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DISTRICT COURT, DENVER COUNTY, COLORADO  
1437 Bannock Street  
Denver, Colorado 80202

CASE NUMBER 2020CV34319  
FILED: October 4, 2021 10:28 AM  
FILING ID: 1ADC36D8EBB32  
CASE NUMBER: 2020CV34319

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ERIC COOMER, Ph.D., :  
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 :  
 Plaintiff, :  
 :  
 :  
 vs. :  
 :  
 :  
 DONALD J. TRUMP FOR PRESIDENT, :  
 :  
 INC., SIDNEY POWELL, SIDNEY :  
 :  
 POWELL, P.C., RUDOLPH GIULIANI, :  
 :  
 JOSEPH OLTMANN, FEC UNITED, :  
 :  
 SHUFFLING MADNESS MEDIA, INC. :  
 :  
 dba CONSERVATIVE DAILY, JAMES :  
 :  
 HOFT, TGP COMMUNICATIONS LLC :  
 :  
 dba THE GATEWAY PUNDIT, :  
 :  
 MICHELLE MALKIN, ERIC METAXAS, :  
 :  
 CHANEL RION, HERRING NETWORKS, :  
 :  
 INC. dba ONE AMERICA NEWS :  
 :  
 NETWORK and NEWSMAX MEDIA, INC., :  
 :  
 :  
 Defendants. :  
 :  
 ----- x

Veritext Virtual Zoom Videotaped  
Deposition of SEAN DOLLMAN, taken on Friday, August  
13, 2021, held in Arizona, commencing at 12:07 p.m.,  
before Jamie I. Moskowitz, a Certified Court  
Reporter and Certified Livenote Reporter.

1 communication or work product.  
 2 THE WITNESS: I don't have that  
 3 information, Mr. Bowman.  
 4 BY MR. BOWMAN:  
 5 Q Were there any discussions you're  
 6 aware of between comms or people that weren't legal  
 7 counsel about these kind of representations?  
 8 MR. ZAKHEM: Which representations are  
 9 you talking about?  
 10 MR. BOWMAN: The ones we're looking at  
 11 in this highlighted paragraph and the next  
 12 paragraph, that Eric Coomer has committed some  
 13 crime and rigged the election?  
 14 MR. ZAKHEM: Referring to Exhibit 68  
 15 or, excuse me, Exhibit 3, correct?  
 16 MR. BOWMAN: Exhibit 3, yes.  
 17 BY MR. BOWMAN:  
 18 Q Were there any internal discussions of  
 19 the campaign not involving legal counsel about these  
 20 statements by Rudy Giuliani?  
 21 A Not to my knowledge.  
 22 Q And you're not aware of any  
 23 communication after this with Rudy Giuliani about  
 24 whether to continue making statements like this?  
 25 MR. ZAKHEM: Object to -- on the

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1 grounds of privilege. Any communication made  
 2 by Mr. -- between the campaign and Mr. Giuliani  
 3 after this date is privileged.  
 4 MR. BOWMAN: Are you taking a stance  
 5 that it's after this date, or are you saying  
 6 anything earlier than this?  
 7 MR. ZAKHEM: I'm saying -- my  
 8 objection stands as it is. I'm instructing the  
 9 witness not to respond to that question on the  
 10 grounds of privilege.  
 11 BY MR. BOWMAN:  
 12 Q Did the campaign coordinate at all  
 13 with OAN on researching these issues?  
 14 MR. ZAKHEM: Issues referenced in  
 15 Exhibit 3?  
 16 MR. BOWMAN: Yes.  
 17 MR. ZAKHEM: In these two paragraphs?  
 18 THE WITNESS: Not to my knowledge.  
 19 BY MR. BOWMAN:  
 20 Q Are you aware of OAN ever coordinating  
 21 with the campaign on anything?  
 22 A Not to my knowledge, no, sir.  
 23 Q Do you know if OAN was a news source  
 24 that the campaign relied upon?  
 25 A Not to my knowledge.

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1 Q Do you know if Newsmax was a source of  
 2 news that the campaign relied upon?  
 3 A Not to my knowledge, again.  
 4 Q Would you agree that Rudy Giuliani's  
 5 statements alleging that Eric Coomer is a criminal  
 6 who helped commit election fraud were reckless?  
 7 MR. ZAKHEM: Object to form,  
 8 foundation and calls for a legal conclusion.  
 9 THE WITNESS: Sir, I'm not -- I'm not  
 10 a lawyer. I couldn't come up with a legal  
 11 conclusion on this one.  
 12 BY MR. BOWMAN:  
 13 Q You're not aware of any information  
 14 the campaign had that supported the truth of these  
 15 statements regarding Eric Coomer being a criminal?  
 16 MR. ZAKHEM: Instruct the witness not  
 17 to answer if it would reveal any privileged  
 18 information.  
 19 THE WITNESS: I believe it's  
 20 privileged.  
 21 BY MR. BOWMAN:  
 22 Q I'm going to pull up Plaintiffs'  
 23 Exhibit 7. This was introduced before, but we  
 24 haven't looked at it. This is a Politico article  
 25 about -- titled, "Trump Campaign Cuts Sidney Powell

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1 from President's Legal Team." This is on  
 2 November 22nd of 2020, just a few days later.  
 3 And this statement here I wanted to  
 4 direct you to states, "Sidney Powell is practicing  
 5 law on her own, Trump's personal lawyer  
 6 Rudy Giuliani and campaign lawyer Jenna Ellis said  
 7 in the statement. She is not a member of the Trump  
 8 legal team. She is also not a lawyer for the  
 9 president in her personal capacity."  
 10 Are you aware of why there was a need  
 11 to issue this kind of statement on  
 12 November 22nd of 2020?  
 13 A I don't know.  
 14 Q Are you aware of what Powell's  
 15 communications with the Trump Campaign were at this  
 16 time?  
 17 MR. ZAKHEM: Object to form.  
 18 THE WITNESS: Is that privileged  
 19 information?  
 20 BY MR. BOWMAN:  
 21 Q He just objected to form. He hasn't  
 22 instructed you not to answer.  
 23 A What was the question again? Am I  
 24 aware --  
 25 Q Of Sidney Powell's communications with

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1 BY MR. BOWMAN:  
2 Q Okay. What was the -- was there any  
3 communication directly between the Trump Campaign  
4 and Joseph Oltmann?  
5 A Not to my knowledge.  
6 Q At the time that the campaign -- or  
7 let me back up. At the time that Donald Trump,  
8 Eric Trump, Rudy Giuliani and Sidney Powell were  
9 advancing theories of election fraud deriving from  
10 Joseph Oltmann's statements, was the campaign aware  
11 that Oltmann was a conservative podcast host?  
12 MR. ZAKHEM: Object to form.  
13 THE WITNESS: What time frame was  
14 this?  
15 BY MR. BOWMAN:  
16 Q November of 2020.  
17 A I don't know.  
18 Q Was the campaign aware that Oltmann  
19 had an ownership interest and a financial interest  
20 in his podcast?  
21 MS. HALL: Object to form,  
22 Andrea Hall.  
23 THE WITNESS: Are you asking if he had  
24 a for-profit business?  
25

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1 BY MR. BOWMAN:  
2 Q I'm asking if the campaign was aware  
3 of that in November of 2020?  
4 A I don't know.  
5 Q Was the campaign aware that he was a  
6 Trump supporter who had held rallies in support of  
7 former President Trump?  
8 A I don't know.  
9 Q Was the campaign aware that he had  
10 made unsubstantiated allegations of election fraud  
11 even before the election?  
12 MR. ZAKHEM: You broke up on that.  
13 Can you say it again?  
14 BY MR. BOWMAN:  
15 Q Yes. Was the campaign aware that  
16 Joseph Oltmann had made unsubstantiated allegations  
17 of election fraud even leading up to the election?  
18 MR. ZAKHEM: Object to form.  
19 THE WITNESS: Not to my knowledge.  
20 BY MR. BOWMAN:  
21 Q And you're aware that the original  
22 statements asserting that Dr. Coomer was part of an  
23 Antifa conference call and rigged the election  
24 originated with Joseph Oltmann, correct?  
25 A Correct.

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1 Q Are you aware that Joseph Oltmann was  
2 scheduled and ordered to appear for his deposition  
3 in Colorado this week to testify on the basis of  
4 those statements and support for those statements  
5 and that he refused to appear?  
6 MS. HALL: Object to form.  
7 THE WITNESS: I am -- I am aware now,  
8 sir.  
9 BY MR. BOWMAN:  
10 Q Does that at all change your opinion  
11 regarding whether the research the Trump Campaign  
12 did into the Eric Coomer allegations was true or  
13 not?  
14 MS. HALL: Object to form.  
15 THE WITNESS: I believe all research  
16 was at the direction of legal counsel.  
17 BY MR. BOWMAN:  
18 Q We have been looking at research that  
19 you produced that you said was for comms, correct?  
20 A That comms had an internal memo.  
21 Q Right.  
22 A But it wasn't produced.  
23 Q And this internal memo said -- I'm  
24 saying "produced" because it was produced to us in  
25 the lawsuit, so I'm sorry if it's --

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1 A Oh, okay.  
2 Q The internal memo, again, looking at  
3 it states, "There's no evidence that Dominion's CEO  
4 or any other leader of the group has ties to Antifa,  
5 and there's no evidence Coomer is a member or has  
6 any ties to Antifa."  
7 And I recall that during your first  
8 deposition, or first part, you stated you had doubts  
9 as to the truth of this statement. Now that  
10 Mr. Oltmann has refused to appear for his  
11 deposition, has that changed your opinion regarding  
12 whether these statements are true or not?  
13 MS. HALL: Object to form.  
14 THE WITNESS: I think -- not -- I  
15 think all -- all litigation, like I said  
16 before, was at the direction of legal counsel,  
17 and I -- this was done by comms without the  
18 direction of legal counsel.  
19 So anything at the direction of legal  
20 counsel was anticipated, and I believe that's  
21 privileged information after that.  
22 BY MR. BOWMAN:  
23 Q Let me back up. I'm only asking you  
24 about this memo, comms, that has been produced, and  
25 there's been no assertion that this memo is

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1 privileged. And this memo concludes that Dr. Coomer  
 2 has nothing to do with Antifa, that there's no  
 3 evidence supporting that he's a member or has any  
 4 ties to Antifa.  
 5 You stated at your prior deposition  
 6 that you had reasons to doubt that, but you wouldn't  
 7 share exactly why. Has the fact that Mr. Oltmann  
 8 has now refused to appear for his deposition changed  
 9 your opinion on the truth of these statements?  
 10 MR. ZAKHEM: Object to form.  
 11 THE WITNESS: My opinion hasn't  
 12 changed, sir.  
 13 BY MR. BOWMAN:  
 14 Q Wouldn't the fact that he's failed to  
 15 appear and support his statements corroborate the  
 16 statements here that there's no evidence Coomer is a  
 17 member or has any ties to Antifa?  
 18 MR. ZAKHEM: Object to form.  
 19 THE WITNESS: I don't know why  
 20 Mr. Oltmann would not show up or why he would  
 21 not be there. That's something you would have  
 22 to ask Mr. Oltmann.  
 23 BY MR. BOWMAN:  
 24 Q And, again, with regards to why the  
 25 campaign had any reason to rely on the accuracy of

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1 Oltmann's statements, you are claiming privilege as  
 2 to that entire answer; is that correct?  
 3 THE COURT REPORTER: You are or  
 4 aren't?  
 5 MR. BOWMAN: I'm asking if they are.  
 6 And maybe that's a question for John.  
 7 MR. ZAKHEM: Yeah. I'm instructing  
 8 the witness not to respond with any privileged  
 9 information to any question. So he can answer  
 10 if he's got non-privileged information that's  
 11 responsive to your question.  
 12 THE WITNESS: Yeah. I think, like I  
 13 said before in the last deposition, I wasn't  
 14 basing it off of Mr. Oltmann's statements or  
 15 anything alone. I mean, there is -- like I  
 16 said before, there's a whole list of different  
 17 social media posts by Mr. Coomer -- Coomer.  
 18 And there's a lot of different things that he  
 19 has said or reposts or anything else that --  
 20 that's where I would say that this  
 21 information -- I mean, that's why I don't agree  
 22 with this one at the time.  
 23 MR. BOWMAN: Yeah. And objection,  
 24 nonresponsive.  
 25

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1 BY MR. BOWMAN:  
 2 Q My question was, in your Motion to  
 3 Dismiss, the Trump Campaign's Motion to Dismiss, you  
 4 state that you had every reason to rely on the  
 5 accuracy of Joseph Oltmann's reports regarding  
 6 Plaintiff.  
 7 But today as you sit here as a  
 8 representative of the campaign, you cannot testify  
 9 as to any reason you're relying on the accuracy  
 10 because that would intrude upon privilege; is that  
 11 your position?  
 12 A Yes.  
 13 MR. REAGOR: Michael Reagor, object to  
 14 form.  
 15 MR. ZAKHEM: Yes. That's our  
 16 position.  
 17 BY MR. BOWMAN:  
 18 Q So with regards to Topic 10 of the  
 19 deposition notice, any knowledge or connection with  
 20 Joseph Oltmann obtained prior to or following your  
 21 publication, authorization or ratification of  
 22 statements, you have no responsive information to  
 23 that?  
 24 MR. ZAKHEM: No, that's not correct.  
 25 He's -- he's responded to a number of questions

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1 from you in the prior session on that topic in  
 2 which he did provide information about the  
 3 knowledge of the campaign, about Mr. Oltmann,  
 4 about the publications, authorizations, or  
 5 ratifications of statements made by others,  
 6 none of which were made by the campaign, and  
 7 all -- none of which were ratified by the  
 8 campaign about Dr. Coomer and Dominion Voting.  
 9 He's given you a litany of responses  
 10 on that topic. You just don't like them.  
 11 MR. BOWMAN: Today, his answer as to  
 12 any knowledge of communications with Oltmann --  
 13 BY MR. BOWMAN:  
 14 Q The answer is you have no knowledge,  
 15 correct?  
 16 A Any communication with Mr. Oltmann?  
 17 Q Yes.  
 18 A From the campaign directly?  
 19 Q Right.  
 20 A Not to my knowledge.  
 21 Q And regarding the question of why you  
 22 would trust Mr. Oltmann's statements, the answer was  
 23 that's privileged attorney/client, correct?  
 24 A I answered as to why we would trust  
 25 Mr. Oltmann's statements?

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1 Q Yes.  
2 MR. ZAKHEM: It's been asked and  
3 answered repeatedly.  
4 MR. BOWMAN: That's fine. I'll move  
5 on.  
6 BY MR. BOWMAN:  
7 Q Did any communications sent by the  
8 campaign for the purpose of fundraising mention the  
9 allegations against Dominion Voting or Dr. Coomer?  
10 A I don't know.  
11 Q Were you involved at all in those  
12 fundraising emails, letters, whatever they are?  
13 A No, I was not.  
14 Q Who would have been in charge of --  
15 I'm sorry. Who would have been in charge of those  
16 type of communications?  
17 A The fundraising team, depending on who  
18 it was with the -- what type of fundraising. So our  
19 vendors.  
20 Q Are you aware of whether any of that  
21 fundraising after November 3rd referred to  
22 challenging the election results?  
23 MR. REAGOR: Michael Reagor, object to  
24 form.  
25 THE WITNESS: Our fundraising efforts

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1 were based off of current events, so I would  
2 think, like, during that time frame in  
3 November, I'm sure there was some fundraising  
4 efforts that involved challenging election  
5 results.  
6 BY MR. BOWMAN:  
7 Q Are you aware of any coordination  
8 between the campaign and James Hoft in  
9 November/December of 2020?  
10 A I am not.  
11 Q Are you aware of any communications  
12 with Michelle Malkin regarding the Dominion or  
13 Eric Coomer allegations?  
14 A No, sir.  
15 Q Are you aware of any communication  
16 with Chanel Rion regarding communications? I'm  
17 sorry, regarding the Eric Coomer or Dominion  
18 allegations?  
19 A No, sir.  
20 Q Are you aware of the Trump Campaign  
21 coordinating with OAN regarding Dominion or  
22 Dr. Coomer?  
23 A No, sir.  
24 Q Who would have that type of  
25 coordination, if it happened, go through most

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1 likely?  
2 A Are you asking about communication  
3 they had with other individuals, outside  
4 individuals?  
5 Q Right. Communication with news  
6 sources or any sort of conservative pundits about  
7 theories of election fraud during November and  
8 December of 2020?  
9 A I don't --  
10 MR. REAGOR: Object to form, Michael  
11 Reagor.  
12 BY MR. BOWMAN:  
13 Q I'm sorry. What's the answer?  
14 A I don't know.  
15 Q You don't know who would handle that  
16 communication?  
17 A No, sir.  
18 Q Are you aware of whether the campaign  
19 ever coordinated with news sources or conservative  
20 pundits about statements it wanted to make to the  
21 public?  
22 MR. ZAKHEM: Object.  
23 MR. REAGOR: Object to form, Michael  
24 Reagor.  
25 THE WITNESS: I mean, we -- we had

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1 interviews with different news stations and  
2 networks and -- I mean, there were multiple  
3 different things during the election that, you  
4 know, they went on TV and discussed. So --  
5 BY MR. BOWMAN:  
6 Q Right. And I guess my question is,  
7 was the campaign ever being sent information about  
8 the Coomer or Dominion Voting allegations by any  
9 news sources or conservative pundits?  
10 MR. REAGOR: Object to form,  
11 Michael Reagor.  
12 THE WITNESS: Not to my knowledge.  
13 BY MR. BOWMAN:  
14 Q Have you communicated with people from  
15 comms or research who would have been the parties  
16 actually handling that kind of communication as part  
17 of your prep for today?  
18 A No, sir.  
19 Q So your response to that question is  
20 based on your own personal experience as the CFO; is  
21 that correct?  
22 MR. ZAKHEM: Object to form. Instruct  
23 the witness not to divulge any information that  
24 is privileged or work product in responding to  
25 that.

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1 THE WITNESS: I think any  
2 communication the campaign would have been  
3 aware of would have been within emails, and  
4 that would have been subject to your document  
5 protector or production, right?  
6 BY MR. BOWMAN:  
7 Q Let me just go through a list of  
8 names, and I think I'll probably know the answer to  
9 these. But are you aware of the campaign ever  
10 coordinating with Sidney Powell, Joseph Oltmann,  
11 Ron Watkins, Ali Alexander, Patrick Byrne,  
12 Christina Bobb or Mike Lindell during November and  
13 December of 2020 about any allegations regarding  
14 election fraud?  
15 MR. ZAKHEM: Object to form.  
16 THE WITNESS: Not to my knowledge,  
17 sir. I think that would be something you'd  
18 have to ask Mr. Giuliani.  
19 BY MR. BOWMAN:  
20 Q Do you recall whether Jenna Ellis was  
21 a member of that Giuliani legal team that relocated  
22 into campaign head quarters?  
23 A Jenna Ellis, to my knowledge, no, it  
24 was -- no one ever went to Jenna Ellis for  
25 information. No one ever asked Jenna Ellis for

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1 legal advice, and I don't believe -- I think she  
2 was, by title, a campaign lawyer. But if she was a  
3 part of Mr. Giuliani's team, I am unaware of her  
4 status within his team.  
5 Q What was the role of the campaign in  
6 any organization of what was called the  
7 Jericho March on December 12, 2020?  
8 MS. HALL: Object to form.  
9 THE WITNESS: What march was that,  
10 Mr. Bowman?  
11 BY MR. BOWMAN:  
12 Q The Jericho March on December 12th of  
13 2020.  
14 A All right. I have -- that came  
15 through -- I don't believe there was any -- anything  
16 from the campaign. I don't even know what that  
17 march is.  
18 Q Well, who would have been at the  
19 campaign helping organize any kind of rallies or  
20 marches during this time?  
21 A During this time?  
22 Q November and December of 2020.  
23 A I mean, we had -- we had an advance  
24 team, but I -- I don't know. It would have been --  
25 yeah, it would have been our advance team.

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1 Q What does that mean, "advance team"?  
2 A They were -- they were the team that  
3 would usually go out before the president. But I'm  
4 just trying to wrap my brain around rallies or  
5 events, because the campaign -- I can't recall a  
6 rally or event for the campaign.  
7 Q Did the campaign have any role in  
8 organizing the Stop the Steal rally on January 6th  
9 of 2021?  
10 A No, sir.  
11 Q Did the campaign provide any financial  
12 support for the Stop the Steal rally?  
13 A No, sir.  
14 MS. HALL: Object to form.  
15 THE WITNESS: No, sir.  
16 BY MR. BOWMAN:  
17 Q Are you aware of the campaign making  
18 any payments to Event Strategies Inc. after  
19 November 3rd of 2020?  
20 A I am not aware. I'm just trying to  
21 think of the time frame, but off the top of my head,  
22 no, sir.  
23 Q Were any payments made to  
24 American Media Consultants LLC in November, December  
25 and early January?

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1 A Yes, sir.  
2 Q What were those payments for?  
3 A What -- what was the entity again?  
4 Q American Media Consultants LLC.  
5 A The entity is wrong. I think you're  
6 asking for a different one.  
7 Q Which different one do you think I'm  
8 asking for?  
9 A You said American Media Consultants?  
10 Q Correct.  
11 A It's -- that's not the name of the  
12 entity I think you're referring to.  
13 American Made Media Consultants? Yes.  
14 Q Okay. I'm sorry. You're correct.  
15 In our Topic 17, we listed  
16 American Made Media Consultants. So are you aware  
17 of payments to American Made Media Consultants LLC  
18 after November 3rd of 2020?  
19 A Yes, sir.  
20 Q What were those payments for?  
21 A Fundraising efforts. Digital  
22 advertising.  
23 Q Did American Made Media Consultants  
24 handle digital advertising for the events on  
25 January 6th of 2021?

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