

1 DISTRICT COURT, CITY AND COUNTY OF DENVER  
STATE OF COLORADO  
2 1437 Bannock Street  
Denver, Colorado 80202

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CASE NUMBER: 2020CV34319

4  
5 ERIC COOMER, Ph.D., Case Number 2020CV034319  
Plaintiff,

Courtroom 409

6 vs.

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

12  
13 VIDEO-RECORDED REMOTE 30(b)(6) DEPOSITION OF  
DONALD J. TRUMP FOR PRESIDENT, INC.,  
14 BY SEAN RAY DOLLMAN

15 REMOTE APPEARANCES:

16 ON BEHALF OF THE PLAINTIFF:

17 ZACH BOWMAN, ESQ.  
CHARLES J. CAIN, ESQ.  
18 STEVE SKARNULIS, ESQ.  
BRAD KLOEWER, ESQ.  
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23  
24  
25 Page 1

1 A That it has to be approved prior to  
2 posting.  
3 Q Approved by whom?  
4 A Normally the comms department.  
5 Q So I'm showing you what's been marked as  
6 Exhibit 62. And I just want to briefly spend a little  
7 bit of time on this. I'm going to skip down to page  
8 24.  
9 Are you aware that there were statements by  
10 President Trump even before the election that he  
11 believed there would be election fraud?  
12 A Well, this is my first time seeing this.  
13 It sounds like it. It looks like it. I'll be honest  
14 with you: I didn't really pay a whole lot of  
15 attention to the news and everything and the  
16 statements. I've stuck to budgets. But I could see  
17 how you could say that.  
18 Q So you'll see in this interview that he was  
19 giving to Fox News on July 19 of 2020, where he  
20 states -- when he's asked, Are you gracious, he says,  
21 You don't know until you see. It depends. I think  
22 mail-in voting is going to rig the election. I really  
23 do.  
24 Chris Wallace said, Are you suggesting you  
25 might not accept the results of the election? And  
Page 18

1 Trump said, No. I have to see.  
2 So even before the election, you'd agree  
3 there were allegations by President Trump that the  
4 election could be fraudulent, correct?  
5 MR. ZAKHEM: Object to form and foundation.  
6 And what topic are we on now?  
7 MR. BOWMAN: This is background, that goes  
8 to the malice that we're getting discovery on.  
9 MR. ZAKHEM: Okay. President Trump is not  
10 part of Donald J. Trump For President, Inc., just for  
11 the record.  
12 Q (By Mr. Bowman) Well, that's a -- that  
13 leads to a good question: Is -- is Donald Trump a  
14 representative of the Trump campaign?  
15 A Are you asking me, Mr. Bowman?  
16 Q Yes. Yes.  
17 A Donald Trump is the candidate of the Trump  
18 campaign.  
19 Q So when he represents things to the public,  
20 is he representing things on behalf of the campaign?  
21 A I think being the candidate of the  
22 campaign, he represents the campaign's, like, backing,  
23 right?  
24 So I would -- I would go with there are  
25 things that he would say as a representative of the  
Page 19

1 campaign; and while he was POTUS, there's things that  
2 he said that represents the United States, right?  
3 So in this distinction of, like, the  
4 mail-in voting and rigging the election, what -- what  
5 background on this particular document is the  
6 President of the United States -- in election  
7 integrity, or is it the campaign?  
8 Q Well, I don't know -- I'm asking you: When  
9 Donald Trump speaks about something regarding the  
10 election, isn't he a representative of the campaign?  
11 MR. ZAKHEM: Object to form and --  
12 A I --  
13 MR. ZAKHEM: Wait, wait, wait.  
14 Object to form and foundation. If you're  
15 asking him about this statement, I want him to read  
16 the document.  
17 MR. BOWMAN: The entire document?  
18 MR. ZAKHEM: Well, yeah.  
19 MR. BOWMAN: Well, let's just move on. I  
20 think I got agreement that this was a representation  
21 before the campaign. So let's go forward.  
22 A Mr. Bowman, can you say that again. I'm  
23 trying to figure out that I agreed that it was a  
24 representation of the campaign.  
25 Q (By Mr. Bowman) I'm sorry. I'm confused  
Page 20

1 by your question.  
2 A You said, Let it be known -- because I  
3 don't -- I don't agree that it's a representation of  
4 the campaign.  
5 MR. ZAKHEM: Sean, his statements -- let me  
6 just interject. His statements that aren't  
7 interrogatories, aren't questions, you're not  
8 responsible for; they don't matter.  
9 THE DEPONENT: Oh, okay.  
10 MR. BOWMAN: If he doesn't know, he doesn't  
11 know. That's fine. But . . .  
12 THE DEPONENT: I thought we agreed with a  
13 conclusion or something and -- I didn't know we  
14 had . . .  
15 Q (By Mr. Bowman) So does Donald J. Trump  
16 ultimately have a role in deciding what the campaign  
17 publishes?  
18 A No.  
19 Q He has no role in deciding?  
20 A No. The campaign, as an entity, would have  
21 that role in what's being published or not.  
22 Q Does what he wants published affect what  
23 the campaign publishes?  
24 A I think there's a consideration, but I  
25 don't think -- it's not -- ultimately, the comms  
Page 21

1 general, the different -- like he said earlier, the  
2 mail-in ballots and when that was going to come in and  
3 people not requesting them.  
4 There's a lot of different things that  
5 could roll into what one would consider fraud.  
6 Q Right. And so I'm asking you, as the  
7 representative of the campaign: At this time, what  
8 is -- what led the campaign to believe that there was  
9 fraud?  
10 A I don't know the answer to that, sir.  
11 Q Do you know who would know the answer to  
12 that for the campaign?  
13 A No, sir.  
14 Q Is it still the position of the campaign  
15 that it believes there was voter fraud?  
16 A The campaign is over, right? So there is  
17 no campaign entity that actually would have a position  
18 on whether there was fraud or not.  
19 Q Well, there's still an entity. I mean, I'm  
20 deposing you today on behalf of the entity. And what  
21 is the campaign's position regarding whether there was  
22 voter fraud today?  
23 MR. ZAKHEM: Object to form.  
24 THE DEPONENT: Well -- I apologize. But  
25 what does that mean, "Object to form"?

Page 26

1 MR. ZAKHEM: You can answer. I'm going to  
2 be throwing objections around all over the place.  
3 Unless I tell you, Don't answer, go ahead and answer.  
4 THE DEPONENT: Okay.  
5 A Mr. Bowman, I apologize. Are you saying --  
6 you asked: Does the campaign still believe there was  
7 some type of fraud within the election?  
8 Q (By Mr. Bowman) Yes.  
9 A Yes.  
10 Q What type of fraud?  
11 A I'm not real sure, sir. I believe that  
12 part of the legal counsel at the time was -- our legal  
13 counsel was, like, directing the team to look into  
14 fraud, right, in anticipation for litigation. And I'm  
15 not too sure on, like, what that outcome was.  
16 Q Which legal counsel was directing the team  
17 to look into that?  
18 A For -- after the election, it was -- the  
19 campaign's legal counsel at the time was Justin Clark  
20 and Matt Morgan.  
21 Q Were they directly employed by the  
22 campaign, or were they at an outside firm?  
23 A Matt Morgan was directly employed by the  
24 campaign.  
25 Q And what about Justin Cloud (sic)?

Page 27

1 A Clark. Justin Clark was the deputy  
2 campaign manager and also worked with Elections, LLC.  
3 Q And were they the main source of directing  
4 the campaign to look into allegations regarding voter  
5 fraud?  
6 A I believe so, yes, sir.  
7 Q Anyone else?  
8 A No, sir. Not that I can think of.  
9 Q So I'm going to show you Exhibit 64. This  
10 comes out right around the same time, a tweet from  
11 President Trump saying, They're trying to steal the  
12 election.  
13 Was there -- was there a decision within  
14 the campaign to start alleging there was fraud before  
15 knowing all the facts?  
16 A Other -- I mean, there was -- like I said  
17 before, legal counsel decided to investigate I think  
18 it was Dominion in 2020, like the summer of 2020, in  
19 preparation -- or in anticipation of litigation.  
20 So I don't know all the facts and what came  
21 of that. So I'm not too sure what facts did come of  
22 that, as the campaign.  
23 Q But at least on what we're looking at so  
24 far, it looks like there's an allegation of fraud, but  
25 it's not specific as to was exactly happened yet.

Page 28

1 Would you agree with that?  
2 MR. ZAKHEM: Object to form and foundation.  
3 That's not a campaign statement.  
4 Q (By Mr. Bowman) Well, you said earlier  
5 that the campaign did believe there was fraud at this  
6 point, but wasn't sure exactly what had happened yet;  
7 is that true?  
8 MR. ZAKHEM: When are you talking about?  
9 Object to form and foundation. At what time are you  
10 talking?  
11 MR. BOWMAN: We're still on November 4th.  
12 MR. ZAKHEM: Are you asking about Exhibit  
13 64, in particular?  
14 MR. BOWMAN: Exhibit 64 and 63, that we  
15 were just talking about, that there were allegations  
16 regarding fraud. He said he understood that was the  
17 campaign's position, but they were looking at the  
18 facts.  
19 Q (By Mr. Bowman) So my question is: They  
20 were -- they believed there was fraud without looking  
21 at all the facts yet; is that true?  
22 A I believe that there were -- I believe they  
23 were looking into the facts and believing there was  
24 fraud.  
25 Q And I'm going to play a part of Exhibit 65.

Page 29

1 communication at the campaign about these kind of  
2 statements and whether there is a need to go on the  
3 record and correct them?  
4 MR. ZAKHEM: I'll object to the extent it  
5 seeks privileged or work product information.  
6 If you can answer without disclosing any of  
7 that, please proceed.  
8 A Again, Mr. Bowman, I lost track of what  
9 that question was again.  
10 Q (By Mr. Bowman) Was there any kind of  
11 internal discussion about whether there was a need to  
12 correct statements made by Giuliani at this Four  
13 Seasons Landscaping press conference?  
14 A I believe at this point in time, I mean,  
15 right after an election, we were still investigating  
16 what happened and trying to get facts together.  
17 Q I'm going to show you Exhibit 66, where  
18 Donald Trump tweets that Dominion deleted 2.7 million  
19 Trump votes nationwide; and he cites as a source there  
20 Chanel Rion and OAN.  
21 Was OAN a source that the campaign  
22 frequently relied on?  
23 MR. ZAKHEM: Object to form and foundation.  
24 This isn't a campaign statement.  
25 Q (By Mr. Bowman) Do you -- is this a

Page 38

1 campaign statement by Donald J. Trump?  
2 A It looks like a quote from Chanel Rion.  
3 That's --  
4 Q Was it the position of the campaign at this  
5 time, on November 12th, 2020, that Dominion had  
6 deleted 2.7 million votes?  
7 A It looks like to me that President Trump is  
8 just saying what Chanel Rion said. It looks like a  
9 quote.  
10 Q So -- okay. Let's move on from this. I'm  
11 going to get to -- have you reviewed the documents  
12 produced by the campaign in this litigation?  
13 A I went through it. I didn't go in depth.  
14 Q So I'm showing you what's been marked as  
15 Exhibit 68, which is the batch of documents produced  
16 by the campaign.  
17 And I'm going to start at the beginning of  
18 this email chain. On November 13th, Zach Parkinson  
19 emails Jacki -- can you say that name for me, or not?  
20 If you can't --  
21 A No, sir.  
22 Q -- Jacki Kotkiewicz, Dean Cleary, and Matt  
23 VanHyfte, About to send you all a Dominion-related  
24 project we need to look at, so don't head to the bar.  
25 I'll send specific things we need to look into and

Page 39

1 substantiate or debunk.  
2 Who is Zach Parkinson?  
3 A He was the director of research for comms.  
4 Q And then were Jacki, Dean Cleary, and Matt  
5 VanHyfte each part of the research team?  
6 A Yes, sir.  
7 Q And so Zach sends a list of topics that he  
8 wants them to look into regarding Smartmatic and  
9 Dominion, allegations that they're tied to Venezuela,  
10 et cetera. And this is at 6 p.m., on November 13th.  
11 About three hours later, Dean Cleary  
12 responds saying, We're making great progress. We've  
13 got an 11-page document right now. It's slow and  
14 tedious. I don't have an end prediction, but we got  
15 maybe three-quarters of what you asked on paper.  
16 So do you recall what the impetus -- or  
17 what initiated the need for this research?  
18 A I think at this point in time, it was  
19 probably trying to track down any leads that we could  
20 get.  
21 Q Anything regarding election fraud, right?  
22 A Sure.  
23 Q And then Zach Parkinson says, "Let's cut  
24 this off at 10:30. Have more dead voters we'll need  
25 to get to in the morning."

Page 40

1 Do you know what that's in reference to?  
2 A I would think he means -- it looks more  
3 like a -- I wouldn't say joking around with it, but  
4 there was a lot of talk about dead voters voting  
5 within this election. So I would think he was just  
6 referring to what we've been looking into.  
7 Q So that's similar to the dead voters  
8 allegation that Giuliani was making in the press  
9 conference we just looked at, right?  
10 MR. ZAKHEM: Object to form. Foundation.  
11 A I think there was a lot of talk about  
12 people who passed away that voted in this election. I  
13 don't know if it ties directly to the same individuals  
14 that Mr. Giuliani was talking about, but there's a --  
15 there was a lot of discussion about looking into  
16 people who passed away that voted in this election.  
17 Q (By Mr. Bowman) So the campaign was  
18 looking at multiple theories for trying to show that  
19 the election was fraudulent?  
20 MR. ZAKHEM: Object to form and foundation.  
21 A I would -- I would say there's multiple  
22 theories, and the campaign was just trying to weed  
23 out -- and just -- we were looking into what possible  
24 fraud there was.  
25 Q (By Mr. Bowman) And you said, "weed out."

Page 41

1 Was there an attempt to weed out what were, you know,  
2 completely invalid theories?  
3 A I would say that it's -- we focused on  
4 things that were more possible or something to prove,  
5 right? So you can get -- you can quantify votes of  
6 people who passed away, right?  
7 So I would think that it's more of like  
8 what -- a priority or other things -- you know, like  
9 what things -- you have a list of priorities: which  
10 ones are most important, which ones can we get done?  
11 And that would probably be on that list of  
12 things that they put together.  
13 Q So were you a part of any of these  
14 discussions at the time?  
15 A No, sir.  
16 MR. ZAKHEM: Object to foundation.  
17 What discussions are we talking about?  
18 MR. BOWMAN: Within this email.  
19 A No, sir.  
20 Q (By Mr. Bowman) So let me scroll down to  
21 the actual memo that's attached to that email that  
22 says, Dominion, Smartmatic, Sequoia, and Venezuela.  
23 Just a few of the core findings here appear  
24 to be Dominion and Smartmatic are independent  
25 companies that split from each other. There's no

Page 42

1 apparent relationship between Smartmatic and the  
2 Spanish company Indra. Dominion has not direct ties,  
3 or should be no direct ties, to Venezuela.  
4 And scrolling down, There's no evidence  
5 that Dominion's CEO or any other leader of the group  
6 has ties to Antifa.  
7 And this is referring specifically to an  
8 Internet rumor that Dominion's director of product  
9 safety, Dr. Eric Coomer, had ties to Antifa. But  
10 there it concludes: There's no evidence Coomer is a  
11 member or has any ties to Antifa.  
12 Did I identify some of those key points  
13 correctly?  
14 A Yes, sir.  
15 Q So who was this memo ultimately circulated  
16 to?  
17 A In the time frame, in -- November 13th; was  
18 it?  
19 Q Thirteenth and 14th.  
20 A Thirteenth and 14th. I would -- I would  
21 say it went to our comms team and I would -- I would  
22 think the legal team as well.  
23 Q Do you know that, or are you saying that  
24 should have happened?  
25 A Should have happened given that it's a

Page 43

1 research department on something that we were trying  
2 to track down as possible ties for it.  
3 Q Do you know if this memo ever got to Rudy  
4 Giuliani?  
5 A No. I think this -- this is kind of where  
6 things get a little different. When Rudy -- when Mr.  
7 Giuliani -- I apologize. I've always called him Rudy.  
8 So when Mr. Giuliani came in as legal -- or  
9 as a lawyer, he -- he and his team took over a  
10 conference room. And we spent, I mean, years setting  
11 up an internal process of where documents would go,  
12 who sees them, and then making sure that people review  
13 them, and approvals.  
14 But when Mr. Giuliani came in with his  
15 team, the -- that whole approval chain, that whole --  
16 everything pretty much went out the window.  
17 And at this point in time, the campaign, as  
18 an entity, as itself, was winding down; and so we had  
19 a lot of people leaving the campaign.  
20 The majority of individuals within the  
21 campaign -- the last day was November 15th. That  
22 doesn't mean that these individuals were in the  
23 office. A lot of them cleaned out their desks or they  
24 left. So there was a lot of moving parts.  
25 And I think when -- I think when Mr.

Page 44

1 Giuliani came in, there wasn't that same approval  
2 process and the documents flowing in the right  
3 direction, that we set up for years.  
4 So to answer your question: The likelihood  
5 that Mr. Giuliani saw this is probably slim.  
6 Q And can you pinpoint for me when the moment  
7 in time is that things changed, where you said you had  
8 a good document flow and then things weren't as good?  
9 When was that switch?  
10 MR. ZAKHEM: Object to form.  
11 A I'm not too sure on the exact date. It was  
12 obviously right after the election. We had a lot of  
13 people moving.  
14 Like I said before, we were on the -- the  
15 campaign itself was winding down. We were liquidating  
16 assets. We were just -- we were moving everything out  
17 and trying to get ready to turn over an office.  
18 And I'm not too sure on when that time  
19 frame was when Mr. Giuliani came in with his team and  
20 took over a conference room.  
21 But I do know it would have been -- I don't  
22 even want to -- I don't even want to guess on that  
23 one, Mr. Bowman. It was right after the election. I  
24 just don't know the time frame.  
25 Q (By Mr. Bowman) Okay. So right after the

Page 45

1 election, sometime within a week or two after the  
2 election?  
3 A I'm not too sure, sir.  
4 Q So before that time period, it was standard  
5 practice for a memo like this to go to your comms  
6 department; is that right?  
7 A Yes, sir.  
8 Q And then that ultimately would affect what  
9 type of communications were made by the campaign,  
10 right?  
11 A Yes, sir.  
12 Q But when Giuliani came in and other things  
13 were going on, that chain wasn't necessarily going the  
14 same way?  
15 A Yes, sir.  
16 Q And what about communications to the legal  
17 department? Was that also similarly in an altered  
18 state or disrupted state after the election?  
19 A I think there was a -- there was a split --  
20 on the legal department, I would -- in my mind, I'm  
21 thinking the campaign legal department; is that  
22 correct?  
23 Q Right.  
24 A The internal legal counsel, whatever.  
25 There was a -- there was a separation between the two,

Page 46

1 with Mr. Giuliani and, like, the main campaign legal  
2 team.  
3 So the possibility that our legal team and  
4 that structure -- let me backtrack real quick. So  
5 when Mr. Giuliani came in, a lot of senior staff -- we  
6 were on the 14th floor of the office in Arlington,  
7 Virginia.  
8 And when Mr. Giuliani came in with his  
9 team, there was a number of personnel that moved up to  
10 the 15th floor, a lot of leadership and some other  
11 lawyers that were a part of the campaign.  
12 And they all moved up to a different floor.  
13 So there was a separation of communication. And the  
14 likelihood that our legal team reviewed that doc is --  
15 I don't know.  
16 Q Do you mind --  
17 THE DEPONENT: So real quick: I've got  
18 like a 12-year-old dog who is just whining by the  
19 door. I'm just going to let her out real quick.  
20 MR. BOWMAN: Do you need to take a break  
21 right now?  
22 THE DEPONENT: I mean, it's up to you guys.  
23 MR. BOWMAN: Or if you just want to let the  
24 dog out real quick, that's fine.  
25 MR. ARRINGTON: This is Barry Arrington.

Page 47

1 If he doesn't need a break, I do. So why don't we  
2 take a five-minute break.  
3 MR. BOWMAN: That's fine.  
4 THE VIDEOGRAPHER: Going off the record.  
5 The time is 4:19.  
6 (Recess taken.)  
7 THE VIDEOGRAPHER: Back on the record. The  
8 time is 4:27.  
9 Q (By Mr. Bowman) So, Mr. Dollman, I wanted  
10 to revisit what we were just talking about. You said  
11 it was standard practice for a memo like this to --  
12 would it go to comms and then to legal, or what  
13 exactly was the standard practice?  
14 A With a memo like this, it would be comms --  
15 so research is actually in the comms department. So  
16 it would stay within its department, but it would go  
17 to normally the director of comms.  
18 Q And can you tell me --  
19 A And --  
20 Q -- tell me the director of comms again.  
21 A Tim Murtaugh.  
22 Q So it would go to Mr. Murtaugh. And then  
23 what?  
24 A And then normally -- I mean, if it was  
25 something like this and it involved legal, I would

Page 48

1 think it -- normally it would go to legal, if it had  
2 this type of information in it on the research side.  
3 But it would be up to Tim Murtaugh within  
4 comms to either delve in to make sure it gets to legal  
5 or legal needs to see it or something.  
6 Q And the purpose of getting it to comms and  
7 legal would be to ensure that any statements made by  
8 the campaign had this information available, right?  
9 A Yeah, I would think with comms for sure.  
10 Legal -- well, you guys know it usually takes a lot  
11 longer to get something back from legal.  
12 So the statements -- there's not usually a  
13 whole lot from our legal department with statements.  
14 So like a campaign itself would be comms, would be the  
15 normal means of communicating this.  
16 Q But the standard practice of getting this  
17 to comms and to legal was disregarded when Rudy  
18 Giuliani became part of the campaign office?  
19 MR. ZAKHEM: Object to form.  
20 A It meant -- it meant -- since it -- I do  
21 not know if this made it to legal or any type of  
22 verification. And when I say, "legal," I mean the  
23 campaign legal, that we had in house.  
24 Q (By Mr. Bowman) And who was the campaign  
25 legal in house?

Page 49

1 A So that would be -- Matt Morgan was -- I  
2 think he was chief counsel or something in 2020.  
3 Q Who else?  
4 A There was -- I mean, there was a decent  
5 sized legal department. Normally, if it was Matt  
6 Morgan -- I mean, he was more the director on it, so  
7 it would probably just filter from there.  
8 Q So should something like this have made it  
9 to legal?  
10 MR. ZAKHEM: Object to form. Foundation.  
11 Calls for a legal conclusion.  
12 Q (By Mr. Bowman) You can still answer.  
13 Should this have made it to legal?  
14 A I think everything at this point in time  
15 should just be reviewed to make sure that we all have  
16 everything en route, right?  
17 So if it went to legal, should it have? I  
18 haven't read the whole thing. Something like this,  
19 what you just pointed out.  
20 Q Right. And that's what I want to focus  
21 on --  
22 A I think it focused on -- say again?  
23 Q Sorry. Go ahead.  
24 A I think it depends on what legal's working  
25 on or if they know about anything or if they're

Page 50

1 looking into this.  
2 I mean, if it's Internet hearsay or  
3 something -- the research team just wanted to review  
4 it and see if there was any ties, then it may not go  
5 to legal. But . . .  
6 Q Are you saying this was Internet hearsay?  
7 A Well, that's what you said earlier, right?  
8 Q Well, I'm asking you.  
9 A You said that they were researching it  
10 because of the Internet, something. I believe it was  
11 earlier in the emails.  
12 Q So today, as you sit here as a  
13 representative of the campaign, do you agree that  
14 there's no evidence Coomer is a member or has any ties  
15 to Antifa?  
16 MR. ZAKHEM: Object to foundation and  
17 privilege on attorney-client communication and work  
18 product -- product.  
19 To the extent the witness can answer  
20 without divulging either of those, he can respond.  
21 A I don't have a response.  
22 Q (By Mr. Bowman) Well, let me ask again --  
23 well, you don't have a response because your  
24 understanding is it's been relayed to you through  
25 counsel; is that correct?

Page 51

1 MR. ZAKHEM: Or that it's work product,  
2 right?  
3 Q (By Mr. Bowman) What about at this time:  
4 on November 14th, 2020? The campaign knew that there  
5 was no evidence Coomer was a member or had any ties to  
6 Antifa, correct?  
7 A I think with a quick research -- I wouldn't  
8 say that the campaign knew that he didn't have any  
9 ties to Antifa.  
10 I think if, you know, you review the  
11 Facebook, like, was it not elected; it must mean  
12 deleted. There's a lot of evidence within the  
13 Facebook; and I don't know if, like, they didn't see  
14 that information.  
15 But there's a lot of things where I  
16 wouldn't say that Coomer is not a member of Antifa,  
17 and I wouldn't say that -- is it Coomer or Coomer  
18 (pronouncing)?  
19 Q Coomer (pronouncing).  
20 A Say again?  
21 Q Coomer (pronouncing).  
22 A Coomer (pronouncing).  
23 I wouldn't say that -- I mean, I don't know  
24 how they drew that conclusion, looking -- I mean, just  
25 looking at his Facebook posts, in general.

Page 52

1 So, no, I don't think -- I don't think that  
2 there is no evidence that he is absolutely not tied to  
3 Antifa.  
4 Q So you're disagreeing with the conclusion  
5 from your research department?  
6 MR. ZAKHEM: Object to form. Foundation.  
7 A I think that within general of -- knowing  
8 now and seeing the other documents that were given to  
9 me for review, I would say that they might have jumped  
10 and said that there's no evidence in -- that he's a  
11 member or has ties to Antifa.  
12 Q (By Mr. Bowman) What else was given to you  
13 that changed your opinion?  
14 MR. ZAKHEM: Object based on privilege and  
15 work product.  
16 To the extent you can respond without  
17 divulging either of those, please proceed.  
18 A Well, I think in general here were the  
19 numerous Facebook posts by Coomer.  
20 Q (By Mr. Bowman) But you're aware those  
21 Facebook posts are part of this memo, correct?  
22 A All of his Facebook posts?  
23 Q Well, we have at least a couple here. So  
24 you're disagreeing -- I just want to be clear: You're  
25 disagreeing with your research department's conclusion

Page 53

1 that there was no evidence that Eric Coomer was a  
 2 member of Antifa, and that's your position as a  
 3 representative of the Trump campaign; is that correct?  
 4 A Yeah, I -- that is correct.  
 5 Q And what is that based on?  
 6 MR. ZAKHEM: Object to privilege, both work  
 7 product and attorney-client communication.  
 8 MR. BOWMAN: Yeah, but this --  
 9 MR. ZAKHEM: If you can answer without  
 10 divulging either of those, please proceed.  
 11 MR. BOWMAN: This is offensive use, John.  
 12 I mean, you're using a privilege to say he disagrees  
 13 with a document he's produced, but you're not telling  
 14 me what evidence he's looked at.  
 15 Do you have a response to that?  
 16 MR. ZAKHEM: I'm just instructing the  
 17 witness not to give you any privileged information.  
 18 You can ask whatever questions you want.  
 19 So long as he doesn't provide you with  
 20 privileged information, you can ask anything and he  
 21 can answer.  
 22 Q (By Mr. Bowman) Okay. So all I'm asking  
 23 is: What evidence have you seen that makes you  
 24 disagree with the Trump campaign's research department  
 25 that concluded Eric Coomer -- that there's no evidence  
 Page 54

1 that he's a member of Antifa?  
 2 MR. ZAKHEM: Same objection. Same  
 3 instruction.  
 4 A And I guess my issue is: What evidence did  
 5 this research department have at the time of making  
 6 and drawing this conclusion and what type of time  
 7 frame?  
 8 I mean, we're looking at a very short  
 9 window of when they turned this document around. And  
 10 the -- the depth of his Facebook posts and, like, what  
 11 he seems to know about Antifa -- maybe he follows them  
 12 or something.  
 13 But I wouldn't say there's absolutely no  
 14 evidence that Coomer is -- has zero ties to Antifa.  
 15 Q (By Mr. Bowman) So you're saying today  
 16 that the Trump campaign research department did not  
 17 have adequate time to adequately research whether  
 18 Coomer had ties to Antifa?  
 19 MR. ZAKHEM: Object to form.  
 20 A In this time period, when the turnaround  
 21 time was very quick, I don't -- I don't think they had  
 22 an adequate amount of time for this document, to draw  
 23 the absolute conclusion that there's no ties.  
 24 Q (By Mr. Bowman) So they didn't have enough  
 25 time to research the issue, but they did go on and  
 Page 55

1 make representations stating that Coomer was a member  
 2 of Antifa; is that right?  
 3 A Where is that at?  
 4 Q Well, we're going to go through that next.  
 5 But I'm asking you based on your memory.  
 6 MR. REAGOR: Michael Reagor. Object to  
 7 form.  
 8 Q (By Mr. Bowman) So let's go to November  
 9 17th, a couple days later. Eric Trump tweets about  
 10 Eric Coomer and quotes that: Don't worry about the  
 11 election. Trump's not going to win. I made F'ing  
 12 sure of that.  
 13 So now Eric Trump is representing that  
 14 Coomer was on an Antifa conference call, and he's  
 15 citing the report attached in that tweet from Gateway  
 16 Pundit.  
 17 Did Eric Trump get the memo that we just  
 18 discussed?  
 19 A Eric -- Eric Trump was not a part of the  
 20 campaign.  
 21 Q So you wouldn't circulate any kind of  
 22 campaign memos to Eric Trump?  
 23 A No, sir. He wasn't a part of the campaign.  
 24 Q So when Eric Trump made representations  
 25 regarding the campaign, he hadn't been provided any  
 Page 56

1 information from the campaign?  
 2 MR. ZAKHEM: Object to form and foundation.  
 3 What -- what representations are you  
 4 talking about, Counsel?  
 5 MR. BOWMAN: The one I have up on the  
 6 screen.  
 7 MR. ZAKHEM: And where does it say "Trump  
 8 campaign" on there?  
 9 Q (By Mr. Bowman) Is Eric Trump not trying  
 10 to get Donald Trump elected?  
 11 MR. ZAKHEM: Counsel, we can have a  
 12 discussion or you can ask questions. If you're  
 13 discussing with me whether or not an individual  
 14 candidate or supporters of a candidate are part of a  
 15 campaign legally under election law or under corporate  
 16 law in the domestic jurisdiction, we can have that  
 17 discussion online -- offline.  
 18 But if you're asking the witness about a  
 19 question that is intentionally trying to mislead him  
 20 based on the facts of the exhibit in front of him, I'm  
 21 going to continue to object and point out the  
 22 misleading nature of the question.  
 23 Q (By Mr. Bowman) So it's your position that  
 24 Eric Trump was not a representative of the campaign;  
 25 is that true?  
 Page 57