

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

DISTRICT COURT, COUNTY OF DENVER,  
STATE OF COLORADO

**EXHIBIT**  
**C**

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 ^

---

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.

---

VIDEO VIDEOCONFERENCED DEPOSITION OF THE AUTHORIZED  
REPRESENTATIVE OF CD SOLUTIONS, INC. BY JOE OLTMANN  
September 9, 2021

---

1 THE DEPONENT: Use.  
2 Q. (By Mr. Skarnulis) Okay.  
3 A. I think we have a copyright of some sort.  
4 But I think we ran into a copyright issue where other  
5 people had used it dating back to 2013 or '14. I'm  
6 trying to figure out the company that did that. But --  
7 Q. On November 9th, 2021, was CD Solutions,  
8 the entity that would have received revenue from the  
9 Conservative Daily website?  
10 A. Yes.  
11 Q. And was that the same entity that would  
12 have received revenue from the other revenue streams we  
13 just discussed?  
14 A. Yeah. Some of those revenue streams did  
15 not exist back then.  
16 Q. Okay. That's right.  
17 At the time, did -- in November of 2020,  
18 did the podcast have AirMediCare as a sponsor?  
19 A. It had different sponsors. No, it did  
20 not.  
21 Q. Did the podcast have My Pillow as a  
22 sponsor?  
23 A. No.  
24 Q. Did the podcast have --  
25 THE REPORTER: I'm sorry -

Page 18

1 Q. (By Mr. Skarnulis) -- and I  
2 believe -- I've seen the number of -- perhaps in Michelle  
3 Malkin's interview -- 800 to 1,000 members of Conservative  
4 Daily.  
5 A. Yeah.  
6 Q. I'm sorry. What was that?  
7 A. That is accurate.  
8 Q. All right. In November of 2020, how many  
9 members did Conservative Daily have?  
10 A. 800,000.  
11 Q. So it has not changed?  
12 A. It's actually gone down. So the way we do  
13 members is people sign up, they get information from  
14 Conservative Daily. And that number has been around  
15 800,000 for years.  
16 Q. Why do you think the membership has gone  
17 down?  
18 A. Well, it goes down because you have  
19 attrition, and then it goes back up. So it's static.  
20 Q. Did you -- did you notice any change in  
21 membership with Conservative Daily from November 9th,  
22 2020, through the present?  
23 A. As far as increases or decreases?  
24 Q. Either.  
25 A. It stays pretty steady. There's

Page 19

1 no -- again, there's no noticeable change or big increase  
2 in memberships. People saw the --  
3 (Telephone ringing.)  
4 THE REPORTER: I'm sorry. I didn't hear  
5 the last portion of your answer.  
6 A. There's no noticeable increase as far as  
7 people wanting to get information or signing up to be a  
8 part of Conservative Daily.  
9 Q. (By Mr. Skarnulis) Okay. I'm showing you  
10 what's been marked as Exhibit 129. And I'll represent  
11 that this was taken from the Colorado Secretary of State's  
12 website. You can see that in the upper left-hand corner.  
13 And it shows that CD Solutions registered its name as a  
14 foreign entity in November of 2018.  
15 Do you see that?  
16 A. Yes.  
17 Q. And then do you see that that name  
18 registration expired in January of 2019, right?  
19 A. Yes.  
20 Q. And at the time -- on November 9th, 2020,  
21 CD Solutions did not fix the expiration of its name  
22 registration in Colorado, right?  
23 A. That's not true. The main place that we  
24 operated from was not Colorado. So it would not  
25 change -- we would not change this to show registration

Page 20

1 of doing business as a foreign entity because the  
2 majority of the business was not done in Colorado.  
3 Q. Okay. November 9th, 2020, CD Solutions'  
4 name registration would have still expired in Colorado,  
5 right?  
6 A. The organization is not expired. The  
7 registered as a foreign entity is expired.  
8 Q. But CD Solutions was doing business in  
9 Colorado on November --  
10 A. CD Solutions was doing business across the  
11 entire country.  
12 Q. CD Solutions was doing business in Colorado  
13 on November 9th, 2020, right?  
14 A. CD Solutions was doing business in all 50  
15 states. So the answer to that question would be yes.  
16 Q. Okay. Does -- is CD Solutions responsible  
17 for the social media of Conservative Daily?  
18 A. Max runs social media for Conservative  
19 Daily.  
20 Q. But does -- is CD Solutions -- is it  
21 ultimately responsible for the content of Conservative  
22 Daily's social media?  
23 A. Yes.  
24 Q. Is CD Solutions ultimately responsible for  
25 the content on the podcast?

Page 21

1 evidence indicating that Eric Coomer has very large  
2 amounts of shares in Dominion Voting Systems?  
3 A. CD Solutions does not have that  
4 information.  
5 Q. Do you?  
6 A. This deposition is for CD Solutions, not  
7 for me.  
8 Q. But if you have a personal knowledge of  
9 that, that would be something that CD Solutions would  
10 have, right?  
11 A. No. I am not CD Solutions, nor am I an  
12 alter ego of CD Solutions. I run CD Solutions.  
13 Q. Well, when it came to making the  
14 allegations against Dr. Coomer, who, other than you at CD  
15 Solutions, was responsible for investigating the claims?  
16 A. I was responsible personally for  
17 investigating the claims, and I used CD Solutions for  
18 what it is, which is a platform to get the message out  
19 about the fraud perpetrated on the American people by  
20 Eric Coomer and Dominion Voting Systems.  
21 Q. So no one at CD Solutions investigated the  
22 claims?  
23 A. CD Solutions is a platform. I use that  
24 media platform in order to get the truth out about what I  
25 personally experienced as it relates to that phone call

Page 38

1 and as it relates to the information I was able to  
2 uncover about Mr. Coomer.  
3 Q. Okay. But CD Solutions stands by whatever  
4 allegations you made regarding Dr. Coomer, right?  
5 A. I am the CEO of CD Solutions. I made a  
6 decision to use that platform to get the message out  
7 there.  
8 Q. CD Solutions stands by the allegations made  
9 by you and Mr. McGuire regarding Dr. Coomer, right?  
10 A. As a CEO of CD Solutions, I stand by the  
11 truth that I told about Eric Coomer and Dominion Voting  
12 Solutions back in November of 2020, which is  
13 collaborated -- or is -- is -- has been bol- -- bolstered  
14 by all the evidence that's currently coming out. More  
15 evidence that will continue to come out.  
16 Q. Is that a Yes?  
17 A. I, in the capacity CEO of CD Solutions,  
18 100 percent believe that Eric Coomer was involved in the  
19 election fraud against the American people.  
20 Q. Okay. And you as the CEO, putting on your  
21 CEO hat, ratified and approved of whatever allegations  
22 have been made on the podcast, right?  
23 MS. DEFRANCO: Objection. Calls for a  
24 legal conclusion.  
25 Q. (By Mr. Skarnulis) You can answer.

Page 39

1 A. Did you get that? Can you repeat the  
2 question?  
3 Q. Sure. You, as the CEO of CD Solutions,  
4 stand by all of the allegations made by you or Mr. McGuire  
5 on the Conservative Daily podcast?  
6 A. I'm the CEO of Conservative Daily podcast.  
7 As a CEO of Conservative Daily podcast, I authorized the  
8 information that I had, to put it out there about the  
9 truth of Eric Coomer and who he is, and how -- and how it  
10 relates to the election fraud against the American people  
11 in November of 2020.  
12 MR. SKARNULIS: This will be Exhibit 136,  
13 Rebecca.  
14 (Video played.)  
15 Q. Is CD Solutions in possession of any  
16 evidence that Dr. Coomer holds shell corporations or  
17 offshore corporations?  
18 A. CD Solutions does not know.  
19 Q. Did CD Solutions perform any type of  
20 investigation prior to these allegations being made on the  
21 podcast into whether or not Dr. Coomer actually held shell  
22 corporations or offshore corporations?  
23 A. CD Solutions in its capacity did not, no.  
24 Me, in my personal capacity, I did --  
25 THE REPORTER: I'm sorry. There was

Page 40

1 overlap. Can you say that again, please.  
2 A. So CD Solutions did not. Myself in my  
3 personal capacity did, yes. CD is a platform -- CD  
4 Solutions is a platform. That platform by which I can  
5 get a message out there to many people. So I use that  
6 platform to get the truth out about the election fraud  
7 that happened on the 3rd of November of 2020.  
8 Q. (By Mr. Skarnulis) Does CD Solutions  
9 contend that it is a journalism platform?  
10 A. It's a news media platform.  
11 Q. Okay. Does CD Solutions have standards for  
12 the -- the content that is on its podcast?  
13 A. Yes.  
14 Q. What standards are those?  
15 A. To tell the truth.  
16 Q. Is there a written guideline?  
17 A. To tell the truth?  
18 Q. Okay. Is that written anywhere in CD  
19 Solutions' records?  
20 A. I'm sure it's written somewhere. I mean,  
21 it's an -- it's an ethical standard that's kind of novel  
22 these days in the media atmosphere. Except for if you're  
23 listening to OANN or Newsmax, they tend to tell the truth  
24 quite often.  
25 Q. Does anyone on the team at CD Solutions


Page 41

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

Page 70

1 Ms. Andrea Hall, Esq.  
 2 andrea@thehalllawoffice.com  
 3 September 10, 2021  
 4 RE: Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.  
 5 9/9/2021, CD Solutions, Inc. - Joe Oltmann (#4792308)  
 6 The above-referenced transcript is available for  
 7 review.  
 8 Within the applicable timeframe, the witness should  
 9 read the testimony to verify its accuracy. If there are  
 10 any changes, the witness should note those with the  
 11 reason, on the attached Errata Sheet.  
 12 The witness should sign the Acknowledgment of  
 13 Deponent and Errata and return to the deposing attorney.  
 14 Copies should be sent to all counsel, and to Veritext at  
 15 errata-tx@veritext.com.  
 16  
 17 Return completed errata within 30 days from  
 18 receipt of testimony.  
 19 If the witness fails to do so within the time  
 20 allotted, the transcript may be used as if signed.  
 21  
 22 Yours,  
 23 Veritext Legal Solutions  
 24  
 25

Page 72

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   
 20 LAUREL S. TUBBS  
 21 Registered Professional Reporter,  
 22 Certified Realtime Reporter,  
 23 and Notary Public  
 24 Dated: September 10, 2021  
 25

Page 71

1 Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.  
 2 CD Solutions, Inc. - Joe Oltmann (#4792308)  
 3 E R R A T A S H E E T  
 4 PAGE \_\_\_ LINE \_\_\_ CHANGE \_\_\_\_\_  
 5 \_\_\_\_\_  
 6 REASON \_\_\_\_\_  
 7 PAGE \_\_\_ LINE \_\_\_ CHANGE \_\_\_\_\_  
 8 \_\_\_\_\_  
 9 REASON \_\_\_\_\_  
 10 PAGE \_\_\_ LINE \_\_\_ CHANGE \_\_\_\_\_  
 11 \_\_\_\_\_  
 12 REASON \_\_\_\_\_  
 13 PAGE \_\_\_ LINE \_\_\_ CHANGE \_\_\_\_\_  
 14 \_\_\_\_\_  
 15 REASON \_\_\_\_\_  
 16 PAGE \_\_\_ LINE \_\_\_ CHANGE \_\_\_\_\_  
 17 \_\_\_\_\_  
 18 REASON \_\_\_\_\_  
 19 PAGE \_\_\_ LINE \_\_\_ CHANGE \_\_\_\_\_  
 20 \_\_\_\_\_  
 21 REASON \_\_\_\_\_  
 22 \_\_\_\_\_  
 23 \_\_\_\_\_  
 24 CD Solutions, Inc. - Joe Oltmann Date \_\_\_\_\_  
 25

Page 73