigation of 13 Dr. Coomer. What evidence have you turned away? 14 A. Well, we've turned away evidence pertaining to 15 the election. Some people give us stories. We receive a 16 lot of information from readers. And we have to be 17 selective with what we're going to report on. 18 So, yes, we've turned away some information. 19 I -- I would not say that it was pertaining to Dr. Coomer, 20 but certainly to -- to some elections. I'd say some of 21 the information didn't sound like it was -- it sounded 22 more conspiracy than it was factual. 23 Q. Prior to publishing the first story about 24 Dr. Coomer, were you aware of any federal government -- 25 governmental body that had determined the results of the</p> <p style="text-align: right;">Page 51</p>	<p>1 President Trump; right? 2 A. Absolutely. 3 Q. Did you not find Chris Krebs to be credible? 4 A. I believe we've written about Chris Krebs, and 5 I -- we have doubts about his expertise. 6 Q. Were you aware prior to publishing stories about 7 Dr. Coomer that 59 election scientists had signed a letter 8 finding that there was no credible evidence of computer 9 manipulation of the 2020 presidential election? 10 A. No. 11 Q. Were you aware that U.S. Attorney General 12 William Barr stated on December 1, 2020, there was no 13 evidence that the 2020 presidential election was 14 fraudulent? 15 A. We reported on that. 16 Q. Did you point that out in reporting on 17 Dr. Coomer? 18 A. No. 19 Q. Do you believe Joe Oltmann more than CISA as to 20 how the 2020 presidential election was run? 21 A. I -- I don't compare those two in the same 22 category. CISA's a agency. Joe Oltmann is a private 23 citizen. 24 Q. If you were to learn that your reporting on 25 Dr. Coomer was in any way inaccurate, would</p> <p style="text-align: right;">Page 53</p>

<p>1 The Gateway Pundit retract or correct its reporting?</p> <p>2 A. We make corrections with our reporting all the</p> <p>3 time. We have no problem making a correction if we are</p> <p>4 found that it wasn't correct or accurate.</p> <p>5 Q. And you would do that if you came to learn that</p> <p>6 your reporting on Dr. Coomer was somehow inaccurate?</p> <p>7 A. Yes.</p> <p>8 Q. But you have not retracted or corrected your</p> <p>9 publications concerning Dr. Coomer at this point; right?</p> <p>10 A. Correct.</p> <p>11 Q. Prior to reporting on Dr. Coomer, did</p> <p>12 The Gateway Pundit utilize any election systems experts to</p> <p>13 learn how the election was conducted?</p> <p>14 A. We have used election systems experts in our</p> <p>15 reporting.</p> <p>16 Q. Who have you used?</p> <p>17 A. Several individuals. So would you like me to</p> <p>18 list some names?</p> <p>19 Q. Sure.</p> <p>20 A. Jovan Pulitzer has been an exceptional source.</p> <p>21 We have done reports with Matthew DePerno, an attorney</p> <p>22 from Michigan who's investigating the Dominion systems in</p> <p>23 Michigan.</p> <p>24 We've done reporting with the founder of 8chan,</p> <p>25 who has extensive experience -- analysis, cyber -- cyber</p> <p style="text-align: right;">Page 54</p>	<p>1 Q. You do not contend that Dr. Coomer had any</p> <p>2 involvement in the alleged boxes of ballots found in</p> <p>3 Detroit; right?</p> <p>4 A. We've never connected the two.</p> <p>5 Q. Do you contend that Dr. Coomer had any</p> <p>6 involvement in influencing the outcome of the Georgia</p> <p>7 election?</p> <p>8 A. We know that he was active in the state prior to</p> <p>9 the election.</p> <p>10 Q. Okay. But my question is, do you have any --</p> <p>11 any -- do you have any evidence that Dr. Coomer somehow</p> <p>12 influenced the outcome of the Georgia election?</p> <p>13 A. Yes.</p> <p>14 Q. What evidence do you have?</p> <p>15 A. As -- again, he was working in Georgia prior to</p> <p>16 the election. He was one of the major players from</p> <p>17 Dominion who was part of the sales and training of the</p> <p>18 Dominion system in Georgia, the hundred --</p> <p>19 ten-million-dollar deal.</p> <p>20 He also was called in, I believe, after a</p> <p>21 deadline in Georgia, and was asked to do some work. And I</p> <p>22 believe it was questionable because of the timing, as we</p> <p>23 reported, that this was -- this was taking place prior to</p> <p>24 the election, some updates were taking place. And some</p> <p>25 people had serious questions about this.</p> <p style="text-align: right;">Page 56</p>
<p>1 analysis. We're spoken with actuaries, who wish to remain</p> <p>2 anonymous.</p> <p>3 We've spoken with -- again, my twin brother was</p> <p>4 a top auditor in southeast Asia, running teams of audits</p> <p>5 across southeast Asia, major corporations. So he was a</p> <p>6 exceptional source for our investigations, and continues</p> <p>7 to be.</p> <p>8 We've spoken with several witnesses on the</p> <p>9 ground -- we have their affidavits -- and dozens and</p> <p>10 dozens of people that have signed legal affidavits to --</p> <p>11 of what they saw happening.</p> <p>12 We have researched different venues. We were</p> <p>13 reporting on the Georgia late-night ballot, where they</p> <p>14 were recounting ballots two, three times, stacks of</p> <p>15 ballots.</p> <p>16 We -- we -- we asked for the video from the</p> <p>17 TCF Center in Detroit from election night, November 4th,</p> <p>18 and received that after several weeks. Cost us a lot of</p> <p>19 money. And we were able to reveal a late-night ballot</p> <p>20 drop of 61 boxes of ballots late at night.</p> <p>21 So we've done extensive investigations. We</p> <p>22 continue to. And we've spoken with several experts.</p> <p>23 Q. Have any of the experts opined on how Dr. Coomer</p> <p>24 may have influenced the outcome of the election?</p> <p>25 A. Not that I'm aware of.</p> <p style="text-align: right;">Page 55</p>	<p>1 So when I say that he influenced the election, I</p> <p>2 mean that he had undertaken certain activities before the</p> <p>3 election that certainly could have influenced the</p> <p>4 election.</p> <p>5 Q. Okay. You're aware that Georgia -- the</p> <p>6 secretary of state was Republican; right?</p> <p>7 A. He says that, yes.</p> <p>8 Q. Do you have a reason to disagree with that?</p> <p>9 A. I think he's a very flawed individual.</p> <p>10 Q. Why?</p> <p>11 A. We believe that we've caught him in some</p> <p>12 dishonest activity.</p> <p>13 Q. What dishonest activity?</p> <p>14 A. He released a call. His office released a call</p> <p>15 with President Trump. It was doctored. It was later</p> <p>16 found to be doctored.</p> <p>17 And it was later found that this call -- it was</p> <p>18 either the transcript or the actual recording -- was --</p> <p>19 was deleted and was only found after some cyber experts</p> <p>20 found it. So they tried to cover that this -- this call</p> <p>21 was doctored. And it was, again, deleted, which sounds</p> <p>22 very, very dishonest.</p> <p>23 Q. Okay. Prior to reporting on Dr. Coomer, did you</p> <p>24 have any reason to believe that the Republican secretary</p> <p>25 of state in Georgia was not credible or reliable?</p> <p style="text-align: right;">Page 57</p>

<p>1 A. Yes.</p> <p>2 Q. What evidence did you have?</p> <p>3 A. We reported on the activity in Georgia for</p> <p>4 several weeks and for several days following the election.</p> <p>5 And, of course, the secretary of state was a major player.</p> <p>6 Q. In considering the probability of the</p> <p>7 allegations that Mr. Oltmann made regarding Dr. Coomer,</p> <p>8 were you aware that all states other than Louisiana used</p> <p>9 voting machines that produced paper ballots?</p> <p>10 MR. BURNS: This is John Burns. Object to form.</p> <p>11 Q. (By Mr. Skarnulis) You can go ahead and answer.</p> <p>12 Were you aware of that?</p> <p>13 A. I don't know which states used which systems. I</p> <p>14 assumed they all used some voting computer system.</p> <p>15 Q. Well, what I'm asking about is, were you aware</p> <p>16 that all the states except Louisiana used machines that</p> <p>17 produce paper ballots?</p> <p>18 A. I wasn't aware of that.</p> <p>19 Q. So that if the machines were compromised, there</p> <p>20 are paper ballots to verify. Were you aware of that?</p> <p>21 MR. CORPORON: Objection. Asked and answered.</p> <p>22 Q. (By Mr. Skarnulis) You can go ahead and answer.</p> <p>23 A. I wasn't aware of that.</p> <p>24 Q. Do you disagree with the manual recount of the</p> <p>25 paper ballots that was conducted in Georgia?</p> <p style="text-align: right;">Page 58</p>	<p>1 did you give any consideration to the fact that</p> <p>2 Republicans gained seats in down-ballot elections such as</p> <p>3 the Senate?</p> <p>4 MR. BURNS: This is John Burns. Object to form.</p> <p>5 A. We believe that that's a piece of evidence that</p> <p>6 actually backs our assertion that the presidential</p> <p>7 election was flawed.</p> <p>8 Q. (By Mr. Skarnulis) How?</p> <p>9 A. When you have historic revelations -- outcomes</p> <p>10 that have never happened before, and not just one or two</p> <p>11 but, maybe, ten, yes, it -- it -- you have a pattern. And</p> <p>12 it is -- the pattern shows that this was not a credible,</p> <p>13 secure election as some people insist it was.</p> <p>14 Q. Well, wouldn't it have made sense, if Dr. Coomer</p> <p>15 was to have an influence on the outcome of the election,</p> <p>16 that he would also influence the outcome of the elections</p> <p>17 for the Senate and the House?</p> <p>18 A. Not necessarily.</p> <p>19 Q. Why not?</p> <p>20 A. And we don't know if that happened or not.</p> <p>21 Again, it's speculation.</p> <p>22 But we -- looking at the presidential election,</p> <p>23 the fact that all the bellwethers went to President Trump;</p> <p>24 the fact that he increased his vote tally by 12-,</p> <p>25 13 million votes, the greatest ever; the fact that he had</p> <p style="text-align: right;">Page 60</p>
<p>1 A. Yes.</p> <p>2 Q. Why?</p> <p>3 A. I don't believe it was an accurate audit.</p> <p>4 Again, I have a close source who has done international</p> <p>5 audits with major companies throughout eastern Asia,</p> <p>6 from -- from Korea to Japan to Australia to Singapore.</p> <p>7 And from their expertise, they're saying this was not an</p> <p>8 accurate audit.</p> <p>9 Q. That source is your brother?</p> <p>10 A. Yes. That is one of my sources.</p> <p>11 Q. And you'd agree with me that he is paid by</p> <p>12 The Gateway Pundit; right?</p> <p>13 A. Currently, yes.</p> <p>14 Q. And so he has a financial motive to potentially</p> <p>15 have that opinion; is that fair?</p> <p>16 A. He has a financial motive to be honest.</p> <p>17 Q. Did you brother conduct any review of the</p> <p>18 recount that was performed in Georgia?</p> <p>19 A. Yes.</p> <p>20 Q. What did he do?</p> <p>21 A. We looked at their -- their process and their</p> <p>22 results. And, again, he believed this was not a credible</p> <p>23 audit.</p> <p>24 Q. In considering the probability of the</p> <p>25 allegations that Mr. Oltmann made regarding Dr. Coomer,</p> <p style="text-align: right;">Page 59</p>	<p>1 the most votes of any president ever; the fact that he won</p> <p>2 all of the battleground House seats; the fact that he won</p> <p>3 Florida, Georgia, and Ohio -- something that every winner</p> <p>4 has done for the past hundred years; the fact that the</p> <p>5 turnout was incredibly high, almost unrealistically high,</p> <p>6 in the presidential election this time -- something we</p> <p>7 haven't seen in a hundred years.</p> <p>8 All of this -- and, of course, with the</p> <p>9 candidate he was running against, who did not make many</p> <p>10 campaign stops and certainly didn't have the enthusiasm of</p> <p>11 the president, it all makes you raise an eyebrow; which,</p> <p>12 of course, we're seeing to this day. At least 50 percent</p> <p>13 of the population suspects that the election had some</p> <p>14 flaws.</p> <p>15 Q. Okay. Were you aware -- in considering the --</p> <p>16 the probability of Mr. Oltmann's allegations against</p> <p>17 Dr. Coomer, were you aware of the extensive preelection</p> <p>18 security measures that are in place with all 50 states?</p> <p>19 MR. BURNS: John Burns. Object to form.</p> <p>20 A. I'm not familiar with what each state has as its</p> <p>21 security measures.</p> <p>22 Q. (By Mr. Skarnulis) Were you aware that before</p> <p>23 the election, the U.S. Election Assistance Commission</p> <p>24 certified voting equipment?</p> <p>25 A. I'm not familiar with that commission.</p> <p style="text-align: right;">Page 61</p>

<p>1 Q. Were you aware that all 50 states and thousands 2 of lower jurisdictions had joined the Elections 3 Infrastructure Information Sharing Analysis Center prior 4 to the 2020 presidential election?</p> <p>5 A. Could you repeat that?</p> <p>6 Q. Sure. Have you ever heard of the Elections 7 Infrastructure Information Sharing Analysis Center?</p> <p>8 A. I don't believe so.</p> <p>9 Q. So you were not aware prior to publishing 10 statements about Dr. Coomer that all 50 states had joined 11 that?</p> <p>12 A. Correct.</p> <p>13 Q. And you don't know what the -- what measures the 14 Elections Infrastructure Information Sharing Analysis 15 Center has in place to secure the election?</p> <p>16 A. Again, I'm not familiar with that commission or 17 that agency.</p> <p>18 Q. Did The Gateway Pundit publish any stories 19 suggesting that there might be election fraud prior to 20 November 3, 2020?</p> <p>21 A. We -- yes.</p> <p>22 Q. What -- what stories did The Gateway Pundit 23 publish regarding election fraud prior to the election?</p> <p>24 A. Yes. We questioned the activity of several 25 secretaries of state in -- in numerous battleground states</p> <p style="text-align: right;">Page 62</p>	<p>1 A. This is something that's developed.</p> <p>2 Q. What have you learned that makes you question it 3 at this point?</p> <p>4 A. We currently believe that one of the actors 5 behind this was not a credible source.</p> <p>6 Q. Who?</p> <p>7 A. We -- we believe that -- what is his name? I 8 want to say -- I'll have to think about that. But we've 9 written about him several times. I mean, I could look it 10 up real quick. I'm going blank right now. But I believe 11 his name's Montgomery.</p> <p>12 Q. Okay. I don't think I asked earlier: Did you 13 consult with Ron Watkins at all regarding allegations 14 about Dr. Coomer?</p> <p>15 A. I've spoken with Ron, not about -- I don't think 16 about Coomer, but I've spoken with Ron Watkins.</p> <p>17 Q. What have you spoken with Ron Watkins about?</p> <p>18 A. He gave us some amazing information that backed 19 up our beliefs on -- I believe it was the Dominion 20 systems, something that was posted online. And he looked 21 at it.</p> <p>22 And he, along with, again, my brother, who was a 23 top -- led audit teams and an actuary source we have that 24 believed that the information that Dominion had released 25 was inaccurate. It never would have passed muster in --</p> <p style="text-align: right;">Page 64</p>
<p>1 who had changed the election law unilaterally, when this 2 was a -- this was the power of the legislative branch, and 3 here these -- these officials were changing the rules 4 before the election.</p> <p>5 It was something we had not seen before, and it 6 raised -- certainly, it made us think that this was not -- 7 this was a nefarious act.</p> <p>8 Q. Prior to the November 3, 2020, election, did 9 The Gateway Pundit publish any stories regarding potential 10 computer or technological manipulation of the election?</p> <p>11 A. We've written about voting systems several times 12 in the past.</p> <p>13 Q. Did you do so immediately prior to the 14 November 3, 2020, election?</p> <p>15 A. I don't recall.</p> <p>16 Q. Did The Gateway Pundit publish any story about 17 the Hammer and Scorecard theory?</p> <p>18 A. We may have.</p> <p>19 Q. You're not sure, as you sit here today?</p> <p>20 A. It's -- it's something that we certainly -- I -- 21 I -- I would -- I question that -- the information on that 22 today.</p> <p>23 Q. Did you question the information on that at the 24 time The Gateway Pundit may have reported on the Hammer 25 and Scorecard theory?</p> <p style="text-align: right;">Page 63</p>	<p>1 in the private sector.</p> <p>2 Q. Did you find Ron Watkins to be a credible source 3 for information about Dominion Voting Systems?</p> <p>4 A. For that piece of information, yes.</p> <p>5 Q. Why?</p> <p>6 A. Because it lined up exactly with what our other 7 experts were saying.</p> <p>8 Q. Other than your brother, were there any other 9 experts who were corroborating Mr. Watkins' conclusions?</p> <p>10 A. Actually, we had another actuary who agreed with 11 Mr. Watkins.</p> <p>12 Q. Okay. And who was that?</p> <p>13 A. I can't tell you his name. He wants to go 14 anonymous. We've never -- we've never released his name.</p> <p>15 Q. Okay. But he was an expert as well?</p> <p>16 A. Yes.</p> <p>17 Q. Did -- were you aware of any specific expertise 18 that Mr. Watkins had regarding how voting systems work?</p> <p>19 A. We were aware of his experience and expertise 20 with cyber analysis.</p> <p>21 Q. What did you understand that to be?</p> <p>22 A. He's been very successful. I believe he was the 23 one who is credited with creating the 8chan forum. And I 24 believe his family also has experience with creating cyber 25 platforms. And he seemed very credible. And the</p> <p style="text-align: right;">Page 65</p>

<p>1 information he was putting out, again, agreed with our 2 other sources.</p> <p>3 Q. Okay. You discussed Mr. Watkins' involvement 4 with cyber work. Are you aware of any specific elections 5 or voting-systems expertise that Mr. Watkins has?</p> <p>6 A. Yes. We reported just last week that he had 7 access to what he says is a Dominion whistleblower. And 8 he released information from that whistleblower online.</p> <p>9 And he also -- we expect we'll release more 10 information this week from that whistleblower, as early as 11 tonight.</p> <p>12 Q. Okay. Well, I'll look for that.</p> <p>13 Were you aware that Fredrick Brennan claims to 14 have created 8chan?</p> <p>15 A. No.</p> <p>16 Q. Were you aware that Watkins -- the Watkins 17 family bought 8chan?</p> <p>18 A. No.</p> <p>19 Q. Has The Gateway Pundit published other 20 allegations regarding election fraud other than Dr. Coomer 21 and Dominion Voting Systems after the election?</p> <p>22 A. Yes.</p> <p>23 Q. What other allegations have -- has 24 The Gateway Pundit published stories on?</p> <p>25 A. We published several, again, witness affidavits Page 66</p>	<p>1 And we also were able to detect that they were 2 counting the same ballots, stacks of ballots, three 3 different times.</p> <p>4 We found this also happening outside of the 5 vote-counting room, we believe, at a different time in 6 Georgia, where they were counting stacks of ballots two or 7 three different times.</p> <p>8 And we reported on several other witnesses who 9 have written us over the months about what they saw at 10 their election, you know, polling stations.</p> <p>11 We've written about numerous, like -- we called 12 it the "drop and roll." We still don't believe that it's 13 been successfully explained to us how these ballots in 14 five or six different swing states were all dropped -- a 15 huge amount of ballots for Joe Biden in the middle of the 16 night.</p> <p>17 Of course, the media does not report on this -- 18 the mainstream media, but we have, because we consider 19 ourself a credible organization.</p> <p>20 And this has never been looked at, never been 21 discussed. And we actually have an award out, a reward, 22 if somebody can explain this to us, how this happens and 23 how this is legitimate.</p> <p>24 We also believe that -- after the election, we 25 were looking at the Edison numbers that are used to track Page 68</p>
<p>1 that were recorded on video. We posted several of those 2 online. We posted, I think, at least 20 from Detroit. We 3 covered the hearings in several states.</p> <p>4 We posted video from inside the TCF Center that 5 we were told by the local media this never happened. And 6 we -- we researched. We got the video.</p> <p>7 And, of course, our sources from the beginning 8 who gave us this information on November 4th were 9 absolutely correct.</p> <p>10 And we were able to reveal that there was a 11 vanload of ballots that were dropped at 3:30 in the 12 morning in the TCF Center on election night and actually 13 came back for a second drop after the first drop.</p> <p>14 We know that that -- that van was escorted into 15 the building. We know that the gate had to be lifted. 16 And we also know that they told us that this had never 17 happened. So when we presented the proof, of course, we 18 believe that this was an illicit act that should be 19 investigated that should never have happened.</p> <p>20 We also were the first to report on, in Georgia, 21 they had told the election observers to leave for the 22 night. They all had left, and then we saw the five 23 activist workers enter into the State Farm Center 24 vote-counting room and continue to pull ballots out from 25 under the table, count them. Page 67</p>	<p>1 the totals across the country, and we saw that there was a 2 pattern of several of these states, after their big vote 3 drops, to have the same ratio of votes then play out for 4 the rest of the election cycle, which is, again, something 5 that's never been explained, and we find it abnormal and 6 nearly impossible.</p> <p>7 So there's still several questions out there 8 about what we found and what has not been explained.</p> <p>9 We had one Harvard professor who tried to 10 explain the drop and roll, didn't do a very good job, 11 wasn't very -- it wasn't a thorough description, and so we 12 completely disagreed with that.</p> <p>13 So, anyway, those are some of the main -- the 14 main points that we've reported on. There's been several 15 more. We put up over 2,000 articles about the election 16 fraud. That was back in January. I'm sure it's up to 17 3,000, maybe 4,000, at this point.</p> <p>18 We put up several articles every day. So the 19 Eric Coomer reporting and the Dominion reporting was just 20 a bit part of what we reported over the past several 21 months.</p> <p>22 Q. (By Mr. Skarnulis) Although reporting about 23 Dr. Coomer was just a bit part of your election fraud 24 reporting, prior to publishing your first story about 25 Dr. Coomer, did you give any thought to what effect it may Page 69</p>

<p>1 have on his personal life?</p> <p>2 A. Well, I can tell you I know our source,</p> <p>3 Joe Oltmann, had said that he's under extreme stress since</p> <p>4 he decided to come out with his actual name. He's lost</p> <p>5 his business. He's had threats. He's had white powder</p> <p>6 sent to his house. He's had to move his family at times.</p> <p>7 So I understand that it was very stressful and a</p> <p>8 very courageous decision for him to come out with what he</p> <p>9 believed.</p> <p>10 As far as Eric Coomer, I understand -- I read</p> <p>11 the reports where he said that he had moved at one point.</p> <p>12 So -- and, again, we never support any violence. We -- we</p> <p>13 don't support anyone to attack anyone. But we also</p> <p>14 continue to investigate this story.</p> <p>15 Q. Okay. Did you, prior to publishing your first</p> <p>16 story about Dr. Coomer, give any thought to what the</p> <p>17 effect might be on his personal life?</p> <p>18 A. We've never wished any sort of harm to</p> <p>19 Dr. Coomer.</p> <p>20 Q. Okay. But my question is a little more</p> <p>21 straightforward than that: Did you consider, prior to</p> <p>22 publication, what effect it may have?</p> <p>23 A. We report on different individuals every day,</p> <p>24 and we always consider their safety. We're not a website</p> <p>25 that goes out and doxes people. We're not a website that</p> <p style="text-align: right;">Page 70</p>	<p>1 advertises them as being safe and reliable; right?</p> <p>2 A. Yes.</p> <p>3 Q. And you're aware that Dominion markets its</p> <p>4 systems in both red and blue states; right?</p> <p>5 A. Yes.</p> <p>6 Q. And so do you have any understanding how it</p> <p>7 might benefit Dominion Voting Systems to have had a role</p> <p>8 in shaping the outcome of the election?</p> <p>9 A. I believe that I would speculate if I answered</p> <p>10 why they would be influencing an election.</p> <p>11 Q. How about Eric Coomer? Do you have any working</p> <p>12 theory as to what motive he might have had in influencing</p> <p>13 the 2020 election?</p> <p>14 A. I believe, with Eric Coomer, we have the</p> <p>15 evidence of the -- his Facebook page. We have the</p> <p>16 evidence of his phone calls. We have the evidence of</p> <p>17 his -- again, the videos. And we have the evidence that</p> <p>18 Dominion had deleted his name off of their website for</p> <p>19 some reason and then locked down their -- their website</p> <p>20 for a while.</p> <p>21 And so that's -- we also have evidence now that</p> <p>22 Eric Coomer was, I believe, hosting a party in Denver with</p> <p>23 several election officials that seemed a bit questionable</p> <p>24 activity for someone who's in the voting -- into voting</p> <p>25 systems; that they would be holding parties with democrat</p> <p style="text-align: right;">Page 72</p>
<p>1 goes out and, you know, calls on mobs to cause harm to an</p> <p>2 individual. That's not who we are.</p> <p>3 Q. Were you aware that Mr. Oltmann has called on</p> <p>4 people to observe Eric Coomer where he lives?</p> <p>5 MS. HALL: Object to form. Andrea Hall.</p> <p>6 A. No.</p> <p>7 Q. (By Mr. Skarnulis) Do you have any working</p> <p>8 theory as to what motive or what benefit there may have</p> <p>9 been for Dominion Voting Systems to somehow manipulate the</p> <p>10 outcome of the 2020 election?</p> <p>11 MR. BURNS: John Burns. Object to form.</p> <p>12 A. I -- I -- I would hate to speculate. I think</p> <p>13 that -- I think it's very dangerous go in that direction.</p> <p>14 And -- but I think we need to investigate what</p> <p>15 happened in 2020 election. And we continue to, despite</p> <p>16 the fact that others have not done a very good</p> <p>17 investigation themselves.</p> <p>18 Q. (By Mr. Skarnulis) Okay. But do you have any</p> <p>19 theory as to why it would be in Dominion Voting Systems'</p> <p>20 best interest to manipulate the 2020 election?</p> <p>21 A. Again, I don't want to speculate on that.</p> <p>22 Q. Well, you'd agree with me that Dominion is in</p> <p>23 the business of making voting machines.</p> <p>24 A. Correct.</p> <p>25 Q. And Dominion, as part of its business,</p> <p style="text-align: right;">Page 71</p>	<p>1 officials.</p> <p>2 Q. Okay. We'll look at the texts that were</p> <p>3 produced today in a little while.</p> <p>4 Did The Gateway Pundit derive any benefit in</p> <p>5 publishing its stories regarding election fraud?</p> <p>6 MR. BURNS: John Burns. Object to form.</p> <p>7 A. We try to be as honest as we can. We try to</p> <p>8 follow the facts. That's always what our goal has been.</p> <p>9 We have -- actually, as we're sitting here</p> <p>10 today, there's a great risk in reporting on the election,</p> <p>11 questioning the election. I'm sitting here today</p> <p>12 testifying because we question the election. We -- we put</p> <p>13 out sets of facts, and people didn't like to see those.</p> <p>14 And so here we are today.</p> <p>15 So there's a -- you know, obviously, there is a</p> <p>16 great risk for us, as there was for Mr. Oltmann, to come</p> <p>17 forward and to -- to -- to report on what we believe.</p> <p>18 Q. (By Mr. Skarnulis) Okay. But was there any</p> <p>19 benefit to it?</p> <p>20 A. The benefit would be that we are, I believe, in</p> <p>21 many -- in the eyes of many, we're -- we're seen as more</p> <p>22 credible today. We're seen as more -- seen as more</p> <p>23 reputable. We're seen as, certainly, grassroots leaders.</p> <p>24 And we're also seen as pro-Trump.</p> <p>25 Q. How does The Gateway Pundit make money?</p> <p style="text-align: right;">Page 73</p>

<p>1 A. We make money off of subscriptions. We make 2 money off of advertising. 3 Q. Did you see an increase in subscriptions 4 following publishing stories regarding election fraud? 5 A. We started our subscription services in the 6 spring, so it's hard to say. 7 Q. Well, didn't you have, like, for example, a 8 monthly average leading up to the election? 9 A. Oh. Like traffic-wise? 10 Q. Yes, sir. 11 A. Our traffic has grown every year for the past 12 seven years. Every single year -- we had a huge jump in 13 2016. We also -- election year 2016. We also have grown 14 every year since then. 15 We had a huge jump last year, another election 16 year. But we've continued to grow every year, and it 17 looks like we'll continue to grow this year as well. 18 Q. Okay. Did you -- have you seen an increase in 19 views following the election? 20 A. Well, yes. 21 Q. Okay. We're going to try to look at some 22 documents here. Give me just a minute. I need to -- 23 MR. BURNS: Hey, Steve? We've been going for a 24 while. Can we maybe take five or ten? 25 MR. SKARNULIS: Yeah. Sure. That'll let me get Page 74</p>	<p>1 Q. What is it? 2 A. It's a text message from Joe Oltmann. 3 Q. Okay. Was there a particular reason why 4 Mr. Oltmann was reaching out to you on May 5? 5 A. No. 6 Q. How about on -- on June 10? Was there a reason 7 that Mr. Oltmann was reaching out to you, that you know 8 of? 9 A. No. He was sending some information on the 10 10th. 11 Q. Okay. Have you met Mr. Oltmann in person? 12 A. No. 13 Q. Do you communicate with him regularly? 14 A. I would not say so, no. 15 Q. Now, I've scrolled down on Exhibit 75. And 16 this -- is this -- where it says "Wow," on June 10, that's 17 your response; right? 18 A. Yes. 19 Q. Okay. And then there's a text Sunday from 20 Mr. Oltmann with a picture labeled Jennifer Morrell. Do 21 you see that? 22 A. Yes. 23 Q. And it says "This is at Eric Coomer's house," 24 and has another picture of Ms. Morrell and another woman 25 down below. Do you see that? Page 76</p>
<p>1 my exhibits in order. 2 MR. BURNS: Okay. Thank you. 3 THE VIDEOGRAPHER: Going off the record. The 4 time is 1:05. 5 (Recess from 1:05 p.m. until 1:20 p.m.) 6 THE VIDEOGRAPHER: Back on the record. This 7 marks the beginning of Media Number 2. The time is 1:20. 8 Q. (By Mr. Skarnulis) Okay. Mr. Hoft, at -- at 9 this point, we're going to look at some documents. And 10 I'll share my screen. Let me do that with the first one. 11 Are you having a technical problem there? 12 MR. CORPORON: It says you're muted, Jim. 13 THE WITNESS: There we go. Thank you. 14 Q. (By Mr. Skarnulis) That'll help. 15 A. Yep. 16 Q. All right. So I'm going to show you some 17 exhibits. I'm going to start -- and we've numbered these 18 through the other depositions. So this one that I'm going 19 to show you, we've marked as Exhibit 75. 20 (Plaintiff's Exhibit Number 75 was introduced.) 21 Q. (By Mr. Skarnulis) Okay. Can you see that? 22 A. Yes. 23 Q. Great. Now, Exhibit 75 was produced to us 24 today. Do you recognize it? 25 A. Yes. Page 75</p>	<p>1 A. Yes. 2 Q. And there's an arrow drawn on the second 3 picture, pointing at the house. And you understand that 4 to be Eric Coomer's house? 5 A. I believe that was a point of reference, that 6 it's the same house behind. 7 Q. Who do you understand Jennifer Morrell to be? 8 A. We've written about Jennifer Morrell. She's an 9 activist. She's a far-left activist who's been involved 10 in Arizona, Georgia, and then we see her pop up here at a 11 party at Eric Coomer's. 12 Q. What -- when you say she's "been involved," 13 involved in what? 14 A. We've written about Jennifer Morrell. And 15 she -- she -- I believe she was involved in Arizona as one 16 of the people that the Democrats called in -- the 17 secretary of state -- to -- as a witness. 18 But she's actually -- has a strong background in 19 Democrat politics, liberal politics, and election systems. 20 Q. Do you know what her job is? 21 A. I can't -- I can't tell you that offhand. That 22 was not in the (audio distortion). 23 Q. Do you know where she lives? 24 A. I don't know that. 25 Q. Do you know who the other woman is in this Page 77</p>

<p>1 second picture that we're looking at?</p> <p>2 A. I'm not sure -- certainly not from this picture.</p> <p>3 There were some other photos from that same party that</p> <p>4 included Eric Coomer that were -- several of the</p> <p>5 individuals were -- were identified.</p> <p>6 Q. And I'll -- I'll continue to scroll down so that</p> <p>7 we can see. Let me zoom out for you. And we're looking</p> <p>8 at -- I guess it's page three of Exhibit 75. Sorry. I'm</p> <p>9 having troubles here.</p> <p>10 All right. This Facebook post from</p> <p>11 Lynn Bartels -- do you know who Lynn Bartels is?</p> <p>12 A. I'm not -- I'm not clear at this point.</p> <p>13 Q. Do you know whether she's Republican or</p> <p>14 Democrat?</p> <p>15 A. I know that she was at this party.</p> <p>16 Q. Do you know whether she was Republican or</p> <p>17 Democrat?</p> <p>18 A. No.</p> <p>19 Q. Do you know who Melissa Polk is identified in</p> <p>20 this Facebook post?</p> <p>21 A. The secretary of state's Melissa Polk, is what</p> <p>22 is -- she's identified as.</p> <p>23 Q. Do you know who Colorado's secretary of state</p> <p>24 is?</p> <p>25 A. We've written about that secretary of state in</p> <p style="text-align: right;">Page 78</p>	<p>1 Williams' staff at the secretary of state's office were at</p> <p>2 Eric Coomer's party, depicted in those photos?</p> <p>3 A. I think I lost you on that question.</p> <p>4 Q. I'm sorry. You cut out there, Mr. Hoft.</p> <p>5 Can you --</p> <p>6 A. I didn't hear your question.</p> <p>7 Q. Oh. Okay.</p> <p>8 Would it surprise you to learn that members of</p> <p>9 Wayne Williams' staff were at a party at Eric Coomer's in</p> <p>10 August of 2018?</p> <p>11 A. It would not surprise me.</p> <p>12 Q. Why not?</p> <p>13 A. Well, we've written about one of the individuals</p> <p>14 who was there who says he's a Republican, yes.</p> <p>15 Q. You did a story with some of these photos,</p> <p>16 didn't you?</p> <p>17 A. Yes.</p> <p>18 Q. When was that?</p> <p>19 A. Very recent. Could have been last week.</p> <p>20 Q. What did you consider newsworthy about these</p> <p>21 photos?</p> <p>22 A. A number of things. One is that you have top</p> <p>23 elections officials attending parties. Another is that</p> <p>24 Jennifer Morrell was there, who's been in several</p> <p>25 different states. It's interesting, again.</p> <p style="text-align: right;">Page 80</p>
<p>1 Colorado.</p> <p>2 Q. Do you know what the name of the secretary of</p> <p>3 state is?</p> <p>4 A. Not offhand; although we have written about her</p> <p>5 recently.</p> <p>6 Q. Do you know whether Colorado's secretary of</p> <p>7 state is a Republican or a Democrat?</p> <p>8 A. She's a Democrat.</p> <p>9 Q. Here's another post from Lynn Bartels, and it</p> <p>10 identifies -- it says, "What a team. Steven Bennett" --</p> <p>11 or Bennett -- "and Eric Coomer from</p> <p>12 Dominion Voting Systems. Such great, capable guys."</p> <p>13 Can you see this?</p> <p>14 A. Yes.</p> <p>15 Q. Do you know who Steven Bennett is?</p> <p>16 A. Not offhand.</p> <p>17 Q. Do you know when these photos were taken?</p> <p>18 A. The date said before -- in the fall of 2018.</p> <p>19 Q. Okay. And were you aware that in the fall of</p> <p>20 2018, that -- well, at least until Jena Griswold was</p> <p>21 elected -- Colorado's secretary of state was a Republican?</p> <p>22 A. I was not aware of that.</p> <p>23 Q. Named Wayne Williams?</p> <p>24 A. Okay.</p> <p>25 Q. Would it surprise you if members of Wayne</p> <p style="text-align: right;">Page 79</p>	<p>1 And then you have voting machines executives who</p> <p>2 are -- who are holding the party. And then you have some</p> <p>3 other individuals. Just -- it just looks like an</p> <p>4 interesting crowd.</p> <p>5 What makes it -- what makes it newsworthy is</p> <p>6 that, you know, these are election officials hanging out</p> <p>7 with government officials.</p> <p>8 Q. Did you -- prior to publishing this most recent</p> <p>9 story, did you consider the possibility that it could be</p> <p>10 normal marketing for Dominion Voting to host elections</p> <p>11 officials?</p> <p>12 A. No, I did not consider that.</p> <p>13 Q. Hold on a second. Let me scroll back up.</p> <p>14 Mr. Oltmann writes here on Exhibit 75, "I have</p> <p>15 been doing research on all of them."</p> <p>16 Can you see that?</p> <p>17 A. Right.</p> <p>18 Q. Prior to publishing this recent article with</p> <p>19 these photos, did you ask Mr. Oltmann to see the research</p> <p>20 he'd performed on -- on these individuals?</p> <p>21 A. No.</p> <p>22 Q. Why not?</p> <p>23 A. We weren't doing a deep dive into this. We were</p> <p>24 doing a -- a report of these individuals at a party, which</p> <p>25 is, again, very newsworthy and something that most -- I</p> <p style="text-align: right;">Page 81</p>

<p>1 would say -- I would argue most Americans did not know 2 that we had political officials hanging out with voting 3 machines officials at parties. 4 So it's an interesting story, and so we posted 5 that. And, again, that Jennifer Morrell, the fact that 6 she's there and she's having a party with these people 7 in -- in Colorado after we've spotted her in several 8 states, is -- we thought that was newsworthy. 9 Q. Okay. And Mr. Oltmann writes here, "Also, the 10 judge in the Coomer case, who has been breaking all the 11 procedural rules and acting as a proxy for them, she 12 participated in the June 2020 Antifa BLM March in Denver, 13 Moses." 14 Did I read that correctly? 15 A. Yes. 16 Q. And you wrote, "Wow. You got proof of that? 17 That's big, too"; right? 18 A. I asked the question. 19 Q. Have you published the story on Judge Moses 20 attending a march? 21 A. No. I -- I got an echo for some reason. 22 MR. BURNS: Objection. Relevance. 23 A. I -- I actually researched this and did not find 24 any proof of that. I did not report on that. 25 Q. (By Mr. Skarnulis) Mr. Oltmann writes here on Page 82</p>	<p>1 A. Well, we did report that one Republican was 2 there. 3 Q. Okay. But if there were others who attended, 4 would -- would that have mattered in your reporting? 5 A. Not necessarily. 6 Q. Did you give consideration, prior to publishing 7 the story on it, that it's possible this was a bipartisan 8 meeting of Colorado State elections officials? 9 A. We were just reporting on the party, not the 10 conference that they were attending. 11 Q. Did you consider this gathering to be somehow 12 nefarious? 13 A. Again, I believe I answered that. 14 We felt it was newsworthy because most 15 Americans, I would argue, don't -- don't under -- 16 certainly was news to me that -- were having voting 17 machines executives hanging out with secretary of states 18 and county clerks at parties. 19 Q. Okay. Now, you're aware that other businesses 20 regularly lobby governments in order to obtain business; 21 right? 22 A. Yes. 23 MR. SKARNULIS: There's somebody who needs to 24 mute themselves. 25 Q. (By Mr. Skarnulis) Matt Crane. Do you know who Page 84</p>
<p>1 Exhibit 75, "I have a lawyer friend of mine that came 2 forward and told me she was so far left in her posts on 3 Facebook, she wondered how she got chosen." 4 Did I read that correctly? 5 A. Yes. 6 Q. Do you know who Mr. Oltmann's lawyer friend is 7 he referred to? 8 A. No. 9 Q. Exhibit 75 has a few other pictures, I believe, 10 that are from this party. Is that what you understand 11 them to be? 12 A. Yes. 13 Q. For example, there's this picture here posted by 14 Lynn Bartels, "Love this picture of three county clerks -- 15 Baca's Sharon Dubois, Pitkin's Janice Vos Caudill, and 16 Adams's Stan Martin." 17 Do you see that? 18 A. Yes. 19 Q. Do you know whether these county clerks are 20 Republican or Democrat? 21 A. I did not look into that, and I did not report 22 that these three people were there. 23 Q. Would it have mattered to you in reporting on 24 this that there were a number of Republicans in attendance 25 at this party? Page 83</p>	<p>1 Matt Crane is? 2 A. We've corresponded with Matt Crane. He's 3 written us, and we've written him, and we've written about 4 Matt Crane. 5 Q. Who do you understand -- understand him to be? 6 A. I believe his wife works for Dominion, or did. 7 I believe he was a Republican officeholder. 8 I believe he -- he had -- he had written us, and 9 we disagreed with some of the comments he made. And -- 10 and we wrote about him, and we thought -- we have a big 11 question mark in our reporting with Matt Crane. 12 At this point, he's not someone that we believe 13 is -- we didn't believe the information he sent us was 14 credible. 15 Q. Why not? 16 A. We didn't trust the information he was sending 17 us. 18 Q. Okay. Down here on Exhibit 75, Joe Oltmann 19 writes, "I can deliver the attorney that gave me access." 20 What do you understand him to mean by that 21 sentence? 22 A. I -- again, I would speculate. To me, since 23 we're talking about these photos, I believe it was about 24 this party, the photos that were taken. 25 Q. Okay. Did he deliver the attorney that gave him Page 85</p>

<p>1 access to --</p> <p>2 A. No.</p> <p>3 Q. So you don't have a name of someone who gave him</p> <p>4 access?</p> <p>5 A. No.</p> <p>6 Q. I believe I'm just about to the end of this.</p> <p>7 Okay. Let's move on to a different exhibit. I</p> <p>8 apologize, Mr. Hoft. It is not a particularly quick</p> <p>9 process going through these exhibits.</p> <p>10 MR. SKARNULIS: Rebecca, I am having troubles</p> <p>11 marking our next exhibit. Have I forgotten some secret</p> <p>12 from the private folder to the marked exhibits?</p> <p>13 MS. DOMINGUEZ: Which one are you trying to</p> <p>14 mark, sir?</p> <p>15 MR. SKARNULIS: Four is the next one on the</p> <p>16 private folder. But, essentially, I want to mark four</p> <p>17 through 16 as 76 through whatever.</p> <p>18 MS. DOMINGUEZ: Okay. I'll go ahead and get</p> <p>19 those entered for you.</p> <p>20 MR. SKARNULIS: Great. Thank you.</p> <p>21 MS. DOMINGUEZ: And you said four through 16?</p> <p>22 MR. SKARNULIS: Yeah. And if you just want to</p> <p>23 put four in there now marked as 76, that would be great,</p> <p>24 and then sequentially from there.</p> <p>25 MS. DOMINGUEZ: Yes, sir.</p> <p style="text-align: right;">Page 86</p>	<p>1 important is that it's in UTC Time, which, for Jim, would</p> <p>2 be five hours ahead of Central Time. So just FYI.</p> <p>3 MR. SKARNULIS: Got it. Okay. Thank you for</p> <p>4 that, John.</p> <p>5 MR. BURNS: No problem.</p> <p>6 Q. (By Mr. Skarnulis) So it's actually</p> <p>7 November 16.</p> <p>8 Ms. Martin wrote, "May I introduce you to Randy</p> <p>9 Corporon in Denver? You have a story about one of his</p> <p>10 clients and something about Dominion. He said some of the</p> <p>11 details are not correct, and he wants to get the detail</p> <p>12 [sic] -- to help get the details correct."</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. Did you --</p> <p>16 MR. BURNS: Steve, one last thing. Sorry to</p> <p>17 keep butting in.</p> <p>18 It says November 16th, but the time is -- is</p> <p>19 1:10 a.m. For what it's worth, I believe that this</p> <p>20 message was actually sent and received by Jim on the 15th.</p> <p>21 So, sorry.</p> <p>22 MR. SKARNULIS: Makes sense. Got it.</p> <p>23 Q. (By Mr. Skarnulis) So, actually, this is</p> <p>24 November 15th with the time adjustment.</p> <p>25 Prior to this text message, did you know Randy</p> <p style="text-align: right;">Page 88</p>
<p>1 Exhibit 76 has been introduced.</p> <p>2 MR. SKARNULIS: Great. Thank you. Got it.</p> <p>3 Q. (By Mr. Skarnulis) Okay. Now let me share my</p> <p>4 screen with you, Mr. Hoft.</p> <p>5 (Plaintiff's Exhibit Number 76 was introduced.)</p> <p>6 Q. (By Mr. Skarnulis) Okay. Exhibit 76 is a --</p> <p>7 appears to be a text message. And correct me if I'm</p> <p>8 reading this wrong, but this appears to be from Jenny Beth</p> <p>9 Martin; is that right?</p> <p>10 A. Yes.</p> <p>11 Q. Who is Jenny Beth Martin?</p> <p>12 A. She is the leader of the Tea Party Patriots</p> <p>13 group.</p> <p>14 Q. Where at?</p> <p>15 A. I believe she's based in Georgia.</p> <p>16 Q. Okay. How do you know Ms. Martin?</p> <p>17 A. She's been a national spokesperson for</p> <p>18 conservative causes and -- and activist for several years.</p> <p>19 Q. And if I'm reading this correctly, I -- I take</p> <p>20 it this text was sent November 13; is that right?</p> <p>21 A. Yes.</p> <p>22 MR. BURNS: Actually, Steve, this is John Burns.</p> <p>23 It's actually to the right.</p> <p>24 MR. SKARNULIS: Oh. Here it is. It's 11/16.</p> <p>25 MR. BURNS: And it's -- one thing that's</p> <p style="text-align: right;">Page 87</p>	<p>1 Corporon?</p> <p>2 A. No. I don't believe so.</p> <p>3 Q. Did you talk to Randy Corporon after this text</p> <p>4 from Ms. Martin?</p> <p>5 A. I'm not sure.</p> <p>6 Q. It said, "You have a story about one of his</p> <p>7 clients and something about Dominion. He said some of the</p> <p>8 details are not correct."</p> <p>9 Do you know what details she is referring to</p> <p>10 here?</p> <p>11 A. I think she explained that in another text --</p> <p>12 Q. Okay.</p> <p>13 A. -- as I recall.</p> <p>14 Q. Okay. Probably the easiest thing is I'll go</p> <p>15 through these texts. Look at that. Rebecca has set all</p> <p>16 the exhibits up.</p> <p>17 Okay. Can you see my screen there?</p> <p>18 A. Yes.</p> <p>19 Q. And is this your response to Ms. Martin?</p> <p>20 A. Actually, this is Randy's response to</p> <p>21 Ms. Martin and to myself.</p> <p>22 Q. Gotcha. Thank you for that clarification.</p> <p>23 Okay.</p> <p>24 (Plaintiff's Exhibit Number 78 was introduced.)</p> <p>25 Q. (By Mr. Skarnulis) Okay. Exhibit 78. This is</p> <p style="text-align: right;">Page 89</p>

<p>1 dated November 24th at 4:00 in the morning, so it's</p> <p>2 actually, probably, November 23rd with the Universal Time.</p> <p>3 What is this exhibit?</p> <p>4 A. I had reached out to Joe Oltmann and asked him</p> <p>5 about the whereabouts of Eric Coomer.</p> <p>6 Q. Why were you asking Mr. Oltmann about the</p> <p>7 where -- whereabouts of Eric Coomer?</p> <p>8 A. For numerous reasons.</p> <p>9 Q. What are some of those reasons?</p> <p>10 A. I wanted to see if I could reach out to him, for</p> <p>11 one, if he had the contact of Mr. Coomer. I wanted to see</p> <p>12 if Mr. Coomer was safe. I wanted to see if anybody knew</p> <p>13 where he was, since I don't believe we had heard anything</p> <p>14 at that time. Certainly, I don't think I had heard</p> <p>15 anything at that time about Coomer since our articles went</p> <p>16 up.</p> <p>17 Q. Did you ever do a Google search for Mr. Coomer's</p> <p>18 address or phone number?</p> <p>19 A. No.</p> <p>20 Q. And let's keep moving here so I can live by my</p> <p>21 promise to keep this timely.</p> <p>22 Okay. This has been marked as Exhibit, I</p> <p>23 believe, 79. Yeah, 79.</p> <p>24 (Plaintiff's Exhibit Number 79 was introduced.)</p> <p>25 Q. (By Mr. Skarnulis) Do you recognize this?</p> <p style="text-align: right;">Page 90</p>	<p>1 Randy Corporon to you.</p> <p>2 In the second the sentence there, it says, "My</p> <p>3 client friend Joe Oltmann just told me you guys are</p> <p>4 talking in 15, so that will handle what I wanted to talk</p> <p>5 about."</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. So was this the interview on November 15 that</p> <p>9 you and I discussed earlier?</p> <p>10 A. Yes.</p> <p>11 (Plaintiff's Exhibit Number 83 was introduced.)</p> <p>12 Q. (By Mr. Skarnulis) Okay. And this appears to</p> <p>13 be -- this is Exhibit 83. This appears to be your</p> <p>14 response to Mr. Corporon; right?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And then when was the first article about</p> <p>17 Dr. Coomer published?</p> <p>18 A. That would have been on the 13th, at</p> <p>19 The Gateway Pundit.</p> <p>20 Q. Okay. And then subsequent to interviewing</p> <p>21 Mr. Oltmann, you published another article; right?</p> <p>22 A. Yes.</p> <p>23 Q. Okay.</p> <p>24 (Plaintiff's Exhibit Number 84 was introduced.)</p> <p>25 Q. (By Mr. Skarnulis) Okay. Exhibit -- sorry --</p> <p style="text-align: right;">Page 92</p>
<p>1 A. Yes.</p> <p>2 Q. What is it?</p> <p>3 A. This is a text message from Randy.</p> <p>4 Q. Okay. And this is dated December 23rd, 2020, at</p> <p>5 4:00 p.m.</p> <p>6 At this point. Were you aware about the lawsuit</p> <p>7 that was filed on behalf of Dr. Coomer?</p> <p>8 A. I don't remember when that lawsuit was filed.</p> <p>9 Q. I believe it was December 22nd. It might have</p> <p>10 been December 23rd, but just probing your memory.</p> <p>11 Did you ever appear on Mr. Corporon's radio</p> <p>12 show?</p> <p>13 A. I believe so, yes.</p> <p>14 Q. And did you discuss Dr. Coomer?</p> <p>15 A. I'm not sure what the topics were.</p> <p>16 Q. When did you appear on Mr. Corporon's radio</p> <p>17 show?</p> <p>18 A. I believe it was around this time, that that</p> <p>19 text message was sent.</p> <p>20 Q. Exhibit 80 -- I'm sorry -- appears to be a</p> <p>21 duplicate.</p> <p>22 (Plaintiff's Exhibit Number 82 was introduced.)</p> <p>23 Q. (By Mr. Skarnulis) Okay. All right. This</p> <p>24 exhibit, Exhibit 82, is dated November 16 at 2:00 in the</p> <p>25 morning, so it's actually November 15. And this is from</p> <p style="text-align: right;">Page 91</p>	<p>1 84. Do you recognize this?</p> <p>2 A. It appears to be a text message from Randy</p> <p>3 Corporon.</p> <p>4 Q. Okay. Mr. Corporon writes, "Yes. And he</p> <p>5 understands the technology, code, back-door access, even</p> <p>6 though we don't have any proof of that. "</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Did you ever ask Mr. Oltmann about his</p> <p>10 understanding of the technology of the Dominion Voting</p> <p>11 Systems machines?</p> <p>12 A. I believe he volunteered that information during</p> <p>13 our discussion.</p> <p>14 Q. What did he tell you about his knowledge about</p> <p>15 the technology?</p> <p>16 A. He had told me that he runs a -- some sort of a</p> <p>17 technology firm, and that he was knowledgeable of this --</p> <p>18 this type of information.</p> <p>19 Q. Did Mr. Oltmann ever tell you that he was</p> <p>20 knowledgeable about the software code in</p> <p>21 Dominion Voting Systems' machines?</p> <p>22 A. I don't recall that.</p> <p>23 Q. How about back-door access? Did Mr. Oltmann</p> <p>24 ever talk to you about his knowledge regarding back-door</p> <p>25 access?</p> <p style="text-align: right;">Page 93</p>

<p>1 A. I don't recall that.</p> <p>2 Q. What do you understand back-door access to mean?</p> <p>3 A. It means secret access to a system online.</p> <p>4 Q. In any of your stories regarding Dr. Coomer, did</p> <p>5 you ever -- did The Gateway Pundit ever note that there</p> <p>6 was no proof of Dr. Coomer influencing the election?</p> <p>7 A. I don't believe we wrote that.</p> <p>8 Q. Mr. Corporon goes on to say, "Sounds like Rudy</p> <p>9 and Sidney Powell do, though."</p> <p>10 Did you talk to Rudy Giuliani regarding the</p> <p>11 story about Dr. Coomer?</p> <p>12 A. No.</p> <p>13 Q. How about Sidney Powell? Did you talk to</p> <p>14 Sidney Powell about Dr. Coomer?</p> <p>15 A. No.</p> <p>16 Q. He writes here, "But she has said specifically</p> <p>17 that votes were switched."</p> <p>18 Are you aware of any specific evidence from</p> <p>19 Sidney Powell that votes were switched?</p> <p>20 A. No.</p> <p>21 (Plaintiff's Exhibit Number 85 was introduced.)</p> <p>22 Q. (By Mr. Skarnulis) Okay. Exhibit 85. This is</p> <p>23 dated November 24th. Do you recognize this?</p> <p>24 A. I believe that must be from Joe --</p> <p>25 Q. Okay.</p> <p style="text-align: right;">Page 94</p>	<p>1 Yeah, 86.</p> <p>2 Do you recognize this?</p> <p>3 A. Yes.</p> <p>4 Q. What is this?</p> <p>5 A. So this is our first report where we mentioned</p> <p>6 Eric Coomer.</p> <p>7 Q. Okay. And you're the author of this; right?</p> <p>8 A. Yes.</p> <p>9 Q. On the second page of this exhibit, you write,</p> <p>10 "In 2016, Coomer told the Illinois State Board of --</p> <p>11 State's Board of Elections that it was possible to bypass</p> <p>12 election system software."</p> <p>13 Did I read that correctly?</p> <p>14 A. Yes.</p> <p>15 Q. What did you base that assertion on?</p> <p>16 A. Video and report that was written in 2016.</p> <p>17 Q. What report was that?</p> <p>18 A. It was this report here at The Post & Email.</p> <p>19 Q. What is The Post?</p> <p>20 A. I think it's -- The Post & Email is the name of</p> <p>21 the media outlet.</p> <p>22 Q. What is The Post & Email?</p> <p>23 A. It's a -- it's a -- I believe, a website.</p> <p>24 Q. Is it a blog similar to The Gateway Pundit?</p> <p>25 A. Yes.</p> <p style="text-align: right;">Page 96</p>
<p>1 A. -- Oltmann.</p> <p>2 Q. "I sent someone to his house and no sign of</p> <p>3 him," is what it appears Mr. Oltmann writes to you; is</p> <p>4 that correct?</p> <p>5 A. Yes.</p> <p>6 Q. Do you know why Mr. Oltmann would have sent</p> <p>7 someone to Dr. Coomer's house?</p> <p>8 A. Just for his own investigation.</p> <p>9 Q. Didn't that concern you that Mr. Oltmann was</p> <p>10 having someone observe Eric Coomer?</p> <p>11 MS. HALL: Objection. Andrea Hall. Form.</p> <p>12 Q. (By Mr. Skarnulis) Go ahead and answer.</p> <p>13 A. I don't -- I don't think someone driving by the</p> <p>14 house to see if there's some lights on is something that's</p> <p>15 a major concern.</p> <p>16 Q. You wouldn't think that that could be considered</p> <p>17 menacing to the resident of that house?</p> <p>18 MS. HALL: Objection to form. Andrea Hall.</p> <p>19 MR. CORPORON: Objection. Calls for legal</p> <p>20 conclusion. Corporon.</p> <p>21 Q. (By Mr. Skarnulis) You can go ahead and answer.</p> <p>22 A. I -- I don't want to speculate.</p> <p>23 (Plaintiff's Exhibit Number 86 was introduced.)</p> <p>24 Q. (By Mr. Skarnulis) Okay. Exhibit -- trying to</p> <p>25 remember what exhibit we're on. I believe it's 86.</p> <p style="text-align: right;">Page 95</p>	<p>1 Q. Does The Post & Email have either a liberal or</p> <p>2 conservative angle?</p> <p>3 A. I assume conservative. I don't know.</p> <p>4 Q. Did you contact anyone at The Post & Email</p> <p>5 before publishing this article?</p> <p>6 A. No.</p> <p>7 Q. On this -- two pages down, it says, "Dominion</p> <p>8 was written about by the Clinton Global Initiative."</p> <p>9 Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. What did you do to learn that Dominion was</p> <p>12 written about by the Clinton Global Initiative?</p> <p>13 A. I -- I believe if you scroll down, there's a</p> <p>14 screen grab. Maybe not. We actually had found that</p> <p>15 online.</p> <p>16 Q. Now, on this next page that we're looking at</p> <p>17 here, you begin to discuss Mr. Oltmann's story; right?</p> <p>18 A. Yes.</p> <p>19 Q. And this is where you post Mr. -- or</p> <p>20 Dr. Coomer's Facebook entries; right?</p> <p>21 A. Yes.</p> <p>22 Q. At the time of publication, were you aware that</p> <p>23 these were from a private Facebook account?</p> <p>24 A. I don't know. I -- I knew it was from Facebook.</p> <p>25 I didn't know if it was private or not.</p> <p style="text-align: right;">Page 97</p>

<p>1 Q. Where it says here -- and I'll, kind of, point 2 for you -- "Dr. Coomer retweeted the Antifa manifesto 3 letter to President Trump." 4 You'd seen that Antifa manifesto letter before; 5 right? 6 A. I don't know. 7 Q. Well, you've read it since; right? 8 A. Sure. 9 Q. Do you believe that to be actually a letter 10 created by somebody associated with Antifa? 11 A. I would say associated or someone who -- from 12 Antifa who supports this letter. 13 Q. And -- this copy is not very -- 14 A. Yeah. 15 Q. Did you not -- 16 A. The screen grabs -- the -- the actual post 17 includes screen grabs of the actual letter, but they did 18 not show up in this copy here. 19 Q. Gotcha. 20 Well, again, going back to the Antifa manifesto, 21 did you not understand at least some of that to be 22 intended as sarcasm or irony? 23 A. No. 24 MR. SKARNULIS: Okay. Let's go off the record 25 for five minutes. Let me check and see what more, if any, Page 98</p>	<p>1 So, Mr. Hoft, I just went on 2 The Gateway Pundit's website to pull up this article 3 written by you and published December 28, 2020. Do you 4 recognize it? 5 A. Yes. 6 Q. What prompted you to write this article about 7 "Old Billionaire Offers Million-Dollar Bounty for 8 Dominion's Eric Coomer's Comeuppance"? 9 A. This individual, Alki David, offered a million 10 dollars for information on Eric Coomer and 11 Dominion Voting Systems. 12 Q. Did you know Alki David before writing this 13 article? 14 A. No. 15 Q. Did you talk to Mr. David in preparing to write 16 this article? 17 A. No. 18 Q. Why not? 19 A. We felt we had the information. 20 Q. What -- what does this headline mean by 21 "comeuppance"? 22 A. This was an opinion piece just saying that this 23 is a -- if you scroll down -- there was a -- this 24 Alki David had offered a reward if someone can produce 25 information that would prove that, as I wrote, an easy way Page 100</p>
<p>1 I've got to go over with you. 2 THE VIDEOGRAPHER: Going off the record. The 3 time is 2:01. 4 (Recess from 2:01 p.m. until 2:09 p.m.) 5 THE VIDEOGRAPHER: Back on the record. The time 6 is 2:09. 7 THE WITNESS: This is not working. Let me see. 8 MR. SKARNULIS: Can you -- can you hear me, 9 Mr. Hoft? 10 THE WITNESS: Sorry. Technical difficulties. 11 THE VIDEOGRAPHER: Can we go off the record? 12 MR. SKARNULIS: Yeah. 13 THE VIDEOGRAPHER: Going off the record. The 14 time is 2:10. 15 (Recess from 2:10 p.m. until 2:11 p.m.) 16 THE VIDEOGRAPHER: Back on the record. The time 17 is 2:11. 18 Q. (By Mr. Skarnulis) All right, Mr. Hoft. I'm 19 going to show you my screen. I'll represent -- can you 20 see that? 21 A. Yes. 22 Q. I -- I just -- 23 A. Yes. 24 Q. Somebody, I don't think, is muted. So hopefully 25 that doesn't happen again. Page 99</p>	<p>1 to become a millionaire. Yeah. Just to find out more 2 information on the Dominion systems, I believe. 3 Q. Okay. But, again, let me go back to the word 4 "comeuppance." What did you mean by "comeuppance"? 5 A. Well, in our opinion at this point, this was -- 6 this was a -- this was a billionaire offering money for 7 someone -- again, comeuppance would be someone to catch 8 Dominion or its executives in actual voter fraud. 9 Q. You'd agree with me, at the time of the 10 publication of this article, you had no evidence that 11 Dr. Coomer actually influenced the outcome of the 2020 12 presidential election; right? 13 A. Well, we spoke about this earlier. 14 He was very active in several states, and we 15 also had that information from his Facebook page and from 16 the call he made with the Antifa activist that he was 17 plotting against the Republican candidate. 18 Q. Okay. But let me ask the question again. 19 At the time of the publication, you had no 20 evidence that Dr. Coomer had actually, in any way, 21 manipulated the vote? 22 A. No. Just what I said. 23 Q. Okay. And, in fact, as we sit here today, you 24 still don't have any evidence that Dr. Coomer changed even 25 one vote in the 2020 presidential election, do you? Page 101</p>

<p>1 A. Just what we reported.</p> <p>2 Q. In publishing this article about a bounty, you</p> <p>3 don't, in -- anywhere in this article, designate this</p> <p>4 piece as purely opinion, do you?</p> <p>5 A. Well, no. But certainly from the -- the</p> <p>6 headline, it's clear that it's opinion.</p> <p>7 Q. How is that clear?</p> <p>8 A. Eric Coomer's comeuppance, that's not -- that's</p> <p>9 not something we typically say. And opinion means that</p> <p>10 this is our belief that he would be caught in something.</p> <p>11 And so we -- you know, when you say someone's comeuppance,</p> <p>12 it's because they're guilty of something.</p> <p>13 Q. And you considered Eric Coomer to be guilty of</p> <p>14 something on December 28, 2020?</p> <p>15 A. In our opinion.</p> <p>16 Q. You were aware of Dr. Coomer's lawsuit at the</p> <p>17 time of this publication, weren't you?</p> <p>18 A. Yes.</p> <p>19 Q. Have you talked to Alki David since the</p> <p>20 publication of this article?</p> <p>21 A. No, I don't believe so.</p> <p>22 Q. Are you aware of any evidence that this bounty</p> <p>23 offered by Alki David procured?</p> <p>24 A. I have not heard of anyone collecting the</p> <p>25 reward.</p> <p style="text-align: right;">Page 102</p>	<p>1 Q. You don't have any evidence that Dr. Coomer,</p> <p>2 either singularly or in bulk, used the adjudication</p> <p>3 function to switch votes; right?</p> <p>4 A. If you -- that's actually a link, the blue text.</p> <p>5 And if you click on that, you'll see the video of him</p> <p>6 explaining that -- the adjudication function from the</p> <p>7 machines, which, again, he describes can be used to alter</p> <p>8 votes. And so that's where we get that statement.</p> <p>9 Q. What do you understand the adjudication process</p> <p>10 in elections to be?</p> <p>11 A. When ballots -- in my understanding, when</p> <p>12 ballots are kicked out of the machines, and then you need</p> <p>13 human resources to determine what they believe the voter</p> <p>14 intended on the ballot.</p> <p>15 Q. And do you understand that that function is</p> <p>16 performed by local elections officials?</p> <p>17 A. Yes.</p> <p>18 Q. And you're aware that there's supposed to be a</p> <p>19 Republican adjudication official and a Democrat</p> <p>20 adjudication official to meet and try to adjudicate</p> <p>21 ballots; right?</p> <p>22 A. I believe that's what's intended. I don't</p> <p>23 believe that that's what always takes place.</p> <p>24 Q. You know that adjudication's been around for</p> <p>25 decades; right?</p> <p style="text-align: right;">Page 104</p>
<p>1 Q. Do you have any evidence that Eric Coomer has</p> <p>2 any ties to China?</p> <p>3 A. No.</p> <p>4 Q. Are you familiar with Sidney Powell's</p> <p>5 allegations regarding Dominion and Venezuela?</p> <p>6 A. Certainly, we've heard those allegations.</p> <p>7 Q. What do you understand those allegations to be?</p> <p>8 MR. BURNS: John Burns. Objection. Calls for</p> <p>9 speculation.</p> <p>10 A. Yeah. Truly.</p> <p>11 She's accusing Dominion of being involved with</p> <p>12 Dominion -- with Venezuelan elections.</p> <p>13 Q. (By Mr. Skarnulis) Do you have any evidence of</p> <p>14 any ties between Dr. Coomer and Venezuela?</p> <p>15 A. No.</p> <p>16 Q. Here in this article -- which, for counsel, we</p> <p>17 will add a copy of this. We'll screen-capture this and</p> <p>18 add a copy to the marked exhibits.</p> <p>19 You write in blue here, "He also can be seen in</p> <p>20 training videos explaining to users adjudication functions</p> <p>21 on the vote machine that could allegedly be used to alter</p> <p>22 votes singularly or in bulk if a nefarious user chose to</p> <p>23 do so."</p> <p>24 Did I read that correctly?</p> <p>25 A. Yes, sir.</p> <p style="text-align: right;">Page 103</p>	<p>1 A. Sure.</p> <p>2 Q. And the voting machines, you'd agree with me,</p> <p>3 have to have some manner in which the local elections</p> <p>4 officials, if properly done, can meet, confer, and</p> <p>5 adjudicate what was intended on a particular ballot;</p> <p>6 right?</p> <p>7 MR. BURNS: John Burns. Objection as to form.</p> <p>8 Calls for speculation.</p> <p>9 A. I do know that witnesses in Detroit testified</p> <p>10 that they were adjudicating ballots without -- without</p> <p>11 both Republican and Democrat observers present.</p> <p>12 Q. (By Mr. Skarnulis) You don't contend that</p> <p>13 Dr. Coomer had any involvement in that, do you?</p> <p>14 A. I would contend that there were reports that</p> <p>15 these machines were kicking out a high number of ballots</p> <p>16 for adjudication process.</p> <p>17 Q. Do you have any reason to believe that</p> <p>18 Dr. Coomer had any influence on Detroit machines kicking</p> <p>19 out any ballots?</p> <p>20 A. I believe that the Dominion officials were at</p> <p>21 the TCF Center in Detroit.</p> <p>22 Q. Was Dr. Coomer at the TCF Center?</p> <p>23 A. I don't have any information that he was there.</p> <p>24 Q. Do you have any information that Dr. Coomer,</p> <p>25 even if he was not there, was involved in the adjudication</p> <p style="text-align: right;">Page 105</p>

<p>1 at the TCF Center?</p> <p>2 A. I don't have information that he was involved in</p> <p>3 that, except for the fact that he was the person who had</p> <p>4 patents on the adjudication processes, procedures, or</p> <p>5 software with the Dominion systems.</p> <p>6 Q. Do you know exactly what patents Dr. Coomer had</p> <p>7 attributed to him?</p> <p>8 A. We've written about that, and I would have to</p> <p>9 see that information.</p> <p>10 Q. You write here, "It is also alleged that he or</p> <p>11 Dominion performed illegal, uncertified updates to</p> <p>12 possibly thousands of Georgia election machines just days</p> <p>13 before the election"; right?</p> <p>14 A. Yes.</p> <p>15 Q. And you'd agree with me that your -- well, who</p> <p>16 alleged that?</p> <p>17 A. This was a report we had posted through</p> <p>18 information that they had updated these machines, as I had</p> <p>19 previously stated, in Georgia within the time frame where</p> <p>20 it should have been -- it should have been -- it should</p> <p>21 have taken place before this -- this -- I forget, 30-,</p> <p>22 45-day time period before the election.</p> <p>23 And, actually, they broke that rule and put the</p> <p>24 updates in despite the -- the legal parameters. They</p> <p>25 broke that and -- and made the adjustments within that</p> <p style="text-align: right;">Page 106</p>	<p>1 violates the Court order. We intend to file a motion to</p> <p>2 stop this practice.</p> <p>3 If you want to do it, I want a running objection</p> <p>4 that I disagree with this whole follow-up questioning.</p> <p>5 MR. CORPORON: Well, I certainly understand your</p> <p>6 objection and would be interested in you pointing me to</p> <p>7 any provision in the Court's order that prohibits us from</p> <p>8 doing the normal course of activity during a deposition,</p> <p>9 and that is asking follow-up or clarifying questions.</p> <p>10 MR. SKARNULIS: Well, the Court's order allowed</p> <p>11 Plaintiff to conduct limited discovery.</p> <p>12 Furthermore, by way of a reply brief, the</p> <p>13 defendants cannot add additional evidence. So it's</p> <p>14 nonsensical to think that follow-up deposition questions</p> <p>15 can be evidence, where you have access to the witness and</p> <p>16 could certainly provide affidavit testimony.</p> <p>17 MR. ARRINGTON: This is Barry Arrington. If I</p> <p>18 could jump in for just a moment, because I cannot allow</p> <p>19 Steve's prior to statement to go unchallenged.</p> <p>20 Can you point me to any provision of law that</p> <p>21 prevents a party filing a reply brief to point to</p> <p>22 additional evidence that rebuts the evidence that was put</p> <p>23 in the response to which they're replying? It seems like</p> <p>24 a reply would be pointless if you couldn't do that.</p> <p>25 Now, I agree you can't come up with entirely</p> <p style="text-align: right;">Page 108</p>
<p>1 time period.</p> <p>2 Q. Do you believe that Dr. Coomer performed</p> <p>3 illegal, uncertified updates to, possibly, thousands of</p> <p>4 Georgia election machines?</p> <p>5 A. I -- I put "he or Dominion." And I know that he</p> <p>6 was involved with the secretary of state of Georgia in</p> <p>7 making this decision, in coming to this decision to make</p> <p>8 these updates that many perceived as illegal because they</p> <p>9 were within that certain time period.</p> <p>10 Q. "He or Dominion." So it could have been him,</p> <p>11 could have been somebody else at Dominion?</p> <p>12 A. Correct. But he was actually mentioned in the</p> <p>13 news articles being part of this decision process.</p> <p>14 Q. All right. Mr. Hoft, have you understood my</p> <p>15 questions today?</p> <p>16 A. Yes.</p> <p>17 Q. Have I treated you fairly and respectfully</p> <p>18 today?</p> <p>19 A. Yes.</p> <p>20 MR. SKARNULIS: All right. I pass the witness.</p> <p>21 MR. CORPORON: All right. I've got a few</p> <p>22 questions for him, Steve.</p> <p>23 MR. SKARNULIS: Randy, I'm going to object to</p> <p>24 that. I will let you know that this notion of Defendants</p> <p>25 asking softball leading questions to their witnesses</p> <p style="text-align: right;">Page 107</p>	<p>1 different theories of law and -- and just go in a</p> <p>2 completely different way that was never contemplated in</p> <p>3 the opening brief. But the whole point of a reply brief</p> <p>4 is to rebut -- is to rebut the response.</p> <p>5 And so I'm just putting on the record now that</p> <p>6 you should expect that our reply brief will have whatever</p> <p>7 evidence that we deem necessary to respond to your</p> <p>8 response.</p> <p>9 MR. SKARNULIS: Well, I can give you case cites</p> <p>10 about the reapply brief in the anti-SLAPP context, because</p> <p>11 I have researched it, and it is not allowed.</p> <p>12 So we can have that fight via the papers. I</p> <p>13 just wanted to make my record about why I'm objecting to</p> <p>14 additional questioning.</p> <p>15 MR. ARRINGTON: Well, maybe I'm wrong about this</p> <p>16 and have been, you know, always wrong about what the</p> <p>17 purpose of reply brief is.</p> <p>18 But if you could send the group some of your</p> <p>19 cites saying it's wrong to reply in a reply, I sure would</p> <p>20 appreciate it.</p> <p>21 MR. SKARNULIS: Gladly.</p> <p>22 MR. CORPORON: Yeah. And, Steve, when did you</p> <p>23 do this research? If it's conclusive, as you make it</p> <p>24 sound, any reason not to have shared it sooner with us?</p> <p>25 MR. SKARNULIS: I'm not sure when. I'm looking</p> <p style="text-align: right;">Page 109</p>

<p>1 it up to see if I can figure out when we looked at that. 2 But we are planning on filing a motion to that effect. 3 And I believe I've shared this, perhaps, with -- I'm not 4 sure. I'm not readily finding it in my email. 5 But you can go ahead and ask your questions, 6 Randy. I -- I have put my record together, and I'll 7 object to form or otherwise as necessary. And in the 8 meantime, I'll continue to search my emails. 9 MR. CORPORON: We'll note your ongoing 10 objection, then. Thank you, Steve. 11 MR. SKARNULIS: Sure. 12 MR. CORPORON: Can you throw that -- that online 13 article that you just had as an exhibit back up there? 14 MR. SKARNULIS: Yeah. 15 MR. CORPORON: Go ahead. 16 CROSS-EXAMINATION 17 BY MR. CORPORON: 18 Q. All right. Thank you. 19 This is awkward, since I'm not operating it, but 20 I guess we'll start here. Mr. Hoft, do you note the date 21 of this article is December 28th; correct? 22 A. Correct. 23 Q. December 28, 2020. 24 By the time this article was -- but published at 25 Gateway Pundit, were you aware that -- that Mr. Coomer had</p> <p style="text-align: right;">Page 110</p>	<p>1 Q. All right. You're not concluding that these 2 are -- you're not concluding that these are facts that are 3 proven or established, are you? 4 A. Correct. 5 Q. Okay. 6 MR. CORPORON: All right. You can take that 7 off, Steve, and I'm going to see if I can access the 8 exhibits. 9 And someone on tech can help me. I'm getting 10 security privacy concerns about sharing the screen with 11 Zoom. 12 Rebecca, are you there? 13 MS. DOMINGUEZ: Yes. You should be able to 14 share. Anyone can share. It's all set up correctly. 15 MR. CORPORON: All right. Try again. I do 16 apologize. This is my very first time. And I messed 17 around with Zoom beforehand. 18 I wonder, is there a distinction -- I'm on Apple 19 computers. Is it Rebecca? 20 MS. DOMINGUEZ: Yes, sir. You should just have 21 to hit that "Share Screen" button in the very center. 22 MR. CORPORON: I did, and it says "open system 23 preferences," which I've done, and it goes to security and 24 privacy. 25 MS. DOMINGUEZ: Then that's an internal issue</p> <p style="text-align: right;">Page 112</p>
<p>1 published a commentary in Denver Post on December 3rd 2 where he denied that the social media posts that we've 3 been talking about quite a bit on Facebook, Antifa, 4 et cetera, were not his? 5 MR. SKARNULIS: Objection. Leading. 6 MR. CORPORON: It's cross-examination. 7 A. I'm aware of that article. 8 Q. (By Mr. Corporon) Okay. Were you -- 9 MR. SKARNULIS: He's not a fact witness, 10 Mr. Corporon. I'll make my objections. 11 MR. CORPORON: Thank you. 12 Q. (By Mr. Corporon) Will you scroll down near the 13 end of that, please? And then, hopefully, I have the 14 skills to take over the exhibits. 15 Just scroll up from there just a little bit, if 16 you would, Steve. Little more. Right there. 17 Mr. Hoft, I notice in the concluding paragraphs 18 of this story that you used the term "allegedly" 19 repeatedly. And why do you use the term "allegedly" when 20 you're talking about some of the conclusions in this 21 piece? 22 A. "Allegedly" meaning it's -- it's been alleged. 23 It's been -- he's been accused of this. So when you say 24 "alleged," it's -- it's -- you're still investigating if 25 the accusation is accurate.</p> <p style="text-align: right;">Page 111</p>	<p>1 with you MacBook. You need to go to your video settings 2 in your MacBook and give Zoom access to your screens. 3 MR. SKARNULIS: Do we want to go off the record? 4 MR. CORPORON: Yeah. Let's -- give me 5 five minutes here. It's telling me I've got to quit and 6 reopen. I've figured my way through the security issues. 7 Five minutes? 8 MR. SKARNULIS: Sure. 9 THE VIDEOGRAPHER: Going off the record. The 10 time is 2:34. 11 (Recess from 2:34 p.m. until 2:39 p.m.) 12 THE VIDEOGRAPHER: Back on the record. The time 13 is 2:39. 14 (Defendant's Exhibit D was introduced.) 15 Q. (By Mr. Corporon) All right. Mr. Hoft, can you 16 see what's been marked as Defendant's Exhibit D, your 17 About page from the Gateway Pundit? 18 A. Yes. 19 Q. All right. And who wrote this? 20 A. That would have been myself and maybe an 21 assistant. 22 Q. And on the About page, you give your history of 23 starting out as a blogger; correct? 24 A. Correct. 25 Q. And say -- you say that you wrote brief</p> <p style="text-align: right;">Page 113</p>

<p>1 introductions, links to other content, serving as a hub 2 for current events in the political and media sphere. 3 So at that time, were you offering opinion along 4 with your links to other content? 5 A. Yes. 6 Q. And has that really changed in your evolution 7 from blogspot.com to TheGatewayPundit.com? 8 A. It's basically the same. 9 Q. All right. Why did you believe that a site like 10 yours was necessary? What's going on in the news world 11 that causes you to spend the kind of time that you do 12 here? 13 A. There was obviously an opening, and we filled 14 that gap in media coverage, and we continue to to this 15 day. 16 Q. You say here at the bottom of the page -- you 17 can probably see my pointer -- that you believe it is 18 important to be transparent about your beliefs and 19 perspectives, how it may shape your news and opinion 20 priorities. 21 Why is that important? 22 A. People know what their -- our perspective is 23 when they come to the page. We're well known to be 24 conservatives, and they certainly can -- can see that in 25 our writing.</p> <p style="text-align: right;">Page 114</p>	<p>1 A. They told us to take down some articles. 2 Q. All right. And did you consider their requests? 3 A. We certainly reviewed the articles in question. 4 We -- we decided to leave up a couple of these articles, 5 and a couple of the articles we took down. 6 Q. All right. Do you remember what was the 7 determining factor in articles that you took down versus 8 those that you left up? 9 A. I'm honestly not sure at this point. 10 Q. Okay. Well, let's take a look at -- at the 11 articles that were referenced. 12 (Defendant's Exhibit A was introduced.) 13 Q. (By Mr. Corporon) I've got Defendant's 14 Exhibit A on the screen now. Is that large enough for do 15 you see it okay? 16 A. Yes, sir. 17 Q. All right. This is a compendium of the articles 18 that are listed in the complaint filed by Mr. Coomer 19 against you and others. Let me scroll back up to the top 20 here. These are in chronological order. 21 So I think you testified earlier that this is 22 the first story that you published regarding the 2020 23 election on election fraud? 24 A. This certainly looks like one of them back in 25 October.</p> <p style="text-align: right;">Page 116</p>
<p>1 Q. On the top of the next page, "Our website covers 2 breaking news and provides opinion in the most pressing 3 issues of the day." 4 Do you often combine your news and opinion into 5 the same articles? 6 A. Sure. 7 Q. Is there a particular way that you try and 8 distinguish the two? 9 A. I think it's evident most the time. 10 Q. All right. Go ahead. 11 A. No. That's -- that's it. 12 Q. All right. 13 You said you do provide opportunities for people 14 who find statements that you've made or links that you've 15 posted to be untrue to let you know about that so that you 16 can do further investigation? 17 A. Yes. 18 Q. Have you received any responses from 19 Dominion Voting Systems or Eric Coomer on your correction 20 links challenging any specific question -- any specific 21 statements or articles that you've posted? 22 A. We -- we were contacted by some Dominion 23 attorneys at one point within the past several months. 24 Q. All right. Did they point to any specific facts 25 or articles that they were claiming were untrue?</p> <p style="text-align: right;">Page 115</p>	<p>1 Q. I'm sorry. Strike that question. 2 This is an early October story that you 3 published as part of ongoing series of questions and 4 articles that you've published regarding election fraud; 5 correct? 6 A. Yes. 7 Q. All right. Scroll down to two here. Will you 8 read what you printed in bold? 9 A. "Its time for every American to keep their eyes 10 open for Democrat voter fraud. If you see anything 11 suspicious, capture it on your iPhone. Make sure to 12 capture faces or licenses if available. Everyone can help 13 to stop voter fraud." 14 Q. All right. That first sentence, is that opinion 15 or news? 16 A. That would be opinion. 17 Q. And yet, earlier in the story. You do report on 18 some news facts; correct? You link to articles from other 19 sources that talk about ballot applications and the other 20 topics that this story addresses; correct? 21 A. Correct. 22 Q. All right. Let's scroll down here through a few 23 pages. We could stop on each of those, but I just don't 24 want to take the time. 25 A. That was actually a good article there.</p> <p style="text-align: right;">Page 117</p>

<p>1 Q. This article on the election?</p> <p>2 A. This was -- yes. It was the 2020 prediction.</p> <p>3 We used the same -- same sort of patterns we</p> <p>4 were watching in 2016 as we were in 2020. And we -- we</p> <p>5 made our prediction, and we made the same prediction in</p> <p>6 2016, and using the same data.</p> <p>7 And so it was a very thorough investigation and</p> <p>8 really an excellent piece and looking at what was</p> <p>9 happening before the actual vote count in November.</p> <p>10 Q. And I do understand. The reason I blew by it is</p> <p>11 because this really is opinion; isn't it? This is you as</p> <p>12 Gateway Pundit --</p> <p>13 A. Absolutely. It was a prediction.</p> <p>14 Q. Yeah. Okay.</p> <p>15 So this next article is entitled -- that I want</p> <p>16 to look at -- October 31, 2020, Roger Stone exclusive,</p> <p>17 "How the Democrats plan to steal the 2020 election."</p> <p>18 A. Correct.</p> <p>19 Q. Do you consider news or opinion?</p> <p>20 A. This, obviously, is an opinion piece.</p> <p>21 Q. And why do you say "obviously"?</p> <p>22 A. Because there's no facts yet. I mean, it was</p> <p>23 before the election. So for him to say that this is how</p> <p>24 they're going to do it is just his speculation.</p> <p>25 Q. Okay. And this is Roger Stone talking about</p> <p style="text-align: right;">Page 118</p>	<p>1 time, I heard from Jenny Beth and from you, Randy</p> <p>2 Corporon.</p> <p>3 Q. I think we established that you interviewed Joe</p> <p>4 in the late evening of November 15th, and --</p> <p>5 A. Correct.</p> <p>6 Q. -- then you published the interview with him on</p> <p>7 the 16th; correct?</p> <p>8 A. Correct.</p> <p>9 Q. So this article was published in</p> <p>10 November 13th about Eric Coomer. Was this prior to you</p> <p>11 having contact with Joe Oltmann?</p> <p>12 A. Yes.</p> <p>13 Q. Direct contact. Okay.</p> <p>14 So what was it that led you to be looking into</p> <p>15 Eric Coomer prior to having any contact -- direct contact</p> <p>16 with Joe Oltmann?</p> <p>17 A. Well, this information for this story was going</p> <p>18 viral online. And we had already reported on Dominion.</p> <p>19 So this was another, let me say, piece of the puzzle. It</p> <p>20 was more information on Dominion that was newsworthy.</p> <p>21 And, again we -- we then found video to -- we</p> <p>22 included in this -- this report here on Mr. Coomer.</p> <p>23 Q. Okay. Did you find it concerning that -- that</p> <p>24 ten days after the election -- by ten days after the</p> <p>25 election, that Dominion had actually removed Eric Coomer's</p> <p style="text-align: right;">Page 120</p>
<p>1 these issues, not The Gateway Pundit; correct?</p> <p>2 A. This was a guest post by Roger Stone.</p> <p>3 Q. Okay. Now, you're the title holder here. It</p> <p>4 says, "By Joe Hoft." So when you say it was a guest post</p> <p>5 by Roger Stone, what do you mean?</p> <p>6 A. Roger Stone submitted it. My brother Joe</p> <p>7 actually published it.</p> <p>8 Q. Okay. Does the article make clear that this is</p> <p>9 written by Roger Stone?</p> <p>10 A. Yes.</p> <p>11 Q. And is there any opinion added to this article</p> <p>12 by your brother, Joe Hoft?</p> <p>13 A. I do not believe so, no.</p> <p>14 Q. Okay. Just scrolling through again, in the</p> <p>15 chronology over events, this is the first article that you</p> <p>16 published about Eric Coomer on November 13, 2020; correct?</p> <p>17 A. Correct.</p> <p>18 Q. This was prior to your interview of Joe Oltmann?</p> <p>19 A. Correct.</p> <p>20 Q. Yet you were reporting on -- had you had any</p> <p>21 contact with Joe Oltmann prior to those text messages</p> <p>22 between Jenny Beth Martin or yourself or Joe that you went</p> <p>23 through with Mr. Skarnulis?</p> <p>24 A. I had contact with Joe Oltmann sometime in that</p> <p>25 weekend, and I had interviewed Joe. And then around that</p> <p style="text-align: right;">Page 119</p>	<p>1 profile from their website?</p> <p>2 MR. SKARNULIS: Objection. Leading.</p> <p>3 A. Absolutely.</p> <p>4 Q. (By Mr. Corporon) Why?</p> <p>5 A. His -- Eric Coomer's name was suddenly making</p> <p>6 the rounds online, on Twitter. The stories going viral.</p> <p>7 And so then, all of a sudden, his name disappears from the</p> <p>8 Dominion page.</p> <p>9 Q. Again, this is prior to you having any contact</p> <p>10 with Joe Oltmann; correct?</p> <p>11 A. Correct.</p> <p>12 Q. This next section of this story, this is the</p> <p>13 September 2016, video in Illinois where Dr. Coomer is</p> <p>14 describing how votes can be changed within the software?</p> <p>15 A. Correct.</p> <p>16 Q. And I'm not particularly computer savvy, but did</p> <p>17 I describe that properly?</p> <p>18 A. Yes.</p> <p>19 Q. The question, apparently, that Dr. Coomer was</p> <p>20 asked is if it's possible to bypass election system</p> <p>21 software, go directly to the data tables that manage the</p> <p>22 systems running elections. And his response was, "Yes, if</p> <p>23 they have access."</p> <p>24 What did you take that to mean?</p> <p>25 A. I took to it mean that, yes, they can alter</p> <p style="text-align: right;">Page 121</p>

<p>1 information on their systems from outside of -- from</p> <p>2 outside of the immediate location.</p> <p>3 Q. All right. Below this picture of the video of</p> <p>4 Dr. Coomer, you say, "Here's more from the Post & Email."</p> <p>5 And then you have in bold some statements here:</p> <p>6 "Dr. Coomer's statement brings to light a very</p> <p>7 serious issue." Is that your statement or a statement of</p> <p>8 The Post & Email?</p> <p>9 A. That's from The Post & Email.</p> <p>10 Q. Okay. So anything that's in an indented</p> <p>11 paragraph --</p> <p>12 A. Yes.</p> <p>13 Q. -- with the bold line is -- is you quoting from</p> <p>14 an article or a source?</p> <p>15 A. Yes.</p> <p>16 Q. All right.</p> <p>17 And now this last paragraph in bold, "It is very</p> <p>18 interesting that Twitter would remove the one account that</p> <p>19 was investigating Coomer, his far-left background, and his</p> <p>20 role at Dominion."</p> <p>21 Is that news or opinion?</p> <p>22 A. That's opinion.</p> <p>23 Q. Written my whom?</p> <p>24 A. That would have been written by me.</p> <p>25 Q. So this is another example of one of your many</p> <p style="text-align: right;">Page 122</p>	<p>1 Q. And in the title, you say, "Denver business</p> <p>2 owner, Dominion's Eric Coomer, is an unhinged sociopath.</p> <p>3 His internet profile is being deleted and erased."</p> <p>4 Is that you making those statements?</p> <p>5 A. No. That's a Denver business owner.</p> <p>6 Q. So that's -- that title is intended to</p> <p>7 demonstrate that you're referring to what somebody else</p> <p>8 says?</p> <p>9 A. Correct.</p> <p>10 Q. Okay.</p> <p>11 Throughout this piece, did you utilize any other</p> <p>12 sources other than your interview with Joe Oltmann or</p> <p>13 actual -- what you believed to be actual Facebook and</p> <p>14 other social media of Eric Coomer?</p> <p>15 A. I believe I may have mentioned that Mr. Oltmann</p> <p>16 had been interviewed by Michelle Malkin. I did that on</p> <p>17 this post or a previous post. And so I included that</p> <p>18 information also.</p> <p>19 Q. All right. Did you ever watch any of the</p> <p>20 interviews between Joe Oltmann and Michelle Malkin?</p> <p>21 A. Yes.</p> <p>22 Q. All right. In any of those interviews, do you</p> <p>23 recall Joe Oltmann -- did you watch him during this period</p> <p>24 of this publication? Or what's the time frame that you</p> <p>25 watched those interviews?</p> <p style="text-align: right;">Page 124</p>
<p>1 articles on the election combining news and opinion?</p> <p>2 A. Correct.</p> <p>3 Q. All right. Now, this report, "Anti-Trump</p> <p>4 Dominion Voting Systems security chief was participating</p> <p>5 in Antifa calls, posted Antifa Manifesto letter to Trump</p> <p>6 online."</p> <p>7 What sources of information did you have to</p> <p>8 share this report?</p> <p>9 A. This was from -- more information from his</p> <p>10 Facebook page.</p> <p>11 Q. All right. And this was, again, prior to those</p> <p>12 text messages with Jenny Beth Martin and me or the</p> <p>13 interview that you did with Joe Oltmann; correct?</p> <p>14 A. Correct.</p> <p>15 Q. Subsequent to posting this report November 14th</p> <p>16 of last year, have you learned of any information that</p> <p>17 would cause you to change any of the allegations or</p> <p>18 conclusions that you drew in this piece?</p> <p>19 A. No.</p> <p>20 Q. We'll come back to some of the Facebook posts in</p> <p>21 just a little bit, but I want to get through this exhibit.</p> <p>22 Now, this article published November 16, 2020,</p> <p>23 this was following your interview of Joe Oltmann and</p> <p>24 publication of that interview; correct?</p> <p>25 A. Correct.</p> <p style="text-align: right;">Page 123</p>	<p>1 A. I believe Michelle interviewed Joe Oltmann on</p> <p>2 the 14th, and I interviewed Joe Oltmann on the 15th.</p> <p>3 Q. Do you remember when you watched Michelle's</p> <p>4 interview? Was that prior to yours?</p> <p>5 A. Absolutely.</p> <p>6 Q. Do you recall if Joe Oltmann stated, then,</p> <p>7 whether he had a recording of the phone call or not?</p> <p>8 A. I don't recall that.</p> <p>9 Q. Okay. Now, when you did your interview of</p> <p>10 Joe Oltmann, did you edit that in any way before you</p> <p>11 posted it?</p> <p>12 A. No.</p> <p>13 Q. All right. During the interview, did</p> <p>14 Joe Oltmann describe for you the -- the -- the history of</p> <p>15 his involvement in looking into Antifa infiltration of</p> <p>16 Denver media?</p> <p>17 A. Yes.</p> <p>18 Q. Did he describe for you any timeline -- maybe</p> <p>19 not specific dates, but just the period of time that he</p> <p>20 was involved in making these inquiries?</p> <p>21 A. Yes.</p> <p>22 Q. And was there anything about his story that you</p> <p>23 found to be disingenuous or conflicting narrative?</p> <p>24 A. No.</p> <p>25 Q. During his interview with you, did he claim to</p> <p style="text-align: right;">Page 125</p>


<p>1 have any kind of a smoking gun?</p> <p>2 A. No, just his sitting in on the call with the</p> <p>3 Antifa protesters.</p> <p>4 Q. In fact, during the interview with you,</p> <p>5 Joe Oltmann said he didn't have a smoking gun, didn't he?</p> <p>6 A. Correct.</p> <p>7 Q. In fact, what he said is that all of the</p> <p>8 different facts that he laid out during the course of the</p> <p>9 interview is what led to his conclusion that there was a</p> <p>10 smoking gun?</p> <p>11 A. Yes.</p> <p>12 Q. Do you remember him -- do you remember him</p> <p>13 saying at the end that you can draw a conclusion one way</p> <p>14 or another, but if you put all the pieces together, that's</p> <p>15 your smoking gun, at the end of your interview?</p> <p>16 A. Makes -- sounds -- sounds good, yes.</p> <p>17 Q. All right. I'm not going to pull up a</p> <p>18 transcript of the interview --</p> <p>19 A. Okay.</p> <p>20 Q. -- in the interest of time. But if he said</p> <p>21 that, did that make sense to you?</p> <p>22 A. Yes.</p> <p>23 Q. And did that contribute to your decision to</p> <p>24 publish the entire interview, along with the social media</p> <p>25 you had discovered that you believed to belong to</p> <p style="text-align: right;">Page 126</p>	<p>1 Q. All right. And it's interspersed in between a</p> <p>2 number of different facts that you're reporting; correct?</p> <p>3 A. Why yes.</p> <p>4 Q. For instance, just above, you actually link to</p> <p>5 the actual Antifa manifesto, or what you call the Antifa</p> <p>6 letter to Trump?</p> <p>7 A. Yes.</p> <p>8 Q. And where did you discover that Antifa letter to</p> <p>9 Trump?</p> <p>10 A. That was on Joe Oltmann's Twitter page before it</p> <p>11 was taken down.</p> <p>12 Q. Okay.</p> <p>13 What did you find most -- or what did you find</p> <p>14 disturbing about Coomer's Facebook posts, given his</p> <p>15 position as a security expert and officer at</p> <p>16 Dominion Voting Systems?</p> <p>17 A. They appeared completely biased and unhinged.</p> <p>18 Q. Did they appear to be pro-American,</p> <p>19 anti-American?</p> <p>20 A. Anti-American.</p> <p>21 Q. Did they appear to be opposed against any</p> <p>22 particular political candidate?</p> <p>23 A. They were against President Trump.</p> <p>24 Q. Okay. In this section that is highlighted right</p> <p>25 now -- take a quick look at that, and then tell us, who do</p> <p style="text-align: right;">Page 128</p>
<p>1 Eric Coomer?</p> <p>2 A. Yes.</p> <p>3 Q. Is there anything -- any fact, any letter from a</p> <p>4 lawyer, just anything at all that has caused you to doubt</p> <p>5 whether the Facebook postings and other social media</p> <p>6 contained in this article are not the postings of</p> <p>7 Eric Coomer?</p> <p>8 A. No.</p> <p>9 Q. Since his denial in the Denver Post on</p> <p>10 December 3rd, have you heard or seen anything from</p> <p>11 Eric Coomer that would lead you to believe that he has</p> <p>12 changed or recanted his denial that this is his social</p> <p>13 media?</p> <p>14 A. I believe that has happened. I don't have that</p> <p>15 information with me.</p> <p>16 Q. Have you read anything in the court proceedings</p> <p>17 and filings of Eric Coomer that lead you to believe that</p> <p>18 he now admits that this is his social media?</p> <p>19 A. I have not read that.</p> <p>20 Q. Okay.</p> <p>21 Looking at this sentence in the middle of the</p> <p>22 page that I'm pointing to, "Joe's tweets on Eric Coomer</p> <p>23 obviously upset big tech."</p> <p>24 Is this fact reporting or opinion reporting?</p> <p>25 A. That would be opinion.</p> <p style="text-align: right;">Page 127</p>	<p>1 you believe Eric Coomer is addressing these statements to?</p> <p>2 A. Trump voters.</p> <p>3 Q. Well, look a little more carefully and read the</p> <p>4 actual language here, if you can.</p> <p>5 A. He's writing to -- oh -- Christian jihadists, VP</p> <p>6 pic. Unfriend me now if you're going to vote for this</p> <p>7 narcissist. I'm not joking.</p> <p>8 Q. Now, that you've looked at it --</p> <p>9 A. He says, "I'm looking at you," three names of</p> <p>10 friends. "I disagree with you on many philosophical</p> <p>11 grounds but respect your opinions. Only an absolute F-ing</p> <p>12 idiot would ever vote for that windbag F-tard."</p> <p>13 Q. Yeah. And what is his final instruction there</p> <p>14 in bold?</p> <p>15 A. "Unfriend me now."</p> <p>16 Q. Yeah. So now that you've read that, who do you</p> <p>17 think they he's addressing this to?</p> <p>18 A. Must be some friends or acquaintances.</p> <p>19 Q. Did it concern you that Mr. Coomer would write</p> <p>20 to his own friends this way, understanding that he was the</p> <p>21 security expert and officer at Dominion Voting machines?</p> <p>22 MR. SKARNULIS: Objection. Form. Objection.</p> <p>23 Leading.</p> <p>24 A. Yes. It's shocking.</p> <p>25 Q. (By Mr. Corporon) Did statements like this --</p> <p style="text-align: right;">Page 129</p>

<p>1 and we're not going to go through them all. Well, let me 2 just ask you this: Did you read the deposition transcript 3 of the deposition of OAN expert -- I'm sorry -- OAN 4 officer, Charles Herring? 5 A. Yes. 6 Q. Did you review the cross-examination of 7 Mr. Herring by his attorney, Bernard Rhodes? 8 A. I read it over. 9 Q. And do you recall -- 10 MR. ZAKHEM: Randy -- can I -- can I just jump 11 in? This is Zakhem. Can I ask how much longer you've got 12 so I can deal with my afternoon? 13 MR. CORPORON: I would say maybe 20 minutes, 14 maybe less. 15 MR. ZAKHEM: Thank you. 16 MR. CORPORON: This is my longest exhibit. 17 Q. (By Mr. Corporon) All right. So you read the 18 cross-examination by Mr. Rhodes of Mr. Herring, where they 19 outlined all of the different -- so many of the different 20 statements from Facebook and other social media of 21 Eric Coomer; correct? 22 A. Yes. 23 Q. Were you familiar with and aware of all of those 24 statements at the time that you posted this particular 25 article?</p> <p style="text-align: right;">Page 130</p>	<p>1 Mr. Coomer's motivation to do such things if he is, in 2 fact, able to do so? 3 A. Yes. 4 MR. SKARNULIS: Object. 5 A. Yes. 6 THE REPORTER: I'm sorry. I didn't quite 7 understand the objection. 8 MR. SKARNULIS: Leading. 9 MR. CORPORON: Cross-examination. 10 Q. (By Mr. Corporon) All right. This is a 11 68-page exhibit. We're at about 45 now. So we're just 12 about done with the big one. 13 This statement here, "A lot of people may be 14 glad to know that Texas rejected using Dominion Voting." 15 Is that news or opinion? 16 A. That would be opinion. 17 Q. So this is another example of the type of 18 reporting that you do where you intersperse links to news 19 with your opinion throughout? 20 A. Yes. 21 Q. Okay. You were asked some questions about this 22 particular article at the end of the direct examination. 23 This is the article about the billionaire offering a 24 million dollars; correct? 25 A. Correct.</p> <p style="text-align: right;">Page 132</p>
<p>1 A. Yes. 2 Q. In fact, most of them are included in this 3 article; correct? 4 A. Yeah. 5 Q. How did this factor into your consideration 6 about continuing to post articles about Eric Coomer? 7 A. I think it's very relevant. 8 Q. Why? 9 A. Because it really shows you what he's really 10 thinking when he's posting something like this on a 11 private Facebook page. 12 It appears that he'd be much more open on a 13 private Facebook page than he would in a public page, and 14 it would really reveal what he was thinking about the 15 current political climate and the current president and 16 his supporters. 17 Q. You've been asked multiple times today whether 18 you have specific evidence that Eric Coomer shifted a vote 19 here or flipped a vote there. Do you remember that line 20 of questioning that's come up throughout your deposition? 21 A. Sure. Yes. 22 Q. In response to those questions, your answer has 23 been, no, you don't have any specific evidence; correct? 24 A. Correct. 25 Q. Do you believe you have significant evidence of</p> <p style="text-align: right;">Page 131</p>	<p>1 Q. And you published this December 28th? 2 A. Yes. 3 Q. And perhaps I already asked you this. I think, 4 maybe, I did, so apologies if I did. You were aware at 5 the time you published this that Eric Coomer had written 6 in the Denver Post that the social media Antifa 7 allegations, et cetera, were not his? 8 A. I believe so. 9 Q. Okay. And did you believe his denials at the 10 time? 11 A. No. 12 Q. Did his denials add to your thinking about 13 whether the allegations against Mr. Coomer were credible 14 or not? 15 A. I don't understand the question. 16 Q. Well, you saw that Eric Coomer denied in the 17 Denver Post that these were his -- that the Facebook 18 postings and social media postings -- he claimed they were 19 fabricated; correct? 20 A. I don't -- I don't know the exact wording. 21 Something like that. 22 Q. Okay. He denied that they were his. Does 23 that -- do you remember that? 24 A. Sure. 25 Q. Okay. Did the fact that he was making those</p> <p style="text-align: right;">Page 133</p>

<p>1 denials when you had actually seen these Facebook postings</p> <p>2 and other social media posts with his name on them add to</p> <p>3 your belief that you were publishing truth about</p> <p>4 Eric Coomer?</p> <p>5 A. Yes.</p> <p>6 Q. In your reporting, did you ever publish, as a</p> <p>7 fact, that Eric Coomer actually changed the election?</p> <p>8 A. No.</p> <p>9 Q. Did you publish in your stories evidence about</p> <p>10 the ways Eric Coomer could have changed the election?</p> <p>11 A. That's a broad question. I'm not sure.</p> <p>12 Q. I'll withdraw the question.</p> <p>13 A. Yeah.</p> <p>14 Q. When you're explaining how -- well, strike that.</p> <p>15 Let's just keep moving, since we're getting -- all getting</p> <p>16 tired here.</p> <p>17 Looking at the blue links in this: As an</p> <p>18 employee of Dominion, he seemed to be fairly integral. In</p> <p>19 fact, he seems to have designed several voting-machine</p> <p>20 patents which belong to Dominion but now belong to China's</p> <p>21 HSBC as of last year.</p> <p>22 Is this an example of opinion, fact, or a</p> <p>23 combination of both?</p> <p>24 A. I'd say a combination.</p> <p>25 Q. All right. What's the opinion portion?</p> <p style="text-align: right;">Page 134</p>	<p>1 A. Sure.</p> <p>2 Q. And I believe your answer to those was you don't</p> <p>3 personally have any working theories. Was that -- is</p> <p>4 accurate?</p> <p>5 A. Sounds good, yes.</p> <p>6 Q. Okay. Have you reported on others' working</p> <p>7 theories?</p> <p>8 A. Yes.</p> <p>9 Q. Is this article dated January 9, 2021, by</p> <p>10 Deroy -- where you report on the Deroy Murdock's</p> <p>11 inventory -- is that an example of one of those?</p> <p>12 A. Right. That was some analysis he put together</p> <p>13 that he had published around that time.</p> <p>14 Q. All right. And, in fact, you also have put</p> <p>15 together a -- a presentation about some of the theories</p> <p>16 that you have reported on in the Gateway Pundit, haven't</p> <p>17 you?</p> <p>18 A. Yes.</p> <p>19 Q. And, in fact, let's move to Exhibit E.</p> <p>20 (Defendant's Exhibit E was introduced.)</p> <p>21 Q. (By Mr. Corporon) This exhibit is entitled.</p> <p>22 "The Gateway Pundit election fraud and irregularities in</p> <p>23 the 2020 U.S. election."</p> <p>24 Who put this together?</p> <p>25 A. That was myself and my twin brother.</p> <p style="text-align: right;">Page 136</p>
<p>1 A. Just linking him to China.</p> <p>2 Q. All right.</p> <p>3 A. And that -- yeah.</p> <p>4 Q. Go ahead.</p> <p>5 A. No. I just think just the fact that this -- I</p> <p>6 say he's fairly integral, and he certainly had a high</p> <p>7 position. And so I think that's what I was trying to</p> <p>8 spell out there.</p> <p>9 Q. Okay. You refer -- in this subsection that's</p> <p>10 highlighted with arrows, you refer to Smartmatic. How are</p> <p>11 Smartmatic and Dominion related, in your understanding?</p> <p>12 A. I believe Smartmatic and Dominion, obviously,</p> <p>13 are two different companies. I think one might have been</p> <p>14 a spinoff of the other.</p> <p>15 I think Smartmatic was the first company --</p> <p>16 voting company. That was the based in Venezuela. And</p> <p>17 then, I believe, Dominion, of course, is based in -- out</p> <p>18 of -- their headquarters Canada, with a big presence in</p> <p>19 Denver, Colorado.</p> <p>20 Q. All right. Let's skip through a few of these</p> <p>21 and see if we can bring this exhibit to a close.</p> <p>22 You were asked several times during your</p> <p>23 deposition, Mr. Hoft, about working theories that you have</p> <p>24 about how Dominion or Eric Coomer stole this election. Do</p> <p>25 you remember some of those questions?</p> <p style="text-align: right;">Page 135</p>	<p>1 Q. Okay. And you mentioned your brother's</p> <p>2 qualifications as some kind of a security analyst. Can</p> <p>3 you elaborate on that a little bit?</p> <p>4 A. Yes. He was a top auditor, vice president of</p> <p>5 one of the top 200 Fortune 500 -- or Fortune 200</p> <p>6 companies, and he ran the audit teams across Southeast</p> <p>7 Asian from -- as I mentioned, from Korea, Japan, down to</p> <p>8 Taiwan and New Zealand and Australia.</p> <p>9 So he did that for ten years. He was based out</p> <p>10 Hong Kong and ran, like I said, audit teams. So he's very</p> <p>11 well-versed on -- you know what to expect from an audit,</p> <p>12 how to run an audit, preparation for audits, what -- what</p> <p>13 you look for in audits, and how people react to audits.</p> <p>14 So he was a great source during this time.</p> <p>15 Q. All right. This is a 39-page exhibit, including</p> <p>16 the title page. So was each one of these a slide that you</p> <p>17 used for a presentation? Or was what was the purpose of</p> <p>18 this?</p> <p>19 A. Yes. This was for a pen presentation we</p> <p>20 delivered at Liberty University in April, along with</p> <p>21 several other individuals.</p> <p>22 I believe we were the keynote speakers for that</p> <p>23 conference. And so we presented this online at the</p> <p>24 Liberty University master's program, I believe --</p> <p>25 business -- business program.</p> <p style="text-align: right;">Page 137</p>

<p>1 Q. Okay. So when you were asked about not have- -- 2 about having a theory of how the election was stolen, did 3 you understand what Mr. Skarnulis was asking you? 4 A. Well, certainly, this -- this full report, then, 5 would be our evidence of what we were -- what we believed 6 happened. 7 Q. Okay. So, in effect, you do have some working 8 theories about the election, don't you? 9 A. Sure. 10 Q. And I'm not going to go through this entire 11 PowerPoint, but just this introduction lays out a number 12 of different facets to your ongoing investigation into the 13 2020 election; correct? 14 A. Correct. 15 Q. And what is your conclusion at the end of this 16 presentation? 17 A. We concluded that there was several things that 18 happened and occurred during the 2020 election that would 19 bring us to the conclusion that the election was likely 20 stolen. 21 Q. All right. And during any of this presentation, 22 did you refer to any of your reporting on Eric Coomer? 23 A. I don't believe so. 24 Q. Do you consider your reporting on Eric Coomer to 25 be conclusive with regard to the 2020 presidential</p> <p style="text-align: right;">Page 138</p>	<p>1 Q. Are you aware that police evacuated his house 2 when a white substance was delivered to him earlier this 3 year? 4 A. Yes. 5 Q. Are you aware that he has, apparently, relocated 6 out of the state of Colorado? 7 A. Not clear on that, no. 8 Q. Are you at all sensitive to the concerns of 9 being associated with or coming under the scrutiny of 10 Antifa? 11 A. Yes. 12 Q. Why? 13 A. Because I've been under threat from Antifa 14 activists also. 15 Q. In what way? 16 A. In, I believe it was 2018, Antifa organizers out 17 in Washington, D.C. posted -- well, published their own 18 hit list of conservative individuals, including 19 Tucker Carlson, Ann Coulter, Gateway Pundit, myself, 20 Breitbart, and a couple others. 21 And they actually had assaulted Tucker Carlson's 22 home, had vandalized his home, had threatened his wife, 23 who was home at the time. 24 The police in St. Louis actually visited my home 25 when they were informed that I was one of the people who</p> <p style="text-align: right;">Page 140</p>
<p>1 election or simply one piece of a very large pie? 2 A. It was definitely just one piece of the 3 reporting we have done since November. 4 Q. Okay. Did you ever -- you were asked some 5 questions, I believe, about Dominion's denials of their 6 involvement in changing the results of this election. Do 7 you recall those questions? 8 A. Sure. 9 Q. Do you remember if you ever reported on or 10 linked to Dominion's website and their denials? 11 A. I believe we've linked to the Dominion website. 12 And, yes, I believe we reported on their denials when they 13 posted that. 14 Q. Okay. 15 You were asked a number of questions about the 16 impact of doing this reporting on -- on Eric Coomer. You 17 were asked to speculate about what that impact might be. 18 Are you aware of any significant impact on 19 Joe Oltmann for coming forward with -- with his 20 presentation? 21 A. I think it -- I think it's been devastating for 22 him. He's lost his position at his corporation. His 23 family has been under threat. He's been -- has hired 24 security. He continues to be under threat, as I believe. 25 And so it's been devastating for him to step forward.</p> <p style="text-align: right;">Page 139</p>	<p>1 was also on this same list. 2 Q. So we were -- you were asked to speculate on how 3 that might -- your reporting might make Eric Coomer feel. 4 How did finding out you were on an Antifa hit list make 5 you feel? 6 A. It's frightening. 7 Q. When you saw that a well-known reporter, Tucker 8 Carlson, had to leave his home, how did that make you 9 feel? 10 A. It's -- it's -- it's frightening and 11 infuriating. And, certainly, I was very concerned. 12 Q. As you sit here today, and in light of the 13 multiple questions and answers and things that you've had 14 to consider, are you aware of any statements that you've 15 made or stories that you've posted on the Gateway Pundit 16 that you now would like to retract? 17 A. No, not at this time. 18 Q. If someone brings forward evidence to you that 19 something you have said or reported as a fact is untrue, 20 do you stand ready to -- to publish that correction 21 immediately? 22 A. Yes. 23 Q. During the entire course of this litigation -- I 24 think you mentioned that some lawyer wrote to you about a 25 story or two that you took down?</p> <p style="text-align: right;">Page 141</p>

<p>1 A. Yes.</p> <p>2 Q. All right. Has anyone asked you to take down</p> <p>3 your allegations that Eric Coomer is an Antifa operative?</p> <p>4 A. No.</p> <p>5 Q. Has anyone asked you to take down the allegation</p> <p>6 that Eric Coomer posted the Antifa manifesto the day it</p> <p>7 came out?</p> <p>8 A. No.</p> <p>9 Q. Has anyone asked you to take down your</p> <p>10 screenshots of Eric Coomer's -- what you've purported to</p> <p>11 be Eric Coomer's social media?</p> <p>12 A. No.</p> <p>13 Q. Has anyone brought to you an alternate theory</p> <p>14 for what motivations Eric Coomer could have for</p> <p>15 participating so vigorously in supporting the Antifa</p> <p>16 agenda?</p> <p>17 A. No.</p> <p>18 Q. What do you conclude from his support of Antifa</p> <p>19 that his motivations are?</p> <p>20 A. It appears very clear where -- what me felt</p> <p>21 about conservatives, what he felt about the country, what</p> <p>22 he felt about what he wanted to do to people who supported</p> <p>23 something he doesn't believe in. So very threatening.</p> <p>24 Q. This will probably be my last series of</p> <p>25 questions, very short.</p> <p style="text-align: right;">Page 142</p>	<p>1 A. I believe it's a very dangerous group.</p> <p>2 Q. Is it important for you to report on people who</p> <p>3 are involved with that dangerous group? Or can it be?</p> <p>4 A. It can be. If that person has a significant</p> <p>5 role in society, that's newsworthy.</p> <p>6 Q. But for Eric Coomer's role as the security</p> <p>7 director and salesman and expert witness for</p> <p>8 Dominion Voting Systems, would you have ever been</p> <p>9 interested in reporting on his apparent Antifa ties?</p> <p>10 A. No, not unless he was involved in a violent</p> <p>11 incident.</p> <p>12 MR. CORPORON: I have nothing further.</p> <p>13 MR. SKARNULIS: I want to reiterate -- reiterate my</p> <p>14 objection to that whole questioning of Mr. Hoft by</p> <p>15 Mr. Corporon. While it raises follow-up questions, I'm</p> <p>16 going to decline to ask any. And so I pass the witness.</p> <p>17 MR. CORPORON: Appreciate your courtesy today,</p> <p>18 Steve.</p> <p>19 MR. SKARNULIS: Of course, Randy.</p> <p>20 THE VIDEOGRAPHER: This concludes the deposition</p> <p>21 of Jim Hoft individually and as the corporate</p> <p>22 representative TGP Communications. Going off the record.</p> <p>23 The time is 3:23.</p> <p>24 MR. ZAKHEM: This is Zakhem. I'd like an</p> <p>25 electronic transcript.</p> <p style="text-align: right;">Page 144</p>
<p>1 You've done significant reporting on Antifa over</p> <p>2 your career at Gateway Pundit; correct?</p> <p>3 A. Yes.</p> <p>4 Q. Have you read the reporting that Andy Ngô has</p> <p>5 done on Antifa?</p> <p>6 A. Yes.</p> <p>7 Q. Do you understand them -- you were asked if you</p> <p>8 found it surprising that Antifa would be on a covert phone</p> <p>9 call. Is it your belief that Antifa is a decentralized</p> <p>10 organization?</p> <p>11 A. I believe they have several branches in several</p> <p>12 locations across the country.</p> <p>13 Q. Do they operate covertly?</p> <p>14 A. Yes.</p> <p>15 Q. We've heard some politicians and others say that</p> <p>16 Antifa is just simply an idea. Do you believe that to be</p> <p>17 true?</p> <p>18 A. Much more than an idea.</p> <p>19 Q. Are they extremely violent?</p> <p>20 A. Absolutely.</p> <p>21 Q. Do they operate with clandestine cells?</p> <p>22 A. Yes.</p> <p>23 Q. Do you believe that it's very important to</p> <p>24 expose anyone who affiliates with Antifa's belief system</p> <p>25 or activities?</p> <p style="text-align: right;">Page 143</p>	<p>1 (Whereupon, the video record was concluded.)</p> <p>2 MS. HALL: There is Andrea Hall, Sara. I would</p> <p>3 like one as well.</p> <p>4 MS. BOEHMER: This is Margaret Boehmer for Eric</p> <p>5 Metaxas. I'd like act e-tran, please.</p> <p>6 MR JOHNSON: Brandon Johnson for OAN and Chanel</p> <p>7 Rion. I'd like an e-transcript as well.</p> <p>8 MR. CORPORON: Corporon for the deponent. Four</p> <p>9 to a page, full concordance, please.</p> <p>10 MR. ARRINGTON: Barry Arrington for</p> <p>11 Sidney Powell. Electronic transcript, please.</p> <p>12 THE REPORTER: Anybody else? Okay. Thank you.</p> <p>13 And, Mr. Skarnulis, I have your standing order.</p> <p>14 * * * * *</p> <p>15 WHEREUPON, the foregoing deposition was</p> <p>16 concluded at 3:24 p.m. Total time on the record was</p> <p>17 3 hours and 50 minutes.</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 145</p>

<p>1 I, JAMES HOFT, the deponent in the above deposition, 2 do hereby acknowledge that I have read the foregoing 3 transcript of my testimony, and state under oath that it, 4 together with any attached Amendment to Deposition pages, 5 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 JAMES HOFT 12 13 Subscribed and sworn to before me this _____ day of 14 _____, 20____. 15 My commission expires: _____. 16 17 _____ 18 NOTARY PUBLIC 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 146</p>	<p>1 Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc. 2 James Hoft , Corp Rep Job No. 4708849 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 James Hoft , Corp Rep Date 25</p> <p style="text-align: right;">Page 148</p>
<p>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 SARA A. STUEVE 21 Registered Professional Reporter 22 Notary Public, State of Colorado 23 24 25</p> <p style="text-align: right;">Page 147</p>	<p>1 rbc@corporonlaw.com 2 August 13, 2021 3 Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc. 4 DEPOSITION OF: James Hoft , Corp Rep 4708849 5 The above-referenced witness transcript is 6 available for read and sign. 7 Within the applicable timeframe, the witness 8 should read the testimony to verify its accuracy. If 9 there are any changes, the witness should note those 10 on the attached Errata Sheet. 11 The witness should sign and notarize the 12 attached Errata pages and return to Veritext at 13 errata-tx@veritext.com. 14 According to applicable rules or agreements, if 15 the witness fails to do so within the time allotted, 16 a certified copy of the transcript may be used as if 17 signed. 18 Yours, 19 Veritext Legal Solutions 20 21 22 23 24 25</p> <p style="text-align: right;">Page 149</p>

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

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

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6:21



Joe Oltman @



Wed, May 5

Influencer event in denver May 26th. Rally may 27th. You need to be here for it . One Voice.

May 5 7:50 PM

Thu, Jun 10

Hey Jim. I have some information that I got from my daughter who works as a cyber engineer at Raytheon. The CEO put out a video praising Pride month George Floyd's death, The Tulsa race massacre and a bunch of other propaganda but left out DJ and nearly 30% of their workforce is retired military

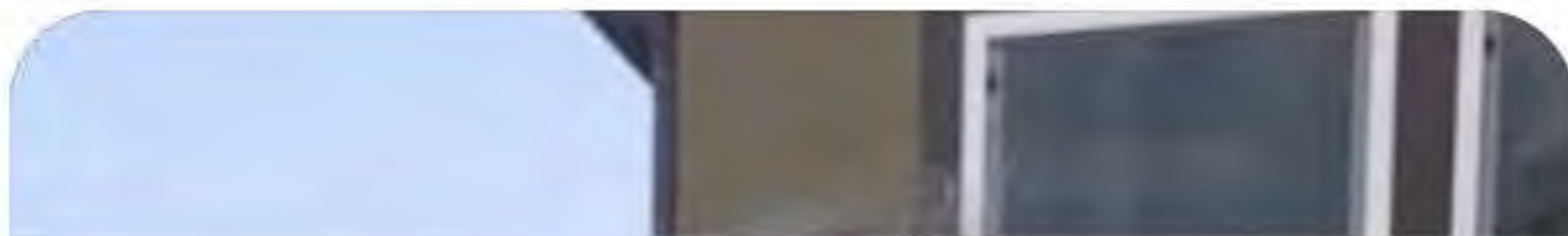
D day

Jun 10 7:05 PM

Wow

Jun 10 11:18 PM

Sunday



New Message



6:21



Joe Oltman @



Wow

Jun 10 11:18 PM



Sunday



Jennifer Morrell

This is at Eric Coomer's house



New Message



6:21



Joe Oltman @



This is at Eric Coomer's house



Pretty in Pink: The secretary of state's Melissa Polk and

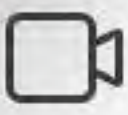


New Message





Joe Oltman @



Another at Eric Coomer's house



Lynn Bartels
Pretty in Pink: The secretary of state's Melissa Polk and Jennifer Moreel with Democracy Fund.

Timeline Photos · Aug 22, 2018 ·
View Full Size · More Options

Like

Share

8

August 22, 2018



Lynn Bartels
What a team. Steven Bennet and Eric Coomer from Dominion Voting Systems. Such great, capable guys.

Timeline Photos · Aug 22, 2018 ·



New Message





Joe Oltman @



Eric Coomer holding a party at his house with County Clerks of Colorado

Sun 6:35 PM

Wow!! Where did you see that?

Sun 6:36 PM



I have been doing research on all of them

Saw your article and it clicked. "Holy crap she was at his house

Sun 6:36 PM



New Message



That's huge

Sun 6:37 PM

Also. The judge in the Coomer case, who has been breaking all the procedural rules and acting as a proxy for them.. she participated in the June 2020 Antifa/BLM March in denver

Moses...

Sun 6:38 PM

Wow!! You got proof of that? That's big!! Too

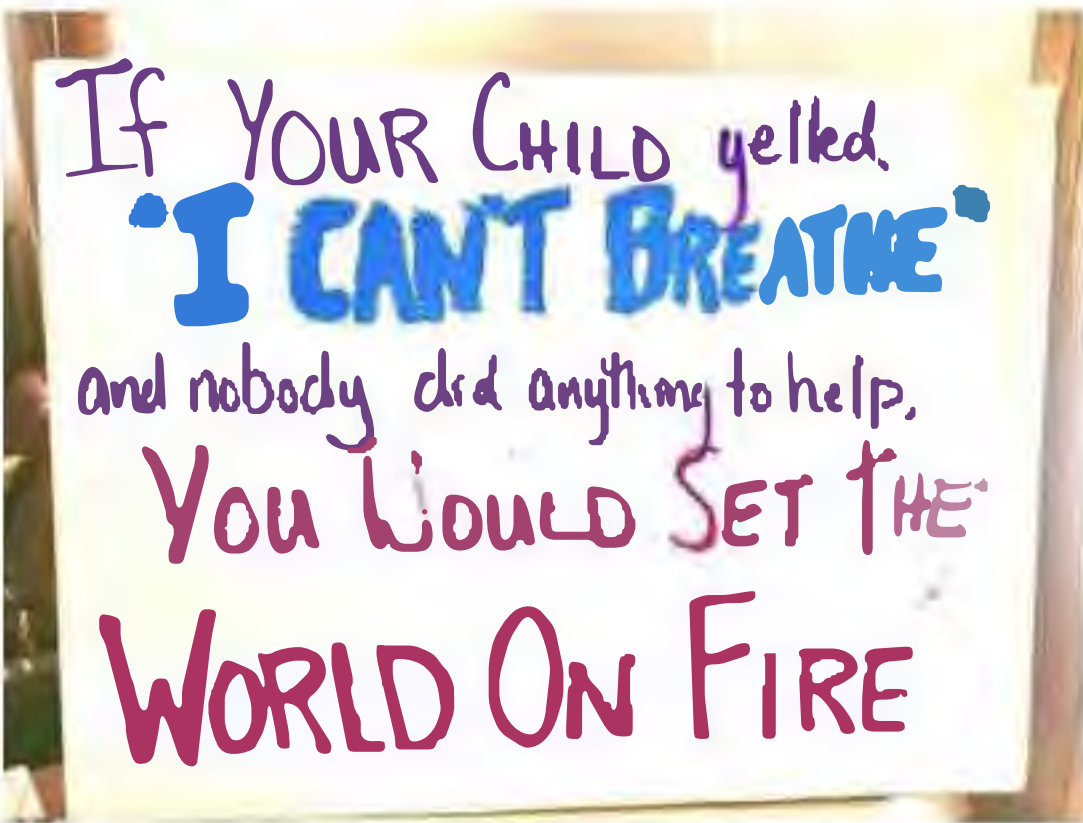
Sun 6:39 PM



Staci Neal Wright

Jun 5, 2020

Saw this from Marie Avery Moses and it hit home... yes, yes I would... 1,000%



42 23 Comments 5 Shares

Like

Comment

Share



Joe Oltman @



She made this sign.

They cleaned the internet but missed this one

I had a lawyer friend of mine that came forward and told me, she was so far left in her posts on Facebook she wondered how she got chosen

It's not snocking these two "heroes" were born on the same day! Although I really admire and respect the Senator, I'm an even bigger fangirl of the smart, beautiful, kind and generous Marie Avery Moses! Happy 50th Birthday! Welcome to the Club, lady! ❤️

friend, and brilliant legal mind, Marie Avery Moses, has been nominated as a finalist for the Denver District Court bench. If selected by the Governor, I know that Marie will make a tremendous judge and public servant. Best wishes, Marie!!!
... See More



  Lorna Hilt Horton and 21 others

3 Comments

Couple others

Look I'm really sorry you got sued Jim. I feel terrible, but I never lied, embellished or even remotely stretched the truth and the price I have paid for me and my family has been immense. Just thought I would tell you that...



This Antifa stuff runs deep



New Message



This Antifa stuff runs deep





Joe Oltman @



This is Eric's house



New Message





Joe Oltman @



Lynn Bartels
Sorry the sun made this picture so dark. Check out Hilary Rudy with the SOS office, Mesa County Clerk Sheila Reiner, Boulder County Clerk Hillary Hall and Arapahoe County Clerk Matt Crane.

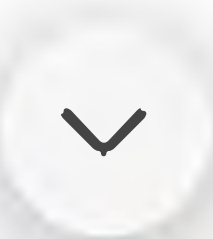
Timeline Photos · Aug 22, 2018 ·
[View Full Size](#) · [More Options](#)

Like

Share

23

Matt crane was there too
Sun 6:48 PM



New Message



6:22



Joe Oltman @



We wrote on him

Sun 6:52 PM

You did

They are all connected...

Sun 6:54 PM

That's really big!!

Sun 7:38 PM

I just lost my mind on a live video

It's been 9 months of hell.

I have so much more

The judge is a piece of trash.

Sun 7:39 PM

Would like to hear more

Sun 7:40 PM

I can deliver the attorney that gave me access. But she has to be anonymous



Lynn Bartels is with Eric Coomer and 13 others
August 22, 2018

The wind was well, windy, but the food was at the Colorado County Clerks Association summer conference in Salida, where we went to a BBQ Check out these fun folks, from Dwight Shellman to Debra Johnson to Hayle Johnson County clerks and their staffs are some of the hardest working people in government so when they unwind, they unwind.



New Message





Sure
Sun 8:43 PM

Tuesday



New Message





Did you know that in Portland the DAs house and office are protected by Antifa?

Tue 1:46 PM

No - insane!
Tue 6:12 PM

From head of PB who stood over a church... :

We need the entire story. DA and police team up with Antifa to create their own mafia style crime syndicate. Police serve as proxy for Antifa arresting those who defend churches and the

6:23



Joe Oltman @



From head of PB who stood over a church... :

We need the entire story. DA and police team up with Antifa to create their own mafia style crime syndicate. Police serve as proxy for Antifa arresting those who defend churches and the parishioners.

Thx for checking Bro 5:29 PM ✓

👉 yeah man! 5:31 PM

Unread Messages

Today

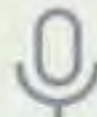
Hey I just wanted to let you know that my cousin in PPD just called me and told me if we are going to the pastor event to be careful because antifa is going to be there in force and the DA has ordered PBs be arrested first.

8:49 AM

I do believe that. 10:33 AM ✓



Message



The things they were telling me were unbelievable.

Tue 6:14 PM



New Message



6:23



Joe Oltman @



going to be there in force and the DA has ordered PBs be arrested first.

8:49 AM

I do believe that.

10:33 AM ✓



Message



The things they were telling me were unbelievable.

Tue 6:14 PM

Insane

Tue 6:14 PM ✓

I saw your stories

You should know Jena Griswold did not even show up to the public comment today.

In colorado

Sent a group as her proxy

For their "emergency rules" change

Tue 6:15 PM

Wow

Tue 10:53 PM ✓



New Message



IOS IMESSAGE/SMS/MMS

CHAT PARTICIPANTS	
Number of participants	3
Display names	+14042855853 Jenny Beth Martin (+14042855853) Local User
Local user	
CONVERSATION DETAILS	
Number of messages	64
First message sent date/time	11/13/2020 1:01:20 PM
Last message sent date/time	6/19/2021 1:27:07 AM
Case time zone	(UTC) Coordinated Universal Time

+14042855853

↔ Unknown direction
11/16/2020 1:10:57 AM

May I introduce you to Randy Corporon in Denver?

You have a story about one of his clients and something about dominion. He said some of the details are not correct and he wants to help get the details correct.

Exhibit
PX 0076
Hoft

IOS IMESSAGE/SMS/MMS

CHAT PARTICIPANTS	
Number of participants	3
Display names	+13038852550 +14042855853 Local User
Local user	
CONVERSATION DETAILS	
Number of messages	3
First message sent date/time	11/16/2020 1:43:33 AM
Last message sent date/time	11/16/2020 2:31:25 AM
Case time zone	(UTC) Coordinated Universal Time

+13038852550

↔ Unknown direction
11/16/2020 1:44:27 AM

Thx, JB. Hi, Jim. I'll text you privately re Dominion so JB can get back to work.

Exhibit
PX 0077
Hoft

IOS IMESSAGE/SMS/MMS

CHAT PARTICIPANTS	
Number of participants	2
Display names	+13036675105
	Local User
Local user	
CONVERSATION DETAILS	
Number of messages	14
First message sent date/time	11/16/2020 2:15:31 AM
Last message sent date/time	11/25/2020 5:31:16 AM
Case time zone	(UTC) Coordinated Universal Time

Local User <Jim iPad_00008101-000C44900CA0001E>

↔ Unknown direction
11/24/2020 4:30:55 AM

This is Jim Hoft — Joe has anyone seen Eric Coomer? Does anyone know where he is? Has he popped his head up at all?

Exhibit
PX 0078
Hoft

IOS IMESSAGE/SMS/MMS

CHAT PARTICIPANTS	
Number of participants	2
Display names	+13038852550
	Local User
Local user	
CONVERSATION DETAILS	
Number of messages	41
First message sent date/time	11/16/2020 2:08:33 AM
Last message sent date/time	3/8/2021 2:49:36 PM
Case time zone	(UTC) Coordinated Universal Time

+13038852550

↔ Unknown direction
12/23/2020 4:02:54 PM

Hey, Jim. I'm doing morning drive in Denver tomorrow. Any time for radio on Coomer lawsuit and your reporting?

Exhibit
PX 0079
Hoft

IOS IMESSAGE/SMS/MMS

CHAT PARTICIPANTS	
Number of participants	2
Display names	13036675105 Local User
Local user	
CONVERSATION DETAILS	
Number of messages	14
First message sent date/time	11/16/2020 2:15:31 AM
Last message sent date/time	11/25/2020 5:31:16 AM
Case time zone	(UTC) Coordinated Universal Time

Local User <Jim iPad_00008101-000C44900CA0001E_2>

↔ Unknown direction
11/24/2020 4:30:55 AM

This is Jim Hoft — Joe has anyone seen Eric Coomer? Does anyone know where he is? Has he popped his head up at all?

Exhibit
PX 0080
Hoft

IOS IMESSAGE/SMS/MMS

CHAT PARTICIPANTS	
Number of participants	3
Display names	+13038852550 +14042855853 Local User
Local user	
CONVERSATION DETAILS	
Number of messages	3
First message sent date/time	11/16/2020 1:43:33 AM
Last message sent date/time	11/16/2020 2:31:25 AM
Case time zone	(UTC) Coordinated Universal Time

+14042855853

Jim, meet Randy Corporon. Randy, meet Jim Hoft. I'll let you take it from here.

↔ Unknown direction
11/16/2020 1:43:33 AM

Exhibit
PX 0081
Hoft

IOS IMESSAGE/SMS/MMS

CHAT PARTICIPANTS	
Number of participants	2
Display names	+13038852550
	Local User
Local user	
CONVERSATION DETAILS	
Number of messages	41
First message sent date/time	11/16/2020 2:08:33 AM
Last message sent date/time	3/8/2021 2:49:36 PM
Case time zone	(UTC) Coordinated Universal Time

+13038852550

↔ Unknown direction
11/16/2020 2:08:33 AM

Hi Jim. Randy Corporon, Rep Natl Committeeman, Chair of largest Tea Party group in CO, atty, radio host.

My client/friend Joe Oltmann just told me you guys are talking in 15 so that will handle what I wanted to talk about.

Thank you!

Exhibit
PX 0082
Hoft

IOS IMESSAGE/SMS/MMS

CHAT PARTICIPANTS	
Number of participants	2
Display names	+13038852550
	Local User
Local user	
CONVERSATION DETAILS	
Number of messages	41
First message sent date/time	11/16/2020 2:08:33 AM
Last message sent date/time	3/8/2021 2:49:36 PM
Case time zone	(UTC) Coordinated Universal Time

Local User <Jim iPad_00008101-000C44900CA0001E>

Ok thanks Randy. We just spoke. Quite a story he has!

↔ Unknown direction
11/16/2020 2:30:54 AM

Exhibit
PX 0083
Hoft

IOS IMESSAGE/SMS/MMS

CHAT PARTICIPANTS	
Number of participants	2
Display names	+13038852550
	Local User
Local user	
CONVERSATION DETAILS	
Number of messages	41
First message sent date/time	11/16/2020 2:08:33 AM
Last message sent date/time	3/8/2021 2:49:36 PM
Case time zone	(UTC) Coordinated Universal Time

+13038852550

↔ Unknown direction
11/16/2020 2:35:58 AM

Yes. And, he understands the technology, code, back-door access even though we don't have any proof of that. Sounds like Rudy and Sidney Powell do though. I'm trying not to bug her. But she has said specifically that votes were switched. God bless whistleblowers?!

Exhibit
PX 0084
Hoft

IOS IMESSAGE/SMS/MMS

CHAT PARTICIPANTS	
Number of participants	2
Display names	+13036675105
	Local User
Local user	
CONVERSATION DETAILS	
Number of messages	14
First message sent date/time	11/16/2020 2:15:31 AM
Last message sent date/time	11/25/2020 5:31:16 AM
Case time zone	(UTC) Coordinated Universal Time

+13036675105

I sent someone to his house and no sign of him

↔ Unknown direction
11/24/2020 4:32:15 AM

Exhibit
PX 0085
Hoft

Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipulate the Vote

By Jim Hoft

Published November 13, 2020 at 7:55am

632 Comments



Eric Coomer

Director Product
Strategy & Security,
Dominion Voting
Systems

Dr. Eric Coomer who is responsible for the strategy and Security of Dominion Voting Systems at Dominion Voting Systems.

But if you search the company's profile Eric Coomer has since been removed from their page of directors.

<https://archive.is/z87aG>

Shrmcp Beth McCauley
HR Manager
Dominion Voting Systems
[VIEW FULL PROFILE](#)

Paul Janicki
Global IT Director
Dominion Voting Systems
[VIEW FULL PROFILE](#)

Kevin Defries
Manager of Proposals and Marketing
Dominion Voting Systems
Denver, Colorado
[VIEW FULL PROFILE](#)

Matthew Horace
Vice President & Chief Security Officer
Dominion Voting Systems
Denver, Colorado
[VIEW FULL PROFILE](#)

Rick Grant
Director, Supply Chain
Dominion Voting Systems
Denver, Colorado
[VIEW FULL PROFILE](#)

Eric Coomer
Director, Product Strategy
Dominion Voting Systems
Denver, Colorado
[VIEW FULL PROFILE](#)

Full Profile Information
+
Social Network Profiles
[Twitter](#) [LinkedIn](#) [Facebook](#) [Google+](#)
+
Email
+
See who you both know in common

In 2016 Coomer **told the Illinois States Board of Elections** that it was possible to bypass election systems software.



(Sep. 1, 2016) — On Friday, August 26th, during a meeting at the Illinois State Board of Elections, the Vice President of Engineering for Dominion Voting, Dr. Eric Coomer*, was asked if it was possible to bypass election systems software and go directly to the data tables that manage systems running elections in Illinois. His response was, “Yes, if they have access.”



Here is more from the 2016 article at [the Post and Email](#):

Dr. Coomer’s statement brings to light a very serious issue all voters should understand. Voting systems must be re-certified each time they make changes to the hardware or software. Recertification is an expensive and time consuming process. ***What Dr. Coomer told the Board is that Dominion Voting does not go back for recertification of software when threats to their code are discovered.*** Rather, they rely on post-election audits and providing advice to election jurisdictions about security. I have reviewed all of the recertification documents produced by Dominion, and I do not recall any software adjustments for security purposes.

This is the reality of the security of your vote. Software systems that count and record the vote across Illinois and throughout the USA are not updated to address security problems, and even if they were, the software can be completely bypassed by going to the data tables that drive the systems.

Here is the video...

Dominion was written about by the Clinton Global Initiative.

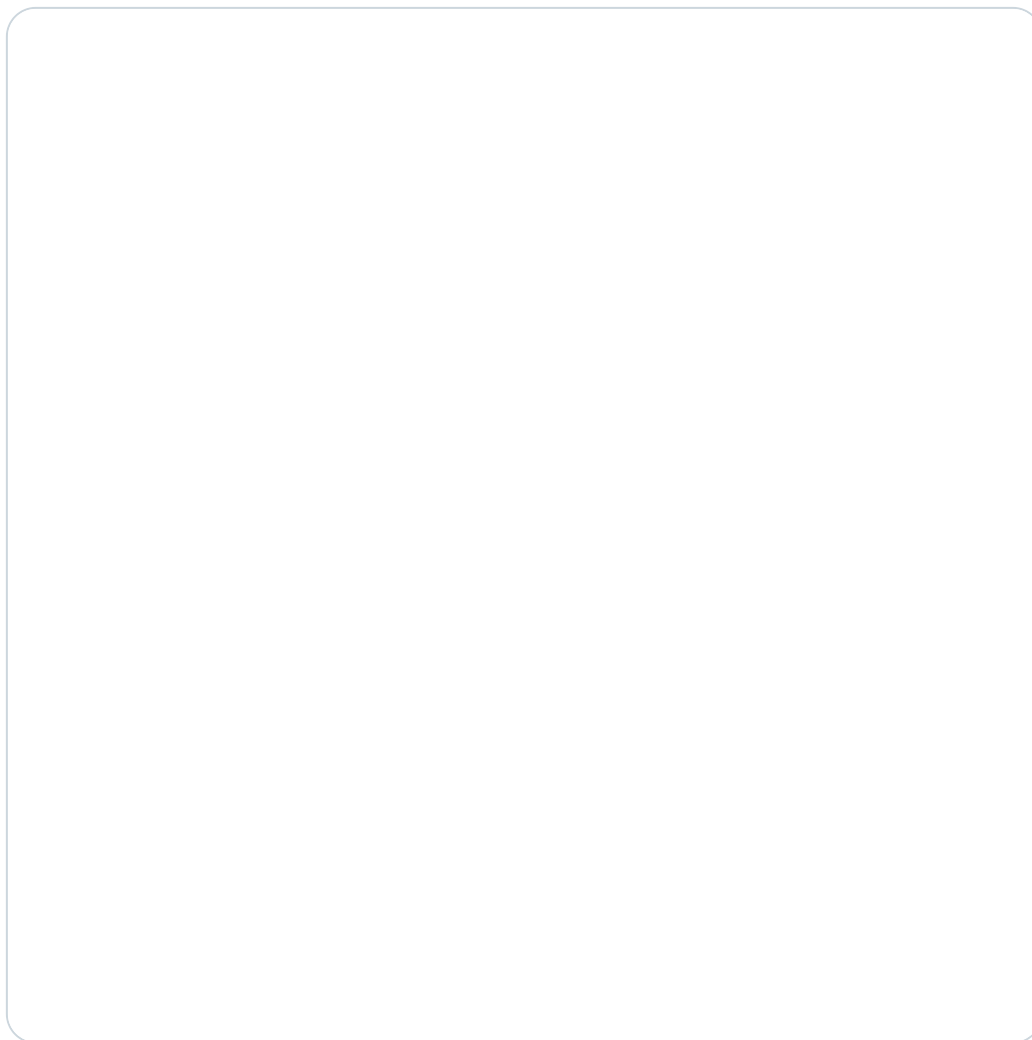
The AP mentioned Coomer in their September article.



President elect Julie Fox
@jlfgetserious



AP article on the Georgia machines from sept 29,2020, exec with dominion



7:51 PM · Nov 12, 2020



52



46 people are Tweeting about this

More...

Entrepreneur **Joe Oltmann** researched the Dominion Voting Systems this week after news broke on the unexplained **computer “glitches” that mysteriously took votes** from President Trump in many states and gave those votes to Joe Biden or erased the votes completely.

Joe Oltmann did a deep dive on Dr. Eric Coomer who is responsible for the strategy and Security of Dominion Voting Systems.

Oltmann posted a Facebook post by Coomer from June.

Dr. Coomer retweeted the “Antifa” manifesto letter to President Trump.

Needless to say Dr. Coomer is NOT a Trump supporter!

This is a FB post from Dr. Eric Coomer. This is the Antifa “manifesto” letter to Trump. This is the man that is responsible for the strategy and Security of Dominion Voting Systems. I will post all of the posts here over the next couple of days. Share and follow pic.twitter.com/E2rK9TznVw

*– Joe Oltmann (@JoeOltmann) **November 12, 2020***

Here is that letter:

page 2

page 3

page 4

Joe Oltmann also posted other anti-Trump Facebook posts by Dr. Coomer including a YouTube video titled “Dead Prez.”

Twitter removed Joe Oltmann’s account last night for some reason.

It is very interesting that Twitter would remove the one account that was investigating Coomer, his far left background and his role at Dominion.

Submit a Correction



Jim Hoft

More Info	Recent Posts	Contact
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Jim Hoft is the founder and editor of The Gateway Pundit, one of the top conservative news outlets in America. Jim was awarded the Reed Irvine Accuracy in Media Award in 2013 and is the proud recipient of the Breitbart Award for Excellence in Online Journalism from the Americans for Prosperity Foundation in May 2016.

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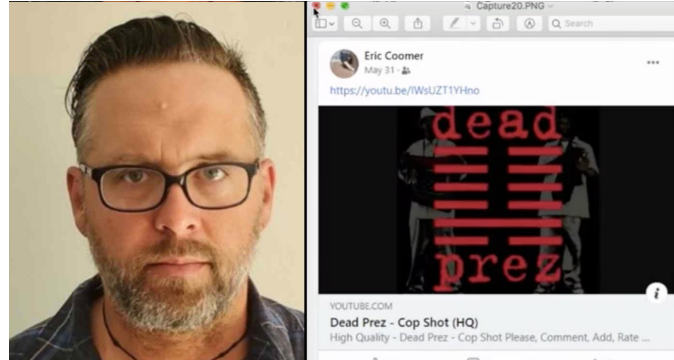
[Contact](#)

Report: Anti-Trump Dominion Voting Systems Security Chief Was Participating in Antifa Calls, Posted Antifa Manifesto Letter to Trump Online

By Jim Hoft

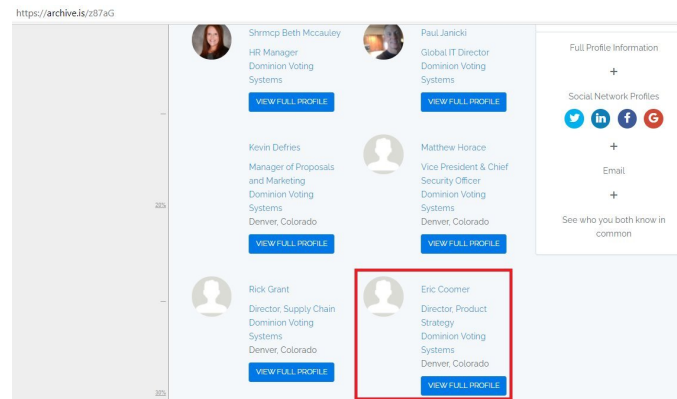
Published November 14, 2020 at 9:21pm

878 Comments



In 2010 Eric Coomer joined Dominion as Vice President of U.S. Engineering. According to his [bio](#), Coomer graduated from the University of California, Berkeley with a Ph.D. in Nuclear Physics.

Eric Coomer was later promoted to Voting Systems Officer of Strategy and Security although Coomer has **since been removed** from the Dominion page of directors.



In a stunning interview conducted by **Michelle Malkin**, **Joe Oltmann**, FEC (Faith Education Commerce) United founder, reveals how he infiltrated Antifa and how during a conversation with Antifa members, he discovered “Eric from Dominion” was allegedly part of the chat during the week of September 27, 2020.

Oltmann explained that “Eric” was telling the Antifa members they needed to “keep up the pressure.” When one of the caller’s asked, “Who’s Eric?” someone answered, “Eric, he’s the Dominion guy.” Oltmann said that as the conversation continued, someone asked, “What are we gonna do if F*cking Trump wins?” Oltmann paraphrased how Eric (the Dominion guy) responded, **“Don’t worry about the election, Trump’s not gonna win. I made f*cking sure of that!”**

After Oltmann, who runs a data company, finished the call, he started to

Exhibit
PX 0087
Hoft

investigate “Eric from Dominion,” in Denver, CO., and came upon Eric Coomer. Oltmann admitted that it didn’t make sense that Eric Coomer would be the Antifa member on the call and that at the time, he knew nothing about Dominion Voting Systems.

It wasn’t until after he started hearing about Dominion Voting Systems in the news following the election that he remembered the remarks made by “Eric from Dominion” on the Antifa chat.

Oltmann began digging into Eric Coomer, trying to find anything he could about him. Oltmann finally **hit gold when he was able to (legally) access** what he claims is Dominion VP, Eric Coomer’s Facebook page. What he found was stunning. Joe Oltmann said he never saw such hate and vitriol coming from someone who has a Ph.D. in Nuclear Physics. Oltmann explained to Malkin that Coomer actually re-posted the Antifa manifesto to President Trump on his Facebook page.

Do you think Dominion was in on the steal?

☐ Yes ☐ No

Enter your email

Submit

Completing this poll entitles you to The Gateway Pundit news updates free of charge. You may opt out at anytime. You also agree to our [Privacy Policy](#) and [Terms of Use](#).

The Gateway Pundit posted a copy of **that Antifa letter to Trump** in a previous report.

Joe Oltmann was removed from Twitter this week. His tweets on Eric Coomer upset big tech.

Oltman admits that by revealing this information about Coomer, he is putting himself in danger.

He may have a Ph.D. in Nuclear Physics, but when it comes to hiding his hatred for President Trump, Trump supporters, law enforcement, or even for Texans, Dominion’s Eric Coomer isn’t very smart.

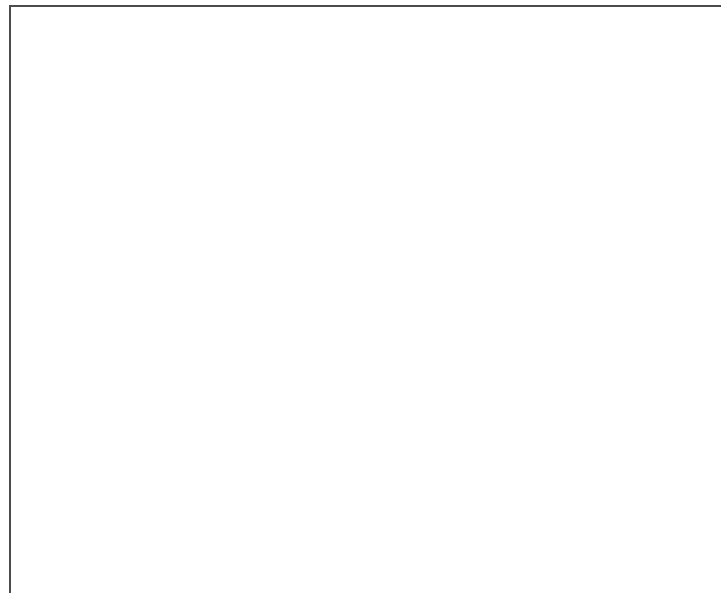
In 2017, when Coomer was in Nevada, he mocked President Trump’s Election Integrity Commission on Facebook.

Coomer shared a **Washington Post** article titled, “The voting commission is a fraud itself. Shut it down.” The article, written by the unhinged Trump hater Jennifer Rubin, was an attack on President Trump’s May 11, 2017, **Executive**

Order on the Establishment of Presidential Advisory Commission on Election Integrity.

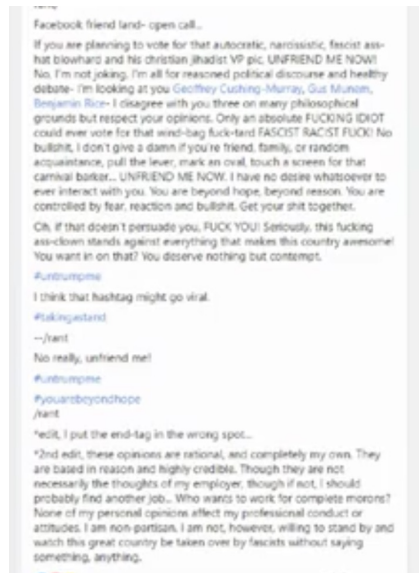
What about Trump's Election Integrity Commission triggered Coomer? Was it the part about "Vulnerabilities in *voting systems* and practices used for Federal elections that could lead to improper voter registrations and *improper voting*, including fraudulent voter registrations and *fraudulent voting*," that caused Coomer to have a childish meltdown on his Facebook page?

Dominion's Director of Strategy and Security's response to Rubin's article appears to be a bit unhinged: "And in other news...There be some serious fuckery going on right here fueled by our Cheeto-in-chief stocking lie after lie on the flames of [former Kansas Sec. of State Chris] Kobach...You want something serious to worry about? This is it. "



Here's what Coomer had to say to his "friends" on Facebook on July 21, 2016, who are Trump supporters.





From Coomer's Facebook post:

Facebook friend land- open call-

If you are planning to vote for the autocratic, narcissistic, fascists, ass-hat blowhard and his Christian jihadist VP pic, UNFRIEND ME NOW! No, I'm not joking. I'm all for reasoned political discourse and healthy debate- I'm looking at you (3 names of friends). I disagree with you three on many philosophical grounds but respect your opinions. Only and absolute FUCKING IDIOT could ever vote for that wind-bag fuck-tard FASCIST RACIST FUCK! No bullshit, I don't give a damn if you're friend, family, or random acquaintance, pull the lever, mark an oval, touch a screen for that carnival barker--UNFRIEND ME NOW. I have no desire whatsoever to ever interact with you. You are beyond hope, beyond reason. you are controlled by fear, reaction, and bullshit. Get your shit together.

Oh, it that doesn't persuade you, FUCK YOU! Seriously, this fucking ass-clown stands against everything that makes this country awesome! You want in on that? You deserve nothing but contempt.

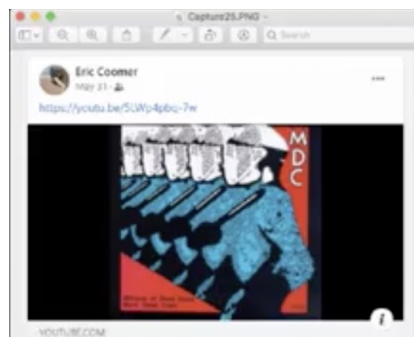
Near the bottom of his rant, Coomer clarifies: "These opinions are rational and completely my own. They are based in reason and highly credible. Though they are not necessarily the thoughts of my employer, though if not, I should probably find another job. Who wants to work for complete morons?" Comer appears to be trying to cover his tracks, "None of my personal opinions affect my professional conduct or attitudes," adding, "I am non-partisan."



According to Oltmann, Eric Coomer isn't a big fan of the police. During his interview with Malkin, he shared several screenshots of anti-police rhetoric like an image a link to YouTube from the hip-hop song "Dead Prez."

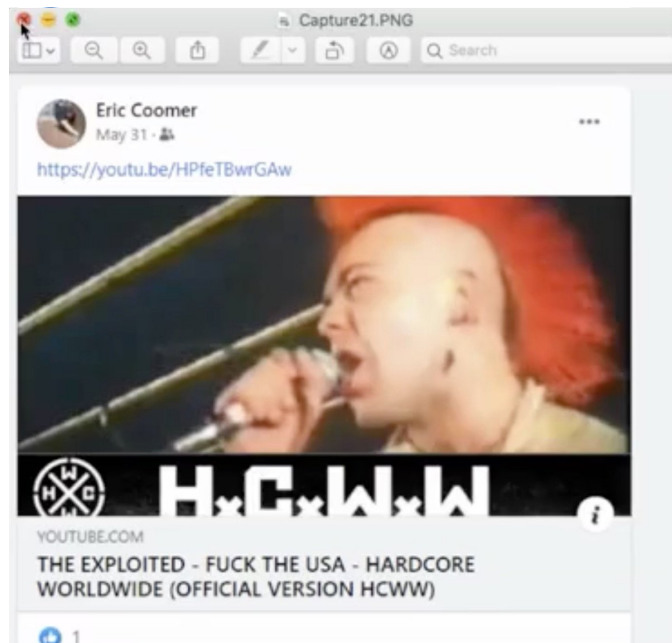
Here's a portion of the lyrics from the "Dead Prez" song in case it's not on your personal playlist:

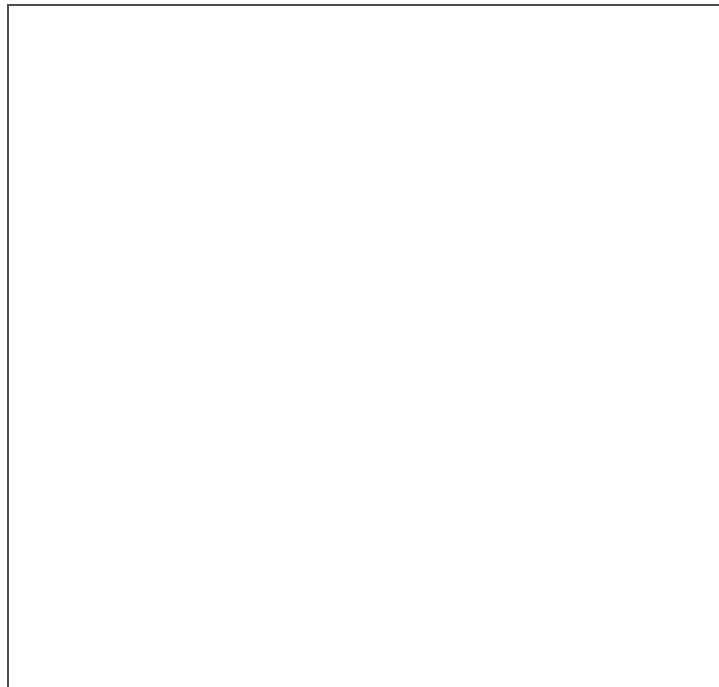
Is there heaven for us hip-hop heathens
Big Pop and Pac, even Eazy had 'em leanin'
We all children lookin' for a reason
What do you believe in, betrayal, treason?
I'm out for dead presidency
I'm out for dead presidency
I'm out for dead presidency
I'm out for dead fuckin' presidents that represent me





This screenshot, captured by Joe Oltmann, makes one wonder if Eric's not a fan of the United States either.





**A lot of people may be glad to know that Texas rejected using
Dominion Voting Systems in their state after reading this garbage!**

**30 states in America, including every critical swing state in the
November election, used Dominion Voting Systems.**

[Submit a Correction](#)



Jim Hoft

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Jim Hoft is the founder and editor of The Gateway Pundit, one of the top conservative news outlets in America. Jim was awarded the Reed Irvine Accuracy in Media Award in 2013 and is the proud recipient of the Breitbart Award for Excellence in Online Journalism from the Americans for Prosperity Foundation in May 2016.

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Georgia Secretary of State Brad Raffensperger's Update to Georgia's Voting Machine Software Right Before the 2020 Election Was Unlawful and Violates Any Certification of State Results

By Joe Hoft

Published January 4, 2021 at 8:15am

424 Comments



Georgia's corrupt Secretary of State Brad Raffensperger is in criminal trouble now after leaking a phone call with the President of the United States.

Raffensperger is also responsible for approving an update to the voting machines in the state days before

the 2020 election which was illegal and should invalidate the results of the election in the state.

Yesterday it was reported that Georgia's corrupt Secretary of State (SoS) Brad Raffensperger is the party to two lawsuits from the President of the United States after leaking information related to their recent phone call:

President Trump Files Two Lawsuits Against Dirty Georgia Secretary of State Raffensperger for Leaking Confidential Litigation Call



But quite frankly, Raffensperger has done much worse. The Georgia SoS is to ensure secure and accurate elections. And, yet he allowed Dominion voting machines to be used in the 2020 Presidential election opening the door to blatant discrepancies and fraud.

But it gets worse... Raffensperger actually allowed an update to the software used in these Dominion voting machines only days before the 2020 election.

We reported on this weeks ago:

Dominion's Trump-Hating Executive Eric Coomer Performed a Suspicious Update in Georgia a Week Before Early Voting Started

As we noted, a local news channel actually reported on this update:

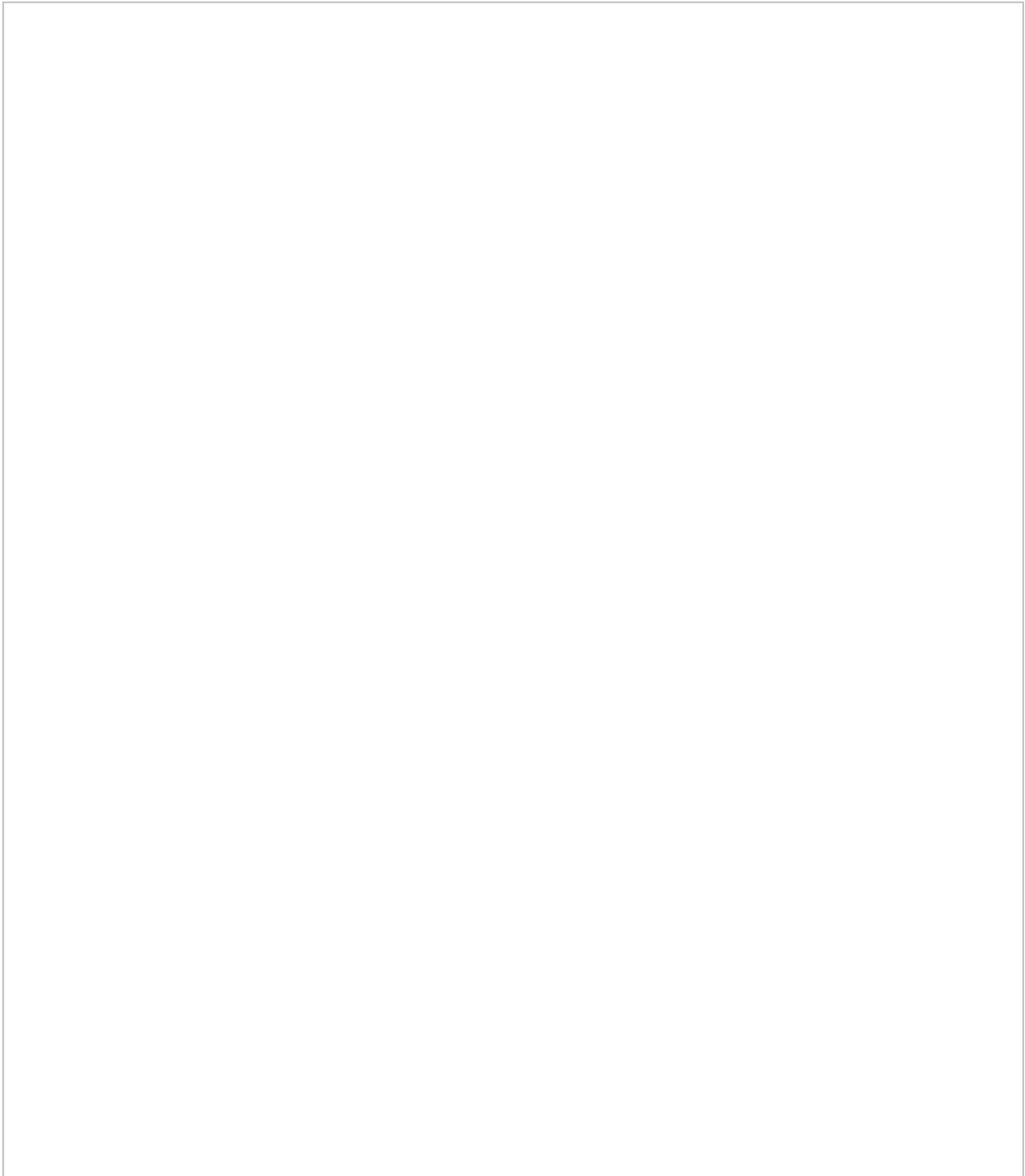
CD Media reports that the update was to the imaging system in Dominion's machines:

*After the election equipment is certified for use, **no changes can be made to the software or hardware without SoS and EAC approval and maintain the certification for the election.***

According to a 2020 election lawsuit filed in GA, during September 2020 ahead of the general election GA SoS Raffesperger ordered county election officials to do a complete software wipe of the BMDs [Ballot Marketing Devices] and install brand new software that never went through the certification process. ***As of the October 2nd report, Dominion had not submitted a request for this major change with the U.S. Election Assistance Commission (EAC).***

*According to the Master Technical Evaluation listed above, both Dominion and the GA SoS are very clear on the fact that **this breaks the certification for GA and may well get the ballots voters cast tossed as a result.** The new software was never even tested to see if it caused other issues with the system.*

***GA SoS Raffensperger ordered counties to make the change knowing it is illegal in GA and puts the onus of liability on the county election managers themselves if they complied.** This email, from the lawsuit shows how serious the situation is. SoS Raffensperger also helped draft a loophole in the law to make EAC certification meaningless even though GA law demands compliance with Federal election standards.*



George Eliason at CD media goes on to discuss the illegal updates made in Georgia before the 2020 election and then after much more information and fact, Eliason ends with this:

Stacy Abrams lobbied online to get Dominion's Democracy Suite for this election because she is part of that system with Governor Brian Kemp and SoS Raffenspurger.

Georgia's Constitutional rights and citizen's rights have been violated during every election for the past 18 years every time someone took advantage of this voting system at every level it's used for. Your vote didn't matter. Your election was decided for you. Georgia! I'm offended for you.

Both Republicans and Democrats use these corrupted elections systems to gain power and wealth today at the expense of voters. If you voted for Joe Biden and think it's ok because your candidate won, think again.

Every time a good qualified candidate who is for the American people runs, the election WILL BE STOLEN if this isn't stopped now. Georgia, it's time to say no more!

The 2020 ELECTION WAS STOLEN. If the information above doesn't convince you, it's because you're part of the problem. Donald Trump won the 2020 election.

And there it is...

Submit a Correction



Joe Hoft

Summary

Recent Posts

Contact

Joe Hoft is the twin brother of TGP's founder, Jim Hoft. His posts have been retweeted by President Trump and have made the headlines at the Drudge Report. Joe worked as a corporate executive in Hong Kong and traveled the world for his work, which gives him a unique perspective of US and global current events. He has ten degrees or designations and is the author of three books. His new book: 'In God We Trust: Not in Lying Liberal Lunatics' is out now - please take a look and buy a copy.

 [@joehoft](https://twitter.com/joehoft)

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