

DATE FILED: October 4, 2021 10:59 AM
FILING ID: F36734B217228
CASE NUMBER: 2020CV34319

EXHIBIT 602

<p>DISTRICT COURT, DENVER COUNTY, COLORADO Court Address: 1437 Bannock Street RM 256 Denver, CO 80202</p>	
<p>ERIC COOMER, <i>Plaintiff,</i></p> <p>vs.</p> <p>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., <i>Defendants.</i></p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>John C. Burns, #21PHV6433 BURNS LAW FIRM P.O. Box 191250 Saint Louis, MO 63119 Telephone: 314-329-5040 Facsimile: 314-282-8136 E-mail: tblf@pm.me</p> <p>Randy B. Corporon, Esq. Dane E. Torbenson, Esq. Kevin J. Farrell, Esq. Brian E. Lewis, Esq. Joanna T. Floribus, Esq. Law Offices of Randy B. Corporon, P.C. 2821 S. Parker Rd., Suite 555 Aurora, CO 80014</p> <p><i>Attorneys for Defendants James Hoft and TGP Communications d/b/a The Gateway Pundit</i></p>	<p>Case No. 2020CV34319 Div. 409</p>
<p style="text-align: center;">AFFIDAVIT OF JAMES HOFT IN HIS CAPACITY AS PRESIDENT OF TGP COMMUNICATIONS, LLC, AS WELL AS HIS PERSONAL CAPACITY, IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS</p>	

I, James Hoft, for myself and TGP Communications, LLC d/b/a The Gateway Pundit (TGP) (Defendants, collectively) declare and state as follows:

1. I am the Editor-in-Chief and Publisher of the The Gateway Pundit, an political news and opinion internet blog located at <http://www.thegatewaypundit.com>.

2. I submit this affidavit in support of Defendants' Motion to Dismiss. I have personal knowledge of the following facts and, if called and sworn as a witness, could and would testify to them.

3. Leading up to the 2020 election (Election), as part of my research and journalism and that of colleagues, I became aware of numerous concerns regarding the upcoming Election, including but not limited to absentee ballots and cyber hacking.

4. In the aftermath of the Election, because of irregularities that both I and many in the public perceived, I decided to launch an investigation. I dispatched and directed journalists in Michigan, Georgia, and Arizona. The purpose of these investigations was to document evidence – or a lack thereof – of Election irregularities and fraud.

5. As part of these journalistic investigations, our journalists filed dozens of FOIA requests costing many thousands of dollars, conduct eye-witness video interviews, interview election officials, and review evidence – including hundreds of affidavits from all over the country.

6. During this period and continuing through the present, I have given dozens of interviews about Election irregularities, wrote a report on the subject, and even was invited to a university to provide a guest lecture. I have published hundreds, if not thousands of articles written by myself and others on the subject of Election irregularities and voter fraud.

7. Our investigations into Election irregularities has made us a target of malicious lawfare, and public/private partnerships to censor my voice and the voice of Gateway Pundit.

8. For example, after my team and I reviewed hundreds of hours of security camera footage, we were able to prove that an illegal 3:30 a.m. ballot dump occurred in Detroit. This was significant, because although we had video-interviewed multiple witnesses who confirmed that approximately 50-60,000 ballots were illegally transported to the TCF Center to be counted illegally, almost all mainstream press attempted to censor or “debunk” the witnesses. Within approximately two days of publishing the video footage proof, and posting it to Twitter, my account – which also functioned as the Twitter account for Gateway Pundit, was permanently suspended. Gateway Pundit is regularly targeted by public-private partnerships who attempt to interfere with our business relationships, deplatform us, censor us, and who generally seek to destroy our business to silence us.

9. I first became aware of Joe Oltmann after he made public allegations about infiltrating an ANTIFA cell. It is my understanding based on conversations with him and media reports that he is a successful businessman who works and lives in the Denver area.

10. On or about November 16, 2020, I interviewed Joe Oltmann and recorded the audio. During the interview, I found Mr. Oltmann to be a highly credible witness. At no point did I doubt his conviction in his experiences or his research. I had no reason to doubt them then, and I have no reason to doubt them now.

11. Given the subject matter of his interview and research, his statements to me that he and his family were placed in danger by his decision to public with his experiences and research, seemed very credible.

12. The fact that he was willing to place himself, his family, and his business at risk also contributed to my assessment of his credibility.

13. The interview I conducted of Mr. Oltmann was the same as numerous interviews

I've given before, and I interviewed him just the same as I would any other person who purported to be a witness to Election irregularities.

14. I am not now, nor have I ever been aware of any credible evidence disproving Mr. Oltmann's statements, other than denials made by Dominion, Mr. Coomer and media personalities.

15. I know my statements at issue in this case are true now, and I knew them to be true at the time I published them.

16. As part of Gateway Pundit's investigation into Election irregularities, I have interviewed multiple forensic, mathematical, and other technology experts about the likelihood that either the electronic voting systems or Dominion's voting systems were compromised during the Election. All of these experts provide credible evidence that the Election results were disrupted.

17. I wrote the statements at issue in this suit after conducting research, including arguments and counterarguments from government officials and news outlets.

18. I continue to investigate the Election currently, and will for the foreseeable future.

19. I interviewed Mr. Oltmann the same as many others on the topic of the Election, and I presented all of the factual basis for my statements when I made them.

20. I was unable to interview Mr. Coomer because I was unable to locate him.

Further, affiant sayeth not.

Dated: April 30, 2021