

<p>DISTRICT COURT, DENVER COUNTY, COLORADO 1437 Bannock Street Denver, CO 80202</p>	<p>DATE FILED: September 17, 2021 8:12 PM FILING ID: E9E5DD591D201 CASE NUMBER: 2020CV34319</p>
<p>ERIC COOMER, Ph.D., Plaintiff</p> <p>vs.</p> <p>DONALD J. TRUMP FOR PRESIDENT, INC., et al., Defendants</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
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<p style="text-align: center;">EXHIBIT E-16</p>	

The Detroit News

POLITICS

Dominion tells Mellissa Carone to cease 'defamatory claims'

Craig Mauger The Detroit News

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Lansing — Lawyers representing Dominion Voting Systems have asked one of the most vocal critics of Michigan's election to "cease and desist making defamatory claims" and preserve records related to her "smear campaign against the company."

Mellissa Carone, who worked as a contractor for Dominion at Detroit's TCF Center where the city's absentee ballots were counted, is one of more than a dozen individuals who've made unproven claims of wrongdoing about the election technology business and have received letters that warn them that litigation is "imminent."

"Without a shred of corroborating evidence, you have claimed that you witnessed several different versions of voter fraud — ranging from one story involving a van, to other accusations that votes were counted multiple times," the attorneys for Dominion wrote to Carone. "You published these statements even though you knew all along that your attacks on Dominion have no basis in reality."

Attorneys Thomas Clare and Megan Meier, who described themselves as defamation counsel for Dominion, wrote the letter to Carone, which is dated last Tuesday.

In it, they said Carone had positioned herself as "a prominent leader of the ongoing misinformation campaign by pretending to have some sort of 'insider's knowledge.'" However, the attorneys said she was hired through a staffing agency "for one day to clean glass on machines and complete other menial tasks."

Carone's claims about Dominion and TCF Center gained national attention after the Nov. 3 election as supporters of President Donald Trump pushed to discredit President-elect Joe Biden's victory. In a Monday morning interview, she did not cease her claims about Dominion and said some of her information had come directly from individuals working for conservative attorney Sidney Powell, who's filed lawsuits seeking to overturn the results in multiple states.

Carone, 33, confirmed she had received the letter from the attorneys and labeled it "degrading," saying she had been hired to work in information technology at TCF Center, not to clean glass on machines.

"I am not concerned about it," Carone said of the letter.

"They're scared of me," she added.

Biden won Michigan by 154,000 votes, but Trump's backers have made unproven claims of widespread voter fraud and called for Republican lawmakers to intervene and overturn the result. Some of the claims have focused on Dominion Voting Systems, a company whose technology is used to help count votes in 28 states, including Michigan.

Earlier this month, Carone spoke in Lansing at election hearings of the Senate Oversight Committee and the House Oversight Committee. She claimed she saw thousands of instances of ballots being run through tabulators multiple times at the TCF Center — but the absentee counting boards weren't off by thousands of votes.

Almost half or 48% of the 134 counting boards were individually off by plus or minus four votes or fewer each, according to results certified by the county's bipartisan board of canvassers. Another 39 boards, or 29% of them, were in balance, while 31 boards, or 23% of the total, were off by five or more votes.

Carone appeared with Trump's personal attorney Rudy Giuliani at the House Oversight hearing on Dec. 2. She said the turnout was above 120% in Detroit, which it wasn't, and that there was a warehouse in the city where some type of activity related to voter fraud was taking place.

At one point during the House hearing, Rep. Steven Johnson, R-Wayland, pressed Carone about why there weren't major differences between poll book totals, which track voters, and ballot count totals if there were thousands of ballots run multiple times.

"What did you guys do, take it and do something crazy to it?" Carone then asked Johnson, referring to the Detroit poll books.

After the House hearing, "Saturday Night Live" parodied Carone. In the letter from the Dominion attorneys, they said Carone had "gained international infamy."

The attorneys have demanded Carone preserve any documents related to her claims against Dominion, including communications she's had with the Trump campaign and with members of the media.

John Poulos, CEO of Dominion Voting Systems, appeared before the Michigan Senate Oversight Committee on Dec. 15. He told lawmakers the "disinformation campaign being waged against Dominion defies facts or logic."

Dominion serves 63 of the 83 counties in Michigan, according to the company. Those counties include reliably Republican Antrim County, where a string of errors led to Biden being ahead in initial results by 3,200 votes.

Election workers in the county realized there were problems with the tallies and, after they were corrected, Trump ended up winning the county by more than 3,700 votes. But the changing numbers ignited claims of fraud and conspiracy theories about Dominion.

An audit of the official presidential tally in Antrim County later confirmed the results with less than 0.1% of the votes changing.

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