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DISTRICT COURT, COUNTY OF DENVER,
STATE OF COLORADO

EXHIBIT
C

Court Address:
1437 Bannock Street
Denver, CO 80202

DATE FILED: September 29, 2021 4:48 PM
FILING ID: 630D5E698F489
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 through Conservative Daily controlled by CD Solutions that
 2 were relied on as the basis for allegations regarding
 3 shell corporations and Dr. Coomer.
 4 Has CD Solutions produced any such
 5 documents?
 6 A. I don't believe that's what I said.
 7 THE DEPONENT: Court reporter, can you go
 8 back and check that question for me? Can you do that or
 9 not?
 10 MS. DEFRANCO: Don't worry about it.
 11 Q. (By Mr. Skarnulis) She can't go back that
 12 far.
 13 Did CD Solutions, through the Conservative
 14 Daily email system, receive documents and emails from a
 15 person identified as the researcher?
 16 A. Yes. I do believe through -- sorry.
 17 Maybe through Conservative Daily or maybe through FEC
 18 United.
 19 MR. KIMREY: Sorry. What is our running
 20 time? Ms. Tubbs?
 21 THE REPORTER: I have an hour and
 22 27 minutes.
 23 MR. KIMREY: Okay.
 24 THE VIDEOGRAPHER: Give me one second.
 25 I'll look at mine.

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1 THE REPORTER: I hear people talking, but
 2 I cannot hear what they're saying and we're on the
 3 record.
 4 MR. SKARNULIS: Shane, were you getting us
 5 a time?
 6 THE VIDEOGRAPHER: I have an hour 24.
 7 Roughly the same.
 8 Q. (By Mr. Skarnulis) Did CD Solutions,
 9 through the Conservative Daily email system, receive
 10 emails related to Dr. Coomer having foreign bank accounts?
 11 A. I don't know.
 12 Q. Did CD Solutions, through its email system,
 13 receive documents or emails related to Dr. Coomer owning
 14 shell corporations?
 15 A. I don't know where that information came
 16 in to.
 17 Q. Are you able to produce the emails that
 18 were received on the Joe Otto email address for CD
 19 Solutions?
 20 A. All of those emails have been provided to
 21 you.
 22 Q. How do we determine that they come from
 23 that email address?
 24 A. All emails that came into Conservative
 25 Daily, whether be info@conservative-daily,

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1 Joeotto@conservative-daily were all funneled into an
 2 account where I can search all emails that came in from
 3 every angle that would have or be pertaining to Eric
 4 Coomer.
 5 Q. I will represent to you that the email
 6 production -- or the document production we have does not
 7 contain anything from that account.
 8 Is it your testimony that the emails as
 9 produced would not reflect the Joe Otto account?
 10 A. The emails that you have that show up
 11 currently at the very top say Joe@conservative-daily.com
 12 as the root account. If you look at the emails that are
 13 provided in there related to Eric Coomer, they come from
 14 Joeotto@conservative-daily.com.
 15 Q. Do you have the Bates numbers of any such
 16 emails that reflect that they're from the Joe Otto
 17 account?
 18 A. I don't have any access to that. You were
 19 supposed to provide me --
 20 THE REPORTER: I'm sorry. I can't hear
 21 you.
 22 A. So you provided me with information that I
 23 will be reviewing today for CD Solutions.
 24 Q. (By Mr. Skarnulis) Okay. My question is:
 25 Have you provided documents in this litigation that would

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1 evidence coming into the Joe Otto account?
 2 A. I produced every email coming to the Joe
 3 Otto account. That is pertaining to Eric Coomer.
 4 Q. That's not my question. How -- have you
 5 produced documents that would show that; that would say
 6 Joe Otto?
 7 A. Yes, I have.
 8 Q. In the email address?
 9 A. I provided you with screenshots because
 10 the raw files, you could not read. You asked for native
 11 files broken out, so I provided that. Those files could
 12 not be put back together or in their native format
 13 because that's what you asked for, so I took screenshots
 14 as was directed by the Court, where it said to take
 15 screenshots of those emails. I took screenshots of those
 16 email.
 17 Every single one of the emails related to
 18 Eric Coomer from Conservative
 19 Daily -- info@conservative-daily.com or
 20 Joeotto@conservative-daily.com.
 21 And the only difference -- differentiator
 22 was the email I used to get into to look at all of those
 23 root accounts. So your IT people could even tell you
 24 what I'm telling you is accurate.
 25 Q. My question is: Do we have versions that

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<p>1 we are able to ascertain came to the Joe Otto account? 2 A. All of the emails that came in I provided, 3 came in either from info@conservative-daily.com or 4 through Joeotto@conservative-daily.com. There was never 5 an email of Joeotto@conservative-daily.com. 6 Q. What email address did the researcher use? 7 A. From the email that I'm looking at right 8 now, it shows that it came into contact@FECUnited.com. 9 That was then forwarded to Joe@FECUnited.com. 10 Q. Did the researcher ever email a 11 Conservative Daily address? 12 A. Yes. 13 Q. When? 14 A. The email that we have in discovery 15 dated -- or excuse me, that shows and you've received 16 it -- is 1001_conservative-daily -- -daily_ 01052021.eml. 17 It was dated and it came into 18 info@conservative-daily.com, and this says on 19 January 5th, 2021, at 5:20 p.m. 20 It was provided in the discovery. The 21 document that I sent over that shows on this document is 22 what I just stated clearly. 23 THE REPORTER: I'm sorry? 24 THE DEPONENT: I'm sorry. 25 Q. (By Mr. Skarnulis) Was that in the second Page 62</p>	<p>1 THE DEPONENT: Can you hold on one second, 2 please. 3 MR. SKARNULIS: Sure. 4 (Pause.) 5 MS. DEFRANCO: Oh, back on the record. 6 THE DEPONENT: We were never off the 7 record. 8 MS. DEFRANCO: So are you -- so, 9 Mr. Skarnulis, what you're telling us is that you're 10 recessing at this time because you think there's 11 something that you don't have that you want to inquire 12 into? 13 MR. SKARNULIS: Yes. 14 MS. DEFRANCO: Okay. So based on that, I 15 have a couple of questions that I'd like a couple 16 clarifications from my client. 17 I want to make sure the court reporter can 18 hear me. 19 THE REPORTER: If you could get closer, 20 please, that would help. 21 MS. DEFRANCO: All right. 22 EXAMINATION 23 BY MS. DEFRANCO: 24 Q. So, Mr. Oltmann, you had email 25 communications with this individual you're calling the Page 64</p>
<p>1 supplemental disclosures? 2 A. Honestly, Steve, I don't know because I 3 don't know what -- there was stuff that was sent in the 4 supplemental discovery that replaced other discovery. I 5 sent over an entire file that gave a full box of all 6 discovery items as requested under the discovery request. 7 Q. Okay. 8 THE REPORTER: I'm sorry. I'm sorry. I'm 9 sorry. I just did not understand. Please start again. 10 A. The email -- the folder that came over, 11 Steve, to you, will be emails, plus attachments. I 12 apologize. That's how I sent it. I don't know if that's 13 how they sent it over to you. 14 MR. SKARNULIS: Okay. At this point I'm 15 going to suspend this deposition and reserve the right to 16 seek additional relief from the Court and potential 17 additional deposition testimony if necessary. 18 The issues at hand concerning the 19 investigation of CD Solutions or Conservative Daily and 20 the veracity of the allegations made about Dr. Coomer is 21 critical to the analysis of liability, including the 22 element of actual analysis, which of course we do not 23 concede is required. So at this time, with that on the 24 record, I'll pass the witness. 25 MS. DEFRANCO: I have nothing. Page 63</p>	<p>1 researcher, correct? 2 A. Not directly, but yes. 3 Q. Okay. Did you have any other sort of 4 communication with the researcher? 5 A. Yes. 6 Q. What sort of communications did you have 7 with the researcher? 8 A. I believe I had a phone call with the 9 researcher. 10 Q. And in what capacity were you acting when 11 you spoke with the researcher on the phone? 12 THE REPORTER: I'm sorry. I can't hear 13 you. 14 THE DEPONENT: Me, as an individual. 15 Q. (By Ms. Defranco) As you sit here today, 16 do you know -- can you tell us for sure where the 17 information that you have regarding the shell companies 18 and offshore accounts came from? 19 A. Not directly. But I turned over all the 20 information that was required underneath the discovery 21 order, and then some. We sifted through that in order to 22 get the information to counsel. 23 Q. So would it necessarily have been an email 24 from the researcher? 25 A. It might have been. Page 65</p>

1 Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.

2 CD Solutions, Inc. - Joe Oltmann (#4792308)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, CD Solutions, Inc. - Joe Oltmann, do hereby declare that I

5 have read the foregoing transcript, I have made any

6 corrections, additions, or changes I deemed necessary as

7 noted above to be appended hereto, and that the same is

8 a true, correct and complete transcript of the testimony

9 given by me.

10

11 _____

12 CD Solutions, Inc. - Joe Oltmann Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 _____ DAY OF _____, 20__.

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NOTARY PUBLIC

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Colorado Rules of Civil Procedure
Chapter 4, Disclosure and Discovery
Rule 30

(e) Review by Witness; Changes; Signing. If requested by the deponent or a party before completion of the deposition, the deponent shall be notified by the officer that the transcript or recording is available. Within 35 days of receipt of such notification the deponent shall review the transcript or recording and, if the deponent makes changes in the form or substance of the deposition, shall sign a statement reciting such changes and the deponent's reasons for making them and send such statement to the officer. The officer shall indicate in the certificate prescribed by subsection (f)(1) of this rule whether any review was requested and, if so, shall append any changes made by the deponent.

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