

DISTRICT COURT, COUNTY OF DENVER, COLORADO

Court Address:  
1437 Bannock Street  
Denver, Colorado 80202

▲ COURT USE ONLY ▲

Plaintiff:

ERIC COOMER

Case # 20-CV-34319

Defendants:

DONALD J. TRUMP FOR PRESIDENT, INC., Et al.

Div. 409

**Attorney for Defendants Joseph Oltmann, FEC United, and  
Shuffling Madness Media, Inc. d/b/a Conservative Daily**

Andrea M. Hall  
THE HALL LAW OFFICE, LLC  
P.O. Box 2251  
Loveland, CO 80539  
(970) 419-8234  
[andrea@thehalllawoffice.com](mailto:andrea@thehalllawoffice.com)  
Atty. Reg. #: 036410

**DECLARATION OF JOSEPH OLTMANN**

I, Joseph Oltmann, being over the age of eighteen and of sound mind, hereby state and declare as follows:


1. Prior to the filing of this lawsuit, I was represented by a different attorney, who had communications with Ms. Powell's attorney, and advised me that those communications were privileged.
2. I stored those communications in a folder I created to sequester privileged information.
3. I also had communications with Ms. Powell, or her staff, and believed those communications were similarly privileged.
4. During my search for communications responsive to the Plaintiff's request for

production, which took many hours to complete, I did not find the communications with Ms. Powell, and had forgotten they were sequestered in the folder.

5. When I recalled having them, and made my attorneys aware of them, they reviewed the communications with Ms. Powell and advised me that they were not privileged and should be disclosed immediately.
6. The communications were disclosed immediately thereafter.
7. I declare under penalty of perjury under the law of Colorado that the foregoing is true and correct.

Executed on the 29<sup>th</sup> day of September, 2021, at Arapahoe County, Colorado

Joseph Oltmann



---

C.R.S. § 13-27-106