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DISTRICT COURT, COUNTY OF DENVER,  
STATE OF COLORADO

**EXHIBIT**  
**A**

Court Address:  
1437 Bannock Street  
Denver, CO 80202

DATE FILED: October 4, 2021 11:00 AM  
FILING ID: 8063AD6C39A4A  
CASE NUMBER: 2020CV34319

^ COURT USE ONLY ^

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ERIC COOMER, Ph.D.,  
Plaintiff,

Case No. 20CV34319  
Courtroom 409

vs.

DONALD J. TRUMP FOR PRESIDENT, INC.,  
SIDNEY POWELL, SIDNEY POWELL, P.C.  
RUDOLPH GIULIANI, JOSEPH OLTMANN,  
FEC UNITED, SHUFFLING MADNESS  
MEDIA, INC., d/b/a CONSERVATIVE DAILY,  
JAMES HOFT, TGP COMMUNICATIONS LLC  
d/b/a THE GATEWAY PUNDIT, MICHELLE  
MALKIN, ERIC METAXAS, CHANEL RION,  
HERRING NETWORKS, INC.,  
d/b/a ONE AMERICA NEWS NETWORK,  
and NEWSMAX MEDIA, INC.,  
Defendants.

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VIDEO VIDEOCONFERENCED DEPOSITION OF THE AUTHORIZED  
REPRESENTATIVE OF FEC UNITED BY JOE OLTMANN  
September 9, 2021

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1 synagogue. And not allowing the government to come in  
 2 and take away spiritual food, which is as important as  
 3 the food you eat.

4 On the education side, getting kids back  
 5 to school and keeping masks off them. Following the  
 6 science, not the junk science or the propaganda that's  
 7 put in the left-wing media. And the weaponization of  
 8 technology and media in order to push down social  
 9 agendas, and to use our kids as political pawns, it  
 10 became another glaring issue on the education side. So  
 11 how we do get rid of critical race theory and gender  
 12 fluidity and all these other things that are destroying  
 13 our kids' minds when they can't even get math, science or  
 14 English right.

15 And the last of which is commerce. How do  
 16 we -- how do we protect small, medium businesses and  
 17 protect our community and give them the ability to have a  
 18 voice? Which they did not have at all. And, you know,  
 19 organizations like the Chamber of Commerce were anemic,  
 20 as the article in Time Magazine pointed out, they worked  
 21 against the better interests of the people and decided  
 22 for the people that they were the daddy and that they  
 23 were going to do everything they could to effect and  
 24 steer and secure the election the way they wanted it  
 25 steered.

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1 So the organization also has another part,  
 2 which is policy and politics, and that's getting people  
 3 involved in the community. So it's a four-prong approach  
 4 inside the organization.

5 (Telephone ringing.)

6 A. Sorry. I tried to turn off my stuff on my  
 7 computer. It's not my phone that's ringing; it's my  
 8 computer that's ringing, so I apologize.

9 But the policy and politics side, as an  
 10 organization, we want to give people a strong voice and,  
 11 you know, now we have a pretty large following across the  
 12 nation and we have a pretty solid member base that grows  
 13 every day.

14 And, you know, we're going to continue to  
 15 push forward an organization to, you know, take away the  
 16 authority of government to -- and these radical leftists  
 17 in destroying, eroding our basic -- our most basic  
 18 freedom in our country. So I started the organization  
 19 because of that, because there's not a lot of  
 20 organizations out there that do things boldly and stand  
 21 up against this -- what I believe is shameful  
 22 representation of selfishness and a thirst for power and  
 23 greed.

24 And so it's -- we've been very effective  
 25 in winning races and helping people get -- get to the

Page 11

1 place where they can restore things to the community.

2 Q. Okay. FEC United, then, has been around  
 3 for about a year and a half; is that right?

4 A. Well, so FEC United has been around in an  
 5 organic way since June, I think, of last year. And we  
 6 got our -- June -- we got our -- or July. We got our  
 7 acceptance as an organization in October of 2020.

8 Q. From the federal government?

9 A. From the IRS.

10 Q. Okay. And FEC United is a 501(c)(4),  
 11 right?

12 A. It is.

13 Q. What is the -- what's the structure of the  
 14 control of FEC United? Are there officers?

15 A. There are not.

16 Q. Okay. Now, Mr. Butler -- Stu Butler  
 17 appeared at the courthouse for a deposition as referenced  
 18 in the -- of the FEC, and he testified that he was the  
 19 temporary president?

20 A. Well, he's not the -- he's the pro tem  
 21 president. So he stepped into that position. There's  
 22 nothing temporary about it. It's a president pro tem.  
 23 So pro tem is I do this until someone is found in the  
 24 search to take over that role -- the roles and  
 25 responsibilities of the organization.

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1 Q. Who appointed Mr. Butler as president pro  
 2 tem?

3 A. The board did.

4 Q. Okay. Who is on the board?

5 A. Six people.

6 Q. All right. And who are they?

7 THE DEPONENT: Is that a question I have  
 8 to answer?

9 THE REPORTER: I'm sorry. I can't  
 10 understand you, Mr. Oltmann.

11 THE DEPONENT: I said hold one second.  
 12 I'll grab that information for you. 30 seconds.

13 A. Can we come back to that question just so  
 14 I'm not wasting any time?

15 Q. Yeah, that's fine.

16 Do you recall any names off the top of your  
 17 head?

18 A. Oh, yeah. So I know some of them. Henry  
 19 Allen.

20 Q. Okay. Anyone else?

21 A. I just changed the board, so...  
 22 Rayanne Weber.

23 Q. Okay. Anyone else?

24 A. I'm trying to find it while I'm --

25 Q. Are you a board member?

Page 13

1 A. I am.  
2 Q. Are you chairman of the board?  
3 A. I am.  
4 Q. Okay. How often does the board meet?  
5 A. Every quarter.  
6 Q. And is the board responsible for all the  
7 major decisions of FEC United?  
8 A. Yes.  
9 Q. Do you act -- do you make other decisions  
10 for FEC United -- say, decisions that wouldn't rise to the  
11 board level?  
12 A. Say that again.  
13 Q. Do you make other decisions for FEC United,  
14 say, for example, decisions that wouldn't rise to the  
15 level of a board decision?  
16 A. No. No, I don't -- I will advise Stu. I  
17 will advise them on what needs to be done, and they get  
18 to make a decision on whether or not they follow that  
19 path or not.  
20 Q. Does FEC United have any employees?  
21 A. It has one employee.  
22 Q. And that's Stephanie Wheeler?  
23 A. That is.  
24 Q. And what's her job?  
25 A. She's a communications -- she handles

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1 communications -- communications director.  
2 Q. Okay.  
3 A. We're an organization of volunteers. We  
4 have volunteers, community leaders, and things like that  
5 inside the community. It's a volunteer movement.  
6 Q. Other than Ms. Wheeler, is anyone paid by  
7 FEC United for their work with the organization?  
8 A. We have a contractor that does web work.  
9 But other than that, no.  
10 Q. Have you ever been paid by FEC United?  
11 A. No.  
12 Q. How many members does FEC United have?  
13 A. I don't know how many paid members we  
14 have, but we have about 200,000 people across the nation  
15 that have signed up to be members.  
16 Q. Now, you said "paid members." What do you  
17 mean by "paid member"?  
18 A. Well, people can pay \$60 a year to become  
19 a member of FEC United.  
20 Q. And with that membership, what is -- what  
21 does a paid member get?  
22 A. They get access to newsletters and --  
23 THE REPORTER: I'm sorry. News -- I'm  
24 sorry. Newsletters and?  
25 THE DEPONENT: Support.

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1 A. So if they call us in their business and  
2 they need help, then we can mobilize people in the  
3 community. If they have kids that go to school and they  
4 talk about how critical race theory is being implemented  
5 in their system, we can send parents their way.  
6 So it's a complete mobilization model.  
7 They can -- they can get access to those things without  
8 being a paid member. It's just we want to support the  
9 organization.  
10 Q. (By Mr. Skarnulis) You mentioned a  
11 newsletter, and Mr. Butler brought that up in his  
12 testimony. Has FEC United's newsletter ever mentioned  
13 Dr. Coomer or Dominion Voting Systems?  
14 A. No, I don't believe so.  
15 THE REPORTER: I'm sorry, sir, but you're  
16 cutting out.  
17 A. I don't recall that ever being done.  
18 Q. (By Mr. Skarnulis) Who publishes the  
19 newsletter?  
20 A. It's an event where people in different  
21 pillars contribute content. That content is then pushed  
22 through by Stephanie -- scheduled to push through by  
23 Stephanie.  
24 Do you want to know who the other board  
25 members are?

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1 Q. Sure.  
2 A. Okay. So Kevin Jenkins.  
3 Q. Okay.  
4 A. Rayanne Weber, Henry Allen, and John  
5 Tiegen.  
6 Q. Okay. Thank you for that.  
7 Does FEC United have an office?  
8 A. No, not per se, no. We register in  
9 Parker, Colorado, and people can work remotely or they  
10 can use an office space at the -- at Greenwood Village.  
11 Q. Okay. And that's -- that's -- Mr. Butler  
12 mentioned that that's a shared office space with PIN  
13 Business Network; is that right?  
14 A. Yes.  
15 THE REPORTER: I'm sorry, with? I'm  
16 sorry, with what business network?  
17 THE DEPONENT: PIN Business Network.  
18 MR. SKARNULIS: P-I-N, Laurel.  
19 Q. (By Mr. Skarnulis) Okay. Mr. Butler  
20 mentioned that FEC authorized an informational  
21 advertisement on Conservative Daily's podcast; is that  
22 right?  
23 A. I don't know what you're referring to. I  
24 can't -- I don't know what his -- I reviewed his  
25 testimony but, I mean, I didn't say that.

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1 Q. Okay.  
2 A. But I can -- I can -- if you ask me more  
3 questions as in, Is this true? I can answer those  
4 things.  
5 Q. Well, does FEC United advertise on  
6 Conservative Daily?  
7 A. It has, yes.  
8 Q. Okay. Does it now?  
9 A. From time to time I will talk about FEC  
10 United, but we do have not have any formal agreement at  
11 this time.  
12 Q. Did FEC United have a formal agreement?  
13 A. Yes, it did.  
14 Q. From when to when?  
15 A. I believe it was from August to November  
16 or December.  
17 Q. Okay.  
18 A. Six months or four months.  
19 Q. Was that a written contract?  
20 A. Yes.  
21 Q. And did FE --  
22 THE REPORTER: I'm sorry.  
23 Q. (By Mr. Skarnulis) Did FEC --let me try  
24 that again.  
25 Did FEC United pay for its informational

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1 advertisement on Conservative Daily podcast?  
2 A. Yes.  
3 Q. How much did FEC United pay for its  
4 advertising?  
5 A. I believe \$500.  
6 Q. \$500 a spot?  
7 A. No, just \$500.  
8 Q. Okay.  
9 A. So FEC did not actually -- they were  
10 billed for it, but they did not pay for it. So let me  
11 clarify. We had an agreement, but they didn't have the  
12 money to pay it. So that money was written off from CD  
13 Solutions to FEC United.  
14 Q. Who made -- maybe you actually answered my  
15 question. So there is a written contract between CD  
16 Solutions and FEC United?  
17 A. Yes.  
18 Q. All right. Who made the decision for FEC  
19 United not to pay CD Solutions for advertising?  
20 A. Well, there was no money to pay it. So I  
21 made the decision on behalf of CD Solutions to absolve  
22 them of the debt.  
23 Q. Do you know whether FEC United was  
24 advertising on Conservative Daily at the time that you  
25 first discussed Dr. Coomer? I believe that was

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1 November 9th.  
2 A. I don't recall.  
3 Q. Who was the president of FEC United at that  
4 time in November of 2020?  
5 A. Kristi Burton Brown.  
6 Q. And when did Ms. Brown stop being  
7 president?  
8 A. I don't recall.  
9 Q. Why was -- there was a period of time  
10 Mr. Butler testified where FEC United did not have a  
11 president; is that right?  
12 A. Yes.  
13 Q. Why did Ms. Brown step down as president?  
14 A. She ran for Colorado GOP chair.  
15 Q. And why did FEC United proceed without a  
16 president for some period of time?  
17 A. Because we didn't have a president for  
18 that period of time.  
19 Q. Were you ever president of FEC United?  
20 A. When that organization started, yes.  
21 Q. For how long?  
22 A. A couple months.  
23 Q. All right. We've seen some emails. Who  
24 has an FEC United email address?  
25 A. I don't know. 100 people probably.

Page 20


1 Q. How are -- how are those given out?  
2 A. They're given out by Stephanie when people  
3 bring people in as volunteers that head up other  
4 volunteers.  
5 Q. All right. She makes the decision on who  
6 has an FEC United email address?  
7 A. Stu makes the decision with Stephanie. So  
8 Stu would ultimately make that decision.  
9 Q. Is there a policy on the use of the FEC  
10 United email addresses?  
11 A. I'm sure there is. I'm not on that side  
12 of how they can or can't use it.  
13 Q. And the FEC United email addresses, would  
14 they typically be used for FEC United business only?  
15 A. Yes, typically.  
16 Q. Okay.  
17 A. I have an FEC United email address, and  
18 that's basically the email address that I use. So I'm  
19 grandfathered as a chairman of an FEC United email. I  
20 use it.  
21 Q. Do you have a personal email address that  
22 you also use?  
23 A. I have -- I've never really had a personal  
24 email address. I just use email -- my email. But I have  
25 a pro tem email, yes.

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1 10 business days. If you want it expedited, we can  
 2 expedite it. If you want to sync the transcript, that  
 3 normally takes about 10 business days unless you want  
 4 that expedited as well.  
 5 MR. KIMREY: Let's do the sync on the  
 6 video on a regular delivery. And then as far as the  
 7 transcript is concerned, we'll just take that on a  
 8 regular delivery as well.  
 9 THE REPORTER: Any other counsel ordering?  
 10 MR. HOLWAY: This is Eric Holway on behalf  
 11 of the Trump campaign. And I'd just like an E-Transcript  
 12 for regular delivery, please. Thank you.  
 13 THE REPORTER: Any other --  
 14 MS. BOEHMER: This is Margaret Boehmer on  
 15 behalf of Eric Metaxas. We'd like an E-Transcript,  
 16 regular delivery. No video, please. Thank you.  
 17 THE DEPONENT: Blaine just wants to see me  
 18 up-front and personal.  
 19 MR. KIMREY: I think I'm getting plenty of  
 20 that, Joe, so...  
 21 MS. DEFRANCO: We need to arrange for  
 22 reading and signing, and then take just our standard  
 23 electronic, please.  
 24 THE REPORTER: Okay. Thank you.  
 25 THE VIDEOGRAPHER: Okay. Really quick.  
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1 Anyone else for the video?  
 2 All right. If that's everyone, this  
 3 concludes the deposition of Joe Oltmann. Off the record  
 4 at 11:40 a.m.  
 5 MR. KIMREY: If this is on the record  
 6 right now, I wouldn't call it the deposition of Joe  
 7 Oltmann. It was the deposition --  
 8 THE VIDEOGRAPHER: Sorry.  
 9 MR. KIMREY: -- of the authorized  
 10 representative of FEC United.  
 11 THE VIDEOGRAPHER: So this concludes the  
 12 deposition of corporate rep for FEC United. Off the  
 13 record. 11:41 a.m.  
 14 \* \* \* \* \*  
 15 WHEREUPON, the foregoing deposition was  
 16 concluded at the hour of 10:41 a.m. Total time on the  
 17 record was 1 hour and 46 minutes.  
 18  
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1 I, JOE OLTMANN, the deponent in the above  
 2 deposition, do hereby acknowledge that I have read the  
 3 foregoing transcript of my testimony and state under oath  
 4 that it, together with any attached Amendment to  
 5 Deposition pages, constitutes my sworn testimony.  
 6  
 7 \_\_\_\_\_ I have made changes to my deposition  
 8 \_\_\_\_\_ I have NOT made any changes to my deposition  
 9  
 10  
 11 \_\_\_\_\_  
 12 JOE OLTMANN  
 13 Subscribed and sworn to before me this \_\_\_\_\_  
 14 day of \_\_\_\_\_, 20\_\_\_\_.  
 15  
 16 My commission expires: \_\_\_\_\_  
 17  
 18 \_\_\_\_\_  
 19 Notary Public  
 20  
 21 \_\_\_\_\_  
 22 Address  
 23  
 24  
 25  
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1 REPORTER'S CERTIFICATE  
 2  
 3  
 4 I, Laurel S. Tubbs, a Registered  
 5 Professional Reporter and Notary Public within the State  
 6 of Colorado, do hereby certify that previous to the  
 7 commencement of the examination, the deponent was duly  
 8 sworn by me to testify to the truth.  
 9 I further certify that this deposition was  
 10 taken in shorthand by me remotely and thereafter reduced  
 11 to a typewritten form; that the foregoing constitutes a  
 12 true and correct transcript.  
 13 I further certify that I am not related  
 14 to, employed by, nor of counsel for any of the parties or  
 15 attorneys herein, nor otherwise interested in the result  
 16 of the within action.  
 17 My commission expires September 1, 2023.  
 18  
 19   
 LAUREL S. TUBBS  
 20 Registered Professional Reporter,  
 21 Certified Realtime Reporter,  
 22 and Notary Public  
 23 Dated: September 10, 2021  
 24  
 25  
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