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Exhibit A

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VIDEOCONFERENCED APPEARANCES:
ON BEHALF OF THE PLAINTIFF:
CHARLES J. CAIN, ESQ.
BRAD KLOEWER, ESQ.
STEVE SKARNULIS, ESQ.
ZACH BOWMAN, ESQ.
Cain & Skarnulis PLLC
P.O. Box 1064
Salida, California 81201
Phone: 719-530-3011
Email: ccain@cstrial.com
Email: bkloewer@cstrial.com
Email: skarnulis@cstrial.com
Email: zbowman@cstrial.com
ON BEHALF OF THE PLAINTIFF:
THOMAS M. ROGERS III (TREY), ESQ.
Recht Kornfeld PC
1600 Stout Street, Suite 1400
Denver, Colorado 80202
Phone: 303-573-1900
Email: trey@rklawpc.com
ON BEHALF OF THE DEFENDANT DONALD J. TRUMP
FOR PRESIDENT, INC.:
ERIC R. HOLWAY, ESQ.
BETH CHAMBERS, ESQ.
Jackson Kelly PLLC
1099 18th Street, Suite 2150
Denver, Colorado 80202
Phone: 303-390-0016
Email: eric.holway@jacksonkelly.com
Email: beth.chambers@jacksonkelly.com
ON BEHALF OF THE DEFENDANT DEFENDING THE REPUBLIC:
CHRISTOPHER SEERVELD, ESQ.
Dymond • Reagor, PLLC
8400 East Prentice Avenue, Suite 1040
Greenwood Village, Colorado 80111
Phone: 303-734-3400
Email: cseerveld@drc-law.com

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18
19
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24
25

VIDEOCONFERENCED APPEARANCES (Cont'd):
ON BEHALF OF THE DEFENDANT SIDNEY POWELL AND
SIDNEY POWELL PC:

BARRY ARRINGTON, ESQ.
Arrington Law Firm
3801 East Florida Avenue, Suite 830
Denver, Colorado 80210
Phone: 303-205-7870
Email: barry@arringtonpc.com

ON BEHALF OF THE DEFENDANTS JOSEPH OLTMANN, FEC UNITED,
and SHUFFLING MADNESS MEDIA, INC., d/b/a CONSERVATIVE DAILY:

ANDREA M. HALL, ESQ.
The Hall Law Office, LLC
P.O. Box 2251
Loveland, Colorado 80539
Phone: 970-419-8234
Email: andrea@thehalllawoffice.com

ON BEHALF OF THE DEFENDANTS JOSEPH OLTMANN, FEC UNITED,
and SHUFFLING MADNESS MEDIA, INC., d/b/a CONSERVATIVE DAILY:

INGRID J. DEFRANCO, ESQ.
The Law Office of Ingrid J. Defranco
P.O. Box 128
Brighton, Colorado 80601
Phone: 303-443-1749
Email: defrancoi@yahoo.com

ON BEHALF OF THE DEFENDANTS JAMES HOFT AND
TGP COMMUNICATIONS, LLC d/b/a THE GATEWAY PUNDIT:

JONATHAN BURNS, ESQ.
The Burns Law Firm
P.O. Box 191250
St. Louis, Missouri 63119
Phone: 314-329-5040
Email: tblf@pm.me

ON BEHALF OF THE DEFENDANTS JAMES HOFT AND
TGP COMMUNICATIONS, LLC d/b/a THE GATEWAY PUNDIT:

RANDY CORPORON, ESQ.
Law Offices of Randy B. Corporon, PC
2821 South Parker Road, Suite 555
Aurora, Colorado 80014
Phone: 303-749-0062
Email: rbc@corporonlaw.com

1 VIDEOCONFERENCED APPEARANCES (Cont'd):
2 ON BEHALF OF THE DEFENDANT MICHELLE MALKIN:
3 GORDON QUEENAN, ESQ.
4 Patterson & Ripplinger, PC
5 5613 DTC Parkway, Suite 400
6 Greenwood Village, Colorado 80111
7 Phone: 303-741-4539
8 Email: gqueenan@prpclegal.com
9 ON BEHALF OF THE DEFENDANT ERIC METAXAS:
10 MARGARET BOEHMER, ESQ.
11 Gordon & Rees
12 555 17th Street, Suite 3400
13 Denver, Colorado 80202
14 Phone: 303-534-5160
15 Email: mboehmer@grsm.com
16 ON BEHALF OF THE DEFENDANT CHANEL RION And ONE AMERICA
17 NEWS NETWORK:
18 BLAINE KIMREY, ESQ.
19 BRYAN CLARK, ESQ.
20 Vedder Price
21 222 North LaSalle Street
22 Chicago, Illinois 60601
23 Phone: 312-609-7865
24 Email: bkimrey@vedderprice.com
25 Email: bclark@vedderprice.com

ON BEHALF OF THE DEFENDANTS CHANEL RION and ONE AMERICA
NEWS NETWORK:
STEPHEN DEXTER, ESQ.
Lathrop GPM LLP
1515 Wynkoop Street, Suite 600
Denver, Colorado 80202
Phone: 720-931-3200
Email: stephen.dexter@lathropgpm.com
ON BEHALF OF THE DEFENDANTS CHANEL RION and HERRING
NETWORKS, INC. d/b/a ONE AMERICA NEWS NETWORK:
PETER SCOTT, ESQ.
JEREMY GRAY, ESQ.
Early Sullivan Wright Gizer & McRae LLP
6420 Wilshire Boulevard, 17th Floor
Los Angeles, California 90048
Phone: 970-419-8234
Email: pscott@earlysullivan.com
Email: jgray@earlysullivan.com

1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: Here begins the
3 deposition of Joseph Oltmann. Today's date is
4 September 8th, 2021. The time on the video is 10:04.

5 Counsel, please identify yourselves for
6 the record and state whom you represent.

7 MR. CAIN: Charlie Cain for the Plaintiff.

8 MS. DEFRANCO: Ingrid DeFranco and Andrea
9 Hall for Mr. Oltmann.

10 THE VIDEOGRAPHER: Will the court reporter
11 please swear in the witness after her read.

12 THE REPORTER: The attorneys participating
13 in this deposition acknowledge that I am not physically
14 present in the deposition room and that I will be
15 reporting this deposition remotely. They further
16 acknowledge that in lieu of an oath administered in
17 person, the witness will verbally declare his testimony
18 in this matter is under penalty of perjury. The parties
19 and their counsel consent to this arrangement and waive
20 any objections to this manner of reporting. Please
21 indicate your agreement by stating your name and your
22 agreement on the record, beginning with the taking
23 attorney.

24 MR. CAIN: Charlie Cain. I agree.

25 MS. HALL: Andrea Hall and Ingrid

1 DeFranco. We agree.

2 JOSEPH OLTMANN,
3 having been first duly sworn or affirmed, was examined and
4 testified as follows:

5 EXAMINATION

6 BY MR. CAIN:

7 Q. State your full name, please.

8 A. Joseph Oltmann.

9 Q. Mr. Oltmann, you understand you're here to
10 give testimony as a result of a court order issued by
11 Judge Moses in this case, correct?

12 A. I do.

13 Q. Part of what she asked us to do is to
14 provide exhibits to you via your counsel. We did so last
15 night. Those exhibits were to be printed out and put in a
16 binder.

17 Do you have a binder of exhibits in front
18 of you?

19 A. I do not. I have a computer screen with
20 those up, though.

21 Q. Mr. Oltmann, instead of being in person, we
22 are obviously conducting this deposition via Zoom, so I'm
23 not there to -- to look at what you're looking at or
24 perceive any information that you're getting outside of
25 the context of my questions and your answers. So let me

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1 explain a couple of things to you.

2 First of all, you are to not have any
3 recording devices in your office. You are in your office,
4 are you not?

5 A. It doesn't matter where I am. It's not
6 relevant.

7 Q. You are in your office?

8 A. It's not relevant.

9 Q. Let me explain to you, sir, how this is
10 going to go. I'm going to ask the questions. You're
11 going to answer my questions. It's up to your counsel to
12 advise you if they perceive that there's a privilege issue
13 or some other reason that you shouldn't answer my
14 questions.

15 Are you in your office or not?

16 A. (No Response.)

17 MS. HALL: Objection, Charlie. It's not
18 relevant. Move on.

19 MR. CAIN: Are you instructing your client
20 not to answer the questions where he's physically
21 located?

22 MS. HALL: Move on.

23 MR. CAIN: Yes or no.

24 MS. HALL: I said, Yes. Move on, Charlie.
25 It's not relevant.

1 MR. CAIN: Don't talk over me.

2 Q. (By Mr. Cain) It's important, Mr. Oltmann,
3 that you and I understand each other. If there's some
4 reason that you don't understand my questions, will you
5 stop me, ask me to rephrase the question, so that I can be
6 sure that you understand what I'm asking you and you're
7 answering the question that I'm asking?

8 A. Yes.

9 Q. Are you recording -- do you have a
10 recording device with you where you're sitted -- or
11 seating now currently? Are you recording this?

12 A. No. This is being recorded.

13 Q. No, I understand that.

14 My question is: Are you recording it
15 separately?

16 A. No.

17 Q. Mr. Oltmann, you are to not communicate
18 outside the parties during the course of this deposition.
19 That would include getting instructions on how to answer
20 questions from your counsel.

21 Do you understand that?

22 A. Yes.

23 Q. I want only your testimony and your
24 testimony alone. Who else is with you physically right
25 now?

1 MR. CAIN: Charlie, I'm going to object to
2 this line of questioning. How is this relevant? You've
3 not done this with one other person that you've done a
4 deposition over Zoom with. So I suggest you start asking
5 questions because your time is running.

6 Q. (By Mr. Cain) Who else is with you
7 physically present --

8 MR. CAIN: And I'm not going to allow
9 speaking objections, and I will ask for more time if you
10 keep it up.

11 Q. (By Mr. Cain) Who else is with you,
12 Mr. Oltmann?

13 A. My attorneys.

14 Q. Anyone else?

15 A. No.

16 Q. Mr. Oltmann, have you reviewed the
17 protective order that Judge Moses entered in this case?

18 A. No.

19 Q. Are you aware that there's a protective
20 order that would prohibit the disclosure of individuals
21 that were on the antifa call or your conduit to that call,
22 disclosure outside of these proceedings? Are you aware of
23 that?

24 A. Yes.

25 Q. Are you prepared to testify today regarding

1 the identity of your conduit to the antifa call?

2 A. Can you repeat that question again?

3 Q. Are you prepared to testify today
4 concerning the identity of the individual or individuals
5 who gave you access to the antifa call?

6 A. To a certain extent.

7 Q. To what extent?

8 A. To the extent that I give you what
9 information is readily available.

10 Q. Who provided you access -- what's the
11 identity of the individual or individuals who provided you
12 access to the antifa call?

13 A. I made a commitment not to disclose the
14 name of that person. Unfortunately, that person who is
15 known to me is actually in my notes.

16 Q. In the notes of the call?

17 A. Yes.

18 Q. Okay. Who is it?

19 A. That's all I'm going to say.

20 Q. You understand the Court has ordered you to
21 provide us that information. You understand that?

22 A. I'm not going to provide that information.

23 Q. I'm sorry?

24 A. Mr. Coomer is on this call. Mr. Coomer is
25 the one that presented the antifa manifesto in his social

1 media. Mr. Coomer was the one that was on that call. So
2 as a result of that, no protection order would protect
3 this individual.

4 Q. Who is the -- who is the person that was
5 your conduit? Give me the identity of that person.

6 Are you refusing to answer my question?

7 A. I answered your question already. You
8 just didn't like the answer.

9 Q. No. I didn't get the answer to the
10 question. The question was: Who is the person or persons
11 who served as the conduit for you to be on the antifa
12 call? Give me the name.

13 A. I gave you the information as it relates
14 to the information that's in my notes, and you have my
15 notes. So therefore you have that name.

16 Q. Joey Camp?

17 A. No.

18 Q. All right. Who?

19 A. The information as to who gave me access
20 to that call is inside of the notes.

21 Q. All right. One of the documents that I
22 identified for you was Plaintiff's Exhibit 29, which I
23 understand to be your notes.

24 Do you have that?

25 A. Hold on one second.

1 MR. KIMREY: Mr. Cain, this is Blaine
2 Kimrey. Have these exhibits been provided to the other
3 counsel of record in this case?

4 MR. CAIN: Yes.

5 MR. KIMREY: I will note for the record
6 that I did not receive copies of these exhibits. I am
7 counsel for OANN and Chanel Rion. Can you have your
8 office forward to me a file of the exhibits right now?

9 MR. CAIN: No. I think, Blaine -- and
10 welcome to the case -- you should have the Exhibit Share
11 function and you can -- you can view them on that through
12 Veritext. But I don't want to waste time on the record
13 with this right now.

14 MR. KIMREY: Okay. Fair enough.

15 MR. CAIN: We can talk about it off-line.

16 Q. (By Mr. Cain) Do you have Exhibit 29 up,
17 Mr. Oltmann?

18 A. I'm actually not seeing Exhibit 29.

19 Q. It's a copy of your notes.

20 A. Okay. I'm looking at it now.

21 Q. All right. And these are notes, correct me
22 if I'm wrong, that you say were taken contemporaneously by
23 you while you were on that call; is that true?

24 A. Yes.

25 Q. Okay. And this is one, two, three -- four

1 pages of notes, correct?

2 A. Yes.

3 Q. Where in your notes is the identity of your
4 conduit to the call reflected?

5 A. It is -- it is on this page, yes.

6 Q. Which page? There's a Bates stamp -- what
7 we call Bates stamp down on the bottom right. 205, 206,
8 207, 208 are the page numbers on these notes. Which page?

9 A. There's no stamp on this page. Oh, there
10 it is. 205.

11 Q. All right. So 205 starts, Who is Eric
12 Dominion guy. Is that the one you're looking at?

13 A. It is.

14 Q. Denver, Colorado Springs, question mark?
15 Then there's the Brian. Who's Brian? If I'm reading that
16 correctly. Does that say Brian?

17 A. That is not -- that is not who gave me
18 access to the call.

19 Q. Who is Brian?

20 A. He's an antifa member. He's a journalist,
21 I think.

22 Q. What's his last name?

23 A. I don't know.

24 Q. Was he on the call?

25 A. I don't recall actually. I'd have to go

1 through my notes.

2 Q. The next name is -- that appears to be a
3 name is Bev, B-e-v. Who is that?

4 A. How do I get to the other pages?

5 MS. HALL: Just scroll up.

6 THE DEPONENT: Oh, scroll up. Okay. Got
7 it.

8 Q. (By Mr. Cain) Who is Bev, that's the
9 question I asked?

10 A. Bev is the name of somebody that came up
11 on the call.

12 Q. What do you mean? You saw a name appear?

13 A. Yes.

14 Q. Okay. Do you have a last name?

15 A. No.

16 Q. Do you know who she is?

17 A. No.

18 Q. Was this a Zoom? Was this a Zoom call?

19 A. Yes.

20 Q. So you could see the name of the
21 participants that had logged into the call, at least with
22 respect to Bev, right?

23 A. Yes.

24 Q. Okay. Did you see Eric Coomer on the Zoom
25 call reflected?

1 A. No.

2 Q. Sam -- well, actually before I move off of
3 Bev. Have you subsequently learned who this person is,
4 Bev?

5 A. Yes. It's an antifa member.

6 Q. Okay. What do you know about her?

7 A. Not a lot, actually.

8 Q. All right. What do you know?

9 A. Not a lot. I'd have to review my notes.

10 Q. Is there something -- when you say your
11 notes, are you referring to Exhibit 29 or some other
12 notes?

13 A. Just information that I would have
14 on -- on her.

15 Q. Okay. Are those reflected on Exhibit 29 or
16 some other notes?

17 A. It wasn't pertaining to any of this
18 hearing, so I don't even -- I know that --

19 THE REPORTER: I'm sorry, but there's too
20 much background noise. I can't understand the witness.

21 Could I have the answer repeated, please?

22 THE DEPONENT: There's no noise on my
23 side.

24 Q. (By Mr. Cain) Can you repeat your answer?
25 She didn't hear you. She needs to get it down for the

1 record.

2 A. I did collect notes on some of these
3 people. So if I have notes on her, then it would
4 be -- it wouldn't be in these notes, though.

5 Q. Okay. But you do have notes reflecting
6 some investigation of who she was?

7 A. I have questions that I asked when I
8 started contacting other people that were doing research
9 on antifa specifically.

10 Q. Okay. So do you have notes that reflect
11 who she is -- who her identity is?

12 A. I was -- I was never able to uncover who
13 she is, specifically.

14 Q. How about any organization she's involved
15 with? Do you know that?

16 A. Antifa.

17 Q. The next name is Sam with a question mark.
18 Who are you referring to there? Is that your conduit?

19 A. No.

20 Q. Who is Sam? What information do you have
21 on this person?

22 A. He's an antifa member.

23 Q. How do you know?

24 A. Because he was on the call.

25 Q. Do you have a last name?

1 A. No, no, not as it pertained to the
2 information I was able to collect here.

3 Q. Well, why did you qualify that? Do you
4 have any identifying information on this Sam who was on
5 the call?

6 A. I was told by someone else that a man that
7 went by the name of Sam died a couple months ago. He was
8 heavily involved in antifa.

9 Q. Who told you that?

10 MS. HALL: Object to form.

11 Q. (By Mr. Cain) You can answer.

12 A. It doesn't --

13 THE REPORTER: I'm sorry. I just --

14 A. I said it doesn't have to do with Eric.

15 Q. (By Mr. Cain) Who told you that is the
16 question? You can answer the question.

17 A. Joey Camp.

18 Q. Yan-ni is the next name. And then there's
19 a dash RD knows.

20 Is Yan-ni the conduit to your participation
21 on this call?

22 A. No.

23 Q. Do you know who Yan-ni is? Do you have a
24 last name or any other identifying information?

25 A. He goes by the name of Yan or Yan-ni. He

1 seems to be an enforcer for the Antifa/BLM movement.

2 Q. Were you able to identify this person
3 beyond that?

4 A. To some degree, yes.

5 Q. Okay. Tell me -- do you have an address?
6 Do you have a last name? What identifying information do
7 you have?

8 A. Just information related to the fact that
9 he was not a journalist. I wasn't able to disqualify him
10 from being a journalist.

11 Q. How?

12 A. By looking up all known people that go by
13 Yan or Yan-ni.

14 Q. When you were looking up all known people
15 that go by Yan or Yan-ni, were you able to determine who
16 this person is specifically? Is he a mechanic in the
17 Springs?

18 A. No. Because that's not what I was looking
19 for.

20 Q. So if -- if you wanted to get in touch with
21 Yan-ni at this point -- or Yan, you wouldn't know how to
22 do it?

23 A. I didn't try to get in touch with an
24 antifa member. I didn't try.

25 Q. Okay. So you -- you don't have any

1 information beyond what you told me about Yan or Yan-ni;
2 is that true?

3 A. No, that's not true.

4 Q. What other information do you have on this
5 person?

6 A. That he's an antifa member.

7 Q. You've already told me that. I said what
8 other information.

9 A. I'm trying to find the information. So
10 hold on a second. I'll see if I can pull up a --

11 Q. Tell me what you're doing when you're doing
12 it too. Are you on --

13 A. I'm just searching files to see anything
14 that I have on Yan or Yan-ni.

15 Q. I only have so much time, so if you can't
16 find it now, then at a break we can see if we can pull
17 that information down.

18 A. All right. Sounds good.

19 Q. Then there's a dash RD knows. Who's RD?
20 What do those initials stand for?

21 What are you looking at, Mr. Oltmann?

22 A. My attorney.

23 Q. Who is RD? The lawyer can't give you the
24 answer. I can't -- this is not their deposition. This is
25 your deposition.

1 A. I'm not sure you understand the
2 significance of what we're dealing with. As a matter of
3 fact, I don't think you care. So I'm going to answer
4 it -- I'm going to answer it this way. You asked me for
5 an answer, I'm going to give you an answer.

6 In the last two weeks we've had two antifa
7 members that have targeted and tried to kill other
8 people. We have one that tried to assassinate a guy in
9 Olympia, Washington. We have another guy in California
10 that was hunted for stabbing someone at a protest, who is
11 a known antifa member.

12 We have Joey Camp who's currently in
13 hiding and had to move locations twice in the last couple
14 of months due to antifa putting a hit out on his life.
15 There's another gentleman that worked for Project Veritas
16 out of New York and in 2019/2020 had a posted bounty for
17 his head.

18 And then there's the dark web of the
19 bounty that's currently on my head by antifa in Colorado
20 and other states. So you want me to divulge information
21 which, frankly, would need someone like Eric Coomer back
22 to this individual for retribution. And since we know
23 that the history of Coomer is to have retribution against
24 people, there's a hesitation on my side to divulge
25 anything based on the imminent danger to that particular

1 individual.

2 MR. CAIN: Objection. Nonresponsive.

3 Q. (By Mr. Cain) Who is RD? And I'm going to
4 ask the Court for more time if this continues. I want
5 responses to my questions.

6 A. I answered the question.

7 Q. Who is RD?

8 A. I'm asking for the truth, and you can't
9 handle the truth. Or you don't care about the trust,
10 which is obvious by how you act in a courtroom and how
11 you lie in your proceedings.

12 Q. Who is RD? Are you going to answer my
13 question or not? What does that stand for?

14 A. That stands for the individual that gave
15 me access to the call.

16 Q. What's the name?

17 A. That's his name.

18 Q. RD is his name?

19 A. Is his name.

20 Q. What's his last name?

21 A. RD.

22 Q. No, sir. That -- that's not his name.

23 A. That's his --

24 Q. Give me the name.

25 A. That's the information I have on that

1 individual.

2 Q. Pardon?

3 A. That is the information that I have on
4 that individual.

5 Q. That's the entirety of the information.
6 You know this person by RD, period?

7 A. I know that person by RD.

8 Q. And you don't know his first name?

9 A. I know that person by RD.

10 Q. Do you know his actual first name or not?

11 MS. HALL: Objection.

12 Q. (By Mr. Cain) Let's quit playing games.

13 MR. CAIN: Counsel, I'm asking a question.

14 MS. HALL: He's answered you three times.

15 A. I answered the question.

16 MS. HALL: You don't like the answer. He
17 told you he knows the individual by the initials RD.

18 Q. (By Mr. Cain) Do you know his actual name,
19 is the question.

20 A. His name is RD. That is his name.

21 Q. Do you know -- what's his last name?

22 A. RD is his name. If you know anything
23 by --

24 Q. What is his last name, sir? What is his
25 last name?

1 A. If you know anything about the antifa
2 movement, everyone in antifa uses names -- other names.
3 That is the name that he gave me.

4 Q. What is Eric Coomer's antifa name?

5 A. What do you mean Eric Coomer's antifa
6 name?

7 Q. You said everybody in antifa uses other
8 names. What is his -- Eric Coomer's antifa name?

9 A. I believe Eric Coomer loves his notoriety.
10 I believe Eric Coomer is one that likes to be in the
11 middle of the limelight. I believe Eric Coomer is the
12 one that wants to be the one in charge. And frankly, on
13 the call, no one knew -- or there were people that didn't
14 know who he was because they asked who he was.

15 Q. Sir, you're being evasive. I --

16 A. That is not evasive. That is the answer
17 to the question. You asked a question; I answered it.

18 Q. I know. I asked a different question that
19 you didn't answer.

20 A. What was that?

21 Q. So let me ask this question again.

22 Are you in contact with RD --

23 A. I'm not.

24 Q. -- or not?

25 When is the last time you spoke with this

1 individual?

2 A. Five months ago, six months ago.

3 Q. Where does this person live?

4 A. I do not know.

5 Q. In Colorado?

6 A. I do not know.

7 Q. How did you get in touch with this person
8 initially?

9 A. He showed up at an FEC meeting.

10 Q. Where?

11 A. In Castle Rock, Colorado.

12 Q. Is he a member of FEC?

13 A. I do not know the answer to that.

14 Q. Who would?

15 A. I would have to check and see if the
16 member --

17 THE REPORTER: I'm sorry, sir. Just a
18 moment. I'm sorry. I just didn't hear or understand the
19 last part of the answer. Can you repeat, please?

20 THE DEPONENT: I would have to check with
21 FEC to see if they have a record of him in their
22 memberships.

23 Q. (By Mr. Cain) Can you do that for me since
24 we're taking FEC's deposition tomorrow?

25 A. Hold on.

1 Q. All right. I'm going to circle back to
2 what I was asking you about RD. Do you know this person's
3 actual name or not?

4 MS. HALL: Object to form.

5 A. He presented himself as RD.

6 MR. CAIN: Objection. Nonresponsive.

7 Q. (By Mr. Cain) My question is: Do you
8 know --

9 MS. HALL: He answered the question. You
10 don't like the answer. That's your problem. You've
11 asked this question at least five times. He's answered
12 the question. And you keep asking the same question, and
13 you don't like the answer.

14 MR. CAIN: Ms. Hall, you can guarantee
15 that I'm going to be asking for more time if you keep
16 interrupting my questions.

17 Q. (By Mr. Cain) My question was: Do you
18 know his actual ID beyond these initials? Do you know his
19 name, and you're just not providing it to me?

20 A. He was known to me as RD. He was very,
21 very careful and very, very scared about himself coming
22 out in any of this. I've already given you more
23 information than I think I'm probably -- that I've been
24 told I can give.

25 Q. (By Mr. Cain) Told by whom?

1 MS. HALL: Objection.

2 A. I've given -- I've answered your question.

3 Q. (By Mr. Cain) No, you haven't.

4 My question is this: You say he presented
5 himself as RD. That's fine. I understand your testimony
6 there. But my question wasn't how he presented himself.
7 My question was: Do you actually know his -- his full
8 name -- his identification and you're just not providing
9 that to me?

10 A. I do not know his full name.

11 Q. Do you know his first name?

12 A. I've never verified his identity.

13 Q. So you don't know his first name?

14 A. He was known to me as RD. I've given you
15 the information of who he is.

16 Q. RD isn't a first name. And my question is:
17 Do you know what the R stands for?

18 A. No.

19 Q. Let's go about it that way. Richard?
20 Roger? Rick? Do you know?

21 A. I do not know what the R stands for.

22 Q. Do you know what the D stands for? His
23 last name, perhaps?

24 A. I do not know what the D stands for.

25 Q. Do you have contact information for him? A

1 phone number?

2 THE REPORTER: I'm sorry. The answer?

3 THE DEPONENT: I do not.

4 Q. (By Mr. Cain) You said five or six months
5 ago was the last time you were in contact with him. Is
6 that your testimony?

7 A. To the best of my recollection, yes.

8 Q. How did you get in touch with him?

9 A. Through a Signal.

10 Q. What is his Signal handle?

11 A. RD.

12 Q. Have you produced your communications from
13 Signal to your counsel with RD?

14 MS. HALL: Objection. You're asking for
15 attorney-client privileged information. He's not
16 answering that question.

17 MR. CAIN: No, I'm not asking for
18 attorney-client information. The fact of providing the
19 information to counsel isn't privileged.

20 MS. HALL: Yes, it is.

21 MR. CAIN: It doesn't fall under advice.

22 Q. (By Mr. Cain) Do you have access to your
23 Signal communications with RD, Mr. Oltmann?

24 A. No.

25 Q. Why not?

1 A. Because Signal deletes after 5 minutes,
2 10 minutes. Those communications are deleted inside the
3 app.

4 Q. So there -- there is information that you
5 have in terms of communications with your conduit that
6 have been deleted as a result of the use of the Signal
7 app? Is that your testimony?

8 A. That's not what I said.

9 Q. What's -- what's incorrect about my
10 statement?

11 A. When someone communicates with you via
12 Signal, they set the standard for what can be kept inside
13 of that conversation.

14 Q. Okay.

15 A. It's a limitation of the technology.

16 Q. I understand that. But my -- my question
17 was, there are communications or were between you and RD
18 that have been deleted?

19 A. Not true.

20 Q. So you still have them?

21 A. I do not have them.

22 Q. Because they have been deleted?

23 A. That is not true. That is a play on words
24 by you. That is not what happened. What happened is, is
25 the app limitation is that those are deleted. When

1 someone communicates with you, they set the standard by
2 which you can keep those communications.

3 Q. When did you initially contact -- or make
4 contact with RD?

5 A. End of July, I believe, early September.

6 Q. 2020?

7 A. Yes.

8 Q. Describe the -- your initial contact with
9 this person.

10 A. I was at a meeting. He walked up to me
11 and said that he was a part of antifa and he was leaving
12 it, and that it was not the same organization as when it
13 started and something to that effect. And I basically
14 glad handed him and said, I'm glad you're not a part of
15 antifa anymore. Shook his hand and told him to stick
16 around and get involved.

17 I shook probably another 100, 150 other
18 people's hands at the same time. That was the first -- I
19 think that was the first time I met him.

20 Q. How is it that -- well, just walk me
21 through the progression, Mr. Oltmann, that you shook his
22 hand at an FEC meeting in you said July or September.

23 When was your next contact with him? Walk
24 me through that progression, please.

25 A. He made a couple of attempts to contact

1 me.

2 Q. How?

3 A. Through Signal. I think -- let me -- let
4 me go back a little bit. I think through Signal. I
5 can't find any text communication from him, and I don't
6 think I gave him my email -- or my phone number. I know
7 he made a couple of -- he made a couple of attempts to
8 contact me, and I did not return his call or I did not
9 respond.

10 Q. When he attempted to contact you, what was
11 he saying?

12 A. I don't remember. I don't recall. I
13 probably get somewhere between 3 and 400 people in a
14 given week to try to contact me.

15 Q. Did you ever communicate with him via cell
16 phone number?

17 A. No.

18 Q. Via email?

19 A. No.

20 Q. Via regular text?

21 A. No.

22 Q. All the communications with RD that weren't
23 in person were through Signal?

24 A. I believe so. Yes.

25 Q. So when he attempted to contact you a few

1 times, you didn't respond to those, then what happened
2 next?

3 A. He showed up at another FEC meeting, which
4 was -- I think it was the beginning of September, to the
5 first week of September. And this time he walked up to
6 me again and said, you know, I've been trying to reach
7 out to you. I -- I can get you access to these --
8 getting in the antifa call.

9 Q. How did he know you wanted access?

10 A. I don't think he knew that I wanted access
11 or didn't want access. He had just made a statement at
12 the previous conversation that he was a part of antifa
13 and that these people that are writing things about you,
14 they're antifa members inside of -- they're antifa
15 journalists.

16 And so it piqued my interest before, but I
17 wasn't -- I was not surprised. And this time by telling
18 me he can give me access to that call, definitely piqued
19 my interest.

20 Q. This FEC meeting that you just testified
21 about, was this also in Castle Rock?

22 A. Yes.

23 Q. Are those meetings -- do you have sign-ins
24 sheets or anything that would identify who attended the
25 meetings?

1 A. I think we started to do that, yes.

2 Q. Do you still have FEC meeting sign-in
3 sheets from this time period?

4 A. No.

5 Q. Why not?

6 A. Because they're not kept. They're written
7 in papers. We wouldn't keep those -- that information.

8 Q. Well, you -- you acquire the information.
9 Do you then convert it into an electronic record?

10 A. We take the emails and convert those into
11 electronic records, yes.

12 Q. Okay. Did -- did RD provide an email?

13 A. I do not know. I did tell you that I
14 would check the logs for members for the deposition
15 tomorrow.

16 Q. All right. While you're at it, can you
17 also look at the sign-in sheets or however that's now
18 notated to see if you have information for RD?

19 MS. HALL: Charlie, just for the record,
20 he told you that he did not keep those. If anything,
21 there would be an email address. And he already
22 confirmed that he would look that up.

23 A. I will check for that information,
24 nonetheless.

25 Q. (By Mr. Cain) You said that he indicated

1 that he had some information on antifa journalists. Who
2 did he say he had information on?

3 A. I do not believe at that time he told me
4 about any one person in particular.

5 Q. Okay. What happened next with respect to
6 this guy?

7 A. He became more agitated. He contacted me
8 and told me what day that was going to happen, which I
9 don't recall the actual day. It was a pretty busy time
10 for us at FEC and a pretty busy time for us as a country.
11 I invited him to come to my office.

12 Q. Where you're sitting now?

13 MS. HALL: Objection.

14 Q. (By Mr. Cain) Is that where you -- you met
15 with him where you're sitting now?

16 MS. HALL: Objection, Charlie. I told you
17 it's not relevant and he's not answering the question.

18 Q. (By Mr. Cain) Are you going to not answer
19 my question? Did you meet with RD where you're sitting
20 now?

21 A. The purpose of this deposition being
22 remote is to protect me. I have to sit here for three
23 hours, and there is no way I'm going to disclose where I
24 am right now that could lead anybody on your side to
25 become here and do harm to me. So I will not divulge

1 where I'm --

2 Q. Mr. Oltmann, you know what, I've listened
3 to you say our side wants to do harm to you --

4 A. I am.

5 Q. -- multiple times.

6 You don't have any evidence of that, and
7 there's absolutely no reason we would want any harm to
8 come to you. I want you to be sitting there at -- during
9 trial. Okay?

10 Do you understand that?

11 A. You ask me a question; I'll answer the
12 question. You want to put your -- your
13 little -- whatever you want to call what you said, your
14 opinion, I have no interest in listening to you.

15 I will answer your questions. I'm here
16 for three hours to answer your questions. Not to be
17 badgered by some prick. So you figure out what questions
18 you want to ask me. You ask me those questions, and I
19 will answer those questions.

20 Q. Okay. Did you meet with RD there where
21 you're sitting?

22 MS. HALL: Objection. Charlie, I told
23 you, move on. He's not answering that question. You
24 already went down this road. And it's not relevant to
25 the issue of defamation where he met with this person.

1 Q. (By Mr. Cain) Let me ask you this way --
2 MS. HALL: And whether or not he's there
3 now.

4 MR. CAIN: Ms. Hall, enough.

5 Q. (By Mr. Cain) Let me ask you this: You
6 said he was agitated, and you had a meeting with him,
7 correct?

8 A. Yes.

9 Q. Describe his appearance for me.

10 A. I'm sorry?

11 Q. If I need to pick him out of a line-up,
12 describe his appearance. How tall is he? What color of
13 hair? How old is he? What race or ethnicity?

14 A. This is unbelievable.

15 Q. Describe him.

16 They can't answer your questions. They can
17 make legal objections, not speaking objections. They
18 can't answer the questions that I'm asking you. This is
19 why I wanted this in the courthouse.

20 A. You want it in the courthouse because you
21 wanted to have me arrested. You said so in -- with
22 conferral with counsel.

23 Q. Describe --

24 A. Exact words, actually. Even though in the
25 courtroom you lied to me.

1 Q. I did not say that. That's false. I did
2 not say that to your counsel.

3 MS. HALL: Charlie, I'm not going to get
4 into this during this deposition, but you did say that on
5 the phone.

6 MR. CAIN: I did not.

7 MS. HALL: Okay. Well --

8 MR. CAIN: I never said I want to get him
9 arrested. And you're wasting my time.

10 Q. (By Mr. Cain) Describe the physical
11 appearance of RD.

12 A. He's a white male.

13 Q. How old?

14 A. Under 30.

15 Q. Do you know his educational background,
16 where he went to school?

17 A. I do not.

18 Q. Do you know what he does for a living?

19 MS. HALL: Objection. Relevance.

20 Q. (By Mr. Cain) Do you know what he does for
21 a living?

22 A. I'm not going to answer that question.

23 Q. Do you know?

24 A. I'm not going to answer that question.

25 Q. Why not? This is identity of your conduit.

1 You're under a court order to answer these questions.

2 A. Oh, I'm very aware of that.

3 Q. Okay.

4 A. I'm also aware that the judge in this case
5 marched in June of 2020 in an antifa protest. I'm also
6 aware of that.

7 Q. And, in fact, you've called her an antifa
8 judge, haven't you?

9 MS. HALL: Charlie, what's the relevance
10 of this? Like, I mean, what he believes of the judge or
11 what he's done on his own time is not relevant to a
12 defamation case with your client Eric Coomer.

13 MR. CAIN: I don't think you know what is
14 relevant, and quit interrupting this.

15 MS. HALL: No. I have the ability to --

16 Q. (By Mr. Cain) Haven't you referred to --

17 MR. CAIN: No, we're going to get into
18 what is antifa and what isn't, which is highly relevant
19 to this. And he's called Eric Coomer a member of antifa.
20 We're going to talk about that.

21 Q. (By Mr. Cain) You've called the judge an
22 antifa judge, haven't you? I want to know what qualifies
23 someone to be part of antifa?

24 Why did you call the judge an antifa judge?

25 MS. HALL: Objection. Relevance.

1 Q. (By Mr. Cain) What makes someone a member
2 of antifa? That's the point of my question.

3 A. It's a pretty well-organized organization
4 for something they say isn't organized.

5 Q. Okay. But what makes someone part of
6 antifa? Are you going to answer my question?

7 You called the judge an antifa judge in our
8 case. You've referred to Dr. Coomer as a member of
9 antifa. What makes either of them part of antifa?

10 MS. HALL: Objection with regard to the
11 judge.

12 A. Eric being on an antifa call. Eric
13 putting up posts that were pro antifa, anti-American,
14 anti-police. Posting literally right after antifa put
15 the manifesto out there, the next day he posted it on his
16 social media.

17 Q. (By Mr. Cain) Anything else?

18 Marching in a rally, marching in a Black
19 Lives Matter protest, does that make someone a member of
20 antifa?

21 MS. HALL: Objection. Relevance.

22 A. I think being on an antifa call where you
23 say that somebody is not going to win, and you made sure
24 of it, probably makes you a part of antifa.

25 Q. (By Mr. Cain) We'll get to that.

1 A. Communicating with journalists, who are
2 antifa journalists, journalists that stand up for the
3 fascist/antifascist movement, would probably qualify them
4 as antifa.

5 Q. Anything else you can think of? You've
6 called the judge an antifa judge. That's why I'm asking
7 you what -- what about that would qualify -- our judge
8 would qualify her as part of antifa?

9 MS. HALL: Objection, Charlie. Move on
10 with this questioning with regard to the judge. It is
11 not relevant to your defamation case.

12 MR. CAIN: Yeah, it is. I want to know
13 what -- what makes someone antifa.

14 MS. HALL: But you keep referring --

15 MR. CAIN: Calling my client -- I'm not
16 debating with you, Ms. Hall.

17 MS. HALL: Well, then I'm going to start
18 instructing my client not to answer your question. It's
19 not relevant to your lawsuit. What is going on with the
20 judge, what he said about the judge is not relevant to
21 Eric Coomer.

22 MR. CAIN: I'm talking about antifa.

23 MS. HALL: No, you're not. You keep
24 referring to the judge.

25 MR. CAIN: I'm not asking you, Ms. Hall.

1 Ms. Hall, we're trying to figure out in your client's
2 mind what makes someone a member of antifa. He's called
3 the judge an antifa judge because she marched in a --
4 allegedly, I have no knowledge of this -- in a rally or
5 some form of a protest.

6 Q. (By Mr. Cain) What makes that -- take the
7 judge out of it. What makes someone who's involved in
8 that activity antifa?

9 MS. HALL: That's been asked and answered.

10 MR. CAIN: He hasn't answered it.

11 A. I did answer it.

12 Q. (By Mr. Cain) What makes someone, in your
13 mind, an antifa journalist?

14 A. A radical leftist that communicates openly
15 with other radical leftists that stand for antifa being
16 antifascist, who are then themselves are the racist
17 pedophiles and racists of our society. Typically white
18 extremist liberals.

19 Q. And they have to be racist and pedophiles?
20 Is that part of your definition?

21 A. This isn't a deposition.

22 Q. It is a deposition.

23 A. This is a battering session for you
24 because you don't like the fact that I call you out. And
25 I'm --

1 Q. I don't --

2 A. I'm sorry I hurt your feelings.

3 Q. I could care less about anything --

4 A. Let's talk about -- let's talk about
5 antifa and what antifa does. And let's talk about the
6 qualifications of the judge because that's what you
7 wanted to ask. So I'll talk about that.

8 MS. HALL: No, don't.

9 Q. (By Mr. Cain) No, sir. I just want
10 answers, and you're being evasive.

11 A. I'm not being evasive.

12 Q. If you can't tell me who this person is
13 that was your conduit beyond a white male under 30 with
14 the initials RD.

15 Do you have anything else going back to RD
16 that would inform me on who this person is?

17 A. No.

18 Q. You would not identify where he works.

19 A. I don't know where he works. And that
20 wasn't your previous question.

21 Q. Did you ever know where he was employed?

22 A. No.

23 Q. Do you have any employment information on
24 him?

25 A. No.

1 Q. Do you know what city he lived in during
2 the period of time you were dealing with him?

3 A. Denver Metro area.

4 Q. Do you know anybody else who knows him,
5 friends of his, family?

6 A. I've given you all the information on him.
7 That is what I'm under a court order to disclose, and
8 I've disclosed that.

9 Q. You didn't answer my question.
10 Do you know any of his friends,
11 people -- other people who know him? Family members?

12 Either you know it or you don't.

13 A. (No response.)

14 Q. I'm going to reclaim this time at some
15 point. So there's no point in you just sitting there and
16 not responding to me.

17 Do you know the answer to my question?

18 A. (No response.)

19 Q. Family members? Friends?

20 A. (No response.)

21 Q. I'm taking by your silence that you do. Do
22 you know, sir?

23 A. I know that the goal of this is to uncover
24 this individual, so this --

25 Q. Absolutely.

1 A. -- so this person is put in danger.

2 Q. Not true.

3 A. If you put the person in danger, you hope
4 to punish this person the same way that I'm being
5 punished with a court order --

6 Q. Sir?

7 A. The same way that the couple thousand
8 people that have signed affidavits across the country
9 have been punished and threatened.

10 Q. You have no evidence that we want to do
11 anything like that and nothing could be further from the
12 truth.

13 What I want to know is what happened on
14 this call, and who got you on it and who else was there,
15 which you haven't provided to anyone at this point. So
16 that's why I'm asking these questions.

17 Do you know friends or family of this RD,
18 and you're just not telling me?

19 Are you refusing to give me that
20 information?

21 A. (No response.)

22 Q. Okay.

23 A. I don't want to speculate.

24 Q. Did your counsel just provide you with
25 information? I didn't -- I couldn't hear it, but off

1 camera I want to make sure that Ms. Tubbs got that.

2 MS. HALL: I told him not to speculate.

3 THE REPORTER: I cannot hear the
4 whispering.

5 Q. (By Mr. Cain) Okay. But I'm not asking
6 you to speculate.

7 THE REPORTER: I cannot hear the
8 whispering.

9 A. He did not show up to these meetings
10 alone.

11 Q. (By Mr. Cain) Okay. Who did he show up
12 with.

13 A. I don't know.

14 Q. Describe him. Same person? Multiple
15 people?

16 A. No. The same person, yes.

17 Q. What's the name of the person he showed up
18 with?

19 A. I don't remember.

20 Q. Male or female?

21 A. Male.

22 Q. Friend?

23 A. I assume so.

24 Q. Okay. So you know he has a friend that
25 showed up at the meetings. Is that person still part of

1 FEC? Does he show up at meetings still?

2 A. He was not an FEC person, I think they
3 brought him in. I think it's just another person that
4 came with him.

5 Q. Okay. But this other individual -- do you
6 know who they are? Are they showing up at FEC meetings?

7 A. No.

8 Q. Okay.

9 A. And I'm not at many of the FEC meetings
10 currently.

11 Q. All right. So you said that -- you
12 mentioned that RD was agitated during one of your meetings
13 where you, I guess, won't identify where you were at at
14 this particular meeting.

15 But what was he agitated about,
16 Mr. Oltmann?

17 A. So maybe agitated is probably the wrong
18 word. Scared, paranoid. Wouldn't meet me for coffee at
19 a coffee shop. Would make sure that I was -- he was
20 10 minutes late. I would ask him questions about, you
21 know, who he is as a person. Typical things that I would
22 do when trying to mentor someone who I think is going
23 down the wrong path.

24 Q. Okay. And then how did this develop to him
25 getting you on an antifa call, as you define it?

1 A. I don't understand the question.

2 Q. Well, you were meeting with him. You said
3 you had coffee. He was scared and paranoid. I want you
4 to walk me through the history of -- of your relationship
5 with this person and how he got you on the call.

6 A. And the history was pretty vanilla. I met
7 with him for coffee, as I do many people. I met with him
8 at a park. Just having conversations about who he is, to
9 validate who he is, up to the point where I was on the
10 call. I think it was more for -- as much for him as it
11 was for me.

12 Q. What did you learn about him that you
13 haven't testified to during this getting-to-know-you
14 process? You said you were at a park. You learned about
15 who he is. What did you learn?

16 A. I learned that he has family members that
17 are part of antifa.

18 Q. And? Is that it?

19 A. I learned that he just wanted to do good
20 and he thought that antifa was truly doing good.

21 Q. Okay. Anything else?

22 A. I learned that he had kids.

23 Q. Is he married?

24 A. And I learned that his fear is, is that
25 his kids would grow up under the same thing that he went

1 through when he grew up, and that they would be dragged
2 into something like this that would take him down a path
3 that he couldn't get them off of.

4 Q. Did you learn whether he was married or
5 not?

6 A. He's in a relationship, yes.

7 Q. Do you know who his partner is?

8 A. I have not.

9 Q. Never met him or her?

10 A. I have not.

11 Q. All right. So this -- this
12 getting-to-know-you process occurred during what period of
13 time? The summer of 2020?

14 A. No. It happened -- it went back in time
15 and said July to September, I met with him a couple
16 times. It was a pretty busy time given all the unrest
17 that was happening in Denver.

18 Q. Okay. Then where did the idea come that he
19 would provide you access to a call?

20 A. At first he said that he didn't have the
21 information for when the call would occur. And I believe
22 he called me a couple days before the call to ask me
23 questions, and then we had the -- the call itself.

24 Now, I did attempt to -- I think I can
25 divulge this. I did attempt to gather the information

1 related to that call some months later.

2 Q. What do you mean? I don't understand that.

3 A. I attempted to contact Zoom and see if
4 they could, given a certain period of time, find out --
5 and given a certain IP address or bank of IPs -- how I
6 could recover that particular call.

7 Q. Why? Why did you do that?

8 A. To have more concrete, tie it down to the
9 actual number itself or access code that would give me
10 access to that information so that I could then subpoena
11 that information for -- access that information related
12 to this.

13 Q. And did Zoom provide any information to you
14 that was of use?

15 A. No. But it's well-documented.

16 Q. What do you mean?

17 A. It's documented. I went to someone within
18 my company and asked that person to do this research for
19 me.

20 Q. Do you have some record of the research
21 results?

22 A. I can check. I don't think so, but I can
23 check. I'm sure that there's conversations that happened
24 related to it, yes.

25 Q. All right. If you can put that on your

1 list, I'd like to get that information if it's available.

2 All right. So when -- did you -- did you
3 get a sense from RD that he had been on calls like this in
4 the past and, therefore, thought this particular call
5 would be of interest to you? Describe how, you know, that
6 came about.

7 A. Oh, at that point the only focus was
8 antifa journalists. That is the only focus I had
9 throughout the entire thing is the things that people
10 were saying about me.

11 Q. You didn't like what was being written
12 about you by certain members of the media at the time?

13 A. I don't think it was as much being written
14 about me as it was being written about FEC United.

15 Q. Okay. And who were the journalists that
16 bothered you in particular?

17 A. Be Sean Beedle, down in Colorado Springs.
18 Sean Heidi Beedle.

19 Q. Okay. Anyone else?

20 A. Yeah. Eric -- I don't know how to say his
21 last name.

22 Q. Mobich [phonetic]?

23 A. Mobich. Oh, yeah, you know him, huh?

24 Q. Anyone else?

25 A. Yeah. Kyle Clark. I don't know if Kyle

1 Clark was before or after. But I certainly know that
2 he's affiliated with antifa.

3 Q. So he too is an antifa journalist?

4 A. I guess you could call him that.

5 Q. All right. I'm not going to call him that.
6 I asked you the question.

7 A. I mean, in my opinion I would call him
8 that, yes, I would call him an antifa journalist.

9 Q. Okay. So I've heard the storey before, of
10 course, that you were concerned about these journalists
11 and what they were saying about you. So is it fair then
12 to say that your -- your interest in RD was, he was going
13 to be able to put you on a call with some of these
14 journalists who were writing bad things about you?

15 A. Yes.

16 Q. Okay. And in were any of these journalists
17 that you mentioned actually on this Zoom call?

18 A. There -- there was a couple journalists on
19 there, but they weren't doing -- and I only take this by
20 the friendliest comment related to the call. I was
21 somewhat underwhelmed by the conversations because it was
22 filled with rhetoric. But it was fascinating because of
23 the planning and the fact that they were very, very well
24 organized on how they communicated on these calls.

25 Q. All I'm asking you about right now is -- is

1 the identity of the people that were on the call itself.

2 A. I believe if you check my notes, you will
3 walk, through, and I started putting down information
4 related to who I thought was on the call.

5 Q. Okay. Let's do that, then. Let's segue
6 into that. We'll come back to how you got on the call in
7 a minute. I can't define from your notes who was on the
8 call or who was just being discussed.

9 So referring to Plaintiff's Exhibit 29,
10 your notes, who was it that you can say for a fact was on
11 the call, journalists or otherwise, besides yourself, and
12 as you claim, Mr. Coomer?

13 A. Well, the information from that call led
14 me to information about Heidi Beedle. I thought she was
15 on that call, but then again, nobody used names on the
16 call. No one used names. The only one that popped up
17 was the Bev that popped up. And I wrote that down as it
18 came up.

19 Q. Okay. You've said, I think in the past,
20 that you thought there were about 15 to 20 people on the
21 call while you were on the call; is that right?

22 A. Yes.

23 Q. Okay. Why can't -- I'm sorry. Go ahead.

24 A. Go ahead.

25 Q. So why can you not positively identify

1 Heidi Beedle being on the call, or can you?

2 A. I cannot because no one had names to
3 verify that. So the only names that came up during this
4 are the names that I wrote down.

5 Q. Well, you wrote down Heidi. Did you write
6 Ron at one point?

7 A. I suspected that that was the person that
8 was beginning to speak at the beginning of the call.

9 Q. What do you -- what do you recall her
10 saying?

11 A. The -- that particular person was talking
12 about the Colorado Springs Independent, which is why I
13 thought that was Heidi because it sounded like Heidi, but
14 I wasn't sure. So the more that that person talked, the
15 more I wrote down information related to that person to
16 hone in on that particular conversation.

17 Q. Okay. Did you ever learn subsequent to
18 this call whether it was Heidi, in fact, that was on the
19 call?

20 A. You mean did I definitively say that that
21 was him?

22 Q. Yes.

23 A. I don't think that -- I think I was able
24 to validate that he was an antifa journalist, yes.

25 Q. I'm just asking -- you did research after

1 this call on Dr. Coomer. Did you research -- do any
2 research to try to authenticate whether Heidi was on the
3 call or not?

4 A. I authenticated Beedle as being an antifa
5 journalist based on this conversation and this call, yes.

6 Q. Okay. That's a different answer to the
7 question I asked. Did you do any research --

8 A. I did -- I did do research on Mr. Beedle,
9 yes.

10 Q. Okay. As you sit here today, what level of
11 certainty do you have as to whether she was on the call or
12 not?

13 A. I don't. I don't have a level of
14 certainty. I have a level of certainty that she is an
15 antifa journalist.

16 Q. Okay.

17 A. If I had to give you a degree of
18 certainty, that degree of certainty would probably be in
19 the 70 to 80 percent range.

20 Q. I don't know the pronoun of this person.
21 He or she was on the call, you would say you're 70 to
22 80 percent certain of that?

23 A. I'm taking a wild guess.

24 Q. That's your best -- best estimate based on
25 your perception in what you've learned about Ms. Beedle;

1 is that fair?

2 A. I would say that Mr. Beedle is a pretty
3 disgusting human being, and I learned a lot about
4 Mr. Beedle.

5 Q. That's not responsive. I was saying that's
6 your best estimate based on participating in this call and
7 what you subsequently learned, you're about 70 to
8 80 percent sure that Heidi Beedle was on this call; is
9 that fair?

10 A. The basis for this call was to uncover
11 antifa journalists. During the course of this call, I
12 uncovered an antifa journalist, a person that actively is
13 an activist rather than a journalist that writes slanted
14 and defamatory articles about people of the opposite
15 political affiliation. That is what I learned by this.
16 I learned that this person is, in fact, an antifa
17 journalist.

18 Q. But that -- again, sir, that's not what I
19 was asking you. You had said -- I had asked you how
20 certain you were that she was on this call, and you said
21 you're about 70 to 80 percent certain that she was
22 actually a participant.

23 And my question is: Is that your
24 testimony? Is that a fair estimate?

25 A. That's me taking a wild guess.

1 Q. All right. From your notes, can you
2 identify anybody else -- or actually, I'm not going to
3 hamstring you to your notes. But either through referring
4 to your notes from the call or other observations, can you
5 identify anyone else who you can testify with certainty
6 was on the call?

7 A. Eric Coomer.

8 Q. We'll get to Mr. Coomer -- Dr. Coomer in a
9 minute, but excluding him, because that's obviously in
10 dispute. Anybody other than, as you say, Dr. Coomer and
11 yourself that you can identify as having been on this
12 call?

13 A. I think that they do that on purpose where
14 they hide their identities on these calls. If you'll
15 look at subsequent disclosures of antifa communication
16 across the country, this is -- what I'm telling you right
17 now about their communication on this particular call,
18 and how they spread out communication across different
19 devices and different platforms, is that they often use
20 either names -- code names or don't use any names at all
21 in order to -- in order to have those conversations as
22 anonymous as possible.

23 Q. That's an explanation, but it's not -- it's
24 not an answer to what I asked you. I said: Is there
25 anyone else on this call that you can identify with

1 certainty by name?

2 A. Eric Coomer.

3 Q. A code name or -- or anything like that. I
4 just want to know who could authenticate, besides
5 yourself, and as you would say, Dr. Coomer since you claim
6 he was on the call. But who can -- who can you
7 authenticate that was on the call so that we could talk to
8 them about what occurred?

9 A. Well, if Eric Coomer wasn't on the call,
10 why did he clean up all of his social media platforms?
11 Totally wipe the internet of his name or -- or any of
12 the --

13 Q. That's not a response to my question.

14 A. Let me finish. You asked me a question,
15 and I get to answer that question. Now, at the end of me
16 answering that question, if you want to ask me or tell me
17 that that's not answering the question --

18 Q. I didn't ask you about Eric Coomer deleting
19 anything. I asked you, who can you identify with
20 certainty was on the call?

21 A. And I answered that question with 100
22 percent certainty that Eric Coomer was on that call.

23 Q. And I already told you we're going to deal
24 with that in a minute. I want to know, other than
25 yourself, and as you claim Dr. Coomer, is there anyone

1 that you can say was on the call with certainty?

2 A. I mean, I know for certainty that other
3 people were on the call, yes. But I don't know for
4 certainty the direct identity of those people.

5 Q. So you were -- it's now a year since
6 you -- approximately, since you say this call occurred.
7 And a year later, as you sit here, you cannot identify a
8 single person other than Dr. Coomer, as you claim, and
9 yourself that was on this call; is that true?

10 A. I'm -- I'm fairly sure that of the other
11 people that were on this call, that if I had -- if I had
12 to take a guess -- and the problem with taking a guess
13 and pinpointing those people is that I did an amazing
14 amount of research on antifa journalists to find more
15 information that would corroborate the fact that they
16 were, in fact, acting as a proxy for the antifa movement.

17 So at the time this was not my focus. My
18 focus was not who necessarily is on the call. My focus
19 was on the people that were out there actively writing
20 things about FEC and others that correlated with antifa
21 and were doing so, in other words, because they were
22 politically motivated.

23 So at the time, my whole thing was to
24 un-demask antifa journalists. I used this as a catalyst
25 to do that. So to my mindset when all this occurred was

1 strictly to get as much information as possible so that I
2 knew that I could identify those people that were inside
3 of our journalist environment who are really just
4 actively antifa members that were just defaming and
5 slandering people because they didn't agree with them on
6 a political level.

7 Q. That's an explanation, but it's not an
8 answer to my question.

9 A. Well, it actually is an answer because the
10 answer that I gave you directly correlates to the fact
11 that I was looking for evidence that these were actually
12 people that were inside of the journalistic environment.
13 I found that. I used that information in order to go
14 down a path to figure out who these people are.

15 Q. You can't tell me another person that was
16 on this call, can you, other than yourself, and as you
17 claim, Dr. Coomer?

18 A. I have a pretty high degree of likelihood
19 that Mr. Beedle was on that call.

20 Q. Okay.

21 A. I have a high --

22 Q. Understood that?

23 A. -- high likelihood correlates to
24 Mr. Beedle's massive involvement in the antifa movement,
25 a massive involvement in our revolution, a massive

1 involvement in writing a Marxist manifesto herself.

2 Q. Okay. Thank you. We're building a list.

3 You have certainty with respect to two
4 individuals: Yourself and Dr. Coomer. You have a high
5 level of certainty with respect to Heidi Beedle.

6 Is there anyone else that you can identify
7 with either certainty or a high level of certainty that
8 you believe was on this call?

9 A. The interesting part about -- and if I can
10 clarify the information about Beedle. The interesting
11 part about Beedle is that she had been communicating on
12 Twitter with another individual dating back to June of
13 2020 by the name of Will Coomer, William Coomer. Back
14 into June of last year, I believe, they were
15 communicating via Twitter, William Coomer underneath,
16 Heidi Beedle on the Twitter account.

17 This has continued all the way into 2021
18 where Will Coomer, just -- I guess you could say it's a
19 coincidence by your -- by your terms -- is still
20 communicating with Heidi Beedle on Twitter.

21 So if -- if I had to just correlate those
22 two together, that would -- we've been able to do a lot
23 of research on William Coomer, and so I would say that
24 there's a high likelihood based on all that information.

25 Again, I don't want to say 100 percent of

1 the -- of the time that this the smoking gun. I think
2 that antifa members are very careful not to have smoking
3 guns as you'll see in this election, but -- although I do
4 think there are some. But I would use that as a
5 correlation to Coomer being on the call and Beedle having
6 a probability of being on that call.

7 Q. And the Coomer you're referring to, though,
8 in that -- in your last part of your answer is William
9 Coomer?

10 A. No. The last part of my answer is William
11 Coomer communicating with Heidi Beedle via Twitter, and
12 the correlation of Eric from Dominion being on that call.
13 And the fact that I had written down, first off, in my
14 notes, that Heidi Beedle is this Navy, probably inside of
15 my notes on page 1.

16 Q. Okay. You lost me with respect to the
17 William Coomer aspect. My question wasn't about the
18 Twitter communications. My question was who with a high
19 degree of certainty or certainty can you identify as being
20 on the call?

21 A. Well, Heidi Beedle has paid a lot of
22 attention to me over the last nine months and has gotten
23 into --

24 Q. No, sir. I -- I'm not asking about Heidi.
25 You've already identified her as someone. So I'm asking

1 for anyone else.

2 A. No.

3 Q. No. That's it?

4 A. I gained more information as this
5 progressed. But, no --

6 Q. Okay.

7 A. -- on this call.

8 Q. And are you saying that William Coomer has
9 some relation to Dr. Eric Coomer?

10 A. I'm not saying anything at this point.

11 Q. Do you know if -- I had understood
12 someone -- well, strike that.

13 Do you know whether he's related to
14 Dr. Coomer?

15 MS. HALL: Objection.

16 A. I don't know. I mean, I was told
17 that -- that -- that there was a relation, but I'm yet to
18 fully verify that.

19 Q. (By Mr. Cain) All right. So --

20 MS. HALL: Charlie, could we take a break?

21 MR. CAIN: Yeah, that's fine. How long
22 have we been on the record?

23 THE VIDEOGRAPHER: One hour, 19 minutes.

24 MR. CAIN: Yeah, let's -- let's take a
25 break.

1 THE VIDEOGRAPHER: Going off the record.
2 The time is 11:23.

3 (Discussion off the record.)

4 (Recess from 11:23 a.m. to 11:42 a.m.)

5 THE VIDEOGRAPHER: We're back on the
6 record. The time is 11:42.

7 Q. (By Mr. Cain) All right. Mr. Oltmann, I
8 want to kind of pick up where we left off. But before I
9 do that, I had a note here -- I looked at my Signal app
10 during the break and observed that it's phone
11 number-based. And so if -- did you say you still have
12 access to your Signal app and RD to where you can provide
13 us with his phone number?

14 A. No. I did try -- I did try to recover
15 that information through counsel.

16 Q. What happened to the information?

17 A. I believe my phone was replaced sometime
18 in the middle of my security and there were a number of
19 changes. So if someone removed you as a contact, you
20 don't have access to that information. But I went
21 through and scoured it looking for any conversations that
22 I had during that time period, and that -- at the request
23 of counsel.

24 Q. So let me make sure I understand. I know
25 there were some pictures that we were provided that looked

1 like a phone had -- had some damage to -- done to it. Is
2 that what you're referring to? You had some damage to
3 your phone?

4 A. I was asked to provide a picture of the
5 damaged phone. I was asked to provide a picture for the
6 new contract when I had the phone replaced. I replied --
7 I gave that information as a request, I think on your
8 side or the Court's side, to provide that information
9 relevant to what information I was or was not able to
10 recover on the phone.

11 Q. Okay. And I -- and you've said many times
12 you're a tech guy. I'm not. In terms of the Signal app,
13 you have that installed on your phone currently, right?

14 A. I do.

15 Q. But you weren't able to recover the contact
16 that you had for RD in order to provide us with a number
17 that -- that you were given, the actual cell number?

18 A. No. So I don't know the technology for
19 this specifically, but if somebody removes you, then you
20 will not see them in your contacts.

21 Q. And you don't have any other record of the
22 cell phone number for RD?

23 A. I was never contacted on a cell phone
24 record, no.

25 Q. Well, I know. But when you -- when you

1 associate someone on Signal, you have to -- you get their
2 cell number. They have to provide that information. So
3 at one point you had it.

4 A. I don't believe that you're correct. I
5 believe that you can use -- you do not have to use your
6 cell phone number in order to log in to Signal. I don't
7 believe that that is a requirement.

8 Q. If you wanted to contact RD now, how would
9 you go about doing so?

10 A. I have been trying. Knowing that I was
11 going to have this information, I was trying.

12 Q. Okay. What -- what efforts have you gone
13 to? When you said you've been trying, what have you done
14 specifically?

15 A. I've reached out to people that have
16 information about antifa members. I've reached out to
17 people that are deep in the researching or investigations
18 of antifa members. I've asked if they could uncover
19 information that would lead to them to have a
20 conversation with this individual, or any information
21 that I did disclose could put this person in danger.

22 THE REPORTER: I'm sorry. I'm having
23 trouble understanding and hearing the deponent. Could
24 you get closer to the phone or the computer to pick you
25 up better?

1 THE DEPONENT: All right. Is that better?
2 THE REPORTER: Yes.
3 MR. CAIN: Yes.
4 THE DEPONENT: Okay.
5 Q. (By Mr. Cain) You are muffled.
6 A. I'm trying to write while I'm talk- --
7 take notes while I'm --
8 Q. Okay. So I guess to summarize, you don't
9 have access to any information right now that
10 would -- that would put us or anyone in touch with RD,
11 true?
12 A. True.
13 Q. You've identified for us some members that
14 were on the call. We've already discussed that. You have
15 said that the purpose for being on this call was to
16 uncover antifa journalists, fair? Is that a fair
17 statement?
18 A. Yes.
19 Q. All right. And as a result of the call,
20 you uncovered Heidi Beedle as an antifa journalist, right?
21 A. I did not 100 percent confirm that, but
22 that was my -- in my notes. That was my -- that was my
23 recollection. That was my opinion of who was on the
24 call, yes.
25 Q. All right. And you mentioned two others,

1 Eric Mobich and Kyle Clark. Were either of those
2 individuals on the call, if you know?

3 A. No. They talked about them as being
4 friendlies.

5 Q. Okay.

6 A. They didn't actually talk about Kyle
7 Clark. They talked about another individual related to
8 that --

9 THE REPORTER: I'm sorry, sir. I can't
10 understand you still. Can you get closer -- I don't
11 know. Can we go off the record a minute?

12 MR. CAIN: Sure.

13 THE VIDEOGRAPHER: Going off the record.
14 The time is 11:47.

15 (Discussion off the record.)

16 (Recess from 11:47 a.m. to 11:50 a.m.)

17 THE VIDEOGRAPHER: We're back on the
18 record. The time is 11:50.

19 Q. (By Mr. Cain) Okay. This RD, was this --
20 the call -- the antifa call that we've been discussing,
21 was that the first antifa call that he arranged for you to
22 be on?

23 A. Yeah. No. Well, actually, yes, yes.

24 Q. Because you've indicated in the past that
25 you've -- you were on more than one. You infiltrated more

1 than one call, right?

2 A. Well, I said that I've infiltrated other
3 communications, yes.

4 Q. Okay. What do you mean by that?

5 A. I mean, I've been involved in -- and I
6 didn't say that I had, but we had. We had infiltrated
7 other things, other meetings, other communication, other
8 protests.

9 Q. Okay. And you're using the royal "we."
10 Who are you referring to when you say "we had"?

11 A. Other people that were involved in or
12 associated with FEC or knew ADF.

13 Q. Okay. Can you -- is there a point person
14 or a core group of people that you can identify that were
15 involved in this? By name.

16 A. I don't understand. So there's lots of
17 research being done on antifa.

18 Q. Okay. All right. Well, let me backtrack a
19 second.

20 Other than the call that we've described
21 where you -- obviously you didn't identify yourself on
22 this Zoom call in question, right?

23 A. I did not.

24 Q. My question earlier was geared towards
25 that, other calls that you were able to get on through a

1 conduit such as RD. Was this the only one?

2 A. No. The only call that I was on related
3 to this was this call. The previous time that I had a
4 scheduling conflict, I could not get on the previous
5 call. So this was the call that I could actually be on
6 at my -- you know, at my office.

7 Q. Okay. And that's -- that was the point.

8 So as far as this -- this scenario where
9 someone gets you on a call that you can monitor
10 anonymously, this is the only one that you can testify to
11 as having been on under these circumstances?

12 MS. HALL: Objection. Relevance.

13 A. I -- can you repeat the question?

14 Q. (By Mr. Cain) Yeah. I'm just trying
15 to -- you said in the past that you had infiltrated antifa
16 calls. I'm trying to find out how many other calls you
17 were on such as this one.

18 MS. HALL: Charlie -- I'm trying to -- I'm
19 trying to figure out why this is relevant to limited
20 discovery. We're here for one specific call that dealt
21 with your client, not other calls.

22 THE DEPONENT: Is that an objection?

23 MR. CAIN: No. It's a speaking objection,
24 and it's waived.

25 He's testified to this and provided

1 information on this, and I want to get an answer to my
2 question.

3 Q. (By Mr. Cain) Are there other calls or was
4 this --

5 MS. HALL: Again, it's not relevant.

6 MR. CAIN: I don't -- either make an
7 instruction, but quit interrupting my questions, please.

8 MS. HALL: I did. I'm objecting.

9 Q. (By Mr. Cain) So --

10 MR. CAIN: Okay. Make your objection and
11 then I will ask the question. He'll answer it unless you
12 make an instruction.

13 Q. (By Mr. Cain) Let's just focus on RD. Was
14 this the only call that this particular conduit got you
15 on?

16 A. Yes.

17 Q. Okay. Were there other similar calls
18 relating to uncovering antifa members besides the one in
19 question that you were on?

20 MS. HALL: Objection.

21 A. Any type of communication or ways that
22 antifa communicated that we were able to get on or be at,
23 whether it be a meeting or otherwise, we did so legally.

24 Q. (By Mr. Cain) I don't -- I don't -- I'm
25 not asking about legality at this point. I'm just asking:

1 Is there any other calls such as the one that you've been
2 describing that you were on. Either yes or no. I'm not
3 asking about whether it was legal.

4 MS. HALL: Objection.

5 A. That I was on?

6 Q. (By Mr. Cain) Yes, that you were on.

7 A. Okay. That I was on, no.

8 Q. Okay.

9 A. Personally.

10 Q. Now, going back to the antifa call, I have
11 seen various dates -- or a range of dates that this call
12 was alleged to occur. What specific date did this Zoom
13 call occur?

14 A. It happened between the mid and end of
15 September.

16 Q. Right. And so my question was,
17 specifically. We have notes from the call that are not
18 dated, correct?

19 A. Correct.

20 Q. And you've said in your affidavit that it
21 was on or about the week of September 27th of 2020. And
22 then you've said in testimony -- including just now -- mid
23 to late.

24 Why can you not provide us the actual date
25 that the call occurred?

1 A. Because it wasn't on my calendar. And the
2 only thing that I can do is get within a few days of the
3 September 26th screenshot, which is when I did the
4 information search related to Eric Dominion, Denver,
5 Colorado.

6 Q. Right. Because we have a screenshot of you
7 doing that on September 26th, right?

8 A. Yes.

9 Q. So the call obviously would have occurred
10 prior to that, based on your prior testimony, correct?

11 A. It would have, yes.

12 Q. And so your best recollection, I guess,
13 would have been that the call would have been within a few
14 days of September 26th prior to that?

15 A. That's me guessing. Yes.

16 Q. Well, that's the most likely scenario, is
17 it not, based on your recollection?

18 A. It's been a year, so I don't know.

19 Q. And you -- do you keep a calendar?

20 A. I do.

21 Q. Is it an electronic calendar or a
22 handwritten one, old-fashioned?

23 A. Sometimes a little bit of both.

24 Q. Okay. What were you doing -- what do you
25 remember doing on the date that this call occurred?

1 A. I don't. I mean, I can't go back that far
2 and give you that information. I mean, I can check my
3 calendar to see what I was doing on those dates, but
4 that's as close I can get.

5 Q. Well, have you tried to go back -- I mean,
6 has anybody asked you to triangulate the actual date? I
7 don't want to ask you about your lawyers. But has anybody
8 asked you to do that? Any of the other defendants, to try
9 to get an actual date?

10 A. No. My lawyer has asked me those
11 questions, yes, and I've gone back and done as much
12 research as I possibly can. There's a lot of moving
13 parts happening at the same time. I also ran a company
14 at the same time I was involved in building up FEC
15 United, and the same time that I was advocating for
16 people's rights in this community related to faith,
17 education, and small businesses.

18 THE REPORTER: I'm sorry. And small
19 businesses?

20 THE DEPONENT: Yes. Yes, ma'am. Small
21 businesses.

22 Q. (By Mr. Cain) All right. So as you sit
23 here today, your testimony is it would have been -- within
24 a few days is your best estimate that the antifa call
25 occurred; is that fair?

1 MS. HALL: Objection.

2 A. I'd rather not speculate, which is why I
3 said from the middle to end of September. I know it
4 happened before the 26th of September.

5 Q. (By Mr. Cain) And you can't -- despite
6 efforts in looking at your calendar, you can't recreate
7 your schedule in order to get us a specific date, true?

8 A. I've attempted to.

9 Q. The book that has your notes in it --

10 A. Yes.

11 Q. -- do you still have that book?

12 A. I do.

13 Q. Does it have other notes besides the notes
14 relating to the antifa call?

15 A. It does.

16 Q. In other words, subsequent to these notes,
17 are you able to look at any material that would help you
18 nail down the date in question?

19 A. No. My schedule is pretty tight. I'm
20 fairly busy on a daily business. It's one of the key
21 complaints that my attorneys have in me getting back to
22 them promptly.

23 Q. Okay. Back to the Zoom call. Was there
24 any video associated with this particular call?

25 A. We were not in a video set, no. We

1 weren't video'ing the call.

2 Q. Right. I understand you weren't on video.
3 But were other people on the call on video?

4 A. No.

5 Q. And the person RD, was he with you during
6 the course of this call?

7 A. For part of it.

8 Q. Okay. Explain which part he was with you.
9 Just to get you on the call?

10 A. No. He was here for part of the call.

11 Q. Okay. So you two were there in your office
12 and you started the call, and then he left?

13 A. I think he came in and out, yes.

14 Q. In and out.

15 Did he hear -- was he there during the time
16 that this conversation about Eric from Dominion occurred?

17 A. I believe so, yes.

18 Q. And since he was associated with antifa, as
19 you understood it before, did he identify for you anyone
20 else that was on the call from his -- from his own
21 knowledge?

22 A. I believe he gave me some context behind
23 this Yan guy or Yan-ni guy.

24 Q. So you think he knew him?

25 A. I do, yeah.

1 Q. All right. Anything else that you can
2 recall?

3 A. Not that I can recall.

4 Q. There's other names on your notes that we
5 didn't discuss on the first page, on Bates 205. I think
6 we've -- we've discussed everybody but Joey Camp.

7 Joey Camp was not on this call, I take it,
8 right?

9 A. I do not believe so.

10 Q. Was part of the discussion on this call
11 about Joey Camp?

12 A. Yes. At that point I had never met Joey
13 Camp, and I really didn't know who he was.

14 Q. Okay. Can you -- is it fair to say that
15 Mr. Camp was one of the -- one of the primary topics of
16 this call?

17 A. No.

18 Q. All right. And how much time was spent
19 discussing Joey Camp while you were on the call?

20 A. A few minutes probably.

21 Q. Do you remember what was said about him?

22 A. Yeah, that he's a rat. They had a lot of
23 choice things to say about him.

24 Q. Okay. A rat meaning -- meaning what? What
25 did you understand that to be referring to?

1 A. They were not talking about him in
2 endearing terms.

3 Q. And then you also have listed -- I don't
4 think we got to them -- you put rat in your notes, I do
5 believe.

6 A. Yeah.

7 Q. Help contact this Joey. So is that your
8 note to yourself to say you need to get in touch with him
9 as a result of what was said about him?

10 A. Yes.

11 Q. I mean, the idea of being an enemy of
12 antifa as a potential friend or ally for you?

13 A. It was just another point of data.

14 Q. Then you say under that note about Joey,
15 Tay, hyphen, question mark. This guy is antifa, two
16 question marks.

17 What is the -- why did you write that down?

18 A. They were talking about Tay Anderson. And
19 that -- it came up because of connection between the -- I
20 think it was PSL and antifa. I think that that's the
21 socialist movement on DSL. I think it's DSL.

22 Q. Okay. Well, what was the discussion about
23 Mr. Anderson?

24 A. Mr. Anderson was, I guess, involved in
25 organizing protests and was standing up. And I don't

1 remember the context behind it. It was just the context
2 of them bringing in someone that is a school board member
3 into the conversation.

4 Q. Did RD tell you who actually organized this
5 Zoom call?

6 A. No.

7 Q. And you don't know?

8 A. No, no. But nobody questioned -- well, it
9 doesn't matter.

10 Q. Nobody questioned what?

11 A. Nobody questioned him being on the call.

12 Q. Oh, RD. Okay.

13 Do you know whether Tay Anderson was a part
14 of this call at any point?

15 A. I can't say for certain, no.

16 Q. Were you on the call when it began?

17 A. No.

18 Q. Were you on the call when it ended?

19 A. No.

20 Q. So you don't know how long the call was in
21 total?

22 A. I can speculate. But, no, I don't.

23 Q. How -- approximately how long were you on?

24 A. 40 minutes, I believe is what I recall,
25 45 minutes. Maybe a little less, a little more.

1 Q. You -- you say in your notes, quote, Four
2 to five, close quote, training.

3 A. What page are you on?

4 Q. And then -- I'm sorry?

5 A. What page is that on? I'm sorry.

6 Q. Bates 208 at the top. I've actually
7 bookmarked that for a second.

8 These notes are not in order, are they?
9 Like in the order you wrote them.

10 A. Based on what I'm looking at, no, they're
11 not.

12 Q. Okay. In fact, what is the first page of
13 the note? Antif- -- is it -- is it 206 where you say
14 antifa call - RD?

15 A. Yes.

16 Q. Okay. So 206 is page 1?

17 A. Yes.

18 Q. What is page 2?

19 A. Page 2 is "fortify training."

20 Q. So that's --

21 A. The next one is 208.

22 Q. 208 is page 2.

23 A. Then page 3 is, Contact this Joey. And
24 then page 4 is, Who is.

25 Q. Okay. So then when you got on your first

1 note was, Who is this woman? That's referring to Heidi
2 Beedle. When you got off, your last note was Jojo, Joey
3 Camp, media, question mark. Hit this guy.

4 Is that a reference to contacting him?

5 A. No. I think it was a reference to them
6 wanting to go after this guy.

7 Q. Okay.

8 A. Somebody referred to him as Jojo and
9 somebody referred to him as Joey Camp. And at that
10 point, I didn't know who Joey Camp was.

11 Q. But you do now?

12 A. I do.

13 Q. Actually, while I'm thinking about it,
14 let's -- I just received this -- I'm going to see if I can
15 share my screen with you because this is not -- it's
16 probably something that you have in front of you.

17 This is Plaintiff's Exhibit 131. This was
18 posted, I think yesterday, on GAB by Joey Camp. And it's
19 a two-page document.

20 Did you see this posting, Mr. Oltmann?

21 MS. HALL: Charlie, we don't see anything
22 on the screen.

23 THE DEPONENT: I see nothing on the
24 screen.

25 MR. CAIN: Well, let's see.

1 MR. BURNS: For what it's worth, Charlie,
2 I was able to see it.

3 THE REPORTER: Who just said that?

4 MR. BURNS: John Burns.

5 THE DEPONENT: I think you've made me the
6 spotlight, so everyone else can see it, but I can't see
7 it. So hold on a second. No. Well, I can't see it.

8 MR. CAIN: Let's do this. I don't want to
9 waste time on this. Let's go off the record for a
10 minute.

11 THE VIDEOGRAPHER: Going off the record.
12 The time is 12:09.

13 (Recess from 12:09 p.m. to 12:17 p.m.)

14 THE VIDEOGRAPHER: Okay. We're back on
15 the record. The time is 12:17.

16 Q. (By Mr. Cain) All right. Mr. Oltmann,
17 before the technical issues, we were talking about Joey
18 Camp that is referenced in your notes. And then I had
19 marked Exhibit 131, tried to share my screen, and
20 that -- I understand you have it actually in front of you;
21 is that true?

22 A. I do.

23 MR. CAIN: And for the record, Exhibit 131
24 was posted on GAB. It hasn't been produced by any
25 parties. We were made aware of it last night. And it

1 purports to be a posting from Joey Camp at Joey Camp
2 2020.

3 Q. (By Mr. Cain) Do you recognize -- well,
4 let me ask it a little different way. Do you follow
5 Mr. Camp on GAB?

6 A. No.

7 Q. Have you ever seen this posting before now?

8 A. I have not.

9 Q. Are you in communication with Mr. Camp?

10 A. From time to time, yes.

11 Q. All right. Well, this may be helpful or it
12 may not be since you hadn't seen it, but he makes some
13 statements that I wanted to ask you about.

14 At the beginning of this document, he says,
15 When my team preserved material from Eric Coomer, we did
16 so because of his connection to antifa, not because of his
17 connection to Dominion, which we didn't even know existed
18 before --

19 Do you know what he's referring to --

20 MS. HALL: Objection.

21 Q. (By Mr. Cain) -- with that comment?

22 MS. HALL: I apologize, Charlie.

23 Objection. Calls for speculation.

24 A. No.

25 Q. (By Mr. Cain) In other words, have you

1 received material regarding Eric Coomer from Mr. Camp or
2 his team?

3 A. I don't believe so, no. I have gotten
4 emails from Joey, but that's about it.

5 Q. Do any of those relate to Dr. Coomer?

6 A. I do not believe so. If they did, they
7 would be in the discovery request.

8 Q. Then on the bottom of -- well, actually,
9 let me ask you one other thing.

10 In this posting, in the middle of the
11 posting, there's a paragraph that says, During the phone
12 call with Eric Coomer on the line with other known members
13 of antifa nationwide, one of the antifa members spoke
14 about finding and killing me. That was end of last year.

15 Now, as far as you know, Mr. Camp was not
16 on the call that you have been describing, right?

17 A. Not -- not that I'm --

18 MS. HALL: Objection. He can only answer
19 this question if it doesn't deal with attorney-client
20 privilege.

21 Q. (By Mr. Cain) Yeah, I'm not asking if your
22 lawyers told you anything about this. It's just
23 like -- my question was: As far as you know, Mr. Camp was
24 not on this call, correct?

25 A. Correct.

1 Q. Have you spoken to Mr. Camp about what
2 occurred on this call?

3 A. No.

4 Q. So you don't have any idea where he's
5 getting this particular information from; is that fair?

6 MS. HALL: Objection. He can only answer
7 that question if it does not relate to attorney-client
8 privilege.

9 Q. (By Mr. Cain) And that's fine. If this --

10 A. On this --

11 Q. No, no, I don't -- not -- not if it's just
12 repeating something your lawyer said. I'm interested in
13 your testimony, not theirs.

14 A. Okay. Can you repeat the question?

15 Q. Probably not.

16 MR. CAIN: Laurel?

17 (The last question was read.)

18 A. Correct.

19 Q. (By Mr. Cain) And was Mr. Camp or
20 anyone -- any team members, as he calls them -- did they
21 provide you with Dr. Coomer's Facebook pages?

22 A. No.

23 Q. The screenshot of the pages?

24 A. No.

25 Q. Because you -- let me actually back up for

1 a second.

2 You provided -- I think it was counsel for
3 Sidney Powell and Defending the Republic, you provided
4 them with sworn testimony on or about August 18, I
5 believe, of this year, correct?

6 A. Yes.

7 Q. And part of -- and that's testimony that,
8 as you sit here today, you were under oath, you swore that
9 it was true, and that testimony is true and accurate,
10 correct?

11 A. Correct.

12 Q. I don't want -- I don't want to repeat or
13 reinvent anything from it.

14 But one of the things that you refer to is
15 getting screenshots of Dr. Coomer's Facebook pages. And
16 as I appreciate your testimony, those screenshots did not
17 come from Joey Camp; is that fair?

18 A. That is fair.

19 Q. All right. So who did -- who did you get
20 the screenshots of the Facebook pages from?

21 A. I got those screenshots from someone who
22 had access to that legally.

23 Q. Yeah. And you've said that.

24 A. Can we take a quick break? I need to use
25 the restroom. I just drank a bunch of water.

1 Q. Well, let me -- let me ask you a follow-up,
2 then we can take the break, it relates to the question
3 that I just asked you.

4 A. All right. I'll answer it.

5 Q. The -- the question was whose -- who gave
6 you -- this is along the lines of the other question about
7 the conduit, RD -- who is the person who gave you access
8 to the Facebook pages by giving you screenshots?

9 A. Someone that had legally -- legal access
10 to those screenshots.

11 Q. I'm asking you for the name.

12 A. I won't give you the name. I will not
13 answer that question.

14 Q. You've been ordered by the Court to answer
15 that question.

16 A. I understand. I also understand the
17 consequences that come from not answering that question.

18 Q. What's the basis for refusing to answer the
19 question?

20 A. Eric Coomer's lack of control, and his
21 ability to and desire to hurt those that speak out
22 against him.

23 Q. How has --

24 A. There's -- let me -- let me actually
25 finish that. There's also another problem in that that

1 person is not protected under any protection order. And
2 at the point that he would be protected under a
3 protection order, I would seek that that protection order
4 also prohibit Eric Coomer from having access to that
5 information as well.

6 Q. In the hearing, we stipulated that the
7 protective order would be covered by the Facebook conduit
8 as well. So they are protected, and that's our position
9 and stipulation. So --

10 A. It is my position that that has not been
11 stipulated. It is also my position that having Eric
12 Coomer have access to this individual would be a danger
13 to this person, given Eric Coomer's history with antifa.

14 Q. Sir, you're -- I just want to make sure
15 that you understand what you're doing. The Court has
16 ordered you to provide that information to us. And -- and
17 you are aware that there's an order in place to that
18 effect, right?

19 A. I also understand that on --

20 Q. But just answer that question first. Can
21 you answer that?

22 A. I'm answering that question for you right
23 now. On December 8th, Mr. Coomer said specifically that
24 those posts were fabricated. He furthermore said that he
25 had no -- never had any sort of desire to push out

1 anything that would be politically motivated or biased.
2 That was, I think, paragraph 3.

3 So as far as Mr. Coomer is concerned, I
4 fabricated those. Now, you want me to come forward with
5 the person that gave me access to that information. Even
6 given the history of Mr. Coomer even as -- as recently as
7 a couple months ago where he got in a bar fight.

8 So, I mean, you want me to give you
9 information related to this individual to a person who
10 has a history of flying off the -- off the handle, and I
11 don't think that that is appropriate. So given that, I
12 understand the consequences. I understand we'll go back
13 in front of the Court. I will not divulge that
14 information unless I feel that that person is safeguarded
15 against Mr. Coomer specifically.

16 MS. HALL: Charlie, and I'm going to at
17 this point say we need to take a break and go off the
18 record.

19 MR. CAIN: I'm not agreeing to it. I
20 mean, you can do what you want, but I want to get to the
21 bottom of this.

22 MS. HALL: And I understand -- there's no
23 question posed, and he asked for a break about four
24 questions ago. So I'm asking for a break.

25 A. Just a quick break just to use the

1 restroom, and I'll be right back.

2 Q. (By Mr. Cain) You're going to do it no
3 matter what. I'm just saying I'm in the middle of a
4 topic, and so I'm not -- it's not an agreed-upon break.

5 MS. HALL: Okay. Break. We'll come back
6 in a few minutes. Thank you.

7 THE DEPONENT: I'm just going to use the
8 restroom. I'll be right back.

9 THE VIDEOGRAPHER: Going off the record.
10 The time is 12:26 p.m.

11 (Recess from 12:26 p.m. to 12:34 p.m.)

12 THE VIDEOGRAPHER: We're back on the
13 record. This is the beginning of Media Number 2. The
14 time is 12:34.

15 Q. (By Mr. Cain) Okay. Mr. Oltmann, before
16 the break, I was asking you about the access to the
17 Facebook pages. It wasn't an agreed break. I don't want
18 to know if you -- the substance of your conversations, but
19 did you confer with counsel during the last break?

20 MS. HALL: Objection.

21 A. I didn't, no. I went to the bathroom like
22 I told you I was going to.

23 Q. (By Mr. Cain) So you didn't confer with
24 counsel?

25 A. I did not.

1 Q. Having had time to visit the restroom, I'm
2 going to give you one more shot. Are you going to respond
3 to my question as to who the person was that gave you
4 access to Dr. Coomer's Facebook pages?

5 A. No. Put it in the protective order, and I
6 feel that that person is protected, then I may be
7 compelled to release that information. But given, again,
8 the irrational nature of Mr. Coomer, I'm not -- I'm not
9 prepared to do that right now.

10 Q. All right. Well, I'll bite on -- and I
11 don't agree with you, I do believe it's protected. We've
12 already stipulated that it's protected and it's been
13 ordered. So --

14 A. That doesn't stop -- that doesn't stop
15 Eric Coomer from being on this call right now and for him
16 getting access to that information.

17 Q. Right.

18 And you're speculating, though, as to what
19 anyone would do with that information.

20 A. I'm not speculating. I'm using -- I'm
21 using the habits and behavior of Mr. Coomer himself in
22 order to dictate what I think he will do in the future.

23 Q. Okay. I'm going to burn a minute on this
24 because we're going to have to address this with the
25 Court.

1 You said because of Dr. Coomer's lack of
2 control, you mentioned a bar fight. What specifically are
3 you saying presents a danger to the Facebook page person
4 by Dr. Coomer?

5 A. His -- his own writings that date back all
6 the way back to 1996. His involvement with the
7 skinheads. His previous addiction to heroin. His
8 multiple arrests for DUI. His inability to control
9 himself, comments and things that he's done in the past.

10 I mean, he's just a wrecking ball.
11 Writing stuff publicly about how he abused his wife at
12 the time. I didn't write these things, he did. And
13 those aren't the writings of someone who is a sane
14 individual. So I used his own writings and the things
15 that he wrote in order to come to a conclusion on what
16 he's likely to do to someone else based on his
17 recklessness with his own life.

18 Q. This -- this individual, as you understand
19 it -- but you also mentioned a bar fight. What does that
20 have to do with this?

21 A. I mean, you have a bar fight in the middle
22 of all of this. I mean, I don't know. I -- I don't --

23 Q. Who told you he had a bar fight?

24 A. Someone in the -- someone in the Salida
25 area.

1 Q. You mentioned, I think in the past, maybe
2 it was on one of your shows, that Dr. Coomer you said
3 assaulted two individuals. Is that -- is that what you're
4 referring to?

5 A. That is the information that was provided
6 to me, yes.

7 Q. Okay. So do you know whether or not
8 Dr. Coomer was charged with assault in this alleged bar
9 fight?

10 A. I do not believe he was.

11 Q. Right.

12 And, in fact, do you know whether the other
13 individuals involved in this incident were charged
14 criminally?

15 A. I do not know that as well.

16 Q. You don't have any firsthand knowledge of
17 anything related to a bar fight in Salida, do you?

18 A. I hired a private investigator through
19 counsel.

20 Q. Right.

21 Is Dr. Coomer under surveillance right now?

22 MS. HALL: Objection.

23 A. No.

24 Q. (By Mr. Cain) Has he been in the past?

25 MS. HALL: Objection.

1 A. I don't know what my attorneys have done
2 in order to garner information about Mr. Coomer.

3 Q. (By Mr. Cain) I'm not asking you about
4 your attorneys. I'm talking specifically about whether
5 you have him under surveillance.

6 A. I personally do not have him under
7 surveillance, no.

8 Q. Have you ever sent someone to Dr. Coomer's
9 house to surveil him?

10 A. No. Somebody volunteered to go by his
11 home to see if he was there because I was asked by
12 someone else if I'd seen Eric Coomer. Lots of people
13 reached out to me all over, giving me information about
14 Mr. Coomer.

15 Q. Can you see my screen?

16 A. I cannot. You have to hit the share
17 screen button at the bottom.

18 Q. I'm screen sharing. In the exhibits, it's
19 Exhibit 104. You can't see it, I guess, because of your
20 setup, but it's on the screen.

21 A. Hold on. Let me go to Exhibit 104.

22 Q. It was produced by Mr. Hoft.

23 A. Okay.

24 Q. It comes from the phone number
25 303-667-5105. Is that your phone number?

1 A. It is.

2 Q. Is that your text to him, I sent someone to
3 his house and no sign of him?

4 A. I don't have that text in any of my texts.
5 And I don't understand the context of this.

6 Q. I asked you, Have you sent people to his
7 house to surveil him? You said, No, that you had
8 volunteers.

9 Did you send this text and did you send
10 someone to Dr. Coomer's house in November of 2020?

11 A. I did not send someone to his house. I
12 sent someone to see if he was there. Because they called
13 me and said, I'm here. I can check and see if he's at
14 his house.

15 Q. Okay. Who did you send to his house?

16 A. It was a guy that lives in Salida that
17 reached out to me via Signal and said I live in Salida.
18 There's a lot of really bad people that live here. Those
19 are his exact words. How can I help?

20 Q. Okay. And my question is: Just like all
21 these other questions that you're not answering, who is
22 this person?

23 A. I've answered every single one of your
24 questions.

25 Q. Who is the individual that you sent to

1 Dr. Coomer's house? What's his name or her?

2 MS. HALL: Objection.

3 Q. (By Mr. Cain) Who?

4 A. His name is Dave.

5 Q. Last name?

6 A. I actually don't have his last name.

7 Q. Oh. Convenient.

8 MS. HALL: Charlie, we don't need the side
9 comments.

10 Q. (By Mr. Cain) All right. Dave in Salida,
11 you sent to Dr. Coomer's house in November, or at least he
12 volunteered to do it, right?

13 A. He actually said that he would go by
14 there.

15 Q. Is this the same person who provided you
16 information about some so-called bar fight?

17 A. No. It was a private investigator that
18 got that information.

19 Q. So did you send this text or not on
20 Exhibit 104?

21 A. I'd have to see the text in order to see
22 that, if I did or didn't.

23 Q. The text is Exhibit 104, sir. It's in the
24 Exhibit Share. It's a one-liner. It has your phone
25 number on it, you testified to, and it says, I sent

1 someone to his house and no sign of him.

2 MS. HALL: Charlie, you have cherry-picked
3 one sentence. This thread shows that there's 14 text
4 messages.

5 A. Where are the rest?

6 Q. (By Mr. Cain) I'm not going to ask about
7 the rest. I have limited time. I want to know the answer
8 to my question. Did you send this text or not?

9 A. Well, I can't see the context of this
10 text. I don't have this text in my possession, because
11 when my phone was replaced, that did not go with it. So
12 if you can show me the rest of the text, I can tell you
13 whether or not I sent it in the context of --

14 Q. This is what I have. You can go back and I
15 guess talk to Mr. Hoft and review the records with your
16 counsel.

17 My question is: Did you send the text? As
18 you sit here, do you know or not?

19 A. I don't know. I mean, I'll assume that I
20 did if it came from Mr. Hoft, but I don't know. I don't
21 have this text in my possession.

22 Q. You talked about Dr. Coomer lacking control
23 and that's why you're not telling me the Facebook conduit.

24 I'm going to show you what's been marked
25 previously as Exhibit 46. This is a Parlor post. You --

1 I'm sharing my screen, but you can't see it, so I guess
2 this is for the benefit of everyone else.

3 Do you have that up?

4 A. Yeah. What day was this?

5 Q. Does it matter?

6 A. Yeah.

7 Q. I don't know. You sent it, didn't you?

8 A. I did not send that. That was what's
9 called an echo.

10 Q. Okay. Tell me what that is.

11 A. An echo is where you share somebody else's
12 post, and you can add your own thing to it.

13 Q. Okay.

14 A. But I do --

15 Q. I'm sorry. Go ahead.

16 A. I do believe that when your family gets
17 threatened, when you have to surround your bed with metal
18 plates because you're afraid someone is going to come
19 kill your family, and you have to higher personal
20 security detail when people send you powder in the mail,
21 when people come to your house with a gun, those are all
22 things -- by the way, I didn't attack Dominion. I went
23 after the credibility of Eric Coomer and his connection
24 to the election fraud based on his own words. Right?

25 So that happened within a couple of days

1 of -- of me actually coming out that Monday. So I
2 didn't -- you don't cut the tongue out of the person
3 that's lying. You cut the tongue out of the person who's
4 telling the truth.

5 When you get attacked with such -- with
6 such vitriol, you have a tendency to get really pissed
7 off, especially when your kids and your wife are in
8 danger. So, yeah, emotions fly high.

9 So I don't know when this was written. My
10 guess is that the top section was written
11 somewhere -- somewhere after or before he put up a post
12 related to the fact that those posts were manufactured.

13 Q. Okay. You don't remember the con- -- the
14 circumstances that caused to you put this post up?

15 A. I'm sure it was anger.

16 Q. Okay.

17 A. I'm sure it was written out of anger.

18 Q. You're not denying that this is your post,
19 are you?

20 A. Well, I don't -- I don't know because I
21 don't have that post anywhere in any of the posts that I
22 have on Parlor. It does not exist.

23 Q. Okay. Well, we were able to get it from
24 Parlor, obviously. Are you denying that you sent --

25 A. Hold on a second. You got this from

1 Parlor?

2 Q. Yes.

3 A. You said you got this from Parlor. You
4 got this from Parlor. So Parlor gave you this post?

5 Q. No. It was posted to your Parlor account.

6 A. Well, I went to Parlor and asked them if I
7 could get a record of my previous posts that did not show
8 up, and they denied me.

9 Q. Are you denying that you posted this, yes
10 or no?

11 A. I don't know if I posted it. To me,
12 something like that would be an echo. It would not
13 be -- an echo is where you basically repost somebody
14 else's post.

15 Q. Okay. So did you repost -- when you say,
16 I've been busy doing 15 interviews in the last two days,
17 are you saying someone else posted that and then you just
18 reposted someone who had been doing 15 interviews in the
19 last two days?

20 A. No, no, no. You don't understand how
21 Parlor works. So you'll repost the post, which is a
22 picture, and then above it you just put your own -- your
23 own stuff into it.

24 Q. Okay. So the picture was posted, and you
25 grabbed the -- the screenshot. This is of Dr. Coomer's

1 house, isn't it, in Salida?

2 A. I think so. I've never been there.

3 Q. Okay. That was your understanding, though,
4 when you echoed that picture?

5 A. Sure. If I did it, yeah.

6 I've never -- I've never seen this post.

7 Q. Well, you typed it, didn't you?

8 A. Again, I went back in Parlor and I don't
9 have any access to any of those records. It's kind of
10 like the stuff with YouTube. So you can tell me that I
11 posted this, but I can't find it anywhere.

12 Q. Well, do you remember doing it? Do you
13 remember saying, So it's up to you, blow this shit up.
14 Share. Put his name everywhere. No rest for this
15 shitbag. Eric Coomer. Eric Coomer. Eric Coomer. This
16 shitbag and the corrupt ass hats in Dominion voting
17 systems must not steal our election and our country.
18 Eric, we are watching you.

19 You don't remember typing that?

20 A. No. But it's possible that I did type it.

21 Q. You did, didn't you?

22 A. I just answered your question.

23 Q. And you wanted people to go to his house.
24 That's why you reposted -- or echoed that picture?

25 A. You want to restate your question?

1 Q. Yeah. What do you mean by "blow this shit
2 up"?

3 A. I'm not even sure I wrote it.

4 Q. So you're not standing by this?

5 A. I can't find it anywhere at Parlor. You
6 said you got it from Parlor, yet conveniently I can't go
7 to Parlor and get any posts previously. Nor are you
8 willing to give me the date that this was supposedly
9 posted.

10 Q. Did you delete this post?

11 A. I did not. I've deleted nothing.

12 Q. You're under oath, sir.

13 A. Unlike your client. Unlike your client, I
14 have deleted nothing.

15 Q. Including the Facebook video that you took
16 while you were in Grand Junction the other day that you
17 deleted?

18 A. What do you mean I deleted? I didn't
19 delete it.

20 Q. Yeah, you did. It was taken down.

21 A. That's not true.

22 Q. Who took it down?

23 A. It was never taken down.

24 Q. So that Facebook -- you're actually on
25 record saying you had to delete it.

1 A. You cannot be this stupid. Maybe you are.
2 Maybe you don't use social media. But all's I have to
3 do, and all's Eric had to do on all of those posts that
4 he deleted was change the settings so that they were not
5 public, and that he was the only one that could have
6 access to them. So that's what I did. I preserve
7 everything. And you're the one that came out and said
8 that you preserved them as well.

9 Q. Oh.

10 A. So you want to have a debate about your
11 client, we can have a debate about your client. If you
12 want to ask me questions related to your client and
13 his -- and whether or not he was on that call, whether or
14 not he was a part of election fraud, you know, we can
15 just starting mounting up the evidence. I've been
16 through all your photos and exhibits.

17 So if you'd like to ask me questions about
18 those, I'm prepared to answer those. But this subjective
19 stuff that you want to throw in the middle of it and ask
20 me questions about things that either are not relevant or
21 not true, I'm not going to sit here and stand for it.
22 You can bully someone else. You're not going to bully
23 me.

24 Q. Are you through?

25 A. Are you?

1 Q. Nope.

2 A. Then let's go.

3 Q. So you said online that you took down the
4 video the other day from Grand Junction.

5 A. Yes.

6 Q. Okay. So where you're quibbling with me is
7 deleting it versus taking them down?

8 A. That's what you said.

9 MS. HALL: And, Charlie, how is this
10 relevant? What is this have to do with your client Eric
11 Coomer? Does the video have something to do with your
12 client? Because if not, please move on.

13 MR. CAIN: It's my time, Counsel.

14 MS. HALL: Then we'll sit here and you can
15 stare at my client, because the questions are not
16 relevant. You're going beyond the scope of limited
17 discovery. And you've done this with all of the
18 defendants, and I'm not cool with it anymore.

19 MR. CAIN: You've got intentional -- well,
20 first of all, I'm not going to debate you because it's a
21 waste of time. He testified that my client lacked
22 control. I've got an intentional infliction claim. And
23 your client is unwilling to own up to what he posted on
24 Parlor as Exhibit 46.

25 A. No. You're not asking me questions. I

1 will answer those questions. When you purposely lie to
2 me, as you have to the judge and in this case, which you
3 have done, then I'm going to correct that.

4 You said that I deleted those posts. Your
5 words, not mine. I did not delete those posts. I made
6 them private. There's a difference between making
7 something private and preserving those things and
8 deleting them. I did not delete them.

9 Q. (By Mr. Cain) You took them down. Then if
10 that's the issue that you have, then I stand corrected.

11 MS. HALL: Charlie, he did not take them
12 down. He just told you he made the post private. So
13 that means you and all of your team and all of your
14 experts and everything that you're doing to follow my
15 client 24 hours a day can no longer see that. It is
16 still on his Facebook page. If you are friends with Joe
17 Oltmann, you can go on his Facebook page --

18 THE DEPONENT: No, you can't. No.

19 MS. HALL: -- and see it.

20 THE DEPONENT: No, but I'll show it to
21 him.

22 Q. (By Mr. Cain) All right. I'm going to
23 move on. I can -- I guess what I can conclude from this
24 is that it's possible that you posted an echo of a picture
25 of Dr. Coomer's house and you wrote these words, but you

1 won't confirm that for me?

2 A. There you go. There's my video. See,
3 this is Facebook. See that? That's the video you said I
4 took down. It's still up on Facebook.

5 Q. That's the video you said you took down.

6 A. I'm sorry?

7 Q. That's the video you said you took down.

8 A. No. Okay. Anyway --

9 Q. You're -- you're starting -- well, I'm not
10 going to comment.

11 What we'll do is, I guess, move on to --

12 A. It's a good idea.

13 Q. -- to another topic.

14 Actually, you know what? I'm going to take
15 a bathroom break.

16 MS. HALL: Oh, we object, Charlie.

17 THE DEPONENT: No, we don't. Stop it.

18 Stop. Please stop. Charlie, take a bathroom break. Do
19 you want a bathroom break, seriously?

20 MR. CAIN: Yeah. We're going to go off
21 the record because we've got limited amount of time and
22 we've wasted a lot of it. And I need to kind of organize
23 what I'm going to cover with you because I suspect your
24 lawyers are not going to agree to go past three hours
25 today.

1 THE DEPONENT: They may not agree but, I
2 mean, obviously, I --

3 MS. HALL: Sure.

4 MR. CAIN: Let's go off the record.

5 THE VIDEOGRAPHER: Going off the record.
6 The time is 12:55.

7 (Recess from 12:55 p.m. to 1:02 p.m.)

8 THE VIDEOGRAPHER: We're back on the
9 error. The time is 1:02.

10 Q. (By Mr. Cain) Mr. Oltmann, since we have
11 45 minutes, I'll probably jump around a little bit. I
12 like to call it the lightning round.

13 But before I get off on some topics, I was
14 informed by one of our lawyers that the Parlor post was on
15 or about December 5th, which would have been before they
16 took the Parlor down and I think there was some loss of
17 data.

18 Does that help you in terms of your
19 recollection as to whether you posted that echo?

20 A. No, because once I saw this post, which
21 I've seen before, I went back to Parlor to try and
22 recover some of the information on Parlor to see if I had
23 posted that, in fact. And I could find no record of it,
24 not at Parlor.

25 But again, I guess that when the tech

1 giants decided that they were going to sensor half of
2 America, they in essence deleted history and part of that
3 is the stuff that was up on Parlor.

4 Q. All right. So did anybody else in December
5 of 2020, did anybody else have access to your Parlor
6 account besides yourself?

7 A. I'm not sure I understand the question.

8 Q. Well, someone posted this from your Parlor
9 account. The point of my question is: Did someone else
10 have access? Could someone else have posted this?

11 A. Well, I can't authenticate that post. I
12 mean, that post doesn't show that there's any comments.
13 That post doesn't show that there's any -- it doesn't
14 show anything. It doesn't look like what Parlor looks
15 like today, which is the reason why I went back to Parlor
16 to ask them if this is a post that they could recover for
17 me.

18 Q. And it's your sworn testimony that you
19 don't recall -- or you can't recall having actually made
20 that post?

21 A. No. But I've called Eric Coomer a shitbag
22 numerous times.

23 Q. Okay. So you stand by the content. It's
24 just you don't know if that's actually your post?

25 A. I stand by that comment.

1 Q. All right. So let's -- let's talk a little
2 bit about -- we talked about the antifa call, and your
3 conduit has been identified as RD., and that's essentially
4 it. We've talked about Facebook. I want to follow-up on
5 the Facebook question now.

6 You -- when you got this -- the original
7 screenshots from Dr. Coomer's Facebook account, were you
8 located at that elk hunt home that you had referred to in
9 some of your prior testimony?

10 A. Yes.

11 Q. Okay. So just help me a little bit about
12 the timeline. You had testified that you were -- you had
13 this epiphany when you were at this elk hunt. This would
14 have been November 6 of 2020; is that correct?

15 A. I never had an epiphany.

16 Q. Okay. Well, I don't mean to -- whatever it
17 was, on November 6th is when you started looking back at
18 Dr. Coomer as a result of an article that you read; is
19 that fair?

20 A. Correct. Correct.

21 Q. And that's why you were out elk hunting, I
22 think in New Mexico; is that right?

23 A. I was not elk hunting in New Mexico.

24 Q. Okay. What were you doing?

25 A. I was elk hunting.

1 Q. Okay. Where were you?

2 A. In Colorado.

3 Q. All right. And in terms of getting access
4 to the Facebook post, how did you go about actually
5 getting that data?

6 A. Somebody gave me access to it.

7 Q. Okay. And the somebody is the person
8 you're not going to reveal, correct?

9 A. I'm not going to reveal that person
10 because Eric Coomer is on this call, and the subject is
11 not subject, thus, I can see to the protection order by
12 giving you that information.

13 Q. Was it -- well, I'm not going to give you
14 too many names. Was it Ryan McBride?

15 A. I -- I am not going to disclose who the
16 person is.

17 Q. Do you know Mr. McBride?

18 A. I'm not going to disclose -- yes, I do.

19 Q. And you're not going to tell me whether it
20 was him that gave you access?

21 A. I'm not going to tell you -- I'm not going
22 to tell you who gave me access.

23 Q. Okay. Was November 6th the day that you
24 first received screenshots from the Facebook page?
25 November 6.

1 A. Yes.

2 Q. Okay. And had you already been talking to
3 one of Dr. Coomer's Facebook friends about getting access
4 to his Facebook page prior to that point?

5 A. No.

6 Q. Did you know -- well, strike that.

7 Had you had access to Dr. Coomer's Facebook
8 account prior to November 6?

9 A. No.

10 Q. Walk me through the steps on November 6th
11 that you took in order to get access.

12 And I understand you're not going to tell
13 me the names -- or name, but -- and I don't agree with
14 that, obviously. But just kind of walk me through how you
15 were able to do that.

16 A. Okay. Repeat your -- is that a question
17 or what --

18 Q. Yes. Walk me through how you got access to
19 the Facebook page.

20 A. Somebody sent me the Facebook post.

21 Q. I get that.

22 You must have called someone. Tell me --
23 tell me how it came about.

24 A. I reached out to numerous people to see
25 who'd be willing to give me information.

1 Q. Okay. But specifically Facebook
2 information. Why did you think Facebook might have
3 information on Dr. Coomer?

4 A. I didn't. I wanted to validate the
5 information that I had previously.

6 Q. So you just started calling or reaching
7 out, as you said, to various people to see if they could
8 get you access to his Facebook?

9 A. I started doing research on the 6th to get
10 access to information that would have corroborated the
11 information that I had previously going back to
12 September.

13 Q. Okay. And then how did you -- did you find
14 someone in your -- in your investigation who told you,
15 Hey, I can get you access to the Facebook account?

16 A. No. I just started doing research.

17 Q. Okay. You're being evasive. I'm trying to
18 get --

19 A. Actually, that's exactly what I did. I
20 started doing research. I started doing research on
21 social media accounts. And was able to uncover Instagram
22 account, Twitter account that had been previously
23 deactivated. A Facebook account that was not
24 deactivated.

25 I started looking at pictures that were

1 publicly available of people that were connected to those
2 people, and looked to see if there was a 2 degree
3 separation of Eric Coomer and other people that I could
4 get access to that information.

5 Q. And so you found through looking at -- or
6 doing that research, someone that you recognized as a
7 friend of Dr. Coomer?

8 A. Not right away, no.

9 Q. Well, you got the information on the 6th,
10 right? You were able to get screenshots that day,
11 correct?

12 A. Yes. Some of them on that day, yes.

13 Q. All right. And so how did you receive
14 those? How were they transmitted to you?

15 A. Signal. I believe Signal, yeah.

16 Q. And same thing with -- well, were all of
17 the Facebook pages sent to you via Signal?

18 A. Again, the best I can recollect. I don't
19 have access to my previous phone content.

20 Q. Is the person who gave you the Facebook
21 pages still a contact on your Signal account?

22 A. I haven't looked at it, but probably.

23 Q. Take a look real quick. I want to know.

24 THE REPORTER: I'm sorry. I didn't
25 understand.

1 THE DEPONENT: I just have to keep going
2 backwards in time.

3 Q. (By Mr. Cain) If you're not going to find
4 it, I don't have time. Certainly don't stall the process.

5 A. You asked me to look for it. I'm looking
6 through every conversation that I've had.

7 Q. All right. Well, then we'll go off the
8 record and you can do it off the record.

9 THE VIDEOGRAPHER: We're going off the
10 record. The time is 1:12.

11 (Recess from 1:12 p.m. to 1:13 p.m.)

12 THE VIDEOGRAPHER: Back on the record.
13 The time is 1:13.

14 Q. (By Mr. Cain) All right. You indicated
15 off the record, Mr. Oltmann, that through your search
16 function, you're not able to pull up messages from the
17 Facebook contact; is that true?

18 A. That is true.

19 Q. You'd have to individually go through that.
20 And we don't have time for that, at least today we don't.

21 You mentioned also that you had reached out
22 to a number of people to do some invest- -- or in your
23 investigation of Dr. Coomer on the 6th. Who else did you
24 reach out to?

25 A. Publicly available people that were -- you

1 know, the same thing. Just trying to figure out if
2 somebody would give me access to that information, that
3 would be friendly to the idea of validating who Eric
4 Coomer is.

5 Q. Okay. And as you sit here today, are you
6 able to -- if you know, to pull up from Signal the
7 transmittal of the Facebook pages to you?

8 A. I'm not sure I understand the question.

9 Q. Well, is that -- is that transmittal data
10 still on your Signal app, if you know?

11 A. Well, if it was on my Signal app, I would
12 have been able to find it, so, again, I believe that the
13 Signal when I downloaded the information did not carry
14 through -- carry over.

15 Q. Did you ask that the information be sent
16 via Signal to you?

17 A. I don't -- I don't recall, no.

18 Q. Is there any way as you sit here to trace
19 the information of when and from whom you received the
20 Facebook pages?

21 A. I'm not sure I understand the question.

22 Q. Well, I'm just -- if I want to show the
23 Court, Here is evidence of when these Facebook pages were
24 transmitted to Joe Oltmann, as I sit here, I don't have
25 anything but your word.

1 So is there any physical evidence that you
2 can think of that would show that transmission?

3 A. Yeah. I mean, I don't know. As I sit
4 here right now, no, but if I'm given more time to think
5 about it, I can probably come up with some sort of record
6 of where it came from.

7 Q. But you're certain, as I understand your
8 testimony, that this person that gave you the screenshots
9 was one of Dr. Coomer's friends on his Facebook page at
10 the time?

11 A. Yeah, I think still friends.

12 Q. Did he or she -- is it a he or she, can you
13 at least tell me that?

14 A. No.

15 Q. Did he or she explain to you why they were
16 willing to provide you access to this information; what
17 their motivation was?

18 A. Yeah. I don't -- I don't think they
19 probably had a motivation other than my explanation of
20 what I was dealing with. I mean, look it's a pretty
21 heavy conversation, right? It's not something to
22 be -- you know, to take lightly.

23 Q. Did you have to convince this person the
24 reason for --

25 THE DEPONENT: Sorry.

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(Phone ringing.)

A. Apologies. Can you repeat that question?

Q. (By Mr. Cain) Yeah.

Did you have to convince this person to provide you this information? In other words, were they reluctant to do so?

A. No.

Q. And again, the reason you're not giving this to me is because you think that their -- that the reveal of their identity would subject them to some form of retribution by Dr. Coomer?

MS. HALL: Objection, Charlie. He has told you 5 to 10 times already. He doesn't believe it's in the protected order.

MR. CAIN: I've already stipulated to that. I'm --

MS. HALL: I understand what you've said on this deposition. There is nothing in the protective order that was previously filed with the Court that addresses what the Court just said the last time we were there. So I get what your position is. You've heard what my clients' is, and I guess we'll take it up with the court.

MR. CAIN: Oh. So let's assume for the sake of argument that -- that that needs to be buttoned

1 up. I don't believe that's the case. And I already told
2 you that our view is that it's subject to the protective
3 order.

4 Q. (By Mr. Cain) But assuming that
5 information -- or that protective order was extended to
6 this information, would you be willing to provide us with
7 that testimony at that -- at that time?

8 A. I think that I would give up more
9 information if I knew that Eric was not going to get
10 access to that information.

11 Q. Okay. Would you provide us with the
12 identity of this person?

13 A. If Eric did not have access --

14 MS. HALL: Objection.

15 Q. (By Mr. Cain) Is that a Yes?

16 A. I can't speculate.

17 Q. Okay. Let's -- let's talk a little bit
18 about your affidavit. We've spent almost all this
19 deposition talking about the antifa call and some of this
20 Facebook stuff.

21 The affidavit which is Plaintiff's
22 Exhibit 2, I provided that to you previously, was signed
23 by you -- I believe on November 13 of 2020; is that
24 correct?

25 A. Yes. Is that -- Exhibit 2?

1 MR. KIMREY: Mr. Cain, I have a question,
2 a point of clarification. Shall we deem all exhibits
3 that you are referring to within this deposition as
4 exhibits to this deposition?

5 MR. CAIN: Yes.

6 MR. KIMREY: Thank you.

7 Q. (By Mr. Cain) Are you with me,
8 Mr. Oltmann?

9 A. Yes.

10 Q. Okay. So this affidavit you signed
11 November 13, right?

12 A. Yes.

13 Q. And the purpose --

14 A. November 13th, you said?

15 Q. Yes, sir. 1-3.

16 A. All right. Perfect. Okay.

17 Q. Who asked you to sign an affidavit?

18 A. I don't remember the person.

19 Q. Who were they associated with?

20 A. With Sidney Powell, I do believe.

21 Q. You understood that this affidavit
22 potentially was going to be used by Ms. Powell in
23 connection with litigation?

24 A. Yes.

25 Q. Okay. And you allowed this affidavit to be

1 filed of record in lawsuits that Ms. Powell was associated
2 with?

3 A. No. I just filed an affidavit, and I
4 signed it.

5 Q. Okay. But your expectation was that this
6 could be used as evidence in a lawsuit Ms. Powell was
7 involved with?

8 A. The only expectation I had was that I was
9 going to sign an affidavit of what I knew.

10 Q. Okay. Well, in terms of what you knew,
11 just looking at the affidavit, I have a few questions.
12 You go over, of course, the antifa call, right?

13 A. Yep. Yes.

14 Q. On page 2.

15 You refer to the call as being on or about
16 the week of September 27. But that's not correct, right?
17 It was prior to that week, true?

18 A. I think that's why I wrote -- they put "on
19 or about." So I had this -- they drafted this. I gave
20 them information. They drafted it. And then I signed
21 it. So there's parts of this that were not complete, or
22 that had pulled stuff out and made it so that the context
23 could be changed.

24 But overall, the information is still
25 accurate because they did put on or around, I think.

1 Actually, I can't -- yeah, on or about --

2 THE REPORTER: I'm sorry. Whoa, whoa,
3 whoa.

4 Q. (By Mr. Cain) But it's more accurate --

5 THE REPORTER: I just didn't get the last
6 part of your statement, sir. You dropped your voice.

7 THE DEPONENT: I said on or about the week
8 of September 27th.

9 MR. KIMREY: And I just note for the
10 record that Plaintiff's Exhibit 2 is Bates Powell 206
11 through Powell 211.

12 THE REPORTER: Who just spoke?

13 MR. KIMREY: That was Blaine Kimrey.

14 THE REPORTER: Thank you.

15 Q. (By Mr. Cain) All right. To be more
16 accurate, the -- the antifa call -- you say meeting here,
17 but was prior to September 26, not during the week of
18 September 27th, true?

19 A. Well, it says on or about the week of
20 September 27th. So that was still on or about the week.
21 So this had happened before the 26th. So, yes, then this
22 would be factually accurate.

23 Q. And this -- well, this affidavit was done
24 less than two months after the call, right?

25 A. Yes.

1 Q. And so you did your best to be as complete
2 and accurate in this affidavit as possible, right?

3 A. I -- I gave them a bunch of information.
4 I don't think I gave them completely all the information.
5 Just the information I felt was important to the
6 affidavit.

7 Q. Right.

8 And no one from the Powell camp asked you
9 any of these questions about how did you get on the call
10 in terms of your conduit and that sort of thing, did they?

11 A. I think there's a lot of moving parts at
12 the time, and the things that they were more concerned
13 with was the litany of affidavits that were coming in
14 from across the nation. And it was getting as much of
15 this information as possible so that they could do
16 fact-finding and figure out what the credibility was of
17 all that information collectively, in the middle of
18 having SISA and other organizations within days of the
19 election say that there's nothing to see here, this is
20 the safest election ever, without even doing any sort of
21 discovery into the sheer volume of fraud that was
22 existing across our nation.

23 MR. CAIN: Objection. Nonresponsive.

24 Q. (By Mr. Cain) All I'm asking is: No one
25 from the Powell camp that was involved in obtaining this

1 affidavit asked to speak to your conduit or interview them
2 associated with confirming your story, fair?

3 A. I didn't have a credibility issue. I
4 didn't have an issue where you --

5 Q. No, sir. I asked you if they asked for
6 that information. Yes or no?

7 A. No.

8 Q. You say in here, and you wrote in your
9 notes -- you use the word in your notes, "fortifying."
10 But when you're talking about Eric speaking on this -- and
11 this is on the middle of page 2 of the affidavit, Powell
12 207 -- Eric continued with fortifying the groups and
13 recruiting.

14 Okay. Are you referring to Eric Coomer in
15 that sentence?

16 A. Where is this part?

17 Q. It's in -- a little higher than the middle
18 of the page on the second page of your affidavit. You go,
19 The conversation went like this.

20 And then you described the conversation
21 about Eric being the Dominion guy, et cetera?

22 A. What -- what page are you referring to?

23 Q. Sir, I don't -- I've already said that
24 twice now. The second page of your affidavit, Powell 207
25 is the Bates number on the bottom right.

1 A. Okay.

2 Q. You're talking about the conversation on
3 the antifa call. At the middle of it, you say, Eric
4 continued with fortifying the groups and recruiting.

5 My question was: You're referring there,
6 obviously, to Eric Coomer, correct?

7 A. I am.

8 Q. All right. I want you to tell me what you
9 remember Eric Coomer saying about fortifying the groups
10 and recruiting specifically.

11 A. So there's a ton of rhetoric going on on
12 the call itself and the comments made about keeping up
13 and fortifying their efforts. There was a bunch of
14 people talking all at the same time. So, you know, Eric
15 was in the middle of communicating on the call, along
16 with all these other people.

17 So when I talk about being excentric and
18 boisterous, it's the -- it's the vulgarness of -- by
19 which they all seem to communicate. The F word is
20 probably every other word.

21 Q. Yes, sir. But you say and swore in this
22 affidavit that Eric did and said certain things. He
23 talked about fortifying the groups and recruiting.

24 A. Right.

25 Q. What specifically did he talk about in

1 terms of fortifying the groups and recruiting?

2 A. So I just answered that question as it
3 relates to them talking about fortifying, right? Again,
4 I referred back to my notes when I had -- when I was
5 writing this stuff, and some of this information is
6 missing other paragraphs that I would have left in it.
7 Right.

8 So the fortifying and saying that, Hey, we
9 need to keep up the pressure, those comments came out of
10 Eric's mouth. Those comments came out of other people's
11 mouths. It was -- it was a centric bit of hyperbole.

12 Q. All right. So you say, Keep up the
13 pressure. You're attributing words to that effect -- to
14 Eric Coomer. What was he referring to about keeping up
15 the pressure?

16 A. I don't know. I would assume it's related
17 to antifa and the things that they are doing across the
18 state of Colorado and the country at that point. I mean,
19 they were terrorizing communities and burning down
20 buildings and looting and shooting and stabbing and
21 throwing frozen water bottles and feces.

22 So it probably had something to do with
23 that.

24 Q. Let me -- let me ask you. You've done a
25 lot of research into antifa, it's clear. What evidence do

1 you have that Dr. Coomer was involved, outside of this
2 call, as you've alleged, was involved in any
3 activity -- antifa-related activities, whether it's March
4 or speaking at a rally or throwing feces, as you say?
5 What evidence do you have that he actually was part of an
6 antifa movement?

7 A. So -- well, first of all, he posted the
8 antifa manifesto on his Facebook page on, I think,
9 June 5th or June of 6th.

10 Q. And we've talked about the Facebook. I'm
11 talking about --

12 A. We haven't specifically talked about that
13 particular post.

14 Q. Right. I'll exclude since we don't have
15 time, and we know what -- we can look to in terms of
16 Facebook. I'm asking, based on the amount of time that
17 you spent looking into Eric Coomer and his association
18 with antifa, carving out any kind of Facebook --

19 A. Okay. I'll bite. All right. Let me walk
20 through -- let me walk through all the information that I
21 learned about Eric Coomer.

22 Q. I'm asking a specific question. Not --

23 A. That's the specific question. You
24 can't -- you can't carve it out and say you don't want me
25 to answer the question.

1 Q. Here's the question. Here's the question.
2 Listen to my question.

3 A. Okay.

4 Q. What information do you have that -- that
5 puts Eric Coomer in an antifa event, rally, as a speaker,
6 as a member of an association that you -- that you equate
7 with antifa? What specifically do you know about that?

8 A. I know that I was on this call, and I know
9 that Eric at Dominion was on that call. I know that I
10 walked through and listened to other videos that had Eric
11 Coomer on it, and it was the same voice that was on this
12 call, who was on those other calls doing demonstrations
13 across the country.

14 So I know that I did an amazing amount of
15 due diligence to tie back the Eric who was on the antifa
16 call to the Facebook posts, and the likelihood of that
17 happening. And then going even further into that and
18 finding information related to owning the adjudication
19 process -- or excuse me, being a patentholder for the
20 adjudication process for the Dominion voting systems, as
21 well as the numerous affidavits across the country, which
22 as it came to light even after this time, tied back
23 improprieties to Dominion, such as the fact that there is
24 a modum inside the machine, yet the CEO of the Dominion
25 voting system said that there was no modem inside it.

1 They now have amended that and said, Oh,
2 there is one, but it's not used and it wasn't turned on
3 during the course of the election.

4 Q. I'm asking you about motives.

5 Did you -- have you seen Dr. Coomer at a --
6 at an antifa really?

7 A. You asked me what information would be
8 provided that would lead me to believe that Eric Coomer
9 was, in fact, a part of antifa and what other information
10 do you have that would lead me to that conclusion. I'm
11 trying to give that you information that led me to that
12 conclusion, and you don't want to hear my opinions. Not
13 because it's not --

14 Q. Sir, you're wasting time again.

15 Have you seen -- let me -- let me break it
16 down for you.

17 Have you seen video evidence or in-person
18 evidence of Dr. Coomer at what you would consider an
19 antifa rally, yes or no?

20 A. No.

21 Q. Have you seen him speak at -- or at a
22 movement or some event that involved antifa?

23 A. Yes.

24 Q. Which one?

25 A. This call that I was on back in September.

1 Q. All right. I'm talking about any kind of
2 public event that -- that antifa was associated with.
3 Speaker at a rally or anything like that.

4 A. Well, I didn't attend antifa rallies.

5 Q. Have you seen any evidence of that, videos
6 of Dr. Coomer speaking at an antifa rally?

7 A. I have not reviewed any of the antifa
8 videos, and everyone during the summer of 2020 was
9 wearing masks and covering their identity. So getting
10 access --

11 Q. So your answer is no --

12 THE REPORTER: Just a moment. One at a
13 time.

14 THE DEPONENT: Apologies.

15 THE REPORTER: Still, one at a time.

16 Q. (By Mr. Cain) Go ahead.

17 A. The difficulty in uncovering who was at
18 any of these antifa rallies, even given the videos that
19 you have there, would be very difficult because of the
20 fact that all their faces were covered.

21 So, you know, can I say for -- with
22 certainty that -- that he was at a -- at an antifa rally,
23 the answer to that question is no. Can I say that he
24 wasn't? The answer to that question would be no, as
25 well.

1 Q. Well, you're certain -- and you've said
2 this previously about Heidi Beedle -- that she's part of a
3 group called Revolution, I think; is that right?

4 A. Yes.

5 Q. Yeah, that's your testimony on that.

6 What group, if you know, is Dr. Coomer
7 involved with that you view as an antifa-related
8 organization?

9 A. Well, most of the antifa members of the --
10 how you say an idea and not an organization, although
11 it's a very, very well-run organization, do not make
12 themselves known. They do not make themselves
13 associated, because by that association, they would
14 associate with murderers and rapists and people that hurt
15 people in the community and bully them to get them to, I
16 guess, stay in their homes. Intimidate them.

17 Q. So you can't identify a specific
18 organization that you've been able to research and
19 conclude that Dr. Coomer is involved with some leftist
20 organization?

21 A. Yes, I can actually. He proclaimed
22 himself that he was a part of the skinhead movement and
23 in the article written in the New York Times by Susan
24 Dominus, he admitted that he was a part of the skinheads,
25 but it was a special group of skinheads that are against

1 racism.

2 So that is a far left organization that
3 has strong ties to communism and Marxism, and he was
4 by -- self-proclaimed a part of that even dating back to
5 his time in Denver, Colorado.

6 Q. Thanks. So skinhead organization. Is that
7 it?

8 A. I don't -- I don't know. I haven't
9 done -- I will say for right now, to answer your
10 question, yes.

11 Q. All right. So when he was talking about,
12 as you say in your affidavit, recruiting -- antifa
13 recruiting, what specifically was Dr. Coomer saying he
14 wanted to do to recruit new members of this group?

15 A. Well, I think it was the comments that
16 they have collectively where they were agreeing with and
17 talking to them about keeping the pressure on and staying
18 the course that were directly related to that
19 recruitment.

20 I don't use it from recruiting from the
21 standpoint of walk through a door, knock, knock. Just
22 recruitment of making sure we get more people to show up
23 to these events.

24 Q. Would you describe Dr. -- I'm sorry. I
25 thought you were finished.

1 A. No.

2 Q. Would you describe --

3 A. Go ahead.

4 Q. Would you describe Dr. Coomer as being one
5 of the leaders of the antifa group that was assembled on
6 this call?

7 A. No. Nor did I at the time believe that he
8 was actually -- after doing research, that he would
9 associate himself with antifa.

10 Q. You mention -- I don't want to spend a lot
11 of time on this.

12 So at the end of your affidavit, the last
13 full paragraph, you talk about you used ARIMA, A-R-I-M
14 analysis to show trends.

15 A. Yeah.

16 Q. Do you remember that?

17 A. Yeah.

18 Q. Okay. Do you have that analysis handy
19 still?

20 A. I have some of the information related to
21 what I did on the -- on other analyses later, but ARIMA
22 is -- uses -- I mean, do you know what ARIMA is.

23 Q. I know what it stands for. But I guess my
24 question is: If I -- you talk about it in your affidavit.
25 If you have datasets involved with that, if you have

1 some -- some analysis, I'd like to see it.

2 Have you produced any of that information
3 to anyone, either the defendants in this case or other
4 experts?

5 A. No, but I created a chart. So this is the
6 stuff that I can get into more specifically. But I
7 created a chart that looked at the voting probability of
8 people voting a certain way during a time series, and
9 then voting a certain way after that time series and the
10 likelihood of that actually happening by using previous
11 lags as opposed to what happened in the future.

12 So using a stationary point, and then
13 creating a plotted chart to show me whether or not
14 there's any irregularities or errors in the data that
15 were -- that would not be probable based upon the
16 information that was input.

17 Q. So my question is that the charting that
18 you used and the datasets -- or the charting that you
19 created and the datasets, do you still have that
20 information?

21 A. I think so.

22 Q. Did you -- and you -- but you didn't
23 provide it to anybody outside of your own group; is that
24 correct?

25 A. So that's not necessarily true. I brought

1 some of those charts to Washington, D.C. in early
2 January. I provided that information as it relates to
3 Dominion voting systems and the vulnerabilities that they
4 had in the Dominion voting systems. And the process of
5 walking a through path of Dominion to the Black Box, to
6 how they recover those votes, how it's transferred over
7 to SCYTL, how SCYTL goes on to Edison, how Edison then
8 translates that over to the New York Times.

9 Q. Right. And you talked about that in your
10 August 18 testimony from -- when Sidney Powell's lawyers
11 were asking you about this issue, right?

12 A. Yes.

13 Q. And you said then that you know how
14 Dr. Coomer can flip the Election, to use your words,
15 right?

16 A. Is that what I said?

17 Q. Yes. You said you know how Dr. Coomer
18 flipped the election.

19 A. Is that what I said?

20 Q. Yes.

21 A. I haven't seen the transcript.

22 MS. HALL: Well, Charlie, the reason he's
23 asking you is you obviously have a copy of the
24 transcript. We haven't seen the transcript yet. So
25 where did you get the transcript?

1 MR. CAIN: Sidney Powell's lawyers sent it
2 to everybody.

3 MS. HALL: Well, I haven't seen it. I
4 didn't get it.

5 MR. CAIN: Well, that's not on me.

6 MS. HALL: I didn't say it was. I'm just
7 saying he hasn't seen the transcript.

8 THE DEPONENT: No. Show me
9 the transcript.

10 MR. CAIN: All right. So here on
11 page 181 --

12 MR. ARRINGTON: This Barry Arrington. I'm
13 going to put on the record that I sent the transcript to
14 everyone.

15 THE REPORTER: Who just spoke?

16 MR. ARRINGTON: This is Barry Arrington.

17 I don't know why you're saying you haven't
18 seen it. I sent it to everyone.

19 MS. HALL: I'm not saying you didn't,
20 Barry. I'm just saying I did not receive anything, and
21 neither did Ingrid. So that's all I'm saying.

22 Q. (By Mr. Cain) I'll go about it this way
23 since we don't have --

24 A. Therefore, I haven't reviewed it.

25 Q. Outside of the transcript -- I mean, you

1 can just testify now. Do you or do you not know how
2 Dr. Coomer flipped the Election?

3 A. I believe I know how the election was
4 influence and/or stolen, yes.

5 Q. And I -- you used a passive. I asked -- I
6 said Dr. Coomer. You know how Dr. Coomer, at least
7 according to your -- your analysis, how he was involved in
8 flipping the election, true?

9 A. I know that Coomer was a director of
10 strategy and security for Dominion voting systems, and in
11 that capacity and owning the adjudication process
12 in -- in that system, I know where the election
13 was -- was affected, yes. I know where it was
14 compromised.

15 And Eric Coomer is responsible for those
16 things, and therefore, I think that I know -- actually I
17 know that I know -- how Dominion was able to affect or
18 leave open vulnerabilities to allow for the election to
19 be stolen.

20 Q. Right. And you've testified -- you've
21 testified at length in questions from Ms. Powell's lawyers
22 about that specific topic, right?

23 A. Yep.

24 Q. Just a few weeks ago. And you said that
25 you hadn't reduced, as of that time, your analysis to some

1 written format or report.

2 Have you done that now? Have you prepared
3 a report reflecting your analysis?

4 MS. HALL: Objection. Relevance.

5 A. No. I did. I provided a diagram -- a
6 very crude diagram that the public can understand. I
7 worked on the deviations between the -- four deviations
8 that happened inside the Dominion system.

9 Q. (By Mr. Cain) Okay. Let me make sure -- I
10 want to make sure we get this on the record.

11 A. Can you hear me?

12 Q. Yeah, who's speaking?

13 MR. KIMREY: I'm sorry. This is Blaine
14 Kimrey.

15 So we're new to this matter. I'm
16 wondering, just for clarification, Mr. Cain, if you have
17 a copy of the sworn statement, could you enter it in the
18 deposition since you're talking about it a lot?
19 And Mr. Oltmann has acknowledged that he did give a sworn
20 statement, so maybe if we could actually see it and he
21 could confirm it as entered in the deposition, that would
22 make everything easier to follow. Just a suggestion.

23 MR. CAIN: I appreciate it. I'm moving
24 off that now because I asked him the question outside of
25 this sworn statement, and I'm not -- I just don't have

1 time to address that.

2 Q. (By Mr. Cain) So let me -- let me get back
3 on to what I was talking about. You had testified that
4 you -- that you had done analysis in this -- of behavioral
5 deviations and tech deviations, it's part of what you
6 said.

7 And then I asked you, Has this been reduced
8 to writing? And you said it -- you referenced a schematic
9 or something that we could all understand. Is that fair?

10 A. Yes. So I've been assisting with
11 gathering information related to how the Dominion system
12 works. So I was able to -- I've done it in different
13 parts, related to even like the ICX machine, the ability
14 to bypass the ICX in cases of balance outstanding or the
15 alignment being off.

16 So I've done multiple things where I've
17 written out diagrams on how the system can be
18 manipulated -- be manipulated inside of the -- inside of
19 the Dominion system, depending on which part you have.

20 Q. Well, we'll conclude on this as probably
21 the last topic. On Exhibit 103, which we previously
22 marked from your recent disclosures, this is
23 Document 0 -- I believe it's small -- but it is 0881,
24 which is a diagram -- it looks like a voting system
25 diagram. I want you to --

1 (Phone ringing.)

2 THE REPORTER: Just a moment. I can't
3 hear.

4 THE DEPONENT: I don't know why it came
5 through my phone. Hold on.

6 Q. (By Mr. Cain) So Exhibit 103 has a diagram
7 that I think is what you're referring to. Can you confirm
8 that this is the diagram that you were just talking about?

9 A. Yes.

10 Q. Okay. So the -- the work that you've done
11 regarding -- at least as of this date regarding
12 Dr. Coomer's participation in flipping the election, in
13 part, is reflected on this particular diagram that we're
14 looking at, correct?

15 A. Those -- that diagram walks through the
16 vulnerabilities of the Dominion voting systems and the
17 possible ways to, what I call, big cons and small cons.
18 Small cons to keep you distracted, and the big con of how
19 you were able to take invalidated fraudulent votes and
20 then reconnect them with people that vote.

21 Q. And your -- your conclusion is that
22 Dr. Coomer's part of the big con; is that right?

23 A. My conclusion is that -- that Eric made
24 comments related to making sure that President Trump was
25 not going to win. And I did not make statements related

1 to that Biden was going to win because I didn't hear
2 that. I just heard that President Trump was not going to
3 win, and those came from him.

4 And I validated him, and then after that I
5 validated his social posts, which are very boisterous
6 and -- that validate that -- number one, he's not in a
7 position where he could influence it. And number 2, he
8 said he would influence it. And number 3, that his clear
9 bias and hatred for just the country, police officers,
10 and his support for antifa was -- was well noted.

11 Q. (By Mr. Cain) Okay. Well, that's
12 different than what you've testified to before in terms
13 of --

14 A. How is that different?

15 Q. -- to actually having -- I had understood
16 that you said from a technical standpoint, Dr. Coomer was
17 involved in rigging the election, which would affect
18 results, and you even testified to this -- in places like
19 Antrim County; in Mesa County, Colorado; and Cobb County,
20 Georgia?

21 A. That he would have the ability to do that
22 and he's in a position to do that, absolutely.

23 Q. Okay.

24 A. I was very clear on that. I've been clear
25 the entire time. I've never once changed anything about

1 what I've said, not once.

2 Q. Well, and you've said, in fact, that
3 he -- you -- at least in your last testimony, that you're
4 95 percent sure that he actually engaged in that activity
5 of flipping the election.

6 A. I don't have a transcript.

7 THE REPORTER: I'm sorry. I can't
8 understand Ms. Hall.

9 A. I don't even know if that's a question or
10 not.

11 Q. (By Mr. Cain) Yeah. You have a high
12 degree of certainty -- you've testified already --

13 A. I do.

14 Q. -- in the deposition with the Powell
15 attorneys that you have a 95 percent degree of certainty
16 that Dr. Coomer was involved in flipping the election.

17 A. Yes.

18 Q. All right. By the way, while I'm thinking
19 about it, you -- do you hold yourself out as an election
20 security expert?

21 MS. HALL: Objection. Relevance.

22 A. No, I'm a data guy.

23 Q. (By Mr. Cain) Okay. So you would agree
24 with me that you are not an election security expert?

25 MS. HALL: Objection.

1 THE DEPONENT: Should I answer?

2 A. Okay. So I built a system that
3 develops --

4 THE REPORTER: I'm sorry. I'm sorry, sir.
5 Can you slow down just a bit?

6 A. I built a system that creates quality
7 scores, relevant inspectors, and correlations of data on
8 individual DNA of an individual. I built the
9 architecture behind a system that allows for us to
10 perform very well, actually above anyone else in the
11 country related to how we position messaging in front of
12 millions of people. I built that.

13 We're one of the largest first-party data
14 aggregators in the nation when I ran my company. I know
15 that within a couple of days of me coming out and talking
16 about what information I did have, I had death threats.
17 I know that that -- those death threats have continued
18 through the last nine months.

19 Q. (By Mr. Cain) Sir, my question was
20 election security expert. Do you hold yourself out as an
21 expert in election security issues?

22 A. I would hold myself out as an expert in
23 system architecture. I would hold myself out at -- and I
24 can prove over time as a two-time Ernst & Young
25 entrepreneur of the year nominee and one-time finalist in

1 2020, after going through some rigorous tests by many of
2 the people on those panels, that I know what I'm talking
3 about when it comes to code and when I'm talking about
4 when you are talk about the Black Box, RUP kits, having
5 people overseas write code for you. What the
6 implications are of having connections to different
7 systems that are not secured. Having internet access
8 with the ability to access those systems.

9 From an architecture standpoint, I could
10 punch holes in what Dominion has built over and over and
11 over again. I don't need to know that you have to take a
12 stack of votes and put it through the system. I have to
13 know that you can secure those votes through technology
14 that allows for transparency, which is what the system is
15 supposed to be built on.

16 Q. You're -- you're speaking quickly, which is
17 find except for Laurel. She's probably going to kill both
18 of us after this deposition.

19 My -- you're not answering my question.

20 A. I did answer your question.

21 Q. Have you -- let me ask a different question
22 and see if you can answer this one.

23 Do you have any experience working in
24 elections or in election security?

25 MS. HALL: Objection. Relevance.

1 Q. (By Mr. Cain) You can answer.

2 MS. HALL: Please explain how this is
3 relevant to your defamation claim, Charlie.

4 MR. CAIN: Nope.

5 MS. HALL: Okay. Well, then move on. And
6 you're done.

7 MS. DEFRANCO: He's done.

8 MS. HALL: What's the time?

9 THE VIDEOGRAPHER: It's three hours and
10 three minutes.

11 MS. HALL: Thanks. We're done, Charlie.

12 A. Can I answer this last question?

13 Q. (By Mr. Cain) Yeah. You're going to
14 answer potentially more, but why don't you finish
15 this with -- we have tomorrow, obviously set aside as
16 well, but go ahead.

17 MS. HALL: No. Charlie. You have PCU
18 United tomorrow, Shuffling Madness, and CD Solutions. So
19 there will be no questions that are posed to Mr. Oltmann.

20 A. I'm going to answer this question if I can
21 because it's fresh in my mind.

22 THE DEPONENT: Can I answer it?

23 A. Okay. I have not worked in Dominion,
24 Sequoia, ESNS, Hart, Clear Ballot, I've never worked
25 inside of an election system. With that said, there are

1 certain things that you have to do in order to secure a
2 system.

3 I did and was a CEO of a company that did
4 MSP services, so I understand that's Managed Service
5 Provider, which is the IOT of an internet of things --

6 THE REPORTER: I'm sorry. Of the
7 internet? I just didn't hear the word.

8 THE DEPONENT: Internet of things.

9 Q. (By Mr. Cain) I-O-T.

10 A. We also have an e-commerce platform that
11 is a headless design. It services some fortune 100
12 companies in the United States. So I'm very familiar
13 with security, and as it relates to how the systems
14 interconnect and the API that are available, how to move
15 things offline and online. How to find out or discover
16 whether or not something is or is not connected to the
17 internet, and the probability of those things being
18 connected to the internet by way of looking at the math
19 and science, which is why I used mathematical equations
20 to figure out whether or not this is probable.

21 So it leads me back to fact-checking the
22 information related to the system architecture. It's a
23 simple process that anyone that's involved in technology
24 goes through in order to make sure that they can validate
25 or invalidate their theory.

1 In this case the theory came back, and I
2 was able to look at what would probably happen in Georgia
3 as an example on early January that related to, and it
4 came true. The system came down, it came back up. We
5 were able to validate other information that we call
6 offline information in order to validate that there was a
7 probable system interference.

8 Now, whether or not that system
9 interference was caused by Dominion is -- is not
10 even -- it's not even up for debate. It's not up for
11 debate. Dominion has a system that Antrim, Mesa County,
12 and other counties were able to validate would show that
13 in the math of how they calculate votes.

14 Dominion was complicit in that behavior,
15 that is -- and I think that I have enough expertise and
16 technology that I can come to that conclusion without
17 actually working for Dominion.

18 MR. CAIN: I'm prepared to move forward
19 with additional questions which counsel seems to believe
20 that --

21 MS. HALL: We're done. No, your three
22 hours is up, Charlie. I'm going to do some clarification
23 now with my client here.

24 /////

25 /////

EXAMINATION

BY MS. HALL:

Q. So, Joe, you were asked by Mr. Cain about this contact for your ability to get on a call. Who -- or not who reached out to you, but did you reach out to that person or --

A. No.

Q. -- did they reach out to you?

Explain that.

A. They reached -- they reached out to me.

Q. Can you explain that a little bit more?

A. I never made a proactive approach to a person that got me on the antifa call. I wasn't the one that did the reaching out. They reached out to me.

Q. And what was the purpose of you getting on that call?

A. It was just to discover antifa journalists. And if you go back to October 15th, I believe it was, I'd have to check -- either October 15th or 14th, I was in an FEC meeting. And I said, We have been -- we have infiltrated antifa. Based on that call, that I got all the information I was able to collect afterwards, that said that, Hey, we were able to uncover these antifa journalists and uncover these antifa journalists, the next day an antifa journalist wrote an

1 article about the fact that I had threatened antifa
2 journalists on that -- in that FEC meeting.

3 That was prior to the election, before I
4 even knew Dominion's name. I knew their name, but I
5 didn't know the significance of Dominion across the
6 country.

7 Q. And these journalists were actually doxing
8 you, correct?

9 A. Yes, and they were using -- they weren't
10 just doxing me. They were doxing other people. They
11 were using systems and relationships that they had.
12 People that were working in other places, such as working
13 in vet centers. That they would gather information of
14 people that owned pets, and they would report those pets
15 to the animal control to say that they were abusing their
16 animals.

17 They would report people for their kids,
18 to CPS, that said that they were abusing their kids. So
19 they used their positions in this web of -- or group of
20 people in order to intimidate, threaten, dox, and cause
21 harm to other people in the community. It wasn't just
22 me.

23 MS. HALL: Okay. We're complete.

24 MR. ARRINGTON: I'm going to have some
25 follow up.

1 THE REPORTER: Who's speaking?

2 MR. ARRINGTON: This is Barry Arlington.

3 MS. HALL: No. No. Barry, we're not
4 going to -- we're not going to agree to that.

5 MR. ARRINGTON: I don't care if you agree,
6 Andrea. This is a deposition. I'm counsel at the
7 deposition, and I'm going to do some cross-examination.

8 EXAMINATION

9 BY MR. ARRINGTON:

10 Q. My first question -- so, Mr. Oltmann, I
11 have a couple of questions about your prior testimony.
12 The question is this: In response to one of Mr. Cain's
13 questions, you said about -- about whether Dr. Coomer was
14 affiliated with antifa. I thought you said, Nor did I
15 believe --

16 THE REPORTER: I'm sorry. Just a moment.
17 Just a moment. Just a moment. Just a moment. Just a
18 moment, please. There are multiple people talking, and I
19 cannot hear the question.

20 MR. ARRINGTON: I'll repeat the question.

21 Q. (By Mr. Arrington) So I believe you said
22 in response to one of Mr. Cain's questions about
23 Dr. Coomer's association with antifa, that, quote -- I
24 tried to jot this down -- quote, Nor did I believe after
25 conducting research he, meaning Dr. Coomer, would

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1 associate himself with --

2 Did I -- did I misunderstand you? I
3 thought you believed that he was associated with antifa.

4 A. Yes, I did. So let me clarify that. This
5 is the context part where it's taken out of -- when I did
6 the original research on Eric Coomer, and I found out
7 that he had a doctorate in nuclear engineering, I did
8 not, at that point in time back in September, feel that
9 he was -- he wasn't my target. I thought maybe he was
10 CIA or FBI.

11 I did not believe -- I couldn't understand
12 why someone who was -- had a doctorate in nuclear
13 engineering would associate himself with antifa. And
14 since he wasn't the person I was looking for at the time,
15 I just filed all this stuff away for Eric Coomer as he
16 was on that call, but I didn't understand the
17 significance of it. Does that make sense?

18 When I verify that that's who he was, it
19 just didn't seem normal to me that a person that has a
20 doctorate in -- in nuclear engineering would be involved
21 in this type of -- in this type of organization.

22 So as I went through and revalidated
23 information related to his social posts and started doing
24 more research on Mr. Coomer and, you know, his history of
25 being involved in the skinhead movement and some of the

1 other things that he had done related to information
2 we've been able to dig up, I certainly believe that he
3 was a part of the antifa movement and had a significant
4 role in antifa just based on someone else knowing who he
5 was and what his capabilities are and the breadth of what
6 Dominion voting systems does across the nation, the
7 influence that they have.

8 Does that clarify that?

9 Q. (By Mr. Arrington) Yes. Thank you.

10 You also said that you provided certain
11 information to Ms. Powell. I'm going to -- I'm sorry for
12 this. For some reason there was a misdirection that you
13 didn't get the transcript of your testimony from last
14 month.

15 But at one point -- I'm reading from the
16 transcript -- it says -- you testified that you may have
17 sent Sidney Powell some of this information.

18 MR. ARRINGTON: And for counsel's
19 information, I'm reading from page 138, starting at
20 line 4. I'll start over.

21 Q. (By Mr. Arrington) And you testified that
22 you may have sent Sidney Powell some of this information
23 you were gathering. You have specific recollection that
24 you did send it to her? If so, when?

25 And you answered, So other than the

1 information that I had provided, if I had sent anything to
2 Sidney, it would have been with Randy Corporon on it as
3 far as lawyer to lawyer.

4 So is it a fact that you're -- you did not
5 communicate directly with Ms. Powell, that -- that you
6 communicated with her through Mr. Corporon?

7 A. Yeah. So I -- I'm going to say this
8 because I actually went back and listened to everyone
9 else's depositions as well. I did not have any direct
10 conversations with Sidney Powell. All right? Those
11 conversations happened through attorneys. So me and
12 Sidney Powell directly did not have any conversations.

13 Q. So you've testified that you've done
14 extensive research regarding Dr. Coomer; is that correct?

15 A. Yes.

16 Q. Can you summarize some of the things that
17 you found out about his background that you have personal
18 knowledge of in terms of your research that would lead
19 you -- that would lend credence to your accusation that he
20 was associated with antifa and that he was a -- I don't
21 remember your exact words, but a -- someone who was an
22 agitator or aggressive or however you want to suggest
23 that?

24 A. Well, there's someone that -- yeah, so as
25 I went through and did research, I was able to uncover

1 certain things about Mr. Coomer. One of which is being a
2 part of the skinhead movement. Two, the way that he
3 spoke was -- you know, it's pretty -- it's pretty vulgar.
4 And where he speaks that vulgarity and how he speaks it,
5 lend credibility to how antifa acts as well.

6 Then you have the -- the information that
7 Eric wrote specifically about his wife where he talked
8 about sexually battering, urinating on, making bark like
9 a dog and some of the other things that Eric did. And
10 then publicly put that information out there in an effort
11 to humiliate his wife.

12 Then there's the -- the post that he put
13 up, and the things that he admitted to about being a drug
14 addict and getting in fights and being the person that --
15 that not only is -- you know, I guess a nuclear student
16 or a physicist, that is -- that can beat up people.
17 Right?

18 And I'm paraphrasing some of the things
19 that I have learned about him. And then you look at the
20 other things that came up related to how he treats
21 people, and talking about other people that had worked
22 with Eric Coomer.

23 So there's just not a lot of redeeming
24 stuff that's out there about Eric Coomer relating to --

25 Q. Let me ask you this: Did you have any

1 occasion to find out anything that he personally said
2 about his own mental health?

3 A. It --

4 MR. CAIN: Let me -- hold on, Mr. Oltmann.
5 Mr. Arrington, I've done this in prior depositions, and I
6 don't want there to be -- my silence to be
7 misinterpreted. That I believe you're outside of the
8 scope of the discovery order, and I would object on that
9 basis. But out of deference to you, if I can just have
10 that running understanding, I won't interrupt your
11 questions.

12 MR. ARRINGTON: I appreciate that,
13 Mr. Cain. I would suggest that everything that I'm
14 talking about here can be tied back into questions that
15 you asked on direct. So if the court reporter could read
16 back the question, I'd appreciate it.

17 (The last question was read.)

18 A. The answer is yes. He had a writing where
19 he said that -- again, I'm trying to find the writings
20 themselves. But admits to being bipolar, admits to having
21 a drug problem, admits to lying multiple times, not just
22 the times that he's admitted to lying when he said that
23 the posts were fabricated or deleting information. So
24 he -- there's a habit, I would say, of -- of this.

25 Q. (By Mr. Arrington) But did your research

1 lead to crimes, such as DUIs and jail time?

2 MR. CAIN: Same objections.

3 Barry, I didn't understand from your prior
4 comment if you'll agree that I can just have a running
5 objection. We can disagree about scope issues or
6 propriety of going outside of the discovery order. But
7 if I can have a running objection, I won't have to make
8 it.

9 MR. ARRINGTON: Yes. We can disagree
10 whether my cross relates back to your direct and,
11 therefore, it would be within the discovery order, and to
12 the extent that your direct was within the discovery
13 order. And yes, we can agree to your standing objection.

14 MR. CAIN: Thank you.

15 THE REPORTER: I'm sorry. Just a moment.
16 Counsel, there -- Counsel, there is background noise
17 coming through Mr. Arrington's mic that I'm having
18 trouble hearing you all the time, Mr. Arrington.

19 MR. ARRINGTON: I'm sorry about that.

20 Could you repeat the last question or
21 reread the last question?

22 (The last question was read.)

23 MR. ARRINGTON: That was the question
24 before last. Let me make another run at it.

25 Q. (By Mr. Arrington) Did you have occasion

1 to -- to find out any information about whether he had
2 committed DUIs and been in jail?

3 A. Yes. He bragged about that in some posts
4 that he put on a blog site -- I believe it was a Google
5 blog site -- about having a good lawyer, otherwise, he
6 would have spent quite a bit of time in jail.

7 And then through subsequent information
8 that I was able to uncover, it showed that he had
9 multiple DUIs.

10 MR. ARRINGTON: That's all of my
11 questions. Thank you.

12 MR. CAIN: Well, unless counsel for
13 Mr. Oltmann is going to allow us to continue, we're done
14 for today.

15 MS. HALL: No. We're done.

16 THE VIDEOGRAPHER: Going off -- going off
17 the record/, the time is 2:07.

18 (Video deposition concluded.)

19 THE REPORTER: Same orders, Counsel?
20 Transcript orders?

21 MR. KIMREY: I don't know what those
22 orders are. I can tell you what I want, though. Should
23 I do that?

24 THE REPORTER: Yes.

25 MR. KIMREY: So I'd like a rough ASCII.

1 How quickly can you produce that?

2 THE REPORTER: How soon would you like it?

3 MR. KIMREY: I don't want to engage in any
4 sort of cruel and unusual request. You know, I don't
5 know what else you have. What's reasonable for you given
6 other things you need to work on?

7 (Discussion off the record.)

8 MR. ARRINGTON: This is Barry Arlington.
9 Do we have to order today or can we order later? Can we
10 put --

11 THE REPORTER: You can order later if
12 you'd like.

13 MR. ARRINGTON: Okay. Thank you.

14 THE REPORTER: Mr. Cain, your order?

15 MR. CAIN: Whatever Scotty says. I
16 believe we did a one-day turnaround expedite.

17 MS. HALL: And this is Andrea Hall. We'll
18 just -- whatever, I guess -- yeah, reading and signing.
19 I don't know what your turnaround is on that, but, yeah,
20 we'll take the reading and signing.

21 THE REPORTER: Have I covered ordering,
22 counsel?

23 MS. BOEHMER: This is Margaret Boehmer on
24 behalf of Eric Metaxas. We'll take an Etran. We don't
25 need it expedited, and we do not need a rough.

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THE REPORTER: Other counsel?

MR. HOLWAY: This is Eric Holway on behalf of the Trump campaign, and I would like an e-transcript as well, please. And no, I don't need it expedited. Thank you.

THE REPORTER: Any other counsel? No?
I'm off the record.

* * * * *

WHEREUPON, the foregoing deposition was concluded at the hour of 2:11 p.m. Total time on the record was 3 hours and 25 minutes.

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I, JOSEPH OLTMANN, the deponent in the
above deposition, do hereby acknowledge that I have read
the foregoing transcript of my testimony and state under
oath that it, together with any attached Amendment to
Deposition pages, constitutes my sworn testimony.

_____ I have made changes to my deposition
_____ I have NOT made any changes to my deposition

JOSEPH OLTMANN

Subscribed and sworn to before me this _____
day of _____, 20_____.

My commission expires: _____

Notary Public

Address

Job No. TX4792290

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REPORTER'S CERTIFICATE

I, Laurel S. Tubbs, a Registered Professional Reporter and Notary Public within the State of Colorado, do hereby certify that previous to the commencement of the examination, the deponent was duly sworn by me to testify to the truth.

I further certify that this deposition was taken in shorthand by me at the time and place herein set forth and thereafter reduced to a typewritten form; that the foregoing constitutes a true and correct transcript.

I further certify that I am not related to, employed by, nor of counsel for any of the parties or attorneys herein, nor otherwise interested in the result of the within action.

My commission expires September 1, 2023.



LAUREL S. TUBBS
Registered Professional Reporter,
Certified Realtime Reporter
and Notary Public

1 Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.
2 Joseph Oltmann Job No. 4792290

3 E R R A T A S H E E T

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24 Joseph Oltmann

Date

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1 defrancoi@yahoo.com

2 September 9, 2021

3 RE: Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.

4 DEPOSITION OF: Joseph Oltmann 4792290

5 The above-referenced witness transcript is
6 available for read and sign.

7 Within the applicable timeframe, the witness
8 should read the testimony to verify its accuracy. If
9 there are any changes, the witness should note those
10 on the attached Errata Sheet.

11 The witness should sign and notarize the
12 attached Errata pages and return to Veritext at
13 errata-tx@veritext.com.

14 According to applicable rules or agreements, if
15 the witness fails to do so within the time allotted,
16 a certified copy of the transcript may be used as if
17 signed.

18 Yours,

19 Veritext Legal Solutions

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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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VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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