

<p>DISTRICT COURT, DENVER COUNTY, COLORADO 1437 Bannock Street Denver, CO 80202</p>	<p>DATE FILED: September 17, 2021 8:12 PM FILING ID: E9E5DD591D201 CASE NUMBER: 2020CV34319</p>
<p>ERIC COOMER, Ph.D., Plaintiff</p> <p>vs.</p> <p>DONALD J. TRUMP FOR PRESIDENT, INC., et al., Defendants</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>Attorneys for Plaintiff Charles J. Cain, No. 51020 ccain@cstrial.com Steve Skarnulis, No. 21PHV6401 skarnulis@cstrial.com Bradley A. Kloewer, No. 50565 bkloewer@cstrial.com Zachary H. Bowman, No. 21PHV6676 zbowman@cstrial.com CAIN & SKARNULIS PLLC P. O. Box 1064 Salida, Colorado 81201 719-530-3011/512-477-5011 (Fax)</p> <p>Thomas M. Rogers III, No. 28809 trey@rklawpc.com Mark Grueskin, No. 14621 mark@rklawpc.com Andrew E. Ho, No. 40381 andrew@rklawpc.com RechtKornfeld PC 1600 Stout Street, Suite 1400 Denver, Colorado 80202 303-573-1900/303-446-9400 (Fax)</p>	<p>Case Number: 2020cv034319</p> <p>Division Courtroom: 409</p>
<p style="text-align: center;">EXHIBIT M-2</p>	

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

DISTRICT COURT, DENVER COUNTY, COLORADO
1437 Bannock Street
Denver, Colorado 80202
CASE NUMBER 2020CV34319

- - - - - x
ERIC COOMER, Ph.D., :
 :
 Plaintiff, :
 :
 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. :
 - - - - - x

Veritext Virtual Zoom Videotaped
Deposition of SEAN DOLLMAN, taken on Friday, August
13, 2021, held in Arizona, commencing at 12:07 p.m.,
before Jamie I. Moskowitz, a Certified Court
Reporter and Certified Livenote Reporter.

<p>1 APPEARANCES: 2 3 CAIN & SKARNULIS LLP 4 BY: ZACHARY H. BOWMAN, ESQUIRE (Appearing via Zoom) 5 BY: STEVE SKARNULIS, ESQUIRE 6 BY: BRADLEY A. KLOEWER, ESQUIRE 7 400 West 15th Street - Suite 900 8 Austin, Texas 78701 9 512.477.5006 10 zbowman@cstrial.com 11 skarnulis@cstrial.com 12 bkloewer@cstrial.com 13 Counsel for the Plaintiff 14 15 JACKSON KELLY PLLC (Appearing via Zoom) 16 BY: JOHN S. ZAKHEM, ESQUIRE 17 1099 18th Street - Suite 2150 18 Denver, Colorado 80202 19 303.390.0351 20 jszakhem@jacksonkelly.com 21 Counsel for the Defendant Donald J. Trump for 22 President, Inc. 23 24 ARRINGTON LAW FIRM PC (Appearing via Zoom) 25 BY: BARRY ARRINGTON, ESQUIRE 26 3801 East Florida Avenue - Suite 830 27 Denver, Colorado 80210 28 303.205.7870 29 barry@arringtonpc.com 30 Counsel for the Defendants Sidney Powell and Sidney 31 Powell, P.C. 32 33 THE HALL LAW OFFICE, LLC (Appearing via Zoom) 34 BY: ANDREA M. HALL, ESQUIRE 35 P.O. Box 2251 36 Loveland, Colorado 80539 37 970.419.8234 38 andrea@thehalllawoffice.com 39 Counsel for the Defendants Joseph Oltmann, FEC 40 United and Shuffling Madness Media, Inc. dba 41 Conservative Daily 42 43 44 45</p> <p style="text-align: right;">Page 2</p>	<p>1 ALSO PRESENT: 2 ERIC COOMER 3 ALEX CANNON 4 ABBIE FRYE 5 SHANE RAMIREZ 6 Legal Videographer 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 4</p>
<p>1 2 APPEARANCES: 3 (Appearing via Zoom) 4 GORDON REES SCULLY MANSUKHANI, LLP 5 BY: MARGARET L. BOEHMER, ESQUIRE 6 555 Seventeenth Street - Suite 3400 7 Denver, Colorado 80202 8 303.200.6850 9 mboehmer@grsm.com 10 Counsel for the Defendant Eric Metaxas 11 12 LATHROP GPM LLP (Appearing via Zoom) 13 BY: BRADLEY JOHNSON, ESQUIRE 14 2345 GRAND BOULEVARD - Suite 2200 15 KANSAS CITY, MISSOURI 64108 16 816.460.5217 17 brad.johnson@lathroppgm.com 18 Counsel for the Defendants Chanel Rion and Herring 19 Networks, Inc. d/b/a One America News Network 20 21 DYMOND REAGOR, PLLC (Appearing via Zoom) 22 BY: MICHAEL REAGOR, ESQUIRE 23 8400 E. Prentice Avenue - Suite 1040 24 Greenwood Village, Colorado 80111 25 303.734.3400 26 mreagor@drc-law.com 27 Counsel for the Defendant the Republic 28 29 PATTERSON RIPPLINGER, P.C. (Appearing via Zoom) 30 BY: GORDON A. QUEENAN, ESQUIRE 31 5613 DTC Parkway - Suite 400 32 Greenwood Village, Colorado 80111 33 303.741.4539 34 gqueenan@prplegal.com 35 Counsel for the Defendant Michelle Malkin 36 37 LAW OFFICES OF RANDY B. CORPORON, P.C. 38 BY: RANDY B. CORPORON, ESQUIRE (Appearing via Zoom) 39 2821 S. Parker Road - Suite 555 40 Aurora, Colorado 80014 41 303.749.0062 42 rbc@corporonlaw.com 43 Counsel for the Defendant James Hoft 44 45</p> <p style="text-align: right;">Page 3</p>	<p>1 REQUEST PAGE 2 3 INSTRUCTIONS NOT TO ANSWER: 4 Page Line 5 None 6 REQUEST FOR PRODUCTION OF DOCUMENTS: 7 Page Line Description 8 None 9 STIPULATIONS: 10 Page Line 11 None 12 QUESTIONS MARKED: 13 Page Line 14 None 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 5</p>

<p>1 TABLE OF CONTENTS 2 Sean Dollman 3 4 Examination 5 By Mr. Bowman.....Page 7 6 Reporter Certificate.....Page 65 7 Notice to Read and Sign.....Page 63 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 6</p>	<p>1 MR. ZAKHEM: Yes. 2 MR. ARRINGTON: Thank you. 3 MR. REAGOR: Mr. Bowman, I'm sorry, 4 one other procedural item; do you agree that 5 any objection interposed for one party stands 6 for all parties? 7 MR. BOWMAN: Yes, that's fine. And if 8 we had any other agreements on the record at 9 the first deposition, then -- then they can 10 apply to this continuation as well. 11 Anybody else before I jump in? Okay, 12 thanks. 13 EXAMINATION BY MR. BOWMAN: 14 Q Okay. Mr. Dollman, I'm gonna show you 15 Exhibit 68 again. I will show you -- 16 MR. BOWMAN: I'm being told host has 17 disabled screen sharing. Is that something we 18 can fix quickly, or do we need to go off the 19 record? 20 MS. DOMINGUEZ: You are set to -- 21 you're set to share. 22 MR. BOWMAN: Okay. Thank you. 23 BY MR. BOWMAN: 24 Q Okay. So this was the internal 25 campaign emails and memo we were discussing at your</p> <p style="text-align: right;">Page 8</p>
<p>1 * * * 2 SEAN DOLLMAN, after having been first 3 duly sworn, was examined and testified as 4 follows: 5 * * * 6 CONTINUED EXAMINATION BY MR. BOWMAN: 7 Q I don't know if it's morning or 8 afternoon where you are, Mr. Dollman, but it's nice 9 to see you again. Thank you for being available for 10 a continuation. 11 A Sure. 12 Q Let me start off by going back to 13 Exhibit 68, which is the -- 14 MR. ARRINGTON: Counsel, this is 15 Barry Arrington. I hate to interrupt right off 16 the bat, but just as a housekeeping matter real 17 quickly, do we know how much time we have left 18 of your 3 hours? 19 MR. ZAKHEM: An hour and 15 minutes is 20 what I have. 21 MR. BOWMAN: Yeah, an hour and 15. 22 MR. ARRINGTON: So there is an hour 23 and 15 minutes left? And I assume someone is 24 keeping track. Are you keeping track -- track, 25 John?</p> <p style="text-align: right;">Page 7</p>	<p>1 first deposition about the research on 2 Dominion Voting Systems and Eric Coomer. 3 Was this the extent of the research 4 done on Dr. Coomer and Dominion by the campaign? 5 MR. ZAKHEM: Object to form. Object 6 to privilege, work product and attorney/client. 7 To the extent the witness can respond 8 without divulging privileged information, 9 please proceed. 10 THE COURT REPORTER: Who is that, 11 please? 12 MR. ZAKHEM: That's Zakhem. 13 BY MR. BOWMAN: 14 Q Okay. So the question is still on the 15 table. 16 A All right. I mean, all investigations 17 were at the direction of legal counsel for 18 anticipation of litigation, so I believe it's 19 privileged. 20 Q All other research you're talking 21 about, not this specific research? 22 A Correct. I mean, this was a comms 23 team. 24 THE COURT REPORTER: It was a what 25 team?</p> <p style="text-align: right;">Page 9</p>

1 THE WITNESS: Comms, communications.
2 BY MR. BOWMAN:
3 Q So because it was for comms, what
4 ultimately was the purpose of this research?
5 A I don't know.
6 Q You said you know it was for comms,
7 but you don't know what it was for?
8 A Correct. Those are comms personnel
9 within that email chain, so it was for comms. I do
10 not know what it was for.
11 Q Have you spoken with any of the people
12 on these emails, be it Zach Parkinson, Dean Cleary,
13 Matt VanHyfte or Jacki -- and I'm going to butcher
14 that again, Kotkiewicz? Have you spoken with any of
15 them in preparation for your deposition?
16 A No, sir.
17 Q So you're strictly operating under the
18 knowledge that these were comms people that worked
19 for the campaign, so that this was in the comms
20 department; is that right?
21 A Yes, sir.
22 Q So if something was researched within
23 the comms department, ultimately, the purpose would
24 be to affect how the campaign communicated with the
25 public, right?

Page 10

1 A Are you saying that any research done
2 in comms was related to the communications?
3 Q That's what I'm asking, yes.
4 A Sometimes.
5 Q When would it not be related to
6 communications?
7 A If someone was not reading anything
8 from comms or if it didn't get relayed to someone.
9 Q But as a campaign representative,
10 you're testifying that this was for comms purposes?
11 A It was research done by the comms
12 department.
13 Q And who would ultimately make
14 communications to the public based on research done
15 by the comms department?
16 A That would -- it would depend on the
17 situation or the -- the comms director,
18 Tim Murtaugh, or if anything was restricted or
19 reviewed or -- at the direction of legal counsel.
20 Q And who was making communications to
21 the public at this time in -- November 14th, 2020,
22 about the allegations regarding election fraud?
23 MR. ZAKHEM: Objection, form.
24 THE WITNESS: For the campaign, to my
25 knowledge, Tim Murtaugh, and I believe that was

Page 11

1 the comms director on the campaign. And -- not
2 I believe. That was the comms director on the
3 campaign, and I am unsure on the other
4 individuals who would have been -- having this
5 communication.
6 BY MR. BOWMAN:
7 Q Do you recall Tim Murtaugh making
8 specific statements to the public regarding
9 Dominion Voting Systems or Dr. Coomer?
10 A I do not recall.
11 Q So no one was speaking for the
12 campaign about these issues other than
13 Rudy Giuliani; is that correct?
14 MR. ZAKHEM: Object to form.
15 THE WITNESS: For the campaign, no, to
16 my knowledge.
17 BY MR. BOWMAN:
18 Q Do you agree it's a duty of the
19 campaign to be sure anyone speaking on the
20 campaign's behalf is up to date with research that
21 the campaign has done?
22 MR. ZAKHEM: Object to form, legal
23 conclusion.
24 BY MR. BOWMAN:
25 Q You can still answer.

Page 12

1 A So -- repeat that.
2 Q Do you believe that it's a duty of the
3 campaign to be sure anyone speaking on the
4 campaign's behalf is up to date with any research
5 that the campaign has done?
6 MR. ZAKHEM: Same objection.
7 THE WITNESS: So I don't -- I believe
8 that would be up to legal on if we need to
9 correct or display that information.
10 BY MR. BOWMAN:
11 Q Well, you referenced earlier in your
12 deposition that there were policies and procedures
13 regarding communications with the public. Would
14 those policies and procedures address being sure
15 that the communicator is up to speed on internal
16 research?
17 A Within the campaign? Yes.
18 But like I had told you before, at the
19 time when Mr. Giuliani and his team came in, there
20 was not a structured policy or procedure on
21 authorization within the campaign. Individuals
22 within the campaign still tried to adhere to some
23 type of structure or policy.
24 Q So the policies and procedures that
25 you referenced were -- were disregarded as far as

Page 13

1 Mr. Giuliani's representations to the public?
 2 MR. ZAKHEM: Object to form.
 3 BY MR. BOWMAN:
 4 Q Is that right?
 5 A I wouldn't say disregarded, but
 6 they -- Mr. Giuliani did -- had his own approval
 7 setup, I guess, on his own. It wasn't part of the
 8 campaign.
 9 Q What was that approval setup that
 10 wasn't part of the campaign?
 11 MR. ZAKHEM: Object to form,
 12 foundation.
 13 THE WITNESS: I don't know. I think
 14 you would have to miss -- ask Mr. Giuliani on
 15 that one.
 16 BY MR. BOWMAN:
 17 Q So as the campaign representative,
 18 you're unaware of what type of approval process --
 19 A Sorry about that. My doorbell is
 20 going off.
 21 THE COURT REPORTER: I'm sorry. Can
 22 you repeat that?
 23 THE WITNESS: Myself or Mr. Bowman?
 24 THE COURT REPORTER: Yourself.
 25 THE WITNESS: I said I'm sorry. My

Page 14

1 doorbell is going off.
 2 BY MR. BOWMAN:
 3 Q Okay.
 4 A This work from home stuff, something
 5 else.
 6 Q I know. Tell me about it. All right.
 7 MR. BOWMAN: Can the court reporter
 8 read back my last question?
 9 (Whereupon, the testimony was read
 10 back as requested.)
 11 BY MR. BOWMAN:
 12 Q So as -- as the campaign
 13 representative, you're testifying that you're
 14 unaware of what approval process any communications
 15 went through that ultimately were published through
 16 Rudy Giuliani; is that correct?
 17 MR. ZAKHEM: Object to form.
 18 THE WITNESS: For Rudy Giuliani and
 19 his team I -- I do not know the structure of
 20 approval. Like I said before, the campaign was
 21 shutting down. There was -- there was a lot of
 22 things happening where the campaign was no
 23 longer the entity moving forward or the same
 24 structured entity moving forward.
 25

Page 15

1 BY MR. BOWMAN:
 2 Q So did the campaign let Giuliani take
 3 over communications to the public with regards to
 4 allegations of election fraud?
 5 MR. ZAKHEM: Object to form.
 6 THE WITNESS: I believe there was
 7 still a -- I believe there was still a
 8 communications team for the campaign
 9 individually -- I mean, as an entity. But I do
 10 not know what Mr. Giuliani was doing.
 11 BY MR. BOWMAN:
 12 Q And you don't know whether that
 13 communications team was ever making communications
 14 to the public about Dominion Voting Systems or
 15 Eric Coomer, correct?
 16 A No, not to my knowledge.
 17 Q Who brought in Rudy Giuliani?
 18 A I do not know.
 19 Q So as the campaign representative,
 20 you're unaware of why Rudy Giuliani set up shop in
 21 campaign headquarters and who authorized him to do
 22 that?
 23 A Correct. I just know he came in and
 24 had his team and took over a conference room, and
 25 that was pretty much it.

Page 16

1 Q Who would know who authorized that?
 2 A I don't know.
 3 Q And when you talked before about the
 4 topics in your deposition notice, one of which,
 5 Topic 4, was "Rudy Giuliani's role, if any, as your
 6 representative of or agent, including any
 7 authorization of Rudy Giuliani to make statements on
 8 your behalf." And then it continues.
 9 So your testimony today is you're --
 10 you're not aware of information responsive to that
 11 topic; is that correct?
 12 A That's correct.
 13 MR. ZAKHEM: Object to form.
 14 BY MR. BOWMAN:
 15 Q Who would usually give authorization
 16 to somebody like Giuliani to speak to the public?
 17 A Campaign leadership.
 18 Q Which would be who?
 19 A The campaign manager. I mean, it
 20 would be, at the time, Bill Stepien.
 21 Q And you're not aware of the campaign
 22 ever telling him not to make representations to the
 23 public regarding these issues, correct?
 24 MR. ZAKHEM: Object to form. Who are
 25 you talking about?

Page 17

1 BY MR. BOWMAN:
2 Q Rudy Giuliani.
3 You're not aware of anyone at the
4 campaign telling Rudy Giuliani to stop making
5 representations to the public regarding accusations
6 of election fraud; is that right?
7 THE WITNESS: Is that -- is that
8 privileged information?
9 MR. ZAKHEM: Well, you're not going to
10 say anything that you believe to be privileged.
11 THE WITNESS: Then I believe that to
12 be privileged.
13 BY MR. BOWMAN:
14 Q You believe that to be privileged
15 because that information would have come from
16 counsel for the Trump Campaign?
17 A Correct.
18 Q Who was part of the Giuliani team that
19 you mentioned that set up shop in the campaign
20 headquarters?
21 A Mr. Giuliani and -- not -- I'll be
22 honest with you, Mr. Bowman, I'm not familiar with a
23 lot of the individuals but -- and, again, there was
24 no direct, like, communication with me and
25 Mr. Giuliani.

Page 18

1 But from what I saw, it was
2 Mr. Giuliani. I think it was his son
3 Andrew Giuliani and some other people from
4 Giuliani Partners, I believe.
5 Q Was Sidney Powell part of that team?
6 A Not to my knowledge.
7 Q But you're not aware of whether she
8 was or not?
9 MR. ZAKHEM: Object to form.
10 You can answer the question.
11 BY MR. BOWMAN:
12 Q Well, you just -- how -- how big was
13 the team? I guess that's what I'm trying to
14 understand. All you can testify to that it was
15 Rudy Giuliani, his son and some other members of his
16 firm. But you don't know really who any other
17 people were that were in that team; is that right?
18 A That's correct, sir.
19 Q Before we get off this internal memo,
20 there's a statement here from Zach Parkinson where
21 he's directing the research team to look into this.
22 And he says, "Obviously, this is some conspiratorial
23 stuff, but we need to be thorough and track it
24 down."
25 What's your understanding of the

Page 19

1 campaign's view of this material being
2 "conspiratorial stuff"?
3 MR. ZAKHEM: Object to form.
4 THE WITNESS: I mean, what is he
5 referring to, everything in the email, or is it
6 just --
7 BY MR. BOWMAN:
8 Q Well, he lists the topics here that he
9 wants everyone to look into. And we looked at this
10 exhibit earlier this week, and I think you were
11 instructed to go ahead and go through it and make
12 sure you were familiar, especially by today.
13 So these are the topics he's listed on
14 Page 2 that he wanted the research team to look
15 into, and he's referring to it as "some
16 conspiratorial stuff." So what is your
17 understanding of what that phrase means?
18 A I believe that is Mr. Parkinson's
19 opinion about the stuff they're looking into.
20 Q What does "conspiratorial" mean?
21 MR. ZAKHEM: Object to foundation.
22 THE WITNESS: I mean, it could just be
23 rumors.
24 BY MR. BOWMAN:
25 Q And there's another --

Page 20

1 A It's just something to look into.
2 THE COURT REPORTER: I'm sorry?
3 THE WITNESS: It's something to look
4 into.
5 BY MR. BOWMAN:
6 Q There's another statement here, "Want
7 the same format and type of product as last night."
8 Do you have any knowledge as to what
9 he's referring to there?
10 A No, sir.
11 MR. BOWMAN: All right. Let me go to
12 Exhibit 3.
13 THE COURT REPORTER: What exhibit was
14 that that we just had?
15 MR. BOWMAN: That was 68.
16 BY MR. BOWMAN:
17 Q I'm pulling up an earlier marked
18 exhibit, Plaintiffs' Exhibit 3. I'm scrolling down
19 to Page 49.
20 So this is the November 19th press
21 conference we discussed on Monday. We went through
22 a couple of statements that were made in here, but
23 we had to cut off. This is a statement by
24 Rudy Giuliani at that press conference, and I'll
25 read it where he says, "And by the way, the Coomer

Page 21

1 character, who is close to Antifa, took off all his
2 social media. Ah-ha, but we kept it. We've got it.
3 The man is a vicious, vicious man. He wrote
4 horrible things about the president. He is
5 completely" -- "he is completely biased. He's
6 completely warped, and he specifically says that
7 they're going to fix this election. I don't know
8 what you need to wake up to do your job and inform
9 the American people, whether you like it or not, of
10 the things they need to know. This is real. It is
11 not made up. It is not -- there's nobody here that
12 engages in fantasies. I've tried 100 cases. I have
13 prosecuted some of the most dangerous criminals in
14 the world. I know crimes. I can smell 'em. You
15 don't have to smell this one. I can prove it to you
16 18 different ways."
17 So that statement by Rudy Giuliani on
18 November 19th, does that have any basis in the memo
19 that we looked at as Exhibit 68?
20 MR. ZAKHEM: Object to form,
21 foundation.
22 And to the extent it requires
23 disclosure of privileged information, I'm
24 instructing the witness not to answer in that
25 matter.

Page 22

1 THE WITNESS: How do I answer if
2 you're instructing me not answer on that one,
3 Mr. Zakhem?
4 BY MR. BOWMAN:
5 Q Well, I'm -- I'm asking purely whether
6 this -- I guess --
7 A The statement on whether he's a
8 vicious, vicious man?
9 Q Does this at all comport with what we
10 just looked at, Exhibit 68? Is it at all based on
11 information within that document?
12 MR. ZAKHEM: Object to form.
13 THE WITNESS: I don't know. I don't
14 know what Mr. Giuliani -- where he got his
15 information.
16 BY MR. BOWMAN:
17 Q Is this information that the campaign
18 agreed with at the time?
19 MR. ZAKHEM: Object to form. What --
20 what information are you talking about?
21 MR. BOWMAN: This paragraph I just
22 read, did the campaign have this information
23 and believe it was true?
24 MR. ZAKHEM: Object to form and
25 instruct the witness not to answer to the

Page 23

1 extent it would reveal any privileged
2 information.
3 THE WITNESS: Mr. Bowman, I apologize.
4 Like, you're asking if the campaign believes
5 that this statement is true; is that the
6 question?
7 BY MR. BOWMAN:
8 Q Yes, at the time that this was issued.
9 A I don't know. I think there's a lot
10 of things within this statement, and I do not know
11 about the timing.
12 Q Well, part of what he's doing, he's
13 accusing Dr. Eric Coomer of a crime. Would you
14 agree with that?
15 In fact, rather than you reading the
16 whole thing again, let me just ask, did the campaign
17 have any information available to it at the time
18 that led it to believe Eric Coomer had committed any
19 crime?
20 MR. ZAKHEM: Object to form,
21 foundation, and instruct the witness not to
22 answer to the extent it would reveal privileged
23 information.
24 THE WITNESS: I don't know at this
25 time.

Page 24

1 BY MR. BOWMAN:
2 Q Did the campaign see it as reasonable
3 that someone would identify themselves on a
4 conference call with multiple other parties as
5 someone who was rigging an election?
6 MR. ZAKHEM: Object to form,
7 foundation.
8 THE WITNESS: I don't -- I don't know.
9 BY MR. BOWMAN:
10 Q Were any lawsuits ever filed by the
11 Trump Campaign that actually alleged that
12 Dr. Eric Coomer had played a role in rigging the
13 election?
14 A Not to my knowledge.
15 Q And did the campaign ever file any
16 lawsuits alleging that Dominion Voting Systems had
17 played a role in rigging the election?
18 A Not to my knowledge.
19 Q So going back to my earlier question,
20 did the campaign agree with the representations that
21 Rudy Giuliani was making to the public on this
22 issue?
23 MR. ZAKHEM: Object to form,
24 foundation, and instruct the witness not to
25 answer if it would reveal any privileged

Page 25

1 communication or work product.
 2 THE WITNESS: I don't have that
 3 information, Mr. Bowman.
 4 BY MR. BOWMAN:
 5 Q Were there any discussions you're
 6 aware of between comms or people that weren't legal
 7 counsel about these kind of representations?
 8 MR. ZAKHEM: Which representations are
 9 you talking about?
 10 MR. BOWMAN: The ones we're looking at
 11 in this highlighted paragraph and the next
 12 paragraph, that Eric Coomer has committed some
 13 crime and rigged the election?
 14 MR. ZAKHEM: Referring to Exhibit 68
 15 or, excuse me, Exhibit 3, correct?
 16 MR. BOWMAN: Exhibit 3, yes.
 17 BY MR. BOWMAN:
 18 Q Were there any internal discussions of
 19 the campaign not involving legal counsel about these
 20 statements by Rudy Giuliani?
 21 A Not to my knowledge.
 22 Q And you're not aware of any
 23 communication after this with Rudy Giuliani about
 24 whether to continue making statements like this?
 25 MR. ZAKHEM: Object to -- on the

Page 26

1 grounds of privilege. Any communication made
 2 by Mr. -- between the campaign and Mr. Giuliani
 3 after this date is privileged.
 4 MR. BOWMAN: Are you taking a stance
 5 that it's after this date, or are you saying
 6 anything earlier than this?
 7 MR. ZAKHEM: I'm saying -- my
 8 objection stands as it is. I'm instructing the
 9 witness not to respond to that question on the
 10 grounds of privilege.
 11 BY MR. BOWMAN:
 12 Q Did the campaign coordinate at all
 13 with OAN on researching these issues?
 14 MR. ZAKHEM: Issues referenced in
 15 Exhibit 3?
 16 MR. BOWMAN: Yes.
 17 MR. ZAKHEM: In these two paragraphs?
 18 THE WITNESS: Not to my knowledge.
 19 BY MR. BOWMAN:
 20 Q Are you aware of OAN ever coordinating
 21 with the campaign on anything?
 22 A Not to my knowledge, no, sir.
 23 Q Do you know if OAN was a news source
 24 that the campaign relied upon?
 25 A Not to my knowledge.

Page 27

1 Q Do you know if Newsmax was a source of
 2 news that the campaign relied upon?
 3 A Not to my knowledge, again.
 4 Q Would you agree that Rudy Giuliani's
 5 statements alleging that Eric Coomer is a criminal
 6 who helped commit election fraud were reckless?
 7 MR. ZAKHEM: Object to form,
 8 foundation and calls for a legal conclusion.
 9 THE WITNESS: Sir, I'm not -- I'm not
 10 a lawyer. I couldn't come up with a legal
 11 conclusion on this one.
 12 BY MR. BOWMAN:
 13 Q You're not aware of any information
 14 the campaign had that supported the truth of these
 15 statements regarding Eric Coomer being a criminal?
 16 MR. ZAKHEM: Instruct the witness not
 17 to answer if it would reveal any privileged
 18 information.
 19 THE WITNESS: I believe it's
 20 privileged.
 21 BY MR. BOWMAN:
 22 Q I'm going to pull up Plaintiffs'
 23 Exhibit 7. This was introduced before, but we
 24 haven't looked at it. This is a Politico article
 25 about -- titled, "Trump Campaign Cuts Sidney Powell

Page 28

1 from President's Legal Team." This is on
 2 November 22nd of 2020, just a few days later.
 3 And this statement here I wanted to
 4 direct you to states, "Sidney Powell is practicing
 5 law on her own, Trump's personal lawyer
 6 Rudy Giuliani and campaign lawyer Jenna Ellis said
 7 in the statement. She is not a member of the Trump
 8 legal team. She is also not a lawyer for the
 9 president in her personal capacity."
 10 Are you aware of why there was a need
 11 to issue this kind of statement on
 12 November 22nd of 2020?
 13 A I don't know.
 14 Q Are you aware of what Powell's
 15 communications with the Trump Campaign were at this
 16 time?
 17 MR. ZAKHEM: Object to form.
 18 THE WITNESS: Is that privileged
 19 information?
 20 BY MR. BOWMAN:
 21 Q He just objected to form. He hasn't
 22 instructed you not to answer.
 23 A What was the question again? Am I
 24 aware --
 25 Q Of Sidney Powell's communications with

Page 29

1 the campaign at this time?
2 A No, sir.
3 Q You don't know whether she was still
4 communicating with the campaign at all?
5 MR. ZAKHEM: Object to form.
6 THE WITNESS: No, sir.
7 BY MR. BOWMAN:
8 Q Was there a concern by the campaign
9 that Ms. Powell was going too far in her statements
10 to the public?
11 A I don't know, sir.
12 Q Are you aware of whether Ms. Powell
13 was ever given authority to speak on behalf of the
14 campaign prior to November 22nd?
15 MR. ZAKHEM: Object to form.
16 THE WITNESS: No, sir.
17 BY MR. BOWMAN:
18 Q So, again, on your deposition
19 topics, Topic 5 was Sidney Powell's role, if any, as
20 a representative and agent, including any
21 authorization of Sidney Powell to make statements on
22 your behalf.
23 And you are unaware of information
24 responsive to that topic; is that correct?
25 A I'm unaware of Mrs. Powell being a

Page 30

1 lawyer for the campaign.
2 Q But you're also unaware of any
3 communications --
4 MR. ARRINGTON: Excuse me. Could the
5 witness repeat his last answer? Or more
6 appropriately, could the court reporter read
7 the last answer back. I didn't catch it.
8 (Whereupon, the testimony was read
9 back as requested.)
10 MR. ARRINGTON: Okay. That's what
11 I -- I could not tell whether he said "aware"
12 or "unaware". But the record is "unaware."
13 Thank you.
14 BY MR. BOWMAN:
15 Q But you're also unaware of any
16 communications regarding any authority of
17 Ms. Powell; is that right?
18 A Ms. Powell was not a lawyer for the
19 campaign, and it's all -- you would have to ask
20 Ms. Powell for that information.
21 Q Well, what are you basing the
22 statement that she was not a lawyer for the campaign
23 on?
24 A That she was not a lawyer for the
25 campaign. We had no engagement letter or anything

Page 31

1 with Mrs. Powell.
2 Q So you're basing it on the lack of an
3 engagement letter?
4 A And the fact she said it in her
5 statement.
6 Q But you're unaware of any
7 communications with Ms. Powell regarding
8 coordinating research, discussing what lawsuits were
9 to be filed, anything like that, correct?
10 A Correct. I am unaware of
11 Mrs. Powell's coordination or any communications. I
12 think that's all stuff that you would have to ask
13 Mrs. Powell.
14 Q There's a statement here by -- about
15 Mike DuHaime, the Republican National Committee's
16 former political director, tweeting on Sunday that
17 "The party must pull down its tweet endorsing
18 Powell's remarks now that she's been removed from
19 representing Trump or the campaign. 'This is
20 crazy/embarrassing to promote,' he retweeted."
21 Were there any discussions amongst the
22 campaign about pulling down any publications or
23 statements or issuing any corrections at this time?
24 MR. ZAKHEM: Object to form and
25 instruct the witness not to answer to the

Page 32

1 extent it would reveal any privileged
2 information.
3 THE WITNESS: Not to my knowledge.
4 BY MR. BOWMAN:
5 Q So Sidney Powell's client,
6 Michael Flynn, received a presidential pardon on
7 November 26th, the day after Sidney Powell filed
8 lawsuits challenging the election results in
9 Michigan and Georgia, and days before she filed
10 lawsuits in Arizona and Wisconsin. Was the pardon
11 of Michael Flynn related at all to her filing of
12 these lawsuits?
13 MR. ZAKHEM: Object to form,
14 foundation, and this is beyond topic in the
15 deposition notice, and I'm instructing the
16 witness not to respond. Move on.
17 MR. BOWMAN: What's the basis for
18 instructing him not to respond?
19 MR. ZAKHEM: It's not part of any --
20 of the notice.
21 MR. BOWMAN: No. But if it's within
22 his knowledge, he can answer it.
23 MR. ZAKHEM: Well, it's not within his
24 knowledge, and it's -- it's not part -- the
25 pardon didn't come from the campaign. It has

Page 33

1 nothing to do with the campaign. Move on.
 2 BY MR. BOWMAN:
 3 Q Are you unaware of the answer to that,
 4 Mr. Dollman?
 5 MR. ZAKHEM: He's not answering it.
 6 Move on, Zach.
 7 MR. BOWMAN: Well, simply because it's
 8 not listed as a topic isn't a basis to instruct
 9 him not to answer. If he knows --
 10 MR. ZAKHEM: It is. We're -- we're
 11 not going to -- we're not going to have this
 12 debate. He's not answering that question.
 13 Find another one.
 14 MR. BOWMAN: Okay. He's been
 15 instructed not to answer.
 16 BY MR. BOWMAN:
 17 Q Let's look at -- I'm going to show
 18 you -- Exhibit 70 is a tweet from Donald Trump where
 19 he quotes, "Dominionizing the vote," and he includes
 20 a link to an OAN report by Chanel Rion in multiple
 21 parts.
 22 And I'm going to also show you
 23 Exhibit 71 which didn't have a date on it, so that's
 24 why I broke this up. But I'm simply showing you
 25 that he's retweeted each of these parts, part one,

Page 34

1 part two, part three.
 2 Was it the position of the campaign at
 3 this time on November 21st of 2020 that Dominion had
 4 played a role in rigging the election?
 5 MR. ZAKHEM: Object to form.
 6 THE WITNESS: Are you saying based on
 7 the president's Twitter?
 8 BY MR. BOWMAN:
 9 Q So I'm -- right. I'm showing you what
 10 the president was tweeting at the time, was the
 11 campaign also advancing this theory that Dominion
 12 had rigged the election.
 13 MR. ZAKHEM: Object to form.
 14 THE WITNESS: This was his -- this was
 15 his official Twitter account and not the
 16 campaign's Twitter account; is that correct?
 17 Is that what you're saying? Like, is the
 18 campaign believing the official account? Are
 19 you saying the official account represents the
 20 campaign?
 21 BY MR. BOWMAN:
 22 Q I'm just asking you if the campaign
 23 was also promoting this same type of statement at
 24 the time.
 25 A Not to my knowledge.

Page 35

1 Q What was the coordination between
 2 Donald Trump and the campaign in this time frame in
 3 terms of publishing statements to the public
 4 regarding alleged election fraud?
 5 MR. REAGOR: Object to form.
 6 THE WITNESS: Mr. Bowman, can you
 7 scroll down so I can see the date on it?
 8 BY MR. BOWMAN:
 9 Q Oh, November 21st.
 10 A November 21st? And the question was
 11 what was the coordination between --
 12 Q Right. So you have -- you have
 13 Rudy Giuliani advancing election fraud theories.
 14 You have Donald Trump advancing election fraud
 15 theories. But your position is that none of these
 16 are statements by the campaign.
 17 So I'm asking you, what was the
 18 communication between Donald Trump and the campaign
 19 on these issues?
 20 A The campaign was, at the direction of
 21 legal counsel, to do -- to investigate these matters
 22 in anticipation of litigation, so we're at the
 23 direction of legal counsel for this.
 24 Q So you're saying there was no
 25 coordination between Donald Trump and the campaign

Page 36

1 on publishing statements about Dominion Voting?
 2 A I don't know that answer.
 3 Q I'm not pulling it up as an exhibit.
 4 But there's a statement in the Trump Campaign's
 5 Motion to Dismiss that says, "The Trump Campaign and
 6 its alleged agents have every reason to rely on the
 7 accuracy of Defendant Oltmann's reports regarding
 8 plaintiff."
 9 Can you tell me why the campaign had
 10 every reason to rely on the accuracy of
 11 Joseph Oltmann's reports regarding Dr. Coomer?
 12 MR. ZAKHEM: Instruct the witness not
 13 to answer to the extent it would reveal
 14 privileged communications and work product.
 15 MR. BOWMAN: So I just want to be
 16 clear. I'm -- I'm citing a statement in your
 17 Motion to Dismiss. I'm asking for support for
 18 it, and you're telling me that that is
 19 privileged; is that correct?
 20 MR. ZAKHEM: If he can't respond
 21 without privileged information, then I'm
 22 instructing him not to answer.
 23 THE WITNESS: I don't have anything
 24 that's not privileged.
 25

Page 37

1 BY MR. BOWMAN:
2 Q Okay. What was the -- was there any
3 communication directly between the Trump Campaign
4 and Joseph Oltmann?
5 A Not to my knowledge.
6 Q At the time that the campaign -- or
7 let me back up. At the time that Donald Trump,
8 Eric Trump, Rudy Giuliani and Sidney Powell were
9 advancing theories of election fraud deriving from
10 Joseph Oltmann's statements, was the campaign aware
11 that Oltmann was a conservative podcast host?
12 MR. ZAKHEM: Object to form.
13 THE WITNESS: What time frame was
14 this?
15 BY MR. BOWMAN:
16 Q November of 2020.
17 A I don't know.
18 Q Was the campaign aware that Oltmann
19 had an ownership interest and a financial interest
20 in his podcast?
21 MS. HALL: Object to form,
22 Andrea Hall.
23 THE WITNESS: Are you asking if he had
24 a for-profit business?
25

Page 38

1 BY MR. BOWMAN:
2 Q I'm asking if the campaign was aware
3 of that in November of 2020?
4 A I don't know.
5 Q Was the campaign aware that he was a
6 Trump supporter who had held rallies in support of
7 former President Trump?
8 A I don't know.
9 Q Was the campaign aware that he had
10 made unsubstantiated allegations of election fraud
11 even before the election?
12 MR. ZAKHEM: You broke up on that.
13 Can you say it again?
14 BY MR. BOWMAN:
15 Q Yes. Was the campaign aware that
16 Joseph Oltmann had made unsubstantiated allegations
17 of election fraud even leading up to the election?
18 MR. ZAKHEM: Object to form.
19 THE WITNESS: Not to my knowledge.
20 BY MR. BOWMAN:
21 Q And you're aware that the original
22 statements asserting that Dr. Coomer was part of an
23 Antifa conference call and rigged the election
24 originated with Joseph Oltmann, correct?
25 A Correct.

Page 39

1 Q Are you aware that Joseph Oltmann was
2 scheduled and ordered to appear for his deposition
3 in Colorado this week to testify on the basis of
4 those statements and support for those statements
5 and that he refused to appear?
6 MS. HALL: Object to form.
7 THE WITNESS: I am -- I am aware now,
8 sir.
9 BY MR. BOWMAN:
10 Q Does that at all change your opinion
11 regarding whether the research the Trump Campaign
12 did into the Eric Coomer allegations was true or
13 not?
14 MS. HALL: Object to form.
15 THE WITNESS: I believe all research
16 was at the direction of legal counsel.
17 BY MR. BOWMAN:
18 Q We have been looking at research that
19 you produced that you said was for comms, correct?
20 A That comms had an internal memo.
21 Q Right.
22 A But it wasn't produced.
23 Q And this internal memo said -- I'm
24 saying "produced" because it was produced to us in
25 the lawsuit, so I'm sorry if it's --

Page 40

1 A Oh, okay.
2 Q The internal memo, again, looking at
3 it states, "There's no evidence that Dominion's CEO
4 or any other leader of the group has ties to Antifa,
5 and there's no evidence Coomer is a member or has
6 any ties to Antifa."
7 And I recall that during your first
8 deposition, or first part, you stated you had doubts
9 as to the truth of this statement. Now that
10 Mr. Oltmann has refused to appear for his
11 deposition, has that changed your opinion regarding
12 whether these statements are true or not?
13 MS. HALL: Object to form.
14 THE WITNESS: I think -- not -- I
15 think all -- all litigation, like I said
16 before, was at the direction of legal counsel,
17 and I -- this was done by comms without the
18 direction of legal counsel.
19 So anything at the direction of legal
20 counsel was anticipated, and I believe that's
21 privileged information after that.
22 BY MR. BOWMAN:
23 Q Let me back up. I'm only asking you
24 about this memo, comms, that has been produced, and
25 there's been no assertion that this memo is

Page 41

1 privileged. And this memo concludes that Dr. Coomer
 2 has nothing to do with Antifa, that there's no
 3 evidence supporting that he's a member or has any
 4 ties to Antifa.
 5 You stated at your prior deposition
 6 that you had reasons to doubt that, but you wouldn't
 7 share exactly why. Has the fact that Mr. Oltmann
 8 has now refused to appear for his deposition changed
 9 your opinion on the truth of these statements?
 10 MR. ZAKHEM: Object to form.
 11 THE WITNESS: My opinion hasn't
 12 changed, sir.
 13 BY MR. BOWMAN:
 14 Q Wouldn't the fact that he's failed to
 15 appear and support his statements corroborate the
 16 statements here that there's no evidence Coomer is a
 17 member or has any ties to Antifa?
 18 MR. ZAKHEM: Object to form.
 19 THE WITNESS: I don't know why
 20 Mr. Oltmann would not show up or why he would
 21 not be there. That's something you would have
 22 to ask Mr. Oltmann.
 23 BY MR. BOWMAN:
 24 Q And, again, with regards to why the
 25 campaign had any reason to rely on the accuracy of

Page 42

1 Oltmann's statements, you are claiming privilege as
 2 to that entire answer; is that correct?
 3 THE COURT REPORTER: You are or
 4 aren't?
 5 MR. BOWMAN: I'm asking if they are.
 6 And maybe that's a question for John.
 7 MR. ZAKHEM: Yeah. I'm instructing
 8 the witness not to respond with any privileged
 9 information to any question. So he can answer
 10 if he's got non-privileged information that's
 11 responsive to your question.
 12 THE WITNESS: Yeah. I think, like I
 13 said before in the last deposition, I wasn't
 14 basing it off of Mr. Oltmann's statements or
 15 anything alone. I mean, there is -- like I
 16 said before, there's a whole list of different
 17 social media posts by Mr. Coomer -- Coomer.
 18 And there's a lot of different things that he
 19 has said or reposts or anything else that --
 20 that's where I would say that this
 21 information -- I mean, that's why I don't agree
 22 with this one at the time.
 23 MR. BOWMAN: Yeah. And objection,
 24 nonresponsive.
 25

Page 43

1 BY MR. BOWMAN:
 2 Q My question was, in your Motion to
 3 Dismiss, the Trump Campaign's Motion to Dismiss, you
 4 state that you had every reason to rely on the
 5 accuracy of Joseph Oltmann's reports regarding
 6 Plaintiff.
 7 But today as you sit here as a
 8 representative of the campaign, you cannot testify
 9 as to any reason you're relying on the accuracy
 10 because that would intrude upon privilege; is that
 11 your position?
 12 A Yes.
 13 MR. REAGOR: Michael Reagor, object to
 14 form.
 15 MR. ZAKHEM: Yes. That's our
 16 position.
 17 BY MR. BOWMAN:
 18 Q So with regards to Topic 10 of the
 19 deposition notice, any knowledge or connection with
 20 Joseph Oltmann obtained prior to or following your
 21 publication, authorization or ratification of
 22 statements, you have no responsive information to
 23 that?
 24 MR. ZAKHEM: No, that's not correct.
 25 He's -- he's responded to a number of questions

Page 44

1 from you in the prior session on that topic in
 2 which he did provide information about the
 3 knowledge of the campaign, about Mr. Oltmann,
 4 about the publications, authorizations, or
 5 ratifications of statements made by others,
 6 none of which were made by the campaign, and
 7 all -- none of which were ratified by the
 8 campaign about Dr. Coomer and Dominion Voting.
 9 He's given you a litany of responses
 10 on that topic. You just don't like them.
 11 MR. BOWMAN: Today, his answer as to
 12 any knowledge of communications with Oltmann --
 13 BY MR. BOWMAN:
 14 Q The answer is you have no knowledge,
 15 correct?
 16 A Any communication with Mr. Oltmann?
 17 Q Yes.
 18 A From the campaign directly?
 19 Q Right.
 20 A Not to my knowledge.
 21 Q And regarding the question of why you
 22 would trust Mr. Oltmann's statements, the answer was
 23 that's privileged attorney/client, correct?
 24 A I answered as to why we would trust
 25 Mr. Oltmann's statements?

Page 45

1 Q Yes.
2 MR. ZAKHEM: It's been asked and
3 answered repeatedly.
4 MR. BOWMAN: That's fine. I'll move
5 on.
6 BY MR. BOWMAN:
7 Q Did any communications sent by the
8 campaign for the purpose of fundraising mention the
9 allegations against Dominion Voting or Dr. Coomer?
10 A I don't know.
11 Q Were you involved at all in those
12 fundraising emails, letters, whatever they are?
13 A No, I was not.
14 Q Who would have been in charge of --
15 I'm sorry. Who would have been in charge of those
16 type of communications?
17 A The fundraising team, depending on who
18 it was with the -- what type of fundraising. So our
19 vendors.
20 Q Are you aware of whether any of that
21 fundraising after November 3rd referred to
22 challenging the election results?
23 MR. REAGOR: Michael Reagor, object to
24 form.
25 THE WITNESS: Our fundraising efforts

Page 46

1 were based off of current events, so I would
2 think, like, during that time frame in
3 November, I'm sure there was some fundraising
4 efforts that involved challenging election
5 results.
6 BY MR. BOWMAN:
7 Q Are you aware of any coordination
8 between the campaign and James Hoft in
9 November/December of 2020?
10 A I am not.
11 Q Are you aware of any communications
12 with Michelle Malkin regarding the Dominion or
13 Eric Coomer allegations?
14 A No, sir.
15 Q Are you aware of any communication
16 with Chanel Rion regarding communications? I'm
17 sorry, regarding the Eric Coomer or Dominion
18 allegations?
19 A No, sir.
20 Q Are you aware of the Trump Campaign
21 coordinating with OAN regarding Dominion or
22 Dr. Coomer?
23 A No, sir.
24 Q Who would have that type of
25 coordination, if it happened, go through most

Page 47

1 likely?
2 A Are you asking about communication
3 they had with other individuals, outside
4 individuals?
5 Q Right. Communication with news
6 sources or any sort of conservative pundits about
7 theories of election fraud during November and
8 December of 2020?
9 A I don't --
10 MR. REAGOR: Object to form, Michael
11 Reagor.
12 BY MR. BOWMAN:
13 Q I'm sorry. What's the answer?
14 A I don't know.
15 Q You don't know who would handle that
16 communication?
17 A No, sir.
18 Q Are you aware of whether the campaign
19 ever coordinated with news sources or conservative
20 pundits about statements it wanted to make to the
21 public?
22 MR. ZAKHEM: Object.
23 MR. REAGOR: Object to form, Michael
24 Reagor.
25 THE WITNESS: I mean, we -- we had

Page 48

1 interviews with different news stations and
2 networks and -- I mean, there were multiple
3 different things during the election that, you
4 know, they went on TV and discussed. So --
5 BY MR. BOWMAN:
6 Q Right. And I guess my question is,
7 was the campaign ever being sent information about
8 the Coomer or Dominion Voting allegations by any
9 news sources or conservative pundits?
10 MR. REAGOR: Object to form,
11 Michael Reagor.
12 THE WITNESS: Not to my knowledge.
13 BY MR. BOWMAN:
14 Q Have you communicated with people from
15 comms or research who would have been the parties
16 actually handling that kind of communication as part
17 of your prep for today?
18 A No, sir.
19 Q So your response to that question is
20 based on your own personal experience as the CFO; is
21 that correct?
22 MR. ZAKHEM: Object to form. Instruct
23 the witness not to divulge any information that
24 is privileged or work product in responding to
25 that.

Page 49

1 THE WITNESS: I think any
2 communication the campaign would have been
3 aware of would have been within emails, and
4 that would have been subject to your document
5 protector or production, right?
6 BY MR. BOWMAN:
7 Q Let me just go through a list of
8 names, and I think I'll probably know the answer to
9 these. But are you aware of the campaign ever
10 coordinating with Sidney Powell, Joseph Oltmann,
11 Ron Watkins, Ali Alexander, Patrick Byrne,
12 Christina Bobb or Mike Lindell during November and
13 December of 2020 about any allegations regarding
14 election fraud?
15 MR. ZAKHEM: Object to form.
16 THE WITNESS: Not to my knowledge,
17 sir. I think that would be something you'd
18 have to ask Mr. Giuliani.
19 BY MR. BOWMAN:
20 Q Do you recall whether Jenna Ellis was
21 a member of that Giuliani legal team that relocated
22 into campaign head quarters?
23 A Jenna Ellis, to my knowledge, no, it
24 was -- no one ever went to Jenna Ellis for
25 information. No one ever asked Jenna Ellis for

Page 50

1 legal advice, and I don't believe -- I think she
2 was, by title, a campaign lawyer. But if she was a
3 part of Mr. Giuliani's team, I am unaware of her
4 status within his team.
5 Q What was the role of the campaign in
6 any organization of what was called the
7 Jericho March on December 12, 2020?
8 MS. HALL: Object to form.
9 THE WITNESS: What march was that,
10 Mr. Bowman?
11 BY MR. BOWMAN:
12 Q The Jericho March on December 12th of
13 2020.
14 A All right. I have -- that came
15 through -- I don't believe there was any -- anything
16 from the campaign. I don't even know what that
17 march is.
18 Q Well, who would have been at the
19 campaign helping organize any kind of rallies or
20 marches during this time?
21 A During this time?
22 Q November and December of 2020.
23 A I mean, we had -- we had an advance
24 team, but I -- I don't know. It would have been --
25 yeah, it would have been our advance team.

Page 51

1 Q What does that mean, "advance team"?
2 A They were -- they were the team that
3 would usually go out before the president. But I'm
4 just trying to wrap my brain around rallies or
5 events, because the campaign -- I can't recall a
6 rally or event for the campaign.
7 Q Did the campaign have any role in
8 organizing the Stop the Steal rally on January 6th
9 of 2021?
10 A No, sir.
11 Q Did the campaign provide any financial
12 support for the Stop the Steal rally?
13 A No, sir.
14 MS. HALL: Object to form.
15 THE WITNESS: No, sir.
16 BY MR. BOWMAN:
17 Q Are you aware of the campaign making
18 any payments to Event Strategies Inc. after
19 November 3rd of 2020?
20 A I am not aware. I'm just trying to
21 think of the time frame, but off the top of my head,
22 no, sir.
23 Q Were any payments made to
24 American Media Consultants LLC in November, December
25 and early January?

Page 52

1 A Yes, sir.
2 Q What were those payments for?
3 A What -- what was the entity again?
4 Q American Media Consultants LLC.
5 A The entity is wrong. I think you're
6 asking for a different one.
7 Q Which different one do you think I'm
8 asking for?
9 A You said American Media Consultants?
10 Q Correct.
11 A It's -- that's not the name of the
12 entity I think you're referring to.
13 American Made Media Consultants? Yes.
14 Q Okay. I'm sorry. You're correct.
15 In our Topic 17, we listed
16 American Made Media Consultants. So are you aware
17 of payments to American Made Media Consultants LLC
18 after November 3rd of 2020?
19 A Yes, sir.
20 Q What were those payments for?
21 A Fundraising efforts. Digital
22 advertising.
23 Q Did American Made Media Consultants
24 handle digital advertising for the events on
25 January 6th of 2021?

Page 53

1 A No, sir.
2 Q What sort of digital media advertising
3 were they doing after November 3rd?
4 A Fundraising efforts, sir.
5 Q Did the campaign ever become concerned
6 that pushing the election -- the narrative of
7 election fraud could create social unrest or
8 violence?
9 MR. ZAKHEM: Object to form. Where
10 is -- where is this in terms of a topic?
11 MR. BOWMAN: I think it relates to
12 malice.
13 MR. ZAKHEM: Go ahead and answer.
14 THE WITNESS: Say it again, sir.
15 BY MR. BOWMAN:
16 Q Did the campaign ever become concerned
17 that pushing the narrative of election fraud could
18 create social unrest or violence?
19 MR. ZAKHEM: Object to form.
20 THE WITNESS: No, sir. I believe
21 there was -- there was and still is a lot of
22 social unrest, and people -- yeah, I don't -- I
23 don't have anything, sir.
24 BY MR. BOWMAN:
25 Q What was the role of Rudy Giuliani in

Page 54

1 planning the rally for January 6th of 2021?
2 MS. HALL: Object to form.
3 MR. ZAKHEM: Foundation.
4 THE WITNESS: You'd have to ask Rudy
5 that one, sir.
6 BY MR. BOWMAN:
7 Q Okay. We will.
8 Was Giuliani being paid for when he
9 would make public appearances or statements to the
10 public?
11 MR. ZAKHEM: Object to form. When are
12 you talking about? Let's make a better
13 question, if we can.
14 BY MR. BOWMAN:
15 Q Let's -- let's say between
16 November 3rd of 2020 and January 7th of 2021.
17 A Are you asking if we paid Mr. Giuliani
18 for legal services?
19 Q Well, I was specifically asking about
20 time he spent speaking to the public.
21 A No, sir.
22 Q So Giuliani was only paid for legal
23 services during that time; is that correct?
24 MR. ZAKHEM: Object to form.
25 THE WITNESS: No, sir.

Page 55

1 BY MR. BOWMAN:
2 Q So he was not paid for anything during
3 that time; is that right?
4 A Mr. Giuliani was reimbursed for
5 expenses.
6 Q But he was not paid as -- he was not
7 paid a legal fee?
8 A No, sir.
9 Q Is Mr. Giuliani currently seeking a
10 legal fee from the campaign?
11 A Not to my knowledge.
12 MR. BOWMAN: All right. Gentlemen,
13 let's take a five-minute break, restroom break,
14 and then I'll probably be able to wrap up.
15 (Whereupon, a short break was taken.)
16 THE VIDEOGRAPHER: Off the record,
17 11:06 Mountain Time.
18 (Whereupon, a short break was taken.)
19 THE VIDEOGRAPHER: Back on the record.
20 The time is 11:21 a.m. Mountain Standard Time.
21 MR. BOWMAN: Thank you.
22 BY MR. BOWMAN:
23 Q Mr. Dollman, just a few more
24 questions.
25 You mentioned that Rudy Giuliani was

Page 56

1 reimbursed his expenses by the campaign. Why were
2 his expenses reimbursed?
3 A Just standard procedure, I mean, even
4 if someone volunteered for a campaign and spent
5 money to do something, that the campaign would
6 reimburse their expenses.
7 Q Do you recall how much those expenses
8 were?
9 A In total, I think it was 139,000.
10 Yeah, I think -- Mr. Bowman, just -- it's a FEC
11 requirement if someone spends money on behalf of a
12 campaign, so...
13 Q Let's see -- and who is John Eastman?
14 A I'm unsure.
15 Q You don't know if he was an attorney
16 for the campaign or an in-house counsel?
17 A No, sir.
18 Q Are you aware of any representative of
19 the campaign meeting with Giuliani on January 5th at
20 a hotel to discuss the plans for the Stop the Steal
21 rally on January 6th?
22 MS. HALL: Object to form.
23 MR. ZAKHEM: This is January 5th,
24 2021?
25 MR. BOWMAN: Yes, correct.

Page 57

1 THE WITNESS: Like I mentioned before,
2 Mr. Giuliani and team, once they got COVID,
3 they never came in the office anymore. And I
4 never saw them again, so I am unaware of any
5 campaign personnel meeting with him on
6 January 5th, that was outside of the campaign
7 office.
8 BY MR. BOWMAN:
9 Q Once he stopped coming into the
10 office, you weren't aware of any communications
11 between the campaign and the Giuliani team?
12 MR. ZAKHEM: Object to the extent it
13 requires a disclosure of any privileged
14 communications.
15 You can answer if you can.
16 THE WITNESS: I'm unaware.
17 BY MR. BOWMAN:
18 Q Do you recall about when that time
19 period was when they had to leave after they got
20 COVID?
21 A I'm sure someone wrote an article
22 about it, but I am unsure of the time frame.
23 Q And who is Jason Miller with the
24 campaign?
25 A He was -- he worked in comms.

Page 58

1 Q How did his and Tim Murtaugh's --
2 where were they in terms of order and role with the
3 campaign?
4 MR. ZAKHEM: Object to form.
5 THE WITNESS: Tim Murtaugh was the
6 director of communications, and I believe
7 Jason Miller was a -- like a spokesperson for
8 the campaign.
9 BY MR. BOWMAN:
10 Q Are you aware of Jason Miller making
11 statements about Dominion Voting Systems or
12 Eric Coomer?
13 A Not to my knowledge, no, sir.
14 Q What was Boris Epstein's role with the
15 campaign?
16 A Boris Epstein, he -- he was kind -- he
17 was kind of a spokesperson on some -- and before the
18 election, after the election. So we, like I told
19 you before, like, we were winding people down and
20 moving people off. After November 3rd, I'm unsure
21 on what his role would have been on the campaign.
22 Q Are you aware of him ever making
23 statements about Dr. Coomer or
24 Dominion Voting Systems regarding election fraud?
25 A Unaware, sir.

Page 59

1 MR. BOWMAN: Mr. Dollman, I believe
2 I'm done with you, and I'll pass the witness.
3 Thank you for your time.
4 THE WITNESS: Thank you, sir. Have a
5 great weekend.
6 MR. ZAKHEM: I have no questions.
7 We'll sign and -- we'll review and sign.
8 THE COURT REPORTER: Okay. Anything
9 else from other --
10 MR. ZAKHEM: Sean, you're done.
11 Thanks, buddy.
12 THE WITNESS: Thank you, sir.
13 THE COURT REPORTER: Counsel, before
14 everybody -- let's -- let's --
15 THE VIDEOGRAPHER: Okay. Before we go
16 off, Court Reporter, do you need orders on the
17 record?
18 THE COURT REPORTER: That would be
19 helpful.
20 MR. ARRINGTON: Barry Arrington on
21 behalf of Sidney Powell, e-trans, no video.
22 MS. HALL: Andrea Hall on behalf of
23 Joseph Oltmann, FEC United and
24 Shuffling Madness Media, just the transcript,
25 electronic.

Page 60

1 MR. ZAKHEM: John Zakhem on behalf of
2 the Trump Campaign. We'll read and sign as
3 well as I want video on this one.
4 MS. BOEHMER: Margaret Boehmer on
5 behalf of Eric Metaxas, and we will take an
6 e-tran, please.
7 MR. JOHNSON: Brad Johnson on behalf
8 of OAN and Chanel Rion, and we would like an
9 e-transcript as well.
10 MR. CORPORAN: Randy Corporon for
11 TGP Communications and James Hoft, four to a
12 page, full concordance, please.
13 THE COURT REPORTER: Anyone else?
14 MR. BOWMAN: Zach Bowman here for
15 plaintiff. I believe we have a standing order
16 with Veritext where we get the same thing,
17 three days, a rush period. Same thing we have
18 been doing.
19 THE COURT REPORTER: No problem.
20 MR. BOWMAN: Thank you.
21 MR. ARRINGTON: And let me just put
22 this on the record. You know, we're paying
23 \$850 for copies, copies of these three-hour
24 transcripts. I will throw a fit if you try to
25 charge me \$850 for both of these

Page 61

1 hour-and-a-half transcripts.
 2 THE COURT REPORTER: Anything else for
 3 my record? Let's let the videographer take us
 4 off the record.
 5 THE VIDEOGRAPHER: All right. This
 6 concludes the depo of Sean Dollman. Off the
 7 record at 11:28 p.m. Mountain Standard Time.
 8 (Whereupon, the deposition concluded
 9 at 11:28 p.m.)
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

Page 62

1 DEPOSITION ERRATA SHEET
 2 Page Line From to
 3 _____
 4 _____
 5 _____
 6 _____
 7 _____
 8 _____
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 SIGNATURE: _____ DATE: _____
 20 Sean Dollman
 21
 22
 23
 24
 25

Page 64

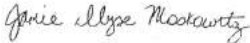
1 DEPOSITION REVIEW
 CERTIFICATION OF WITNESS
 2
 3 ASSIGNMENT REFERENCE NO: 4763484
 4 CASE NAME: Coomer v Donald J. Trump
 5 DATE OF DEPOSITION: August 13, 2021
 6 WITNESS: Sean Dollman
 7 In accordance with the Rules of Civil
 8 Procedure, I have read the entire transcript of my
 9 testimony or it has been read to me.
 10 I have listed my changes on the attached
 11 Errata Sheet, listing page and line numbers as well
 12 as the reason(s) for the change(s).
 13 I request that these changes be entered as
 14 part of the record of my testimony.
 15 I have executed the Errata Sheet, as well
 16 as this Certificate, and request and authorize that
 17 both be appended to the transcript of my testimony
 18 and be incorporated therein.
 19 _____
 20 Date Sean Dollman
 21
 22 Sworn to and subscribed before me, a
 23 Notary Public in and for the State and County, the
 24 referenced witness did personally appear and
 25 acknowledge that:
 They have read the transcript;
 They have listed all of their corrections
 in the appended Errata Sheet;
 They signed the foregoing Sworn Statement;
 and
 Their execution of this Statement is of
 their free act and deed.
 I have affixed my name and official seal
 this _____ day of _____, 20_____,

 Notary Public

 Commission Expiration Date

 Job No. TX4763484

Page 63

1 CERTIFICATE
 2
 3 I, Jamie I. Moskowitz, a Shorthand
 4 (Stenotype) Reporter and Notary Public, do hereby
 5 certify that the foregoing Deposition, of the
 6 witness, Sean Dollman, taken at the time and place
 7 aforesaid, is a true and correct transcription of my
 8 shorthand notes.
 9 I further certify that I am neither
 10 counsel for nor related to any party to said action,
 11 nor in any way interested in the result or outcome
 12 thereof.
 13 IN WITNESS WHEREOF, I have hereunto set
 14 my hand this 18th day of August 2021
 15
 16 
 17 Jamie Ilyse Moskowitz
 18 License No. XI01658
 19
 20
 21
 22
 23
 24
 25

Page 65

1 jszakhem@jacksonkelly.com
2 August 18, 2021
3 Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.
4 DEPOSITION OF: Sean Dollman (Corp Rep) , Vol 2 (# 4763484)
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

Page 66

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

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

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

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

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

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

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

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