

<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 P DECLARATION OF MIKE ROTHSCHILD</p>	

I, Mike Rothschild, declare and state as follows:

1. “My name is Mike Rothschild. I am over the age of twenty one years, am of sound mind, and am fully competent to make this Declaration. I have personal knowledge of the matters stated in this Declaration, which are true and correct.

2. “I am a journalist who has spent the last decade writing about the intersection between the internet and fringe culture. I have written for a number of news outlets and websites on topics ranging from conspiracy theories and fraudulent medical treatments to hoaxes and moral panics. Most recently, I have focused my research and writing on the QAnon conspiracy theory, becoming one of the first journalists to examine its growth from a series of message board posts to an international movement with a long string of crimes behind it. I am uniquely positioned to write a declaration on what QAnon is, and how it is connected to both the 2020 election and to this case.

3. “I am the author of hundreds of articles and two books, including 2021’s “The Storm is Upon Us: How QAnon Became a Movement, Cult, and Conspiracy Theory of Everything,” published by Melville House in June. This was the first book to examine the QAnon movement from its predecessors in the world of scams and anti-Semitic tropes, through its expansion on the internet, and up until the aftermath of the January 6, 2021 insurrection. As part of promoting the book and educating the public on the recent growth of the QAnon movement, I have appeared live on CNN on several occasions, on MSNBC, NPR, the Peacock streaming network, and the BBC. I have also been interviewed or had my book featured by the Washington Post, the New York Times, NBC News, Vice, the Guardian, the New Yorker, Rolling Stone, the Daily Beast, the Financial

Times, Politico, Bloomberg, Forbes, and many other national and international news outlets and podcasts. I have guest lectured at Texas Christian University and the University of Miami, and appeared on numerous panels related to conspiracy theories and antisemitism, including a scheduled appearance at the NYPD's Cybercrime and Counterterrorism conference.

4. "In this declaration, I intend to establish how QAnon is tied to the defendants in this case. I will show how they frequently and publicly espoused its violent mythology, monetized its following, and used it as a basis to spread conspiracy theories about the election being stolen in favor of Donald Trump, and about Dr. Coomer's alleged role in this fraud. I also intend to show the parallels between the harassment and crimes of QAnon believers at large and the harassment directed toward Dr. Coomer. Finally, I intend to show how the allegations against Dr. Coomer had their roots in the preconceived determinations pushed by Q and its promoters – starting with the belief that Joe Biden could only win a fraudulent election, pinning the blame for that fraud on Dominion Voting Systems and Dr. Coomer, and working backwards to find or create evidence that would bolster that conclusion.

Intro—The Leadup to the 2020 Election

5. "The 2020 presidential election in the United States saw an explosion of conspiracy theories that began months before the first vote was cast, and has continued long after the final result was certified.

6. "President Trump and his most fervent devotees posited that his opponent, Joe Biden, was hidden in a basement and incapable of basic campaign functions,

governing, or even of speaking coherently. Such a candidate could never beat Donald Trump fairly, with victory only possible through massive and organized fraud at every level—stealing votes, rigging machines, conjuring ballots out of nowhere, and doing it with the support of multiple foreign actors.

7. “As such, after Biden’s victory (which polling indicated was nowhere near as improbable as Trump’s campaign claimed it was), Trump’s supporters kept their scenario in mind to determine what “really” happened. They created a vast conspiracy encompassing a cabal of the entire Democratic party, election administrators, voting machine companies, local governmental bodies, the courts, and the media. And this cabal’s goal was singular: steal the election and make it look legitimate. The consequences of what would become known as “The Big Lie” of the “stolen election” were profound—and directly led to the U.S. Capitol riot.

8. “None of the “stolen election” industry came out of nowhere, nor was it difficult to see coming if one knew where to look- it was all over the places where conspiracy theorists and Trump supporters congregated online, with no attempts made to hide its inherent disregard for election law and procedure. Most of all, it was visible in every mysterious post by the conspiracy theory avatar known as “Q” and the movement that had grown around it—the QAnon conspiracy theory.

9. “Many of the Defendants have direct social ties to QAnon, having appeared on QAnon media or shared QAnon catchphrases with their followers. Some have even actively promoted it at events and made money off it. In particular, the originator of the most dangerous claims against Dr. Eric Coomer was Joe Oltmann, who is deeply

embedded in the QAnon movement. Beyond espousing Q's mythology, Oltmann has lavished praise on Ron Watkins, the former 8chan administrator and "white hat hacker" who presented himself as an expert in voting machine technology and how flaws in it could be exploited by malicious actors. Ron Watkins does not have any experience in election administration, vote tabulation software, penetration testing, or computer hacking, but he was responsible for mainstreaming some of the biggest conspiracy theories about Dominion and Dr. Coomer through his affiliation with QAnon.

10. "Watkins is the figure¹ most believed by disinformation journalists and researchers to either be the actual writer of the "drops" posted by the anonymous Q poster or to be directly linked to Q. While Watkins has not been confirmed as the actual creator of Q or the poster of the drops, numerous pieces of circumstantial evidence point to Ron having direct control over Q's posts. The two have very similar writing styles and use almost identical phrases between Q's drops and Watkins' other social media. Q would regularly post pictures of objects Ron Watkins was known to collect, including expensive watches and pens. Q was also the first account able to post on a new version of 8chan (called 8kun") making new "drops" even before Watkins himself posted on the new board, despite him being the administrator of the site. Finally, Watkins all but admitted that he was posting as Q during the last episode of the HBO documentary "Q: Into the Storm" before he quickly backtracked.

¹ Drew Harwell and Craig Timberg, *A QAnon revelation suggests the truth of Q's identity was right there all along*, WASHINGTON POST, Apr. 5, 2021, <https://www.washingtonpost.com/technology/2021/04/05/ron-watkins-qanon-hbo/> (last visited Aug. 27, 2021).

11. “While Watkins continues to deny that he has anything to do with QAnon, the moment Ron left as admin of Q’s home 8kun, Q essentially stopped making drops—there would be only four posts by Q between the election and December 6, which was the day of Q’s final drop. But Ron, who rarely tweeted up to that point, suddenly began tweeting dozens of times a day—all of which are accessible only through the Internet Archive thanks to the permanent suspension of his account. And virtually all of them were about fraud he said he found in the administration of the ballot count by Dominion Voting Systems.

12. “Ron Watkins’ claims of fraud, driven by his “expertise” in “penetration testing” and from reading Dominion technical documents, were in turn picked up by right wing media figures who have either paid lip service to QAnon or directly endorsed it—while spreading similar theories about Dominion and Coomer. One was Joe Oltmann, who may have already identified Dr. Coomer as what he thought was a perpetrator of the fraud through his position with Dominion, and worked backwards to tie him to it, using the supposed “antifa conference call.” But there were many others. QAnon’s conspiracy theories were used either indirectly or directly by every Defendant to propagate the claims against Dr. Coomer and tie him to a vast fraud supposedly executed at the highest levels of the election infrastructure – a fraud Q had spent a year promoting. It is vital to this case to understand what QAnon is, where it came from, the danger it presents, and how each person who defamed Dr. Coomer is tied to this violent and cult-like movement.

What is QAnon?

13. “By its very nature, QAnon is extraordinarily complex. But to boil it down, QAnon believers think that a team of military intelligence officers closely linked to Trump used the image boards 4chan and 8chan/8kun to leak cryptic clues to an upcoming purge of the deep state. Those clues - called “drops” - contain not classified information, but riddles and rhetorical questions that are “decoded” using the day’s news and social media communications as a primer. They are meaningless nonsense to those outside the group—but to those inside the group, they are the keys to unlocking a storehouse of knowledge that will help save the world from evil.

14. “They reveal the details of a secret and silent war being fought between patriotic “white hats” in the Trump movement and Satanic “black hats” in the Democratic Party, the entertainment industry, big business, and the news media. In this story, that war would only end with “the storm”—mass arrests carried out through secret indictments that could only be unsealed by Donald Trump. They would lead to field tribunals carried out by the military, with the verdict always “guilty” and the penalty always death. Afterwards, a new age of peace and harmony would follow. Q believers, then, are not nihilists who want to watch the world burn, they’re utopians who believe they want to make it better.

15. “While Ron Watkins is the likeliest suspect, the mysterious “Q” who made the posts has never been identified, and might never be. But what’s most important to understand about Q’s posts is that they require no classified information to write, and rarely contain anything that is not publicly available or easily made up. Many are simply

nonsensical phrases or unanswerable questions. It is likely that several different people served as “Q” over the years, authenticated by a “tripcode” used by 8chan to ensure the authenticity of who was making the posts.

16. “Over 4,900 of these “drops,” Q spun a technothriller like a Tom Clancy novel, with good guys and bad guys fighting in both the real world and cyberspace for control of the world. The drops were cryptic, predictive, often unintelligible, sometimes contradictory, repetitive, and addicting. They formed the scripture of a movement that resembles a new religion just as much as it does a cult—with a twist that allows believers to play a central role in that secret war. And to fight requires no military or intelligence training. All you have to do is have Internet access, read the Q drops, and participate in the collective fiction that you are saving the world.

17. “Both before and during the COVID-19 pandemic, Q’s message of utopia through extrajudicial means gave believers hope, made them feel special, and let them in on secret knowledge that “they” did not want anyone to have. And an ecosystem of Q promoters and far right figures—some of whom are at the heart of this case—ruthlessly took advantage of their belief. As early as July 2019, Q started posting conspiracy theories about the election being rigged, even before Trump had an opponent. It did not matter who ran against him, they were deemed crooked and just a pawn in the game of an evil cabal that Q was finally going to take down.

How is Q linked to the 2020 election?

18. “In late 2019 and 2020, Q rarely deviated from the overall story about the election: the Democrat, eventually Joe Biden, would never be able to win without massive

and systemic fraud at all levels of the election and its administrators. Even before Biden locked down the Democratic nomination, Q attacked the former vice president's age, mental health, financial dealings, past history, previous allegations, and previous record as a senator and vice president. *"HOW DO YOU SHELTER [BIDEN] FROM DEBATES? HOW DO YOU SHELTER & PROTECT [BIDEN]?"* blared drop #4245 in May, backing up the claim that the Democrats would "change out" the nominee in a convention moved as close as possible to Election Day. Echoing Trump, Q claimed that the mail-in voting push being driven by the pandemic was part of a massive scheme to steal the election through "harvesting," that the polls were rigged to show support for Biden, and that China would be participating in the fraud by "cloning" ballots from battleground states. Drop #4738,² On September 20, 2020, less than six weeks before the election, painted exactly how the election would be stolen and how the deep state would stop at nothing to force Trump out:

How do you 'extend' lockdown(s) [economic hardship(s), unemployment, fear, death count, dementia Joe, etc.] in order to paint narrative mail-in voting [when did narrative start (March?_early?_planned?)] needed to 'save' lives [+ballot harvesting] in order to generate a future narrative election day +1 which casts doubt as to legitimacy of POTUS win [Constitutional Crisis][“not all mail-in ballots counted” “how many mail-in ballots lost or did not arrive in key battleground states which could have returned a different result” “we must investigate who cast a vote but it did not register” “we must go door-to-door if needed [ballot harvest]” “our lives are at stake” “the sky is falling” in order to legally challenge, delay results, enact riots and chaos in an attempt to overturn [coup d’etat].

CRIMES AGAINST HUMANITY?

² <https://qposts.online/post/4738> (last visited Sep. 13, 2021).

19. “As the march toward the election continued, Q stuck to the same message of upheaval, reiterating that Biden had no chance of winning fairly. There would be “election day riots, protests, and [COVID-19] death” unleashed to stop senior citizens from voting. There would be massive harvesting of mail-in ballots, convicts released from prison to vote Democratic, the arrest of in-person voters, a ramping up of COVID-19 hysteria, and wholesale social media censorship.

20. “None of that took place, nor was there ever any possibility that it would. But after a few late swings in the wee hours of November 4, 2020, thanks to urban voting centers turning ballots in late—just as election experts widely predicted would take place—it was all over, and a few days later, Biden and Kamala Harris publicly declared their victory. Troll message boards and Twitter immediately became hives of disinformation about voter fraud and ballot rigging, shooting the “best” theories straight up the hierarchy of bigger media figures. Q promoters quickly claimed that Trump not only had won, but he had won 400 Electoral College votes in a landslide. Once the fraud was revealed, the corruption would be so obvious that Biden would have to concede and Trump (through means that have never been fully explained) would continue with his presidency.

21. “The churn of “Trump actually won” conspiracy theories was so powerful that at one point, 5% of all tweets about the election were coming from Q-linked Twitter accounts—a firehose of conspiracy theories, threats, boasts, and reality-warped declarations that the military was going to step in and invalidate the results of the election.

And much of this was directed at Dominion and its employees. The nonprofit Advance Democracy calculated³ that 1 in 7 tweets about “#Dominion” since November 5, 2020, originated from QAnon accounts. Tweets featuring the #Dominion hashtag rose from about 75 to over 35,700 each day shortly after the election. Days later, a noose was left⁴ at the front door of a 20-year-old Dominion contractor in Georgia after top figures in the “stolen election” coalition tweeted video of him “harvesting ballots”—in reality, a video of him inserting a thumb drive into a laptop and saving a file on it.

22. “And then came the allegations against Dr. Coomer—a high-ranking employee of the firm under attack for “single-handedly” swinging the election to Trump. Even though such a thing was impossible, the conspiracy theories against him were boosted by figures both close to Trump and close to QAnon. All of the Defendants relied in some way on the theories put forth by QAnon and its promoters, and gave those promoters a platform to spout these theories, with no regard to the violent acts committed by some of the people who believe these theories were facts.

QAnon believers and their violent acts

23. “When Dr. Coomer was forced to go into hiding, it was not because of idle threats or harmless trolling or even unwarranted paranoia—it was because the followers of a violent conspiracy theory had targeted him for punishment as a traitor, based on the

³ Ben Collins, *QAnon’s Dominion voter fraud conspiracy theory reaches the president*, NBC NEWS, Nov. 13, 2020, <https://www.nbcnews.com/tech/tech-news/q-fades-qanon-s-dominion-voter-fraud-conspiracy-theory-reaches-n1247780> (last visited Aug. 27, 2021).

⁴ Rachel E. Greenspan, *A QAnon harassment campaign led to a noose being left at the home of a young Dominion contractor, according to a Georgia official*, INSIDER, Dec. 3, 2020, <https://www.insider.com/dominion-voting-qanon-harassment-campaign-noose-georgia-fraud-2020-12> (last visited Aug. 27, 2021).

statements of figures they trusted, backed up by the mythology of the movement they belonged to.

24. “QAnon social media is full of references to Democrats being hanged, shot, beheaded, or otherwise executed. Q drops speak of “eliminating” supposed pedophiles and of progressive luminaries being “unable to walk down the street” due to summary mob violence. And these are not always idle threats. A number of murders have been linked to QAnon, including a Seattle QAnon believer who rammed a four-foot-long sword through his brother’s head, believing him to be a threatening lizard humanoid. Two months after that, 24-year-old Staten Island laborer Anthony Comello shot and killed Gambino family mob boss Frank Cali after becoming convinced that Cali was a member of the “deep state.” And most recently, a California man was arrested in August 2021 for murdering his two young children in Mexico, reportedly influenced by his beliefs in QAnon and the “lizard alien” conspiracy theory.

25. “Beyond that, nearly 100 other acts of domestic terrorism, vandalism, assault, kidnapping, child abduction, and endangerment have been committed by QAnon acolytes. There were also numerous QAnon arrests from the Capitol invasion of January 6, 2021, including former Air Force member Ashli Babbitt, shot by Capitol police while climbing through a smashed window of the Speaker’s Lobby, after expressing her delight at the coming “storm” on social media the day. In a May 2019 memo, the FBI’s Phoenix field office identified QAnon by name as one of several high-profile “fringe political” movements that “tacitly support or legitimize violent action,” and that attract “conspiracy theory-driven domestic extremists” who are motivated to act on their beliefs.

26. “And those are only the physical acts of violence. The troll communities that birthed QAnon specialize in organized online harassment. According to archived posts, searchable using the Q aggregator site qresearch.ch, Coomer’s name was mentioned⁵ over 1,100 times on the Q research board on 8chan or its successor 8kun in the weeks after the Oltmann “Antifa call” was revealed—often attached to threats.

27. “8kun posters referred to Dr. Coomer as “treasonous,”⁶ a “Trump-hating Antifa sociopath”⁷ and a “radical leftist” and “asshole” who should “see the inside of a cage real soon.”⁸ Based on fake stories, users on the Q Research board claimed Coomer had been used in Georgia to testify as to the need for “last minute computer changes”⁹ on vote printing machines that he had personally invented, claimed he had an “alt-right hitlist”¹⁰ of thousands of names, admitted that Dominion “fractionalized votes,”¹¹ and rehashed Joe Oltmann’s claims that Dr. Coomer confirmed on an “antifa conference call”¹² that he had singlehandedly rigged the election. Notably, Oltmann has never provided proof that the “Eric” he claimed to have heard on this call was Eric Coomer.

⁵ QReser.ch, The 8chan/8kun QResearch Board Search, <https://qresearch.ch/?q=coomer> (last visited Aug. 27, 2021).

⁶ <https://8kun.top/qresearch/res/11825209.html#11825991> (last visited Aug. 27, 2021).

⁷ <https://8kun.top/qresearch/res/11774276.html#11774707> (last visited Aug. 27, 2021).

⁸ <https://8kun.top/qresearch/res/11805376.html#11805744> (last visited Aug. 27, 2021).

⁹ <https://8kun.top/qresearch/res/11829866.html#11830482> (last visited Aug. 27, 2021).

¹⁰ <https://8kun.top/qresearch/res/11807707.html#11808217> (last visited Aug. 27, 2021).

¹¹ <https://8kun.top/qresearch/res/11836083.html#11836792> (last visited Aug. 27, 2021).

¹² <https://8kun.top/qresearch/res/11825209.html#11825973> (last visited Aug. 27, 2021).

28. “Other posts went even further, using violent and anti-Semitic rhetoric¹³ to claim Coomer had disappeared,¹⁴ or was in the custody¹⁵ of an unspecified entity after being “detarined [sic] and under arrest for about a week.”¹⁶ “Death to Coomer!”¹⁷ proclaimed one post, while others asked “has Coomer been indicted yet”¹⁸ or if members of the violent gang MS-13¹⁹ could be hired to “find” him.

29. “QAnon’s threats can and do have serious consequences both online and offline—and those consequences have been stoked in one form another by all of the Defendants in this case.

How Q is linked to each Defendant

30. “While some defendants are more connected to QAnon than others, all of them have at least some connections to it. Many have shared QAnon content, appeared on QAnon media, boosted QAnon theories, pandered to QAnon followers, and raised money at QAnon-linked events. Several have spoken frequently to Q promoters or been interviewed by them. Some have profited off QAnon merchandise or spoken at Q-themed events that charge enormous sums for VIP tickets. More importantly, none have rebuked it. Even the ones who claim they do not know what it is or have never heard of it

¹³ <https://8kun.top/qresearch/res/11976913.html#11977719> (last visited Aug. 27, 2021).

¹⁴ <https://8kun.top/qresearch/res/11804596.html#11804841> (last visited Aug. 27, 2021).

¹⁵ <https://8kun.top/qresearch/res/11804596.html#11804926> (last visited Aug. 27, 2021).

¹⁶ <https://8kun.top/qresearch/res/11842259.html#11842373> (last visited Aug. 27, 2021).

¹⁷ <https://8kun.top/qresearch/res/11895746.html#11896463> (last visited Aug. 27, 2021).

¹⁸ <https://8kun.top/qresearch/res/14027952.html#14028701> (last visited Aug. 27, 2021).

¹⁹ <https://8kun.top/qresearch/res/11852212.html#11852353> (last visited Aug. 27, 2021).

constantly play to the crowd of believers that Q has ensnared, being careful not to discount their beliefs, and exploiting them for money.

Donald Trump

31. “While the former president is not a defendant, his campaign is. And as both the 2016 and 2020 elections made clear, there was little separation between Trump’s utterances and those of his official campaign spokespeople and lawyers. And many of those utterances centered around QAnon.

32. “By the 2020 election,²⁰ Trump was regularly sharing the memes and slogans created by members of the movement, often acting like he had no idea what they were about. In March 2020, as COVID-19 panic was dominating the country, Trump responded to the chaos with a Twitter meme²¹—of him playing a fiddle with the text “MY NEXT PIECE IS CALLED . . . NOTHING CAN STOP WHAT’S COMING,” with Trump himself adding, “Who knows what this means, but it sounds good to me!” That retweet was just one of the 315 separate times Trump would retweet or boost content from QAnon believers before he was banned from Twitter after the January 6, 2021 riot. Among these were five retweets of Ron Watkins,²² including one where Watkins told followers “If you are planning to attend peaceful protests in DC on the 6th, i [sic] recommend wearing a body camera.” It is not clear if Trump actually knows what QAnon is or its history of

²⁰ Tina Nguyen, *Trump isn’t secretly winking at QAnon. He’s retweeting its followers.*, POLITICO, July 12, 2020, <https://www.politico.com/news/2020/07/12/trump-tweeting-qanon-followers-357238> (last visited Aug. 27, 2021).

²¹ Timothy Bella, *Trump tweets a meme of himself fiddling, drawing a comparison to Roman emperor Nero*, WASHINGTON POST, Mar. 9, 2020, <https://www.washingtonpost.com/nation/2020/03/09/trump-coronavirus-nero-qanon/> (last visited Aug. 30, 2021).

²² <https://www.thetrumparchive.com/?searchbox=%22codemonkeyz%22> (last visited Aug. 30, 2021).

violence. But he knew his supporters were also Q’s supporters. So tacitly supporting Q offered nothing to lose—until the time came to express it openly.

33. “A few months after the fiddle meme, Georgia House candidate and Q promoter Marjorie Taylor Greene came up at a Trump August 2020 news conference. And after years of not so much as mentioning Q, Trump said²³ of the people who had spent almost three years idolizing him: “I don’t know much about the movement, other than I understand they like me very much, which I appreciate.” “If I can help save the world from problems, I am willing to do it,” Trump continued. “I’m willing to put myself out there. And we are actually, we’re saving the world.” It was a pivotal moment in the mainstreaming of QAnon, with the figure they revered most validating them at the highest level. That October, Trump praised QAnon again,²⁴ telling the NBC host Savannah Guthrie that he knew nothing about it, but “what I do hear about it is they are very strongly against pedophilia, and I agree with that.”

34. “Whether or not the person or people behind the Q drops was coordinating with Trump and his team has never been proven, and is not relevant. They were working toward the same goal and using the same methods—spreading unevidenced claims about the election being rigged on behalf of Biden. And those claims, particularly the ones about

²³ Colby Itkowitz et. al., *Trump praises baseless QAnon conspiracy theory, says he appreciates support of its followers*, WASHINGTON POST, Aug. 19, 2020, https://www.washingtonpost.com/politics/trump-praises-baseless-qanon-conspiracy-theory-says-he-appreciates-support-of-its-followers/2020/08/19/e50f8d46-e25e-11ea-8181-606e603bb1c4_story.html (last visited Aug. 30, 2021).

²⁴ Emily Stewart, *Savannah Guthrie delivered the Trump interview we’ve been wanting for years*, VOX, Oct. 15, 2020, <https://www.vox.com/policy-and-politics/2020/10/15/21518763/savannah-guthrie-trump-town-hall-nbc-miami> (last visited Aug. 30, 2021).

Dr. Coomer, originated from one particular Trump supporter and Q-adjacent figure: the podcaster and business owner Joe Oltmann.

Joe Oltmann

35. “Colorado conspiracy theorist Joe Oltmann has multiple connections to QAnon, even though he is far from being its most visible promoter. On the Conservative Daily podcast, which Oltmann co-hosts, he routinely used his platform to run down countless conspiracy theories about election fraud, often taking time to single out Ron Watkins for praise.

36. “Matter of fact, there’s a guy called CodeMonkey that has out there that’s actually gone through all of the schematics inside Dominion Voting Systems,” Oltmann claimed on a November 13, 2020 appearance²⁵ using Watkins’ well-known social media screen name on to refer to him. “And he goes ‘I could hack this in fifteen minutes.’ He said that. He’s like I could hack it in fifteen minutes.” All the while, viewers to the show’s YouTube livestream responded with Q slogans and praise for Watkins, demonstrating that they knew exactly who he was talking about.

37. “The next day, on Denver-based radio host Randy Corporon’s show, Oltmann continued praising Watkins²⁶ and his abilities as an elite hacker with top-level skills. “There’s a guy named Code Monkey, that goes by Code Monkey that has been digging into it. He’s been doing some amazing research” Oltmann claimed, before

²⁵ Joe Oltmann, *More Evidence of Fraud, Irregularities, and Gross Incompetence*, CONSERVATIVE DAILY, Nov. 13, 2020, at 14:48 <https://www.youtube.com/watch?v=1qr-ZAfA1B8> (last visited Aug. 30, 2021).

²⁶ *Wake Up! with Randy Corporon*, 710 KNUS, Nov. 14, 2020, at 38:29 <https://omny.fm/shows/wake-up-with-randy-corporon/wake-up-with-randy-corporon-november-14-2020-hr3> (last visited Aug. 30, 2021).

launching into a completely evidence-free conspiracy theory that Dominion servers “have been seized in Germany” after a shootout between US intelligence agencies. And on another Corporon appearance on November 21, 2021,²⁷ Oltmann again gushed with praise for the 8kun administrator.

38. “There’s a guy named Code Monkey out there on Twitter. The guy is brilliant. This kid is brilliant. Matter of fact, if he’s listening, I don’t even know what state he’s in, I’d like to hire him,” Oltmann exclaimed of Watkins, who lived in Sapporo, Japan at the time. “He is brilliant because he examines the efficacy of the code, he actually examines how the code actually interacts and how they actually have collected information to tell in the manuals how Dominion works, but nobody is listening to it, because frankly, this is my opinion, it is a modern-day coup.”²⁸

39. “And Oltmann praised Watkins one more time on Conservative Daily on December 3, 2021, declaring that “there’s Americans out there that are like, I’ve had enough. Like CodeMonkey, Ron [Watkins], the guy is amazing. There are people out there that are digging everything up.”²⁹ At the same time, Oltmann also began to parrot the conspiracy theories of Michael Flynn, the former Trump NSA who has become a pivotal figure in the QAnon community. Flynn’s public utterances have drifted toward the sanctioning of violence to restore Trump to office, most recently when he agreed with

²⁷ *Wake Up! with Randy Corporon*, 710 KNUS, Nov. 21, 2020, at 42:48 <https://omny.fm/shows/wake-up-with-randy-corporon/wake-up-with-randy-corporon-november-21-2020-hr-1> (last visited Aug. 30, 2021).

²⁸ *Id.*

²⁹ Joe Oltmann, *Shameful Dems Attacking Election Witnesses!*, CONSERVATIVE DAILY, Dec. 3, 2020, at 50:54 <https://www.youtube.com/watch?v=5mIW4ymoJEM> (last visited Aug. 30, 2021).

an attendee at a QAnon conference in Dallas that there was “no reason” why a “Myanmar style coup” should not take place in the US.

40. “On the December 4 episode of Conservative Daily, Oltmann said³⁰ that Flynn’s suggestion that Trump declare martial law and “have everybody revote” was “a brilliant strategy” that was possible, though “dicey with the Constitution.” And on the 29th, Oltmann echoed Flynn’s claim that “big arrests were coming”³¹ in response to the “fraud,” which is a constant talking point of QAnon – mass arrests are always on the verge of taking place, while never actually taking place.

41. “None of these appearances drew enormous traffic or went viral—most of the livestreams of Conservative Daily only had a few thousand views. But they put Oltmann on the map for bigger figures in the right-wing media sphere, who *did* have the audience to put these claims into mainstream circulation. Taken together, they show a pattern of Oltmann constantly deifying of one of QAnon’s most critical figures in ways that would be picked up by major conservative pundits. And that wasn’t his only link to the QAnon conspiracy theory. Just this June, six months after Biden’s inauguration, Oltmann appeared in a live panel with numerous other Q-linked figures at the world premiere of fellow Q promoter Patrick Byrne’s film “The Deep Rig,” which supposedly blew the lid off the massive effort to illegally throw the election. Oltmann also appears in the film, repeating many of his claims about Dominion and the Dr. Coomer “conference

³⁰ Joe Oltmann, *Get In Here: Smoking Gun Evidence of Fraud in Georgia*, CONSERVATIVE DAILY PODCAST, (Dec. 4, 2020), <https://www.youtube.com/watch?v=l3CEhIHlq3w&t=2940s> (last visited Sep. 13, 2020).

³¹ Joe Oltmann, *Mike Pence Can Stop the Steal*, CONSERVATIVE DAILY PODCAST, (Dec. 29, 2020), <https://caincloud.egnyte.com/dl/e4GDVEDLq2/> (last visited Sep. 13, 2021).

call.” During the panel, Oltmann claimed that believers in Trump’s victory would have to “do something after the election that is going to be pretty drastic”—all but encouraging violence against the “crooked” officials who Oltmann and his compatriots believed stole the election.

42. “And the QAnon connections between Oltmann, and “The Deep Rig” crew go even further. Moderating the panel³² was conspiracy theory personality Ann Vandersteel, a live-streamer who has evangelized QAnon, appeared on the 24-hour QAnon-themed YouTube channel Patriot’s Soapbox, and endorsed Q’s theories about deep state pedophile rings running the western world. “I’m pretty sure there is a very comprehensive strategy about the way they are going to roll out this sort of information,” Vandersteel said in a 2019 Patriot’s Soapbox appearance where she falsely claimed to be an official spokesperson for Trump’s 2020 campaign. “Q has been preparing a lot of people.”

43. “Finally, Oltmann’s political organization FEC United was, at one point, contracted to provide security³³ through its armed militia, United American Defense Force, for a QAnon-themed anti-lockdown gathering in May 2021 in Denver. Despite being disinvited from both providing security and speaking, Oltmann sent multiple armed

³² Joseph Cooke, “*The Deep Rig*’ movie on 2020 election premieres, AZ CENTRAL, <https://www.azcentral.com/picture-gallery/news/politics/arizona/2021/06/27/the-deep-rig-movie-2020-election-premiere-dream-city-church-phoenix/5364337001/> (last visited Aug. 30, 2021).

³³ Erik Maulbetsch, *Colo GOP Legislator Begg Activists at QAnon-Linked Anti-Vax Rally to ‘Continue to Broadcast the Facts’*, COLORADO TIMES RECORDER, May 17, 2021, <https://coloradotimesrecorder.com/2021/05/colo-gop-legislator-begg-activists-at-qanon-linked-anti-vax-rally-to-continue-to-broadcast-the-facts/36495/> (last visited Aug. 30, 2021).

UADF members to the rally, which featured a plethora of conspiracy theories about vaccines, antifa, and the election—all central QAnon tenets.

44. “Even after being banned from Twitter, Oltmann has continued using the messaging app Telegram, now the preferred social media of QAnon promoters, to spout pro-Q messages and harass Dr. Coomer. As of late August 2021, Oltmann has made nearly a dozen references to Dr. Coomer. He claimed Coomer and Dominion were “getting closer and closer to the jail door” on June 16, 2021.³⁴ In a long post on Telegram on June 21, Oltmann claimed “Eric Coomer is being wiped off the internet,” with “videos, articles [and] testifying all being deleted.”³⁵ This was not entirely false - while this occurred long before Oltmann made his claims about Dr. Coomer being “wiped from the internet,” Dr. Coomer appears to have taken the standard precaution of scrubbing his personal information and social media in response to the constant death threats he had begun to receive shortly after the election. Oltmann also claimed in June that “in the next few days” he would be releasing evidence “showing my inquiry into Eric Coomer long before I even knew who he was.”³⁶ He reiterated the claim later that day, but never ended up posting anything matching that description.

45. “Later, there was a blog post calling Dr. Coomer “the man behind rigging the 2020 Presidential Election” on July 9, 2021. And on July 16, 2021, Oltmann rhetorically asked “Compromised system. Who ran the security for Dominion? The

³⁴ Joe Oltmann, TELEGRAM, June 16, 2021, <https://caincloud.egnyte.com/dl/7SV4VRihMn/>? (last visited Aug. 31, 2021).

³⁵ Joe Oltmann, Telegram, June 21, 2021, <https://caincloud.egnyte.com/dl/aYewdF5oQv/>? (last visited Aug. 31, 2021).

³⁶ *Id.*

director of strategy and SECURITY, Eric Coomer . . .” with pointing finger emojis pointing to a forwarded message from Michael Flynn with a meme repeating the false claim “GUILTY! THOUSANDS OF DUPLICATE BALLOTS WITHOUT SERIAL NUMBERS IN BOXES.”³⁷ On August 1, 2021, he challenged Dr. Coomer to a fist fight. And on August 19, 2021, as Oltmann faced a motion to be held in contempt for refusing to sit for testimony in this case (he flew to South Dakota to speak at MyPillow founder Mike Lindell’s “cyber symposium” alongside Ron Watkins, instead), he continued to attack Coomer on Telegram, calling his attorneys “leftist radical liars,” while insinuating the judge in the case is a member of antifa.

46. “While Oltmann’s links to QAnon might not be as extreme as other figures on the far right, his story about hearing Dr. Coomer on the “Antifa conference call” and his constant praise for the figure most likely to be behind Q tarnishes every more popular figure up the disinformation pyramid who picked up the claims.

Michelle Malkin

47. “The conservative author and media figure was the first major right-wing pundit to amplify Joe Oltmann’s claims. It was her November 13, 2020 interview with Oltmann that pushed his story about being on a supposed “antifa conference call,” where Dr. Coomer claimed he “made sure” that Trump would not win, into the mainstream and to a whole new audience of conspiracy believers. Malkin has not boosted QAnon as much

³⁷ Robert Farley, et. al., *Debunking Trump’s Latest Arizona Election Claims*, FACTCHECK.ORG, July 20, 2021, <https://www.factcheck.org/2021/07/debunking-trumps-latest-arizona-election-claims/> (last visited Aug. 30, 2021).

as many other figures involved in this lawsuit, but she has defended QAnon believers and given their ideas traction.

48. “In the runup to the 2020 Republican National Convention, a woman named Mary Ann Mendoza was slated to speak as an “angel mom” whose son was killed in a car crash with an intoxicated undocumented immigrant. But Mendoza was pulled as a speaker³⁸ after retweeting an extremely antisemitic thread written by a QAnon account called “War Nuse.” Malkin, in turn, vociferously defended Mendoza³⁹ by using antisemitic tropes about Jewish philanthropist George Soros—a frequent Q target. Malkin has also stood with QAnon-promoting Delaware congressional candidate⁴⁰ Lauren Witzke, decrying Witzke’s “financial censorship”⁴¹ after Witzke had her Wells Fargo account suspended.

One America News Network

49. “After Malkin boosted Oltmann’s unevidenced claims, they found further support from the right-wing news outlet One America News Network. While it was OANN presenter Chanel Rion who did the most to further Oltmann’s claims against Dr. Coomer, at least three other personalities on the network have advanced QAnon mythology as well.

³⁸ Hallie Jackson and Dareh Gregorian, *RNC cancels speaker Mary Ann Mendoza after she promoted QAnon, anti-Semitic conspiracies*, NBC NEWS, Aug. 25, 2020, <https://www.nbcnews.com/politics/2020-election/rnc-cancels-speaker-mary-ann-mendoza-after-she-promoted-qanon-n1238109> (last visited Aug. 30, 2021).

³⁹ Michelle Malkin, TWITTER, Aug. 25, 2020, <https://twitter.com/michellemalkin/status/1298433969193549824> (last visited Aug. 30, 2021).

⁴⁰ Randall Chase, *Republican nominee for US Senate in Delaware has repeatedly promoted QAnon conspiracy theory, once called self ‘flat earther’*, CHICAGO TRIBUNE, Sep. 17, 2020, <https://www.chicagotribune.com/election-2020/ct-lauren-witzke-delaware-qanon-flat-earth-20200917-w6xeptfn65bqrj4tzv75oygnoa-story.html> (last visited Aug. 30, 2021).

⁴¹ Michelle Malkin, TWITTER, June 15, 2021, <https://mobile.twitter.com/michellemalkin/status/1404876766796124160> (last visited Aug. 30, 2021).

While OANN president Charles Herring claimed in a deposition for this case that he wasn't familiar with Ron Watkins' association with QAnon, nor did he know anything about Watkins' experience as a hacker (experience he did not have), it is clear that many of his employees knew precisely what QAnon was—and had either tacitly or openly supported it.

50. “In June 2021, OANN’s Pearson Sharp explained in a straight-to-camera monologue⁴² that tens of thousands of “radical Democrats . . . who tampered with the election” were traitors who should be “dealt with” via execution—a claim that echoes Q’s central mythology of “the storm.” The claim was shared by major QAnon promoting accounts, some with hundreds of thousands of followers. YouTube suspended OANN’s YouTube channel⁴³ for a week after the network promoted the same COVID-19 conspiracy theories popular among Q and its adherents.

51. “OANN also appeared⁴⁴ to offer Q-referencing emojis on its YouTube livestream, which were quickly taken down. Another of its hosts, Kristian Rouz, endorsed the conspiracy theory that the furniture site Wayfair was trafficking children, a theory embraced by QAnon acolytes, with Rouz calling QAnon “a widely accepted system of

⁴² Ewan Palmer, *OANN Presenter’s Calls for Mass Executions in U.S. Excites QAnon Supporters*, NEWSWEEK, June 24, 2021, <https://www.newsweek.com/qanon-executions-oann-presenter-traitors-election-1603678> (last visited Aug. 30, 2021).

⁴³ *YouTube suspends US news channel for Covid ‘cure’*, BBC NEWS, Nov. 25, 2020, <https://www.bbc.com/news/technology-55071344> (last visited Aug. 30, 2021).

⁴⁴ Rachel E. Greenspan, *Trump’s favorite news network appears to offer QAnon-themed emojis with a YouTube Live subscription*, INSIDER, Sep. 23, 2020, <https://www.insider.com/oan-qanon-themed-emojis-youtube-live-subscription-pro-trump-network-2020-9> (last visited Aug. 30, 2021).

beliefs.” And OANN correspondent Jenn Pellegrino appeared⁴⁵ on QAnon livestream Patriots Soapbox to claim that “a lot of people that I know, including people in our office, have mentioned” QAnon “quite a bit,” though she claimed that she herself did not know much about it.

Chanel Rion

52. “More than any other OANN personality, the network’s White House correspondent Chanel Rion has consistently boosted QAnon, its theories, and its promoters. While it is impossible to tell what Rion actually believes about Q, and what she shares simply because it has a large audience of committed viewers, her influence played a profound role in the Dominion Voting Systems conspiracy theory.

53. “In July 2020, Rion appeared⁴⁶ on Patriots Soapbox, a month after Pellegrino. Speaking live from the North Lawn of the White House, Rion was asked if she would ask then-Press Secretary Kayleigh McEnaney “the Q question.” Rion replied that “Q is Q anonymous for a reason, for a very good reason, and I think that people need to respect that and if, you know, that’s something that needs to be brought up by Q if he wants us—if they want to stay anonymous, they should stay anonymous, and if they want to reveal themselves, they should reveal themselves.” She then retweeted a Patriots Soapbox tweet promoting the appearance, which included the QAnon catchphrase “WWG1WGA.”

⁴⁵ Eric Hananoki, TWITTER, July 15, 2020, <https://twitter.com/ehananoki/status/1283459939890081793?s=20> (last visited Aug. 30, 2021).

⁴⁶ Eric Hananoki, *OAN’s White House correspondent: QAnon is anonymous ‘for a very good reason’ and ‘people need to respect that’*, MEDIA MATTERS, July 15, 2020, <https://www.mediamatters.org/one-america-news-network/oans-chanel-rion-made-pro-qanon-remarks-qanon-program> (last visited Aug. 30, 2021).

54. “That same month, Rion retweeted⁴⁷ a post from QAnon conspiracy theorist Michael Salla which claimed that former Trump national security adviser Michael Flynn taking the QAnon oath over the 4th of July means that “Flynn is telling us Q is the real deal and he is a supporter”—a charge that Flynn has consistently denied while simultaneously using QAnon catchphrases and fundraising off the movement.

55. “In October 2020, Rion’s promotion of Q was acknowledged by none other than Q themselves, who shared a tweet from Rion⁴⁸ which claimed without evidence that “Multiple @OANN reporters have now viewed the emails, photos, and videos on the #HunterBiden hard drive” which contained “several images of a minor that justify immediate attention.” Q’s drop added to Rion’s tweet that the “FBI can no longer attempt to shelter [protect] the Biden’s? [sic] Public awareness kills all protections.” That tweet then got her thousands of positive replies from Q believers. A few weeks later, after Biden had won the election, the circle was completed when Rion spoke to Watkins, in an interview that sent the allegations about Dominion and Dr. Coomer straight to Donald Trump.

56. “It is not clear at this point how exactly Rion found Watkins. Under oath for this case, Rion claimed that she came upon his Twitter account “commenting heavily on the Dominion Voting Systems user manual” in ways that were undiscovered by anyone else. She testified that her vetting of Watkins primarily consisted of “looking at his own verifiable background, [where] I could see that he was an administrator for 8chan, which

⁴⁷ <https://www.mediamatters.org/media/3883556> (last visited Sep. 13, 2021, 2021).

⁴⁸ <https://qposts.online/post/4917> (last visited Aug. 30, 201).

is an anonymous messaging board [. . .] famed for being [allowing users] to be anonymous.” While 8chan (which Watkins didn’t design) and its successor board 8kun do offer anonymity, Rion did not appear to know that they also notoriously easy to hack, with the “tripcode” system that Ron designed to verify accounts breached so frequently that the Q poster had to routinely change their password. Later in her deposition, Rion admitted she had “never been on an 8chan board.”

57. “Shortly after the election,⁴⁹ Watkins tweeted that because he had thoroughly studied the Dominion machine’s manual, he knew technical details about its “vulnerabilities” and how they could be exploited to change or delete votes. He tweeted technical sounding information about algorithms and security keys and source codes. And Watkins offered what he’d learned to Trump-world, personally mentioning on the 11th that he “reached out” to Rudy Giuliani to give him a “15-minute phone briefing.”

58. “But even before stumbling on Ron Watkins, Rion was already sharing election fraud conspiracy theories, getting over 8,000 retweets for her November 9, 2020 claim⁵⁰ that “just like Volkswagen would NEVER manipulate software code to FAKE low diesel emissions, Dominion would NEVER upload a last minute software code to voting machines to FAKE low Trump votes.”

59. “With Ron’s claims about Dominion’s massive fraud going viral, Rion contacted Watkins privately on November 11. Later that evening, Ron tweeted

⁴⁹ Ben Collins, *QAnon’s Dominion voter fraud conspiracy theory reaches the president*, NBC NEWS, Nov. 13, 2020, <https://www.nbcnews.com/tech/tech-news/q-fades-qanon-s-dominion-voter-fraud-conspiracy-theory-reaches-n1247780> (last visited Aug. 30, 2021).

⁵⁰ Chanel Rion, TWITTER, Nov. 9, 2020, <https://twitter.com/chanelrion/status/1325818841402912768?lang=en> (last visited Aug. 30, 2021).

“Ms. Chanel Rion just reached out to me and [I’ll] be talking with her about Dominion tomorrow.” The next day, Rion tweeted⁵¹ in response to Watkins, thanking him for his “valuable insights” and promising that “very interested parties” would learn a lot from what he told her. And around the same time that day, Trump tweeted⁵² Watkins “findings,” including that “Dominion’s systems deleted 2.7 million Trump votes nationwide” and that 221,000 votes in PA had been “switched” from Trump to Biden. None of this was true, or even possible.

60. “Despite having publicly praised his “valuable insights,” Rion initially denied that her interview with Watkins had informed her reporting—she replied “none” in⁵³ an email to NBC News when asked what influence Ron had on her story. And in her deposition for this case, she claimed Watkins was one of several “experts” she used for the story, with the others being protected sources she wouldn’t name.

61. “On the 14th, Watkins shared a clip from Rion’s “sneak preview” that had been posted by M2Madness, another major QAnon promoter, while claiming that it was only “10% of what he talked to Rion” about, with the other 90% being “of direct interest” to the Trump campaign. Days later, on the 17th, Rion previewed her “special report”⁵⁴ with OANN host Dan Ball, claiming “today we ask the question of just how easy is it to

⁵¹ Chanel Rion, TWITTER, Nov. 12, 2020, <https://twitter.com/ChanelRion/status/1327116053911138304> (last visited Aug. 30, 2021).

⁵² Matt Binder, *Trump adds fuel to infamous QAnon promoter’s debunked election fraud conspiracy*, MASHABLE, Nov. 19, 2020, <https://mashable.com/article/trump-election-fraud-ron-watkins-8kun> (last visited Aug. 30, 2021).

⁵³ Ben Collins, *QAnon’s Dominion voter fraud conspiracy theory reaches the president*, NBC NEWS, Nov. 13, 2020, <https://www.nbcnews.com/tech/tech-news/q-fades-qanon-s-dominion-voter-fraud-conspiracy-theory-reaches-n1247780> (last visited Aug. 30, 2021).

⁵⁴ <https://www.mediamatters.org/media/3913881> (last visited Aug. 30, 2021).

delete, swap, copy, and paste ballots at the machine level? So, we found an individual. He's a large-systems data analyst. His name is Ron Watkins. He has been pouring over the user manuals for Dominion systems for the past week and a half. And he's an experienced white hat hacker -- that is a good guy hacker. And he knows -- he's been reading this manual with that mindset."

62. "The piece, "Dominion-izing the Vote," finally aired on November 21, 2020. Rion heavily inflated Watkins' non-existent expertise, but completely ignored Watkins' ties to Skun or QAnon, never mentioning either. The same day the report aired, it was shared by Trump on Twitter, with the president using the "Dominion-izing the Vote" title in four separate retweets.⁵⁵ Watkins also heavily promoted the special on Twitter, and thanked Trump for retweeting it because he had apparently missed it the first time it aired on the network.

63. "Rion boosting Ron Watkins' claims about Dominion at the same time as Malkin and others were boosting Joe Oltmann's claim about Dr. Coomer and the "antifa conference call" proved to be a powerful combination. Ron was as public a face as QAnon had. And even if the right-wing pundits spreading conspiracy theories about Dominion did not reference Q, they didn't have to. Their theories were laundered by Ron and other major QAnon promoters to a massive following of diehard Q acolytes who were primed for the election to be stolen thanks to a year of drops made by Q (again, likely Ron Watkins.) Essentially, Watkins likely made the claims anonymously as Q, then pumped

⁵⁵ <https://www.thetrumparchive.com/?searchbox=%22chanelrion%22> (last visited Aug. 30, 2021).

them out to a massive audience under his own name—an audience that included almost every defendant in this case, and President Donald Trump.

64. “Despite all these links—the references to Q “staying anonymous for a reason,” appearing on Patriots Soapbox, being “Q’d” in a drop herself, and basing a potentially career-changing report on the testimony of the figure most likely responsible for Q, Rion claimed under oath merely that she “knew of” QAnon. She swore she knew nothing about 8chan, did not know where drops were made, and had little knowledge of either the movement or the people behind it—least of all Ron Watkins.

Sidney Powell

65. “Like many other “stolen election” conspiracy theorists in Trump’s orbit, attorney Sidney Powell has embraced QAnon while simultaneously claiming she has no idea what it is. In her first press conference with Rudy Giuliani, Powell declared⁵⁶ in QAnon-baiting language that “we are not going to back down. We are going to clean this mess up now. President Trump won by a landslide. We are going to prove it, and we are going to reclaim the United States of America for the people who vote for freedom.”

66. “Just days before Trump retweeted Chanel Rion’s “Dominion-izing the Vote” special, Powell vowed she would “release the Kraken”⁵⁷ and expose the fraud perpetrated against Trump with a series of suits that would culminate in the Supreme Court throwing out Biden’s fraudulent win. Instead, it was those suits that would all be

⁵⁶ Josh Gerstein, *Trump ‘Kraken’ lawyer Sidney Powell lands in Washington*, POLITICO, (Aug. 31, 2021) <https://www.politico.com/news/2021/08/31/trump-kraken-sidney-powell-washington-507879> (last visited Sep. 13, 2021).

⁵⁷ Davey Alba, *‘Release the Kraken,’ a catchphrase for unfounded conspiracy theory, trends on Twitter.*, NEW YORK TIMES, Nov. 17, 2020, <https://www.nytimes.com/2020/11/17/technology/release-the-kraken-a-catchphrase-for-unfounded-conspiracy-theory-trends-on-twitter.html> (last visited Aug. 30, 2021).

thrown out, after being found to be riddled with errors and reliant on shadowy figures and conspiracy theories as evidence.

67. “In her “Kraken” lawsuit, she cited Ron Watkins as an authority on voting machines, based at least in part on Chanel Rion’s reporting, by including an eight page affidavit from Watkins,⁵⁸ consisting mostly of citations of the voting machine’s manual, where Watkins claimed that “the Dominion Democracy Suite may enable voter fraud” by either crooked or incompetent election officials. None of this was true, and all of it was completely outside of Watkins’ expertise.

68. “This was not the only time a QAnon promoter was mentioned in one of her lawsuits—in “the Kraken” suit, Powell cited⁵⁹ QAnon guru and pro-Trump podcaster Terpsichore Maras-Lindeman as an “intelligence contractor” with firsthand knowledge that foreign interests had the power to change American electoral votes. Maras-Lindeman, who runs the pro-Q Telegram channel Tore Says, has claimed to be a “cryptolinguist” with extensive foreign intelligence service, along with numerous military honors, and the (unevidenced) ability to time travel.

69. “However, Powell merely lifted a 2019 blog post that Maras-Lindeman, who had actually served in the Navy for just eight months, wrote to bolster her own conspiracy theories. Maras-Lindeman, in turn, has taken the fame she received from being

⁵⁸ Arya Hodjat, *Former Trump Lawyer Sidney Powell Cites QAnon Promoter in Voter Fraud Lawsuit*, THE DAILY BEAST, Dec. 1, 2020, <https://www.thedailybeast.com/former-trump-lawyer-sidney-powell-cites-qanon-backer-ron-watkins-in-voter-fraud-lawsuit-affidavit> (last visited Aug. 30, 2021).

⁵⁹ Jon Swaine, *Sidney Powell’s secret intelligence contractor witness is a pro-Trump podcaster*, WASHINGTON POST, Dec. 24, 2020, https://www.washingtonpost.com/investigations/sidney-powells-secret-intelligence-contractor-witness-is-a-pro-trump-podcaster/2020/12/24/d5a1ab9e-4403-11eb-a277-49a6d1f9dff1_story.html (last visited Aug. 30, 2021).

mentioned in “the kraken” to grift tens of thousands of dollars⁶⁰ from followers to file her own election fraud lawsuits—all of which have been thrown out.

70. “In the same suit, Powell also submitted a statement⁶¹ from an anonymous Twitter account called Quisling_Hunter, a QAnon supporter⁶² who went to a warehouse owned by the Georgia Secretary of State in the middle of the night on November 30, 2020, to dig through dumpsters and surveil employees based on a call to action by Ron Watkins to personally observe election officials. Quisling_Hunter found nothing⁶³ other than a scenario he deemed “very very suspicious,” while admitting anything he learned about what might be happening the warehouse was “second hand.”

71. “In the guise of her work as Michael Flynn’s lawyer (himself a major figure in the QAnon world), Powell spread conspiracy theories⁶⁴ about the deep state, George Soros, and the Federal Reserve—all constant targets of QAnon. She appeared on the “Patriot’s Soapbox” QAnon YouTube show, and has retweeted major QAnon promoters. Powell has used QAnon catchphrases in her tweets, including making references to “The

⁶⁰ David Gilbert, *QAnon Has a Disturbing Takeover Plot to ‘Eliminate’ Elected Officials*, VICE, June 2, 2021, <https://www.vice.com/en/article/dyv3da/qanon-has-a-disturbing-takeover-plot-to-eliminate-elected-officials> (last visited Aug. 30, 2021).

⁶¹ Alex Kaplan, *QAnon grifters Jim and Ron Watkins now turn to voter fraud conspiracy theories, and Trumpworld is taking notice*, MEDIA MATTERS, Jan. 5, 2021, <https://www.mediamatters.org/voter-fraud-and-suppression/qanon-grifters-jim-and-ron-watkins-now-turn-voter-fraud-conspiracy> (last visited Aug. 30, 2021).

⁶² Travis View, *Trump Finally Gave QAnon What It Always Wanted: Respect*, NEW YORK MAGAZINE, December 29, 2020, <https://nymag.com/intelligencer/2020/12/trump-gave-qanon-what-it-always-wanted-respect.html> (last visited September 3, 2021).

⁶³ Akiva Cohen, TWITTER, Dec. 4, 2020, <https://twitter.com/AkivaMCohen/status/1334933705262030848?s=20> (last visited Aug. 30, 2021).

⁶⁴ Matt Gertz, *Sidney Powell, Michael Flynn’s new attorney, is an anti-Mueller conspiracy theorist and Fox regular*, MEDIA MATTERS, June 13, 2019, <https://www.mediamatters.org/fox-news/sidney-powell-michael-flynn-new-attorney-anti-mueller-conspiracy-theorist-and-fox-regular> (last visited Aug. 30, 2021).

Storm.” And she has spoken at numerous QAnon-related events, including a “Stop the Steal” rally⁶⁵ in December in Georgia featuring another election conspiracy theorist and QAnon believer, the attorney Lin Wood.

72. “Like many other prominent figures in QAnon, Powell was doing all of this while denying that she had anything to do with Q or even knew what it was, telling Politico in an email⁶⁶ “I don’t know anything about Q Anon [sic], or Q. I couldn’t tell you what that was.”

Rudy Giuliani

73. “Former New York City mayor turned Trump lawyer Rudy Giuliani has not publicly endorsed QAnon. But he is directly linked⁶⁷ to the election fraud conspiracy theories that Sidney Powell pushed through QAnon promoters and news channels. Despite Giuliani having fired Powell from Trump’s formal legal team, the two became among the most prolific spokespeople for the idea that Biden used Dominion and Eric Coomer to steal the election. Powell and Giuliani appeared⁶⁸ on Fox News, OANN, Newsmax, “The Rush Limbaugh Show,” Steve Bannon’s “War Room” podcast, and a slew

⁶⁵ Ewan Palmer, *Sidney Powell’s Ties to QAnon Movement Explained*, NEWSWEEK, Dec. 3, 2020, <https://www.newsweek.com/sidney-powell-qanon-voter-fraud-lawsuits-georgia-1552050> (last visited Aug. 30, 2021).

⁶⁶ Keith Kloor, *The #MAGA Lawyer Behind Michael Flynn’s Scorched-Earth Legal Strategy*, POLITICO MAGAZINE, Jan. 17, 2020, <https://www.politico.com/news/magazine/2020/01/17/maga-lawyer-behind-michael-flynn-legal-strategy-098712> (last visited Aug. 30, 2021).

⁶⁷ Katelyn Polantz and Dan Berman, *Giuliani and Powell pushed election fraud so they could hobnob in DC, Dominion Voting Systems argues in court*, CNN, June 24, 2021, <https://www.cnn.com/2021/06/24/politics/rudy-giuliani-sidney-powell-dominion-lawsuit/index.html> (last visited Aug. 30, 2021).

⁶⁸ Roger Parloff, *The wild ride that made Rudy Giuliani, ‘Kraken’ lawyer Sidney Powell, and Fox News targets in the mother of all defamation cases*, YAHOO!, Mar. 9, 2021, <https://www.yahoo.com/now/rudy-giuliani-sidney-powell-fox-news-sued-by-dominion-smartmatic-102628439.html> (last visited Aug. 30, 2021).

of far-right blogs and news outlets to peddle the same claims being repeated over and over by QAnon promoters and believers.

74. “And Giuliani took photos⁶⁹ with both Chanel Rion and the “Q Shaman” Jake Angeli, at a “stop the steal” “news conference” in Arizona in late November. Angeli later donned his “Q Shaman” costume to take part in the Capitol insurrection, and is currently in prison for his involvement. While this isn’t proof of a connection between any of the parties, it’s proof that they ran in the same circles and often promoted the same conspiracy theories. And before Rion took up the case, it was Giuliani who was tagged on Twitter⁷⁰ by Ron Watkins with his offer of a “15-minute phone briefing” on how to “uncover end-user fraud within the Dominion voting system.” It’s not clear if such a “briefing” ever took place.

Jim Hoft/Gateway Pundit

75. “Hoft and Gateway Pundit have a complicated relationship with QAnon, writing stories that have both held the theory up as a font of secret knowledge, and attempting to debunk it as some sort of anti-conservative disinformation operation, sometimes shifting sentence by sentence. Hoft will often use Gateway Pundit to excoriate US law enforcement for taking QAnon and its associated violence seriously, while “ignoring” the acts of conservative bogeymen like the Black Lives Matter movement, and “antifa.”

⁶⁹ Dan Evon and Dan MacGuill, *Was Giuliani Photographed with Capitol Rioter Jake Angeli?*, SNOPEs, Jan. 9, 2021, <https://www.snopes.com/fact-check/giuliani-jake-angeli-capitol-riot/> (last visited Aug. 30, 2021).

⁷⁰ <https://web.archive.org/web/20201112204152/twitter.com/codemonkeyz> (last visited Aug. 30, 2021).

76. “One pro-Q story from April 2021 attacks Newsweek for printing an interview with the senior director of the Counter Extremism Project talking about how ISIS and QAnon use similar propaganda videos and cultic techniques to radicalize new converts. “QAnon is behind ZERO murders. Not one,” writes Hoft,⁷¹ (this claim itself is false) “The internet movement was popular during the Trump years and speculated about how the Deep State and coup plotters were going to be arrested and face justice.” He then adds “None of that ever happened,” seemingly criticizing the movement he just extolled. Other Gateway Pundit articles on QAnon have been just as contradictory. One, from August 2020, praised the information revealed by the “drops” while simultaneously claiming⁷² the movement has been infiltrated by Russian intelligence figures who “inserted” antisemitism into it – a claim with no merit. In another, Hoft’s site falsely took credit⁷³ for revealing the identity of the creator of the hugely influential Q drop aggregator website QMap – while also praising the drops as “authentic and of high quality.”

⁷¹ Jim Hoft, *DISGUSTING FAKE NEWS: Newsweek Compares QAnon, Who Never Killed Anyone - To ISIS, Who Murdered Over 18,800 in Iraq Alone*, THE GATEWAY PUNDIT, Apr. 9, 2021, <https://www.thegatewaypundit.com/2021/04/disgusting-fake-news-newsweek-compares-qanon-never-killed-anyone-isis-murdered-18800-iraq-alone/> (last visited Aug. 30, 2021).

⁷² Joe Hoft, *Despite Our Evidence Showing the QAnon Movement Is Being Infiltrated by Russian Operatives – Leftist Reporter Clings to Antisemitic Infiltration to Hurt Movement*, THE GATEWAY PUNDIT, Aug. 12, 2021, <https://www.thegatewaypundit.com/2020/08/despite-evidence-showing-qanon-movement-infiltrated-russian-operatives-leftist-reporter-clings-antisemitic-infiltration-hurt-movement/> (last visited Aug. 30, 2021).

⁷³ Joe Hoft, *QAnon Webmaster Doxxed This Week Was First Identified By The Gateway Pundit Contributor in June*, THE GATEWAY PUNDIT, Sep. 13, 2020, <https://www.thegatewaypundit.com/2020/09/qanon-webmaster-doxxed-week-first-identified-gateway-pundit-contributor-june/> (last visited Aug. 30, 2021).

77. “And the same day as Joe Biden’s inauguration, Hoft ran an extremely confusing article⁷⁴ touting a 1984 book by a Soviet defector as a “blueprint for what the deep state has planned for QAnon,” and mentioning the FBI’s report labeling the movement as a domestic terror threat as proof that the liberal intelligence establishment feared Q—while also claiming that QAnon *itself* was a plan to “subdue millions of Trump voters as the deep state ran a number of coup attempts against President Trump.”

Eric Metaxas

78. “The Christian conservative radio host and author has claimed “out of state ballots”⁷⁵ were counted for Biden in Michigan, called anyone who believed Biden actually won “enemies of this country,”⁷⁶ and said the election theoretically being stolen was “a thousand times worse”⁷⁷ than rape or murder.

79. “Metaxas has little public link to QAnon and does not appear to have mentioned it publicly, but he has appeared with a number of stolen election believers with links to QAnon. Defendants in this case who have appeared on Metaxas’ show include

⁷⁴ Jim Hoft, *Soviets Used ‘Operation Trust’ to Identify, Arrest and Persecute Anti-Communists – Is That What the Deep State Has Planned for Q-Anon?*, THE GATEWAY PUNDIT, Jan. 20, 2021, <https://www.thegatewaypundit.com/2021/01/soviets-used-operation-trust-identify-arrest-persecute-anti-communists-deep-state-planned-q-anon/> (last visited Aug. 30, 2021).

⁷⁵ Eric Metaxas, TWITTER, Nov. 9, 2020, <https://twitter.com/ericmetaxas/status/1326001525949407232?lang=en> (last visited Aug. 30, 2021).

⁷⁶ Jason Lemon, *Pro-Trump Author Eric Metaxas Calls Deniers of 2020 Election Fraud Claims ‘Enemies of This Country’*, NEWSWEEK, Apr. 18, 2021, <https://www.newsweek.com/pro-trump-author-eric-metaxas-calls-deniers-2020-election-fraud-enemies-this-country-1584527> (last visited Aug. 30, 2021).

⁷⁷ Rod Dreher, *Eric Metaxas’s American Apocalypse*, THE AMERICAN CONSERVATIVE, Dec. 10, 2020, <https://www.newsweek.com/pro-trump-author-eric-metaxas-calls-deniers-2020-election-fraud-enemies-this-country-1584527> (last visited Aug. 30, 2021).

Sidney Powell⁷⁸ and Michelle Malkin,⁷⁹ along with other QAnon luminaries like Roger Stone,⁸⁰ Obama birth certificate truther Jerome Corsi,⁸¹ and Trump photographer turned Q evangelist Gene Ho⁸²—a Q promoter who is running for mayor in Myrtle Beach, SC.

80. “Metaxas has also endorsed QAnon theories through his praise of Michael Flynn. On the December 3 edition of his show,⁸³ Metaxas said that “if Trump gets his second term” (a statement made a month after Trump had lost the election) he should appoint Flynn and Sidney Powell to take “top jobs” in his government as they fight “the Second American Revolution.” Metaxas also hosted an event⁸⁴ in Washington, D.C. in December called the “Jericho March,” where as a featured speaker, Flynn declared “I have people ask me, on a scale of one to 10, who’s going to be the next president? I say, Donald Trump, a 10.”⁸⁵

⁷⁸ <https://metaxassuper.com/radio-show/show-guest-list/?gs=sidney-powell&gn=Sidney%20Powell> (last visited Aug. 30, 2021).

⁷⁹ <https://metaxassuper.com/radio-show/show-guest-list/?gs=michelle-malkin&gn=Michelle%20Malkin> (last visited Aug. 30, 2021).

⁸⁰ Jacob Silverman, *Is This Q?*, CRITICAL MASS, Mar. 23, 2021, <https://newrepublic.com/article/161775/q-qanon-hbo-ron-watkins> (last visited Aug. 30, 2021).

⁸¹ Jane Coaston and Andrew Prokop, *Jerome Corsi, the conspiracy theorist now entangled in the Mueller investigation, explained*, VOX, Nov. 28, 2018, <https://www.vox.com/policy-and-politics/2018/11/28/18112717/jerome-corsi-mueller-roger-stone-donald-trump-wikileaks> (last visited Aug. 30, 2021).

⁸² Claire Goforth, *How South Carolina became a troubling new hub for QAnon*, DAILY DOT, June 9, 2021, <https://www.dailydot.com/debug/south-carolina-qanon/> (last visited Aug. 30, 2021).

⁸³ Media Matters Staff, *Right-wing radio host Eric Metaxas urges Trump to appoint Michael Flynn and Sidney Powell to top government position*, MEDIA MATTERS, (Dec. 3, 2020), <https://www.mediamatters.org/sidney-powell/right-wing-radio-host-eric-metaxas-urges-trump-appoint-michael-flynn-and-sidney> (last visited Sep. 13, 2021).

⁸⁴ David French, *The Dangerous Idolatry of Christian Trumpism*, THE DISPATCH, (Dec. 13, 2020), <https://frenchpress.thedispatch.com/p/the-dangerous-idolatry-of-christian> (last visited Sep. 13, 2021).

⁸⁵ Jillian Cheney, *Trump-Supporting ‘Jericho March’ Ends In Protest, Burning of BLM Banners*, RELIGION UNPLUGGED, (Dec. 14, 2020), <https://religionunplugged.com/news/2020/12/13/trump-supporting-jericho-march-ends-in-protest> (last visited Sep. 13, 2021).

The Danger of QAnon beyond Joe Biden’s Inauguration

81. “At the moment Joe Biden took office as the 46th President, the central prophecy of QAnon, that Donald Trump would unleash mass arrests in the form of “The Storm” finally failed. But QAnon believers, who by now likely numbered in the millions, were undaunted and instantly pivoted from “arrests are coming soon” to “fraud will be revealed soon,” including the QAnon-promoting defendants in this case. How that fraud will be revealed, and what will happen once it is, remains unknown—but what is known to these people is that the fraud is real, and will be revealed at some ever-changing point in the future.

82. “OAN continues to publish story after story purporting to reveal massive “election fraud,”⁸⁶ publishing an un-bylined story⁸⁷ about a poll from Arizona that claims “most of the state’s Republican voters believe the ongoing audit will reveal President Trump was the winner in November,” and insinuating that massive electronic switching of votes in Georgia⁸⁸ threw that state to Joe Biden. Chanel Rion has also continued to push the theory that Donald Trump is the rightful president, even as she covers Joe Biden’s administration. Most recently, Rion personally fundraised⁸⁹ for the Maricopa

⁸⁶ One America News Network, <https://www.oann.com/tag/election-fraud/> (last visited Aug. 30, 2021).

⁸⁷ OAN Newsroom, *Turley: Left Wing Reaction To Audit Points To Likely Trump Vindication*, OAN, July 20, 2021, <https://www.oann.com/turley-left-wing-reaction-to-audit-points-to-likely-trump-vindication/> (last visited Aug. 30, 2021).

⁸⁸ Angelo Fichera and Saranac Hale Spencer, *OAN Report Features Baseless Assertion of Election Fraud by Algorithm*, FACTCHECK.ORG, Feb. 11, 2021, <https://www.factcheck.org/2021/02/oan-report-features-baseless-assertion-of-election-fraud-by-algorithm/> (last visited Aug. 30, 2021).

⁸⁹ Sarah Mimms, *Pro-Trump OAN Reporters Are Blatantly Raising Money For A Bogus Election “Audit” In Arizona*, BUZZFEED NEWS, May 18, 2021, <https://www.buzzfeednews.com/article/sarahmimms/arizona-election-results-oan-reporters-fundraising> (last visited Aug. 30, 2021).

County “forensic audit” seen by many QAnon believers as the “first domino” that will topple over and eliminate the votes of fraudulent Electoral College slates—admitting under oath that she is the “marketing director” for a fundraising group for the audit called “Voices and Votes.” She even tweeted on June 18⁹⁰ that “the domino is about to tip”—a clear reference to these conspiracy theories.

83. “Likewise, the other Defendants in the case continue to push stolen election conspiracy theories, often clearly using QAnon language to do so. Giuliani was recently stripped⁹¹ of his New York state law license for his spreading of theories that Trump actually won the 2020 election. Metaxas claimed⁹² on his show the day of the January 6, 2021 Congressional hearings that “there was no insurrection.” And Powell spoke at the recent QAnon/ “health freedom” event in Dallas,⁹³ where she repeated a completely fact-free claim from Trump boosting personality Mike Lindell, who has told a massive fan base that Trump would be “reinstated” as president that August.⁹⁴ “It’s going to have to be dealt with it,” Powell said,⁹⁵ referring to the “fraud” she had spent months trying to

⁹⁰ Chanel Rion, Twitter, June 18, 2021, <https://twitter.com/ChanelRion/status/1405946343978328073?s=20> (last visited Aug. 30, 2021).

⁹¹ Eugene Kiely and Robert Farley, *Rudy Giuliani’s Bogus Election Fraud Claims*, FACTCHECK.ORG, June 24, 2021, <https://www.factcheck.org/2021/06/rudy-giulianis-bogus-election-fraud-claims/> (last visited Aug. 30, 2021).

⁹² Right Wing Watch, TWITTER, July 27, 2021, <https://twitter.com/RightWingWatch/status/1420078340673769473?s=20> (last visited Aug. 30, 2021).

⁹³ Eliza Relman, *Ex-Trump lawyer Sidney Powell showed up to a QAnon conference in a biker vest and falsely claimed Trump could be ‘reinstated’ as president*, YAHOO!, May 31, 2021, <https://sports.yahoo.com/ex-trump-lawyer-sidney-powell-212750195.html> (last visited Aug. 30, 2021).

⁹⁴ McKenzie Sadeghi, *Fact check: False claim persists online that Trump will be reinstated as president in August*, USA TODAY, July 23, 2021, <https://www.usatoday.com/story/news/factcheck/2021/07/23/fact-check-trump-not-reinstated-president-august/8060880002/> (last visited Aug. 30, 2021).

⁹⁵ Rosalind S. Helderman, et. al., *Inside the ‘shadow reality world’ promoting the lie that the presidential election was stolen*, WASHINGTON POST, June 24, 2021,

prove had taken place. “It should be that he can simply be reinstated, that a new inauguration date is set and Biden is told to move out of the White House.” Since Lindell first made the claim, QAnon believers have been repeating it for months, often linked to the fraudulent “forensic audit” taking place in Maricopa County, without realizing that US law does not allow for former presidents to return to office without winning an election.

84. “All of these claims are indistinguishable from the rhetoric still being used by major QAnon promoters on social media, where influencers with six figure followings use Q concepts as “proof” that wounded Capitol Police officers faked their injuries, that the insurrection was infiltrated by the FBI and antifa, and that Trump is the real winner of the election. And Ron Watkins continues to make posts on Telegram that sound exactly like Q drops, including continuing to reference Dominion Voting Systems. No matter what it calls itself now, the QAnon movement remains a dangerous and prolific conspiracy cult with profound ties to Dr. Coomer’s ordeal and the people who put him through it.

85. “It is, therefore, my conclusion as an expert in the QAnon conspiracy that the allegations that Dr. Coomer played a significant role in election fraud are not credible. They are the product of a conspiracy theory built around the fraudulent message board “drops” of a fake “military intelligence team” called Q, which pushed a preconceived notion that election fraud would be committed against Trump. Those who believed these fake posts were actually part of a real intelligence operation then worked backwards to

<https://www.washingtonpost.com/politics/2021/06/24/inside-shadow-reality-world-promoting-lie-that-presidential-election-was-stolen/> (last visited Aug. 30, 2021).

validate their election fraud theories, using the Q “drops” as “evidence” of crimes that have never been proven to have taken place.

86. “It is also my opinion as an expert on QAnon that Ron Watkins, who likely wrote the bulk of these fake intelligence posts, is an unreliable source on voter fraud and voting machine technology. Because of his lack of knowledge or experience, the defendants who relied on Watkins as an expert, such as Chanel Rion and Joe Oltmann, are just as unreliable when speaking about the fraud that Dominion or Dr. Coomer could have perpetrated. The narrative pushed by QAnon promoters about Dr. Coomer is consistent with other debunked conspiracy theories about antifa, the 2020 election in general, and a powerful cabal pulling the strings to ensure Donald Trump’s defeat. All are based on unevidenced theories propagated by unreliable sources.

87. “Pursuant to C.R.S. § 13-27-101, et. seq., I declare under penalty of perjury under the law of Colorado that the foregoing is true and correct.”

Further Declarant sayeth naught.

Executed on the 14th day of September 2021 in Altadena, California.



Mike Rothschild, Declarant