

<p>DISTRICT COURT, DENVER COUNTY, COLORADO 1437 Bannock Street Denver, CO 80202</p>	<p>DATE FILED: September 17, 2021 8:12 PM FILING ID: E9E5DD591D201 CASE NUMBER: 2020CV34319</p>
<p>ERIC COOMER, Ph.D., Plaintiff</p> <p>vs.</p> <p>DONALD J. TRUMP FOR PRESIDENT, INC., et al., Defendants</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
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<p style="text-align: center;">EXHIBIT C-2</p>	

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1 PURSUANT TO WRITTEN NOTICE and the
2 appropriate rules of civil procedure, the video
3 videoconferenced deposition of the authorized
4 representative of FEC UNITED by JOE OLTMANN, called for
5 examination by the Plaintiff, was taken remotely,
6 commencing at 9:13 a.m. on September 9, 2021, before
7 Laurel S. Tubbs, a Registered Professional Reporter,
8 Certified Realtime Reporter and Notary Public in and for
9 the State of Colorado.

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1 PROCEEDINGS
2 THE VIDEOGRAPHER: Here begins the
3 deposition of Joe Oltmann, corporate rep for FEC United.
4 Today's date is September 9th, 2021. The time is
5 10:14 a.m. Central Standard Time. This deposition is
6 being recorded live via Zoom.
7 Will the court reporter please do her read
8 on and swear in the witness.
9 THE REPORTER: One moment.
10 The attorneys participating in this
11 deposition acknowledge that I am not physically present
12 in the deposition room and that I will be reporting this
13 deposition remotely. They further acknowledge that in
14 lieu of an oath administered in person, the witness will
15 verbally declare his testimony in this matter is under
16 penalty of perjury. The parties and their counsel
17 consent to this arrangement and waive any objections to
18 this manner of reporting. Please indicate your agreement
19 by stating your name and your agreement on the record,
20 beginning with the taking attorney.
21 MR. SKARNULIS: Steve Skarnulis for the
22 plaintiff.
23 And, Laurel, I believe what we were doing
24 is appearances are being entered in the chat.
25 /////

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1 JOE OLTMANN,
2 having been first duly sworn or affirmed, was examined and
3 testified as follows:
4 EXAMINATION
5 BY MR. SKARNULIS:
6 Q. Good morning, Mr. Oltmann.
7 A. Good morning.
8 Q. Please state your name for the record.
9 A. Joe Oltmann.
10 Q. And, Mr. Oltmann, you're here as a
11 corporate representative of FEC United, right?
12 A. I was asked to stand in as the corporate
13 representative for FEC United.
14 Q. Okay. And in preparing for your deposition
15 testimony today on behalf of FEC United, did you review
16 the topics that were included in the deposition notice?
17 A. I did.
18 Q. And do you feel like you're prepared to
19 answer questions related to those topics today?
20 A. Mostly, yes. Yeah.
21 Q. Okay. Well, let me know if you -- if you
22 aren't on any one of the topics as we go on.
23 MR. SKARNULIS: I will note for the other
24 lawyers, as with other depositions, one objection from one
25 defendants' counsel is good for all.

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1 Q. (By Mr. Skarnulis) And, Mr. Oltmann, we're
2 doing okay so far, but I can tend to be a little of a slow
3 talker. And we don't want to talk over each other. So if
4 you can let me finish my questions, I'll certainly let you
5 finish your answers. Is that fair?
6 A. Yes.
7 Q. All right. Did you start FEC United?
8 A. I founded it, yes.
9 Q. Were there any other founders?
10 A. No. Well, there was other people that
11 were involved in it, but not that were responsible for
12 putting all the paperwork together.
13 Q. Okay. Who were the other people who were
14 involved in the inception of FEC United as an
15 organization?
16 A. There were hundreds of people in different
17 states.
18 Q. Were there any who were kind of leaders who
19 you dealt with regularly?
20 A. Yes. There are other leaders inside of
21 FEC, yes.
22 Q. Okay. Why did you start FEC?
23 A. How much time do you got? I thought we
24 only had two hours.
25 Q. Well, just generally. What prompted you to

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1 start FEC?
2 A. So -- so I got involved last March in the
3 Reopen Colorado Movement and helped start the Reopen
4 Movement across the country, because I was watching
5 businesses burn. I was watching people lose everything
6 they had. I was watching the Constitution be taken and
7 thrown in the trash kind of like it is being today and in
8 this case.
9 So, you know, that started and we were
10 able to get businesses back open. We were able to get
11 support for those businesses and file lawsuits and get
12 lawyers to do pro bono work and help people in the
13 community. I didn't get involved in this -- you know, I
14 had a couple friends, one committed suicide, which was
15 kind of a catalyst for me of getting pissed off over all
16 this stuff.
17 And so from there, I wanted to make sure
18 after we got back open that they couldn't continue down
19 this rabbit hole of destroying personal liberties for
20 individuals in our country. That's not what this country
21 stands for.
22 So I woke up one day and started looking
23 at the principles of our -- the foundation of our
24 country, and that's faith, giving people the ability to
25 go to church and worship, whether it be a church, mosque,

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1 synagogue. And not allowing the government to come in
 2 and take away spiritual food, which is as important as
 3 the food you eat.

4 On the education side, getting kids back
 5 to school and keeping masks off them. Following the
 6 science, not the junk science or the propaganda that's
 7 put in the left-wing media. And the weaponization of
 8 technology and media in order to push down social
 9 agendas, and to use our kids as political pawns, it
 10 became another glaring issue on the education side. So
 11 how we do get rid of critical race theory and gender
 12 fluidity and all these other things that are destroying
 13 our kids' minds when they can't even get math, science or
 14 English right.

15 And the last of which is commerce. How do
 16 we -- how do we protect small, medium businesses and
 17 protect our community and give them the ability to have a
 18 voice? Which they did not have at all. And, you know,
 19 organizations like the Chamber of Commerce were anemic,
 20 as the article in Time Magazine pointed out, they worked
 21 against the better interests of the people and decided
 22 for the people that they were the daddy and that they
 23 were going to do everything they could to effect and
 24 steer and secure the election the way they wanted it
 25 steered.

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1 So the organization also has another part,
 2 which is policy and politics, and that's getting people
 3 involved in the community. So it's a four-prong approach
 4 inside the organization.

5 (Telephone ringing.)

6 A. Sorry. I tried to turn off my stuff on my
 7 computer. It's not my phone that's ringing; it's my
 8 computer that's ringing, so I apologize.

9 But the policy and politics side, as an
 10 organization, we want to give people a strong voice and,
 11 you know, now we have a pretty large following across the
 12 nation and we have a pretty solid member base that grows
 13 every day.

14 And, you know, we're going to continue to
 15 push forward an organization to, you know, take away the
 16 authority of government to -- and these radical leftists
 17 in destroying, eroding our basic -- our most basic
 18 freedom in our country. So I started the organization
 19 because of that, because there's not a lot of
 20 organizations out there that do things boldly and stand
 21 up against this -- what I believe is shameful
 22 representation of selfishness and a thirst for power and
 23 greed.

24 And so it's -- we've been very effective
 25 in winning races and helping people get -- get to the

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1 place where they can restore things to the community.

2 Q. Okay. FEC United, then, has been around
 3 for about a year and a half; is that right?

4 A. Well, so FEC United has been around in an
 5 organic way since June, I think, of last year. And we
 6 got our -- June -- we got our -- or July. We got our
 7 acceptance as an organization in October of 2020.

8 Q. From the federal government?

9 A. From the IRS.

10 Q. Okay. And FEC United is a 501(c)(4),
 11 right?

12 A. It is.

13 Q. What is the -- what's the structure of the
 14 control of FEC United? Are there officers?

15 A. There are not.

16 Q. Okay. Now, Mr. Butler -- Stu Butler
 17 appeared at the courthouse for a deposition as referenced
 18 in the -- of the FEC, and he testified that he was the
 19 temporary president?

20 A. Well, he's not the -- he's the pro tem
 21 president. So he stepped into that position. There's
 22 nothing temporary about it. It's a president pro tem.
 23 So pro tem is I do this until someone is found in the
 24 search to take over that role -- the roles and
 25 responsibilities of the organization.

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1 Q. Who appointed Mr. Butler as president pro
 2 tem?

3 A. The board did.

4 Q. Okay. Who is on the board?

5 A. Six people.

6 Q. All right. And who are they?

7 THE DEPONENT: Is that a question I have
 8 to answer?

9 THE REPORTER: I'm sorry. I can't
 10 understand you, Mr. Oltmann.

11 THE DEPONENT: I said hold one second.
 12 I'll grab that information for you. 30 seconds.

13 A. Can we come back to that question just so
 14 I'm not wasting any time?

15 Q. Yeah, that's fine.

16 Do you recall any names off the top of your
 17 head?

18 A. Oh, yeah. So I know some of them. Henry
 19 Allen.

20 Q. Okay. Anyone else?

21 A. I just changed the board, so...
 22 Rayanne Weber.

23 Q. Okay. Anyone else?

24 A. I'm trying to find it while I'm --

25 Q. Are you a board member?

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1 A. I am.
2 Q. Are you chairman of the board?
3 A. I am.
4 Q. Okay. How often does the board meet?
5 A. Every quarter.
6 Q. And is the board responsible for all the
7 major decisions of FEC United?
8 A. Yes.
9 Q. Do you act -- do you make other decisions
10 for FEC United -- say, decisions that wouldn't rise to the
11 board level?
12 A. Say that again.
13 Q. Do you make other decisions for FEC United,
14 say, for example, decisions that wouldn't rise to the
15 level of a board decision?
16 A. No. No, I don't -- I will advise Stu. I
17 will advise them on what needs to be done, and they get
18 to make a decision on whether or not they follow that
19 path or not.
20 Q. Does FEC United have any employees?
21 A. It has one employee.
22 Q. And that's Stephanie Wheeler?
23 A. That is.
24 Q. And what's her job?
25 A. She's a communications -- she handles

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1 communications -- communications director.
2 Q. Okay.
3 A. We're an organization of volunteers. We
4 have volunteers, community leaders, and things like that
5 inside the community. It's a volunteer movement.
6 Q. Other than Ms. Wheeler, is anyone paid by
7 FEC United for their work with the organization?
8 A. We have a contractor that does web work.
9 But other than that, no.
10 Q. Have you ever been paid by FEC United?
11 A. No.
12 Q. How many members does FEC United have?
13 A. I don't know how many paid members we
14 have, but we have about 200,000 people across the nation
15 that have signed up to be members.
16 Q. Now, you said "paid members." What do you
17 mean by "paid member"?
18 A. Well, people can pay \$60 a year to become
19 a member of FEC United.
20 Q. And with that membership, what is -- what
21 does a paid member get?
22 A. They get access to newsletters and --
23 THE REPORTER: I'm sorry. News -- I'm
24 sorry. Newsletters and?
25 THE DEPONENT: Support.

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1 A. So if they call us in their business and
2 they need help, then we can mobilize people in the
3 community. If they have kids that go to school and they
4 talk about how critical race theory is being implemented
5 in their system, we can send parents their way.
6 So it's a complete mobilization model.
7 They can -- they can get access to those things without
8 being a paid member. It's just we want to support the
9 organization.
10 Q. (By Mr. Skarnulis) You mentioned a
11 newsletter, and Mr. Butler brought that up in his
12 testimony. Has FEC United's newsletter ever mentioned
13 Dr. Coomer or Dominion Voting Systems?
14 A. No, I don't believe so.
15 THE REPORTER: I'm sorry, sir, but you're
16 cutting out.
17 A. I don't recall that ever being done.
18 Q. (By Mr. Skarnulis) Who publishes the
19 newsletter?
20 A. It's an event where people in different
21 pillars contribute content. That content is then pushed
22 through by Stephanie -- scheduled to push through by
23 Stephanie.
24 Do you want to know who the other board
25 members are?

Page 16

1 Q. Sure.
2 A. Okay. So Kevin Jenkins.
3 Q. Okay.
4 A. Rayanne Weber, Henry Allen, and John
5 Tiegen.
6 Q. Okay. Thank you for that.
7 Does FEC United have an office?
8 A. No, not per se, no. We register in
9 Parker, Colorado, and people can work remotely or they
10 can use an office space at the -- at Greenwood Village.
11 Q. Okay. And that's -- that's -- Mr. Butler
12 mentioned that that's a shared office space with PIN
13 Business Network; is that right?
14 A. Yes.
15 THE REPORTER: I'm sorry, with? I'm
16 sorry, with what business network?
17 THE DEPONENT: PIN Business Network.
18 MR. SKARNULIS: P-I-N, Laurel.
19 Q. (By Mr. Skarnulis) Okay. Mr. Butler
20 mentioned that FEC authorized an informational
21 advertisement on Conservative Daily's podcast; is that
22 right?
23 A. I don't know what you're referring to. I
24 can't -- I don't know what his -- I reviewed his
25 testimony but, I mean, I didn't say that.

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1 Q. Okay.
2 A. But I can -- I can -- if you ask me more
3 questions as in, Is this true? I can answer those
4 things.
5 Q. Well, does FEC United advertise on
6 Conservative Daily?
7 A. It has, yes.
8 Q. Okay. Does it now?
9 A. From time to time I will talk about FEC
10 United, but we do have not have any formal agreement at
11 this time.
12 Q. Did FEC United have a formal agreement?
13 A. Yes, it did.
14 Q. From when to when?
15 A. I believe it was from August to November
16 or December.
17 Q. Okay.
18 A. Six months or four months.
19 Q. Was that a written contract?
20 A. Yes.
21 Q. And did FE --
22 THE REPORTER: I'm sorry.
23 Q. (By Mr. Skarnulis) Did FEC --let me try
24 that again.
25 Did FEC United pay for its informational

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1 advertisement on Conservative Daily podcast?
2 A. Yes.
3 Q. How much did FEC United pay for its
4 advertising?
5 A. I believe \$500.
6 Q. \$500 a spot?
7 A. No, just \$500.
8 Q. Okay.
9 A. So FEC did not actually -- they were
10 billed for it, but they did not pay for it. So let me
11 clarify. We had an agreement, but they didn't have the
12 money to pay it. So that money was written off from CD
13 Solutions to FEC United.
14 Q. Who made -- maybe you actually answered my
15 question. So there is a written contract between CD
16 Solutions and FEC United?
17 A. Yes.
18 Q. All right. Who made the decision for FEC
19 United not to pay CD Solutions for advertising?
20 A. Well, there was no money to pay it. So I
21 made the decision on behalf of CD Solutions to absolve
22 them of the debt.
23 Q. Do you know whether FEC United was
24 advertising on Conservative Daily at the time that you
25 first discussed Dr. Coomer? I believe that was

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1 November 9th.
2 A. I don't recall.
3 Q. Who was the president of FEC United at that
4 time in November of 2020?
5 A. Kristi Burton Brown.
6 Q. And when did Ms. Brown stop being
7 president?
8 A. I don't recall.
9 Q. Why was -- there was a period of time
10 Mr. Butler testified where FEC United did not have a
11 president; is that right?
12 A. Yes.
13 Q. Why did Ms. Brown step down as president?
14 A. She ran for Colorado GOP chair.
15 Q. And why did FEC United proceed without a
16 president for some period of time?
17 A. Because we didn't have a president for
18 that period of time.
19 Q. Were you ever president of FEC United?
20 A. When that organization started, yes.
21 Q. For how long?
22 A. A couple months.
23 Q. All right. We've seen some emails. Who
24 has an FEC United email address?
25 A. I don't know. 100 people probably.

Page 20

1 Q. How are -- how are those given out?
2 A. They're given out by Stephanie when people
3 bring people in as volunteers that head up other
4 volunteers.
5 Q. All right. She makes the decision on who
6 has an FEC United email address?
7 A. Stu makes the decision with Stephanie. So
8 Stu would ultimately make that decision.
9 Q. Is there a policy on the use of the FEC
10 United email addresses?
11 A. I'm sure there is. I'm not on that side
12 of how they can or can't use it.
13 Q. And the FEC United email addresses, would
14 they typically be used for FEC United business only?
15 A. Yes, typically.
16 Q. Okay.
17 A. I have an FEC United email address, and
18 that's basically the email address that I use. So I'm
19 grandfathered as a chairman of an FEC United email. I
20 use it.
21 Q. Do you have a personal email address that
22 you also use?
23 A. I have -- I've never really had a personal
24 email address. I just use email -- my email. But I have
25 a pro tem email, yes.

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<p>1 Q. And do you have a Conservative Daily email 2 address as well? 3 A. I do not. I have one, but it's 4 joeotto@conservativedaily -- conservative-daily.com. So 5 I rarely if ever -- it's a catchall for info at 6 conservative-daily.com. 7 Q. Okay. Mr. Cain asked you some questions 8 yesterday about how you, Joe Oltmann, came to be on the 9 antifa conference call. 10 And that was because of your work with FEC 11 United, right? 12 A. No. 13 Q. Okay. I'll show you an exhibit. It was 14 previously marked. Give me just a second here. Let me 15 share my screen with you. 16 Okay. Can you see that, Mr. Oltmann? 17 A. Yes. 18 Q. And do you recognize this Exhibit 28? 19 A. Yes. 20 Q. What is it? 21 A. It's the affidavit. 22 Q. Okay. If you go down to the third 23 paragraph, it says, Through this organization, FEC, I 24 became a target of journalists who began slamming both me 25 and my organization.</p> <p style="text-align: right;">Page 22</p>	<p>1 A. Yes. 2 Q. And were you able to search that? 3 A. I searched the entire database. 4 Q. And could not find anything about ? 5 A. No. 6 Q. Did -- to your knowledge, at the FEC United 7 meeting where first approached you, did any other FEC 8 members talk with him? 9 A. I don't recall. 10 Q. Do you know whether other FEC members know 11 ? 12 A. I have no idea. 13 Q. Do you know whether Mr. Butler is 14 acquainted with ? 15 A. Mr. Butler did not come in until early in 16 2021 or mid-2021. 17 Q. Has continued to be involved with FEC 18 United? 19 A. was never really involved in FEC 20 United. 21 Q. How many FEC United meetings did attend? 22 A. That I saw, only the ones that he 23 approached me on. 24 Q. If you'll look here -- 25 A. I'll answer this question because you</p> <p style="text-align: right;">Page 24</p>
<p>1 Do you see that? 2 A. Yes. 3 Q. And then it goes on to say that you were 4 able to attend the antifa meeting in the fourth paragraph, 5 right? 6 A. Yes. 7 Q. And that came as a result of somebody 8 approaching you at an FEC United meeting, right? 9 A. Yes. 10 Q. Okay. And that person was who you 11 testified about yesterday, right? 12 A. Yes. 13 Q. Mr. Cain asked you whether there were any 14 FEC meeting sign-in sheets, anything like that. Are 15 there? 16 A. There were at the time, yes. 17 Q. Were you able to look and see if you could 18 find out whether had signed in? 19 A. Yes. So the sheets themselves are not 20 kept. The email addresses are loaded into the email 21 system, and I did check to see if there was an email 22 address that would align with that person, and there 23 isn't one. 24 Q. What about the membership rolls? Is there 25 a membership roll for FEC?</p> <p style="text-align: right;">Page 23</p>	<p>1 asked me to find something, the agreement -- the 2 agreement for CD. 3 Q. Sure. 4 A. Yeah. All right. So I want to finish 5 writing it down. I didn't write it down. 6 Q. Okay. Going back to my screen share, 7 you'll see here -- Powell 209 is the page number. In this 8 paragraph where it says on Friday, November 6th, I 9 received a forwarded article about Georgia regular -- 10 irregularities on the election day. I normally do not 11 read many of the these articles because I'm inundated with 12 information both from FEC and my company. 13 Do you see that? 14 A. Yes. 15 Q. Was this article that you referred to here 16 sent to you by another member of FEC? 17 A. I don't recall, actually. 18 Q. Since you brought up the advertising 19 contract, after the Eric Coomer story came out on 20 November 9th, did FEC United have subsequent informational 21 advertising on Conservative Daily? 22 A. Say that again. 23 Q. After you first told the story about 24 Dr. Coomer on November 9th -- 25 A. It's not a story. It's not a story. It's</p> <p style="text-align: right;">Page 25</p>

1 what happened. So it's not a story. It's exactly what
2 happened.

3 So after I told exactly what happened over
4 those months, continue.

5 Q. Did FEC United have subsequent
6 informational advertising on Conservative Daily?

7 A. I talk about FEC United still to this day
8 when I'm on the podcast.

9 Q. Did FEC United have subsequent advertising
10 on Conservative Daily?

11 A. Meaning -- meaning did we have a contract
12 where we were paid for it?

13 Q. Yes.

14 A. No. There's no budget for FEC United for
15 advertising.

16 Q. I'm trying to figure out when it
17 was -- there was a period of time from whenever to
18 whenever when there was this contract, right?

19 A. Right.

20 Q. When was the contract terminated?

21 A. When they couldn't pay the contract to
22 begin with.

23 Q. And when was that?

24 A. I don't -- I don't recall.

25 Q. Was it after November 6th?

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1 A. I don't recall. I think it went through
2 December.

3 Q. Okay. Did anyone with FEC United ever
4 voice concerns about representations made on the
5 Conservative Daily podcast about Dr. Coomer?

6 A. Advertisers are not responsible for the
7 content of a podcast.

8 Q. Okay. That's not my question.
9 Did anyone from FEC United voice concerns
10 about the content on Conservative Daily?

11 A. I don't recall.

12 Q. Okay. I'm going to share the screen. I'm
13 going to share my screen with you again.

14 Okay. Can you see that?

15 A. Yes.

16 Q. This is marked as Exhibit 103. It's FEC
17 emails, JODisclosures.

18 Do you recognize this first page?

19 A. If we disclosed it, then yes.

20 Q. All right. And it's an email from your FEC
21 United email address, right?

22 A. Yes.

23 Q. And it is to chanel.rion@oann, right?

24 A. Yes.

25 Q. Okay. Had OANN reached out to you prior to

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1 you contacting Ms. Rion?

2 A. I don't recall.

3 Sorry. I'm not looking at you because
4 there's another screen. So it's not --

5 Q. I understand. That's fine. I mean, I'm
6 doing the same.

7 So obviously we can watch the video, but
8 you appeared on a report that Ms. Rion did, right?

9 A. Yes.

10 Q. And FEC United was mentioned in that
11 report, wasn't -- wasn't it?

12 A. Yes, I think so. I'm not -- I'm not
13 familiar with it, actually.

14 Q. Okay. Did FEC United see an increase in
15 membership after this story came out in mid-November?

16 A. No.

17 Q. Okay. If you were to draw a graph, was the
18 rate of membership consistent throughout?

19 A. No. The -- as the organization became
20 more mature, you obviously get more memberships. But
21 there was no spike like you saw in the election. You
22 know, like when all the fake votes were put in for the
23 election across the country? There's nothing like that
24 that would show a big steep -- if you look at the
25 progression of it, it's been a steady flow for the last

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1 10 months, unlike the, you know, stuff dealing with, you
2 know, Dominion Voting Systems across the country.

3 Q. Well, you were wanting to grow the
4 membership of FEC United in November of 2020, right?

5 A. I was wanting to grow the membership in
6 FEC United all the way back to when -- the inception of
7 the organization. I mean, any person out there that
8 wants to protect the community and do things to protect
9 the people in the community would want that membership
10 and to grow.

11 Q. And you also wanted to grow the membership
12 in November of 2020, right?

13 A. I wanted to grow the membership since the
14 inception of the organization, and I continue to this day
15 to want to grow the membership of this organization.
16 We've had immense growth across multiple states as a
17 result of this over the last 12 months or so.

18 Q. Well, and through this -- the allegations
19 about Dr. Coomer, FEC United received a lot of publicity,
20 right?

21 A. No. No. No.

22 Q. Okay.

23 A. I mean, you can describe a lot of
24 publicity, but I would not describe what FEC has as a lot
25 of publicity.

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1 Q. Okay. I'll share my screen with you.
2 You're familiar with Michelle Malkin,
3 right?
4 A. I am.
5 Q. Who is she?
6 A. She's a newsperson.
7 Q. All right. She was with Newsmax and also
8 had her own Michelle Malkin Live Show, right?
9 A. I believe so.
10 MR. QUEENAN: Object to form.
11 THE REPORTER: I'm sorry. Who objected?
12 Just a moment. Who objected?
13 MR. QUEENAN: Gordon Queenan on behalf of
14 Michelle Malkin. And I just objected to form.
15 Q. (By Mr. Skarnulis) Okay.
16 A. Because they asked me what I do for a
17 living.
18 Q. Let's take a look at this.
19 (Video playing.)
20 Q. Now, Ms. Malkin gave publicity to FEC
21 United, right?
22 A. Yes.
23 Q. And was that one of the goals that FEC
24 United had on you appearing on Ms. Malkin's show?
25 A. No. They asked me what I do for a living,

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1 so I answered that I work with FEC United.
2 Q. Let me fast-forward a little bit here.
3 (Video playing.)
4 Q. Now, Ms. Malkin devoted a significant
5 portion of the end of her show to FEC United.
6 Do you recall that?
7 A. I don't, but I -- I appreciate it, for
8 sure.
9 Q. And this is good publicity if FEC United is
10 trying to increase its membership, right?
11 A. Yes.
12 Q. And you appeared on a number of other shows
13 that garnered publicity for FEC United; is that right?
14 A. Yes.
15 Q. For example, you own the Eric Metaxas show,
16 and Mr. Metaxas devoted some time to discussing FEC United
17 with you, right?
18 MR. KIMREY: I object to this entire
19 line of scoping. It's beyond the scope of limited
20 anti-SLAP discovery. It's completely irrelevant. Form.
21 THE REPORTER: Who objected? I don't see
22 names. I need identification.
23 MR. KIMREY: This is Blaine Kimrey.
24 THE DEPONENT: This is dumb. This is --
25 Q. (By Mr. Skarnulis) Okay. You can answer.

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1 A. What was the question again?
2 Q. You were on Eric Metaxas, it's a nationwide
3 syndicated show.
4 A. This -- this deposition is about FEC
5 United. This deposition is not on Joe Oltmann. So if
6 you want to ask me questions about FEC United, I will
7 answer those questions. If you want to ask me questions
8 about my role in the organization, I will answer those
9 questions.
10 If you want to go down a rabbit hole where
11 you try to interrogate me for another two hours like you
12 did yesterday, we're not going to get anywhere. Because
13 I'm not going to go through this process where you get a
14 second bite, third bite, fifth, twelfth bite at the
15 apple. I'm not going to do it.
16 I could have put my company -- I could
17 have put my company on there of which I got docs there,
18 had to step down as the CEO, walk away and divest. Or I
19 could put FEC United, which is actually on the ground
20 fighting for people in this country.
21 And I know people like you and Eric Coomer
22 and everyone else can't appreciate that, but that's what
23 I was doing. And that's what I wanted people to
24 understand is that I was in the fight and had been in the
25 fight, and that's why I got into the conversation to

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1 begin with, not because of the work that I did with PIN,
2 but because of the fact that I was out there fighting for
3 people.
4 That's the only reason I got an
5 opportunity to get involved in this thing to begin with.
6 It had nothing to do with FEC. It had to do with me
7 going out there and fighting. FEC is an organization
8 that did great things in the community. FEC United
9 continues to do great things in the community, but
10 getting publicity or not getting publicity makes no
11 difference to me. They asked me what organization I
12 represented, I told them, period.
13 MR. SKARNULIS: Objection. Nonresponsive.
14 A. Oh, my gosh. All right.
15 Q. (By Mr. Skarnulis) FEC United was
16 discussed with Eric Metaxas on his nationwide syndicated
17 show, right?
18 A. Yes. I -- probably, yes.
19 Q. Okay. FEC United has been discussed on
20 other shows such as Steve Bannon's podcast, right?
21 A. I don't know that. I don't recall.
22 Q. FEC United has garnered publicity at events
23 like Mike Lindell's cyber symposium, right?
24 THE REPORTER: I'm sorry. I didn't hear
25 the objection.

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1 MR. KIMREY: Objection. Beyond the scope.
2 Blaine Kimrey, OANN, Chanel Rion.
3 Q. (By Mr. Skarnulis) Prior to the
4 allegations that Joe Oltmann made about Dr. Coomer, FEC
5 United was not getting publicity, such as Ms. Malkin's
6 show and Mr. Metaxas's show, right?
7 A. That is not true.
8 Q. Okay. What other publicity had FEC United
9 been receiving?
10 A. Lots of publicity.
11 MR. KIMREY: Objection to beyond the
12 scope. Blaine Kimrey.
13 Q. (By Mr. Skarnulis) Can you give me an
14 example?
15 A. Well, I can tell you that every FEC United
16 meeting we had across the state, more than 300 people
17 would show up to each one and as many as 1200 people
18 showed up to an FEC meeting. So I would say that FEC
19 United was doing just fine long before November.
20 I would say that actually coming out and
21 telling the truth about your client caused FEC United to
22 retract, not to grow.
23 Q. Are you able to demonstrate that? I
24 thought you said the membership has increased.
25 A. The membership has increased.

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1 Q. Okay. How has it retracted then?
2 A. Well, it slow -- it slows down and then
3 speeds up. How's that?
4 Q. Okay.
5 A. As we start -- as we start to do
6 more -- as FEC United starts to do more, to help people
7 in the community, it starts to go back up again. All
8 right?
9 But you have a certain pause that happens
10 when people are kind of in that place where they couldn't
11 believe what their eyes were showing them as a result of
12 the 2020 election that was stolen from them.
13 THE REPORTER: I'm sorry. There was a
14 cutting out. Can you repeat the last phrase,
15 Mr. Oltmann?
16 A. That was stolen from the American people.
17 The election that was stolen from the American people.
18 Q. (By Mr. Skarnulis) I'm going to share my
19 screen with you again.
20 Are you able to see that?
21 A. I see it.
22 (Video playing.)
23 Q. Prior to the allegations about Dr. Coomer,
24 had FEC United ever appeared on an OANN segment?
25 MR. KIMREY: Objection. Beyond the scope.

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1 Q. (By Mr. Skarnulis) You can answer.
2 MR. KIMREY: Same objection.
3 Q. (By Mr. Skarnulis) Was that a no? I'm
4 sorry.
5 THE REPORTER: I can't hear you,
6 Mr. Oltmann.
7 THE DEPONENT: Say that again?
8 THE REPORTER: I said I can't hear you,
9 Mr. Oltmann.
10 A. I didn't hear the question.
11 Q. (By Mr. Skarnulis) Prior to the
12 allegations that you made about Dr. Coomer, had FEC United
13 ever appeared on an OANN segment?
14 MR. KIMREY: Objection. Beyond the scope.
15 A. Do I answer it?
16 Q. (By Mr. Skarnulis) Yes, you can answer.
17 A. No.
18 Q. Prior to the allegations you made about
19 Dr. Coomer, had FEC United ever been featured on Eric
20 Metaxas's show?
21 A. FEC United was never featured on any of
22 these shows.
23 Q. Okay. Had FEC United, to your knowledge,
24 ever been mentioned on Mr. Metaxas's show?
25 A. I don't recall. I haven't seen it in

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1 months.
2 Q. Prior to your allegations against
3 Dr. Coomer, had FEC United ever been mentioned on Newsmax,
4 to your knowledge?
5 A. I don't -- I don't -- I don't know. We've
6 been mentioned all over the country prior to November
7 election.
8 Q. Has FEC United had any meetings or rallies
9 related to allegations of election fraud?
10 A. I don't recall.
11 Q. Prior to the election, had FEC United had a
12 meeting or a rally regarding the possibility of election
13 fraud?
14 A. I don't think so.
15 Q. Prior to the election, had FEC United ever
16 mentioned or discussed election fraud in its newsletter?
17 MR. KIMREY: Mr. Skarnulis, let's -- can I
18 just have a standing -- this is Blaine Kimrey, I don't
19 want to keep objecting beyond the scope. I think almost
20 this entire deposition has been beyond the scope of
21 limited anti-SLAP discovery.
22 Can I just have a standing objection so I
23 don't have to keep objecting as to beyond the scope as to
24 all your questions? Do you consent to that?
25 MR. SKARNULIS: Sure. I think I'm keeping

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1 squarely within the scope, but we can agree to disagree.
 2 MR. KIMREY: Okay. So I have a standing
 3 objection.
 4 MR. SKARNULIS: Yes, you do.
 5 MR. KIMREY: Beyond the scope?
 6 MR. SKARNULIS: Right.
 7 Q. (By Mr. Skarnulis) Mr. Oltmann, we've been
 8 going about half an hour, let's take a break. Hopefully
 9 these entity depositions will not be as lengthy as even
 10 the two hours that we're allotted, but this will allow us
 11 to take a break and for me to get organized.
 12 A. Okay.
 13 THE REPORTER: Off the record?
 14 THE DEPONENT: How long are we going to
 15 break?
 16 THE REPORTER: Just a moment. Let's go
 17 off the record.
 18 THE VIDEOGRAPHER: Off the record at 11:00
 19 a.m. [sic].
 20 (Recess from 10:00 a.m. to 10:13 a.m.)
 21 THE VIDEOGRAPHER: One second. Back on
 22 the record. The time is 11:13 a.m.
 23 Q. (By Mr. Skarnulis) Mr. Oltmann, has anyone
 24 associated with FEC United performed any independent
 25 investigation about the allegations you've made regarding
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1 Dr. Coomer?
 2 A. No.
 3 Q. Why not?
 4 A. I don't even know how to answer that
 5 question.
 6 Q. Has anyone at FEC United attempted to
 7 identify who got you on the antifa Zoom?
 8 A. No.
 9 Q. Has anyone with FEC United attempted to
 10 find evidence that Dr. Coomer was involved in any
 11 organizations you would contend are affiliated with
 12 antifa?
 13 A. No. It's not their job.
 14 Q. You've said before that FEC United has
 15 uncovered antifa journalists; is that right?
 16 A. I don't believe that's how I put it, but
 17 we did uncover FEC -- excuse me -- we did uncover antifa
 18 journalists.
 19 Q. What pillar of the FEC is investigating
 20 antifa under?
 21 A. What?
 22 Q. Well, FEC's mission involves the three
 23 pillars you discussed at the beginning of our deposition,
 24 right?
 25 A. Yes.
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1 Q. Where does investigating connections to
 2 antifa fall under that?
 3 A. Antifa -- FEC as an organization did not
 4 look into this. Individuals collectively looked into
 5 this.
 6 Q. What is FEC United's connection with UADF?
 7 A. They are -- they partner at events.
 8 Q. Are members of FEC United also members of
 9 UADF?
 10 A. Some of them are, I'm sure.
 11 Q. What is UADF?
 12 A. United American Defense Force.
 13 Q. And are you involved with United American
 14 Defense Force?
 15 A. I'm a member.
 16 Q. Are you a founder?
 17 A. I'm not.
 18 Q. All right. Yesterday -- let me make sure
 19 I've got this right -- Mr. Arrington questioned you at the
 20 end of yesterday's deposition, and you testified that you
 21 had never communicated with Sidney Powell directly.
 22 Has FEC United or anyone involved
 23 communicated with Sidney Powell directly?
 24 A. Not to my knowledge, no.
 25 MS. DEFRANCO: Mr. Skarnulis, can I ask
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1 you to clarify, please, what you mean by "Sidney Powell"?
 2 MR. SKARNULIS: Sure. I'll share my
 3 screen. That should help.
 4 Q. (By Mr. Skarnulis) Okay. Can you see
 5 that, Mr. Oltmann?
 6 A. Yes.
 7 Q. And this is -- for the record, it's
 8 Exhibit 103 at page 864. Do you recognize this?
 9 A. Yes.
 10 Q. What is it?
 11 A. It's an email from me to Sidney.
 12 Q. And it's dated January 22nd, 2021, right?
 13 A. Yes.
 14 Q. And this is on your FEC United account,
 15 right?
 16 A. Yes.
 17 Q. Lyn Duden is cc'd at PINbn.com. Who is Lyn
 18 Duden?
 19 A. She is my assistant, and the thing
 20 automatically cc'd on several emails.
 21 Q. Does Lyn Duden have any association with
 22 FEC United?
 23 A. She does not.
 24 Q. Does Lyn Duden assist with any of FEC
 25 United's business?
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1 A. She does not.
 2 Q. You write here, Sidney, it might be a good
 3 idea to connect. We have some interesting information on
 4 Eric Coomer.
 5 What interesting information did you have
 6 on Dr. Coomer in January of 2021?
 7 A. I had an entire dossier of information on
 8 Eric Coomer.
 9 Q. When you say a "dossier," what was
 10 contained in that?
 11 A. It's inside the discovery.
 12 Q. Okay.
 13 A. The information, such as being a skinhead,
 14 being a drug addict, self-proclaimed liar,
 15 self-proclaimed -- having bipolar disorder. I can go
 16 down the list if you want and you can go through it.
 17 Q. No. That's all right.
 18 Did you share that information with
 19 Ms. Powell?
 20 A. I don't recall.
 21 Q. You also write, You also need to be aware
 22 of what we're doing in Colorado in gaining access to the
 23 Dominion systems under the radar. We have several county
 24 clerks cooperating.
 25 Do you see that?

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1 A. Yes.
 2 Q. Did you assist in providing Ms. Powell
 3 access to Dominion systems?
 4 A. This deposition is not about Dominion.
 5 This deposition is about FEC United.
 6 Q. Well, this is on an FEC United email.
 7 A. Okay. But that -- this -- this deposition
 8 is about FEC United's involvement, which it had none.
 9 I've already testified that I use FEC United email as my
 10 personal email address.
 11 Q. How does our judge or a member of our jury
 12 in viewing a document such as this, how do they tell when
 13 Joe Oltmann has on his FEC hat or it's just Joe Oltmann
 14 individually?
 15 A. This is just an email address.
 16 Q. Okay. And this email, you're telling the
 17 jury is on behalf of you individually, right?
 18 A. Yes.
 19 Q. Not one of the three entities we're going
 20 to do depositions on today?
 21 A. Meaning what? Meaning what?
 22 Q. You're not acting in your capacity as a
 23 representative of FEC, Shuffling Madness, or Conservative
 24 Daily?
 25 A. Why would I act on behalf of that when I'm

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1 looking at all of the information related to the lawsuit?
 2 Q. I'm asking you as a representative of FEC
 3 United. You're using your FEC United email to communicate
 4 directly with Ms. Powell, aren't you?
 5 A. Yes.
 6 Q. Why did you not use another email address?
 7 A. I don't know. I used several email
 8 addresses.
 9 Q. And I'm going to ask the question again
 10 because I don't think you've answered it.
 11 How is it that a member of our jury can
 12 tell when you've got your FEC United hat on or when you're
 13 just Joe Oltmann?
 14 A. I'm the chairman of the board for FEC
 15 United. I'm a volunteer for FEC United. The information
 16 in this email and subsequent emails has to do with the
 17 lawsuit that was filed, and the information that we had
 18 on Eric Coomer and his credibility as a human being comes
 19 into play with Sidney Powell and others. So I'm
 20 obviously doing this as a result of the information I was
 21 able to uncover about Eric Coomer.
 22 MR. KIMREY: I'd like to -- I'd like to
 23 interpose an objection. I think it's ironic,
 24 Mr. Skarnulis, that you're referring to a jury when we're
 25 involved in anti-SLAP discovery, which has nothing to do

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1 with a jury. So I just reiterate, beyond the scope.
 2 MR. SKARNULIS: Okay. That's fair.
 3 Q. (By Mr. Skarnulis) How does our judge tell
 4 whether this is an FEC United email or a Joe Oltmann
 5 email?
 6 A. Well, the judge has already made up her
 7 mind of what she's doing. I wouldn't be surprised if
 8 she's communicating with you guys directly.
 9 Q. Okay. What is it about this email that
 10 indicates to the ordinary reader that this is Joe Oltmann
 11 personally and not Joe Oltmann on behalf of FEC United?
 12 A. I can't speculate on what a reader would
 13 actually think.
 14 Q. And you can't speculate on what Ms. Powell
 15 thought, right?
 16 A. Well, I'm not Ms. Powell, so that would be
 17 accurate. I can't speculate on what she would think.
 18 Q. In this email thread, if you'll go down to
 19 the next page, 865, you say in a subsequent email that you
 20 can give Ms. Powell access to 103 gigabytes of data, as
 21 well as the updated Antrim County report.
 22 Does FEC United have data from Antrim
 23 County in Michigan?
 24 A. No.
 25 Q. Did you provide Ms. Powell 103 gigs of data

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1 from Antrim County?
2 A. I don't recall.
3 Q. Scrolling down a second.
4 There is a -- there's an email here, I'm
5 not sure who that's from but signed W. I would assume
6 that's Wilson Powell. Yeah.
7 And Mr. Powell gave you a phone number
8 here. Did Mr. Powell and you speak?
9 A. I don't recall.
10 Q. Is Sidney Powell or any of the other
11 defendants, are they involved at all with FEC United?
12 A. No.
13 Q. Has FEC United performed any investigation
14 of the Dominion Voting Systems machines?
15 A. FEC United has never gotten involved in
16 the election fraud that was perpetrated on the American
17 people on the 3rd of November.
18 MS. DEFRANCO: I'm going to object that
19 Dominion Voting Systems is not a party in this case other
20 than as it relates directly to Eric Coomer. And that is
21 the --
22 THE REPORTER: I'm sorry, Ms. DeFranco. I
23 didn't hear the last statement. And that is the?
24 MS. DEFRANCO: I beg your pardon.
25 And that is the order on the scope of

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1 discovery.
2 THE DEPONENT: I apologize for drinking
3 lots of water, but I'm taking this creatine stuff that
4 requires you to drink lots of water when you work out.
5 Got to stay healthy.
6 MR. SKARNULIS: Let's go off the record
7 for just a couple minutes. I may be done with this one.
8 THE VIDEOGRAPHER: Okay. Off the record.
9 11:27 a.m.
10 (Recess from 10:27 a.m. to 10:35 a.m.)
11 THE VIDEOGRAPHER: Back on the record.
12 The time is 11:35 a.m.
13 Q. (By Mr. Skarnulis) Mr. Oltmann, does FEC
14 United scan the driver's licenses of attendees at its
15 meetings?
16 A. They do now, yes.
17 Q. Did they, at the time of the Bandimere
18 meeting where approached you?
19 A. didn't approach me at the Bandimere
20 meeting. The Bandimere meeting happened on October 15th.
21 October 15th --
22 Q. Sorry. I didn't --
23 A. I'm sorry?
24 Q. Sorry. I may have gotten that wrong.
25 Did FEC United scan the driver's licenses

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1 of attendees at the meeting where approached you?
2 A. I don't -- I don't think so, no.
3 Q. Okay. was present at the Bandimere
4 meeting, wasn't he?
5 A. I don't believe so. He may have been.
6 Q. Okay. Does FEC United retain the records
7 of the driver's licenses that are scanned?
8 A. No.
9 MR. SKARNULIS: All right. I pass the
10 witness.
11 THE DEPONENT: Let -- let me clarify if we
12 keep records, because I'll have to check with -- with
13 them to see if they keep any of those records.
14 MR. SKARNULIS: Thank you for that.
15 MS. DEFRANCO: Back then?
16 THE DEPONENT: No, at all. He asked me
17 the question at all. He didn't clarify the time.
18 THE REPORTER: I'm sorry. Ms. DeFranco, I
19 can't hear you.
20 MS. DEFRANCO: I was just trying to
21 clarify what my client is going to check, and he's going
22 to check to see if -- if FEC was keeping driver's
23 licenses at the time of Mr. Oltmann's meeting with or
24 at the time of the Bandimere meeting. He's not going to
25 look past that.

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1 THE REPORTER: Counsel, any other
2 questions?
3 I didn't hear a response.
4 THE DEPONENT: I apologize. Can you
5 please --
6 MS. DEFRANCO: I have nothing further.
7 Thank you.
8 THE REPORTER: All right. Counsel,
9 starting with Mr. Skarnulis, your order, please?
10 MR. SKARNULIS: The same. Etran.
11 THE REPORTER: Any other counsel ordering?
12 MR. KIMREY: This is Blaine Kimrey, and
13 actually I think I'd just like this on a regular delivery
14 cycle. So I don't need it -- well, I actually -- I would
15 like the video. How quickly can I get the video? What's
16 a regular delivery on the video?
17 THE VIDEOGRAPHER: If you put in like an
18 expedited order, Veritext -- I don't know. I usually
19 just do -- I don't know how long, but they'd probably
20 give it to you by the end of the week.
21 MR. KIMREY: Yeah. I just -- I'd just
22 like a regular delivery cycle, I think.
23 MS. DOMINGUEZ: Mr. Kimrey?
24 MR. KIMREY: Yes.
25 MS. DOMINGUEZ: The standard delivery is

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1 10 business days. If you want it expedited, we can
 2 expedite it. If you want to sync the transcript, that
 3 normally takes about 10 business days unless you want
 4 that expedited as well.
 5 MR. KIMREY: Let's do the sync on the
 6 video on a regular delivery. And then as far as the
 7 transcript is concerned, we'll just take that on a
 8 regular delivery as well.
 9 THE REPORTER: Any other counsel ordering?
 10 MR. HOLWAY: This is Eric Holway on behalf
 11 of the Trump campaign. And I'd just like an E-Transcript
 12 for regular delivery, please. Thank you.
 13 THE REPORTER: Any other --
 14 MS. BOEHMER: This is Margaret Boehmer on
 15 behalf of Eric Metaxas. We'd like an E-Transcript,
 16 regular delivery. No video, please. Thank you.
 17 THE DEPONENT: Blaine just wants to see me
 18 up-front and personal.
 19 MR. KIMREY: I think I'm getting plenty of
 20 that, Joe, so...
 21 MS. DEFRANCO: We need to arrange for
 22 reading and signing, and then take just our standard
 23 electronic, please.
 24 THE REPORTER: Okay. Thank you.
 25 THE VIDEOGRAPHER: Okay. Really quick.
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1 Anyone else for the video?
 2 All right. If that's everyone, this
 3 concludes the deposition of Joe Oltmann. Off the record
 4 at 11:40 a.m.
 5 MR. KIMREY: If this is on the record
 6 right now, I wouldn't call it the deposition of Joe
 7 Oltmann. It was the deposition --
 8 THE VIDEOGRAPHER: Sorry.
 9 MR. KIMREY: -- of the authorized
 10 representative of FEC United.
 11 THE VIDEOGRAPHER: So this concludes the
 12 deposition of corporate rep for FEC United. Off the
 13 record. 11:41 a.m.
 14 * * * * *
 15 WHEREUPON, the foregoing deposition was
 16 concluded at the hour of 10:41 a.m. Total time on the
 17 record was 1 hour and 46 minutes.
 18
 19
 20
 21
 22
 23
 24
 25
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1 I, JOE OLTMANN, the deponent in the above
 2 deposition, do hereby acknowledge that I have read the
 3 foregoing transcript of my testimony and state under oath
 4 that it, together with any attached Amendment to
 5 Deposition pages, constitutes my sworn testimony.
 6
 7 _____ I have made changes to my deposition
 8 _____ I have NOT made any changes to my deposition
 9
 10
 11 _____
 12 JOE OLTMANN
 13 Subscribed and sworn to before me this _____
 14 day of _____, 20____.
 15
 16 My commission expires: _____
 17
 18 _____
 19 Notary Public
 20
 21 _____
 22 Address
 23
 24
 25
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1 REPORTER'S CERTIFICATE
 2
 3
 4 I, Laurel S. Tubbs, a Registered
 5 Professional Reporter and Notary Public within the State
 6 of Colorado, do hereby certify that previous to the
 7 commencement of the examination, the deponent was duly
 8 sworn by me to testify to the truth.
 9 I further certify that this deposition was
 10 taken in shorthand by me remotely and thereafter reduced
 11 to a typewritten form; that the foregoing constitutes a
 12 true and correct transcript.
 13 I further certify that I am not related
 14 to, employed by, nor of counsel for any of the parties or
 15 attorneys herein, nor otherwise interested in the result
 16 of the within action.
 17 My commission expires September 1, 2023.
 18
 19 
 LAUREL S. TUBBS
 20 Registered Professional Reporter,
 21 Certified Realtime Reporter,
 22 and Notary Public
 23 Dated: September 10, 2021
 24
 25
 Page 53

1 Ms. Andrea Hall, Esq.
 2 andrea@thehalllawoffice.com
 3 September 10, 2021
 4 RE: Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.
 5 9/9/2021, FEC United - Joe Oltmann (#4792308)
 6 The above-referenced transcript is available for
 7 review.
 8 Within the applicable timeframe, the witness should
 9 read the testimony to verify its accuracy. If there are
 10 any changes, the witness should note those with the
 11 reason, on the attached Errata Sheet.
 12 The witness should sign the Acknowledgment of
 13 Deponent and Errata and return to the deposing attorney.
 14 Copies should be sent to all counsel, and to Veritext at
 15 errata-tx@veritext.com.
 16
 17 Return completed errata within 30 days from
 18 receipt of testimony.
 19 If the witness fails to do so within the time
 20 allotted, the transcript may be used as if signed.
 21
 22 Yours,
 23 Veritext Legal Solutions
 24
 25

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1 Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.
 2 FEC United - Joe Oltmann (#4792308)
 3 ACKNOWLEDGEMENT OF DEPONENT
 4 I, FEC United - Joe Oltmann, do hereby declare that I
 5 have read the foregoing transcript, I have made any
 6 corrections, additions, or changes I deemed necessary as
 7 noted above to be appended hereto, and that the same is
 8 a true, correct and complete transcript of the testimony
 9 given by me.
 10
 11 _____
 12 FEC United - Joe Oltmann Date
 13 *If notary is required
 14 SUBSCRIBED AND SWORN TO BEFORE ME THIS
 15 _____ DAY OF _____, 20____.
 16
 17 _____
 18
 19 NOTARY PUBLIC
 20
 21
 22
 23
 24
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1 Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.
 2 FEC United - Joe Oltmann (#4792308)
 3 E R R A T A S H E E T
 4 PAGE____ LINE____ CHANGE_____
 5 _____
 6 REASON_____
 7 PAGE____ LINE____ CHANGE_____
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 24 FEC United - Joe Oltmann Date
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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.

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE STATE RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.

<p>DISTRICT COURT, DENVER COUNTY, COLORADO 1437 Bannock Street Denver, CO 80202</p>	<p>SERVED ONLY: September 2, 2021 1:46 PM FILING ID: ECCB7253DF7F7 CASE NUMBER: 2020CV34319</p>
<p>ERIC COOMER, Ph.D., Plaintiff</p> <p>vs.</p> <p>DONALD J. TRUMP FOR PRESIDENT, INC., et al., Defendants</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>Attorneys for Plaintiff Charles J. Cain, No. 51020 <u>ccain@cstrial.com</u> Steve Skarnulis, No. 21PHV6401 <u>skarnulis@cstrial.com</u> Bradley A. Kloewer, No. 50565 <u>bkloewer@cstrial.com</u> Zachary H. Bowman, No. 21PHV6676 <u>zbowman@cstrial.com</u> CAIN & SKARNULIS PLLC P. O. Box 1064 Salida, Colorado 81201 719-530-3011/512-477-5011 (Fax)</p> <p>Thomas M. Rogers III, No. 28809 <u>trey@rklawpc.com</u> Mark Grueskin, No. 14621 <u>mark@rklawpc.com</u> Andrew E. Ho, No. 40381 <u>andrew@rklawpc.com</u> RECHTKORNFELD PC 1600 Stout Street, Suite 1400 Denver, Colorado 80202 303-573-1900</p>	<p>Case Number: 2020cv034319</p> <p>Division Courtroom: 409</p>
<p style="text-align: center;">PLAINTIFF'S FIRST AMENDED NOTICE OF INTENTION TO TAKE ORAL AND VIDEOTAPED DEPOSITION OF THE AUTHORIZED REPRESENTATIVE OF DEFENDANT FEC UNITED</p>	



PLEASE TAKE NOTICE that counsel for Eric Coomer will take the oral and video deposition of **FEC United beginning at 9:00 a.m. (mdt) on September 9, 2021**, pursuant to C.R.C.P. 30(b)(6), as well as the Court's June 8, 2021 and August 29, 2021 Orders.

The witness and all other persons will appear remotely utilizing the secure web-based deposition option afforded by Veritext Legal Solutions, or in the alternative, video conferencing (VTC) services offered by Veritext Legal Solutions to provide remote access for those parties wishing to participate in the depositions via the internet and/or telephone. Further, in accordance with the Court's August 29, 2021 Order, the witness will both from the chest up, and the room as a whole—to as closely as possible replicate an in-person deposition.

The foregoing depositions will be conducted before the following duly authorized court reporter: Veritext Legal Solutions. In addition, notice is provided that the court reporter also may be remote via one of the options above for the purposes of reporting the proceeding and may or may not be in the presence of the deponents.

Access information for the depositions will be provided prior to the date and time scheduled for the deposition. In addition, Plaintiff reserves the right to utilize instant visual display technology such that the court reporter's writing of the proceeding will be displayed simultaneous to their writing of same on a laptop, iPad, tablet, or other type of display device connected to the court reporter.

You are further advised that this deposition may be videotaped in accordance with C.R.C.P. 30.

The deposition will be recorded by stenographic means. The deposition will be before an officer appointed or designated pursuant to C.R.C.P. 28 and will continue from day-to-day until completed. You are further advised that this deposition will be videotaped in accordance with C.R.C.P. 30.

FEC United is directed to designate person(s) to testify on its behalf on the matters described in **Exhibit A** attached hereto.

You are further advised that the deposition may be videotaped in accordance with C.R.C.P. 30.

Respectfully submitted this 2nd day of September 2021.

/s/ Steve Skarnulis
Steve Skarnulis, No. 21PHV6401

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Deposition Notice has been served on all parties receiving notice through ICCES on this 2nd day of September 2021.

/s/ Steve Skarnulis
Steve Skarnulis, No. 21PHV6401

EXHIBIT A

I. DEFINITIONS

1. “Dr. Coomer” refers to Eric Coomer, Plaintiff herein.
2. “You,” “your,” or “yourself” refers to FEC United, as well as any affiliated entities, subsidiaries, or parent companies and/or any and all current or former officers, directors, agents, servants, employees, predecessors, successors, assigns, sureties, attorneys, affiliates, or representatives acting for or on its behalf.
3. “Defendants” collectively refers to Defending the Republic; Donald J. Trump for President, Inc.; FEC United; Rudolph Giuliani; Herring Networks, Inc. dba One America News Network; James Hoft; Michelle Malkin; Eric Metaxas; Joseph Oltmann; Sidney Powell; Sidney Powell, P.C.; Chanel Rion; Shuffling Madness Media, Inc. dba Conservative Daily; and TGP Communications LLC dba The Gateway Pundit, as well as any affiliated entities, subsidiaries, or parent companies and/or any and all current or former officers, directors, agents, servants, employees, predecessors, successors, assigns, sureties, attorneys, affiliates, or representatives acting for or on their behalf. Individual reference to one Defendant named in this lawsuit refers specifically to that Defendant, as well as any affiliated entities, subsidiaries, or parent companies and/or any and all current or former officers, directors, agents, servants, employees, predecessors, successors, assigns, sureties, attorneys, affiliates, or representatives acting for or on their behalf.

II. MATTERS UPON WHICH EXAMINATION IS REQUESTED

1. All statements, broadcasts and publications made, authorized, or ratified by you containing any statements regarding Dr. Coomer or Dominion Voting Systems.¹
2. All broadcasts and publications made on your behalf, if any, by Joseph Oltmann regarding Dr. Coomer or Dominion Voting Systems.
3. Joseph Oltmann’s role, if any, as your representative or agent, including any authorization of Joseph Oltmann to make statements on your behalf or ratification of statements made by Joseph Oltmann regarding Dr. Coomer or Dominion Voting Systems.
4. Your structure, ownership or control and relationship to Joseph Oltmann, Shuffling Madness Media, Inc. and/or CD Solutions, Inc; or any other entity or affiliate you contend has an interest in the ownership or control of Conservative Daily.

¹ All references to Dominion Voting Systems are limited to and defined by the Court’s Discovery Order.

5. Any knowledge of Dr. Coomer or Dominion Voting Systems prior to your publication, authorization, or ratification of statements regarding Dr. Coomer and Dominion Voting Systems, including: what this knowledge was; when this knowledge was acquired; how this knowledge was acquired; and the basis of this knowledge.
6. Any investigation you conducted or directed into the Allegations² against Dr. Coomer prior to your broadcast, publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems, including contacting Dr. Coomer or Dominion Voting Systems regarding the Allegations.
7. Any knowledge of evidence supporting the Allegations against Dr. Coomer held prior to your broadcast, publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.
8. Any knowledge of evidence refuting the Allegations against Dr. Coomer held prior to your broadcast, publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.
9. Any knowledge of evidence you claim supports your statements about Dr. Coomer as it relates to his alleged role in rigging the 2020 Presidential election.
10. Any knowledge of or connection with Joseph Oltmann held prior to your publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.
11. Any knowledge of or connection with any other Defendant held prior to your publication, authorization, or ratification of statements regarding Dr. Coomer or Dominion Voting Systems.
12. Any agreement between you and any other Defendant regarding the publication of statements regarding Dr. Coomer or Dominion Voting Systems.
13. Any other broadcasts or publications of Allegations of election fraud relating to the 2020 Presidential election that you made, authorized, or ratified prior to the broadcasts and publications you made, authorized, or ratified regarding Dr. Coomer or Dominion Voting Systems.
14. Any financial benefit you derived from the broadcasts and publications you made, authorized, or ratified regarding Dr. Coomer or Dominion Voting Systems,

² Allegations refer to the claims made the basis of this suit in Plaintiff's First Amended Complaint.

including solicitations for donations in support of legal challenges to the 2020 Presidential election results.

15. All communications (including email and text messages) about Dr. Coomer or Dominion Voting Systems between you and:
 - a. Any other Defendant
 - b. Ron Watkins (including any aliases)
 - c. Matthew DePerno
 - d. Patrick Byrne
 - e. Russell Ramsland
 - f. Garrett Ziegler
 - g. The person that assisted you in gaining access to the “Antifa call” as described by you on the David K. Clements “The Professor’s Record” podcast dated April 20, 2021³
16. Any retractions you have made with respect to statements regarding Dr. Coomer.
17. Your standards for journalistic practices, if any, that applied to your broadcasts or publications on the 2020 Presidential election and whether you claim to be a journalist in the first instance (and any facts supporting that contention).
18. Internal communications between your staff members about election fraud coverage and coverage of the January 6, 2020 insurrection.
19. Your participation, if any, the January 6, 2020 insurrection, or media coverage thereof.
20. Any information regarding your efforts to identify, investigate, or expose members of “Antifa.”
21. Any statements you made regarding Dr. Coomer or the Allegations against Dr. Coomer in connection with efforts to establish new chapters of FEC United, expand FEC United’s presence in other states, or promote FEC United’s efforts.

³ <https://rumble.com/vfudkf-joe-oltmann-exposes-dominion-votings-eric-coomer-ties-to-antifa-skinheads-a.html>

State Of Delaware

Entity Details

9/5/2021 5:05:53PM

File Number: 2204337

Incorporation Date / Formation Date: 8/8/1989

Entity Name: FEC UNITED, INC.

Entity Kind: Corporation

Entity Type: General

Residency: Domestic

State: DELAWARE

Status: Surrendered

Status Date: 12/14/1989

Registered Agent Information

Name: THE CORPORATION TRUST COMPANY

Address: CORPORATION TRUST CENTER 1209 ORANGE ST

City: WILMINGTON

Country:

State: DE

Postal Code: 19801

Phone: 302-658-7581

Tax Information

Last Annual Report Filed: 0

Tax Due: \$ 0

Annual Tax Assessment: \$0

Total Authorized Shares: 5000

Filing History (Last 5 Filings)

Seq	Description	No of Pages	Filing Date mm/dd/yyyy	Filing Time	Effective Date mm/dd/yyyy
1	Before Issuance of Shares	1	12/14/1989	10:00 AM	12/14/1989
2	Stock Corporation	3	8/8/1989	10:15 AM	8/8/1989

mail.google.com

Gmail

Search: "Donald J Trump for President Inc"

Active

Mail Chat & Rooms

From Any time Has attachment To Is unread Advanced search

1-16 of 16

<input type="checkbox"/>	<input type="checkbox"/>	John S Baker	Inbox	Emailed last night. Below is the final version, with your name correctly spelled.	Aug 18
<input type="checkbox"/>	<input type="checkbox"/>	me, John 2	Inbox	Complaint-20201222-Eric-Coomer-Suit.pdf	Aug 17
<input type="checkbox"/>	<input type="checkbox"/>	Andrea Hall	Inbox	Sidney filed a motion to dismiss	Feb 16
<input type="checkbox"/>	<input type="checkbox"/>	Ingrid DeFranco	Court Filings	Fox's Motion to Dismiss (Paul Clement)	Feb 9
<input type="checkbox"/>	<input type="checkbox"/>	Andrea Hall	Inbox	new docs	Feb 4
<input type="checkbox"/>	<input type="checkbox"/>	Andrea Hall	Inbox	latest filings	Feb 4
<input type="checkbox"/>	<input type="checkbox"/>	Andrea Hall	Inbox	new filing	Feb 2
<input type="checkbox"/>	<input type="checkbox"/>	Andrea, me 3	Inbox	amended entry Gateway	Jan 31
<input type="checkbox"/>	<input type="checkbox"/>	Andrea Hall	Inbox	Coomer	Jan 29
<input type="checkbox"/>	<input type="checkbox"/>	Andrea, Joe 2	Inbox	Court Filings: entry for Gateway	Jan 27
<input type="checkbox"/>	<input type="checkbox"/>	Andrea Hall	Inbox	service of the parties	Jan 22
<input type="checkbox"/>	<input type="checkbox"/>	Chanel .. Andrea 21	Inbox	Coomer Suit	Jan 22
<input type="checkbox"/>	<input type="checkbox"/>	me		coomer complaint	12/23/20
<input type="checkbox"/>	<input type="checkbox"/>	100th Monkey Jedi	Inbox	Class Action Dominion/Facebook.pdf	12/22/20
<input type="checkbox"/>	<input type="checkbox"/>	Stephanie, Kristi 3	Inbox	Re: Legal Copy on FEC United Fundraising Page	11/21/20
<input type="checkbox"/>	<input type="checkbox"/>	Jake Freijo	Inbox	FEC Records	11/15/20

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**Exhibit
PX 0114
FEC United**

**Exhibit
PX 0115**
FEC United

